

Appendix A: SHLAA Methodology Working Group Paper & Responses

1. The 2023 SHLAA

The SHLAA is an assessment of sites that may be available for housing development over the next fifteen years. It forms part of the evidence base for the Selby district New Local Plan, by providing an initial assessment of potential housing development sites. The SHLAA includes a number of methodological assumptions which are considered as part of Selby district's 5 Year Housing Land Supply reports. It examines the extent to which potential sites are suitable, available, and achievable over the plan period in a (local planning) "policy off" approach.

The purpose of this consultation document is to give the working group the opportunity to comment on the SHLAA methodology. The assessment will benefit from the experience and expertise of the working group, supporting a robust approach to projecting potential housing supply. This discussion will help provide informed judgements about forecasting supply, which will in the case of 5 Year Housing Land Supply calculations also be balanced against up to date site delivery forecasting / statements.

2. Types of sites in the assessment

- **Selby District Local Plan (2005) Allocations:** Sites allocated for housing in the 2005 Selby District Local Plan, which have since been saved by the Secretary of State and still make up part of the development plan.
- **Selby District Core Strategy Local Plan (2013) Allocation:** In the 2013 Core Strategy, a strategic site was allocated at Olympia Park in Selby for mixed uses including housing. A large part of the allocated site to the west has previously had permission for 863 dwellings (2012/0541/EIA).
- **Large Planning Permission:** These are sites with full, reserve or outline permission for housing developments of 10 units (gross) or more, this can also include applications which have been resolved to grant at planning committees, subject to successful section 106 negotiations, as of the 31st of March 2023.
- **Small Planning Permission:** These are sites with full, reserve or outline permission for housing developments of less than 10 units (gross), this can also include applications which have been resolved to grant at planning committees, subject to successful section 106

negotiations, as of the 31st of March 2023. These sites are only given a basic assessment.

- **Prior Approvals:** The scope of prior approvals can include developments of multiple dwellings. They are not technically planning permissions and so have been included as their own type of site. As these sites are less than 5 dwellings, they are only given a basic assessment.
- **Potential Site:** The potential supply is made up primarily of sites put forward by landowners and developers for consideration through the new Local Plan. They usually take the form of unallocated greenfield land outside of development limits, but include a variety of forms, including land currently allocated for education, employment and other non-housing uses.
- **Approve subject to section 106:** Applications which have been resolved to grant at planning committees, subject to successful section 106 negotiations, prior to 31st March 2023.

Dwellings which are restricted by an agricultural occupancy condition, dwellings which are classified as holiday accommodation and dwellings which comprise 'Granny' annexes are not included in the overall supply, as these are dwellings which are not considered to be available to the general public.

Sites can be several of the above types over time, for example a new site could be put forward for consideration in the Local Plan, and would be classified as a Potential Site, then it could be allocated in a Local Plan and then it could be granted permission. However, a site in the SHLAA can only be one type of site at any one time, so there is no double counting.

Question:

1. **Does the working group agree with these types of sites as a viable source to populate the 2022 SHLAA?**

3. Gross and Net

In the case of planning permissions, there may be dwellings lost on the site through demolitions, mergers of dwellings and changes of use. These are taken account of in the supply and completion of dwellings, which will both be net figures. This is further explained in table 7 below.

4. Net Developable Areas

The net developable area will be used to estimate the area of each allocated or potential site that can be built for housing use only. It is acknowledged by the Council that in order to give an accurate estimate of the housing potential of these sites, this aspect must be taken into account.

We have defined the net developable area as including those access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas (where these are to be provided). Beyond this, it is considered reasonable to exclude the following from the definition of net developable area:

- major distributor roads, significant landscape buffer strips, open space serving the wider surrounding area, or an area necessary to make space for significant water storage in areas of high flood risk;
- an existing on-site feature or wider constraint that limits the area that can be developed, such as the need to maintain an important landscape or wildlife site or historic assets (where they would limit the extent of a site that could be developed); and
- areas comprising non housing development, such as employment, commercial uses, or community facilities (such as new school or health centre)

Table 1b shows the proposed assumptions for the developable area of sites, based on an assessment of different sizes of recently approved and completed sites in Selby district (Appendix A¹ table 1 and summarised below in table 1a). Larger sites tend to have more of their area used for non-housing uses and infrastructure and this is generally why the rates are lower as the site size gets larger. We also intend to give site promoters the option to submit their own assumptions for the developable areas of their sites.

Table 1a - Average Developable areas 2018 - 2023	
Site Size Bracket (ha)	Net developable area ratios (%)
Up to 1	99
1 to 5	88
5 to 10	82
More than 10	78

Table 1b – Proposed Developable areas	
Site Size Bracket (ha)	Net developable area ratios (%)
Up to 1	100
1 to 5	85
5 to 10	80
More than 10	75

Questions:

- 2. Is the definition of developable area appropriate?**
- 3. What are your thoughts on the proposed developable area ratios?**
- 4. Are the brackets of site sizes appropriate?**

¹ The reason for the different year ranges in the tables in Appendix A is to give a big enough sample size for certain categories in the tables such as site sizes, settlement hierarchies and brownfield/greenfield sites etc.

5. Density

The proposed densities in table 2b below are based on an analysis of permitted sites, as seen in Appendix A table 2 and summarised below in table 2a.

Densities have been worked out on the net developable areas of the site. We have found that the only consistent correlation on sites in terms of density is when they are grouped by type of settlement. Please note that sites with planning permissions already have their densities determined and will not be affected.

Table 2a - Average Density 2016 - 2023			
Row Labels	Greenfield	Brownfield	Average
Principal Town - Selby	30	65	53
Local Service Centre - Sherburn	27	34	29
Local Service Centre - Tadcaster	59 ²	43	53 ³
Designated Service Village	27	34	29
Secondary Village	20	21	20
Countryside	30	22	26
Grand Total	26	34	29

Table 2b – Proposed Densities	
Settlement Hierarchy	Densities (dph)
Principal Town (Selby) Brownfield (more than 50% PDL area)	50
Principal Town (Selby) Greenfield (50% or less PDL area)	40
Local Service Centres	35
Designated Service Villages	30
Secondary Village	20
Countryside	20

Questions:

5. Should sites be grouped by other factors?

6. What are your thoughts on the density rates proposed for sites without permission?

7. Are there particular locations which require higher density levels – for example urban brownfield sites?

² This is a high density as there have been limited housing completions on greenfield land in Tadcaster

³ This average density is high given the low number of completions in Tadcaster on both greenfield and brownfield sites.

6. Pre-build lead-in times

This is the amount of time it takes from obtaining planning permission to finishing the first dwelling. The approach taken factors in the size of the site in terms of dwellings, as well as the planning status of the site. The presumptions being that:

- the more advanced along the permission timeline, the shorter the time it takes to start on site, and;
- The bigger the site in terms of units, the longer it takes to negotiate the section 106 agreements.

The proposed lead in times in table 3b, below, are partly based on an analysis of the time it has taken recently approved sites to complete their first unit (seen in table 3a and Appendix A table 3). The proposed lead in times are not set and site promoters have the option to submit their own estimates for lead in times for their sites.

Table 3a - Average of Months between decision and first plot completed 2015 - 2023			
Application Type	1 to 10 Dwellings	11+ Dwellings	Average
REM/FUL	13	17	15
OUT	18	23	21
Grand Total	13	18	15

Table 3b – Proposed Lead in times (Months)		
Type of site	1 to 10 Dwellings	11+ Dwellings
Reserved matters/full planning	12	18
Outline planning permission	18	24
Sites without planning permission	24	30

Question:

8. What are your thoughts on the parameters for the lead in times and on the presumptions we have made?

7. Build rates

An analysis of the rate of completion from a range of developed sites (Appendix A table 4 and summarised in table 4a below) has led the Selby district to propose the build rates in table 4b below. Sites are grouped by size, this is because:

- Larger sites have been shown to be built out at greater rates by major national housebuilders, who have the capacity to do so.
- Smaller sites are generally built out by local builders, who build at a slower rate due to them having a lower capacity.

Table 4a - Average Build Rates 2014 - 2023	
Gross capacity of site (dwellings)	Annual Build rate
1-10	3
11-25	11
26-50	20
51-100	27
101-200	39
201+	49

Table 4b - Proposed Build Rates	
Gross capacity of site (dwellings)	Annual Build rate
1-10	5
11-25	10
26-50	20
51-100	30
101-200	40
201+	50 (70 if 2 developers)
500+	70

Questions:

9. Are the sizes of sites appropriate?

10. Are the build rates appropriate?

11. Should location be factored into the assessment?

8. The assessment questions

Below are the proposed questions which will be included in the assessment of sites in the 2023 SHLAA. These questions have been formulated having regard to the most recent guidance in the planning practice guidance note for Housing and Economic Land Availability Assessments.

In line with the guidance, there will be a basic assessment of housing sites (shown in table 5) and then from this assessment a judgement in principle is made on whether the site is suitable for housing. If the answer is no the site will be put in abeyance. If the answer is yes, then the sites will be assessed in detail with the questions from table 6. Once sites are assessed for their Suitability, Availability and Achievability in table 7 they will be given a deliverability timescale and put into the supply of sites for housing. The methods for the application of these questions will of course depend on what is agreed with the working group.

Table 5 - Basic Assessment Questions	
Question Title	Explanation
SHLAA ID	The unique reference number for the site. This cross-references to the sites shown in the SHLAA maps.
Emerging Local Plan site reference	The unique reference for the site which cross-references to the references used in the Emerging Local Plan consultation documents
Site Submission Reference	The unique reference for the site which cross-references to the call for sites submissions and emerging Local Plan consultation documents.
Parish	The name of the parish the site is located in.
Settlement Hierarchy	Where the settlement is placed in the Core Strategy settlement hierarchy in policy SP4.
Location	Short description of where the site is located
Current land use	Description of the land use of the site.
Surrounding Land Uses	Description of surrounding land uses
Site Type	<ul style="list-style-type: none"> • Selby District Local Plan (2005) Allocation • Selby District Core Strategy Local Plan (2013) Allocation • Large Planning Permission • Small Planning Permission • Prior Approval Not Required • Potential Site • Approve Subject to S106
Allocations Reference/ Planning Permission Reference	<p>Reference should the site be a saved allocation in the Selby District Local Plan (2005) or an allocated site in the Selby District Core Strategy Local Plan (2013).</p> <p>Should the site have planning permission, this is the most recent planning application reference.</p>
Area (ha)	Gross area of the site measured in hectares (ha)
Greenfield/ Previously Developed Land	An indication as to whether the site is greenfield land, previously developed, or a mixture of both

% Greenfield	% of sites area that is greenfield, this will later be used to calculate the number of homes that could be built on greenfield land.
% Previously Developed Land	% of sites area that is previously developed land, this will later be used to calculate the number of homes that could be built on previously developed land.
National Policy Restrictions	<p><i>Minimum Site Size – 0.17ha (less than 5 dwellings at 30 dwellings per hectare)</i></p> <p><i>Sites of Special Scientific Interest (SSSI)</i></p> <p><i>Ramsar Sites, Special Protection Areas (SPA)</i></p> <p><i>Special Areas of Conservation (SAC)</i></p> <p><i>National Nature Reserves (NNR)</i></p> <p><i>Scheduled Monuments, Ancient Woodlands</i></p> <p><i>Health and Safety Executive Inner Zones</i></p> <p><i>Flood Risk areas - Zone 3b 'Functional Floodplain'</i></p> <p><i>Registered Battlefields and Registered Parks and Gardens</i></p>
Suitable for proposed use?	<p>An initial assessment on whether the site is suitable for housing, based on 2 main factors, these being:</p> <ul style="list-style-type: none"> • Relation to the settlement hierarchy • National policy restrictions <p>Sites which are suitable are taken through to be assessed in more detail.</p> <p>Sites with permission automatically go through to stage 2.</p>

Table 6 – Suitability, Availability, Achievability	
Suitability	
Question Title	Explanation
Risk of Flooding	A significant issue for Selby, flooding has been kept separate from other physical constraints. The level of flood risk will be determined by the latest flood risk factors identified in the Council's latest Strategic Flood Risk Assessment.

Physical Constraints	An assessment of any other physical constraints that would need to be overcome through the planning application process e.g. access to the site, infrastructure, proximity to listed buildings and conservation areas, neighbouring uses, proximity of waste water treatment works, drainage options (surface water and foul sewage), topography, mineral designations, etc. ground conditions, hazardous risks, pollution or contamination
Overcoming suitability constraints	A range of potential solutions for any constraints
Availability	
Submitted by?	Whether the site has been submitted by a landowner or an agent, and whether there is a developer involved. This question will not feature any names, addresses or personal details of any kind.
Availability Considerations	Whether the site has a history of unimplemented planning permissions. The number of landowners there are on the site. Impact of the existing land use of the site on availability. Impact of any land ownership constraints or any third party land required.
Overcoming availability constraints	A range of potential solutions for any constraints
Achievability	
Is the site economically viable?	Developer interest in the site can demonstrate that it is economically viable, along with a recent history of planning applications showing developer intent.
Overall Deliverability	Depending on the evidence submitted in the suitability, availability and achievability sections, a site will be given a deliverability timescale, these being: 0-5 years- no constraints to deliverability, or constraints can be mitigated. Units will be projected from the start of the supply period. 6-10 years – constraints have been found that will take time to be mitigated, or the site is part of long term

	<p>phase. Units will be projected from year 6 of the plan period.</p> <p>11-15 years – significant constraints have been found that will take significant time to be mitigated, or the site is part of long term phase. Units will be projected from year 11 of the plan period.</p> <p>Not deliverable – the constraints on the site cannot be mitigated against, and the site is held in abeyance, no units from this site will be projected in the supply.</p>
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Table 7 – Estimating the Development Potential	
Question Title	Explanation
Date of permission	The date the notice of decision was issued, should the site have planning permission.
Permission started?	An indication as to whether works have commenced on-site, should the site have planning permission.
Permission Expiry Date	The date the permission will expire (lapse), should the site have planning permission.
Net Developable area ratio	<p>The area of the site considered purely developable for housing (%)</p> <p>Sites with planning permission have already had their developable area approved through the development management process.</p>
Net Developable area (ha)	The area of the site in hectares (ha) considered developable
Build rate	The annual rate at which dwellings are built out on the site. Where there is more than one developer on site, this will be noted and will increase the rate of building.
Lead in time (years)	The time from the point of approval of a planning application, to the expected completion of the first plot.
Density	The number of dwellings which can be built on the site per hectare (ha) of the site area.

	Sites with planning permission have already had their density approved through the development management process.
Greenfield capacity	Number of units on the site that are estimated to be delivered on the greenfield sections of the site.
Previously Developed Land capacity	Number of units on the site that are estimated to be delivered on the previously developed sections of the site.
Gross capacity	The estimated number of dwellings that can be accommodated onto the net site area. For sites with permission, this number represents the total number of dwellings given by the most recent permission on the site.
Net Capacity	For sites with permission, this will be the gross capacity, minus any demolitions/ mergers/ changes of use associated with the permission that result in the loss of dwellings.
Deliverable Capacity remaining	In the case of sites with planning permission, this figure shows the remaining number of dwellings still to be complete if development has already started. This figure will be the same as net capacity for all other types of sites. Sites assessed as undeliverable will be given zero for this question.
Dwelling projections	A series of cells that project how the units from the site will be built out across the plan period, taking into account the lead in times and build out rates mentioned above.
Development Timescale	How long the site will take to complete all its units in years

Questions:

12. Are these questions appropriate for the assessment?

13. Are there any questions which are unnecessary?

14. Are there any other questions we could include?

9. Next Steps

- The SHLAA working group have until 5pm on Friday 5th May 2023 to make comments.
- An updated finalised methodology (featuring working group comments and our responses to them) will be sent to the working group.
- Sites within the SHLAA will then be assessed with the methodology.
- The results of the assessment will be sent to the working group, who will have 2 weeks to comment.
- The SHLAA will then be used to inform the assessment of the Selby district's housing land supply from the period 2023-24.

Responses to the SHLAA Methodology Working Group Paper

Table 8: Responses from the working group to the methodology		
Respondent	Summary of Comments	Selby DC Response
Charlotte Gill (York Consortium Drainage Boards)	<p>Thank you for the opportunity to comment on the methodology.</p> <p>From the Board's perspective, I can see that the risk of flooding is already included as part of the "Suitability" section but can we ask if drainage options (for both surface water and foul sewage) can be added to the "Physical Constraints" section also please.</p>	<p>Thank you for submitting comments in response to the 2023 Selby district SHLAA Draft Methodology consultation.</p> <p>Your comments have been noted and suggested amendments have been made.</p>
Simon D Jones Esq. (National Highways)	<p>You'll no doubt already have been made aware of the SHLAA response that I made to the Council a few months ago, but it's attached just in case you've not seen it as I sent it back to the consultation INBOX and Caroline.</p> <p>I understand this <i>new</i> consultation probably won't have changed a whole lot from the last one the Council consulted NH on in September; so, I'll assume it just formalises the previous draft consultation I'd already received?</p> <p>However, I won't just resubmit the old response because in the interim period you'll be aware that the Secretary of State for Transport has adopted new legislation regarding impacts on the SRN from development, and so we will take the opportunity to review the SHLAA consultation in line with this and submit a revised response back to you in due course. I expect this will go a little further than our last did, certainly when comes to our position on the suitability of deriving location for housing regarding the SRN and sustainability. The Heronby allocation is a good example of why it is necessary for NH to make a more prominent response on housing methodology moving forwards.....</p> <p>To manage the expectations however, the deadline of 5th May is not a reasonable ask (being only 9 working days), but I note since 1st April that the Selby SCI has now been subsumed in to the existing NYCC SCI - which doesn't address succinctly expectations for consultation responses unfortunately. In the usual spirit of things, I'd expect that our revised response will come to the Council within the next two to four weeks therefore.</p>	<p>Thank you for your response to the 2023 Selby district SHLAA Draft Methodology.</p> <p>We look forward to receiving your updated comments.</p>

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Respondent	Summary of Comments	Selby DC Response
Ben Parks (Savills obo Caddick Group)	<p>Question 1:</p> <p>No. The SHLAA needs to distinguish between Deliverable sites (which can count towards the Five Year Housing Land Supply) and other potential sites. Deliverable sites need to be in the context of the definition of the NPPF:</p> <ul style="list-style-type: none"> a) <i>sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).</i> b) <i>where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.</i> <p>Therefore, Allocations from Local Plans that are over 10 years out-of-date and do not have detailed planning permission should not be considered deliverable unless there is specific clear evidence that housing completion will begin within 5 years, as per the NPPF definition of 'Deliverable'. Outline permissions should also have clear evidence (e.g. a housebuilder on board) to demonstrate the site is deliverable.</p> <p>The Author (Caddick Group) has had historic involvement with Olympia Park. The timescales for delivery of dwellings at this location do not fall within the next 5 years.</p>	<p>Thank you for submitting comments in response to the 2023 Selby district SHLAA Draft Methodology consultation.</p> <p>In line with the NPPF definition of 'Deliverable', any residential allocation from the existing Local Plan will include additional evidence regarding the site's deliverability.</p>
	<p>Questions 2-4:</p> <p>The definition of Developable Area is Appropriate.</p> <p>We agree with the developable area ratios except for those for more than 10 dwellings due to inappropriate bracket sizes, explained below.</p> <p>It is important to consider the effects that requirements for on-site biodiversity net gain will have on reducing the developable areas of all sites. The developable areas of sites from 2018-2023 won't account for this reduction in developable area.</p> <p>There should be a separation of developments between 11-50 dwellings, and for developments between 51-100 dwellings and developments over 100 dwellings.</p> <p>Through our experience of delivering major developments, we consider that major sites (100+ dwellings) lose a large amount of the developable area to additional uses such as open space and landscaping which smaller sites do not. As such we propose an additional two brackets for larger sites explained below:</p> <ul style="list-style-type: none"> ▪ 11-50 dwellings: 75% 	<p>Biodiversity net gain is likely to not always be consistent as sites, such as brownfield sites, are not required to account for BNG. Further, developers also have the opportunity to buy off-site BNG units. Due to these factors, the rates and consistency of developer contributions to BNG are yet undetermined and it would therefore not be appropriate to reduce the net developable area of sites based on these uncertainties at this moment in time.</p>

Table 8: Responses from the working group to the methodology		
Respondent	Summary of Comments	Selby DC Response
	<ul style="list-style-type: none"> ▪ 51-100 dwellings: 70% ▪ 100+ dwellings: 60%. 	The recent data provided in the local area does not represent the suggested recommendation.
	<p>Questions 5-7:</p> <p>Sites are grouped appropriately.</p> <p>Density requirements are not fully reflective of the average densities achieved with the average density in Sherburn in Elmet (where the vast majority of development has been achieved for Local Service Centres) achieving a density of 9 dph lower than the proposed density. This density should be reduced to 30. Similarly, the achieved Greenfield density has been 30, and therefore the proposed density should also therefore be 30.</p> <p>Future densities will be reduced by greater strengthening on building standards, including for climate change and adaptability of dwellings. Densities from 2016-2023 are not reflective of these changes and should be seen as maximum achievable levels.</p>	The proposed densities outlined in Table 2b are averages of sites that have been granted permission between 2016 and 2023, the rates are not set maximums.
	<p>Question 9-11:</p> <p>Sizes are appropriate.</p> <p>Build rates are optimistic for sites over 50 dwellings with each category being rounded up. In particular, the 201+ average is a combination of both sites with 1 and 2 developers on board yet is still lower than the proposed build out rate when there is one developer on board. We recommend reducing this build rate with one developer on board to 40. There is limited difference between sites 101-200 dwellings and those that are 200+ if only one developer is on board.</p> <p>Location should not be factored into the assessment</p>	In order to analyse the data forensically the presence of two developers on a site must be taken into account. Two developers present on a site result in quicker built out of the site, particularly when developing two different products.
	<p>Questions 12-14:</p> <p>We think the questions are necessary and appropriate. There are no further questions we would suggest.</p>	Comments noted.

Table 8: Responses from the working group to the methodology

Respondent	Summary of Comments	Selby DC Response
James Langler (Historic England)	<p>Thank you for consulting Historic England on the above document. Please find below our comments on the draft SHLAA Methodology Working Group Paper 2023.</p> <p>We welcome the reference made to the potential for historic assets on a site to reduce the net developable area. This decision will need to be made on a case by case basis, giving careful consideration to the nature, extent and significance of the heritage asset, or assets, in question. We also welcome the inclusion in Table 5 – Basic Assessment Questions of Scheduled Monuments, Registered Battlefields and Registered Parks and Gardens as national policy restrictions. However, at present, it is unclear where the implications of a site containing one or more listed buildings, or being located within a conservation area, would be considered in the assessment of the suitability/achievability of a site. As the presence of these categories of designated heritage assets may not necessarily preclude a site from development but may place restrictions on what can be delivered, it would seem sensible to consider them as a potential constraint under the ‘Suitability’ section of Table 6.</p>	<p>Thank you for submitting comments in response to the 2023 Selby district SHLAA Draft Methodology consultation.</p> <p>Your comments have been noted.</p> <p>Heritage Assets are considered under physical constraints and a range of possible solutions are recommended in the questions ‘Overcoming suitability constraints’. This will be more clearly outlined within the methodology as suggested.</p>

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Respondent	Summary of Comments	Selby DC Response
Jim Smith (Forestry Commission)	<p>Thanks for this, I have briefly scanned the attached methodology and can see that Ancient Woodlands are to be considered in the draft methodology.</p> <p>Just to highlight this reference to Ancient Woodlands should refer back to Forestry Commission / Natural England Standing Advice for Ancient Woodlands : https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions</p> <p>We have responded back in 2021 to the Selby Local Plan via the Woodland Officer covering the Selby area at the time most of this information is still relevant today therefore please see attached email and consultation response.</p> <p>If you need to know more about the role of FC in planning please the following : https://www.gov.uk/guidance/planning-applications-affecting-trees-and-woodland.</p> <p>Could any consultations coming from North Yorkshire County Council please come through the YNE email account : yne@forestrycommission.gov.uk (cc) as I am transitioning into a new job and my work will be picked up by a colleague that is replacing me in due course. I have raised with your NYCC colleagues in Scarborough but aware we get little or no planning consultation emails from NYCC areas such as Ryedale, York so appreciate if you could spread the word on how to contact the FC in the NYCC area.</p>	<p>Thank you for submitting comments in response to the 2023 Selby district SHLAA Draft Methodology consultation.</p> <p>Your comments have been noted and the correct email account has been shared with colleagues.</p>
Melanie Lindsley (The Coal Authority)	<p>Thank you for your notification received on the 21st April 2023 in respect of the draft SHLAA Methodology Paper.</p> <p>Within the Selby district our records indicate that there are recorded coal mining features present at surface and shallow depth including; mine entries and reported surface hazards. These features may pose a potential risk to surface stability and public safety.</p> <p>As you will be aware we provide the LPA with downloadable data in respect of Development Risk plans for the area so that you can see those parts of the district where coal mining features are recorded as being present at surface and shallow depth. We would expect this data to be used when assessing sites for potential allocation for future development. The presence of features, such as recorded mine entries and their zones of influence, may impact the quantum of development that can be accommodated on a site.</p>	<p>Thank you for submitting comments in response to the 2023 Selby district SHLAA Draft Methodology consultation.</p> <p>Your comments have been noted.</p>

Table 8: Responses from the working group to the methodology		
Respondent	Summary of Comments	Selby DC Response
	It is noted that Table 6 – Suitability, Availability, Achievability, includes ground conditions within the Physical Constraints questions. In response to Question 12, I do not consider that the questions posed are inappropriate for the assessment. This is based on the assumption that land instability will be a consideration of the ground conditions question.	
John Londesborough (obo Vistry Group (Bovis and Linden) & Countryside Partnerships)	<p>Please find below a response on behalf of Vistry Group to the SHLAA methodology consultation for Selby. Please note that the Vistry Group now includes Countryside Partnerships. Therefore, this response is provided on behalf of both Vistry Homes (Bovis and Linden) and Countryside Partnerships.</p> <p>1. Does the working group agree with these types of sites as a viable source to populate the 2022 SHLAA? Vistry agrees in principle with the proposed types of sites to be included within the SHLAA. However, we note that any “Potential Site” needs to be considered developable in the context of the NPPF before it can be counted towards the total housing land supply identified by the SHLAA.</p>	<p>Thank you for submitting comments in response to the 2023 Selby district SHLAA Draft Methodology consultation.</p> <p>Comments noted.</p>
	<p>2. Is the definition of developable area appropriate? The definition of developable area should not include “incidental open space and children’s play areas”. These areas are not normally included when calculating the capacity of a site as they do not form part of the residential element of the development. If they are included in the net developable area, then the true capacity of the site could be overstated.</p>	The SHLAA methodology makes a clear distinction between strategic uses that are needed to support the wider area and uses for direct residential amenity. The Council considers open space and children’s play areas as direct residential amenity and are therefore included within the net developable area calculations.
	<p>3. What are your thoughts on the proposed developable area ratios? See comment on Question 4 below.</p>	
	<p>4. Are the brackets of site sizes appropriate? It is considered that the “Site Size Bracket” for more than 10 dwellings should be split down into additional brackets as the developable area ratios can vary considerably in developments over this size. A large SUE or new settlement of 1,000+ units (as are proposed in the emerging Local Plan) are likely to have developable areas closer to the 50-60% range once all new infrastructure is taken into account. For example, Countryside’s masterplan for the Selby Cross Hills</p>	The data used is comprised of sites with planning permission. It would be inappropriate to use sites that have yet to be granted permission as they cannot yet be considered as

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	<p>proposal (emerging allocation SELB-BZ) demonstrates how the proposed residential developable area (totalling 1,270 dwellings) constitutes 59% of the total site area once open space and land for a school is factored in. Countryside therefore proposes that further evidence is gathered relating to the developable area of larger developments and consideration is given to including additional brackets for the size of site considered. These could be: 10-99, 100-499, 500-999, 1,000+.</p>	<p>compliant as the developable area of the site is not yet fully determined.</p> <p>The data provided shows larger sites developable area rates to be within the 75-95% range. Due to this it would not be appropriate to include additional site size brackets as recommended.</p> <p>The site size brackets are considered to be appropriate as they represent the most common site types for a rural area.</p>
	<p>5. Should sites be grouped by other factors? Although it is noted that sites within the Principal Town of Selby are to be categorised depending on whether they are Greenfield or Brownfield, the same distinction has not been made for other settlement types. Given the evidence demonstrates that each settlement is likely to provide varying capacity on greenfield and brownfield land, it would be appropriate to distinguish between greenfield and brownfield sites in all settlement types within the hierarchy. If an average density is applied to both site typologies the capacity of individual sites may be under or overestimated.</p>	<p>Selby is the only settlement that has significant areas of brownfield. It is recognised that a small number of windfall brownfield sites will come forward within other settlements however, due to the small number of these sites, it is not appropriate to categorise other settlements in this manner.</p>
	<p>6. What are your thoughts on the density rates proposed for sites without permission? As above, the density rates applied to sites without permission should be amended to take into account whether a site is greenfield or brownfield in all settlement types. A different rate based on the available evidence should be applied to both within their settlement type.</p>	<p>Selby is the only settlement that has significant areas of brownfield. It is recognised that a small number of windfall brownfield sites will come forward within other settlements however, due to the small number of these sites, it is not appropriate to categorise other settlements in this manner.</p>
	<p>7. Are there particular locations which require higher density levels – for example urban brownfield sites? As above, urban brownfield sites in settlements other than</p>	<p>Selby is the only settlement that has significant areas of brownfield. It is</p>

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	Selby should be considered in the context of the higher densities demonstrated by the Council's own evidence.	recognised that a small number of windfall brownfield sites will come forward within other settlements however, due to the small number of these sites, it is not appropriate to categorise other settlements in this manner.
	<p>8. What are your thoughts on the parameters for the lead in times and on the presumptions we have made? Although the lead in times appear sensible for the size of sites listed, further consideration should be given to the potential lead in times for larger sites given the scale of some development proposed in the emerging Local Plan. As an example, the Lichfields <i>Start to Finish, Second Edition</i> report, which was compiled in 2020, finds that sites of 1,000-1,499 units can take 4.6 years to gain full planning approval, with a further 2.3 years before units are delivered post permission. The time periods are longer for the larger sites (please see report at https://lichfields.uk/media/5779/start-to-finish_what-factors-affect-the-build-out-rates-of-large-scale-housing-sites.pdf). Additional site brackets for larger sites with longer lead-in times should be considered to provide a more realistic indication of when the larger proposals are likely to begin delivering homes.</p>	<p>Lichfields' Start To Finish Report has been utilised, however it is also considered local, recent information is of great importance.</p> <p>The data provided utilises recent information on lead in times, however it is recognised that each site is different, and this is why site promoters, agents and landowners are allowed to submit their own lead in times during the consultation process.</p>
	9. Are the sizes of sites appropriate? See answer to question 10 below.	
	<p>10. Are the build rates appropriate? Vistry does not agree with the assumption that all potential sites of more than 201 dwellings in size should be assumed to have two developers involved delivering 70 units per annum. The evidence does not appear to support this assumption, with the majority of the sites of 201+ units in the LPA area delivering between 30 and 46 dwellings per annum (Hodgsons Lane in Sherburn is considered an anomaly as it is a largescale 100% affordable housing scheme built using modern methods of construction allowing for accelerated delivery). In our experience, it is unlikely that a site of less than c.500 dwellings would have more than one developer/outlet on site at any one time. If the LPA is to assume, delivery of 70 dwellings per annum from two or more outlets, we would suggest a further site size category of 500+ units is included.</p>	Comments noted and amendments made as suggested.

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	<p>11. Should location be factored into the assessment? It is considered that certain areas of the district are likely to yield faster delivery rates than others, particularly those that are well connected to the strategic road network and public transport. Further analysis would be required to support this assumption in the SHLAA.</p>	From the data there is no correlation between location and the rate at which a site is built out.
	<p>12. Are these questions appropriate for the assessment? The questions are appropriate for the assessment.</p>	Comments noted.
	<p>13. Are there any questions which are unnecessary? All questions appear reasonable and necessary.</p>	Comments noted.
	<p>14. Are there any other questions we could include? Vistry does not consider any additional questions are required.</p>	Comments noted.
Sharon Jenkins (Natural England)	<p>We recognise that SHLAAs form a critical component of the evidence base for Local Plans. In order to allocate the most appropriate sites to deliver high quality, sustainable development, environmental issues and opportunities should be considered as an integral part of the assessment process.</p> <p>Natural England does not have available staff resources to provide bespoke advice on SHLAAs or attend meetings in connection with them. In line with the National Planning Policy Framework, we offer the following generic advice on key natural environment considerations for use in producing or revising SHLAAs, which we hope is of use.</p> <p>1. Landscape</p> <p>Avoiding harm to the character of nationally protected landscapes - National Parks, the Broads and Areas of Outstanding Natural Beauty - and locally valued landscapes.</p> <p>Impacts of new housing upon landscape may be positive or negative, direct or indirect, short or long term and reversible or irreversible. Cumulative impacts may also occur as a result of the combined effects of more than one housing development.</p> <p>The assessment of potential housing sites should be informed by the landscape character approach. The National Character Area (NCA) profiles will provide useful information. These update the national framework of Joint Character Areas and Countryside Character Areas that are used to inform LCAs. Further information is available at NCAs</p>	<p>Thank you for submitting comments in response to the 2023 Selby district SHLAA Draft Methodology consultation.</p> <p>Your comments have been noted.</p>

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	<p>Landscape Character Assessments (LCAs) identify the different landscape elements which give a place its unique character and can help inform the location and design of new development. Further information on LCAs is at Landscape Character Assessment.</p> <p>More detailed study (e.g. Landscape and Visual Impact Assessment) of the sensitivity of the landscape and capacity to accommodate change may be necessary to determine the suitability of potential housing sites, particularly those within or near protected landscapes.</p> <p>2. Biodiversity Avoiding harm to the international, national and locally designated sites of importance for biodiversity. International sites include: Special Protection Areas (SPAs); Special Areas of Conservation (SACs) and Ramsar sites¹. National sites include biological Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) Local sites are Local Wildlife Sites (a variety of other terms are also in use).</p> <p>The following wildlife sites should also be given the same protection as European sites: potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites</p> <p>The potential impacts of new housing upon such sites may be positive or negative, direct or indirect and short or long term. Cumulative impacts may also occur as a result of the combined effects of more than one housing development. Indirect impacts may be experienced several kilometres distant from new housing e.g. water pollution. The key to assessing these is to understand the potential impact pathways that may exist between the development and sensitive sites.</p> <p>Impact Risk Zones (IRZs) are a GIS tool that can be used by LPAs to consider whether a proposed development (or allocation) is likely to affect a SSSI. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. Information about using this data can be found here.</p> <p>The Magic website is a useful source of information on the location and qualifying features of the international and national designations. Local Environmental Records Centres should also be of assistance and often hold information on Local Wildlife Sites.</p>	

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	<p>Avoiding harm to priority habitats, ecological networks and priority and/or legally protected species populations</p> <p>Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here UK BAP priority species and habitats.</p> <p>Protected species are those species protected under domestic or European law. Further information can be found here Standing advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.</p> <p>Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds.</p> <p>Priority habitats can be found on the Nature on the Map website referred to above. Natural England does not hold records of priority or legally protected species but Local Records Centres may be able provide these.</p> <p>It may also be necessary to undertake a basic ecological survey in order to appraise the biodiversity value of any potential development site. A Phase 1 Habitat Survey is the commonly used standard for habitat audit and provides a starting point for determining the likely presence of important species. More information is available here Phase 1 Habitat Survey.</p> <p>Seeking opportunities to contribute to the restoration and re-creation of habitats, the recovery of priority species populations and biodiversity enhancement. Where Nature Improvement Areas (NIAs) are identified they can provide a focal point for creating more and better-connected habitats.</p> <p>Where housing allocations are proposed in the environs of NIAs the potential to contribute to habitat enhancement should be considered. Further information on NIAs is available here NIAs.</p> <p>Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area. Further information through the UK BAP link above. Seeking opportunities to enhance and create Green Infrastructure</p>	

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	<p>Green infrastructure is a term used to refer to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.</p> <p>Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification. Green infrastructure maintains critical ecological links between town and country.</p> <p>The SHLAA should consider the availability of GI and opportunities to enhance GI networks when considering sites for development.</p> <p>3. Geological conservation Avoid harm to nationally and locally designated sites of importance for geological conservation - geological SSSIs and Local Geological Sites (also known as RIGS - Regionally Important Geological Sites).</p> <p>The Nature on the Map website referred to above is a useful source of information on the location and qualifying features of geological SSSIs. Local Environmental Records Centres should also be of assistance and often hold information on Local Geological Sites.</p> <p>Housing development may present opportunities for the enhancement of geological sites e.g. exposure sites in road cuttings. Further information on geological conservation is available on the Natural England website here Geodiversity.</p> <p>Seeking opportunities to contribute to landscape restoration and enhancement.</p> <p>The NCAs profiles identify potential opportunities for positive environmental change. LCAs also identify opportunities for landscape restoration and enhancement. These can help identify potential opportunities for housing developments to contribute to landscape enhancement in an area.</p> <p>4. Best and Most Versatile Agricultural Land Avoiding Best and Most Versatile Agricultural Land</p>	

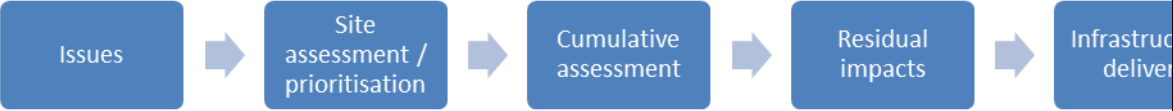
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	<p>Land quality varies from place to place. Information on Best and Most Versatile Agricultural land (grades 1,2 and 3 a) is available from the Agricultural Land Classification (ALC). ALC maps are available on the MAGIC website. Not all land has been surveyed in detail and more detailed field survey may be required to inform decisions about specific sites. Further information is available here ALC.</p> <p>5. Public rights of way and access Seeking opportunities to enhance public rights of way and accessible natural green space. Housing allocations should avoid adverse impacts on National Trails and networks of public rights of way and opportunities should be considered to maintain and enhance networks and to add links to existing rights of way networks including National Trails. More information is available here National Trails.</p> <p>Accessible natural greenspace should be provided as an integral part of development. Housing should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 96 of the NPPF. Natural England’s work on Accessible Natural Greenspace Standard (ANGSt) may be of use in assessing current level of accessible natural greenspace and planning improved provision.</p> <p>Existing open space should not be built on unless the tests of NPPF para 97 have been met. Open space is construed in the NPPF as all open space of public value which offer important opportunities for sport and recreation and can act as a visual amenity.</p>	
Simon Jones (National Highways)	<p>We note that the SHLAA forms part of the evidence base for the new Local Plan and provides an initial assessment of potential housing development sites examining the extent to which they are deemed suitable, available, and achievable over the next 15 years. A methodology is presented to consider the Council’s five-year housing land supply, and the main purpose of this consultation is understood to be to give the consultees the opportunity to comment on the methodology.</p> <p>As you will know, we have been working with Selby District Council (SDC) on their Local Plan and the site allocations contained within, with a particular focus on the strategic allocation at Heronby, Land to the South of Escrick Road, Stillingfleet (allocation: STIL-D).</p> <p>Given that the SHLAA forms part of the evidence base for the new Local Plan, we have responded to this consultation on the assumption that the sites included within the Local Plan match those included in the database you have previously supplied. <u>Please inform us if this is not the case</u> and, in particular, please highlight any new sites which are not being considered as part of the emerging Local Plan and why they may be considered as part of the SHLAA.</p>	<p>Thank you for submitting comments in response to the 2023 Selby district SHLAA Draft Methodology consultation.</p> <p>All sites submitted as part of the ‘Call for Sites’ exercise that ended in March 2021 are entered into the SHLAA along with sites submitted by land owners and agents outside of the Call for Sites process.</p>

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	We would comment on the SHLAA methodology as follows:	
	<p>Previous Consultation</p> <p>We responded to a previous consultation from Selby District Council on a draft SHLAA methodology in August 2022. In summary, we previously noted:</p> <ul style="list-style-type: none"> The importance of the DfT Circular 02/2013 “The strategic road network and the delivery of sustainable development” which informs our position on development and included some key text from this document, including Paragraph 9 and 34 	Comments noted.
	<ul style="list-style-type: none"> Set out our approach in engaging in the development process and specifically the importance of sustainable travel options, how development locations should be promoted at locations that are or can be made sustainable to minimise the need to travel and support wider social, health and economic objectives 	Comments noted.
	<ul style="list-style-type: none"> Questions 1 to 11 are less relevant to us but noted how we were keen to contribute our views on the questions in Table 6, which are proposed to assess the suitability, availability and achievability of sites With regards to Table 6, we raised concerns that there was only one question covering a wide range of topics related to the sustainability of sites Considering the above point, and the imperative faced with decarbonising transport, we suggested a separate question which considers the sustainability of each site in terms of its ability to limit the need to travel and offer a genuine choice of transport mode to ensure that these key factors are not overlooked as part of the site assessment We suggested that the Council may want to define what is ‘sustainable’ in a transport sense Key questions in Table 6 could cover access to local facilities and access to existing active and public transport networks <p>We have reviewed the 2023 SHLAA Methodology Working Group Paper and would note that our previous recommendations have not been taken into account and that the contents of Table 6 are unchanged.</p>	The purpose of the SHLAA is to assess sites using a high level but broad criteria. The SA for the Selby Local Plan assess’ matters like these in detail. The SA for the new Selby Local Plan can be found here: https://selby-consult.objective.co.uk/kse/event/37045
	<u>Updated planning policy: DfT Circular ‘Strategic road network and the delivery of sustainable development’</u>	Comments noted.

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	<p>You may be aware that, since issuing our previous response, the Department for Transport released a new document setting out the policy of the Secretary of State in relation to the Strategic Road Network (SRN) on 23 December 2022. The document, entitled “Strategic road network and the delivery of sustainable development”, (and referenced as DfT Circular 01/2022), replaces the policies in the Department for Transport (DfT) Circular 02/2013 of the same title with immediate effect.</p> <p>We would refer the Council to the policy document and we would recommend that you read this to gain the full detail and context. The document can be accessed online: https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development/strategic-road-network-and-the-delivery-of-sustainable-development.</p> <p>With regards to the SHLAA consultation and all future consultations, the policies set out in the Circular must be applied and it should be noted that the Circular will always take precedence over the National Highways document ‘The Strategic Road Network Planning for the Future’ (2015) which is due to be amended in accordance with the new Circular.</p> <p>The new Circular 01/2022 does not supersede our previous points, but instead places more emphasis and importance on the need for the SHLAA methodology to assess the extent to which each site meets the requirements of the Circular which include but are not limited to:</p> <ul style="list-style-type: none"> • New development should facilitate a reduction in the need to travel by private car • New development should be focused on locations that are or can be made sustainable • Developments should maximise walking, wheeling, cycling, public transport and shared travel opportunities (these need to be exhausted before considering options for new connections to the SRN) • For residential-led developments, due consideration should be given to home and street layouts, broadband infrastructure, safe and secure cycle parking, and access to local amenities and open space in support of these aims, while mobility or micro mobility hubs should be provided in larger schemes • Local plans and spatial development strategies should be underpinned by a clear and transparent evidence base which informs the authority’s preferred approach to land use and strategic transport options, and the formulation of policies and allocations that will be subject to public consultation 	<p>The purpose of the SHLAA is to assess sites using a high level but broad criteria. The SA for the Selby Local Plan assess’ matters like these in detail. The SA for the new Selby Local Plan can be found here: https://selby-consult.objective.co.uk/kse/event/37045</p>

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	<p>We would therefore reiterate our recommendation that the SHLAA methodology includes a separate question(s) which considers the sustainability of the site in terms of its ability to meet the above requirements. This may ensure that these key factors are not overlooked as part of site assessment.</p>	
	<p><u>Wider Considerations</u></p> <p>We would welcome clarification on how the Selby SHLAA methodology sits within the planning policy context of the geographical area, for example is the updated Selby SHLAA to become a North Yorkshire Council methodology, or will each local area have its own SHLAA methodology? If the latter, we would welcome clarification on how a consistent approach between each local area will be achieved.</p> <p>Generally, we would expect a SHLAA and the accompanying methodology to inform the Sustainability Appraisal Report (SAR) and we would therefore query whether the existing SAR for the Selby district, dated January 2021, is to be updated in line with the outcome of this consultation. We acknowledge that the SAR is not the subject of this consultation and so we have not reviewed this report in detail, however we would note that we have recently reviewed and responded to the Ryedale District Council Sustainability Appraisal Scoping Report and Framework (SACRF).</p> <p>While we did recommend changes be made to the SACRF, we did welcome the fact that the document went some way to reducing the need for private car usage and understanding the site-based opportunities and constraints in relation to sustainable transport. For example, the document asks questions around accessibility, and sites are scored depending on the time taken to walk to key services and facilities, such as public transport and education facilities.</p> <p>We would recommend that you could engage under the new unitary banner with Ryedale in order to share what has so far been seen as 'good practise' and to consider whether some of their site assessment methodology would be applicable to Selby. Please consider our response to the Ryedale DC SACRF when doing so.</p>	<p>Each of the former District and Borough Councils that make up the new North Yorkshire Council will keep individual housing targets until a new Local Plan that covers all of North Yorkshire is adopted in 2028. Until then, the former District and Borough Councils will continue to produce their own Strategic Housing Land Availability Assessment (SHLAA) and 5 Year Housing Land Supply.</p>
	<p>With regards to the wider Local Plan process, it is recommended the following steps are followed, in line with the comments made within the letter. National Highways would support continuing engagement on the Plan to ensure the above policy requirements and the below process are appropriately integrated to the progression of the Plan.</p>	<p>Comments noted.</p>

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	 <pre> graph LR A[Issues] --> B[Site assessment / prioritisation] B --> C[Cumulative assessment] C --> D[Residual impacts] D --> E[Infrastructure delivery] </pre> <ul style="list-style-type: none"> • Issues: Identify key transport provision and accessibility issues (circular para 33). • Site assessment / prioritisation: Promote developments that are or can be made to be sustainable and maximise sustainable opportunities (circular para 13). Support local facilities and sustainable transport networks (para 16). • Cumulative assessment: Provide a robust evidence base (para 33). Explore opportunities to reduce reliance on the SRN for local journeys (para 31) and to shift demand into less carbon-intensive forms of travel (para 33). Identify how issues can be addressed by the Plan (para 33). • Residual impacts: Exhaust sustainable options before considering need for new connections to the SRN (para 19) and consider managing down impact by virtue of sustainable options and improvements to the local road network as a preference (para 23). • Infrastructure delivery: The plan must not compromise the SRN function (to enable the long-distance movement of people and goods) and should not be relied upon for site accessibility (para 28). The evidence base will inform the Infrastructure Delivery Plan to demonstrate that the planned growth and the required supporting infrastructure is deliverable (para 34), including a clear funding mechanism to be secured by a policy in the Local Plan (para 29). 	