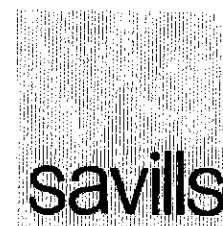


19 July 2012



**For the attention of Mr A McMillan**

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**By email and post**

Dear Sir

**Submission Draft Core Strategy  
Mr M Pearson  
Land at Drax Road, Camblesforth**

We wish to submit representations on behalf of our client, Mr M Pearson, on the Sixth Set of Proposed Changes (Main Modifications and Additional Modifications) to the Submission Draft Core Strategy (SDCS).

We understand that the principal purpose of this consultation exercise is to take account of the introduction of the National Planning Policy Framework (NPPF) on 27 March this year. These representations are therefore confined to the implications of the NPPF on the emerging Core Strategy insofar as it affects the village of Camblesforth and our client's site in particular.

Our client owns the Phase 2 site identified in the adopted Local Plan as CAM/1. Our previous comments on the Site Allocations DPD focussed on the continued ability of the site to deliver much needed future growth and regeneration for Camblesforth and the surrounding area. This letter should also therefore be read in conjunction with those representations dated 2 December 2011.

**Background**

The NPPF represents a fundamental shift in the approach Local Planning Authorities must adopt to plan-making; replacing previous guidance in Planning Policy Statement 12 (Local Spatial Planning). The overarching theme of the NPPF is a "presumption in favour of sustainable development". The three central requirements of sustainable development are:

- **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- **a social role** – supporting strong, vibrant and healthy communities; by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.



The overwhelming emphasis however is on growth and in terms of planning for future housing, to ensure that there is not only enough development to meet the needs of the population, but to also allow a degree of flexibility, choice and competition (Paragraph 47). There is also a clear emphasis on utilising residential development to help aid economic growth and regeneration (Paragraph 17).

It is with this in mind that we provide comments on the latest draft of the SDCS below.

### Comments

We note that in accordance with the Core Strategy as currently drafted, limited development is proposed across a number of 'Designated Service Villages' (DSVs), but that Camblesforth has not been identified as one of them. Previous drafts of both the Core Strategy and Site Allocations Development Plan Document suggest the reason for this is that the village is constrained by flood risk in that there are no developable sites outside of Flood Zone 3.

The NPPF's advice concerning flood risk is set out in Paragraphs 100-104 and in a separate Technical Guidance Note. Both documents ostensibly carry over advice outlined in Planning Policy Statement 25 (Development and Flood Risk) that housing development can be undertaken in Flood Zone 3 provided that an Exception Test can be passed. We contend that in the circumstances, there is sufficient confidence that an Exception Test could be passed to allow the principle of development in Camblesforth to be established in the Core Strategy and to establish the settlement as a DSV. The Exception Test includes matters such as wider benefits; the reasonable availability of alternative previously-developed sites; and confidence that development can be undertaken safely.

The wider benefits are considered to be the role that Camblesforth can play in satisfying both District-wide and local housing need. We note that in April the Council instructed Arup to re-examine population projections for the district to ensure that the correct amount of housing is being planned for in the emerging Core Strategy. The work reiterated that the basis for housing growth projections should continue to be based on 2004 household projections. This yields a net requirement of 450 dwellings per annum. Our client has significant misgivings regarding this for the following reasons:

- The 2004 based population projections represent a significantly out-of-date model on which to base housing requirements up to 2027. The justification Arup use for these figures is at best tenuous and given that more recent projections are available (2010 projections and a new baseline in the form of the 2011 census data), we firmly believe these more up-to-date figures should be utilised in order to provide a sound basis for growth.
- The projections also seem to approach housing growth in trying to provide figures to cover need within the plan period only. This is inconsistent with thrust of the NPPF, which is to plan *positively* for growth and to allow a degree of flexibility, choice and competition in housing sites. This choice, flexibility and competition can readily be accommodated in villages and centres such as Camblesforth to foster this growth and to ensure these communities remain viable and sustainable.

Whilst we acknowledge that some of the amendments proposed in the latest draft of the SDCS make reference to this requirement to provide some flexibility in supporting housing growth in the District (Paragraph 4.39) this clearly does not go far enough in producing a positive strategy for growth.

With this in mind the Council ought to be examining which sites are capable of accommodating growth and in line with the NPPF, ensure that such sites can support sustainable development. Given the sustainability credentials of Camblesforth relative to the identified DSVs, we considered it at least an equally appropriate location to accommodate the District's future housing growth. We note that in the scoring assessment carried out within the *Assessing the Relative Sustainability of Rural Settlements (Updated February 2010)* document, the Council ranked Camblesforth equally with the following DSVs: Carlton, Cawood, Monk Fryston, Eggborough, Kellington, Ulleskeif, Church Fenton and Fairburn. It also ranked better than Appleton Roebuck.

In relation to the other elements of the Exception Test, the Selby SHLAA confirms that housing need in both Camblesforth and the wider South East HMA cannot be accommodated on previously-developed sites and preliminary work undertaken on behalf of our client by hydrologists indicates that development could be accommodated safely.

This information would demonstrate that in relation to the Exceptions Test our client's site is capable of emerging as a deliverable development site and Camblesforth should be designated as a DSV given that it would promote growth and sustainable development consistent with the NPPF and address a housing need that is currently underestimated in the draft of the Core Strategy.

### **Conclusions**

From our analysis of the NPPF and the current draft of the Core Strategy we conclude that whilst Camblesforth is not currently identified as a DSV on the grounds that its developable sites lie within Flood Zone 3, the NPPF and its supporting Technical Guidance state that if an Exceptions Test is fulfilled then housing can be accommodated on such sites.

The site principally fulfils the Exceptions Test by providing wider benefits to the area by addressing housing need, which is currently underestimated in the emerging Core Strategy, as well as providing positive growth and an opportunity for additional flexibility, choice and competition in the local housing market (required through the NPPF). The potential of the site to accommodate sustainable development is clear and the Council's own evidence base points to the settlement being as sustainable as a number of other designated DSVs. The opportunity to unlock development and regenerate the Camblesforth area to promote sustainable development is therefore clear.

The Council's own evidence also points to the fact that within Camblesforth there are no previously developed sites that could fulfil this role and there is also no evidence to suggest housing in the settlement could not be accommodated safely.

In light of the overwhelming emphasis on promoting growth and housing choice in the NPPF and the need for the Council to provide housing in line with more realistic population projections we believe our clients site can offer an opportunity for sustainable growth and therefore request that Camblesforth is re-evaluated as a DSV.

We trust that this information will be taken into account once the Core Strategy examination is re-opened. Should you have any queries please do not hesitate to contact me.

Yours faithfully



**Richard Serra MRICS MRTPI**  
Director