



Selby District Local Plan Preferred Options Public Consultation 29 January to 12 March 2021

COMMENTS FORM

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Comment Submission Statement

Your comments and some personal identifying details will be published in a public register and cannot be treated confidentially. Where practical, personal identifiers may be redacted, however Selby District Council cannot guarantee that all identifiers will be removed prior to publication of consultation records.

Your personal information will only be used for the purpose for which it was given, which is to ensure your comment is recorded, to contact you regarding your comments and to keep you informed of the preparation of the Council's Local Plan and of further opportunities to get involved. Further details are set out under the Planning Policy Privacy Statement:

<https://www.selby.gov.uk/planning-policy-privacy-notice>

By submitting a comment on the Local Plan Preferred Options Consultation, you confirm that you agree to this and accept responsibility for your comments.

Signed

Katie Atkinson / obo CPRENY

Dated

02/03/21

Completed comments must be received by the Council no later than 5pm on Friday 12 March 2021

Consultation Portal: <https://selby-consult.objective.co.uk/kse/event/36012>

Email: localplan@selby.gov.uk

Post: Planning Policy, Selby District Council, Civic Centre,
Doncaster Road, Selby, YO8 9FT

New site proposed?

If you have a site you wish to submit to us for potential inclusion as an allocation for new development, please complete a site submission form and attach a site location plan identifying the site in red.

The site submission form can be found on the Site Submissions webpage:

www.selby.gov.uk/site-submission-form

Local Plan Preferred Options Comments Form

Question 1

Please provide any comments here on the Sustainability Appraisal. Please ensure you clearly reference the section, paragraph, table or appendix.

The methodology used for the Sustainability Appraisal is appropriate.

Question 2

**Please provide any comments here on the Habitats Regulations Assessment.
Please ensure you clearly reference the section, paragraph, table or appendix.**

No comment

Question 3

Please let us know here if you have any General Comments. Please ensure you clearly reference the topic or document.

CPRENY are generally supportive of the draft Local Plan document and recognise the hard work that has gone into this draft. It is considered that a few policies could benefit from additional strengthening but in broad principles the policies are in conformity with national policy.

CPRENY are supportive of the Council's approach to Green Belt and the protection of the landscape and countryside.

Please note CPRENY has only responded to those questions of particular interest to them as The Countryside Charity. Detailed opinions are given below, with particular reference to the proposed new garden village.

Question 4

Please let us know here if there is a Local Plan issue which we have omitted.

Question 5

Please submit any comments on the evidence base documents here. Please specify which document you are commenting on and reference any section or paragraph.

CPRENY welcomes the fact that the Council has undertaken a review of the Local Landscape Designations following the 2019 Landscape Character Assessments. This important piece of evidence has reviewed and reaffirmed the value and appreciation attached to the Locally Important Landscape Areas identified by the Selby District Local Plan (2005) which identified the sites but added no context to the reasoning behind their designation.

CPRENY welcomes the proposed retention of the existing LILA's and further supports the designation of those candidate LILA's identified by the Review. It is considered that these designations will help preserve the special qualities which comprise the landscape in these locations whilst the management recommendations will assist the local planning authority determine what development (if any) is appropriate within them whilst protecting the natural features.

It is noted that the Review document sets out the candidate areas as 4 distinct areas and separates the Northern and Southern Magnesian Limestone Ridge. Given the distinct 'gap' between the two areas, whilst properties may be similar, CPRENY believe that for ease of reference and to support the evidence presented in the Review the Local Plan should also refer to 4 areas and differentiate between the two sites.

Question 6

Do you support the Vision for the District?

(please select one answer)

Yes**X**.....☐ No☐

If not, please explain your reasons and explain how you would like to see it changed.

CPRENY supports the vision that by 2040 Selby District will continue to be attractive place to live within an attractive rural environment. The attention paid to utilizing the district's excellent transportation links is welcomed alongside the need to promote the use of sustainable forms of transport such as walking and cycling, which the topography within the district lends itself to.

CPRENY are encouraged by the Council's vision that 'significant progress' will have been made towards meeting objectives for net zero carbon emissions and net gains for biodiversity, however, consider that this could be strengthened given the Government's binding legal commitment to have reached net-zero by 2050. It is hoped that the Council would therefore consider adopting a vision which asserts what that progress would have been i.e. by 2040 Selby District will have met its objectives for net zero carbon emissions and significantly achieved net gains for biodiversity across the district. This would indeed help enable the York and North Yorkshire to become the first carbon negative sub region of the UK and help the country be well on its way to meeting national targets.

Question 7

Do you support the Vision for Selby Town?

(please select one answer)

Yes**X**..... ☐ No ☐

If not, please explain your reasons and explain how you would like to see it changed.

The vision for Selby Town is supported in general terms. However, CPRENY feel that the vision would benefit from mention of the importance that blue/green infrastructure networks will have made throughout the town and the health and well being benefits associated with these.

Question 8

Do you support the Vision for Tadcaster?

(please select one answer)

Yes**X**..... ☐ No ☐

If not, please explain your reasons and explain how you would like to see it changed.

CPRENY fully endorses the vision for Tadcaster and the recognition that there is a need to re-establish the vacant and derelict sites and properties within the town. CPRENY welcomes the vision of a conservation-led regeneration scheme to capitalize on the town's high-quality built heritage and attractive riverside setting in order to provide an attractive environment for residents, businesses and visitors with opportunities for sustainable transport throughout.

Question 9

Do you support the Vision for Sherburn in Elmet?

(please select one answer)

Yes**X**..... ☐ No ☐

If not, please explain your reasons and explain how you would like to see it changed.

Question 10

Do you agree with the proposed Local Plan Objectives?

(please select one answer)

Yes ☐ No ☒ X ☐

If not, please give the reasons for your answer and explain how you would like to see them changed. Please indicate the Objective(s) you are talking about by referring to their title.

The You Heritage and here Place Now - Making Objective Objectives does not mention the term 'significance' and as such is not well aligned with the NPPF. The reference to 'special interest' is not considered to be sufficient in this context.

However, CPRENY supports the remaining proposed Local Plan Objectives in general terms and especially welcomes the objective regarding Climate Change and Flooding. However, CPRENY consider that the objective relating to the Natural Environment could be strengthened by inclusion of the word 'tranquillity' or 'tranquil areas' amongst the list of matters to 'protect and enhance' which would support the designation of the LILAs as some were noted for their tranquillity.

Furthermore, it is considered that the importance of maintaining the 'York and West Yorkshire Green Belts' within the district should be mentioned within an objective to ensure coalescence of settlements is avoided and areas of open space maintained – presumably within the 'Natural Environment' or 'Open Spaces' in relation to extended Green Infrastructure.

Do you agree with the preferred approach to Sustainable Development? *(please select one answer)*

If not, please give the reason for your answer and explain how you would like to see it changed.

The revised NPPF consultation sets out that the wording of the presumption in favour of sustainable development (paragraph 11(a)) has been amended to broaden the high-level objective for plans to make express reference to the importance of both infrastructure and climate change. CPRENY strongly support this and recognise the need for the Council to ensure the same measures are undertaken within the final version of SG1 to ensure conformity with national policy although would argue the need for the words 'and decisions' to follow on from 'for plans..'.

Question 12

Do you agree with the preferred Spatial Approach?

(please select one answer)

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 13

Do you agree with the preferred approach to Selby Town Regeneration Area? *(please select one answer)*

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 14

Do you agree with the preferred approach to Development Limits?

(please select one answer)

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY are supportive of this policy which will enable appropriate windfall development within smaller villages to meet their needs commensurate with the character of individual settlements. Any areas outwith the built form of the settlements will be considered open countryside and as such proposals will only be supported where they are in accordance with national policies or specific Local Plan policies.

Development Limits surrounding larger towns and villages will enable small scale infill development and the redevelopment of brownfield sites and thus ensure that development does not extend beyond the built form and into the open countryside. Providing a specific boundary allows all readers of the Local Plan including residents and developers to comprehend where development should be located and where it would be opposed setting a clear direction for all. This approach is entirely appropriate and supported by CPRENY as being in conformity with national policy.

Question 15

Do you agree with the preferred approach to Development in the Countryside? *(please select one answer)*

Yes ☐ No ☒X..... ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY is mostly supportive of the preferred approach to policy SG5 and considers it is in conformity with current national planning policy. However, cannot understand why the Council would 'exclude' hamlets or small groups of buildings which are not included within the settlement hierarchy as being within the open countryside. Surely the very fact that these locations are not within the settlement hierarchy and not large enough to warrant any form of windfall development by virtue of the fact they are so small and will not be able to achieve any infill or local needs opportunities requires them to be considered 'open countryside' in line with most other local planning authorities across the county. There is no justification within the supporting text to state why these have been excluded in this way. It is, therefore, assumed that this should in fact read 'includes' in which case, CPRENY would fully agree with the preferred approach to development within the countryside.

Question 16

Do you agree with the preferred approach to Strategic Countryside Gaps? *(please select one answer)*

Yes ☒ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Strategic Countryside Gaps (SCG) are not considered the same as Green Belt in planning terms, however, across Selby district have been used to ensure that neighbouring settlements in close proximity maintain their identity and do not merge.

The SCG Review 2021 considers and assesses 22 existing and potential SCG (identified and proposed in 2015) across the district and recommends either the retention, boundary amendment or removal in each case. In summary, the report proposes the retention of 8 SCGs (including some merges) and the creation of 1 new SCG. It also proposes the deletion of 2 SCGs at both Stillingfleet and Hensall North/South.

Whilst CPRENY would usually question the removal of any SCG, CPRENY is aware that the latter has been petitioned by the Parish Council to enable community cohesion by removing the sense of separation between the two distinct areas and as such would not object to this. In relation to Stillingfleet, it is acknowledged that this site is protected via a Village Green designation which is difficult to remove and as such would prevent development causing coalescence. CPRENY are aware that this site is also designated as a SINC which should be acknowledged in the document also.

Stillingfleet Parish Council have advocated for a further SCG to be considered on the east side of the village between the settlement and the waste treatment plant which CPRENY would not oppose, although it is recognised that this would need to be formally submitted to the Council for consideration and assessment.

CPRENY whilst always welcoming of new SCG designations, fully acknowledge the reasons set out within the Review for why some proposed gaps have not been recommended for designation.

Question 17

Do you agree with the proposed amendments to the following Strategic Countryside Gaps?

(please select one answer for each question) the

The below fields are not editable! CPRENY Yes No agrees with all proposals

The removal of Hensall North / South?

☐☐

The removal of Stillingfleet?

☐☐

The amended boundary at Barlby & Osgodby?

☐☐

The amended boundary at Church Fenton East / West?

☐☐

The amended boundary at Cliffe / Hemingbrough?

☐☐

The amended boundary at Gateforth?

☐☐

The amended boundary at Thorganby?

☐☐

The boundary at Thorpe Willoughby?

☐☐

The new proposed Strategic Countryside Gap at Eggborough / Kellington?

☐☐

Please give the reason for your answer

The SCG assessment accurately assesses the role of the SCG and suggests appropriate revisions were necessary. In relation to Hensall and Stillingfleet, this has been addressed in the answer to question 16 above.

CPRENY has no objection to the merging of adjoining gaps to reinforce the designation and for clarification purposes, furthermore, those where the boundaries are to be extended are to be welcomed.

CPRENY consider that a new SCG is required to support the separation between Eggborough and Kellington and retain openness and thus supports this designation.

Question 18

Do you agree with the preferred approach to the Green Belt?

(please select one answer)

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY are fully support of the approach set out in draft Policy SG7 in relation to Green Belt which is compliant with national policy.

Selby district contains 19,240 Ha of Green Belt designation and is split between both the City of York and West Yorkshire Green Belt. CPRENY welcomes the fac that paragraph 4.30 of the draft Local Plan sets out that in order to deliver the current spatial approach it has not been considered necessary to amend the extent of the Green Belt in order to deliver sustainable growth within the district and acknowledge the fact that a review will be undertaken to assess whether any minor amendments to the boundaries will be required in particular circumstances.

The countryside near to where people live has never had a greater test of its importance to people's health and wellbeing than during the coronavirus pandemic. Since the first lockdown in 2020, there has been a surge in appreciation for the countryside, and the positive role that accessing green and natural spaces can have on our wellbeing. The pandemic also highlighted the inequalities of access to good quality green spaces, with those living in deprived areas, minority ethnic groups and people living with disabilities less likely to have such access, for example.

Green Belt is the countryside next door for 30 million people living in our large towns and cities. One of the primary roles of the Green Belt is to maintain the openness of the countryside, and it encourages housing to be placed near to where we work and the amenities we need. However, the potential of this land is much greater than this. The protection of this land also provides a space for nature and recreation, with it already containing a significant number of our nature reserves, as well as double the national density of public rights of way.

Through the protection and enhancement of Green Belt, we can increase the natural and recreational value of this land, as well as providing a natural solution to the climate emergency through its ability to sequester carbon. Crucially, the defining feature of countryside which is designated as 'Green Belt', is its permanence; the assurance that it will remain for generations to come to enjoy its benefits. The NPPF formalises this, through stating that development in the Green Belt or alteration of its boundaries should only occur under 'very special' or 'exceptional' circumstances, and should be done through the local plan process. As such any such Review by the Council should ensure that these VSC are properly justified.

CPRE, the countryside charity, led the campaign for the creation of the Green Belts. To date, they have been a great success in terms of protecting the countryside near to many of our towns and cities and reducing the damage of urban sprawl to both people and the environment. However, Green Belts continue to be threatened by development, decreasing the ability of this land to provide for nature, reduce the impacts of climate change, and people's access to green spaces.

Question 19

Do you agree with the preferred approach to Neighbourhood Planning? *(please select one answer)*

Yes ☐ No **X**..... ☒

If not, please give the reason for your answer and explain how you would like to see it changed.

Whilst supportive of Neighbourhood Plans, CPRENY do not believe that the Council's approach to Neighbourhood Planning is entirely consistent with national policy.

As currently drafted the preferred approach sets out that 'emerging Neighbourhood Plans will be expected to promote additional sites to those identified through the site allocations in the Local Plan or alternative suitable sites where it has been demonstrated that the allocations will no longer be delivered.' There is no objection to Neighbourhood Plans being able to allocate alternative or additional sites, however, Neighbourhood Plans should not be 'expected' to do this and CPRENY believe this should be reworded to reflect the Council's 'support' for this approach instead. Neighbourhood Plans do not *have* to allocate any sites for housing providing remaining policies are in conformity with and go further than Development Plan policies.

The NPPF provides at para 66 that 'where it is not possible to provide a requirement figure for a neighbourhood area the local planning authority should provide an indicative figure, *if* requested to do so by the neighbourhood planning body' (*my emphasis*). This allows, as has been done elsewhere in the county, a Neighbourhood Plan to allocate a site where the Local Planning Authority has not included the Neighbourhood Area within the settlement hierarchy and thus does not promote any sites there, or allows the Neighbourhood Planning Body the opportunity not to allocate a site.

Question 20

Do you agree with the preferred approach to the Design of New Development? *(please select one answer)*

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY support the preferred approach in general terms, however, believe it could be strengthened by reference to 'beautiful' design to better reflect the recommendations in the report by the Building Better Building Beautiful Commission. The report was commissioned with the aim of championing beauty in the built environment, as an integral part of the drive to build the homes that our communities need. This has been carried forward to the consultation on the revisions to the NPPF. Whilst acknowledging this is still a consultation draft, the Government are supportive of this narrative and as such the policy should reflect this. Government state that poor quality schemes should be refused and, where appropriate, replaced references to 'good design' with 'good design and beautiful places' within the NPPF.

Furthermore, and in line with proposed changes to the NPPF it is considered that the policy could be strengthened by explicit reference to the need for climate change mitigation in all developments and the requirement for net gains for biodiversity not just opportunities for wildlife and improvements to green infrastructure (blue infrastructure should also be mentioned here).

Question 21

Do you agree with the following preferred approaches to Tackling Climate Change?

(please select one answer for each question)

The below is not editable – CPRENY agrees with the preferred approach below

	Yes	No
	<input type="radio"/>	<input type="radio"/>
Communities and Infrastructure Resilience	<input type="radio"/>	<input type="radio"/>
Reducing Greenhouse Gas Emissions	<input type="radio"/>	<input type="radio"/>
Contributing to Low Carbon Travel	<input type="radio"/>	<input type="radio"/>
Renewable Energy Development	<input type="radio"/>	<input type="radio"/>
Improvements to the Natural Environment		

If not, please give the reason for your answer and explain how you would like to see it changed.

NPPF 2019 para 148 states that the planning system should “help to shape places in ways that contribute to radical reductions in greenhouse gas emissions..” The crucial phrase here is ‘shaping places’, because this highlights the need for the interventions to be spatial and designed to transform the pattern of development and movement within Selby District to make it better equipped for a low-carbon future. Since shaping places is what a Local Plan sets out to do, then compliance with NPPF requires that it should act, and it must do so measurably.

Whilst agreeing with the approach set out in broad terms in Policy SG10, CPRENY would urge the Council to be more ambitious as per our suggestion to the climate change objective in answer to Question 10. CPRENY believe to be measurable and focus attention on this important matter the Council should set a target reduction in carbon emissions in order to help them achieve their goals by 2040.

The TCPA & RTPI document Planning for Climate Change (2018) (para 2.2.1) sets out the legal position succinctly: “*Local planning authorities are bound by the legal duty set out in Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, to ensure that, taken as whole, plan policy contributes to the mitigation of, and adaptation to, climate change. This powerful outcome-focused duty on local planning clearly signals the priority to be given to climate change in plan-making. In discharging this duty, local authorities should consider paragraph 94 of the NPPF [note this refers to NPPF2012, para 94 being equivalent to NPPF2019 para 148] and ensure that policies and decisions are in line with the objectives and provisions of the Climate Change Act 2008 (Section 1) (discussed below) and support the National Adaptation Programme. For the sake of clarity, this means that local plans should be able to demonstrate how policy contributes to the Climate Change Act target regime, and this, in turn, means understanding both the baseline carbon dioxide emissions and then the actions needed to reduce emissions over time – which, in turn, means that annual monitoring reports should contain ongoing assessments of carbon performance against the Climate Change Act target.*”

Any reasonable interpretation of this combination of legal and policy requirements would lead to a Local Plan that, as a minimum, committed to a commitment to a quantified carbon reduction target for the district and suitable monitoring arrangements. These minimum provisions are all absent from the Selby Local Plan. These thoughts are echoed in the RTPI report <https://www.rtpi.org.uk/media/1566/planningforclimatechangelawandpolicybriefing2019.pdf>

Question 22

Do you agree with the preferred approach to Flood Risk?

(please select one answer)

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY supports the Council's approach in relation to flood risk and development.

Question 23

Do you agree with the preferred approach to Proposals which Affect the Historic Environment?

(please select one answer)

Yes ☒ ☐ No

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY generally agree with the spirit of this approach but consider the policy could be strengthened by different wording.

Para 4.67 should read: 'The more important the asset, the greater will be the weight given to its conservation/preservation'. Furthermore, the final sentence of the same paragraph states: 'seek to avoid the loss of any features of architectural or historical significance.' CPRENY consider reference to 'artistic and archaeological interest' should be added to accord with the revised definition of heritage significance within the NPPF. Also, it is recommended that the caveat 'wherever possible' at the beginning of the last sentence is deleted.

Question 24

Do you agree with the preferred approach to Heritage at Risk?

(please select one answer)

Yes ☒ ☐ No

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY generally agrees with the spirit of this approach but consider that the policy could be better worded. It is considered that additional words should be added to the end of the first sentence of point A to read: '[...] that contribute to their significance including their setting'.

As per the answer to question 22 it is considered that Para 4.73 should read 'The more important the asset, the greater will be the weight given to its conservation/preservation.' Furthermore, the final sentence of the same paragraph states: 'seek to avoid the loss of any features of architectural or historical significance.' CPRENY consider reference to 'artistic and archaeological interest' should be added to accord with the revised definition of heritage significance within the NPPF. Also, it is recommended that the caveat 'wherever possible' at the beginning of the last sentence is deleted. Also, the word 'Development' within the paragraph should not be capitalised.

Question 25

Do you agree with the preferred approach to meeting employment needs? *(please select one answer)*

Yes **X** ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

The Council's HEDNA has recognised a need for 110.2Ha of employment land should be delivered to meet economic needs of the District until 2040. A combination of two strategic sites have been identified at Gascoigne Wood Interchange and Olympia Park – providing 90.95Ha between them. Both of these sites benefit from proximity to existing transport infrastructure including rail links and proximity to principle urban areas. As such the tests of the NPPF are met in terms of reducing the need to travel and locating large developments close to transport links. This leaves a further 19.25Ha of potential employment land to find within the Selby District identified at other strategic sites across the district.

Question 26

Do you agree with the following preferred approaches to the Protection of Employment Land?

(please select one answer for each question) **The below are not editable - CPRENY agrees with the approach to protect employment land**

Yes No

**The protection of defined Key Employment Areas listed above The
protection of other existing employment sites and premises**

<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>

If not, please give the reason for your answer and explain how you would like to see it changed.

Employment land already committed within the planning process should be protected but only where there is a real chance of the sites being developed in a timely manner. Sites that have been allocated and not developed despite benefiting from pre-application enquiries or extant permission should not continue to be allocated if there is no realistic chance they will be delivered.

Question 27

Do you agree with the preferred approach to New Economic Development? *(please select one answer)*

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY consider this approach is the most appropriate to take when considering opportunities for new economic development on sites which are not allocated in the plan document. However, it is considered that the policy wording would benefit from the addition of the following to read:

'[...] will be supported within existing settlements, particularly on vacant or derelict sites which have been previously developed, where all the following criteria can be met.' This would ensure emphasis on brownfield first policy.

Question 28

Do you agree with the preferred approach to the Rural Economy?

(please select one answer)

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 29

Do you agree with the preferred approach to Tourist, Recreation & Cultural Facilities? *(please select one answer)*

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY are supportive of this policy particularly point D which will ensure the applicant's justification is accurately assessed prior to determination and ensure the protection of the countryside from inappropriately located developments.

Question 30

Do you agree with the following preferred approaches to Holiday Accommodation?

(please select one answer for each question) CPRENY supports the preferred approach for all the below

	Yes	No
Serviced and non-serviced holiday accommodation	<input type="radio"/>	<input type="radio"/>
Touring caravan and campsites	<input type="radio"/>	<input type="radio"/>
The imposition of conditions to restrict the use and / or period of occupation.	<input type="radio"/>	<input type="radio"/>

If not, please give the reason for your answer and explain how you would like to see it changed.

It is considered that in broad terms the policy offers an adequate approach to protect the district from inappropriately scaled, designed or located holiday accommodation of the above types. However, it is considered that the policy would be further strengthened by reference to the need to not have an unacceptable impact on sites of historical or archaeological importance or their setting.

Furthermore, specific reference to the need to adopt principles of climate change mitigation within the design of any new/extended holiday accommodation should be included alongside the need to provide measurable net gains for biodiversity on the site.

Question 31

Do you agree with the following preferred approaches to Town Centres and Retailing? *(please select one answer for each question)* **see below**

Yes No

The proposed hierarchy of centres

The proposed approach to out of centre development

If not, please give the reason for your answer and explain how you would like to see it changed.

In theory CPRENY agree with the preferred approach and especially to the approach for out of centre development. However, due to the ongoing decline of High Streets over a period of years and the changing nature of live/work patterns brought about (but considered likely to remain) because of the COVID-19 pandemic, CPRENY consider it would be prudent of the Council to consider an alternative approach for mixed town centre uses which offer residential (not just first floor development) and office/retail opportunities to help revitalise the High Street and Town Centre areas. It is considered that the Selby Gateway opportunities could help with this and should be considered in tandem with the regeneration of this area leading up to the Abbey in particular.

It is considered that the approaches described for Sherburn and Tadcaster are appropriate.

Question 32

Do you agree with the following preferred approaches to Local Shops?

(please select one answer for each question) CPRENY support both approaches

	Yes	No
The protection of existing facilities	<input type="radio"/>	<input type="radio"/>
Proposals for new local shops	<input type="radio"/>	<input type="radio"/>

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY fully support this policy and welcome the recognition afforded to the local shop and the service they can provide for small settlements. It is vital that these lifelines are supported to be retained in order to achieve the sustainability of the settlement and well-being of many residents.

Question 33

Do you agree with the preferred approach to Hot Food Takeaways?

(please select one answer)

Yes ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 34

Do you agree with the preferred approach to Advertisements?

(please select one answer)

Yes ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

It is considered that the word 'if' is missing from Point B in relation to illumination and the final sentence.

Question 35

Do you agree with the preferred approach to Infrastructure Delivery?

(please select one answer)

Yes ☒ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 36

Do you agree with the preferred approach to the Provision of New Infrastructure? *(please select one answer)*

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

In theory CPRENY are supportive of this approach but reserve the right to comment further on the table to be produced in the next version of the Local Plan.

Question 37

Do you agree with the preferred approach to the Protection of Community Facilities? *(please select one answer)*

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY consider that the protection of community facilities plays a vital role in ensuring a thriving community. It is therefore considered that the community should be consulted prior to determination of any proposal resulting in a loss of existing facility with scope for the community to consider opportunities for a 'community owned scheme' to ensure its survival where appropriate.

Question 38

Do you agree with the preferred approach to Telecommunications and Digital Infrastructure Provision?

(please select one answer)

Yes **X** ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 39

Do you agree with the preferred approach to Sustainable Transport?

(please select one answer)

Yes ☒ ☐ No

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY are supportive of the principles of this policy, however, feel that this could be strengthened by reference to the need to utilise existing opportunities of the canal network as a mode of freight transport.

Question 40

Do you agree with the preferred approach to Parking and Highway Safety? *(please select one answer)*

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 41

Do you agree with the preferred approach to Public Rights of Way?

(please select one answer)

Yes ☒ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 42

Do you agree with the preferred approach to the provision of Motorist Service Areas? *(please select one answer)*

Yes ☒ ☐ No

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY consider it important to have a dedicated policy to MSA's rather than purely rely on other plan policies particularly because of the extent of strategic road network in the district.

Question 43

Do you agree with the preferred Spatial Distribution of Dwellings across the proposed Settlement Hierarchy?

(please select one answer)

Yes ☒ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Development within Selby District is constrained by the two different Green Belts, Strategic Countryside Gaps and the fact that vast swathes of land are, due in part to the flat topography, liable to flooding from the extensive tidal river network. CPRENY are fully supportive of the Council's decision to retain and enforce the SCGs across the district and not to release Green Belt land for development which is entirely in conformity with the NPPF which states this should only be done in exceptional circumstances. As such, CPRENY are supportive of the spatial distribution of dwellings across the district as proposed by Option A in the Council's 'Preferred Spatial Strategy' document which makes up part of the evidence base.

It is considered the right approach to direct development to the principal town and market towns prior to the villages and countryside. The numbers proposed by the local planning authority appear representative of the needs of those locations taking into account the current and historic levels of growth at each. Further the proposed targets for growth directed to Tier 1 and 2 villages appear appropriate for the level of existing residential development and number of services. This should ensure that the services already located there are sustained without placing too much pressure on them or altering their character detrimentally.

Smaller villages have a limited level of services and should only allow for windfall development during the plan period to meet the needs of the community.

The planning reasons behind the decision to allocate land for a large urban extension at Eggborough are understood and recognised. Whilst this would facilitate a large swathe of greenfield land, the village is in close proximity to the former Kellingley Colliery and former Power Station which have recently been granted permission for employment use. Similarly, good transport links are in existence and proposed via Wakefield District Council and will offer suitable public transport links and be located close to major road linkages reducing the need to travel on local road networks. Whilst the character of this tier 1 village will alter it is considered a better option than the release of green belt at this stage.

Further, the proposed allocation of a site for a new settlement is understood and supported by the NPPF. CPRENY welcomes the fact that the SCGs and Green Belt designations will not be altered as a result of development pressure but would urge the Council to ensure that every possible opportunity for brownfield development has been exhausted prior to the large greenfield release.

Question 44

Do you agree with the following preferred approaches to Residential Development:

(please select one answer for each question) **Yes to all**

	Yes	No
In Selby Urban Area, Tadcaster, Sherburn in Elmet, Tier 1 Villages and Tier 2 Villages?	<input type="radio"/>	<input type="radio"/>
In the Smaller Villages?	<input type="radio"/>	<input type="radio"/>
In the countryside?	<input type="radio"/>	<input type="radio"/>

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY fully supports this approach

Question 45

Do you agree with the following preferred approaches to:

(please select one answer for each question)

	Yes	No
Delivering house types and sizes according to the evidence in the Housing and Economic Development Needs Assessment appropriate?	<input type="radio"/>	<input type="radio"/>
Meeting the requirements of the Nationally Described Space Standards (2015) for bedrooms and storage spaces?	<input type="radio"/>	<input type="radio"/>
Ensuring that all new homes are built to M4(2) and M4(3) standards?	<input type="radio"/>	<input type="radio"/>
The proposed minimum residential densities?	<input type="radio"/>	<input type="radio"/>

If not, please give the reason for your answer and explain how you would like to see it changed.

The approach is consistent with national policy and CPRENY welcomes the fact the Council are encouraging a Lifetime Homes Standard.

CPRENY are pleased that the Council have promoted the most up to date documents for space standards and recognised that these are likely to change so welcomes the recognition afforded to 'successor documents' in the draft Local Plan.

The proposed minimum densities seem appropriate and CPRENY welcomes the variable options for settlements within different tiers to ensure the character of such places are maintained.

It is recognised within the draft plan that the Council's latest HEDNA should be used as a starting point when determining applications for housing development on sites not allocated within the plan as this document sets out the most accurate level of need across the district in relation not house size. It is hoped that this will be taken on board and reflected in subsequent applications and decisions.

Question 46

Do you agree with the following preferred approaches to:

(please select one answer for each question)

	Yes	No
Deliver a minimum of 20% affordable housing on developments of over 11 dwellings / 0.5 ha in size? No	<input type="radio"/>	<input type="radio"/>
The sizes, types and distributions of affordable homes in market-led housing developments? Yes	<input type="radio"/>	<input type="radio"/>

If not, please give the reason for your answer and explain how you would like to see it changed.

According to the Council's most up to date HEDNA, there is a notable need for affordable housing, and the provision of new affordable housing is an important and pressing issue in the District. The Council has a preferred approach which sets out that a minimum of 20% of dwellings on developments of 11 or more dwellings (0.5Ha) should be delivered on site. However, this will not deliver the higher level of need identified across the district via the HEDNA. Whilst viability is understood this does not negate the need. As such CPRENY would urge the Council to be more ambitious and introduce a variable target for affordable housing as has been done across other parts of the County. For example, the Local Plan could require a 30% delivery on site in Selby, with a 25% target in Sherburn and Tadcaster, followed by 20% in Tier 1 and 2 village where appropriate. This may not deliver the full amount required but will go further towards achieving it. CPRENY would also suggest that the policy should require independent verification of viability from an external provider selected by the LPA prior to determination of the proposal, in order to prevent much cited viability issues at reserved matters or even outline stage where an allocation has been promoted on the understanding that affordable units are to be delivered.

What is clear to CPRENY is that affordable housing delivery should be maximised where any opportunities arise.

CPRENY are supportive of the preferred approach in relation to size, type and distribution of affordable homes in mixed market led developments.

CPRENY also support the initiative to repurpose vacant buildings and welcomes the use of VBC in this respect.

Question 47

Do you agree with the preferred approach to Rural Exception Sites?

(please select one answer)

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY supports this considered approach to the provision of rural housing exception sites. Particularly point 1 which ensures the delivery of suitably affordable homes in the most rural of locations where such developments are more likely to be needed.

Question 48

Do you agree with the preferred approach to Rural Workers Dwellings? *(please select one answer)*

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

This is compliant with national policy. CPRENY do not wish to see isolated dwellings in the open countryside, however, recognise the importance of farm workers (in particular) being able to respond at a moments notice dependent upon the weather or specific need therefore this need often justifies being located on the main enterprise which is why traditionally farmsteads were located together around a stack yard comprising farm house and agricultural workers cottages etc. Modern practices can allow workers to be located away from the main stackyard and reliant on phone or video cameras but dependent on size and type of the enterprise this is not always the ideal scenario. This should be taken into consideration by planners on a case-by-case basis to ensure the sustained management of existing agricultural practices.

Question 49

Do you agree with the preferred approach to Self and Custom Build Housing? *(please select one answer)*

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 50

Do you agree with the preferred approach to Older Persons and Specialist Housing? *(please select one answer)*

Yes☒ No☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 51

Do you agree with the preferred approach to Householder Applications? *(please select one answer)*

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 52

Do you agree with the preferred approach to Residential Annexes?

(please select one answer)

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 53

Do you agree with the following preferred approaches to:

(please select one answer for each question)

CPRENY supports the approach for conversions in both respects

	Yes	No
Conversions for new housing?	<input type="radio"/>	<input type="radio"/>
The additional criteria proposed for the conversion of existing buildings to dwellings beyond the Development limits?	<input type="radio"/>	<input type="radio"/>

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY supports the inclusion of reference to the conservation/re-use of heritage assets within this policy as it is in line with national guidance. The additional criteria proposed for conversion beyond development limits, or the main built form of a settlement, is also welcomed and considered to be an effective means to protect the landscape and character of the countryside.

Question 54

Do you agree with the preferred approach to Replacement Dwellings? *(please select one answer)*

Yes**x**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 55

Do you agree with the following preferred approaches to Gypsies and Travellers:

(please select one answer for each question) **Yes to both**

Yes No

The allocation of Land at Hillcrest, Old Great North Road, Newthorpe (NTHP-A) for 12 pitches?

☐ ☐

The criteria for considering applications for pitches on non-allocated sites?

☐ ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 55 ctd.

Are there any sites which you consider suitable for Gypsy and Traveller use, including the expansion of existing established sites?

Question 56

Do you agree with the preferred approach to the Provision of Open Spaces? *(please select one answer)*

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY supports this approach which will facilitate the provision of recreation open space throughout the district where the council considers it to be most appropriate.

Question 57

Do you agree with the following proposed policy approaches to the protection of:
(please select one answer for each question) **Yes to all 3**

	Yes	No
Local Green Space?	<input type="radio"/>	<input type="radio"/>
Recreation Open Space?	<input type="radio"/>	<input type="radio"/>
Local Amenity Space?	<input type="radio"/>	<input type="radio"/>

If not, please give the reason for your answer and explain how you would like to see it changed.

The NPPF clearly states that policies for managing development within a Local Green Space should be consistent with those for Green Belt. As such, it is pleasing to see that the Council have made use of the VSC test in section A of the preferred Policy NE1.

Question 58

Do you agree with the preferred approach to the protection of Blue & Green Infrastructure?

(please select one answer)

Yes **X** ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY realises the role that GBI plays in achieving healthy, inclusive and safe places which enable healthy lifestyles and well-being for residents, i.e. through the provision of safe and accessible green infrastructure and encourages walking and cycling. Protecting the loss of and enhancing the amount of connectivity of GBI within urban and rural environments will provide benefits to communities as well as benefit working environments. It can also contribute to net gains for biodiversity and mitigate the impacts of climate change. CPRENY are fully supportive of the Council's approach to protect and enhance the District's GBI and believe it would deliver huge benefits to the area.

Question 59

Do you agree with the preferred approach to the Protection & Enhancement of Landscape Character?

(please select one answer)

Yes**x**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY support the preferred approach to this policy which is in line with national planning policy. The recognition of the landscape as having its own intrinsic value is welcomed, often the ordinary rural landscapes valued by so many can be overlooked for those of national or local designation.

It is considered for ease of reference, as stated in the answer to question 5 and 60 of this response, the LILA's identified within the policy, should be listed as four distinct areas for ease of reference to the Local Landscape Designation Review, especially given the draft policy NE3 points developers to the recommendations in the Review.

Question 60

Do you support the identification of Locally Important Landscape Areas at:

(please select one answer for each question) **Yes to all**

	Yes	No
Magnesian Limestone Ridge? This should be 2 areas	<input type="radio"/>	<input type="radio"/>
Hambleton Hough and Brayton Barff (combined)?	<input type="radio"/>	<input type="radio"/>
Derwent Valley	<input type="radio"/>	<input type="radio"/>

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY fully support the identification of Locally Important Landscape Areas within the Local Plan.

As set out in the answer to question 5 it is noted that the Review of Local Landscape Designation document sets out the candidate areas as 4 distinct areas and separates the Northern and Southern Magnesian Limestone Ridge. Given the distinct 'gap' between the two areas, whilst properties may be similar, CPRENY believe that for ease of reference and to support the evidence presented in the Review the Local Plan should also refer to 4 areas and differentiate between the two sites.

Question 61

Do you agree with the preferred approach to Protecting Designated Sites and Species? *(please select one answer)*

Yes ☒ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY are supportive of this policy in general terms as compliant with national policy, however, it is felt it could benefit from strengthening at D4 to read 'if the relevant criteria cannot be achieved, as a last resort, compensated for.

A final sentence should be further added below the points to state 'If these criteria cannot be met to the satisfaction of the Planning Authority then planning permission will be refused'.

It is felt that both of these additions better reflect and provide the clarity given by para 175(a) of the NPPF.

Question 62

Do you agree with the preferred approach to Biodiversity Net Gain for Ecological Networks?

(please select one answer)

Yes ☒ ☐ No

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY welcomes the recognition by the local planning authority of its duty to conserve and enhance biodiversity.

It is considered that the Council should amend the wording of draft Policy NE5 to better reflect the NPPF and the forthcoming Environment Bill to read 'by supporting proposals that deliver a minimum of 10% measurable net gain in biodiversity for ecological networks.' It is hoped that the Environment Bill will assume a more ambitious target than 10% in which case, the Council would need to update this target accordingly. Alternatively, the Council could set out their ambitions at this stage and opt for a target (for example 20%) which would go towards enabling their vision of becoming net zero much sooner.

Question 63

Do you agree with the preferred approach to Trees and Woodland?

(please select one answer)

Yes**x**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY is entirely supportive of this policy and recognition afforded to trees. However, CPRENY would like to see this policy strengthened by the addition of ancient hedgerows alongside the reference to ancient trees etc.

Question 64

Do you agree with the following preferred approaches to: .

(please select one answer for each question) **Yes to all**

	Yes	No
Development within, on top of, adjacent, or near to waterways?	<input type="radio"/>	<input type="radio"/>
Proposals affecting the Lower Derwent Valley Area of Restraint?	<input type="radio"/>	<input type="radio"/>
Proposals within or adjacent to defined Development Limits of Barlby Bridge and the Selby Urban Area	<input type="radio"/>	<input type="radio"/>

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 65

Do you agree with the preferred approach to Air Quality?

(please select one answer)

Yes**X**..... ☐ No ☐

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 66

Do you agree with the preferred approach to Pollution and Contamination? *(please select one answer)*

Yes☒..... ☐ No

If not, please give the reason for your answer and explain how you would like to see it changed.

Question 67

Which site do you think is the most suitable for a new settlement? Please rank them in order of preference. **The boxes are uneditable!**

- ☐ 1. Former Burn Airfield, Burn (BURN-G) **2**
- ☐ 2. Land at Church Fenton Airbase (CFAB-A) **1**
- ☐ 3. Land to the south of Escrick Road, Stillingfleet (STIL-D) **3**

CPRENY recognise the constraints to development within the Selby District as set out in this response and welcome the retention of Green Belt and SCGs in particular. As such the Council has to plan to deliver the districts housing need in other locations. CPRENY is supportive of the spatial strategy and settlement hierarchy. However, it is acknowledged that there is still a significant number of houses to deliver over the plan period to meeting housing need and expected growth.

The idea of garden villages was first proposed by Ebenezer Howard in the late 19th century. His vision was for communities comprising of 30,000 people on a site of around 400 hectares, allowing for a good range of public services to be supported and also ensure that no home needed to be further than 500 metres from the town centre. Ultimately, garden cities would be sustainable, walkable communities that used land well. Those that have been developed of late, are too often low density and far from town centres and rail stations. They also lack public services provision, their streets are designed for car use, and funding for public transport, walking and cycling are missing. However, the Transport for New Homes report *Garden Villages and Garden Towns: Visions and Reality* has highlighted how far we still are from the vision of sustainable communities dreamt of by Howard. From investigating 20 garden community schemes, they found '*an enormous gap between the garden community visions presented by the government, consultants and local councils, and the developments likely to be built in reality*'.

Well-designed development will be crucial in ensuring the quality of life for the people living in new homes, as well as protecting green spaces and the environment. With nearly two-thirds of us thinking that protecting and enhancing green spaces should be a higher priority after lockdown, it's clear local communities must be empowered and standards raised for new developments. Only that will lead to a new generation of low-carbon, well-connected, genuinely affordable homes suitable for the 21st century that the term 'garden town' implies.

NPPF para 72 supports the notion of new settlements provided they are well located and designed and supported by necessary infrastructure and facilities. It also sets criteria which policy makers should pay regard to when planning for any new settlement. The TCPA supports the development of Garden Villages if holistically planned and enhances the natural environment and offers high-quality affordable housing and locally accessible work opportunities in 'beautiful, healthy and sociable communities.'

Having considered the 3 options CPRENY believe a well-planned settlement which benefits from a landscape-led masterplan could deliver a high-quality sustainable settlement preventing the urban sprawl of existing settlements and release of Green Belt in the district. As such the rankings above have been given.

The most appropriate place for development has to be at Church Fenton. The site is largely brownfield land which is wholly appropriate with a brownfield first policy in order to protect greenfield land from development. It benefits from access to the East Coast Mainline from two existing railway stations providing services to Leeds and York and beyond. There are already in existence neighbouring employment uses and the site is within the same ownership which will offer opportunities both now and in the future to enable pedestrian/cycle linkages to nearby areas and Ulleskelf Station, promoting realistic and sustainable alternatives to the private car. **Continued..**

Continued...

Further and in line with provision in the NPPF, CPRENY believe that there would be opportunity to create new Green Belt land around the new garden village to protect it from urban sprawl following completion of the development.

Option 2 is considered to be the Former Burn Airfield although CPRENY would not be in favour of either this or the Stillingfleet site (option 3) being developed at all.

The Former Burn Airfield is located in Flood Zone 3 (although benefits from formal flood defenses) and is currently agricultural land – 80% of which is considered to be Grade 2 in the Best and Most Versatile Land Classification Schedule. The NPPF explicitly directs development away from Flood Zone 3 and to protect the best and most versatile agricultural land for development. The loss of 200Ha of this land is therefore considered unacceptable and not consistent with policy. Whilst there are flood defense on site, these have been created to protect the existing development and former airbase from flooding and not the level of development proposed. CPRENY would expect that the amount of development that would be delivered would have an impact on these defenses which would require upgrading. It is acknowledged there are some existing connections to existing communities and the site is located close to the strategic road network which in combination ranked this as option 2, however, there are no available opportunities for alternatives to the private car at this location.

The land to the south of Escrick Road at Stillingfleet has been ranked as option 3 by CPRENY who are not in favour of its development at all. The site is constrained by large swathes of Ancient Woodland, which whilst could be incorporated into a masterplan would certainly be impacted by 3000 dwellings and infrastructure required in the area and access afforded to it by new communities. The only positive opportunity from CPRENY perspective is that the site is in flood zone 1. The existence of the Trans Pennine Cycle Route through the centre of the site whilst linking the new settlement to York and Selby could actually prove unpopular if cojoined with vehicular access routes and would need to be master planned carefully by people who appreciate cycling rather than just provision of cycle lanes. The site is at some distance to existing train station or strategic road networks and is entirely greenfield development. In our opinion, this site should not be considered at all.

CPRENY have been particularly impressed with the landscape-led master-planning of a development in Middlesbrough which promotes 'country park living' and offers residences within a tree-lined and biodiversity rich development including service centre and new primary school with open space provided throughout the development and multiple cycleways and pedestrian links. Whilst objecting to the loss of openness and the development of one of Middlesbrough's last remaining open spaces, the principle behind the development are impressive and policy compliant. CPRENY would therefore this level of approach to any development brief going forward to ensure that this garden village does not fail in its opportunity to promote an attractive and sustainable way of living in a climate-aware and health and well-being conscious settlement.

<https://www.middlesbrough.gov.uk/sites/default/files/Stainsby-masterplan-Feb21.pdf>

Question 68

Are the assessments questions in the SAM appropriate? Would you include any other assessment questions?

The SAM is appropriate for use and CPRENY support the methodology contained within it

Question 69

Is the assessment of the sites accurate? Please use the site reference when answering

CPRENY have not been made aware of any inaccuracies by members

Question 70

Do you support the preferred approach to the delivery of the homes needed in Tadcaster, based around a comprehensive heritage-led regeneration approach? Please explain your reasons for this. If not, please give the reason for your answer and explain how you would like to see it changed.

CPRENY supports the heritage-led regeneration scheme for Tadcaster providing a mix of sites in the town and facilities bringing back into use a number of vacant buildings and sites which will have significant positive benefits for the area and its immediate surroundings. CPRENY supports the Council's decision not to allocate 3 sites within Green Belt but favour those sites within and immediately adjacent to the town centre as there are sufficient suitable available and deliverable sites outside of the Green Belt.

Question 71

Please indicate whether you support or object to the preferred approach for replacement parking at each of the following suggested locations:

(please select one answer for each question)

	Support	Object
TADC-N	<input type="radio"/>	<input type="radio"/>
TADC-I	<input type="radio"/>	<input type="radio"/>
TADC-V	<input type="radio"/>	<input type="radio"/>
TADC-M	<input type="radio"/>	<input type="radio"/>

Please give the reason for your answers.

No comment

Question 71 ctd.

Please let us know if there are any other locations or solutions for replacement parking to serve the town's needs? Please include a plan if you would like to put forward a particular site.

No comment

Question 72

Do you consider any of the sites below to be suitable alternative sites for allocation? If yes please specify the site reference number and your reasons for this.

No comment

Question 73

**Do you agree with the preferred approach to the monitoring of the policies in the plan?
If not please give the reason for your answer and explain how you would like it changed.**

CPRENY support the preferred approach to monitoring of policies within the Local Plan.

Sites Question

Which site(s) are you referring to

Do you support the proposed allocation for development?

(please select one answer)

Yes ☐ No ☐

If not, please explain your reasons and explain how you would like to see it changed.