

Policy Team
Selby District Council
Civic Centre
Doncaster Road
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18638/A3/SN/ds

13th April 2012

Dear Sirs

FURTHER CONSULTATION ON THE IMPLICATIONS OF THE NPPF ON THE SELBY CORE STRATEGY

Following the Selby Core Strategy Examination in Public (EiP) a request was made to the Inspector to adjourn the Examination for six months to enable further evidence to be provided and amendments made to the Core Strategy. The Council provided further information in relation to the proposed level of housing required in the district over the plan period, the distribution of housing across the district and made amendments to the Green Belt policy contained within the Core Strategy.

Representations have been made on these changes previously on behalf of Barratt and David Wilson Homes with specific regard to the level of housing being proposed by the Council and the findings of the Arup report titled 'The Scale of Future Housing Growth in Selby'.

The comments made regarding the ARUP report in previous representations raised concerns over the use of 2004 household projections rather than the most up-to-date figures, the disregard to cross-boundary issues and the proposals to reduce the level of delivery in the first five years of the plan period.

Following the Council's revisions to the Core Strategy and subsequent representations made on behalf of Barratt and David Wilson homes, the National Planning Policy Framework (NPPF) was published by the Government on 27th March. The NPPF is a key part of the Government's reforms to the planning system in England providing a single policy framework, replacing almost all the PPGs, PPSs and related circulars and letters, which are immediately superseded.

Paragraph 14 confirms that **'At the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking'** Furthermore it confirms that for plan-making this means:

- Local Planning Authorities should positively seek opportunities to meet the development needs of their area; and
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework [the NPPF] taken as a whole; or
 - specific policies in this Framework [the NPPF] indicate development should be restricted.

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Further guidance on plan-making can be found in paragraphs 150-185 of the NPPF. Of most relevance to the previous representations made by Barratt and David Wilson Homes are paragraphs 158 and 159, which highlight the importance of utilising a proportionate evidence base.

Paragraph 158 confirms that **'Each local planning authority should ensure that the local plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.'**

The Council's approach proposes to disregard the most up-to-date evidence (2008 household projections), and rather it utilises an out-of-date evidence base in the form of the 2004 CLG projections. In order to support this approach the Council commissioned a report by ARUP to assess a variety of scenarios for delivering different levels of housing, which ultimately concluded that the figure of 450 was the most appropriate. It is considered that this report does not provide 'evidence' for the figure of 450 dwellings per annum as required by the NPPF, rather it provides 'justification' for utilising an out-of-date evidence base. In this respect it is not considered that the revised housing figure, and in turn the Core Strategy, comply with paragraph 158 of the NPPF.

Paragraph 159 requires that Local Planning Authorities should have a clear understanding of housing needs in their area and requires that they:

'prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- **meets household and population projections, taking account of migration and demographic change;**
- **addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and**
- **caters for housing demand and the scale of housing supply necessary to meet this demand.'**

This policy requires all three tests to be met in order to identify the level of housing required by a district and ultimately provided through the Core Strategy. The policy requires all three elements to be adhered to rather than a selective policy that only requires compliance with one of the three tests. Consequently the third criteria cannot reduce the household population projections should a low demand be identified by the Council, however, in the event of a higher demand than the household population projections, it would be necessary to provide a higher level of housing than that shown on the projections.

In respect of the Council's current approach it is not considered that the reliance on the 2004 household projections meets the first criteria. Furthermore the ARUP report which dismisses cross-boundary issues clearly does not take account of migration and demographic change. The Selby 2009 SHMA highlights the levels of in-migration, therefore, in accordance with the NPPF, this should be included rather than dismissed as per the ARUP report.

In order to comply with the NPPF, and in particular paragraph 159, the Council must demonstrate that the level of demand has been identified and planned for, which, if applicable, will provide for more housing than that shown in the household projections.

At the time of writing the Council's response to the NPPF and the tests contained therein is not known, therefore Barratt and David Wilson Homes reserve the right to comment further as appropriate at the reconvened Examination.

Yours faithfully



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Associate

Cc. Paul Butler Barratt & David Wilson Homes

