From: <u>Stuart Natkus</u>

To: elspeth fowler; James Hall
Cc: paul.butler@barratthomes.co.uk
Subject: RE: Council"s Statements
Date: 04 October 2011 15:34:49

Dear Elspeth

SELBY DISTRICT COUNCIL POSITION STATEMENT ON THE TREATMENT OF BARLBY/OSGODBY, BRAYTON AND THORPE WILLOUGHBY IN THE SETTLEMENT HIERACHY

Following the final scheduled session of the Selby Core Strategy Examination in Public held on Friday 30 September I note that the Inspector did not close the Examination in light of the Councils request for an adjournment, which is to be considered this week.

On behalf of Barratt and David Wilson Homes I write to make further representations with regards the Councils position statement on the 'Treatment of Barlby/Osgodby, Brayton and Thorpe Willoughby in the settlement hierarchy' dated 28 September 2011.

This position statement was issued as a result of debate on Matter 2, whereby the Council were invited to reconsider the role of the above settlements, specifically with regards to whether adequate guidance is contained in Policy CP1 in relation to the future role of the villages.

Policy CP1A designates a number of settlements as Designated Service Villages (DSVs), with a proportion of the overall housing target distributed amongst them. Policy CP1A confirms the settlements as DSVs as they have 'some scope for additional residential and small-scale employment growth to support rural sustainability'. Furthermore in the case of the aforementioned villages they are also considered appropriate 'to complement growth;' It is therefore clear from this policy that the three villages around Selby are allocated as DSVs due to their ability to support rural sustainability and also have the ability to provide additional accommodation to complement growth in Selby.

This approach is confirmed in the Councils Position statement at paragraph 2.2 which confirms that,

'It is acknowledged that the three villages (Barlby/Osgodby, Brayton and Thorpe Willoughby) might be expected to accommodate future housing growth in excess of the level that would be appropriate in other villages owing to their greater sustainability and closer proximity to Selby.'

Furthermore paragraph 2.3 if the Position statement confirms that,

'the three villages are specifically referred to by name in Policy CP1 and are treated differently to the other Designated Service Villages by the expressed recognition of the scope for growth in them to complement growth in Selby.'

These views expressed by the Council are not in debate and the recognition that the three villages are considered to provide a larger percentage of housing than the remaining DSVs in principle, is welcomed and fully supported by Barratt and David Wilson Homes.

The main concern of Barratt and David Wilson Homes relates to the vagueness of policy CP1 and the lack of methodology to ensure that the proposed extra growth in the three villages is delivered in later DPDs. The Council maintain in the position statement that there is no requirement for a separate tier of housing and that the precise scale and location of development should be taken through the Allocations DPD. In relying upon this the Council confirm that the current site Allocations DPD Preferred Options document designates 39% of planned growth in DSVs to the three villages.

It is acknowledged that the Allocations DPD is not for debate in this process, however as the Council have referenced it as an evidence base and as a delivery method for the additional growth in the three villages it is considered important to highlight its contents in this respect in order to firmly demonstrate that the current wording of Policy CP1 provides insufficient guidance on increasing growth in these settlements to ensure that Policy CP1 is interpreted as the Council acknowledge it should be, i.e. additional housing in the three villages over and above the other DSVs.

The Council have stated that 39% growth will occur in the three villages as proposed in the Allocations DPD with reference to the Housing Distribution Sub Total table on p17 of the preferred options document, a copy of which is attached for ease of reference.

This table does confirm that 621 of the 1573 new dwellings will be located in the three villages, providing for 39% of the proposed housing distribution. However, when assessed against the current and overall distribution it is clear that this figure only marginally alters the overall distribution levels. Assessing the first column of figures, which highlights the number of dwellings at 2011, shows that 5567 of the 16031 dwellings are located in the three villages, equating to 35% of the overall distribution. When assessing the final number of dwellings proposed, i.e. the 2011 figures plus the proposed 1573 the three villages provide 6188 out of 17064 dwellings overall, equating to 36%, only a 1% overall increase in spatial distribution.

More importantly however is the fact that this table shows no alternative method of calculating distribution in the three villages to any of the other DSVs despite the clear assurances in the Councils position statement that the three villages are 'treated differently to other Designated Service Villages by the expressed recognition of the scope for growth in them to complement growth in Selby.' The methodology utilised in the Allocations DPD, the document which the Council purport to rely on to deliver the different treatment of the three villages fails to do so by apportioning housing in exactly the same way to all DSVs.

Indeed perversely this methodology does not provide the largest proportionate growth in the three villages; the Allocations DPD provides Riccall with the largest proportional increase of 13%. The three villages do grow by 11%; however this is only marginally greater than numerous other settlements that have 8, 9 and 10% growth.

In conclusion the Council acknowledge that the three villages are intended to be elevated above other DSVs, however rather than be allocated a separate tier in the settlement hierarchy the Council consider the wording of Policy CP1 will guide an increase in housing distribution through the Allocations DPD. It is however clear from the Allocations DPD Preferred Options that this intention is not adequately expressed in Policy CP1 to ensure it is carried through into the spatial distribution calculations, whereby the evidence shows that no different treatment is given to the three villages and no increase in growth provided as expressed in Policy CP1 and the Councils position statement. It is therefore clear that the current wording of CP1, although identifying an intention to increase the distribution of the DSVs to provide additional housing in the three villages, does not provide a deliverable methodology for doing so and either needs to be reworded to do so or include a separate tier for the three villages to ensure that the intention is delivered in the Allocations DPD.

I trust our comments will be taken into account and look forward to hearing from you in due course.
Regards

Stuart Natkus

Associate Planner

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From: elspeth fowler [mailto:efowler@selby.gov.uk]

Sent: 29 September 2011 13:44

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Subject: FW: Council's Statements

Importance: High

Good Afternoon

Please find attached three Statements from the Council.

The first two are in response to issues raised and for debate on Friday 30th.

The third is further information relating to Matter 7.

If you have any queries please let me know.

Regards

Elspeth Programme Officer.

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