

Selby District Council

2021 Strategic Housing Land Availability Assessment

September 2021



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1.0 Introduction

- 1.1 The Strategic Housing Land Availability Assessment (SHLAA) forms part of the evidence base for the Selby District Local Plan by providing a factual survey of potential housing development sites that will inform how allocated sites are chosen in the Local Plan. The survey of sites and the criteria used to assess them also informs the calculation of housing supply in the annual 5 Year Housing Land Supply reports (5YHLS).
- 1.2 It is important to note the distinction between the SHLAA and the 5YHLS reports which Selby District Council produce. The SHLAA, with the help of a working group, defines the criteria used to assess sites and then provides a factual survey of potential housing development sites. The 5YHLS report then uses this information to calculate the housing supply on an annual basis.
- 1.3 The SHLAA is a purely technical exercise intended to inform the Local Plan Document. 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 assessment questions (seen in tables 7 to 9) are factual and physical in nature and no scores for sites are given.
- 1.4 The assessment of sites for the Local Plan will be carried out with a site assessment methodology, which will consider local plan policy aspects, such as a site’s relation to the settlement hierarchy, its effect on local wildlife/landscape designations and its impact on the built heritage of the area.
- 1.5 The SHLAA **does not allocate land for development or determine whether a site will be allocated for housing**. The inclusion of sites within the SHLAA should not be taken to imply that the sites will be allocated for housing or looked upon favourably when determining planning applications. The decision to allocate will be made through the emerging Local Plan Document. The SHLAA will be updated and reviewed as part of the annual monitoring process.
- 1.6 This SHLAA has been produced in accordance with paragraphs 67 and 73 of the National Planning Policy Framework (NPPF) regarding housing supply. The NPPF requires local planning authorities to prepare a SHLAA in order to identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing requirement, and also identify a supply of developable sites or broad locations for growth, for years 6-10 and, where possible, 11-15 years.

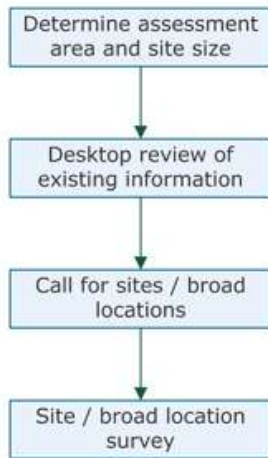
1.7 The report has also been produced in accordance with the National Planning Practice Guidance (NPPG) on housing and economic land availability assessments, along with other advice recently published by the Planning Advisory Service. The methodology flow chart in Figure 1 is taken from the NPPG and shows how the assessment of sites in this report will be carried out in 5 stages.

1.8 The core outputs of this SHLAA (as required by the NPPG) include:

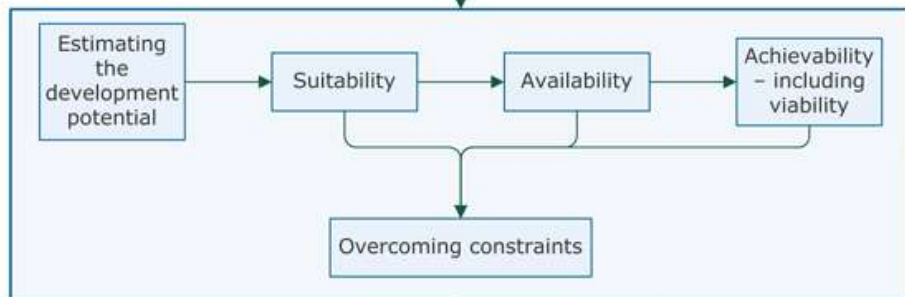
- A list of all sites or broad locations considered, cross-referenced to their locations on maps;
- An assessment of each site or broad location, in terms of its suitability for development, availability and achievability, including whether the site/broad location is viable, to determine whether a site is realistically expected to be developed and when;
- Contain more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;
- The potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
- An indicative trajectory of anticipated development and consideration of associated risks (which will also be produced annually in the Annual Monitoring Reports).

Figure 1: Methodology Flow Chart

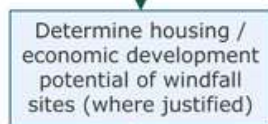
Stage 1- Site / broad location identification



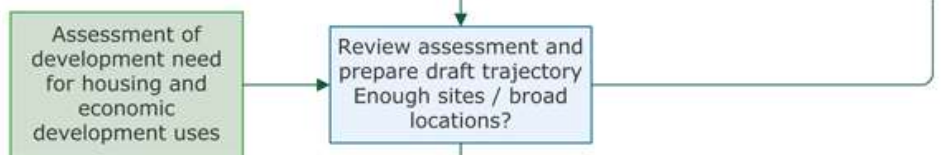
Stage 2 - Site / broad location assessment



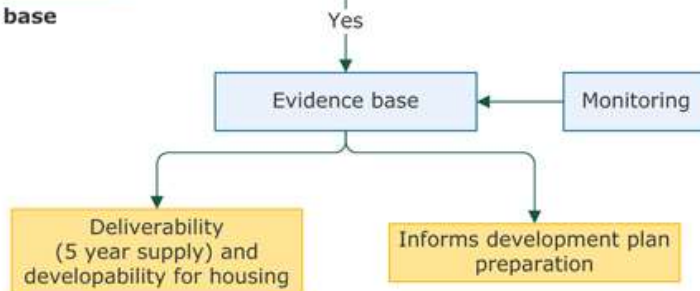
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



2.0 Stage 1: Identification of sites and stakeholder engagement

2.1 Scale of the assessment

The geographical area of the assessment is the Local Authority boundary, it is important that it is this exact area which is assessed as it will provide the necessary baseline data for the Site Allocations Local Plan document and the assessment of the authorities 5 year supply of housing land.

2.2 Types and sizes of sites included

All sites within the Selby Local Authority boundary are included in the basic assessment of sites provided they meet the minimum size threshold of 5 dwellings, as stated in the NPPG (Paragraph: 010Reference ID: 3-010-20140306). This is in order to provide a comprehensive audit of available land. The site types that were included in the assessment and which sources of sites are likely to come from are listed in table 1 below.

Table 1: Sources of sites

Type of site	Data source
Existing housing allocations yet to gain planning permission	Selby District Local Plan (2005) Selby District Core Strategy (2013)
Planning permissions for housing that are unimplemented or still under construction.	Planning application records. Development starts and completions records.
Sites put forward for housing development in the Local Plan.	Local Authority records database
Sites considered to be deliverable from the authority's previous Strategic Housing Land Assessments	Previous SHLAAs
Planning applications that have been refused or withdrawn	Planning application records
Land in the local authority's ownership	Local authority records
Surplus and likely to become surplus public sector land	National register of public sector land Engagement with strategic plans of other public sector bodies such as County Councils, Central Government, National Health Service, Police, Fire Services, utilities providers, statutory undertakers

Type of site	Data source
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes e.g. offices to residential)	Local authority empty property register English House Condition Survey National Land Use Database Commercial property databases (e.g. estate agents and property agents) Valuation Office database. Active engagement with sector
Additional opportunities in established uses (e.g. making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps Aerial photography Planning applications Site surveys
Sites in rural locations	Local and neighbourhood plans
Large scale redevelopment and redesign of existing residential or economic areas	Planning applications Ordnance Survey maps Aerial photography
Sites in and adjoining villages or rural settlements and rural exception sites	Site surveys
Potential urban extensions and new free standing settlements	

2.3 Sites from these sources were categorised into the following main types of sites in the assessment:

- **2005 Selby District Local Plan Allocations:** All the sites allocated for housing in the 2005 Selby Local Plan (which have since been saved by the Secretary of State and still make up part of the development plan), and have not yet been given permission.
- **Core Strategy Allocation:** In Policy SP7 of the 2013 Core Strategy, a strategic site was allocated at Olympia Park in Selby for mixed uses including 1,000 homes. A large part of the allocated site to the west has previously had permission for 863 dwellings which goes some way to proving the site is economically viable (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 2021.

- **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 2021. These sites are only given a basic assessment (detailed assessment questions are greyed out in the database) and are not included on the SHLAA maps.
- **Prior Approval not required:** 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 (detailed assessment questions are greyed out in the database) and are not included on the SHLAA maps.
- **Potential Site:** are sites which are not allocated and don't have permission and have been put forward by landowners and developers or have been identified by the Council, for consideration as housing sites in the Site Allocations Local Plan (provided they can accommodate 5 dwellings or more).

2.4 When drawing up the sites, a small number of those classed as Potential were combined to make larger sites. This was only done where sites needed combining to gain an access point or where they were too small to be assessed on their own, in order to make them deliverable. 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.

2.5 The call for sites

As part of the preparation for the new Local Plan document, a call for sites was carried out by the Council in November 2019 and ended in September 2020, a further call for sites was conducted during the Preferred Options consultation in January to March of 2021. During these events over 400 sites have been submitted to the council for housing development, encompassing many of the types of sites described in table 1. Sites can no longer be submitted to the Council for consideration in the emerging Local Plan.

2.6 Stakeholder engagement

National practice guidance advocates that local planning authorities work together with key stakeholders, in particular house builders and local property agents; so that they can help shape the approach to be taken to help inform the deliverability and developability of sites, and how market conditions may affect economic viability. In line with the guidance the Council has established a SHLAA Working Group.

- 2.7 The working group consists of two parts, a smaller core working group (made up of a balance of professionals from within the house building industry) who attend the methodology meeting, and the larger wider working group which consists of landowners and professionals from across the house building industry.
- 2.8 The Council has consulted with neighbouring authorities throughout the SHLAA process, in accordance with the duty to cooperate, in order to achieve a joined up approach to the issue of housing land supply. These authorities include Leeds City Council, City of York Council, Doncaster Metropolitan Borough Council, Harrogate Borough Council, Wakefield Council and the East Riding of Yorkshire Council.
- 2.9 The Council has also consulted with statutory consultees and infrastructure providers on a technical basis, in accordance with the duty to cooperate, such as the Highways Agency, Yorkshire Water and Natural England.
- 2.10 The working group for the 2021 SHLAA were sent the draft methodology on 30 April and then had two weeks to comment. Following this consultation, changes were made to the methodology to represent the views of the working group. A summary of the responses from the working group and the Councils response to them can be seen in Appendix A.
- 2.11 Once a final methodology had been produced, it was used to assess all the sites. After this had been done the draft site assessments were then sent back to the working group for comment on 11 June for two weeks. Their comments were then factored into the final assessment of sites.

3.0 Stage 2: Methodology and Site assessment

3.1 The engagement and consultation with the working group enabled a methodology to be finalised. In finalising the methodology, the Council has also had regard to guidance published by bodies such as the Planning Advisory Service (PAS), as well as considering the outcomes from appeals and high court judgements across the country.

3.2 Net capacity

In the case of sites with planning permission, account will be taken of the gross capacity of the site, minus any demolitions / mergers / changes of use associated with the permission that result in the loss of dwellings.

3.3 Calculating net developable areas

Not all of the area of a site can be developed solely for houses. In the case of large sites, using the gross site area can be misleading because space on larger housing sites will be required for ancillary uses. Using the 'net developable area' is a useful way of discounting for those parts of the site not developed for housing.

3.4 The net developable area includes 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 water storage;
- 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; and
- areas comprising non housing development, such as employment, commercial uses or community facilities (such as new school or health centre)

3.5 Table 2 shows the ratios for the developable area of sites, based on an assessment of different sizes of sites in Selby District. Larger sites tend to have more of their area used for non-housing uses and infrastructure and this is generally why the rates lower as the site size gets larger.

Table 2: Net Developable Area Ratios

Site Size Bracket (ha)	Net developable area ratios (%)
Up to 1	100
1 to 5	85
5 to 10	80
More than 10	70

3.6 Masterplans for proposed sites will be referred to and the SHLAA working group also had the option to submit their own assumptions for the developable areas of their sites.

3.7 Calculating density

The densities in the 2020 SHLAA are calculated on the net developable areas of sites. We have found that the only consistent correlation on sites in terms of density is when they are grouped by type of settlement. The exception to this is the greenfield/brownfield split in Selby, because very high densities are achieved on brownfield sites in the centre. Please note that sites with planning permissions already have their densities determined and will not be assessed.

3.8 An analysis of recent completions and permissions in the authority gave the density rates in table 3, however site promoters had the option to submit their own density rates and masterplans of potential sites were also reviewed by the Council.

Table 3: Densities

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

3.9 Calculating density for new Local Plan

In order to calculate the densities for the new Local Plan Settlement Hierarchy we have used an evidence based approach. The densities are calculated on the net developable areas of sites. We have found that the only consistent correlation on sites in terms of density is when they are grouped by type of settlement. The exception to this is the greenfield/brownfield split in Selby, because very high densities are achieved on brownfield sites in the centre. Please note that sites with

planning permissions already have their densities determined and will not be assessed.

- 3.10 An analysis of recent completions and permissions in the authority gave the density rates in table 4, however site promoters had the option to submit their own density rates and masterplans of potential sites were also reviewed by the Council.

Table 4: Densities

Settlement Hierarchy	Densities (dph)
Principal Town (Selby) - Brownfield (more than 50% PDL area)	50
Principal Town (Selby) - Greenfield (50% or less PDL area)	35
Local Service Centres	35
Tier 1 Villages	30
Tier 2 Villages	25
Smaller Villages/ Countryside	20

3.11 Pre-build lead-in times

A pre-build lead in time is the time taken for a site to complete its first unit. The approach to the length of pre build lead in times in the 2021 SHLAA factors in the size of the site, in terms of dwellings, as well as the planning status of the site and the time it takes to build the first house (the UK average is 6 months). 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.

- 3.12 The lead in times in table 5 are representative of the average times between the gaining of full, reserved matters, or outline permission and the completion of the first unit for different sizes of site. Full and reserved matters applications with a resolution to grant subject to a section 106 agreement are put into the outline bracket, because of the time taken to resolve these agreements.

- 3.13 The issues which may affect lead in times are more site specific, some larger sites may be part of a phased development and the lead in times are minimal, because the developer is effectively already 'on site'. Others may have complex section 106 agreements which may take a long time to resolve. Therefore there is an option for site promoters to submit their own estimates for pre build lead in times.

Table 5: Lead in Times

Gross Size of Site	Planning status of site		
	Reserved matters/full permission	Outline/resolved to grant permission	Without planning permission
1 - 10 dwellings	12 months	18 months	24 months
11 + dwellings	18 months	24 months	30 months

3.14 Build rates

Table 6 shows build rates, based on an assessment of different sizes of sites in Selby District and taking account of comments from the working group. Sites are grouped by size because larger sites have been shown to be built out at greater rates by major national housebuilders, who have the capacity to do so and smaller sites are generally built out by local builders, who build at a slower rate due to them having a lower capacity. As ever, site promoters had the option to submit their own build rates.

Table 6: 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, all potential sites are presumed to have 2 developers)

3.15 The Assessment Questions

Tables 7 to 9 show the questions which will be included in the assessment of sites in the 2021 SHLAA. These questions have been devised having regard to the most recent guidance in the planning practice guidance note for Housing and Economic Land Availability Assessments.

3.16 In line with the guidance, there will be a basic assessment of housing sites 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 8.

3.17 Once sites are assessed for their Suitability, Availability and Achievability in table 8 they will be given a deliverability timescale, if there are no constraints or constraints can be mitigated they are put into the 5 year supply. If there are constraints that take time to mitigate, sites will be put

back later in the plan period. If the constraints cannot be mitigated, the site will be put in abeyance.

Table 7: 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 ref	The unique reference for the site which cross-references to the references used in the 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"> • SLP Allocation • Large Planning Permission • Small Planning Permission • Approve Subject to S106 • Prior Approval Not Required • Potential Site
Allocations Reference/ Planning Permission Reference	Reference should the site be a saved allocation in the Selby Local Plan (2008) or an allocated site in the Core Strategy (2013). Should the site have planning permission, this is the most recent planning application reference.
Area (ha)	Gross area of the site measured in hectares (ha)
GF/BF	An indication as to whether the site is greenfield land, brownfield land, 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.
% PDL	% 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	<i>Sites of Special Scientific Interest (SSSI)</i> <i>Ramsar Sites, Special Protection Areas (SPA)</i> <i>Special Areas of Conservation (SAC)</i> <i>National Nature Reserves (NNR)</i> <i>Scheduled Monuments, Ancient Woodlands</i> <i>Health and Safety Executive Inner Zones</i> <i>Flood Risk areas - Zone 3b 'Functional Floodplain'</i> <i>Conservation Areas, Listed Buildings, Registered Battlefields and Registered Parks and Gardens</i>

Table 8: Suitability, Availability, Achievability, Deliverability

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 mapping produced by the Environment Agency.
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, 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 phase. Units will be projected from year 6 of the plan period. 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. 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.

Table 9: 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	The area of the site considered purely developable for housing (%) Sites with planning permission have already had their developable area approved through the development management process.
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.
PDL 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

4.0 Stage 3: Windfall assessment

- 4.0 Windfall sites will not be assessed in the SHLAA, the contribution from windfall sites towards meeting its 5 year housing land supply will be accounted for in the 5 year housing supply report (in line with paragraph 48 of the NPPF) and the details on the method of their projection is provided in 2021-26 5YHLS report.

5.0 Stage 4: Assessment review

- 5.0 The final 2021 SHLAA has 641 sites within it. Table 10 below shows the composition of these sites based on their type and the housing capacity remaining.

Table 10 Count and capacity of site types in the 2021 SHLAA

Row Labels	Count of Site type	Sum of Deliverable Capacity Remaining
Large Planning Permission	26	1861
Small Planning Permission	203	483
SDLP Allocation	6	936
Core Strategy Allocation	1	3,201
Potential Site	404	44,336
Total	640	50,817

- 5.1 Table 11 shows at which point in the plan period these dwellings could be built, the time period for delivery is based on the build rates and lead in times described in the methodology, but where a site has been found to have significant constraints in the detailed assessment, it has had its start date for building moved to years 6-10 or 11-15 of the plan period.
- 5.2 There were 28 sites in the assessment which had to be moved to years 6-10 due to significant constraints found at the detailed assessment stage, such as there being no access to a site. There are 3 sites in the year 11+ category, as this is when the landowners foresee that site coming forward. There were also 2 sites which were assessed to be undeliverable, due to major constraints found at the detailed assessment stage which cannot be mitigated over the course of the plan period.

Table 11: Expected Delivery of Site Types in the 2021 SHLAA

Row Labels	Sum of years 1-5	Sum of years 6-10	Sum of years 11-15
Large Planning Permission	1,549	311	0
Small Planning Permission	438	0	0
SDLP Allocation	205	443	107
Core Strategy Allocation	0	350	350
Potential Site	19,975	11,245	3,373
Total	22,167	12,349	3,830

5.3 Table 12 shows the geographical spread of deliverable existing and potential housing supply, in terms of the Core Strategy's settlement hierarchy. The amount that can be delivered over the plan period is far in excess of what is needed in Core Strategy Policy SP5. As the amount of growth needed by the authority in all areas of the district can be met on specific identified and deliverable sites, there is no need to designate Broad Locations for housing growth in this SHLAA.

Table 12: Delivery of Sites across the Core Strategy Settlement Hierarchy

SP2 Settlement Type	Total years 1-5	Total years 6-10	Total year 11-15	Grand Total	Selby District Local Plan Core Strategy SP5 Requirement*
Principal Town	2255	2324	880	5459	2,636
Local Service Centres – Sherburn In Elmet	1357	1073	386	2816	0
Local Service Centres - Tadcaster	480	493	0	973	470
Designated Service Village	11537	5803	1437	18777	0
Secondary Village	4020	1504	777	6301	0**
Countryside	2518	1152	350	4020	0**
Total	22167	12349	3830	38346	3,106

*SP5 requirement minus completions from April 1st, 2011 to March 31st, 2021

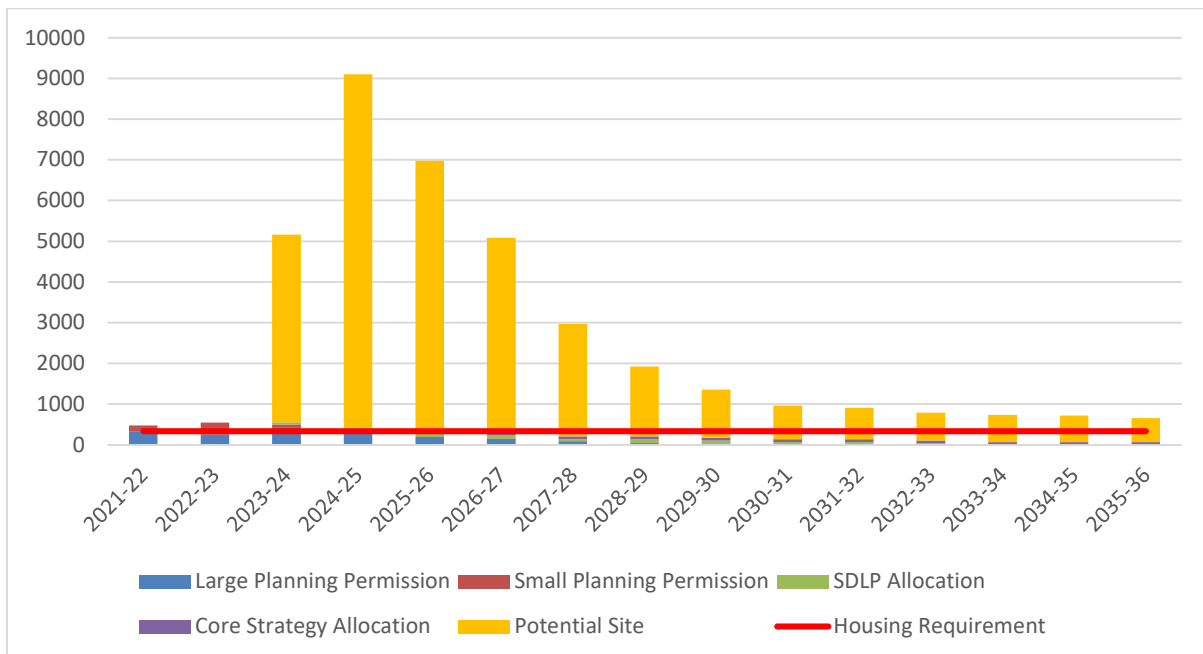
**No dwellings were required for these levels of the hierarchy in Policy SP5

6.0 Stage 5: Final evidence base

6.1 Trajectory

NPPG states that an indicative housing trajectory should be produced as a core output of the assessment. Figure 2 shows the trajectory of all deliverable sites in the 2021 SHLAA, the vast majority of the supply comes from potential sites, and as shown in table 12, far exceeds the housing needs required in the Core Strategy. The potential build-out rate of all sites reaches a peak in 2024-25, but would continue to produce a substantial amount of units for the next 15 years.

Figure 2: Trajectory of deliverable dwellings in the SHLAA – all sites



6.2 Conclusions

- The 2021 SHLAA has assessed 640 sites for housing use, with a total capacity of 50,817 dwellings.
- The vast majority of those sites have been found to be deliverable, 28 sites were moved back in years 6-10 of the plan period due to significant restraints and 3 are in the years 11-15.
- 2 sites had major constraints and have been held in abeyance.
- Large sites with planning permission have been assessed in detail in this SHLAA; most have been found to be deliverable in the first 5 years.
- The number of specific deliverable sites identified means there is no need for broad locations of growth to be identified.

- The findings of this assessment inform the calculations in the 5 year housing land supply report.
- The assessment data from this report will also be used to inform the New Local Plan.

6.3 Reviewing the assessment

The Council will continue to monitor all residential planning permissions as of the 31st of March each year to gather data on completions and what remains to be built within the District. Each site with planning permission is surveyed and the figures are then used to assess the planning status of the sites within the SHLAA database and to inform the Council's 5 year supply.

- 6.4 Whilst sites in the database will be reviewed annually as part of the 5 Year Supply (and landowners contacted to check for intentions), these will be added to the SHLAA database on a rolling basis. Updating the SHLAA more widely (i.e. contacting land owners and a call for sites exercise) will be undertaken at regular intervals in order to maintain a robust evidence base.

Appendices

Appendix A: Comments received on the SHLAA methodology

Appendix B: Samples used for determining the SHLAA methodology

Appendix C: SHLAA site assessment database

Appendix D: Parish maps

Appendix E: Site assessment summaries

Appendices C, D and E can be seen at:

<http://www.selby.gov.uk/strategic-housing-land-availability-assessment-shlaa>

Appendix A: SHLAA Working Group Agenda Paper

1. The 2021 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 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 the Council'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 2021.
- **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 2021. 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 2021.

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.

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)
- In order to achieve the target of biodiversity net gain, once adopted through the Environmental Bill, we will propose an approach to account for biodiversity net gain to reduce the net developable area dependent on a number of factors including but not limited to location, greenfield/ brownfield, site size etc.¹

Table 1b shows the Council's 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 A² 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 2019 - 2021	
Site Size Bracket (ha)	Net developable area ratios (%)
Up to 1	99
1 to 5	86
5 to 10	81
More than 10	72

Table 1b – Proposed Developable areas	
Site Size Bracket (ha)	Net developable area ratios (%)³
Up to 1	100
1 to 5	85
5 to 10	80
More than 10	70

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

¹ This will not apply to permitted sites as this will have been dealt with by the LPA at the application stage.

² 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.

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 - 2021			
Row Labels	Greenfield	Brownfield	Average
Principal Town - Selby	38	49	45
Local Service Centre - Sherburn	31	47	36
Local Service Centre - Tadcaster	59 ⁴	43	53 ⁵
Designated Service Village	26	34	29
Secondary Village	20	24	23
Countryside	27	29	28
Grand Total	25	32	28

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)	35
Local Service Centres	35
Designated Service Villages	30
Secondary Village	20
Countryside	20

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.

⁴ This is a high density as there have been limited housing completions on greenfield land in Tadcaster

⁵ This average density is high given the low number of completions in Tadcaster on both greenfield and brownfield sites.

Table 3a - Average of Months between decision and first plot completed 2015 - 2021			
Application Type	1 to 10 Dwellings	11+ Dwellings	Average
REM/FUL	13	15	14
OUT	19	24	22
Grand Total	13	16	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

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 Council 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 - 2021	
Gross capacity of site (dwellings)	Annual Build rate
1-10	5
11-25	10
26-50	18
51-100	31
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, all potential sites are presumed to have 2 developers)

8. The assessment questions

Below are the proposed questions which will be included in the assessment of sites in the 2021 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	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). Should the site have planning permission, this is the most recent planning application reference.
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>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>Conservation Areas, Listed Buildings, Registered Battlefields and Registered Parks and Gardens</i></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, neighbouring uses, proximity of waste water treatment works, topography, mineral designations, drainage (surface water and foul sewage), ground conditions, hazardous risks, pollution or contamination, impact on playing fields, impacts Local Wildlife Sites or Sites of Importance for Nature Conservation.
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 phase. Units will be projected from year 6 of the plan period.

	<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

9. Next Steps

- Sites within the SHLAA will 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 Councils housing land supply from the period 2021-22.

Appendix B: Comments received on the SHLAA Methodology

Table 8: Responses from the working group to the methodology		
Respondent	Summary of Comments	Selby DC Response
Ellen Milner (Yorkshire Wildlife Trust)	<p><u>Developable Areas</u> Developable area ratios should take into account the need to incorporate biodiversity net gain on site. In accordance with NPPF para 175d, proposals should demonstrate a ‘measurable’ net gain in biodiversity. The emerging Environment Bill which is expected to put a requirement for all proposals to achieve a 10% net gain in biodiversity; whilst not yet formally released, this level is already being implemented as good practice across the country. All options to include the net gain requirement on-site should be explored before looking into off-site compensation options.</p> <p><u>Basic Assessment Questions</u> A specific question regarding proximity to Local Wildlife Sites or Sites of Importance for Nature Conservation would be welcomed. This may affect the density of housing if a buffer zone or mitigation areas are required.</p>	<p>We have added Local Wildlife Sites and Sites of Importance for Nature Conservation to the list of “Physical Constraints”.</p> <p>In order to achieve target for biodiversity net gain, once adopted, we will propose an approach to account for biodiversity net gain to reduce the net developable area dependent on a number of factors including but not limited to location, greenfield/ brownfield, site size etc.</p>
Mark Johnson (Johnson Mowat)	I’m comfortable with these assumptions.	No response required.
Anna Gallie (Historic England)	Thank you for consulting Historic England on the above document. The document has been looked at by one of our Historic Environment Planning Advisers and at this stage we have no comments to make on its content.	No response required.
Charlotte Gill York Consortium (Drainage Boards)	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.	We have added surface water and foul sewage to the list of “Physical Constraints”.
Melanie Lindsley (Coal Authority)	Although the Coal Authority has no specific comments to make on the Methodology Document and the questions asked therein, we are pleased to note that in Table 6 (Suitability, Availability, Achievability) the site assessment criteria include consideration of ground conditions.	No response required.
Richard Fordham (Sports England)	<p>Sport England would make the following comments in relation to Table 5: Basic Assessment Questions and Table 6 – Suitability, Availability, Achievability.</p> <p>Sport England’s statutory role in the planning system:</p>	We have added impact on playing fields to the list of “Physical Constraints”.

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	<p>Paragraph 97 of the NPPF offers clear advice on how sport facilities should be considered in the planning system. It states:</p> <p><i>“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</i></p> <p><i>a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</i></p> <p><i>b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</i></p> <p><i>c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”</i></p> <p>Sport England is a statutory consultee on planning applications affecting playing field land. The requirement to consult Sport England covers all playing field land regardless of ownership and all playing pitches regardless of their surface (i.e. natural and artificial grass pitches). Sport England isn't just a statutory consultee on planning application which lead to the loss of playing field but we are also a consultee on planning applications which prejudice the use of playing field. An example of prejudicial impact on playing field could include a residential scheme on non playing field land proposed next to a cricket ground that could lead the occupiers of the new houses being at risk of ball strike. Another example could be a residential scheme proposed next to a sports ground where the noise being generated by the sporting use of the sports ground could create a noise nuisance to the occupiers of the new dwellings. Where there is the risk of ball strike or noise, this can constitute a nuisance under the Environmental Health legislation and this could lead to the sporting use of a playing field being stopped.</p> <p>We assess planning consultations against the five exceptions in our Playing Fields Policy. These exceptions are:</p> <ul style="list-style-type: none"> • E1 A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport. 	

Table 8: Responses from the working group to the methodology

Respondent	Summary of Comments	Selby DC Response
	<ul style="list-style-type: none"> • E2 The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use. • E3 The proposed development affects only land incapable of forming, or forming part of, a playing pitch and does not result in the loss of or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other sporting/ancillary facilities on the site. • E4 The playing field or playing fields that would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of development. • E5 The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.' <p>Sport England exceptions above, reflect paragraph 97 of the NPPF.</p> <p>Ensuring site designations are sound:</p> <p>Sport England wishes to avoid a potential situation whereby the SHLAA leads to Local Plan designations which create planning applications that we later have to object to because they are not in accordance with our Playing Fields Policy or paragraph 97 of the NPPF.</p> <p>A site designation does not alter its lawful planning use. It is any subsequent planning application that alters the use. Furthermore, an allocation does not alter Sport England's status as either as a statutory or non-statutory consultee and Sport England's playing fields policy would still be considered along with paragraph 97 of the NPPF.</p> <p>We would direct the LPA to the attached appeal in respect of an area of open space that contained a football pitch and grassed open space which has a site allocation (industrial), where the Inspector noted that the open space had not been</p>	

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	<p>demonstrated as surplus and that the appeal site would be in conflict with paragraph 97 of the NPPF. The appeal states (paragraph 14):</p> <p><i>“Thus, notwithstanding its allocation as a SICA under CS Policy CSTP6, the proposed development would be in conflict with CS Policy PMD5 and paragraph 97 of the Framework, which is a material consideration to which I afford substantial weight, the specific requirements of which are specified above.”</i></p> <p>Therefore, in considering any sites in the SHLAA that contain sport facilities, they should either be clearly evidenced as being surplus in the Council’s evidence base or a replacement site needs to be identified and the two sites linked and made specifically clear that planning permission needs to be secured for the replacement site and it should be constructed and made available for use before the existing site is lost in accordance with policy exception E4 above.</p> <p>For clarity, both Sport England’s Playing Fields Policy and paragraph 97 of the NPPF are not enabling development policies. Providing qualitative improvements on a playing field/sport sites as mitigation for the loss of a sports site does not meet the policy requirements. Our policy resists the loss of playing fields where the only benefit being the investment and intensification of existing playing fields sites. This is to prevent a loss in quantity of playing fields overall, which if perpetuated countrywide would mean it would be impossible to resist a decline in all playing field sites save a few very high quality pitches.</p> <p>In respect of schemes that could prejudice the use of playing field (as set out in the examples above), the assessment should consider whether any proposed mitigation to prevent ball strike or noise would be acceptable to the LPA. For example, Sport England is aware from experience elsewhere that the ball stop netting/fencing can be up to 25 metres in height and this has caused concern for the Local Planning Authority. For this reason, Sport England considers that the matter of the design and height of any required mitigation should be considered in order for it to be acceptable to the planning authority.</p> <p>By taking the above into account, this ensures that any proposed site is consistent with paragraph 97 of the NPPF and also (in the case of prejudicial impacts on playing field) consistent with paragraph 182 of the NPPF states:</p>	

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	<p><i>“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”</i></p> <p>Sport England’s suggested amendments to the SHLAA methodology:</p> <p>In considering sites that contain playing field and sport facilities, the salient exceptions to assess would be exception E1 or E4.</p> <p>Sport England is aware that Selby Council have produced an up to date evidence base consisting of:</p> <ul style="list-style-type: none"> • Playing Pitch Strategy (carried out in accordance with a methodology approved by Sport England) • Built Sports Facilities strategy. <p>In respect of schemes that could prejudice the use of playing field (as set out in the examples above), the assessment should consider whether any proposed mitigation to prevent ball strike or noise would be acceptable to the LPA.</p> <p>By including the above considerations into the SHLAA document, this will ensure that any sites are consistent with national planning policy and will avoid the potential of an objection from Sport England as a statutory consultee. Therefore making the site deliverable from a sporting consideration.</p>	
Rob Moore (Savills)	<p>Is the definition of developable area appropriate?</p> <p>The Selby definition of Developable Area appears wider in scope than that traditionally used by the development industry. For example it cites the inclusion of internal roads, incidental open space, landscaping and play areas.</p>	In line with current guidance and recently published SHLAAs, it is deemed acceptable to define net developable area in the way we have. We will continue to update the SHLAA with the

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	<p>The definition generally used by the industry when discussing with developers is that Net Developable means land developed for residential dwellings and (without limitation) including roads where there is frontage from residential dwellings on either side (and where there is frontage from residential dwellings on one side of the road only, half of such road shall be included and half excluded); private garden space; and on plot car parking areas,</p> <p>All other areas such as roads with no frontage development, landscaping, play areas, areas for drainage should be excluded.</p> <p>The approach is set to be confirmed through forthcoming guidance by the RICS having consulted on Measurement of Land for Development and Planning Purposes (1st edition) in 2019. We understand the final publication is due imminently as will provide a definitive position on the matter.</p>	<p>most up to date information as it is adopted or published.</p>
	<p>What are your thoughts on the proposed developable area ratios?</p> <p>The above definition will undoubtedly impact on the % calculations, however taking the industry standard definition the developable area ratios quoted appear too high with smaller sites of up to 1 Ha in experience achieving 70% net to gross but medium sites typically achieving 60% net to gross at most.</p> <p>This is evidenced through my client's site which involves a 5 Ha site, 2.83 Ha of which is developable following a detailed masterplanning and technical exercise leading to a ratio of 56%. Please note there are no site abnormalities which would skew the area and we would describe this as a typical development site.</p> <p>We also note that there are a number of sites with 60% net to gross in the council's own evidence. The evidence provided only relates to 18 sites which is not a comprehensive pool and suggest evidence is drawn from neighbouring council's with a greater pool of greenfield development.</p> <p>The 60% suggested would not apply to all greenfield developments, however, with new settlement projects typically achieving between 40-50% net to gross (see Langwith, York District and Bassetlaw, Bassetlaw District). Therefore it would be prudent to include an additional category of schemes over 50 Ha equivalent to c.1,000 units+ in size with a ratio of 40%.</p>	<p>In line with the most up to date evidence and our definition of net developable area we deem our approach acceptable. At the next stage of the SHLAA process we will be asking for comments on individual sites build rates from developers, owners and agents of sites.</p>
	<p>Are the Brackets of site sizes appropriate?</p>	<p>We have considered the following however, in line with the evidence and</p>

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	<p>The category of 1-5 Ha and 5-10 Ha is considered immaterial and instead should be merged to more closely reflect the split between Small, Medium and Large builders.</p> <p>Taking account of the evidence our proposed revisions to the table are as follows:</p> <table border="1"> <thead> <tr> <th colspan="2">Table 1b – Proposed Developable areas</th> </tr> <tr> <th>Site Size Bracket (ha)</th> <th>Net developable area ratios (%)</th> </tr> </thead> <tbody> <tr> <td>Up to 1</td> <td>70</td> </tr> <tr> <td>10 to 50</td> <td>60</td> </tr> <tr> <td>More than 50</td> <td>40</td> </tr> </tbody> </table>	Table 1b – Proposed Developable areas		Site Size Bracket (ha)	Net developable area ratios (%)	Up to 1	70	10 to 50	60	More than 50	40	<p>master planning provided for the new settlements, at this stage we deem our approach to be acceptable. At the next stage of the SHLAA process we will be asking for comments on individual sites build rates from developers, owners and agents of sites to inform our final SHLAA document.</p>
Table 1b – Proposed Developable areas												
Site Size Bracket (ha)	Net developable area ratios (%)											
Up to 1	70											
10 to 50	60											
More than 50	40											
	<p>6. What are your thoughts on the density rates proposed for sites without permission?</p> <p>We would start by commenting that it is correct to discount the data for Tadcaster, there is no reliable comparable information for greenfield sites and the brownfield sites only relate to very limited completions.</p> <p>Taking evidence from my client's site this involves 100 units on a greenfield site at the edge of Tadcaster equating to a development density of 35 dwellings per developable hectare. We note this includes a significant proportion of policy compliant affordable units at higher densities so would consider this to be at the higher end of what is typical for a greenfield site.</p>	<p>Thank you for your comments at the next stage of the SHLAA process we will be asking for comments on individual sites build rates from developers, owners and agents of sites.</p>										
	<p>7. Are there particular locations which require higher density levels – for example urban brownfield sites?</p> <p>It is unlikely that Selby will meet a significant development need through high density urban brownfield growth. The build costs associated with developing at height set a high bar in terms of capital values to ensure the development is viable. With Selby Town, the average home values are broadly half the UK average (see table 1):</p>	<p>No response required.</p>										

Table 8: Responses from the working group to the methodology

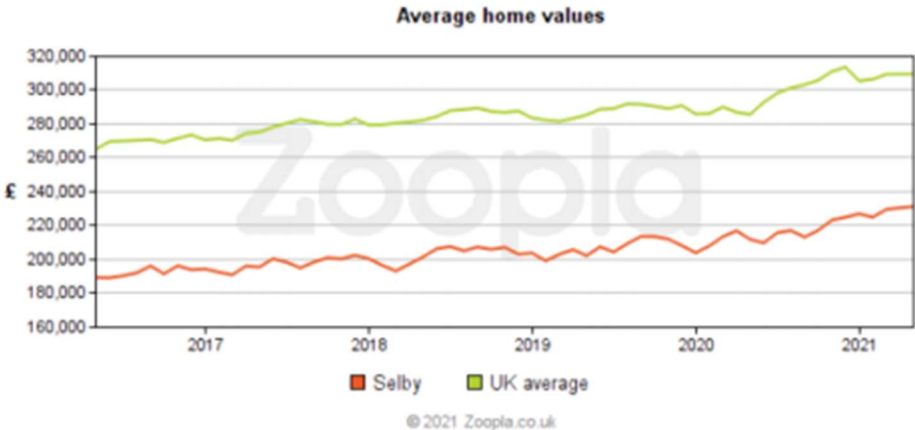
Respondent	Summary of Comments	Selby DC Response
	 <p>Table 1 – Extract from Zoopla housing price data May 2021 It would therefore be incorrect to assume higher densities beyond 50dpha for urban brownfield locations in the interest of effective planning.</p>	
	<p>8. What are your thoughts on the parameters for the lead in times and on the presumptions we have made?</p> <p>Our only point to make is on sites without planning permission. They should not be included for five year housing land supply purposes as the NPPF makes clear through its definition of deliverable sites (see Glossary). To suggest the lead in time would be 24 months would lead to ineffective planning and in our experience often larger and/or more complex sites these can take 5-10 years from inception to build.</p> <p>It would be prudent to assume any sites without planning permission would not come forward in at least the next 5 year period from any given date (i.e. 60 months minimum). This comment also applies to the Selby definition of deliverability at page 9/10 which should be altered to reflect paragraph 67 of the NPPF and accompanying glossary definitions.</p>	<p>In line with recently published SHLAAs, sites without planning permission have been proposed to come forward from 18 months to 48 months. (Doncaster – 24 months, East Riding - 36 Months, Harrogate - 30 to 48 months, Hull – 18 months, Leeds 36 Months).</p> <p>We have considered the following however, in line with the evidence we deem our approach to be acceptable. At the next stage of the SHLAA process we will be asking for comments on individual sites Lead in times from developers, owners and agents of sites to inform our final SHLAA document.</p>
	<p>9. Are the sizes of sites appropriate?</p>	

Table 8: Responses from the working group to the methodology		
Respondent	Summary of Comments	Selby DC Response
	<p>The 11-25, 26-50 categories should be merged to better align with Medium/ Regional builders and aid in analysis and comparison of performance of these sub-sectors in the future. Ultimately it would also help plan for the different needs and encourage better diversity in accordance with the Letwin Review.</p> <p>More evidence of this can be found within our enclosed research publication (see p.8/9 Savills 2018 'what next for housebuilding?').</p> <p>Our suggestions for the revised table are set out below in answer to question 11.</p>	<p>There is a difference in the evidence for 11-25 than 26-50 so it is deemed acceptable that we take this approach. Having re evaluated based on location there is a similar completions rate between the evidence supplied to the working group, once taken into account anomalies which skew the figures.</p>
	<p>10. Are the build rates appropriate?</p> <p>The build rates are broadly in line with experience for Small and Medium developers, albeit suggest that the categories should be simplified to better align with the three types of housebuilder (see above).</p> <p>A large housebuilder builder upwards would typically develop and release a maximum of 3 dwellings per month or c.35 dwellings per annum (assuming optimum market conditions) partly due to supply chain availability and also due to the ability to sell within any given market whilst avoiding market saturation.</p> <p>Our suggested build out rates for these categories are set out at question 11.</p>	
	<p>11. Should location be factored into the assessment?</p> <p>The largest impact on sales rates are locational factors, therefore this should be included within any assessment. This can be seen in Selby's own evidence over the past ten years with more urban/ accessible locations completing at higher rates than less accessible areas – for example in Selby and surrounding villages with an average of 46 dpa on 100+ unit sites vs. comparatively less accessible locations with an average of 29 dpa. A remedy would be to follow the settlement hierarchy – set out below.</p> <p>The second point to make is there are market saturation thresholds and it is unlikely that a single housing market area could sustain over 120 dwellings per annum in the long term with a maximum of four housebuilders before negatively impacting the product sale price and production to slow. This is well established and a critical limiting factor in planning for larger allocations (e.g. new settlements) or multiple allocations within a single housing market area. Our suggestion for the revised table is as follows:</p>	

Table 8: Responses from the working group to the methodology

Respondent	Summary of Comments	Selby DC Response																								
	<table border="1" data-bbox="533 295 1317 746"> <thead> <tr> <th colspan="3" data-bbox="533 295 1317 323">Table 4b - Proposed Build Rates</th> </tr> <tr> <th data-bbox="533 323 768 384">Gross capacity of site (dwellings)</th> <th colspan="2" data-bbox="768 323 1317 384">Annual Build rate</th> </tr> <tr> <td data-bbox="533 384 768 416"></td> <th data-bbox="768 384 1010 416">Primary Location*</th> <th data-bbox="1010 384 1317 416">Secondary Location**</th> </tr> </thead> <tbody> <tr> <td data-bbox="533 416 768 448">1-10 (Small)</td> <td data-bbox="768 416 1010 448">5</td> <td data-bbox="1010 416 1317 448">5</td> </tr> <tr> <td data-bbox="533 448 768 480">11-50 (Medium)</td> <td data-bbox="768 448 1010 480">15</td> <td data-bbox="1010 448 1317 480">10</td> </tr> <tr> <td data-bbox="533 480 768 512">51-100 (Large)</td> <td data-bbox="768 480 1010 512">35</td> <td data-bbox="1010 480 1317 512">30</td> </tr> <tr> <td data-bbox="533 512 768 655">201+ (Large)</td> <td data-bbox="768 512 1010 655">70 (70 if 2 developers, all potential sites are presumed to have 2 developers)</td> <td data-bbox="1010 512 1317 655">(60 if 2 developers, all potential sites are presumed to have 2 developers)</td> </tr> <tr> <td data-bbox="533 655 768 746">Note</td> <td colspan="2" data-bbox="768 655 1317 746">Cumulative build out rates up to a maximum of 120 dpa in any one given Housing Market Area.</td> </tr> </tbody> </table> <p data-bbox="533 758 1489 815">*Where primary location refers to Principal Towns and Local Service Centers and associated adjacent land</p> <p data-bbox="533 815 1220 847">** Where secondary location refers to all other settlements.</p>	Table 4b - Proposed Build Rates			Gross capacity of site (dwellings)	Annual Build rate			Primary Location*	Secondary Location**	1-10 (Small)	5	5	11-50 (Medium)	15	10	51-100 (Large)	35	30	201+ (Large)	70 (70 if 2 developers, all potential sites are presumed to have 2 developers)	(60 if 2 developers, all potential sites are presumed to have 2 developers)	Note	Cumulative build out rates up to a maximum of 120 dpa in any one given Housing Market Area.		
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	<p data-bbox="533 847 660 879">Summary</p> <p data-bbox="533 879 1512 943">Our recommendations are set out above and the relevant evidence either stated or enclosed.</p> <p data-bbox="533 970 1512 1066">We look forward to receiving confirmation of receipt of this submission. Should you wish to discuss anything further or require additional information please do not hesitate to contact either myself or Sophie Williams at this Office.</p>	No response required.																								
<p data-bbox="224 1177 481 1268">Adrian Moore (Classic Development Ltd)</p>	<p data-bbox="533 1066 1512 1193">We would like the "assessment" to include sites that have gone through the "whole" process in order to satisfy Outline Planning Approval conditions and understand how these schemes can be introduced to the development numbers, should those forecasted numbers not be being met.</p> <p data-bbox="533 1220 1444 1284">Our scheme at Garden Lane, Sherburn-in-Elmet has cleared all aspects of the Outline process in terms of satisfying:-</p> <p data-bbox="533 1311 705 1372">Ecological Environmental</p>	<p data-bbox="1556 1066 2004 1193">At the next stage of the SHLAA we are asking for individual comments on the sites build rates, lead in times and deliverability.</p>																								

Table 8: Responses from the working group to the methodology		
Respondent	Summary of Comments	Selby DC Response
	<p>Impact on local Wildlife assessment e.g Bats/Badgers Flood risk / drainage Highways and a schedule of upgrade works to undertake to improve site access/egress etc.</p> <p>We would appreciate your comments relating to how sites such as ours could be brought forward to help maintain the declared housing numbers by Selby District Council.</p>	
Aisling Kelly (Lichfields)	Client would like to be added to working group	No response required.
Chris Binns (Barton Willmore)	<p>1. Does the working group agree with these types of sites as a viable source to populate the 2021 SHLAA? We would agree that the source of sites set out within consultation document is reasonable and appropriate as a basis for formulating the sites which are considered within the SHLAA. Whilst not implied within the question or the consultation document, we would note that 'Potential Sites' i.e. those without planning permission, should not be included within the Council's 5 Year Housing Land Supply (5YHLS).</p>	Potential sites are not included in the 5YHLS, a separate report is done for this evidence base.
	<p>2. Is the definition of developable area appropriate? We would agree that the definition of developable area is appropriate, and the proposed exclusions are correct.</p>	No response required.
	<p>3. What are your thoughts on the proposed developable area ratios? 4. Are the brackets of the site sizes appropriate? We have considered the answer to these questions jointly as they are inter-linked. We would suggest breaking down the site size brackets further so that they are in 2.5ha increments rather than 5ha increments. At present, a site which is 4.9ha in area and a site which is 9.9ha only have a 5% difference in net developable area and this is not a realistic representation when one site is 50% larger than the other. As such, we would suggest the following breakdown:</p> <ul style="list-style-type: none"> • Up to 1 • 1 to 2.5 	The developable area ratios are based on the evidence supplied. At the next stage of the SHLAA process we will be asking for comments on individual sites developable areas from developers, owners and agents of sites.

Table 8: Responses from the working group to the methodology		
Respondent	Summary of Comments	Selby DC Response
	<ul style="list-style-type: none"> • 2.5 to 5 • 5 to 7.5 • 7.5 to 10 • <p>More than 10 Using the above example with our suggested brackets would mean that a 5% difference between a site which is 4.9ha and one which is 7.4ha would be more realistic and reasonable.</p>	
	5. Should site be grouped by other factors? We would agree that the approach to grouping sites by where they site within the settlement hierarchy is reasonable and appropriate.	No response required.
	6. What are your thoughts on the density rates proposed for sites without permission? Whilst we agree with the concept of differentiating between brownfield and greenfield sites within the Principal Town of Selby, we would suggest that the reference to either 'more than 50% PDL area' or '50% or less PDL area' is open to dispute and is too prescriptive. We would suggest changing the definitions to 'predominantly brownfield' and 'predominately greenfield'. There may be scenarios where the split between greenfield and brownfield is closely balanced, and we don't feel that the SHLAA should be bogged down in percentage calculations.	The densities are based on the evidence supplied. At the next stage of the SHLAA process we will be asking for comments on individual site densities from developers, owners and agents of sites.
	7. Are there particular locations which require higher density levels – for example urban brownfield sites? In the most part we agree with the proposed density levels shown by the Council, however, we disagree with the density of 35 dwellings per hectare for Local Service Centres as sites in these locations are considered most likely to be greenfield and therefore a more reasonable density would be 30 dwellings per hectare.	The densities are based on the evidence supplied. At the next stage of the SHLAA process we will be asking for comments on individual site densities from developers, owners and agents of sites.
	8. What are your thoughts on the parameters for the lead in times and on the presumptions we have made? We consider the approach to lead-in times is flawed and needs further work. The Council are only proposing to have two site size thresholds – 1 to 10 dwellings and 11+ dwellings. This means that a site which has a capacity of 250+ will be attributed the same lead-in times as a site with a capacity of 11 units. Realistically this is never going to be the case and from experience, there is generally a direct correlation between lead-in	The lead in times are based on the evidence supplied. At the next stage of the SHLAA process we will be asking for comments on individual site lead in times from developers, owners and agents of sites.

Table 8: Responses from the working group to the methodology

Respondent	Summary of Comments	Selby DC Response
	<p>times and site capacity i.e. the greater the capacity, the greater the lead-in times. Therefore, the Council need to be far more realistic in terms of lead-in times. In our experience, even sites of less than 100 units can take nearly 36 months from inception through to the completion of the first dwelling on site. Sites in excess of 100 units up to 500 can take, at a conservative estimate, 48 months from inception to the completion of the first unit. Sites in excess of 500 units can take anything from 72 months to 96 months given the huge complexity and competing issues.</p> <p>There are various milestones along the way, including the preparation of a planning application, including undertaking pre-application discussions, public consultation, preparation of technical reports, obtaining sign off from all interested parties; validation, determination, planning committee, negotiation of a section 106 legal agreement, potentially marketing of a site and seeking a developer, obtaining detailed consent, discharging relevant conditions and constructing infrastructure. We are currently involved with a proposed new community in Leeds, which in time will deliver 1,800 new homes. We were instructed to prepare an outline planning application for the first phase of the development totalling 1,000 units in July 2015, with the application being approved in November 2017. At the time of writing, detailed consent is not yet in place and no dwellings have been constructed. This hopefully provides the Council with first-hand experience of the timescales involved in such sites. In summary, we would advise that there needs to be several further site thresholds with more realistic lead-in times. For example, these could be 11-99 units; 100-499 units and 500+.</p>	
	<p>9. Are the sizes of sites appropriate? We would agree that the size of sites is appropriate and acceptable.</p>	<p>No response required.</p>
	<p>10. Are the build rates appropriate? In general, the proposed build out rates seem reasonable. We would however suggest that where two developers are on a site of 201+ units, a build out rates of 60 or 65 units would be more appropriate from experience.</p>	<p>The build rates are based on the evidence supplied. At the next stage of the SHLAA process we will be asking for comments on individual site build rates from developers, owners and agents of sites.</p>

Table 8: Responses from the working group to the methodology		
Respondent	Summary of Comments	Selby DC Response
	11. Should location be factored into the assessment? No, we believe this would add a layer of complexity with limited benefits and we would not suggest that this idea is taken forward.	No response required.
Merlin Ash (Natural England)	<p>Strategic Housing Land Availability Assessment (SHLAA) for Selby District Council</p> <p>Thank you for your consultation dated 30 April 2021. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. 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. 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 Avoiding harm to the character of nationally protected landscapes - National Parks, the Broads and Areas of Outstanding Natural Beauty - and locally valued landscapes. 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. 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 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. More detailed</p>	No response required.

Table 8: Responses from the working group to the methodology		
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	<p>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). 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. 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. 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. Avoiding harm to priority habitats, ecological networks and priority and/or legally protected species populations 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. 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</p>	

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	<p>are possible habitats for protected species. 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. 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. 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. 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. 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. 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 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. Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland,</p>	

Table 8: Responses from the working group to the methodology

Respondent	Summary of Comments	Selby DC Response
	<p>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. The SHLAA should consider the availability of GI and opportunities to enhance GI networks when considering sites for development. 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). 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. 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. Seeking opportunities to contribute to landscape restoration and enhancement. 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. 4. Best and Most Versatile Agricultural Land Avoiding Best and Most Versatile Agricultural Land 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. 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. Accessible natural greenspace should be provided as an integral part of development. Housing should make provision for appropriate quantity and quality</p>	

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	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. 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.	
Rachael Martin (ID Planning)	1. Does the working group agree with these types of sites as a viable source to populate the 2021 SHLAA We agree with the proposed consideration of allocations, planning permission, prior approvals, potentials sites and applications approved subject to S106.	No response required.
	2. Is the definition of developable area appropriate? We agree with the proposed definition which excludes a number of areas such as major distributor road, significant landscape buffers, open spaces serving the wider area, and areas required for significant water storage in high flood risk areas. We consider that a definition of ‘significant’ landscape buffer strips and storage areas and the open space serving a wide area should be included in the methodology.	
	3. What are your thoughts on the proposed developable area ratios? The proposed ratio for sites up to 1ha should be reduced to 99% to reflect the average developable areas.	The build rates are based on the evidence supplied. At the next stage of the SHLAA process we will be asking for comments on individual site build rates from developers, owners and agents of sites.
	4. Are the brackets of site sizes appropriate? Yes we support the proposed area brackets.	No response required.
	5. Should sites be grouped by other factors? The proposed site densities should be grouped according to the settlement hierarchy definitions in Preferred Option Policy SG2.	At this stage as the plan has not yet gone to examination it is proposed it still follows the Core Strategy Local Plan (2013) hierarchy.
	6. What are your thoughts on the density rates proposed for sites without permission?	The site densities are based on the evidence supplied. At the next stage of the SHLAA process we will be asking for comments on individual site densities

Table 8: Responses from the working group to the methodology

Respondent	Summary of Comments	Selby DC Response																					
	<p>The proposed densities of 30dph for Designated Service Villages (Tier 1), and 20dph for Secondary Villages (Tier 2) and the Countryside should be increased to rates shown in the table below to reflect the average densities and to provide sustainable housing and boost housing supply to meet needs in accordance with national and local policies.</p> <table border="1" data-bbox="533 443 1370 707"> <thead> <tr> <th data-bbox="533 443 813 496">Settlement Hierarchy</th> <th data-bbox="813 443 1055 496">Proposed Density (dph)</th> <th data-bbox="1055 443 1370 496">IDP Proposed Density (dph)</th> </tr> </thead> <tbody> <tr> <td data-bbox="533 496 813 549">Principal Town (Selby) Brownfield</td> <td data-bbox="813 496 1055 549">50</td> <td data-bbox="1055 496 1370 549">50</td> </tr> <tr> <td data-bbox="533 549 813 601">Principal Town (Selby) Greenfield</td> <td data-bbox="813 549 1055 601">35</td> <td data-bbox="1055 549 1370 601">35</td> </tr> <tr> <td data-bbox="533 601 813 627">Local Service Centres</td> <td data-bbox="813 601 1055 627">35</td> <td data-bbox="1055 601 1370 627">35</td> </tr> <tr> <td data-bbox="533 627 813 652">Service Villages (Tier 1)</td> <td data-bbox="813 627 1055 652">30</td> <td data-bbox="1055 627 1370 652">30-35</td> </tr> <tr> <td data-bbox="533 652 813 678">Secondary Village (Tier 2)</td> <td data-bbox="813 652 1055 678">20</td> <td data-bbox="1055 652 1370 678">25-30</td> </tr> <tr> <td data-bbox="533 678 813 707">Countryside</td> <td data-bbox="813 678 1055 707">20</td> <td data-bbox="1055 678 1370 707">25</td> </tr> </tbody> </table>	Settlement Hierarchy	Proposed Density (dph)	IDP Proposed Density (dph)	Principal Town (Selby) Brownfield	50	50	Principal Town (Selby) Greenfield	35	35	Local Service Centres	35	35	Service Villages (Tier 1)	30	30-35	Secondary Village (Tier 2)	20	25-30	Countryside	20	25	<p>from developers, owners and agents of sites. Also at this stage as the plan has not yet gone to examination it is proposed it still follows the Core Strategy Local Plan (2013) hierarchy.</p>
Settlement Hierarchy	Proposed Density (dph)	IDP Proposed Density (dph)																					
Principal Town (Selby) Brownfield	50	50																					
Principal Town (Selby) Greenfield	35	35																					
Local Service Centres	35	35																					
Service Villages (Tier 1)	30	30-35																					
Secondary Village (Tier 2)	20	25-30																					
Countryside	20	25																					
	<p>7. Are there particular locations which require high density levels- for example urban brownfield sites? We consider the proposed densities are appropriate for the SHLAA assessment.</p>	<p>No response required.</p>																					
	<p>8. What are your thoughts on the parameters for the lead in times and on the presumptions made? The proposed lead in times are considered to be appropriate to inform the SHLAA assessment and subject to adjustments resulting from site promoters providing site by site estimates for lead in times.</p>	<p>At the next stage of the SHLAA process we will be asking for comments on individual site lead in times from developers, owners and agents of sites.</p>																					
	<p>9. Are the sizes of site appropriate? 10. Are the build rates appropriate? It is considered the size of sites and proposed buildings rates are acceptable subject to adjustment based on site promoters estimates.</p>	<p>At the next stage of the SHLAA process we will be asking for comments on individual site build rates from developers, owners and agents of sites.</p>																					
	<p>11. Should location be factored into the assessment? We consider the inclusion of location is unnecessary in the assessment assuming the build rates are subject to adjustments from site promoters that may take this into consideration.</p>	<p>No response required.</p>																					
	<p>12. Are the questions appropriate for the assessment? 13. Area there any questions which are unnecessary? 14. Are there any other questions we could include? The proposed questions are considered to be appropriate. Our only comment relates to the percentage of Greenfield and Previously developed land. Table 5 (basic assessment question) states that this will calculate the number of</p>	<p>No response required.</p>																					

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	homes that could be built on each area in Table 7 (estimating the development potential). The estimate of potential development for each section of land in Table 7 will have to have regard to the net developable area (table 7) as this may exclude greenfield land so that the percentages identified are not accurate. I trust the above is satisfactory but please do not hesitate to contact me should you need any further information.	