



28 March 2022

Dear Sir/Madam

**Re: Escrick Neighbourhood Development Plan Submission (Reg 16) Consultation**

Thank you for the opportunity to comment on the Submission Draft Escrick Neighbourhood Development Plan submitted for independent examination in line with Regulation 15 of The Neighbourhood Planning (General) Regulations 2012 (as amended).

We recognise the level of dedication and work that has been undertaken by the Parish Council and Neighbourhood Plan Steering Group who have constructively engaged with the wider community in developing a comprehensive plan reflecting the community aspirations.

We previously provided comments dated 16<sup>th</sup> July 2021 to the Regulation 14 Pre-submission consultation undertaken by the Parish Council between 7<sup>th</sup> June 2021 and 18<sup>th</sup> July 2021, which are attached under Appendix A. It is noted that our previous comments at the pre-submission stage have been considered and integrated into the plan and a schedule of changes undertaken in response to our comments is set out in the Statement of Consultation dated January 2022. The table below sets out where we have further comments to make to those provided at the Pre-submission (Reg 14) consultation stage.

We welcome and support the development of Escrick Neighbourhood Development Plan and have provided continuous support and advice in a timely manner to ensure the continued development of the Plan.

In addition to the comments on the policies in the Neighbourhood Plan it is worth noting the current emerging Local Plan and the new settlement proposals which may impact Escrick Parish:

**Selby District Council Local Plan and New Settlement proposals**

The Council is currently preparing a new Local Plan which will help shape the long-term future of the District. A number of consultation stages have been undertaken with the 'Preferred Options' consultation stage being undertaken between January and March 2021 which sets out the Council's preferred approach to development growth in the District up to 2040.

*New Settlement Proposals*

In response to an earlier 'Call for Sites' exercise, three proposals have been submitted to the Council for consideration as potential locations for a new settlement, these are the former Burn Airfield, the former Church Fenton Airfield and a greenfield site to the east of the former Stillingfleet Mine (now referred to as Heronby). The latter of the three at Stillingfleet Mine is located across both Escrick and

Stillingfleet Parishes. All three of these sites are of a sufficient size to accommodate approximately 3,000 new dwellings and local infrastructure requirements such as new schools, health facilities, recreation areas and shops. The Council is not yet in a position to confirm which sites will be identified in a future 'Publication' version of the plan which will be consulted on during the summer of 2022.

Although it is too early to establish the preferred approach to a New Settlement it is recognised that development of a new settlement between Stillingfleet and Escrick could have significant impacts on Escrick as well as contributing towards achieving some of the objectives of the Escrick Neighbourhood Plan in areas such as managing sustainable development in the area, improving pedestrian and cycle links and providing highway improvements along the A19 to provide a bypass and reducing concerns around noise and traffic speed through the village.

Details of the emerging Local Plan are available on our website - <https://www.selby.gov.uk/localplan>.

If you would like to discuss these comments, please contact Ryan King

Yours faithfully

Planning Policy

## SDC Comments to Escrick Neighbourhood Development Plan Submission Consultation (Reg 16)

Escrick NDP Policy	SDC Response
1.7 - Objectives	Objective 2 – It is recommended that the wording of the first bullet point in Objective 2 replaces the word “ <i>small</i> ” with “ <i>appropriate</i> ”, so the wording reads: “ <i>To enable sustainable growth of the community through appropriate levels of new home construction in <b>appropriate</b> scale developments that meet the needs of existing and future residents</i> ”. The definition of small scale development is not established within the NDP and the amended wording would reflect the wording in Policy H1 (Allocated Housing Numbers) which requires development to be of an “ <i>appropriate</i> ” scale.
<b>Community &amp; Facilities</b>	
CF1 – Community Facilities	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
CF2 – Local Green Spaces	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
<b>Housing</b>	
H1 – Allocated Housing Numbers	Amended policy wording supported and reflects comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
H2 – Sustainable Design and Construction	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
H3 – Housing Mix	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
H4 – Homeworking	Note the amendment to the supporting text to clarify adequate internal space requirements for homeworking in response to the comments made at pre-submission consultation stage.
H5 – Siting, Scale & Density of Residential Development	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
H6 – Design	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
H7 – Infill, Backland & Replacement Dwellings	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
<b>Economic Development</b>	
ED1 – Small Business Development	Note that there is a typo in the last paragraph – ‘se’ should read ‘use’. No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
ED2 – Village Amenities	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
ED3 – Reuse of Redundant Buildings	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
ED4 – Agriculture	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).

<b>Escrick NDP Policy</b>	<b>SDC Response</b>
ED5 – Digital Connectivity	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
ED6 – Business Expansion	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
<b>Movement &amp; Transport</b>	
MT1 – Traffic Flow Along A19	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
MT2 – Car Parking	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
MT3 – Pedestrian & Cycle Connections	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
MT4 – Village Bus Infrastructure	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
<b>Natural Environment</b>	
NE1 – Green Infrastructure	<p>Policy considered to be in general conformity but would suggest that clarification of the types of development that would be required to “include space for community food growing such as allotments or orchards” should be defined. Although it is expected to relate to new housing development for example, ‘new development’ could also include minor development through householder applications (extensions, outbuildings etc) and clarification of what development would require community food growing facilities to be provided is recommended. It is assumed that it requires provision to be provided on a development site, however, dependent upon the type of development, as described above, this may not be achievable.</p> <p>In terms of the point relating to achieving “Biodiversity net gain of at least 10%”, it is suggested that this is expanded to include “in line with national policy” or through reference to the emerging Local Plan. The emerging Local Plan does have a policy under Preferred Approach NE5 – Biodiversity Net Gain for Ecological Networks in the Preferred Options Local Plan (<a href="https://www.selby.gov.uk/localplan">https://www.selby.gov.uk/localplan</a>) which sets out the approach to managing Biodiversity net gain. If the Neighbourhood Plan is suggesting a Biodiversity net gain process above and beyond the national guidance/local approach, then a suitable Green Infrastructure Study will be required, and appropriate monitoring would need to be in place.</p> <p>In terms of bullet point 4 which relates to the replacement of trees lost to development we would refer back to the comments made at Pre-submission stage. Whilst the approach to retaining and replanting trees in suitable locations is supported to increase tree coverage within the District, a ratio of at least 3:1 could be considered onerous and consideration of the loss and replacement of trees should be taken on a case by case basis considering what loss is occurring and how best to replace such loss through a suitable replacement planting scheme. Removal of a fixed ratio would align the policy better with the emerging Local Plan Policy NE6 (Trees, Woodland and Hedgerows).</p>

<b>Escrick NDP Policy</b>	<b>SDC Response</b>
	Also suggest that “to” is removed from the start of bullet point 1, 4 and 5 as it is duplicated on the first sentence “ <i>New development will be expected to</i> ”.
NE2 – Green Space Connectivity (formally NE3 - Rewilding)	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
NE3 – Accessing Nature (formally NE4 – Nature Walk)	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
<b>Built Environment &amp; Heritage</b>	
BEH1 – Drainage & Flood Prevention	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
BEH2 – Respecting Traditional Design	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
BEH3 – Historic Rural Environment	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
BEH4 – Streets & Street Scene	No further comments to make – see comments made at (Reg 14) Pre-submission consultation stage (Appendix A).
<b>Escrick Design Code</b>	
The updates the Design Codes set out in the Statement of Consultation are noted, taking account of the comments made at Pre-submission stage.	

## APPENDIX A –

### SDC Comments to Escrick Neighbourhood Development Plan Pre-submission Consultation (Reg 14)



16 July 2021

Dear Sir / Madam

#### **Re: Escrick Neighbourhood Development Plan Pre-submission (Reg.14) Draft**

Thank you for providing Selby District Council with the opportunity to comment on the pre-submission draft of the Escrick Neighbourhood Development Plan.

The Escrick Neighbourhood Plan Steering Group have done an excellent job over the last couple of years in collating the necessary evidence base, engaging with the local community and drafting the plan.

The comments below are provided to help the steering group to improve the plan prior to formal submission of the plan to Selby District Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended). Whilst you are under no obligation to take these comments on board, they are intended to ensure that there are as few modifications and policy deletions as possible at Examination and to strengthen the plan more generally.

#### Basic Conditions

At Examination, a Neighbourhood Plan will be judged on whether it complies with the Basic Conditions set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act (1990). These are as follows:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State
- b) The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development
- c) That making of the order (or neighbourhood plan) is in general conformity with the strategic policies in the development plan for the area of the authority
- d) The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.

The Examiner will make detailed recommendations in regard of the above basic conditions. However, specific policy comments are made in the table below, which provides general comments along with an assessment of whether each policy is in general conformity with national policy and Selby's development plan.

It is hoped that these comments are useful and will help the steering group to review the draft plan before it progresses to submission to Selby District Council. Please contact Ryan King to discuss these comments in more detail and to access any further support, if required.

Escrick NDP policy	Relevant NPPF / Core Strategy policies	SDC Response
<b>Community &amp; Facilities</b>		
Introduction / Aims & Objectives		The introduction clearly sets out the vision and objectives which are supported and align with SDC policies.
CF1 – Community Facilities	<p>NPPF paragraphs 92, 96 &amp; 97.</p> <p>Core Strategy policies:            SP12 (Access to Services, Community Facilities and Infrastructure)            SP14A (Town Centres and Local Services)</p>	<p>The policy seeks to protect a number of identified community facilities in line with paragraph 92 of the NPPF which recognises that in meeting the social, recreational and cultural services and facilities the community need planning policies should, in particular, <i>“guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to day needs”</i>.</p> <p>Following previous comments on your draft plan in relation to conflicts in wording between the approach to alternative provision it is noted that the wording in the last paragraph has been amended to match the wording in the first paragraph in that <i>“alternative provision must be provided to an equivalent or superior standard”</i>, rather than <i>“to a substantially enhanced standard”</i>.</p>
CF2 – Local Green Spaces	<p>NPPF paragraphs 99, 100 &amp; 101.</p> <p>Core Strategy policy:            SP12 (Access to Services, Community Facilities and Infrastructure)</p>	<p>Paragraph 100 of the NPPF requires that Local Green Space designations should only be used where the green space is in reasonably close proximity to the community it serves, is demonstrably special to a local community and holds a particular local significance, is local in character and is not an extensive tract of land.</p> <p>The Green Space Assessments under Appendix 1 are noted, having regard to the designation requirements set out under paragraph 100 of the NPPF.</p> <p>Status of identified Local Green Space sites within the adopted Development Plan:            A – Village Green – Existing Local Amenity Space allocation in Selby District Local Plan 2005 (SDLP).            B – Recreation ground and play area – Existing ROS allocation (eastern half) with western half deleted from ROS.            C – Gashouse plantation – New allocation – on area identified as a SINC</p>

Escrick NDP policy	Relevant NPPF / Core Strategy policies	SDC Response
		<p>D – Woodland buffer and QM Pond – New allocation – eastern part within SINC (pond) and Historic Park/Garden</p> <p>E – St Helens Church precinct &amp; associated Allotments – New allocation – western part (allotments) identified as ROS in SDLP.</p> <p>F – Dike – Existing Local Amenity Space – SDLP.</p> <p>SDC support the Local Green Space designations made in the draft plan.</p>
<b>Housing</b>		
Introduction	NPPF paragraph 60, 65, 66. CS Policy SP5	<p>Recognises the potential housing requirement of approximately 12 dwellings having reference to the growth options document to meet the housing need across the settlement hierarchy established in the Core Strategy – <a href="#">DSV Growth Options</a>.</p> <p>However, as the DSV Growth Options Report was drafted to support previous work undertaken on the Site Allocations Local Plan and is around 6 years old it may not be considered a robust approach taking account of changes in national policy. It therefore may be more appropriate to seek your own evidence of local housing need or refer to the broad approaches set out in the Core Strategy or the emerging Local Plan.</p> <p><u>Emerging Local plan</u></p> <p>The Council is now moving towards a new Local Plan with an aim of encouraging appropriate levels of development in appropriate locations. The Preferred Options Local Plan is available to view on our website - <a href="#">New Local Plan   Selby District Council</a></p> <p>Draft Policy SG2 (Spatial Approach) of the Preferred Options Local Plan sets out the spatial approach to development and identifies a settlement hierarchy with Escrick identified as a Tier 2 Village, with the allocation of land for new housing of an appropriate scale reflecting each settlement’s role. Policy HG1 (Meeting Local housing Needs) of the Preferred Options Local Plan sets out the approach to how housing will be distributed across the settlement hierarchy. In the case of Escrick it is enveloped by Green Belt and as such there is currently no proposal to allocate land for growth. However, sites with</p>



Escrick NDP policy	Relevant NPPF / Core Strategy policies	SDC Response
		<p>unimplemented planning permissions at the base date of the emerging plan (31 March 2020) will be allocated for the remainder of the plan period.</p> <p>Therefore, as set out in the table under paragraph 7.11 of the Preferred Options Local Plan, it is proposed to allocate one unimplemented planning permission for the remainder of the plan period in Escrick. The current approach is to not allocate any further land for development in Escrick in light of the Green Belt constraint, however, there may be opportunities for infill development outside of the Green Belt.</p>
H1 – Allocated Housing Numbers	NPPF paragraphs 59 – 66, 117 - 119	<p>The policy anticipates the future housing requirement for the area to be 0, however, the policy sets a limit of 18 dwellings (or an approximate 5% increase) up to 2035.</p> <p>While the supporting text references that the minimum housing requirement is 12, as set out in the Growth Options Report which considers options for the distribution of dwellings across the Designated Service Villages identified in the Core Strategy (and taking into account built and approved dwellings as at 31 March 2018), it is not considered to be a robust approach in light of the emerging, or future, approach to the distribution of housing.</p> <p>The limit of 18 dwellings (or an approximate 5% increase) appears to be an arbitrary limit with no justification or evidence base. To ensure a robust approach we would suggest the wording to this policy sets out that development for housing should be considered in line with the approach set out in local plan policies, rather than setting an unevidenced limit of 18 dwellings up to 2035.</p> <p>Subject to suitable amendments to the wording limiting the number of dwellings the policy would be considered in general conformity with policy.</p>
H2 – Sustainable	NPPF paragraphs 124, 125, 148 to 154. Core Strategy policies:	Focus of this policy is to ensure that sustainable building practices requiring the most up-to-date materials and technologies are utilised.

Escrick NDP policy	Relevant NPPF / Core Strategy policies	SDC Response
Design and Construction	SP1 (Presumption in Favour of Sustainable Development) SP15 (Sustainable Development and Climate Change) SP16 (Improving Resource Efficiency) SP17 (Low-Carbon and Renewable Energy) SP18 (Protecting and Enhancing the Environment) SP19 (Design Quality)	This policy is considered to be in general conformity with policy.
H3 – Housing Mix	NPPF paragraphs 59 to 61. Core Strategy policies: SP4 (Management of Residential Development in Settlements) SP8 (Housing Mix) SP9 (Affordable Housing)	The policy is considered to reflect the approach set out in national guidance and within the Local Plan, particularly in respect of the type, sizes and tenures of housing to meet an identified local need and is supported. The policy is considered to be in general conformity.
H4 – Homeworking	NPPF paragraphs 80 and 81.	<p>It is noted that additional supporting text has been included within the document clarifying that the trend of homeworking and the inclusion of such facilities into developments does not permit the use of a property for commercial purposes and any home working situation which could generate visitors, traffic, noise, fumes or would lead to other significant impacts upon the amenity of nearby residents or the wider area could require additional planning permission and the policy does not override normal planning requirements in terms of running a business from home.</p> <p>As such, SDC support the approach to planning for home working facilities and recognise that provision for homeworking provision should be provided, however, SDC consider each application should be considered on its own merits in line with relevant policies and the design code. The policy requires “adequate” internal space is provided to work from home and SDC would question how we would apply this policy when considering what is</p>

Escrick NDP policy	Relevant NPPF / Core Strategy policies	SDC Response
		<p>adequate and reasonable. If the policy is intended to repeat space standards in the Escrick Design Code is it necessary to repeat this in the policy wording?</p> <p>In light of this SDC consider the policy is considered to be in general conformity.</p>
H5 – Siting, Scale & Density of Residential Development	<p>NPPF paragraphs 61, 62, 65, 102 – 104, 122 and 123.</p> <p>Core Strategy policies:            SP2 (Spatial Development Strategy)            SP4 (Management of Residential Development in Settlements)            SP8 (Housing Mix)            SP18 (Protecting and Enhancing the Environment)            SP19 (Design Quality)</p>	<p>The policy is clear that development should reflect the needs identified in the wider development plan as well as requiring that development is sympathetic to the character and form of the existing settlement including the wider landscape. Please note the approach to residential development across the settlement hierarchy in the emerging Preferred Options Local Plan - <a href="#">New Local Plan   Selby District Council</a> as this will gain weight following publication (consultation due in early 2022).</p> <p>In addition, the policy identifies areas where improvements can be made in relation to the highway network and pedestrian/cycle connectivity within the village. There are some concerns about bullet point 3 as these details will be subject to comments from the Highways Authority.</p> <p>Overall, the policy is considered to be in general conformity.</p>
H6 – Design	<p>NPPF paragraphs 124 – 132.</p> <p>Core Strategy policies:            SP19 (Design Quality)</p>	<p>Policy requires proposals to accord with the principles and parameters of the associated Design Code. Comments on the associated Design Codes are set out at the bottom of this document.</p> <p>The approach set out in the Design Code is supported and is considered to be in general conformity.</p>
H7 – Infill, Backland & Replacement Dwellings	<p>NPPF paragraphs 117 – 119, 124 – 132.</p> <p>Core Strategy policies:            SP2 (Spatial Development Strategy)</p>	<p>The policy requires residential development to accord with the provisions of the Escrick Design Codes. Comments on the Design Codes are set out at the bottom of this document.</p>

Escrick NDP policy	Relevant NPPF / Core Strategy policies	SDC Response
	SP4 (Management of Residential Development in Settlements) SP19 (Design Quality)	
<b>Economic Development</b>		
Introduction		The introduction provides a good background to current economic activity in the parish and sets clear aims and objectives in supporting suitable facilities and economic growth.
ED1 – Small Business Development	NPPF paragraphs 80 – 84.  Core Strategy policies: SP13 (Scale and Distribution of Economic Growth)	The policy supports economic development in suitable areas which would not have an undue impact upon the amenity of area or local residents, with an emphasis on sustainable development.  The policy is considered to be in general conformity.
ED2 – Village Amenities	NPPF paragraphs 80 – 84.  Core Strategy policies: SP14 (Town Centres and Local Services)	The policy is supportive of development which would support/enhance existing provision in line with the NPPF and Core Strategy.  The policy is considered to be in general conformity.
ED3 – Reuse of Redundant Buildings	NPPF paragraphs 80 – 84.  Core Strategy policies: SP2 (Spatial Development Strategy) SP13 (Scale and Distribution of Economic Growth)	The policy is in line with Core Strategy policies SP2 and SP13 which both support the re-use of buildings for appropriate employment uses.  The policy is considered to be in general conformity.
ED4 – Agriculture	NPPF paragraphs 83 & 84.  Core Strategy policies: SP2 (Spatial Development Strategy)	The policy seeks to protect the best and most versatile agricultural land while supporting agricultural diversification. The policy accords with the provisions of Core Strategy policy SP13 and paragraph 83a of the NPPF.

Escrick NDP policy	Relevant NPPF / Core Strategy policies	SDC Response
	SP13 (Scale and Distribution of Economic Growth)	<p>Also note that following previous comments the supporting text recognises that farm diversification for certain uses can be undertaken under permitted development allowances under <a href="#">Class R (agricultural buildings to a flexible commercial use), Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended.</a></p> <p>The policy is considered to be in general conformity.</p>
ED5 – Digital Connectivity	<p>NPPF paragraphs 112.</p> <p>Core Strategy policies: SP12 (Access to Services, Community Facilities and Infrastructure)</p>	<p>The NPPF is clear that the communication infrastructure is essential for economic growth and social well-being and the expansion of the electronic communications network should be supported.</p> <p>The policy is considered to be in general conformity.</p>
ED6 – Business Expansion	<p>NPPF paragraphs 80 – 84.</p> <p>Core Strategy policies: SP2 (Spatial Development Strategy) SP13 (Scale and Distribution of Economic Growth)</p>	<p>The policy is in line with Core strategy policies SP2 and SP13 which both support sustainable economic employment growth in the rural economy.</p> <p>The policy is considered to be in general conformity.</p>
<b>Movement &amp; Transport</b>		
Introduction		Recognises the issues of the A19 running through the village with clear aims and objectives in managing highway issues in light of new development.
MT1 – Traffic Flow Along A19	NPPF paragraphs 102 – 104.	The policy requires new traffic safety measures to be implemented to support development which would lead to a ‘major increase’ in traffic. It is considered this would need to be raised with the Highways Authority for consideration against their existing guidance and for their consideration. It is unclear how a major increase would be defined?

Escrick NDP policy	Relevant NPPF / Core Strategy policies	SDC Response
MT2 – Car Parking	<p>NPPF paragraphs 105 – 106, 108 – 111.</p> <p>Core Strategy policies: SP15 (Sustainable Development and Climate Change)</p>	<p>The policy supports the implementation of NYCC parking standards and in line with the associated Design Codes. The policy looks to implement advances in travel technology such as electric vehicle charging points.</p> <p>The policy is considered to be in general conformity.</p>
MT3 – Pedestrian & Cycle Connections	<p>NPPF paragraphs 105 – 106, 108 – 111.</p> <p>Core Strategy policies: SP15 (Sustainable Development and Climate Change)</p>	<p>The NPPF sets out that planning policies should provide for high quality walking and cycling networks with Core Strategy policy SP15 also setting out that schemes should seek to improve sustainable travel options.</p> <p>The policy is considered to be in general conformity.</p>
MT4 – Village Bus Infrastructure	<p>NPPF paragraphs 105 – 106, 108 – 111.</p> <p>Core Strategy policies: SP15 (Sustainable Development and Climate Change)</p>	<p>The policy looks to upgrade existing public transport provision and is considered to accord with the provisions of the NPPF and development plan.</p> <p>The policy is considered to be on general conformity.</p>
<b>Natural Environment</b>		
Introduction		Identifies the current natural assets within the parish with clear aims and objectives.
NE1 – Green Infrastructure	<p>NPPF paragraphs 91, 170.</p> <p>Core Strategy policies: SP18 (Protecting and Enhancing the Environment)</p>	<p>Considered to be in general conformity, and note the inclusion of mapping identifying local GIS assets (please see note at the end in respect of OS mapping requirements).</p> <p>Tree planting – policy requires replacement tree planting to be sought at a 3:1 ratio where development is undertaken that leads to a loss. The policy requires on-site where possible but off-site within the plan area if not – it may be necessary to expand upon this to identify suitable species and whether they should be mature or saplings?</p>
NE3 – Rewilding	NPPF paragraphs 91, 170.	The policy supports the creation, enhancement and re-wilding of green spaces.

Escrick NDP policy	Relevant NPPF / Core Strategy policies	SDC Response
	Core Strategy policies: SP18 (Protecting and Enhancing the Environment)	Suggest this policy is renumbered to NE2.  The policy is considered to be in general conformity.
NE4 – Nature Walk	NPPF paragraphs 91, 170.  Core Strategy policies: SP18 (Protecting and Enhancing the Environment)	The policy supports the use and retention of existing and proposed rights of way.  Suggest this policy is renumbered to NE3.  The policy is considered to be in general conformity.
<b>Built Environment &amp; Heritage</b>		
Introduction		Recognises the history and heritage of the parish with a number of aims and objectives which are focused on making development sympathetic to the identified assets and character of the area while providing sustainable development.
BEH1 – Drainage & Flood Prevention	NPPF paragraphs 148 – 149, 155 - 165  Core Strategy policies: SP15 (Sustainable Development & Climate Change)	The policy accords with the approach set out in the NPPF which supports directing development away from areas of a higher probability of flooding, including a preference for sustainable drainage solutions.  Note that the supporting text makes reference to the approach to flood risk in the NPPF and the approach to the Sequential Test, along with reference to the Council’s Sequential test Guidance Note dated October 2019 - <a href="#">Submitting a Planning Application - Other Things to Consider   Selby District Council</a> .  It is also noted that the text references the Technical Guidance on the Council’s website in relation to sustainable drainage (SuDs).  The policy is considered to be in general conformity.

Escrick NDP policy	Relevant NPPF / Core Strategy policies	SDC Response
BEH2 – Respecting Traditional Design	<p>NPPF paragraphs 184 – 185.</p> <p>Core Strategy policies:            SP18 (Protecting and Enhancing the Environment)            SP19 (Design Quality)</p>	<p>The policy seeks to ensure good design is sought to reflect the design, layout and details of the character of the area and its recognised assets.</p> <p>The policy is considered to be in general conformity.</p>
BEH3 – Historic Rural Environment	<p>NPPF paragraphs 184 – 185.</p> <p>Core Strategy policies:            SP2 (Spatial Development Strategy)            SP18 (Protecting and Enhancing the Environment)            SP19 (Design Quality)</p>	<p>The policy is considered to be in general conformity.</p>
BEH4 – Streets & Street Scene	<p>NPPF paragraphs 91, 102.</p>	<p>The policy is considered to be in general conformity.</p>
<b>Other comments</b>		
OS Mapping	<p>The plan contains a number of OS based maps and to accord with Ordnance Survey licensing requirements on published mapping the following copyright text should be added to all mapping using SDC’s OS licence:</p> <p>Reproduced from the Ordnance Survey mapping with the permission of the controller of Her Majesty's Stationary Office.            ©Crown Copyright. Unauthorised reproduction infringes crown copyright and may lead to prosecution or civil proceedings. Selby District Council 100018656</p> <p>If there are any OS based mapping included in the document which is not subject to SDCs OS licensing I would suggest citing the relevant licence details/acknowledgements.</p>	



Escrick Design Code	
Page 4	<p>Recommend the removal of reference to <i>“of its time”</i>. Suggest the following sentence:  <b><i>“Development should be of its time, but should reference and complement its setting and context”</i></b> is replaced with:  <b><i>“Development should seek to improve or contribute to the character of place, by understanding, referencing, and complementing setting and context”</i></b>, or words to this effect.</p> <p>“Of its time” links directly back to a false interpretation of the Venice Charter (1964) into English from French, and which has become the go to for doing whatever an architect wants, rather than what the community desires. At the same time, including the word “understanding”, compels a developer to undertake a level of analysis. This shouldn’t close the door to contemporary design, but instead reframes the discussion from the outset, setting out an expectation for responsive solutions, rather than ones which are simply superimposed via standard house types, or by one-off statement buildings which contribute nothing to an ongoing story.</p>
Page 14 - Views	Recommend that the wording should say “...listed buildings or views to <u>and from</u> the surrounding countryside, should be identified and retained”.
Page 17	Although it is recommended that the disclaimer ‘*not representative of planned development’ is utilised on each illustration, it is considered it could be omitted from this page, as the indicative image represents a good layout. However, the captions pointing to the illustration do not actually relate to the features indicated. Recommend that that the text is retained but the pointers are removed.
Page 20 – Detailing	Recommend the word ‘pastiche’ is removed entirely and suggest the wording should say <i>“Attention to high quality architecture and well considered architectural detailing is expected.”</i> (Expected rather than encouraged).
Page 27 – Design Code G1.2 - Trees	Page 9 recognises the importance of planning for future generations within parkland, but shouldn’t succession tree planting also be a consideration throughout the rest of the village as well? And in particular, where a tree is lost, should an independently verified or accredited number for replacement trees be provided, with a ratio linked to a realistic replacement value (carbon capture / habitat provision / microclimate benefits / amenity / flood mitigation / etc).
Page 33 – Design Code F1.4	First illustration – a number of villages within Selby District feature blank side gables fronting main routes, an unusual but distinctive feature of the District, although unsure whether this is a feature within Escrick but possibly this image is not needed.
Page 38 – Design Code S1.4	<p>May be better to promote the ‘Goldilocks’ solution more as a rule of thumb, rather than anything more prescriptive as there are historic examples of both the rejected approaches, that in reality seem to muddle through in a way that contributes to local distinctiveness.</p> <p><i>“Where more than one house is proposed as infill, each property should aim to be individual in its approach to referencing the surroundings, avoiding repetition.”</i> – what if it’s a terrace infill? Although recognise this may not be such an issue for Escrick.</p>
Page 43 – Parking in the curtilage	Concerns that these photos are not the best example for Escrick. Is the document promoting on-street parking?

General comments	<p>Does the character of key gateways into the village need identifying in greater detail or protecting?</p> <p>It may be worth checking that the illustrations throughout the Design Codes do not contradict the approaches in the policies and design principles. Page 35 – Street Scale illustration – shows road frontage development with parking to the rear beyond the rear gardens. Suggest this illustration is amended to add the parking to the front as this is a design we would likely resist. Also note in the policies that front gardens are preferred under Design Code G1.1 and F1.6.</p>
------------------	--