

STILLINGFLEET PARISH COUNCIL response to

Selby District Local Plan Preferred Options Consultation 2021

Your consultation period has fallen during a period of national lockdown when public meetings are not possible. We found that public awareness of the Consultation was very low: a promised letter to every household was not delivered in timely manner (still not received on the day that Consultation responses are required); given the difficulty of communication, the time given for a response was/is unrealistically short; the print and online media publicity has been poor (and in any case this would favour certain demographics over others); the document is very long and detailed, referencing many lengthy supporting documents, while the time you have given us to canvas and organise the views of our community is very short. We have embodied the various views of all residents who have responded to our enquiries; **most respondents were against the STIL-D proposal.**

We consider that the issues mentioned above to be a serious procedural defect of the entire Consultation process. Therefore, we believe that Selby DC should treat any conclusions it may make from all public responses as potentially unsound. Nevertheless, we have prepared our observations as requested which we have placed under seven main headings.

1. A basic understanding of the geographical constraints of the Selby District
2. Problem of continuing to place new housing spread across all existing settlements
3. Review of the locations of the three new town sites
4. Specific problems with STIL-D site
5. Considering the two sites in the western sector (Burn and Church Fenton)
6. A better new town solution?
7. Specific responses regarding Stillingfleet.

1. The Geographical character of Selby District and its consequences.

The Selby Area has three towns with a combined population of 31,132 (33%). The rest of the population comprising 67% live in small villages, none of which have significant services, as revealed in your analyses. To a large extent the residents of these villages have to travel to get to work and find other services of any significance. In reality this means Leeds, York or Selby. The district, lying within "The Vale of York" is essentially flat and prone to disruption from periodic flooding in many locations. The main geographical feature of significance are the rivers Wharfe and Ouse running roughly from north to south which divides Selby District into two sectors. There are only two adequate bridge crossings: The A64 bridge over the Wharfe in the north-west taking the Tadcaster bypass, and the A19 Selby by-pass bridge over the Ouse in the south-east. There is a minor, congested single-file swing-bridge over the Ouse at Cawood with a 10T weight limit which is constrained on the town side by 3 pinch points and very narrow streets and on the north side by low lying fields which flood annually. It is already overloaded at rush hours by back up of traffic in each direction. The constraints of the Cawood Bridge renders it unsuitable to be regarded as a primary or even secondary route for freight or commuting. The immutable geographical split into two sectors East and West by the rivers must rank highest in the criteria deployed to influence any development planning. We support the reservations expressed by Cawood PC in their response to the Consultation.

The HEDNA report Fig 44 shows the five large centres of employment in the area to be located west of the rivers, and none on the eastern side. Selby straddles both sectors. In addition, Fig 41 of HEDNA shows that employment in Selby District will remain level or even fall in the period from 2017 to 2039. This compares with a small UK growth rate of 0.53%. These predictions must place a question mark over the need for any new housing once the backlog has been redressed, and makes the cautious, steady expansion of the Sherburn+Gascoigne Wood option the less risky way forward.

There are no railway stations in the eastern sector other than the Selby station which serves both sectors. However, the western sector contains several stations with lines serving east/west as well as north/south for both commuter and freight traffic.

The East sector has no motorways whereas the western sector is bounded on its external edges by the A63 and A1(M) connecting to the M62 and M1 leading to all parts of the UK.

Selby District is protected and constrained by the Leeds Green Belt to the west and the York Green Belt to the north.

Conclusion: We believe that the restrictive character of the river geography, access to employment, transport facilities (both road and rail) and current settlement distribution of the Selby district should be the key determinants when deciding on a sustainable Local Plan.

2. The possibility of extending existing villages.

We agree with the contention HG2, that it is not tenable nor acceptable to attempt to satisfy future housing needs by continuing past policies which allow significant incremental extensions and infills in villages. This increases pressure on already inadequate local services and encourages widespread commuter traffic and travel to school and for shopping in the larger centres, which contributes to congested roads, pollution and the poor condition of road surfaces. It is rare that a new element of infrastructure improvement is coupled with any particular village housing development. It is notable that the record of actual windfall development in villages in recent years has significantly exceeded the forecasts and expectations. We believe this is an early indicator of pressure which will only grow unless a New Town approach is taken. We agree that it will still be acceptable to place some housing in villages where there is demand providing those small-scale developments do not diminish the amenity and built landscape of the villages or contribute to densification. It is also important that any development should be compliant with conservation rules where relevant and compatible with any Neighbourhood plan or Village Design Statement. (from responses received from residents it is evident that there is a significant misunderstanding of the effect of removing the development limit.)

Conclusion. It follows therefore that we endorse the proposal to introduce a New Town policy which will remove much of the pressure to extend villages, whilst recognising that there remains scope for a limited amount of compliant infill and conversion.

3. The proposal to create a New Town at one of three sites.

The consultation proposes three sites which have been selected by Selby where it may be possible to build a new town of 3000 dwellings or more: Burn, Church Fenton and Escrick/Stillingfleet (STIL-D). Our concern is that 3000 households may not be sufficient to warrant the incorporation of a full suite of supporting services. - but that is not a debate for this response so we will restrict our comments to the current proposals.

In order to identify where a New Town should be located the Consultation Paper proposes a very wide variety of influencers ranging from flooding, employment, to biodiversity and quality of life.

As set out in 1. above, our opinion is that the primary criteria which should be used to lead to a choice of location are the geography of the area, employment opportunities, transport, commuting and appropriate land availability. We expect the Authority to insist on excellent architecture including provision for cycling, walking, playgrounds and sports-fields, preservation of heritage and biodiversity as a matter of course. It is easy to propose such standards, but we know it is not easy to prevent slippage in standards when the building contracts are in the hands of national housebuilders. It would be sensible to create a Special Purpose Development Corporation to oversee these ambitions in the long term.

If we consider transport and commuting first, it is self-evident that the sector of the Selby District to the West of the river line has easy access to local and national train lines (Burn is within easy reach of Selby station which is itself funded for development and Church Fenton has three rail stations in easy reach) for commuters and freight and relatively short access routes to the A1, M62 and M1 allowing easy transport links north, south, east and west. To place the new town with at least 6000 working adults on the East side of the river network at STIL-D would be a deliberate act of self-harm cutting off the New Town inhabitants from the five main employment centres in the Selby District and other main employment opportunities in the West Yorkshire conurbation and further afield. They would have to face an already congested A19 for their commute (Cawood bridge, which has been closed for several weeks this winter, will present serious problems for the commuter) or be restricted to employment in the towns of Selby or York. At busy times, the A19 is already at gridlock with tailback from the A64 right past the proposed C309 junction to STIL-D. With the additional traffic flows from the Escrick Clay Pit, the proposed Waste Transfer facility, the increasing commuter traffic from the 650 homes at Fulford Germany Beck, the proposed caravan park at the North Selby mine site, and the proposed office park on the Designer Centre, it is inevitable that the A19 will be overwhelmed. The A19 problem is further exacerbated when the low-lying roads in and near Naburn flood, and traffic is obliged to stay on the A19.

As for more regional commuter travel the STIL-D site is 15 miles from both the A1(M) and the A62, imposing an additional 30mins or more of commuting time on any longer commuter journeys.

The plan claims that STIL-D would have good access to services and employment. It is plainly untrue to make this assertion when a majority of residents in the villages adjoining the STIL-D site in fact already travel by car to either York or Selby or even further afield for work and employment. This will not change or improve traffic flow if the additional vehicles from STIL-D join the queues.

4. STILLINGFLEET/004 / STIL-D (Land South of Escrick Road)

We believe that other locations are better matched to the draft policies in the plan and that this site should be rejected.

The following statements made in the Consultation are questionable for the reasons given:

- **4.1 We do not agree that “the Site has good access to services and employment”:** As outlined above, STIL-D is over 8 miles from the services in York and Selby via the congested A19. There is no realistic opportunity for sustainable transport use (rail or cycling). There is no rail, and the cycle track is unlikely to be used by many for cycle to work because the surface is unusable, unlit and remote, and distances too far to cycle to work in all weathers. There is severely constricted access to the five District employment hubs. It is misleading to describe this as good access to services and employment.
- **4.2 We do not agree that the site has “Proximity to the Road Rail Network - Good sub-regional accessibility”:** The site is over 7 miles from the nearest passenger train station, and relies on access via the congested A19 corridor. It is at least 30 minutes’ drive from both the A1(M) and M62 motorways. Therefore, the statement in the Consultation is misleading.

We also note:

- The proposed site is less than 600m from the current development limit of Escrick village.
- A site of this scale would have a significant impact on traffic levels on the A19, and should only proceed with the input of the Highways England and City of York.
- The site is grade 2 and 3 green field agricultural land.
- Heron Wood, an Ancient Woodland, sits in the centre of the proposed development, with plans for several cycleways, footpaths, and planned play areas all of which will be detrimental to the present colonies of a wide variety of wildlife. A second ancient woodland (Moreby Wood) lies 300m across the Escrick Road. These ancient woodlands are delicate and irreplaceable ecosystems as well as beautiful. Public bridleways run through both woodlands so their beauty can be seen and shared by all. If the development at STIL-D were to go ahead, it is unavoidable that an ancient woodland in the middle of, or right next to, a large housing development will be seriously harmed
- Stillingfleet is already blighted at rush hours by rat-run traffic avoiding both the A19 and A64 coming through the village main street on the B1222 over a narrow bridge and past the school bus pick-up and drop-off points.
- Stillingfleet residents have had to live with the threat of flooding for many years and great concern has been expressed regarding the proposal to discharge both treated foul and surface water into the beck from the STIL-D development. The Green floods regularly and the additional water discharge from upstream STIL-D would add to problem.
- We support the plan’s ambition to provide easy access to carbon free transport, in particular the need to encourage commuter cycling. In this respect it should be noted that from STIL-D it is 9 miles via the ‘Sustrans’ cycle path to central York and Selby is nearly 8 miles. The route to Selby has no separate cycle path for parts of the route. The Sustrans cycle track has very poor surface condition throughout, is damaged by tree roots near the surface and is unlit and isolated in several sections making it unsuitable for personal safety reasons. Whilst suitable for daytime

leisure use, the Sustrans track fails to deliver the necessary conditions to qualify as meeting any sustainable commuter transport measures.

Conclusion. We recommend that Selby DC acknowledges that the most suitable place for a New Town is in the western sector of the District (where both sites are brownfield sites), in order to take advantage of the existing road and rail networks and to avoid the serious restriction on free movement posed by limited river crossings for commuting and access to employment hubs. The STIL-D site is the least suitable of the three candidate sites.

5. Where in the western sector should the New Town be?

We have already made the case for any New Town to be situated in the western sector of Selby District. In that sector Burn and Church Fenton have been proposed in the Consultation.

Church Fenton.

Church Fenton is a brownfield site which means minimal loss of farm land. There is some recently established media activity on the Airfield and this will give opportunities for local business creation and expansion if the local population identifies and responds to the stimulus of the new Airfield activity. Church Fenton has a passenger station and residents could also use the Ulleskelf or Sherburn stations if the routing was more suitable for them. For road commuters and road freight, the site is within easy reach of the A64, A1/M62 and M1 network. Church Fenton is also close to Gascoigne Wood and Sherburn in Elmet with two industrial sites offering immediate local employment opportunities. Church Fenton does not have a significant service infrastructure so that development would be necessary as with the other sites selected. In the very long term HS2 will join the East Coast mainline at or near Church Fenton which we consider will be a disadvantage because the trains will be travelling fast at this point and it is very unlikely that mainline HS2 trains will stop at intermediate locations.

Burn.

Burn, like Church Fenton, is a brownfield site meaning minimal loss of farm land. Burn is within easy reach of Selby station which is due for expansion and refurbishment. One could envisage a rapid transit bus service from Burn to Selby when commuter patterns justify. For road commuters and road freight the site is within easy reach of the M62/M1/A1(M) network without the risk of flooding. Since the Burn site is already in the ownership of Selby it provides the best recovery of land value capture for the community – the first cardinal principle of Garden Village design. See Town and Country Planning.

Neither Church Fenton nor Burn have the embryonic infrastructure of services that are present at Sherburn, but both are brownfield sites, a factor which should weigh heavily in their favour compared with STIL-D, which is all good farmland. Burn has short access to the M62 down the A19 and would have a symbiotic benefit from the industrial and commercial activities planned at Eggborough.

Conclusion.

On balance, of the options offered in the Consultation, we are of the opinion that Burn would be the appropriate choice for New Town.

6. A better solution?

In considering the geographic imperatives that bring Church Fenton and Burn into focus, we suggest that this consultation should also consider Sherburn in Elmet/South Milford as having New Town potential for the following reasons:

- i. It is a recently expanded village in which the infrastructure support has yet to catch up with the housing expansion. Recent development has encouraged mass housing estates with no planning gain for the wider community.
- ii. All Sherburn residents would benefit from a renewed focus on incremental improvements to the embryonic town centre.
- iii. There is an existing bypass.
- iv. There is still substantial land available for housing.
- v. The potential for eventually merging with South Milford should not be overlooked
- vi. Two partly developed industrial estates lie immediately to the east of the village, with ample room for more commercial development.
- vii. Gascoigne Wood site lies nearby and provides important opportunities for further engineering and industrial expansion on c.50 hectares of brown field and a further c.50Ha of green field with a willing land owner.
- viii. There is a commuter train station at the end of the bypass and another at S Milford giving east-west and north-south connectivity respectively.
- ix. There is a freight terminal within the industrial park and at Gascoigne Wood giving encouragement and benefit to the growth of additional heavy engineering which is such a dominant facet of Selby DC economy.
- x. Road access to the A1 is only 4 miles with links to M1 and M62 giving access to the whole industrial employment landscape in West Yorkshire and beyond.
- xi. Sherburn is surrounded by Green Belt, but it is considered that this need not be an insuperable obstacle to further development. The Green Belt outline could be altered to accommodate additional development in the longer term by offsetting through the designation of additional replacement contiguous land nearby as Green Belt. Indeed, the NPPF provides a specific mechanism for altering Green Belt, following proper justification.

Conclusion

The Selby District Council should reconsider whether a plan offering the incremental development of the Gascoigne Wood to Sherburn corridor, including an upgrade to the Sherburn centre, would meet the needs for housing and industrial employment with less disruption than the present proposals.

7. The specific proposals for Stillingfleet.

The Local Plan is a matter of particular relevance in Stillingfleet for the following reasons:

- i. The removal of the Strategic Countryside Gap from the Green is **acceptable** provided that the status of the Green as a SINC is maintained (missing from the consultation paper but should be added for record purposes)
- ii. We would request that the Selby DC gives serious consideration to the introduction of a SCG on the east side of the village positioned so as to protect the village from encroaching waste treatment plant on the mine site and from the potential STIL-D in that direction.
- iii. We agree to the removal of the village development envelope around Stillingfleet. This is informed by the responses of residents to our rapid consultation in recent days. In particular, concern was expressed that the attitude of the Selby planners to our Village Design Statement and Conservation Area do not always protect the character of the village as they should. Any attempt to allow ribbon development along the B1222 by infilling towards Naburn would significantly erode the quality of the rural outlook and weaken the cohesion of the village life. We are also concerned by densification of development within the current envelope and would encourage Selby planners to ensure that future windfall housing development is varied and restrained (as provided in our VDS) rather than allowing the proliferation of identical characterless houses.

Stillingfleet/003 / STIL-C (Former Stillingfleet Mine, Cawood Road)

We believe this site should be rejected, for the many reasons that have been advanced to NYCC over the last several years, in summary:

- i. The NYCC failed to implement the planning condition that the site be returned to agriculture when coal recovery ceased.
- ii. A heavy large-scale industry in this remote location is incompatible with Selby's own Core Plan.
- iii. The site was not identified, thought suitable or included in the NYCC WMJP. It is an adventitious site.
- iv. The evaluation claims that the site has good proximity to the Road Rail network which is regarded as deliberately misleading if you understand the congestion on the A19 and the distance to the A1(M) and for rail the considerable distance to an appropriate freight terminal. The business plan for the Waste Transfer station reveals that the main recovered product will be trucked down to Nottingham, a route and distance which is incompatible with sustainable objectives.
- v. This is an antisocial activity that will have adverse impacts on air quality and environmental conditions, and destroy what has become a wildlife haven.

We repeat that this application should be rejected

In conclusion as regards Stillingfleet itself:

We request that consideration be given to

- a) creating a Strategic Countryside Gap to the east of Stillingfleet.**
- b) that the present development envelope be removed.**

c) that Selby Planning requires that any new infill development be in accordance with our Conservation Area provisions and Village Design Statement.

d) that densification is not allowed.