

Planning Policy Team
Selby District Council
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SENT BY EMAIL
localplan@selby.gov.uk
27/11/2017

Dear Sir / Madam,

**PLAN SELBY SITE ALLOCATIONS LOCAL PLAN: POOL OF SITES
CONSULTATION (Reg 18)**

Thank you for consulting with the Home Builders Federation on the Selby Site Allocations Local Plan: Pool of Sites Consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

Plan Period

The Core Strategy plan period is 2011 to 2027, with this site allocations document using the same period. It is noted that the 2027 plan period will not ensure a 15 year time horizon as preferred by the NPPF, paragraph 157. Indeed by the time of adoption it will not even provide a ten year period, this is not considered an appropriate time scale. Whilst it is recognised this may have implications for the evidence base and site allocations, the HBF recommends that the Council considers taking the opportunity provided within this document to extend the end date of the Plan.

Duty to Cooperate

The Selby Local Plan states that the Council 'will continue to involve neighbouring planning authorities such as Leeds, York, East Riding, Doncaster and Wakefield'. However, the Council has not produced a Duty to Cooperate Statement as part of the evidence base for this document and the latest document identified appears to be a draft statement from 2014.

In complying with the duty the Council must have regard to the plans of neighbouring authorities. This is particularly important considering the state of flux in plan preparation currently being experienced within York, Harrogate and Doncaster. The Plan Selby document provides the opportunity for the Council to consider whether it can or should assist any of its neighbouring authorities in meeting any of their unmet needs.

It is therefore essential that the Council continues to work collaboratively with neighbouring authorities on all strategic matters irrespective of whether they are dealt with in the Core Strategy. In this regard the Council's commitment to on-going dialogue is supported. Whilst the duty is not a duty to agree it is important that this dialogue consists of more than consultation and meetings. It is the efficacy of the engagement throughout the plan making process and the outcomes which flow from such engagement which will determine whether the duty has been met.

How much development and where?

The Core Strategy, adopted in 2013, identifies that between 2011 and 2027 at least 7,200 homes are required, which is equivalent to 450 per year. Whilst the Pool of Sites document states that more recent evidence provided within the Draft SHMA (2015) identifies an objectively assessed need for 466 dwellings each year.

Question 1: Should the plan provide a 'contingency element' by over allocating land beyond the minimum housing targets of the Core Strategy? If so, how much and where should this contingency amount be and why?

The plan identifies a minimum housing requirement of 450dpa, the plan should therefore seek to exceed this requirement, particularly in light of the reference to the SHMA establishing a higher need for 466 dwellings.

The HBF is firmly of the opinion that additional site allocations over and above the minimum housing target should be made. The scale of such over-allocation should be based upon a number of factors not least the track record of delivery against previous requirements and the potential for the sites allocated to be delivered. Given the recent history of under-delivery (shown in table 1 below) within Selby the HBF concludes that as a minimum a 20% buffer should be included within the allocations.

To increase delivery across the whole of the plan area the HBF recommends a wide range of sites are provided, both in terms of size and location. This will ensure that the sites appeal to a wide cross section of the development industry and housing market avoiding saturation effects. In this regard the HBF recommends that the buffer comprises of both enlarged sites as well as additional smaller sites.

The HBF also support the provision of contingency sites which could be released in the event of non-delivery from other sites. It is recommended that an appropriate trigger would be based upon the annual review of the five year supply, as required by the NPPF (paragraph 47), anticipating whether a shortfall could occur, rather than waiting for a shortfall to arise over a three year period.

It is also noted within the Core Strategy, in the text to support SP5 that reference is made to the provision that windfall development will make to the overall housing

supply. Paragraph 5.42 makes reference to the additional flexibility to significantly boost housing supply that these windfall sites will make. It is considered that the Council will need to monitor the provision that windfall development is making to the delivery of homes in the Borough to ensure that this supply remains and is continuing to provide additional flexibility and the opportunity to boost housing supply.

Table 1: Under Delivery (figures taken from 5-year housing land supply report 2017-2022 Position at 30 th September 2017)			
Year	Net Completions	Core Strategy	Over/Under Supply
2011/12	281	450	-169
2012/13	178	450	-272
2013/14	289	450	-161
2014/15	435	450	-15
2015/16	496	450	46
2016/17	561	450	111
	2,240	2,700	-460

Question 2: How should we cater for self-build and custom build in the Site Allocations Local Plan?

In principle the HBF is supportive of self-build & custom build for its potential contribution to overall housing supply. The HBF would recommend appropriate evidence is collated to ensure that house building delivery from this source provides an additional contribution to boosting housing supply. This is likely to include engaging with landowners and working with custom build developers to maximise opportunities.

Question 13 Do you agree with this approach to amending Development Limits? Why?

The Council propose to only alter Development Limits to accommodate development needs in those locations where allocations are proposed to be made, including existing planning permissions and to reflect existing built development.

The HBF recognises the need to maintain the character of settlements and the role that the ‘development limits’ boundaries can play. However, the HBF considers that it is important that the Council reviews the development limits to ensure that they are drawn to allow for the potential growth of settlements to meet local needs as well as to ensure that the overall housing requirement is being met. It is recommended that the Council considers the benefit of long term certainty for the local community and the development industry when looking at any boundaries. This could include potentially providing opportunities for development beyond the lifetime of the current plan, or as potential contingency sites if development does not occur as expected elsewhere.

Green Belt / Safeguarded Land

The HBF supports the provision of safeguarded land. Paragraph 85 of the NPPF is clear that safeguarded land can be utilised; *‘in order to meet longer-term development needs stretching well beyond the plan period’*. Neither the NPPF nor NPPG define *‘well beyond the plan period’* but it is clear that the government do not

wish to see regular reviews of the Green Belt (NPPF paragraph 83). In this regard the HBF recommends that sufficient safeguarded land is provided to ensure that further amendments to the Green Belt are not anticipated at plan review and therefore a minimum of 15 years of development land beyond the plan period would appear appropriate.

The Council will be aware that safeguarded land can only be released upon plan review. To provide flexibility within the plan the Council may wish to consider allocating some of this land as contingency land which could be released if allocations are not performing as anticipated.

Future Engagement

I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'J. Harding'.

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