

Selby District Council

Duty to Cooperate Compliance Statement

13 April 2012



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Introduction and Purpose of the Paper

1. At the EIP adjournment in September 2011, in agreement with the Inspector, the Council proposed an ambitious 6 month work programme to work on the Council's housing target, Green Belt policy, and the role of Tadcaster.
2. Further consultation has taken place on the Proposed Changes to the Core Strategy. Almost the whole of the submitted Core Strategy policy framework remains unchanged. Only 'the 3 topics' and Proposed Changes have been revised and undergone further public consultation.
3. Section 110 of the Localism Act 2011 introduces a new Section 33A to the Planning and Compulsory Purchase Act 2004 –a 'duty to cooperate' between adjoining local authorities and other public bodies.
4. The Department of Communities and Local Government and the Submission Draft Core Strategy (SDCS) Inspector had confirmed that, because the Selby Core Strategy, had already been submitted prior to s110 being enacted (15 November 2011), the Council does not have to comply with the requirement because it does not apply retrospectively.
5. A number of representations submitted in response to the consultation on the Council's Proposed Changes to the SDCS have suggested that the provision does apply because the Proposed Changes consultation is part of the plan preparation process and took place after the 15 November 2011.
6. The Council does not accept that the DTC applies to the Proposed Changes. The independent assessment of a plan by an inspector is for its policies to be tested and challenged and possibly modified through the process. The reconvening of the EiP in this case is part of this testing and modifying process and not plan preparation. This is supported by the wording within the 2004 Act – s.19 being concerned with plan preparation and s.20 with submission and examination. All matters on the agenda have arisen through the testing and challenging of the submitted SDCS not through any formal plan preparation process, which ceased when the CS was submitted. The DTC does not apply retrospectively.
7. However, if the Inspector determines that there has been plan preparation and, therefore, the DTC arises in principle, this Statement aims to address in more detail the Proposed Changes to the Core Strategy in relation to the DTC by (a) assessing whether they are strategic matters having a significant impact on at least 2 planning areas and (b) assessing whether the DTC has in any event been met.
8. This paper therefore addresses the following issues by section;
 1. **Cooperation in the wider Selby Core Strategy process**
 2. **The Duty to Cooperate requirements**
 3. **The Duty to Cooperate and Proposed Changes January 2012**
 4. **Evidence**
 5. **Conclusions**

1. Cooperation in the wider Selby Core Strategy process.

- 1.1 Selby District Council has been working on the Core Strategy document since 2005, within the regional model and Regional Spatial Strategy context. Appendix 1 provides a summary of the key stages of Core Strategy preparation in relation to the regional, strategic context.
- 1.2 Prior to the new Duty to Cooperate, the regional planning system provided the mechanism for ensuring cross-boundary working. Cooperation on strategic issues was undertaken through and properly dealt with by the strategic planning framework of the Regional Spatial Strategy (RSS). RSS for Selby District is the Yorkshire and Humber Plan, adopted 2005. Sections 1, 2 and 3 of the Planning and Compulsory Purchase Act 2004 (PCPA) set out the role of regional planning.
- 1.3 The minimum requirements for consultation were defined in the Town and Country Planning (Local Development) (England) Regulations 2004, which include those bodies who must be consulted, and those that should be considered for consultation, should the Council decide that they will be affected. These bodies are defined in Appendix 2 of the Council's adopted Statement of Community Involvement (SCI) (CD13) as either specific consultation bodies, or as specific types of other bodies. The SCI sets out the methods of consultation and provides a list of those bodies which are consulted on DPDs.
- 1.4 The SDCS Regulation 30 Statement (CD10) submitted for Examination to the Secretary of State, sets out how SDC has continually consulted on the Core Strategy, with whom and provides a copy of all responses. At each stage of the Core Strategy preparation process, SDC consulted all our neighbouring LPAs (and public bodies). No objections were received from any neighbouring LPAs. Comments were received from the strategic authorities of Yorkshire and Humber Assembly, Yorkshire Forward, and Government Office for Yorkshire and the Humber at Issues and Options stage, Further Options stage and Draft Core Strategy stage.

Cooperation through RSS

- 1.5 On submission of the Core Strategy to the Secretary of State through the Planning Inspectorate (PINS) in May 2011, the Council had prepared the Core Strategy in line with the Regional Spatial Strategy.
- 1.6 The Council's Written Statement Number 1 (document reference number 'SDC/Matters 1.1 – 1.6') submitted to the EIP in response to the Inspector's Matters and Issues, deals with general conformity issues and states at paragraph 1.6.2 that "*The status of RSS and the Councils' position are explained in an explanatory note at the beginning of the Core Strategy. The Core Strategy generally conforms with RSS (see letter from Local Government and Yorkshire in Appendix 1 and the Council's response to*

- Question 2.1 in a separate paper)*".¹
- 1.7 The Council's Written Statement Number 2 (document reference number 'SDC/Overall Strategy/Key Diagram/Matters 2.1 – 2.5, 2.7') submitted to the EIP in response to the Inspector's Matters and Issues, Question 2.1, also deals with general conformity issues and states at paragraph 2.1.1 that "*Full account has been taken of current national planning guidance in the preparation of the Core Strategy and the Council is satisfied that the Core Strategy broadly conforms with the RSS.*"
- 1.8 It goes on to say in paragraph 2.1.6 that "*While there is no longer a requirement to obtain a 'letter of general conformity with RSS from an appropriate Regional Body, the organisation formerly responsible for RSS (Local Government for Yorkshire and the Humber) confirmed in a letter dated May 2010 (see Appendix 1) that there were no significant discrepancies between the Consultation Draft Core Strategy (preferred options stage) and the outcomes for Selby District being sought in the RSS. (as referred to in Para 4.3 of the Core Strategy).*"
- 1.9 The SDCS was prepared in conformity with the RSS and until revoked² the RSS remains in place.
- 1.10 Strategic co-ordination on cross boundary planning issues was thus achieved by preparation of the SDCS in the regional planning context. In addition to this the SDCS was subject to the Sustainability Appraisal process as an integral part of the plan preparation process which considered strategic issues. In addition, the development of the Infrastructure Delivery Plan, alongside the SDCS took account of cross-boundary impacts through involving cooperation with public bodies who have a wider than District role.

Appropriate Assessment of the Submission Draft Core Strategy

- 1.11 Strategic Environmental Assessment/Sustainability Appraisal (SEA/SA) and the Habitats Regulation Assessment (HRA) consider cross boundary issues such as water resources, wildlife patterns, and transport. Such issues do not confine themselves to administrative boundaries and therefore the SA/SEA/HRA processes consider the wider impacts of development. SEA/SA/HRA are developed alongside several statutory bodies such as English Heritage, Environment Agency and Natural England and thus a high level cooperation across the District's boundaries is achieved.
- 1.12 Scoping of the SA/SEA/HRA took place at the beginning of the Core Strategy work in 2005 which identified the strategic matters and cross boundary issues. Consideration of the wider sustainability impacts of Core Strategy policy have consistently been evaluated at every stage of plan development. See Core Documents CD17 – h.

¹ See Core Strategy EIP web page for full copy

² Section 109 Localism Act gives Government the powers to revoke the eight Regional Strategies outside London following completion of an 'environmental assessment' for each – this is yet to happen.

Infrastructure Delivery Plan

- 1.13 Infrastructure such as roads, water supply, water treatment and energy supply are inevitably cross-boundary issues and therefore the supporting Infrastructure Delivery Plan (CD19) submitted as part of the Core Strategy in May 2011 has been developed in partnership with the relevant public bodies to determine capacity issues and if any infrastructure improvements are required. Those bodies include the Environment Agency, Highways Agency, North Yorkshire County Highways Authority, the Primary Care Trust, National Grid, Yorkshire Water, Network Rail, North Yorkshire Education Authority, Arriva, Northern Gas and Natural England. All such agencies have considered cross boundary issues in their assessments of the strategic impact of growth originating in Selby in cumulative terms with other LPAs growth, thus ensuring the vital cooperation is undertaken.

2. The Duty to Cooperate Requirements

Localism Act 2011

- 2.1 The Duty to Cooperate (DTC) aims to be the main mechanism for joint working over administrative boundaries. The Localism Act (Section 110 and Section 33A of the Planning and Compulsory Purchase Act) require that local authorities co-operate with others in the terms set out below.
- 2.2 Subsection (1) of Section 33A requires the local planning authority, to co-operate with the county council and prescribed bodies³ in maximising the effectiveness with which activities within subsection (3) are undertaken.
- 2.3 Subsection (2) sets out that the duty imposed on the LPA requires it:
- (a) to engage constructively, actively and on an on-going basis in any process by means of which activities within subsection (3) are undertaken, and
 - (b) to have regard to activities of a person within subsection (9) so far as they are relevant to activities within subsection (3).
- 2.4 Subsection (3) sets out that the activities referred to are:
- (a) the preparation of development plan documents,
 - (b) the preparation of other local development documents,
 - (c) the preparation of marine plans under the Marine and Coastal Access Act 2009 for the English inshore region, the English offshore region or any part of either of those regions,
 - (d) activities that can reasonably be considered to prepare the way for activities within any of paragraphs (a) to (c) that are, or could be, contemplated, and
 - (e) activities that support activities within any of paragraphs (a) to (c), so far as relating to a strategic matter.

³ Prescribed bodies are defined in The Town and Country Planning (Local Planning) (England) Regulations 2012.

- 2.5 For the purposes of subsection (3), each of the following is, by subsection (4), a “strategic matter”:
- (a) sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and
 - (b) sustainable development or use of land in a two-tier area if the development or use -
 - (i) is a county matter, or
 - (ii) has or would have a significant impact on a county matter.
- 2.6 Subsection (6) states that the engagement required of a person by subsection (2)(a) includes, in particular:
- (a) considering whether to consult on and prepare, and enter into and publish, agreements on joint approaches to the undertaking of activities within subsection (3), and
 - (b) if the person is a local planning authority, considering whether to agree under section 28 to prepare joint local development documents.
- 2.7 Subsection (7) sets out that a person subject to the duty under subsection (1) must have regard to any guidance given by the Secretary of State about how the duty is to be complied with. However, as of April 2012, no guidance has been made available. CLG has taken a step back and is not planning to publish guidance.

Guidance on how to comply with the Duty

- 2.8 In the absence of specific government guidance, the Council has sought to frame this Statement in the light of the National Planning Policy Framework (NPPF, published March 2012) and have regard to Planning Advisory Service (PAS) advice.
- 2.9 It is understood that PAS intend to publish advice on how to comply with the DTC, but this is not yet forthcoming. Regard has therefore been given to oral advice given at an event on the DTC in Leeds on the 16 February 2012. A range of speakers from Department of Communities and Local Government, the Planning Inspectorate, the Environment Agency and PAS provided the context in delivering this new approach to strategic planning. Some general advice is published on their website (www.pas.gov.uk). This includes a practice guide Strategic Planning and Investment Working for sustainable growth and A Simple Guide to Strategic Planning and the ‘Duty to Cooperate’.

The National Planning Policy Framework

- 2.10 The recent NPPF sets out how LPAs should undertake planning strategically across local boundaries.
- 2.11 NPPF paragraph 178. - Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.
- 2.12 NPPF paragraph 179. - Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.
- 2.13 NPPF paragraph 180. - Local planning authorities should take account of different geographic areas, including travel-to-work areas. In two tier areas, county and district authorities should cooperate with each other on relevant issues. Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships. Local planning authorities should also work collaboratively with private sector bodies, utility and infrastructure providers (*see section 4 below*).
- 2.14 NPPF paragraph 181. - Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.
- 2.15 NPPF paragraph 182. - The Local Plan will be examined by an independent inspector whose 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. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:
- **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.

- 2.16 Section 3 below sets out how the Council has met these NPPF requirements in relation to the Proposed Changes.
- 2.17 Section 4 outlines the cooperative approach to capacity and infrastructure requirements which has been followed by the Council.

3.0 The Duty to Cooperate (DTC) and Proposed Changes January 2012

- 3.1 The Proposed Changes January 2012 relate to 3 topics. These are the strategic approach to green belt releases, the scale of housing and employment development proposed for Tadcaster and the implications for the Green Belt and the overall scale of housing development over the plan period.
- 3.2 The process involved in, and associated with, proposing these changes will only engage the DTC if it falls within the meaning of “the preparation of development plan documents” in section 33A(3). The Council does not accept that this is the case for the reasons already set out in the introduction to this paper. If that is wrong, the DTC will nevertheless only come into play in respect of the 3 topics which form the subject of the Proposed Changes January 2012 because it is only these topics which have been subject to any further process after 15th November 2011. Moreover, the DTC would only then arise if the 3 topics relate to “strategic matters”. The Council does not consider this to be the case for reasons which are set out below. However, even if this is wrong and the DTC were to apply, the Council nevertheless considers that it has done sufficient in the circumstances to comply with the duty.
- 3.3 This section considers each of the 3 topics in turn and for each assesses whether any elements of the 3 topics are ‘strategic matters’ as defined by the Localism Act, that is:
- “sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas”*
- 3.4 As part of this assessment it considers, how the Council has assessed the Proposed Changes for their cross boundary impacts through liaison and

- cooperation with other public bodies on capacity and infrastructure planning as well as adjoining LPAs on commonality of approach to assessing housing requirements and impacts of Core Strategy policies.
- 3.5 The Council shows that, as the SDCS conforms to the extant RSS, the Proposed Changes in general conform to the Interim Spatial Strategy which has been agreed in the Leeds City Region.
- 3.6 This section also deals with the positive cooperation between adjoining LPAs in the region and also the limitations which attach to co-operation at present in the light of no regulations, no detailed CLG guidance (and only broad brush words in NPPF) and developing regional mechanisms.
- 3.7 In addition, Section 4 illustrates how the evidence base which has underpinned decisions relating to the Proposed Changes is based on a common approach in the sub-region.

a) Housing Scale and Distribution

- 3.8 Clearly housing scale and distribution are strategic matters in the general planning policy sense and go beyond administrative boundaries. However only those strategic matters as defined by the LA11 are subject to DTC. Therefore this section considers whether the Proposed Changes in relation to housing scale and distribution “would have a significant impact on at least two planning areas”.
- 3.9 The Proposed Changes do not alter the overall strategy. The Core Strategy is in conformity with RSS which was the mechanism for interpreting strategic planning issues across local authority boundaries.
- 3.10 The Submission Draft Core Strategy (SDCS) included a housing target of 440 dwellings per annum (dpa) in line with the RSS. The Proposed Change from 440 dpa to 450 dpa is derived from reviewing the housing needs of the District in the light of up-to-date evidence and in anticipation of the revocation of RSS.
- 3.11 It is recognised that the consideration of reviewing housing scale and distribution has the potential for having a significant impact. However because the Proposed Change is in excess of the RSS requirement (i.e. does not represent a potential shortfall against regionally agreed District allocations) and is only a small increase (based on robust local evidence), the Council considers that it is not a change which would have a significant impact in the regional context (see box below) and therefore does not fall within the DTC.

How Selby District's annual requirement of 450 dpa compares to our neighbours (*dwellings per year*):

Leeds (Publication Draft CS)	3660	then	4700
ERYC (Consultation Draft CS)	1500		
York (Submission Draft CS)	635	then	855
Wakefield (Adopted CS 2009)	1170	then	1600
Doncaster ('sound' Core Strategy) ⁴	1230		
Harrogate (adopted CS 2009)	390		

- 3.12 The Council does however recognise that the approach to objectively assessing housing figures should be coordinated with other LPAs approaches for reasonable consistency and has set out below:
- how the scale of housing requirement and retention of the overall strategy remains within the strategic priorities of the region as set out in the jointly prepared Interim Spatial Strategy
 - how cooperation with public bodies through the infrastructure delivery plan and consultation takes on board cross-boundary impacts and other common approaches to evidence base
 - How specific views from adjoining LPAs inform the position.
- 3.13 It has been shown that the SDCS has been developed within the regional mechanism for coordination of strategic planning issues through the RSS. Since the government's announcement of the intended revocation of RSS, there have been wider national and regional changes outside the control of the Council. LPAs in the region have sought to establish both informal and formal working relationships in order to tackle cross-boundary issues through regional spatial planning.
- 3.14 There are changing and ongoing methods of cooperation that the Council has engaged with whilst considering the Proposed Changes and Appendix 2 provides a summary table of the key milestones achieved in the sub regions of Leeds City Region (LCR) and North Yorkshire and York (NY&Y) (Selby District falls within both sub regions) to demonstrate that the SDCS and Proposed Changes are compliant with the strategic priorities agreed with neighbours.
- 3.15 The LCR Interim Spatial Strategy (ISS) takes forward the key strategic policies from the RSS. Appendix 3 is a copy of the Interim Spatial Strategy, to which all LPAs in the LCR are signed up. It was agreed by the Leaders'

⁴ Inspector's Report March 2012, plan to adopt in the summer 2012.

- Board of the Leeds City Partnership and the Local Enterprise Partnership; which has also in principle agreed to work on future joint planning arrangements.
- 3.16 Local Government for North Yorkshire and York agreed the “NY&Y Sub Regional Strategy” in 2011 but this hasn’t been formally approved.
- 3.17 Concerning emerging methods of cooperation, the Council has been actively involved in a wide range of vehicles for cooperation including:
- LCR Leaders Board
 - LCR Local Enterprise Partnership
 - York, North Yorkshire and East Riding Local Enterprise Partnership
 - North Yorkshire Development Plans Forum
 - York Sub Area Joint Infrastructure Working Forum
 - Duty to Cooperate Working Group LCR
- 3.18 These are both informal and formal structures where cross-boundary issues are raised and approaches decided in order to ensure cooperation between the LPAs in the region, including the spatial planning aspects of the work of the LEPs. The Leeds city region partnership is also the LEP. The Proposed Changes were specifically discussed with adjoining LPAs at the DTC Working Group at the January and March meetings.

Revising the Core Strategy Housing Target and Distribution and Impacts cross boundary

- 3.19 Whilst housing numbers and strategic priorities have been agreed in the RSS and strategic priorities in the region taken forward in principle through the ISS; regional arrangements are not yet at a stage where formal joint planning is established, nor are specific housing numbers agreed across borders. One of the reasons for this is that neighbouring LPAs are at different stages in developing their Local Development Frameworks
- 3.20 It has therefore not been possible to work with and agree housing numbers with our neighbours. Instead the Council considers that cross boundary issues have been taken into account because :
- The methodology of re-assessing housing numbers in the light of ONS/CLG population and household projections is based on best practice in the light of local evidence and taking into account migration, household size and economic signals (Arup, November 2011 CD56)
 - The ONS population projection figures take into account migration across borders so already cross boundary impacts are reflected in figures
 - The Council cooperated with public bodies on infrastructure

requirements (see also section 4 below)

- The method used for re-assessment of the District housing requirement is not inconsistent with approaches of neighbours (see also Arup Housing Context Paper April 2012 CD56a)
- Neighbouring LPAs recognise that because of this further work it is apparent that SDCS and Proposed Changes are catering for Selby District's own requirements
- Neighbouring LPAs have also done similar exercises⁵ and are catering for their own needs

3.21 The Council consulted on the revised housing target as part of the Proposed Changes Consultation exercise in January 2012. Further details on this process are explained in the Consultation Statement Addendum (CD9a). CD9a provides the list of bodies that were consulted. This consultation on the Proposed Changes with public bodies elicited no objections.

3.22 Selby District Council received 3 consultation responses from adjoining LPAs to the Proposed Changes to the Core Strategy. These are summarised below:

Adjoining LPAs

City of York Council

- Committed to working with SDC on cross boundary issues. Welcome the additional work that has been undertaken to review the evidence base. Highlights some points within the evidence base but raise no concerns over the housing scale and distribution.

East Riding Council

- Welcome opportunities to work on cross boundary issues which will help to ensure the authorities prepare complementary Local Plans and fulfil the requirements of the duty to cooperate.
- Note amendments to scale of housing and note additional evidence has been prepared to inform the level of housing. This approach is considered to be broadly consistent with the ERYC emerging Core Strategy.

North Yorkshire County Council

- Objection regarding Policy CP9 (specifically as it relates to the former mine sites) but from a planning perspective the County

⁵With the exception of Wakefield who settled their housing numbers in the Core Strategy and Development Policies document adopted in 2009. This is an important point because it illustrates the difficulty of choreographing any review of scale and pattern of housing in that it shows not all authorities are at a point where figures are susceptible to change through plan preparation

Council does not wish to make any further comments in relation to the Submission Draft Core Strategy.

Other Public Bodies

7 responses were received from the following other public bodies - none of which raised any concerns:

- *The Coal Authority*
- *The Homes and Communities Agency*
- *The Theatres Trust*
- *The Highways Agency*
- *English Heritage*
- *The Environment Agency*
- *Natural England*

Further Analysis of Impacts of adjoining Core Strategies

- 3.23 The Council has considered cross boundary impacts of housing growth on and from neighbouring authorities as set out in the Arup Housing Paper (CD56) which considered the impact of both Leeds and York and East Riding and surrounding Districts.
- 3.24 Since the Proposed Changes were subject to consultation in January, a number of neighbouring LPAs have made progress on their own Core Strategies including assessments of their own housing requirements. An up-dated, further assessment has been undertaken in March/April 2012 to ensure that the further progress that adjoining LPAs have made on their LDFs has been taken into account (see Arup Report April 2012, CD56a).
- 3.25 This is in addition to the further written statements provided by the neighbouring LPAs on the cross boundary impacts. The Council specifically sought written views from neighbouring LPAs in March this year and copies of the statements from neighbouring authorities are provided at Appendix 4 of this Statement. These statements confirm the above and demonstrate that the Proposed Change is small and not a strategic matter because it would not have a significant impact on at least two planning areas.
- b) Distribution – level of employment and housing growth in Tadcaster / deliverability issues**
- 3.26 The strategy for the distribution of new employment and housing development within the District is in conformity with the RSS. Selby is the Principal Town being the focus of growth and the Local Service Centres of

Tadcaster and Sherburn in Elmet accommodating local needs (along with the most sustainable designated service villages). The principles of this distribution strategy have not been altered through the Proposed Changes.

- 3.27 Further, the method for allocating the specific amounts of housing growth to the settlements remains unchanged in principle, being based on a balanced approach of directing development to areas of need as evidenced in the 2009 Selby District Strategic Housing Market Assessment (SHMA) (see Background Paper No. 3 and its Addendum (CD22b) and Background Paper No. 14 (CD22m)). The change to the numbers results from returning to the SHMA data rather than the previous approach in the SDCS of skewing the requirement to take account of other objectives. The revised approach is considered more robust and based on precise evidence.
- 3.28 There is no change to employment figures. Policy CP9 establishes that 5-10 hectares of employment land will be allocated in each of the two Local Service Centres through the Sites Allocation Development Plan Document.
- 3.29 The Proposed Change to the level of growth in Tadcaster is a direct result of returning to the evidence base on housing need and taking into account the availability of land for new development in Tadcaster. The effect of the Proposed Change is illustrated in the table below:

	Overall Requirement SDCS %	Overall Requirement Proposed Change %	SDCS Policy CP2 New Allocations	Proposed Change CP2 New Allocations	Difference
Sherburn	9	11	498	718	+220
Tadcaster	9	7	457	364	- 93

- 3.30 The Infrastructure Delivery Plan (IDP) working group (see also section 4 below) assessed the impact on infrastructure capacity of these proposed changes prior to consultation. This exercise on understanding impacts on capacity of infrastructure raised no concerns over the changes to the housing figures (the Addendum to the IDP (CD19a) provides a summary) and informed the Proposed Changes prior to consultation. The responses to the consultation from LPAs and other public bodies are referenced in Section 3 above.
- 3.31 The Council considers the potential cross boundary policy impacts would relate to the SDCS strategic objectives to reduce out commuting and seek to increase self-containment. Would the scale of the re-distribution of housing growth impact on this objective and thus whether there is a significant impact on at least two planning areas? The Council does not consider this to be the case taking a holistic view.
- 3.32 Sherburn already has a significant level of existing employment opportunities and safeguarded land. The increase in housing

development in Sherburn in Elmet accords with the Plan's objective to balance housing with jobs.

- 3.33 Overall the level of out-commuting which might be argued may increase by way of more housing in Sherburn because of its close association with Leeds is likely to be offset by the potential reduction in potential out-commuting from Tadcaster (to York and Leeds) by way of reduced housing development proposed in that town. The impact would be generally neutral overall in respect of out-commuting as shown in the paragraphs below.
- 3.34 The 2009 SHMA (CD24) (Table B32) shows that both Sherburn in Elmet and Tadcaster towns have the same level of self containment within the District of 57%. The Western sub-area is more self-contained at 50% than the Northern sub-area, which at only 36% is the least self-contained area in Selby District.
- 3.35 Commuters to York are particularly likely to live in the E, NE and N sub areas.
Commuters to Leeds were particularly likely to live in W, Sherburn, N and Central sub areas.
Commuters to elsewhere in West Yorkshire were particularly likely to live in S, W and Tadcaster sub-areas
- 3.36 This indicates that the towns are similarly affected by out-commuting. The Proposed Change to alter the proportions of housing requirement to reduce housing at Tadcaster will likely reduce potential for out-commuting to West Yorkshire and to increase housing at Sherburn in Elmet is likely to increase out-commuting to Leeds. Although the impacts may be felt across the boundary, the effect is expected to be small and overall neutral (there is no specific empirical evidence the Council, can turn to here) so the Council concludes that it is unlikely that there will be a significant impact on at least two planning areas and does not therefore fall within the DTC.
- 3.37 The adjoining LPA statements (at Appendix 4) confirm the Council's view that the re-distribution of housing between Tadcaster and Sherburn-in-Elmet does not have a significant impact.

c) New Green Belt Policy

- 3.38 The Proposed Changes include a strategic policy to review Green Belt and only consider boundary alterations if exceptional circumstances can be demonstrated.
- 3.39 This approach conforms to Policy YH9 of the RSS (specifically part D) and is compliant with the NPPF. The LCR Interim Strategy Statement signs up to the principle of Green Belt review through its endorsement of YH9.
- 3.40 Clearly the Green Belt is a strategic matter in the general planning policy sense and goes beyond administrative boundaries. However only those strategic matters as defined by the LA11 are subject to DTC. Therefore

this section considers whether the Proposed Changes in relation to Green Belt “*would have a significant impact on at least two planning areas*”.

3.41 The Proposed Change only provides the strategic framework within which to undertake a future review which will inform the SADPD. The review may only affect detailed boundaries of those settlements within SDC administrative boundary; it is not a wholesale review of the West Yorkshire and York Green Belts.

3.42 The Council does not consider that the introduction of the new Green Belt policy in the Core Strategy at this stage is a ‘strategic matter’ within the definition of the LA11 as it would not have a significant impact across the boundary with Leeds and York and does not therefore fall within the DTC.

3.43 The Council consulted on the approach to the Green Belt as part of the Core Strategy Proposed Changes Consultation January 2012, as detailed in the submitted Consultation Statement Addendum (CD9a).

3.44 It should be noted that the West Yorkshire Green Belt affects common boundaries between Selby and Leeds, Wakefield, Doncaster and Harrogate only. The York Green Belt affects common boundaries between Selby and York and Harrogate only.

3.45 Two comments were received from affected LPAs and their comments in relation to Green Belt are summarised below:

- North Yorkshire County Council – Objection regarding Policy CP9 (specifically as it relates to the former mine sites) but from a planning perspective the County Council does not wish to make any further comments in relation to the Submission Draft Core Strategy.
- City of York Council - No objections from York. General comments from them welcome the introduction of a new policy on Green Belt and recognise that it will be important to work with SDC at such time that a Green Belt review will be undertaken.

3.46 Further written statements on cross-boundary impacts were received in April 2012 from adjoining LPAs and these are provided in Appendix 4 and summarised below:

LEEDS

- It is Leeds City Council’s view that the emerging Selby Core Strategy is compatible with the emerging Core Strategy in Leeds and does not raise any strategic housing or other implications.

WAKEFIELD

- It is Wakefield Council’s view that the emerging Selby Core Strategy is compatible with the planning framework in Wakefield and does not raise any strategic housing or other implications.

DONCASTER

- It is Doncaster's Council's view that the emerging Selby Core Strategy is compatible with the planning framework in Doncaster and does not raise any strategic housing or other implications.

YORK

- The introduction of a new policy on the Green Belt which seeks to protect the general extent of the Green Belt and control inappropriate development in the Green Belt in your Submission Draft Core Strategy Further Consultation document is welcomed and aligned with City of York Council's approach to the Green Belt. We recognise that it will be important to continue to work with Selby District Council, including at such a time that a Green Belt review will be undertaken.

3.47 These comments confirm the Council's conclusion that proposed change to incorporate a strategic Green Belt policy is not a strategic matter so the DTC does not apply.

3.48 At this stage of policy development the cooperation could not take place in any event; it is only when the review is triggered that full cooperation will commence. At that point it will be possible to identify and assess any significant impacts across two or more planning areas.

3.49 It should be noted that both Leeds and York emerging Core Strategies propose Green Belt reviews. Through the LCR and NY&Y Sub Area Infrastructure Working Groups, each Authority has agreed that they would be part of a Green Belt Working Group for Selby District Council at an appropriate time in the future. This proposal for a new working group reflects the Council's proactive approach in engaging neighbouring authorities in policy development and is a future opportunity for cooperation on strategic issues which might emerge in the course of the review.

4. Evidence Base

4.1 The NPPF states that the Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities; and that local planning authorities should also work collaboratively with private sector bodies, utility and infrastructure providers

4.2 At paragraph 218 it states that "Where it would be appropriate and assist the process of preparing or amending Local Plans, regional strategy policies can be reflected in Local Plans by undertaking a partial review focusing on the specific issues involved. Local planning authorities may also continue to draw on evidence that informed the preparation of regional strategies to support Local Plan policies, supplemented as needed by up-to-date, robust local evidence."

Infrastructure Delivery Plan

- 4.3 The DTC requires cooperation not just with neighbouring authorities but with public bodies too, particularly regarding planning for infrastructure.
- 4.4 The Council has on-going close working relationships with a wide range of public bodies in order to assess infrastructure requirements and potential capacity issues in the light of new development through the LDF process. Regular liaison meetings inform investment decisions and highlight any issues. These are held with for example, the Environment Agency, Yorkshire Water, Highways Agency and the Primary Care Trust.
- 4.5 With particular reference to the consideration of revised housing scale and distribution; following receipt of the recommendations of the Arup Housing Paper (CD56) in November 2011, the Council developed housing number options to be consulted on and contacted the members of the Infrastructure Delivery Plan (IDP) Working Group who are:
- The Environment Agency
 - NYCC Education
 - Arriva Buses
 - NYCC Highways
 - The Highways Agency
 - North Yorkshire and York Primary care Trust
 - Yorkshire Water
 - CE Electric UK
 - National Grid
 - Open Reach (BT)
 - Network Rail
 - Natural England
- 4.6 Specific questionnaires were sent and meetings held to ascertain at the earliest opportunity the local and cross boundary impacts of the proposed changes to the housing figures. The bodies were asked to provide comments on the capacity of settlements to accommodate additional growth in terms of whether the increase in housing numbers would:
- a. Have no significant impact and/or cause no significant problem.
 - b. Have a significant impact
 - c. Have a minimal impact which can be addressed at Site Allocations Stage
- 4.7 This exercise on understanding impacts on capacity of infrastructure raised no concerns over the changes to the housing figures (the

Addendum to the IDP (CD19a) provides a summary) and informed the Proposed Changes prior to consultation. The responses to consultation from LPAs and other public bodies are referenced at Section 3 above.

Strategic Housing Land Availability Assessment (SHLAA)

- 4.8 The Selby District SHLAAs (both in 2008 – CD23-c and 2011 – CD55) were undertaken in compliance with the North Yorkshire sub regionally agreed guidance, which demonstrates cooperation and consistency of approach in assessing the supply side of housing land requirements.
- 4.9 In order to reassess deliverability of the revised housing target, the Council has updated the Strategic Housing Land Availability Assessment Exercise during the suspension. The following engagement was undertaken:
- A four week call for sites exercise was undertaken in October 2011, approximately 200 new sites were received..
 - In order to revise the methodology the Stakeholder Working Group met on the 27th October 2011. The Stakeholder Working Group includes house builders, housing providers and registered social landlords and one of the neighbouring authorities (Wakefield)
 - In November and December 2011 Policy Officers met with the Environment Agency and North Yorkshire Highways Authority to discuss and revise the methodology. Yorkshire Water has also been actively engaged in discussions to revise the methodology.
 - Following assessment of the sites the SHLAA was consulted further in January 2012 and 59 responses were received from stakeholders and landowners.
 - Policy Officers have also been actively engaged in Leeds City Region Meetings, and on 26th January 2012 met to share experience in developing an effective SHLAA Stakeholder Working Group.
- 4.10 Further details of the general approach undertaken and agreements with infrastructure providers can be found within the SHLAA (CD55a).

North Yorkshire Strategic Housing Market Assessment (NYSHMA)

- 4.11 The Council's SHMA was approved in 2009 (CD24). A cross-boundary SHMA undertaken jointly with other North Yorkshire authorities was published in November 2011 during the EIP suspension.
- 4.12 This provides a strategic, county-wide perspective on the issues facing the housing market. The NYSHMA (CD54) assesses projected changes in the housing market at local authority level as well.
- 4.13 The NYSHMA report emphasises that it is intended to form part of the evidence base for identifying future housing requirements. It states clearly that its role is not to provide definitive estimates of future housing need or top-down targets. In recognition of this three different scenarios were

modelled on future housing requirements based on 2008 Sub-National Population Projections (SNPP).

- 4.14 The NYSHMA is a shared evidence base considering cross-boundary issues and has been reviewed as part of the assessment of the revised housing requirement. A further housing context paper provides more details (Arup April 2012 CD56a).

Sustainability Appraisal

- 4.15 In addition to Sustainability Appraisal work being undertaken for the SDCS at each stage of the Plan's development in order to assess social, environmental and economic impacts, specific SA was undertaken as part of the Proposed Changes to the Core Strategy to ascertain if there were any wider sustainability impacts from the increase in the housing target. The SA addendum (CD17h) was published on the Council's website as part of the consultation on the Proposed Changes in January 2012 and outlines how the Proposed Changes to the Core Strategy have been assessed.

Other Cross Boundary Common Evidence Base

- 4.16 It is also worth noting that all the LPAs in the region are signed up to the Regional Econometric Model (REM) for job forecasts which feed into Employment Land Reviews and assessments of future economic forecasts and growth. The District's latest REM forecasts and those of Leeds and York have been reviewed in the housing context paper (Arup, April 2012, CD56a) in so far as they relate to assessing future housing requirements.

5. Conclusions

- 5.1 The majority of the submitted Selby District Core Strategy was subject to examination in public in September 2011 and is therefore not required to demonstrate compliance with the DTC as it was submitted prior to the 15 November and the duty cannot be applied retrospectively. The Council has demonstrated how the development of the SDCS was undertaken under the RSS system and was therefore subject to appropriate strategic co-ordination on cross-boundary issues in that context. It has been suggested that potentially the '3 topics' or Proposed Changes could fall within the remit of the DTC but SDC does not accept this because it does not consider that they fall within the meaning of "the preparation of development plan documents".
- 5.2 However, the Council has reviewed its approach to the Core Strategy Proposed Changes with regard to the DTC and finds, in relation to the 3 topics and related Proposed Changes, that because they do not have or would not have a significant impact on at least two planning areas they do not fall within the definition of 'strategic matters' set out in the Localism Act 2011 and therefore there is no DTC in respect of them for this reason

also. No significant cross-boundary impacts have been identified by adjoining LPAs as well as SDC.

- 5.3 However, the Council is fully committed to co-operation on cross boundary issues. It has demonstrated in this statement how the Core Strategy is in general conformity to the RSS which was the mechanism for tackling strategic, cross boundary issues before the introduction of the DTC.
- 5.4 This statement also shows that the Proposed Changes remain within the SDCS strategy and that remains in conformity with the emerging strategic spatial planning priorities of the region through the LCR Interim Spatial Strategy.
- 5.5 Moreover, the Council has demonstrated that the Proposed Changes have been assessed for their cross boundary impacts through liaison and cooperation with other public bodies on capacity and infrastructure planning as well as adjoining LPAs on commonality of approach to assessing housing requirements and impacts of Core Strategy policies.
- 5.6 While it has to be recognised that it is simply not possible to achieve a fully cooperative approach on specific numbers, it would be imprudent to wait for regional agreement on numbers in the light of the imperative to progress Local Plans to adoption.
- 5.7 In all the circumstances the Council considers that were the DTC to apply, it has demonstrated that it has done sufficient to comply with it.

Appendix 1**Strategic Context and Progression of the Selby District Core Strategy**

Year	Strategic Context	Selby District Core Strategy Timetable
2004	Planning and Compulsory Purchase Act 2004	Structure Plan for North Yorkshire is abolished. Work on Selby LDF begins through Scoping of Sustainability Appraisal.
2006	Examination of Regional Spatial Strategy	Issues & Options Consultation
2007	Draft Regional Spatial Strategy	
2008	Regional Spatial Strategy adopted	Preferred Options Consultation Further Options Consultation
2009	Regional Spatial Strategy Update Consultation	
2010	Integrated Regional Strategy Starts	Consultation Draft Core Strategy
	Coalition Government proposes radical changes to the planning system.	
2011	North Yorkshire & York form a Local Enterprise Partnership.	Publication Draft Core Strategy January 2011
	Localism Act receives Royal Assent	Core Strategy submitted to the Planning Inspectorate 5 May 2011
	Draft National Planning Policy Framework published	Examination hearings September 2011 EIP suspension October 2011
2012	Likely revocation of the Regional Spatial Strategy	Core Strategy Proposed Changes consultation.
	NPPF published March 2012 Planning Policy on Travellers published March 2012	Examination hearings resume April 2012.

Appendix 2 Emerging Regional and Sub Regional; Cooperation since RSS

Level	Forum	Date	Roles / Issues discussed
		2010	
			Following abandonment of Interim Regional Strategy....
LCR City Region Partnership	Yorkshire and Humber Joint Board	2010	<p>City Region Partnership had been working on a city region strand for the wider Yorkshire and Humber Strategy that was being prepared by the Yorkshire and Humber Joint Board. This Board was dissolved and its strategy work ceased following the general election.</p> <p>However the City Region decided that it was important to continue work across the region on a strategy and investment plan that would bring greater coherence to policy and investment activities of the City Region Partnership and would support the development of the city region LEP.</p> <p>The development of the interim strategy statement for spatial planning is seen as part of this wider strategy development activity.</p>
NY&Y	Spatial Planning Board	Nov 2010	Agreed Spatial Planning Assessment for NY&Y which had been jointly prepared by LPAs and LA Leaders Board. Established a common high level approach to spatial planning.
NY&Y	Spatial Planning Board	22 November 2010	Agreed that further consideration should be given to how LPAs would collaborate on strategic spatial planning matters and that TOG should investigate this with Heads of Planning (HOP)
		2011	
Y&NY	Spatial Planning Board	12 January 2011	<p>Re-affirmed support for the work on strategic spatial planning – especially important in the light of DTC in the Localism Bill, the need to align activities of the neighbouring city regions, and need to be clear about investment priorities for the sub region.</p> <p>Agreed Technical Officers Group should consider the value and scope of undertaking a Local Strategy Statement for the sub region - NY&Y Sub Regional Strategy</p> <p>Keen on undertaking further sub regional work on infrastructure delivery as part of the Sub Regional Strategy Statement.</p>

Level	Forum	Date	Roles / Issues discussed
NY&Y	Local Government North Yorkshire and York	28 January 2011	<p>Reported on initial discussions by ChExs in the sub region around a review of thematic boards and other partnership structures.</p> <p>Main drivers for change:</p> <ul style="list-style-type: none"> - Changing context of partnership working inter alia abolition of regional bodies and emergence of local and sub-regional agendas - The complexity and cost of current arrangements <p>Agreed:</p> <ul style="list-style-type: none"> - Minimum number and simplest partnerships structures - A NY&Y approach to county/sub regional partnership structures - Local partnerships including shared community engagement arrangements - The use of task and finish groups to deal with particular issues rather than standing thematic partnerships or sub groups
NY&Y	Spatial Planning Board	March 2011	<p>Cross boundary spatial planning – proposed future arrangements</p> <p>Future role of SPB</p> <p>Draft Local Strategy Statement</p>
LCR	Spatial Planning Board	April 2011	Agreed Interim Spatial Strategy
NY&Y	LG NY&Y	June 2011	<p>NY&Y Sub Regional Strategy agreed.</p> <p>Spatial Planning Board and NY&Y Partnership Unit had been tasked with producing this.</p>
York Sub Area	1 st Meeting of Joint Infrastructure Working Forum	September 2011	<p>DTC – discussion about requirements of the legislation.</p> <p>Focus on what need to achieve:</p> <p>Working collaboratively to go beyond joint evidence but move towards agreed joint priorities.</p>

Level	Forum	Date	Roles / Issues discussed
			<p>Also to include other stakeholders eg HA – a single conversation</p> <p>Establishing joint working –</p> <p>Agree an approach but not necessarily the finer detail.</p> <p>An agreed position – a memorandum of understanding. Accept at different stages and may highlight where LPAs have to agree to disagree.</p> <p>Agree shared objectives would be a good start. And a shared understanding of growth. Strategic level rather than specific numbers.</p> <p>Member involvement.</p> <p>LDF update and information sharing.</p>
York Sub Area	2 nd Meeting of Joint Infrastructure Working Forum	November 2011	<p>LCR Joint Working Arrangements (AH) – consideration of a similar approach in York Sub Area?</p> <p>CIL position / timescales.</p> <p>Identifying shared objectives and cross boundary issues – basis for a Memorandum of Understanding?</p> <p>Highways Infrastructure Assessment – NYCC STIMPS update / York City wide transport model / Getting HA involved.</p>
		2012	
LCR	CIL Working Group	January 2012	<p>Current position on city region work / funding opportunities e.g. WY transport</p> <p>Updates from LPAS / CILs</p> <p>Future scope of collaborative work – addressing the recommendations of the DTZ report</p> <p>Each LPA to identify infrastructure requirements from IDPs</p>
LCR	Spatial Planning Board	2 Feb 2012	Cross boundary planning issues and coordinating and progressing the LEP agenda for planning

Level	Forum	Date	Roles / Issues discussed
LCR	Spatial Planning Board	22 Feb 2012	Prepare an options paper on DTC for Leaders Board
NY&Y	LGNYY	1 March 2012	NYCC exploratory discussion paper for infrastructure mapping for the County.
CYC and others, NYCC	Neighbouring LA invitation	8 March 2012 13 March 2012	City of York invitation for joint evidence base commissioning across NY. NYCC support with potential funding for collaborative project.
LCR	Spatial Planning (Duty to Cooperate) working group	22 March 2012	To provide advice back up to Heads of Planning and Spatial Planning Board regarding way forward on DTC

Appendix 3 LCR Interim Strategy Statement**Agreed by Leaders' Board 21 April 2011****LEEDS CITY REGION
INTERIM STRATEGY STATEMENT****21 April 2011****Background**

In July 2010 the government revoked the approved Regional Spatial Strategy for Yorkshire and the Humber. This decision has been contested through the courts with the result that currently, the RSS remains part of the Development Plan albeit with some uncertainty regarding the weight to be attached to it in decision making. In these circumstances there is considerable uncertainty surrounding the strategic policy framework for spatial planning in the Leeds City Region which addresses those matters that are 'bigger than local' and require collaboration between the Planning Authorities in the City Region.

The Government published the Localism Bill in December 2010 this includes a number of changes to the operation of planning legislation. As expected the Bill includes a 'duty to co-operate' on these strategic issues however this part of the Bill is likely to be subject to amendments and its operation will only become clear once the secondary legislation that gives effect to the duty is published. The Bill also deals with the revocation of regional strategies and associated with this in Clause 89 of the Bill is the revocation of orders that have saved policies from existing development plans (the revocation of saved policies may only apply to Structure Plan policy, a clarification is being sought on this). This will particularly affect those authorities who have yet to complete work on their Core Strategies. It is expected that this Bill will become an Act sometime later in 2011.

In the period before the Localism Bill becomes an Act there is a need for an interim strategy position to help manage the uncertainty on strategic policy and to make clear the continuing support for the policy principles in the RSS that support shared objectives across the City Region. Furthermore depending on the eventual content of the Act there may well be a longer period of time before the Local Planning Authorities can give effect to what ever procedures are put in place in the Act and to address the duty to co-operate and the potential gap created by the loss of previously saved policies

The City Region Partnership had been working on a city region strand for the wider Yorkshire and Humber Strategy that was being prepared by the Yorkshire and Humber Joint Board. This Yorkshire and Humber Joint Board was dissolved and its strategy work ceased following the general election. However the City Region decided that it is important to continue work across the city region on a strategy and investment plan that would bring greater coherence to policy and investment activities of the City Region Partnership and would support the development of the City Region Local Enterprise

Partnership. The development of the interim strategy statement for spatial planning is seen as part of this wider strategy development activity.

Proposed Interim Strategy Statement

The 10 Local Planning Authorities in the City Region Partnership that are required to prepare LDF Core Strategies (NYCC the eleventh local authority is a planning authority in respect of minerals and waste only) have all used the RSS as a starting point for their Core Strategies and support the urban transformation ambition that is at the core of the RSS. Where there are adopted Core Strategies (Harrogate and Wakefield) those documents have a strong policy relationship with the RSS. Authorities who have not yet reached that stage are reviewing the relevance of the RSS approach in their ongoing work on Core Strategies. All authorities recognise that the policies in the former RSS which articulate the urban transformation ambition, should provide the start point for an interim strategy statement. Along with policies that safeguard the environmental assets of the city region and the key spatial investment priorities that are set out in the already agreed city region strategies.

Policy approach in the strategy

The authorities in the partnership continue to support the broad policy thrust of the former RSS and the principles of urban transformation contained in the Plan. To ensure these principles are retained the authorities propose to include the following policies from the approved RSS that address spatial principles in a City Region Interim Strategy Statement.

Spatial Principles

Policy YH1 Overall approach and key spatial priorities (as these apply to the Leeds City Region)

Policy YH2 Climate Change and Resource use

Policy YH3 Working Together (as this applies to the Leeds City Region)

Policy YH4 Regional Cities and sub regional cities and towns

Policy YH5 Principal Towns

Policy YH6 Local service centres and rural (and coastal) areas (as these apply to the Leeds City Region)

Policy YH7 Location of Development

Policy YH8 Green Infrastructure

Policy YH9 Green Belt (as this applies to Leeds City Region)

Thematic Policies

To ensure that the city region's environmental assets are effectively safeguarded the following thematic policies from the RSS will be included in the City Region Interim Policy Statement.

ENV1 Development and Flood Risk

ENV2 Water Resources

ENV3 Water Quality

ENV6 Forestry, Trees and Woodland
ENV7 Agricultural Land
ENV8 Biodiversity
ENV9 Historic Environment
ENV10 Landscape
H4 Affordable housing

City Region thematic strategies

The strategy statement also captures the spatial implications of key strategic investment priorities in the city region, set out below. These priorities should be reflected in Core Strategies and other Development Plan Documents.

Housing and Regeneration Strategy and Investment Plan - This strategy and investment Plan has four Key Priorities for Investment:

- Accelerated strategic growth where investment will support the growth areas in Barnsley Wakefield and Calderdale
- Promoting eco living where investment will support the delivery of:
 - the four Urban Eco Settlements: Aire Valley Leeds, York Northwest, Bradford-Shipley Canal Road Corridor, and North Kirklees / South Dewsbury; and
 - the LCR Domestic Energy Efficiency Programme to eco-retrofit the existing housing stock across the city region.
- Delivering strategic urban renewal which will support the growth and regeneration ambitions in the Leeds-Bradford Corridor, Green Corridor and Kirklees A62 Corridor.
- Supporting rural economic renaissance in the Colne and Calder Valleys

Leeds City Region Transport Strategy - This strategy describes three broad spatial priorities for transport investment:

- Priority A transport links beyond the city region
- Priority B developing the roles of the sub regional cities and towns and priority areas for regeneration and housing growth
- Priority C strengthening the service roles of principal towns

Leeds City Region Green Infrastructure Strategy -The strategy:

- Identifies the value of green infrastructure assets and the case for investing in them
- Ensures green infrastructure complements other city region investment priorities
- Establishes the current priorities for green infrastructure investment
- Impels planning and housing policy work to support widespread improvements in green infrastructure

Further Work to develop the Strategy

Clearly, what is set out is an interim position and there will need to be further work in the context of the commitment to produce a broadly based but economic-led City Region Strategy and Investment Plan.

The RSS included policies on the quantum and distribution of development, which have not been addressed in the interim strategy statement. The local authorities within the city region partnership have all undertaken reviews of the evidence that underpins these policies as part of their plan-making activities. Those authorities that have undertaken reviews in the past 12-18 months have taken account of the local implications of the range of factors that have led to a dramatic slow down in rates of development. These local reviews have led to different conclusions regarding the capacity of an area to deliver development. The partnership will work with individual authorities to help develop our collective understanding of the social and economic factors that are driving the need and demand for development, and the financial, economic and delivery factors that are restricting the ability to meet the need and demand for development. We will use our improved understanding of these factors in the development of a second iteration of the strategy statement that will examine quantum and distribution of development and is expected to form part of the wider economic led city region strategy.

All this work will contribute to a more rounded Strategy Statement

Leeds City Region Secretariat
Regional Policy Team
Leeds City Council
Civic Hall
Leeds
LS1 1UR

Appendix 4**Copy of LPAs written statements re cross boundary issues April 2012****April 2012**

Leeds City Region / LEP

I am writing in response to your request for a view from the City Region Partnership in regard of co-operation on planning issues that cross administrative boundaries.

The Partnership has agreed an Interim Policy Statement at its Leaders Board on 21st April 2011 (copy attached). This statement addresses the approach to accommodating development and, the major investment priorities that have a spatial dimension and have been previously agreed by the Partnership through a number of thematic strategies. The principles in this policy statement that address the approach to accommodating development have been drawn directly from the adopted RSS.

I am satisfied that the Core Strategy is compatible with the principles set out in the Interim Policy Statement

It should be noted that at this point the Partnership does not have mechanisms in place to provide political endorsement for the views set out in this e mail.

Andy Haigh
Planning Policy Manager
Leeds City Region Secretariat

Leeds City Council

Leeds City Council do not consider it necessary to make specific comments about the changes as they do not have any significant impact on Leeds. The scale of the changes is small and Selby is still planning to meet its housing needs within Selby District. As you will be aware Leeds has recently published its Core Strategy Publication Draft which sets out to meet Leeds' housing needs within Leeds' boundaries, without any significant impacts on adjoining authorities.

I hope this email confirms that it is Leeds City Council's view that the emerging Selby Core Strategy is compatible with the emerging Core Strategy in Leeds and does not raise any strategic housing or other implications.

Robin Coghlan

Forward Planning & Implementation
City Development
Leeds City Council

City of York Council

Please see below for requested written statement with regard to Selby's Submission Draft Core Strategy Further Consultation document for inclusion in your Compliance Statement.

City of York Council's Core Strategy Submission (Publication) (2011) delivers sufficient homes to meet needs arising in the local authority. It is acknowledged that there is an overlapping housing market between York and its neighbouring authorities, as would be expected from a city with a tightly drawn unitary boundary and functional hinterland. This has resulted in recognition from all surrounding local authorities of the roles of different places in relation to York. For Selby District Council this has resulted in the continued identification of Selby as a Principle Town with strong functional links to the City of York which is fully reflected in the Selby District Council Submission Draft Core Strategy Further Consultation (January 2012). This approach is supported by City of York Council.

We welcome the additional work that has been undertaken to review your evidence base, albeit we did make comments to make on the Scale of Housing Growth in Selby Final Report (November 2011 Arup) (see representation).

However, the increase in annual housing requirement to 450 dwellings is welcomed as it means that Selby are accommodating their own housing needs and does not impact upon or own Core Strategy.

The introduction of a new policy on the Green Belt which seeks to protect the general extent of the Green Belt and control inappropriate development in the Green Belt in your Submission Draft Core Strategy Further Consultation document is welcomed and aligned with City of York Council's approach to the Green Belt. We recognise that it will be important to continue to work with Selby District Council, including at such a time that a Green Belt review will be undertaken.

Frances Sadler | Development Officer

City of York Council | Integrated Strategy Unit (Forward Planning) | City Strategy 9 St. Leonard's Place | York YO1 7ET

East Riding of Yorkshire Council

I refer to your email below and my previous letter (dated 16 January 2012) in response to the proposed changes to the submission draft Core Strategy.

You will be aware from a consultation held on the emerging East Riding of Yorkshire Core Strategy in October 2011 that East Riding is proposing to increase its housing target from 1,150 dwellings per year to 1,500 dwellings per year. This is based on evidence in the Council's Strategic Housing Market Assessment (2011) as well as consideration of other demographic and economic evidence. I can confirm that we do not expect Selby to meet any of our needs and as such consider your revised housing target - which provides for your own needs - to be consistent with the emerging East Riding Core Strategy. We hope to report our Publication Core Strategy to the Council's Cabinet in May.

For your information we are currently preparing a 'Strategic Context' paper that will set out how the East Riding Core Strategy (in both content and preparation) has considered cross boundary interactions (for example, commuting patterns, retail catchments, travel to work, environmental designations, etc). Our intention is to send this in draft to our neighbouring authorities for comment within the next week so it might also be helpful for your paper. We will also be sending you a copy of the relevant sub-area policies from the emerging Core Strategy that detail some of the key cross boundary issues (such as in Selby's case the Lower Derwent protection area).

I would appreciate any comments that you might have on the Strategic Context paper and draft sub area policies in due course.

Stephen Hunt

Housing and Spatial Strategy Manager
Policy, Partnerships and Improvement

Wakefield Council

Wakefield Council's Local Development Framework Members' Sounding Board considered a report about the Proposed Changes to the Selby Submission Draft Core Strategy on 23 February 2012.

It was not considered necessary to make specific comments about the changes as they do not have any significant impact on Wakefield District. The scale of the changes is small and Selby is still planning to meet its housing needs within Selby District. As you will be aware Wakefield Council is also meeting its housing needs within its boundaries, without any impacts on adjoining authorities.

Wakefield has an adopted Core Strategy that sets out its spatial development strategy and approach to housing, alongside other matters.

Wakefield has also published and submitted a Site Specific Proposals document that identifies sites for new housing and employment land. It is currently being examined and it is anticipated it will be adopted in the autumn.

I hope this email confirms that it is Wakefield Council's view that the emerging Selby Core Strategy is compatible with the planning framework in Wakefield and does not raise any strategic housing or other implications.

Neville Ford

Spatial Policy Manager

Wakefield Council

Doncaster

Please find below a draft response which we will be able to confirm tomorrow;

I can confirm that the Selby Core Strategy has been of interest to Doncaster as a neighbouring authority and has been consulted at various stages. Selby and Doncaster shares a short boundary which is rural in nature. The A19 runs north out of Doncaster into the Selby district providing access to the M62. Doncaster has not identified any specific issues of conflict with the Selby Core Strategy and therefore has not prepared any specific consultation responses to Selby District Council.

Doncaster notes that proposed changes were published between 5 January and 15 February 2012. The changes proposed in the overall housing and employment numbers and also the changes proposed around the Tadcaster area are not expected to have any significant impact on Doncaster.

The 2008 Strategic Housing Market Assessment (SHMA) found Doncaster's housing market is self contained and coterminous with the Borough. Any links that it does have tend to be in the east-west direction along motorway routes. The SHMA found that there was no need to study interaction between Doncaster and Selby. Doncaster is of the view that there has been no new evidence to suggest that the interrelationship since then has changed.

Doncaster's Core Strategy has been the subject of an Examination in Public and the inspector's Report has been received which finds the strategy sound subject to a change regarding the phasing of employment land.

The Council is embarking on an Allocations DPD which and expects to begin public consultation in summer this year.

I hope this email confirms that it is Doncaster's Council's view that the emerging Selby Core Strategy is compatible with the planning framework in Doncaster and does not raise any strategic housing or other implications.

Jeremy Johnson
Policy Manager (Economy & Commissioning),
Economic and Planning Policy,
Directorate of Regeneration and Environment.
