

## **Escrick Parish Council Representations to Selby District Plan Issues and Options Consultation: 24 January – 6 March 2020**

Escrick Parish Council welcomes this further Local Plan now being prepared. The previous Plan Selby remains a good strategy on which to base forward planning in the short-term; this new Plan promises a major review of all Issues and Options to seek to secure the right planning and investment in the right places for the longer term foreseeable future until 2040. It will incorporate up to date national and local issues of concern – such as climate change and sustainability, to be balanced against providing good quality and well designed housing and economic prosperity – and recognises the important role that Neighbourhood Plans play in providing good planning guidance at the local level, with involvement of the local community.

We note that the Escrick Neighbourhood Development Plan (NDP) currently in preparation is recognised in para 2.22 as one of the designated NP areas within Selby District. We intend to continue working with Selby Planning Policy to ensure that it remains in general conformity with the current adopted Local Plan and will continue to do so as work on both documents move forward. Whilst the replacement Selby Local Plan documents will provide the Strategic Framework for the District as a whole and the various NDP areas within it, in accordance with Government advice, it is intended that the Escrick NDP will provide the detailed policies and guidance as to where and how development can take place in Escrick Parish and will thus assist the determination of planning applications in due course as part of the statutory framework post adoption.

We support the Council's work and duty to cooperate with other surrounding Planning Authorities and organisations. The northern edge of Escrick village and some of our services lie within the City of York Council's area of jurisdiction, and so shared values and visions are important to us. We also support and welcome the work currently being undertaken with Northern Powerhouse, Transport for the North, the LEPs and other organisations cited; these can provide valuable workstreams as well as investment and funding opportunities that will benefit Selby District as well as the wider Region. Likewise the Selby District Economic Framework and the priorities cited in para 2.45 must logically be important influences in the preparation of this Plan. We believe that it is important that investment and the economy must be linked to investment in new housing to assist in meeting climate change objectives (see paras 3.12-3.14), and we will comment on this further below.

Paras 3.21 and 3.22 set out the planning permissions that have been granted for major employment centres and where potential for further large scale economic growth should be achieved. This is supported in principle. Para 3.19 cites the high level of commuting to work outside the District. It is noted that many of these sites relate well to both the A1 and M62 corridors and to the existing railway network. It is imperative that travel to work distances should be reduced where feasible and that greater use of the rail network should be encouraged. And so more facilities (including car parking – to encourage park and ride by rail) may need to be provided at these key rail stations. We note the work being proposed under the Transforming Cities Fund to enhance and open up the area around Selby Station to provide improved access to the town centre and key redevelopment sites. Together with other work to improve Selby town centre, prioritisation of schemes and areas such as these for new development – in preference to greenfield sites in more rural settlements – will direct investment into these areas, provide quality homes and services in sustainable locations, and help to assist in meeting climate change objectives in reducing the need to travel for people and goods.

We note that further studies are to be made of road capacity and use of the main road network. We would advise that the overriding concern of Escrick residents that has been cited in the NDP work to date has been the increasing usage of the A19 so that it is now perceived to be at capacity; there are lengthy queues along the A19 during peak periods (often back to Riccall) including weekends to the A64/A19 junction and difficulty in safely accessing onto it from the village. Likewise the increasing

use of the A19 by HGVs creates a poor living environment for those houses fronting and near to the A19 (pollutants, noise etc), and walking along the adjoining footpaths to services within the village, including across the main road, becomes increasingly dangerous and unpleasant for residents. Policies and initiatives that would reduce traffic onto this road and access onto it from existing settlements along it would be welcomed.

#### ***Question 1 Levels of Economic Growth***

We support Option 1 that Selby should provide for the levels of growth forecasted in the emerging Housing and Economic Development Needs Assessment. This reflects its role as a rural area within North Yorkshire, rather than an urban conurbation, but one with a strong economy. However, as cited, if opportunities arise that will bring obvious benefit to the District and may, for example, make positive use of a brownfield site or allow an existing business to grow, then flexibility should be shown to allow for these investment opportunities in appropriate locations.

#### ***Question 2 Supporting a diverse local economy and thriving Town Centres***

We support the key issues and opportunities outlined in Theme 1. In doing so, as outlined in our introductory comments, it makes sense for employment and housing opportunities to be closely aligned. In particular, if Selby District provides appropriate opportunities and sites for the M62 Energy Corridor to encourage the growth of low and zero carbon businesses, this will assist the achieving of wider climate change objectives for all land uses and lifestyles generally. However, as current circumstances dictate, proposed development sites need to be located away from Flood Risk and flood basin areas, and allow for climate change within their design, to ensure that these developments remain fit for purpose in the longer term.

Likewise, we support the diversification of the district's rural economy without damaging the special qualities of the natural environment. We believe that there will be appropriate opportunities for small scale reuse and diversification of rural sites / buildings for both small scale business and housing. These will need to be carefully designed but can provide a positive contribution to the rural economy and lifestyles of people living there. Where any impact on sensitive areas cannot be avoided, then policies are needed to ensure that commensurate levels of mitigation / enhancement are securely procured to compensate for any loss (using S106 as required).

#### ***Question 3 Providing the right infrastructure to support local communities***

Linked to this must be the need for high quality broadband and other necessary infrastructure. Investment in all areas is needed to provide quality services so that rural areas are not discriminated against. For example, there is no gas supply to Escrick. And broadband and mobile receptions are both poor. Also, despite being on a major link road from Selby to York, the Arriva bus service is expensive and poor compared to urban areas, with infrequent services after peak hours (and taxis are cost prohibitive for those working shifts or late at night, or for leisure use).

Likewise, we support investment to improve walking and cycling in and around settlements. As already cited, it is difficult and increasingly unsafe for Escrick residents to cross the A19 to access local services, including public transport, doctor's surgery, church, leisure facilities etc. We support investment in local infrastructure to support local communities such as ours and others similarly affected by a main road bisecting the village.

#### ***Question 4 Creating High Quality Places to Live***

We strongly support the need for policies to ensure that why new development creates high quality places for people to live.....and work. Good design is at the centre of good living standards, and the polices must be there to enable development control officers to reject proposals that are obviously of

poor design and would provide a substandard living environment both to those who would live in the house and its neighbours. As a Parish Council, we regularly respond to planning applications and, where proposals are poor, make positive suggestions as to how improvements can be made. Our NDP work to date has received strong representations from the community of the importance of good design and the need to retain the rural nature of the village - ie 'town cramming' is not acceptable, whether from new build infill properties or from large poorly designed overdeveloped extension proposals.

We believe some planning legislation (eg some permitted development rights) can cause difficulties for development control work, which can be assisted by clear policy statements. Policies set out in the new Local Plan would assist it in rejecting poor proposals and help secure reasonable living standards. We support that new housing should have good space standards – internally and externally – and we advocate that policies should be introduced based on the Government's 'Technical housing standards: nationally described space standards' to ensure that satisfactory living accommodation is provided. Similarly, the adoption of residential amenity design guidance (as many other local planning authorities have done, through SPGs as well as into Local Plans to ensure that they are accorded sufficient weight) would assist in ensuring satisfactory amenity space, privacy, natural daylight and outlook is designed into proposals for new housing and house extensions at the outset and preserved in the longer term.

We also support that a range and mix of housing should be provided, to meet the needs of all. Encouraging mixed communities provides for local needs and wellbeing, helping to ensure that communities remain sustainable and inclusive and that local facilities – such as schools, shops, leisure facilities, religious and community facilities remain viable and available. Incorporating green public open spaces and green frontages (and reasonable gardens) into design assists climate change objectives (sustainable drainage and space for tree planting), walking and cycling, health and mental well being and should be included in development proposals and then protected thereafter. The adoption of design guidance for development control purposes at an early date will secure improvements to the District's housing stock and the wider environment as a consequence. A way also needs to be found through policy guidance to ensure that the range and mix of housing initially required, and then provided, is not then lost by allowing large house extensions which 'lose' the smaller (more affordable) houses that many communities need.

The need to reduce carbon emissions and to achieve zero carbon housing has been discussed for decades and enforceable requirements constantly deferred. The Code for Sustainable Homes originally required for all new housing to achieve level 6 / zero carbon by 2016. This has long since been withdrawn, with improvements to reducing emissions now mainly voluntary unless a Local Authority introduces specific policy requirements. Building Regulations have been slow to achieve much technical improvements and many other local authorities have introduced policy requirements and financial contributions relating to improving the design of new buildings and their wider environment. Whilst zero carbon may not be achievable in the immediate short term, improvements in technology and materials mean that many improvements (beyond those set out in Building Regulations) can be achieved in the interim and should be strove for. We would request that this be investigated further and appropriate policies proposed.

Regarding CIL, S106 receipts and Government funding, we agree that residents and communities should continue to have the access to a wide range of healthcare, community and education facilities, all of which are interlinked (eg sports can assist mental health etc). With poor local transport in rural areas, smaller settlements should be able to obtain access to funding to provide / improve local facilities within their community. The use of CIL should also be permitted to fund infrastructure improvements (such as road improvements) that would provide benefit to local communities, especially where they are supported by local policies such as within NDPs.

We have noted the current limits on chargeable CIL on development and suggest that the Council's current CIL charging schedule should be re-examined. It is appreciated that both S106 and CIL must ensure that proposed developments remain viable, but it has always been Government policy that the contributions should generally mitigate any effects of the proposed development, albeit simplifying the charging system. There are many uses in addition to residential and commercial that could viably contribute to the CIL charging schedule and compensate for their impact – eg. leisure centres and holiday parks, mineral and waste applications and others which have major traffic and other infrastructure proposals. We would support SDC reviewing its use of S106 and its CIL charging schedule accordingly.

#### ***Question 7 Spatial Employment Options***

We note the spatial options for employment land and would respond that potentially a mix of options should be adopted. Ideally, housing and employment, transport hubs (ie. railway stations) and community facilities such as hospitals and schools / further education facilities should be within close proximity in order to minimise commuting and road travel. Where road transport is necessary, this should be directed mainly to those main routes with capacity such as the A1 and M62, which align with the employment growth areas. Care will need to be taken to encourage priority usage of brownfield sites in appropriate locations, where environmental impacts including on Green Belt, SSSIs and other important landscapes (whilst also avoiding flood risk areas) are not adversely affected.

#### ***Question 8 Settlement Hierarchy***

For sustainability reasons, we consider that the majority of development must be located in those settlements with adequate local services. There has always been a natural settlement hierarchy where larger settlements have more facilities and act as a hub. To a certain extent, community activities will often be on a voluntary basis and will often share physical spaces – eg use of a village hall – in smaller settlements. But basic services such as a reasonable sized shop and post office ensure that residents do not need to travel to access everyday needs, especially when many bus services within Selby District are irregular and cost prohibitive for regular use for those without access to a car. Investment is also needed in many rural areas (including Escrick) to obtain good quality mobile and internet connection in this digital age, which is needed by both residents and local businesses. Commuting to work, including to the Leeds conurbation, means that access to the rail network is also important, as outlined above; settlement hierarchy and proposed growth must have joined up thinking to reduce distances and rethink travel options for people and goods within and into / out of the District.

We would support a review of the settlement hierarchy. We consider that for the options being considered, the definition of large and small villages (and their relationship to DSVs, which may now be redundant as a consequence of this discussion) should be re-examined. The definition of 'large villages' appear to vary in options 1 and 2 (see both plans), with option 2 defining larger villages with those having upwards of 1000 households and consequently generally have better key services and community hubs. This is a more appropriate definition. As also outlined above, there is a need for small sites for small builders and to ensure that smaller villages and settlements do not stagnate; it should be the role of the NDPs to work with their communities to allow small scale well designed development to meet local needs and include policies and land allocations as appropriate to their local circumstances.

#### ***Question 9 - Criteria for choosing a location for a new settlement***

Our concern is that the criteria currently suggested for a possible new settlement appear to ignore much of the economic and environmental logic to closely link employment and housing, and easy access to the rail network to reduce travel by road where possible. If as a consequence of those

choices, a new settlement forms part of the need for new housing in close proximity to strategic growth and infrastructure and new employment opportunities near to key transport hubs, then this may require further examination. A new settlement should not be perceived solely as a housing allocation with associated services; it should be a mixed use scheme including major employment opportunities, such as those cited in the 2017 EDF including the strategic sites stated and the M62 Strategic Development Zone / Energy Corridor. These are exciting initiatives that would be supported by some uses being contained within or nearby to a new settlement, which could enhance the viability of some proposals. These are the priorities that should drive the location of a potential new settlement, should it form part of the options for medium and longer term housing needs.

### *Question 10 Spatial Housing Options*

There is no one size fits all and a range of spatial housing options should be considered. Whilst we believe that for sustainability and climate change reasons employment and housing should be closely aligned, with good quality services provided / expanded within larger settlements where this is viable, there will always be a role for flexibility and for some small scale growth in the smaller settlements. Thus the majority of housing should be closely aligned with key facilities, employment and investment opportunities and key transport hubs, but with smaller settlements in less constrained parts of the District also being permitted some local growth to meet local needs and sustain rural communities.

We believe that the NDP provides the optimum opportunity for communities in the smaller settlements to have their say and state what type of and how much housing should be provided and where it should be located, in order that small numbers of houses can be accommodated to meet local needs. At the top end of the scale, Selby Urban Area has under-delivered against its Core Strategy target; but investment in key infrastructure (such as the work being proposed under the Transforming Cities Fund to enhance and open up the area around Selby Station to provide improved access to the town centre and key redevelopment sites) could bring real improvements in housing and the economy of Selby Town. Allocating the main housing numbers here and near to other existing and proposed employment hubs, with easy access in particular to the railways and motorway hubs, would encourage investment where it is most needed. This would meet the NPPF's requirement for local planning authorities to promote the development of a good mix of sites, suitable for both large and small housebuilders.

This combined strategy (of small scale development on small sites in the villages / rural areas, and larger sites in the main towns / employment hubs) would also help meet the NPPF's requirement in para 68 that at least 10% of all new housing should be provided on sites no larger than 1 hectare. Likewise, para 69 states that 'Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) suitable for housing in their area.' This was included in the NPPF in order to provide small and medium sized sites for one off self-builds, small custom build developments or small developments by local developers (3-4 plots) and may be the optimum amount of growth for the smaller villages with limited services and where some sensitive well designed growth would be supported. This would offer the opportunity for villages such as Escrick to grow in an organic and unique manner, commensurate with its size and character. Other ad hoc opportunities may also exist for well designed infill plots and barn conversions within or adjoining existing small groups of housing, which will also provide for local housing needs.

The concern about new settlements is not so much whether but how they can be properly developed. An appropriate location may be agreed, but it is the content of that settlement and that all its effects must be properly mitigated that is important. For a community to develop within it (rather than it just being a housing estate), it is important that infrastructure and provision of sustainable drainage systems and all infrastructure are provided upfront, prior to first occupation. Public open space,



walkways and cycleways and other environmental areas, schools, village halls / community hubs, libraries etc must all be provided on a phased basis in tandem with the housing, as must the major employment units (that justify the location), small managed workspaces, public transport hubs etc. A range and mix of housing must be provided, including for 1<sup>st</sup> time buyers, older people (including potentially a care village) and affordable housing. Any policy must make clear that proposals will secure all components by an agreed Masterplan within a S106, to ensure that any promises are delivered in due course.

#### *Question 11 Green Belt*

As stated, Green Belts should only be 'should only be altered where exceptional circumstances are fully evidenced and justified' (see NPPF paras 136 – 138). Therefore if there is a strategic overarching need to review boundaries to meet the linked economic / employment and housing imperatives as outlined above, then 'the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development' as set out in the guidance. It is unlikely that piecemeal review of Green Belt boundaries around various villages would meet the 'exceptional' test, as opposed to potentially the exceptional need for a new settlement (if this can be demonstrated). However, for smaller sites at the detailed level, NDPs may be an appropriate mechanism to review Green Belt boundaries, with the same exceptional circumstances demonstrated if required.

#### *Question 12 Development Limits*

Development Limits are there to restrict unlimited expansion of villages into open countryside. They have a key role to play but should be regularly reviewed. The NDP is the ideal mechanism to specify policies that encourage good design, resist 'urban cramming' in villages and review boundaries as required. Additional flexible policies to permit appropriate 'rounding off' adjacent to existing villages and small groups of rural housing, especially where meeting local needs and for affordable housing, should be considered on their merits in the interim. Thus small scale incremental occasional development would be facilitated as required, guided preferably by NDPs which review boundaries as part of their collaborative work with their local communities.

#### *Question 13 Strategic Countryside Gaps*

Strategic Countryside Gaps play a strategic role – as per Green Belts – in preserving appropriate gaps between and areas of openness around settlements, which provide opportunities for leisure and recreation. These should be protected from all forms of development, including waste and minerals, unless they comply with the permitted uses allowed in national guidance. As per Green Belts, there may be circumstances where review of detailed boundaries may be needed (as per above), but the principle of Strategic Countryside Gaps and the role they perform must not be undermined.

We trust that these comments are of assistance and look forward to being involved in the consultation process further as the Local Plan progresses.

### **Escrick Parish Council**

#### **2.3.20**