

**North****Yorkshire County Council****Business and Environmental Services****Our ref:**

Tel: 01609 532523

Contact: Carl BunnageEmail: carl.bunnage@northyorks.gov.ukWeb: www.northyorks.gov.uk

15 January 2015

Dear Sir /Madam,

PLAN Selby – The Sites and Policies Local Plan Initial Consultation : Response of North Yorkshire County Council.

Thank you for consulting North Yorkshire County Council (NYCC) at this initial stage in relation to PLAN Selby, the Sites and Policies Local Plan. The County Council has welcomed the discussions and joint working that have taken place (including within the context of the Duty to Cooperate in plan-making) in relation to the emerging Selby Local Plan to date. We note that this consultation is at an initial stage. As such our comments are mainly high level at this stage, and we would anticipate commenting in more detail as policies and proposed allocations within the draft plan are further developed.

Our initial comments are set-out below within this corporate response of the County Council, firstly from a strategic policy perspective with comments from specific service areas to follow.

1. Strategic Policy and General Comments

This consultation on PLAN Selby is at a very early stage of its preparation. The County Council will wish to comment in detail as policies and proposals develop, however at this stage we would offer the following officer observations in relation to specific questions and issues raised within the consultation:

.... continued

Policy and Strategy Team
Selby District Council
Doncaster Road
Selby
North Yorkshire
YO8 9FT



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Question 8 (p.22): Over-allocation of development.

Whilst the logic behind the idea of over-allocating to account for an element of non-delivery is understood, it is important that a balanced and proportionate approach is taken. Excessive over-allocation would run the risk of amplifying the infrastructure requirements and burdens in relation to, amongst other things, highways and educational matters. The County Council would encourage a continued plan, monitor and manage approach in relation to any policy facilitating over-allocation.

Question 9 (p.26): Distribution across Designated Service Villages (DSV)

It is suggested that any starting-point for distributing growth across DSVs should be evidence based, and as part of this should have regard to the need to minimise the need for additional infrastructure (through individual or cumulative allocations) and commuting; whilst also taking advantage of opportunities to enhance and secure the vitality and viability of rural settlements and services.

An evidence-based approach, with the identification of appropriate criteria to drive it, would be particularly important should the District Council be considering over-allocating development as raised at Question 8 above.

Question 16 (p.40): Employment Allocations

Whilst there may be a case for having policies that are specific about types of uses on particular sites, the development of such policies should be informed by the findings of the Employment Land Review (ELR) which is currently being updated and the Retail, Commercial and Leisure Study (RCLS). The County Council may wish to comment in more detail on such policies as they develop in due course.

Question 19 (p.42): Rural Economic Growth Sites

We note that the consultation seeks feedback as to whether there is a need for any special policies for particular rural sites to support the rural economy (with the examples being given of Drax and Eggborough power stations, the former mine sites, and former airfields). It is important that there is clarity in relation to the policy status of such sites and that appropriate policy support for the rural economy is provided within PLAN Selby. The County Council would wish to work closely with the District Council in the development of any policies relating to specific sites, particularly where there may be implications for matters such as the highways network, and minerals and waste policy and consents.

Question 20 (p45): Retail Policy

The District Council may wish to consider a masterplanning approach to shaping how each of the three town centres (Selby, Tadcaster and Sherburn) should be developed. This would provide advantages through enabling a coordinated framework through which to consider whether any further investments in infrastructure are required and how these might be delivered.



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Question 25 (p.55): Infrastructure Requirements

The County Council has already supported and contributed towards the work to prepare the Selby Local Plan Infrastructure Delivery Plan (IDP). We remain committed to providing any further advice, assistance and updates in relation to infrastructure needs as work on PLAN Selby develops, including through the Infrastructure Delivery Statement approach that we have already initiated together.

Question 26e (p.26): Renewable and Low Carbon Energy

We note the question as to whether a policy around separation thresholds should be established in relation to renewable and low carbon energy generation. There is currently no basis in national planning policy to support the establishment of such thresholds, however it is suggested that PLAN Selby could helpfully have regard, and refer to, the North Yorkshire and York Landscape Sensitivity Framework for Renewable Energy (Aecom, 2012) technical toolkit in relation to both the development of policy and development management procedures.

2. Minerals and Waste Planning Policy Comments

Within Para 3.76 there is a minor factual point – the Southmoor EfW application is now expected to be re-determined during February 2015.

Question 16 (p.40): Employment Allocations

There is a need to ensure some industrial estate/employment locations are identified as being suitable for uses such as waste management which are not necessarily perceived as being good neighbours – ie a broad portfolio of site types/characters may be helpful in order to facilitate provision of opportunities for waste management infrastructure.

Green Belt Policy

Consideration should be given to excluding certain waste management sites from the Green Belt in order to facilitate future development at them in the light of latest (and more restrictive) national policy in waste development in the Green Belt.

3. Local Highways Authority Comments

North Yorkshire County Council as the Local Highway Authority (LHA) acknowledges that the Selby District Council's Sites and Policies Local Plan- 'PLAN' Selby recognises infrastructure needs as a key issue when identifying feasible growth areas.



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Selby District Council have commissioned consultants to carry out Highways Assessments which will be used to inform the choice of potential growth areas. The LHA are key consultees in this piece of work and will provide appropriate support to ensure the evidence provided is robust.

Selby have also identified the need to identify the impact of the site specific allocations at a later stage of the 'PLAN' Selby process.

It should be noted that following the Highway assessment work it is likely that the Infrastructure Development Plan will need to be updated to reflect all necessary mitigation measures that require implementation before the end of the Plan year.

Thank you again for consulting the County Council on this matter. If you would find any further clarification helpful then please do not hesitate to contact me. Meanwhile we very much hope for, and look forward to, further joint working on the matters highlighted within this response as well as further consultation as the Draft Plan develops.

Yours faithfully,

Carl Bunnage

Head of Strategic Policy and Economic Growth