

Carter Jonas

Regent House
13-15 Albert Street
Harrogate HG1 1JX
T: 01423 523423
F: 01423 521373

PLAN SELBY SUMMER 2015 ISSUES AND OPTIONS CONSULTATION

On behalf of The Grimston Park Estate

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Quality Management

Prepared by:	Carter Jonas LLP
Authorised by:	Paul Leeming
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1 INTRODUCTION

1.1 Carter Jonas LLP is instructed by the Grimston Park Estate to submit representations to the current Plan Selby Consultation which ends on close of play Monday 10th August.

1.2 The Council has requested feedback on the following documents:

- Draft Strategic Housing Market Assessment
- Draft Stage 1: Green Belt Study
- Draft Strategic Countryside Gap Study
- Draft Method Statements for:
 - Identifying Development Limits
 - Identifying Safeguarded Land
 - Determining the Status of Villages in the Green Belt
 - Site Allocations: A Framework for Site Selection.
- Draft Growth Options for Designated Service Villages
- Market Towns Study (Sherburn in Elmet, Selby and Tadcaster): Draft Part A: Evidence Baseline Review, including town fact sheets.
- Highways Assessment: Draft Part A Baseline Position

1.3 Set out over the following pages is our response to the matters raised in so far as they relate to the Estate's land and property portfolio in the northern part of the District. Land has been put forward by the Estate to the north of Tadcaster at Kelcbar for residential development. An open dialogue is proposed with the Council in respect of exploring the development potential of parts of the Estate at Tadcaster around Willow Farm and Grimston Grange for employment purposes. Elsewhere land is put forward for residential development around Ulleskelf at Barleyhorn Road, and West Farm.

1.4 An application has been submitted at West Farm for residential development to facilitate rationalisation and consolidation of that farmholding. The Estate is also willing to explore the expansion of community sports and leisure facilities at Ulleskelf where this contributes to the sustainability, health and well-being of the existing community and future residents.

1.5 This statement sets out the Estate's response to the current consultation and should be read in conjunction with previous comments and on-going engagement on the future regeneration of Tadcaster. Towards the end we also include a brief comment about omissions from the Consultation.

2 DRAFT STRATEGIC HOUSING MARKET ASSESSMENT (SHMA)

Q1 (SHMA) Do you have any comments on the:

a. housing market areas in and around Selby?

- 2.1 A number of methodologies suggest a complicated array of indicators to establish the housing market areas across the District. All of them demonstrate a degree of interdependence with surrounding Districts, for employment social and retail facilities. Consideration also needs to be given to connectivity and access by car, rail and bus, and where physical barriers such as the River Wharfe may affect a functional housing market area.
- 2.2 It is clear that the northern part of the District around Tadcaster and Ulleskelf draws its influence towards York in the east, Leeds to the west and Harrogate/Wetherby to the northwest.
- 2.3 There does need to be a recognition in Tadcaster in particular that the lack of recent development will have skewed the housing market

b. trend based demographic projections?

c. economic led projections?

- 2.4 Trend based projections are the starting point for establishing Objectively Assessed Needs and these need to be adjusted to take into consideration the economic priorities and policies of the District and community. Ultimately the Council should be seeking to provide a decent home to all members of the community in places where they want to live.
- 2.5 What is notable is that for the last six years housing completions have been substantially below the housing requirement set out in the Core Strategy and previously the Local Plan. This can in part be explained by the economic downturn but is also explained by the Council's operation of a constrained supply policy. Since that approach was removed it will be interesting to see how housing completions (i.e. delivery has improved).

d. affordable housing need?

- 2.6 A key consideration suggests that the level of housing need remains largely unchanged since the 2009 SHMA. The report goes on to suggest therefore that this supports maintaining the current affordable housing threshold at 40% on qualifying sites. Delivery of affordable housing is a key consideration but must be balanced against the need to ensure development remains viable, hence a blanket approach is not advisable and the Council must continue an approach which deals with each

case on its merits and uses a degree of discretion. Where development becomes unviable, no affordable housing will be delivered.

e. market signals?

- 2.7 Ultimately that private sector housebuilders are, and will remain for the foreseeable future, the singular most important source of affordable housing provision. Broadly the more market homes that are built the greater the provision of homes within the affordable housing tenures. Likewise an increase in the supply of market housing should address broader affordability in the market sector.
- 2.8 The Estate has put forward land for housing in Tadcaster capable of delivering much of the requirement for the town over the Core Strategy period. The Estate is in talks with a development partner to bring the land forward through the planning process.
- 2.9 In bringing the land forward the Estate has been approached by numerous regional and national housebuilders interested in building new homes in Tadcaster. This demonstrates a clear demand for new homes to be built in the town.

f. need for different types and sizes of homes?

- 2.10 Details in the SHMA suggest a number of indicators driving demand for different types of homes be they four bedroomed detached through to one and two bed flats or specialist housing. Such drivers include household formation, market demand and individual needs as well as policy drivers.
- 2.11 It is important to note that the SHMA is relevant at the time of publication but may be quickly out of date. As a consequence it is not appropriate to use the housing mix as a prescriptive policy, but more as a guide.
- 2.12 It is important for the Local Plan to ensure that a wide variety of sites are available in numerous locations to enable the housing and development sector to deliver homes across the District

g. housing needs for specific groups of the population?

- 2.13 It is important that the Local Plan recognises the needs of different parts of the community and that their different housing needs are met. From the SHMA the main driver of specialist housing will be the requirement to accommodate the needs of an aging population.

h. draft conclusions?

- 2.14 It is considered that the draft SHMA provides a useful evidence base to assist the Council in preparing the further documents of the Local Plan.

3 DRAFT EMPLOYMENT LAND REVIEW

Q2 (ELR) Do you have any comments on the:

a. analysis of the economy and commercial markets?

- 3.1 Introductory sections of the ELR demonstrate the effects of the recent recessionary pressures upon the Selby economy, economic growth and employment rates.
- 3.2 A review of the commercial markets demonstrates the dominance of Sherburn and Selby supplemented by a variety of free standing business parks across the District. Limited analysis is provided of Tadcaster.
- 3.3 Usefully a review has been prepared of the activities of adjacent authorities, in particular Leeds, York and Harrogate which provide the main pull for Tadcaster.

b. functional economic areas identified?

- 3.4 There is agreement with the functional economic areas set out in the ELR.

c. availability of the sites set out in Figure 1.3 of the Executive Summary (Figure 3.4 of the main report)? (See note after Q2 (ELR) d)

- 3.5 The availability of sites as set out in the Figure 3.4 reflects our own understanding of the availability of sites around Tadcaster.
- 3.6 In the previous consultation the Estate did suggest and offer the availability of land and premises as future employment locations at Willow Farm on the edge of Tadcaster, and at Grimston Grange to the east of the A162, to the south of the town.

d. conclusions, and the basis for the conclusions, on the allocation/de-allocation of the sites set out in Figure 1.3 of the Executive (Figure 3.4 of the main report)? (Appendices 1, 2, 3a and 3b of the ELR main report set out all the sites which were assessed as part of the study, The conclusions are based on a high level assessment of supply and makes recommendations in terms of which sites should be carried forward taking into account the balancing of predicted demand and supply of employment land)

- 3.7 Para 5.44 suggests that the PLAN Selby requires the identification of further sites in Tadcaster and DSV's along with a flexible, positive stance to rural economic development . As noted above the Estate has put forward land on the edge of in Tadcaster considered appropriate for accommodating employment uses.

e. other conclusions/findings of the study.

- 3.8 Estate land has been put forward for development at Ulleskelf. The ELR has reviewed a couple of sites but not the Estate's land. This may be appropriate to consider for employment uses.

4 DRAFT STAGE 1: GREEN BELT STUDY

Q3 (GB) Using the information within Table 8 of this study, do you have any comments on the approach by which General Areas could be defined as 'weakly' or 'more strongly' fulfilling the five national purposes of the Green Belt (as defined within NPPF Paragraph 80)?

- 4.1 Having reviewed the Green Belt Study, it is helpful that the primary purpose of the West Yorkshire Green Belt is defined as "to restrict the sprawl of the West Yorkshire Conurbations into the open countryside". It also explains how the Green Belt was extended to the north and west of Tadcaster.
- 4.2 Our overarching comment relates to the extent of the broad areas selected in terms of reviewing the function of the Green Belt. Whilst acknowledging the strategic nature of the Green Belt Review, the reality is that most of the Green Belt will remain and only small areas of the Green Belt will be reviewed on or around selected settlements to accommodate development in accordance with the spatial strategy set out in the Local Plan Core Strategy..
- 4.3 Grimston Park Estate has put forward land to the north and west of Tadcaster either side of the A659 Wetherby Road suggesting that it should be removed from the Green Belt and put forward as a major housing site to assist in the future growth of the town. That land adjoins the urban area and previous representations to the Council suggested amendments to the Green Belt boundary reflecting the availability of the land for development and prevailing guidance for defining the revised boundaries in terms of permanence and following recognisable and physical features.
- 4.4 The Study Areas are relatively broad brush with the Estate's land at Kelcbar split between areas Tadcaster 2 and Tadcaster 3. Considering the information at Table 8 our view is that the Green Belt Study should be a more fine grained analysis at this stage.

Q4 (GB) Do you have any comments on the approach to defining purpose 5 of the Green Belt Review?

- 4.5 The approach outlined at Section 5.5 suggests that there are specific local circumstances (in terms of land supply) at Tadcaster and regeneration priorities which outweigh the protection of the Green Belt.
- 4.6 It is considered that the removal of the Estate land at Kelcbar from the Green Belt will support the Council and the community's regeneration priorities for Tadcaster..

5 DRAFT STRATEGIC COUNTRYSIDE GAP STUDY

Q5 (SCG): Do you have any comments on the:

a. principle of defining Strategic Countryside Gaps in PLAN Selby?

5.1 As a point of principle the Estate would question the need for providing such designations.

b. methodology used to assess potential Strategic Countryside Gaps?

5.2 See above.

c. assessment of each potential SCG?

5.3 Part of the Estate's holding to the south of Tadcaster to the west of the River Wharfe and north of the A64 is suggested as part of an SCG. Given that the area is in a Flood Zone which would preclude many types of development and there is no direct access into this area we consider that an SCG designation is superfluous and unnecessary.

6 DRAFT METHOD STATEMENT DEVELOPMENT LIMITS

Q6 (DL) Do you have any comments on:

a. the need to identify development limits in PLAN Selby?

6.1 It is necessary to define settlement limits to provide certainty in the planning process to distinguish where development is to be encouraged and where not.

b. an alternative policy approach to protect the countryside?

6.2 No comment.

c. the proposed methodology for defining development limits?

6.3 A consistent approach is recommended.

d. the conclusions about defining 'tight' development limits?

6.4 It is considered that overly rigid development limits are not appropriate where these would conflict with sustainable patterns of development and achieving good/sympathetic design.

7 IDENTIFYING SAFEGUARDED LAND

Q7 (SL): Do you have any comments on the proposed approach to identifying safeguarded land set out in section 3 of the study?

- 7.1 There is a recognised need in Tadcaster to review the Green Belt boundary, principally based upon the issue of land availability. Land promoted by the Grimston Park Estate to the north of the town is put forward to satisfy the housing requirement for the town as set out in the Core Strategy, in addition to any brownfield sites in the town (centre) which may come forward.
- 7.2 There may be a case for reviewing the status of some allocated housing sites such as at Station Road which have not come forward and those reverting to the Green Belt or to become “safeguarded” to come forward beyond the Plan period.

8 DETERMINING THE STATUS OF VILLAGES IN THE GREEN BELT

Q8 (VGB): Do you have any comments on the proposed approach to determining the status of villages in the Green Belt set out in section 3 of the study?

- 8.1 No comment.

9 SITE ALLOCATIONS: SITE SELECTION FRAMEWORK

Q9 (SS): Do you have any comments on:

a. The overall approach to the site selection process set out in section 6.3 of the study?

- 9.1 It is considered that the overall approach set out in Section 6.3 of the Study should allow a consistent and systematic appraisal of sites.

b. The details of the site assessment work proposed in Appendix A of the study?

- 9.2 As above.

10 DRAFT GROWTH OPTIONS FOR DESIGNATED SERVICE VILLAGES

Q10 (DSV): Appendix B of the study provides a Settlement Profile for each Designated Service Village, including environmental and heritage designations. Is there any information that is incorrect or missing from these Settlement Profiles summaries? (Please note, we are in the process of updating evidence such as flood risk, accessibility, landscape and green infrastructure)

- 10.1 Estate land at Ulleskelf is put forward for development at West Farm and Barleyhorn Road. A planning application for up to 30 dwellings was recently submitted for the site at West Farm.

10.2 It is considered that the Environment Agency flood risk mapping at Ulleskelf is inaccurate (Figure 3 at Section B18.3). Selby Council has confirmed in correspondence that following topographic survey that land at West Farm currently the subject of the planning application falls within Flood Zone 1. It is also worth noting that the Environment Agency has recently performed remediation works to the flood defence works at West End to bring them up to their design standard.

10.3 Land at Ulleskelf 3 does not reflect the most recent submission to the Council's Call for Sites.

Q11 (DSV): If you had the choice, let us know which option for growth of the Designated Service Villages you would choose?

10.4 Grimston Park Estate considers it important to ensure that the DSV's in the District continue to perform roles serving the surrounding rural areas. Therefore it is important that the facilities and services within these settlements continue to remain viable and proposer. Indeed the Estate considers that development should be focused into such settlements to ensure that eh

Q12 (DSV): Are there any better ways/options of determining how many new dwellings should be built in each of the Designated Service Villages up to 2027

10.5 The Estate has put forward land in Ulleskelf, namely Ulleskelf 3 (as amended) and Ulleskelf 4 capable of delivering about 100 houses. It would be appropriate for the Council to allocate both sites.

Q13 (DSV): What areas of open land in and around your village do you think are especially valuable and tell us why you think so?

10.6 No comment

Q14 (DSV): What parts of the built up area of your village do you think are especially valuable and tell us why you think so? (please describe as clearly as possible where these areas are and their extent. If possible submit a map or photographs showing the areas you have picked out).

10.7 No comment.

11 MARKET TOWNS STUDY: PART A: EVIDENCE BASELINE REVIEW

Q15 (MTS): Is there any relevant evidence base missing from the baseline review and factsheets and is there anything incorrect about our summaries of the evidence?

11.1 Carter Jonas and the owners of the Grimston Park Estate attended a number of community and technical group consultation meetings with members of the community and other groups as well as representatives of other landowners. Comments and contributions regarding the evidence base and a baseline review were given a those sessions.

Q16 (MTS) Sherburn in Elmet

11.2 We have no comments at this stage

Q17 (MTS) Selby

11.3 We have no comments at this stage

Q18 (MTS) Tadcaster do you have any comments on

a. the 'deficits, needs and aspirations'?

11.4 There is a clear requirement for Tadcaster town centre to serve the needs of residents of the town and the surrounding rural area, including neighbouring parts of Leeds and Harrogate.

b. the technical issues?

11.5 No comment.

c. The options and key planning issues?

11.6 Grimston Park Estate supports the proposals to regenerate the town and town centre and proposes the release of land to the north of the town either side of the A659 at Kelcbar from the Green Belt and its development for a mix of housing.

d. what areas of open land, in and around the town, do you think are especially valuable and tell us why you think so?

11.7 Land adjoining the River Wharfe to the north and south of the town centre within the Estate's ownership provides an attractive setting for the town. It is considered that such land provides opportunities for tourism and leisure.

e. what parts of the town's built up area do you think are especially valuable and tell us why you think so?

11.8 Much of the town centre is designated as a Conservation Area recognising its historic character and attractiveness.

12 HIGHWAYS ASSESSMENT PART A BASELINE POSITION

Q19 (HA): Do you have any comments on the highway assessment

12.1 No. The Assessment appears to consider the major junctions in the District. .

Q20 (HA): Are there any other junctions that should be assessed in addition to those identified in this study?

12.2 No comment at this stage.

13 OMISSIONS

13.1 What would seem to be a major omission from the present consultation is any reference to the Duty to Cooperate with regard to activity and aspirations in adjoining Districts, statutory providers and other partner organisations in the plan making process.

13.2 This matter is raised as a general consideration but is also one raised in terms of concerns about consistency with adjoining District's and any methodologies where adjoining authorities are undertaking Green Belt Reviews etc. A consistent approach is required.

13.3 On a further matter given the Estate's expressed interests in the northern part of the District and in particular the growth and regeneration of Tadcaster and its Town Centre it is important to consider the potential effects of the proposals within the Leeds City Council administrative area for a "New Settlement" at Headley Hall. On the face of it we would take the view that the proposals may divert/dilute development and investment away from Tadcaster which is a central tenet of the Core Strategy.

13.4 Proposals for the New Settlement are progressing through the Leeds Site Allocations process which will be published for public consultation in the Autumn. In our view the proposals are not consistent with the Leeds Core Strategy and with respect to the current consultation would directly conflict with the Selby Core Strategy. There is limited reference to the Headley Hall proposals and in particular the potential requirement to deliver some 800 units on part of the site which falls within Selby District.

13.5 In order to deliver the New Settlement additional and upgraded infrastructure in the form of a new junction off the A64 may be required. Other infrastructure and utilities may need to be provided within Selby District,

