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Dear Sirs

PLAN SELBY SITES AND POLICIES INITIAL CONSULTATION

Carter Jonas LLP is instructed as agent to the Grimston Park Estate to submit representations at appropriate stages of the Local Plan process. The opportunity to contribute to the progress of the Sites and Policies (SAPP) document is welcomed by the Estate, both as a major land /property owner and employer but also as residents of the District.

Grimston Park Estate has been involved in previous stages of the now adopted Core Strategy and the previous incarnation of the Allocations document. Those representations have consistently sought to support the growth of the District and to ensure that the Estate's current and future interests are protected and promoted. The Estate itself comprises a number of substantial heritage assets and landscapes; the Estate's owners seek to ensure that these assets are maintained for current and future generations.

In particular the Estate is supportive of efforts by the District Council and others to regenerate Tadcaster (one of the District's two Local Service Centres) and has put forward part of its land holding on the northern edge of Tadcaster to support additional housing, including local needs and specialist provision, along with the potential for a major riverside park along the banks of the River Wharfe. The land is available and deliverable.

Elsewhere the Estate has put forward land in the village of Ulleskelf, a Designated Service Village, with a view to maintaining and sustaining the viability of the community and supporting the provision of community, sport and play facilities within the Estate's land holdings. Ulleskelf is one of the few villages within the District with direct rail access and services to the major cities of York and Leeds. It is important that such services are maintained and that additional patronage is achieved.

Given the wider landholding the Estate is keen to ensure that the allocations and development management aspects of the SAPP provide sufficient opportunities to maintain, support and promote a prosperous and vibrant rural economy, ensuring that flexibility is retained to allow for the appropriate re-use of rural buildings where these can generate employment opportunities or much needed homes.

The following sets out a response to the relevant sections of the SAPP and other matters which are the subject of the present consultation.

Q1 Please refer to the Sustainability Appraisal report: Please let us have your comments on the objectives and approach.

It is important that the plan preparation process is informed by a comprehensive Sustainability Appraisal from the outset. At this stage however, it is too early to comment in detail upon the objectives and approach until specific site allocations and strategies for the individual settlements have emerged.

In broad terms the SA sets out a picture of a rural District with a number of particular issues to be addressed. The SA includes a Review of relevant and emerging policy. It is important that the SA refers to the most recent guidance available, and we would suggest that the list in Appendix A and subsequent sections is reviewed regularly. It should make reference to the 2014 Planning Practice (not Policy) Guidance.

It is noted that element of the evidence base are also being updated and we would suggest for example that the most recent evidence should be used. It is noted for example that the mapping presented for several villages in relation to flood risk, an important issue for many parts of the District, have been superseded by more recent and accurate mapping from the Environment Agency.

Q2 Please refer to the Habitat Regulations Assessment report: Do you have any comments on the screening methodology?

At this stage we have no comments upon this document.

Q3 Please refer to the Duty to Cooperate Statement and let us have your comments.

It is important that the Council undertakes a prudent and comprehensive approach to the cross border issues. As set out the DTC document provides an appropriate starting point to this process.

In terms of the Estate's concerns it is important that the Council engages positively with Leeds City Council which is in the initial stages of its allocations process. Currently the City Council's draft allocations process is suggesting a new settlement at Bramham Moor/Headley Hall, this apparently includes several hundred houses on the Selby side of the border. It is important that this does not conflict with or undermine the Core Strategy elements for the regeneration and future growth of Tadcaster.

Q4 Please refer to the SAPP Engagement Plan and let us have your comments on the planned approach to ensuring PLAN Selby is positively prepared.

It is important that the Council has a clear and methodical approach to engaging with those communities, organisations, businesses and individuals who may be affected by the proposed policies and allocations in the emerging document. SAPP.

The Estate and Carter Jonas as agent welcomes the opportunity for positive dialogue with the Council and other partners in the plan making process, in particular those parts which affect the Estate's interests, and where the Estate can contribute usefully and effectively.

Key Aims and Objectives of PLAN Selby

Q5 a) Are these the right objectives? And b) Are there any others which should be included?

It is important that the preparation of the SAPP is informed by some overarching objectives and these should strike sufficient balance between guiding and encouraging (sustainable) development, protecting valued cultural, heritage and community assets; whilst not being too prescriptive or burdensome that their cumulative effect constrains the delivery of sustainable development, in particular much needed homes and jobs.

An approach which seeks to avoid too much detail and unnecessary policies is to be welcomed, particularly where this avoids duplication of other guidance. There is a danger where policies which are too prescriptive and specific may simply become out of date.

In terms of elements which should be included would be an approach which encourages high quality development and good design; as these are considered to be a key aspect of sustainable development.

Key Issues and Topics

Q6 a) Are these the right topics?

Some six topics are set out which will form the basis of the Plan; these appear to broadly cover the main aspects and should be seen as interlinked rather than in isolation.

b) Is this a comprehensive list?

No comments at this stage.

c) Which ones are most important and which ones are less relevant?

No comments at this stage.

T1 Providing Homes

Q7 a) Do you agree with the proposed approach to the base date?

One of the key elements of the plan making process is to provide clarity and certainty. Therefore the use of a base date as a fixed point in time is an appropriate consideration. It is noted that the figures currently presented are from 2014.

b) Do you agree with the broad principles of the calculation method?

Broadly the method set out in Table 2 reflects a general residual model and appears broadly reliable. It appears that inclusion to the 2015 updates may have a substantial effect upon the need to identify further sites in Sherburn in Elmet.

What may be concerning is the number of outstanding planning permissions which may not be built. Paragraph 3.14 suggests that some 1,260 units have planning permission. It was apparent at a SLAA working group that a number of planning permissions comprised of high density development schemes of flats which are unlikely to be built in the current market. Therefore a degree of caution is advocated.

Q8 a) Should PLAN Selby over-allocate to allow for any non-delivery on the allocations? By what method and by how much?

In answering this question, the Council should take a view to ensure that there are enough sites identified across the District to ensure that the housing requirement can be met. There are two distinct parts to the Core Strategy requirement; a part which requires the identification of sites for up to 450 dwellings a year, and recognition that windfalls will deliver a minimum of 105 units per year. This mechanism seeks to ensure that the Council delivers a proportion from allocations and that windfalls are additional; i.e. a top up /bonus not instead of the delivery of allocations.

In our view this is not a matter which should be paraphrased as "over allocating", but that the Council should take a prudent approach and seek to utilise realistic build out rates for sites and realistic densities. For example to deliver the 450 units per year would require fifteen separate outlets (sites) delivering 30 units per year. Such discussion reflects the view of agents and housebuilders as part of the SLAA working group to ensure that the Site Allocations are realistic, rather than overly optimistic. We return to this issue in relation to the sites at Tadcaster and Ulleskelf later.

What is notable in Table 2 of the draft SAPP is that it suggests that in each of the last three years the Council has not managed to deliver Core Strategy housing target. This may be as a result of the economic circumstances but also as a consequence of a restrictive approach to land supply. Such an approach does

not assist in addressing affordability and restricting access to affordable housing acts as a brake upon economic growth and reduces labour mobility. It will be important to consider whether the figures for 2014/15 will repeat the pattern.

b) How should PLAN Selby seek to allocate sites in such a way as to secure delivery over the whole plan period?

Given the underdelivery of housing numbers as highlighted in Table 2, this would suggest that it is not necessary for the Council to seek to restrain delivery of housing through a policy mechanism which simply seeks to reduce housing delivery. There may be a requirement to phase development where infrastructure and utilities are required; however, this is a matter for the IDP and to be dealt with at the appropriate time through the development management process. It is for the Council to ensure that there are sufficient sites available across the District to deliver the housing requirement.

Where the Council is reliant upon major strategic sites to deliver components of the Core Strategy, it is important that the Council accepts realistic delivery rates for housing and ensures that there are sufficient outlets to ensure continuity of supply across the whole plan period.

c) Is there opportunity to have contingency sites in case others are not delivered elsewhere in the District? How might the contingency sites' release be managed to maintain a 5 year housing land supply?

Paragraph 47 of the Framework sets out the duty that when plan making local planning authorities must ensure a supply of deliverable sites for the first five years, plus an appropriate buffer, as well as a supply of deliverable site for years 6-10 and, where possible for years 11 – 15. It is appropriate for the Council to ensure that enough sites are available to deliver the annual housing requirement.

It is important that the Council delivers an SAPP which is "sound" and positively prepared. Should the Council need to ensure that further sites are brought forward then it is necessary to ensure that sufficient sites are allocated.

Q9 a) Is a simple percentage growth across all Designated Service Villages a fair and appropriate starting point for deciding the split between the DSVs?

A simple subdivision of the housing requirement would suggest that each DSV should accommodate a minimum of (18/1330) of 75 dwellings.

b) Bearing in mind issues such as land availability, flood risk and other technical constraints (e.g. highways capacity and access) are there particular criteria that should be taken into account in assessing the final minimum target for Designated Service Villages?

Noting our comments from earlier it is important that the Council has the most up to date evidence available; this is particularly so for flood risk mapping which affects a large proportion of the District.

It is also necessary to recognise deliverability issues such as market attractiveness and that certain parts of the District are more attractive than others given relative proximity to jobs, services and facilities, so that land is not identified in locations where housing is unlikely to be built.

Q10 The Core Strategy sets the 'rules' for choosing sites; but do you have any views on the relative importance or weight to be attached to the criteria for site selection?

Assessment of individual settlements and sites is clearly a detailed matter which will be dealt with at the next stage and the relative weight and importance will vary on a site by site basis. It is important that this is debated from an early stage.

In responding generally to this point we would refer the Council to two recent Site Allocations DPD's in Harrogate and Doncaster which were found unsound by their respective Inspectors. For Harrogate, the

Inspector's fundamental concern was the Council was using an out of date evidence base in considering the objectively assessed need for both housing and employment. As a secondary element to this was the arbitrary way in which the Council dismissed sites on the basis of protecting the District's "high quality" environment, much of it not subject to any statutory designation. In doing so the Inspector recognised that the District is subject to various Footnote 9 designations (AONB, Green Belt, SSSI) however, these were gauged by the Council in the same context (and of equal merit) as more subjective local designations. Further the Inspector raised concerns that the Council had dismissed sites on technical matters (such as highway and infrastructure capacity) which may be dealt with through modifying and upgrading infrastructure.

In Doncaster, the Inspector raised a similar set of concerns of note being where the Council selected sites which were at a higher risk of flooding over sites which may have failed on subjective accessibility criteria, but otherwise may be deliverable.

Q11 In Tadcaster, three phases are proposed. Phase 1 and the contingency phase 2 are to be in Tadcaster and will follow the site selection methodology referred to in the previous section. However, how should PLAN Selby determine where the contingency Phase 3 sites should be located?

As a major landowner with land and property interests around Tadcaster, the Grimston Park Estate is supportive of the Core Strategy framework which seeks to regenerate Tadcaster and ensure the vitality and viability of the town centre for current and future residents of the town and the hinterland it serves and to deliver the much needed market, affordable and specialist forms of housing required by the community. The Estate recognises the need to provide new homes and housing for the community to encourage mobility and address affordability issues in the town.

In doing so the Estate has put forward some 23.5 hectares (58 acres) to the north of Tadcaster town centre. These are listed in the SAPP as TADCASTER/002 and TADCASTER/003. Both of the sites are accessible and can achieve a safe pedestrian linkage into the town centre and the services and facilities within it. The Estate considers this land should be removed from the Green Belt and allocated for housing.

Both sites are available and deliverable. A series of ecological, intrusive and topographical surveys are being undertaken to assess whether there are any potential constraints and issues which may prevent the land coming forward or otherwise limit the ability of the sites to deliver the housing requirements set out in the Core Strategy. This work will also inform the extent of the site which is subject to potential flood risk so assess the extent of net developable area.

There are a number of brownfield and other sites which may contribute an element of windfall development around the town; however, evidence put to the Core Strategy Examination and to the subsequent Challenge identified that there are no other large greenfield sites available for the duration of the Core Strategy period. Site TADCASTER/ 001 may be available but is not deliverable due to difficulties achieving appropriate access over land which is constrained by third party ownerships.

Given the above situation whilst there may be concerns about the availability of certain land around Tadcaster, and the Council is pursuing a prudent approach, we do not consider it necessary to provide contingency sites and that the two sites in the town TADCASTER 002 and 003 should be allocated for housing. .

T2 Promoting Prosperity

Issues

Q15 a) What approach should be taken on the existing Established Employment Areas as defined in the Selby District Local Plan 2005?

No comment on this question at this time

b) Is there a need for a detailed policy to apply to the Established Employment Areas?

No comment on this question at this time

Q16 In the Selby District Local Plan, all Employment Allocations were considered suitable for all types of employment use (B1, B2 and B8). However in the light of the different roles of each of the towns, should PLAN Selby consider a different approach, for example being more specific about the types of employment uses on particular sites?

It is not appropriate for the Council to be too prescriptive about the employment and economic uses on individual sites.

Q17 What should the approach to employment land be in the rural areas, including the Designated Service Villages?

A prescriptive approach to employment in the DSV's would not be appropriate. It would be helpful to have a positive policy context which encourages entrepreneurs and facilitates job growth for example through supporting the conversion of existing and redundant buildings to provide the homes and jobs needed across the District.

Q18 Do we need any Development Management policies particular to the rural areas to expand on the requirements set out in Core Strategy?

A prescriptive approach to employment in the rural areas would not be appropriate. It would be helpful to have a positive policy context which encourages enterprise and facilitates job growth.

Q19 Within the rural area do we need any special policies or designations for any of the particular rural sites in the District and to support the rural economy?

No comment on this question at this time

Q20 Do you have any particular views at this stage on these issues or how each of the 3 town centres should be developed? Or specific issues for shops and services in the other settlements.

As a landowner local to Tadcaster, the Estate is supportive of proposals which contribute to maintaining and enhancing the long term vitality and viability of the town centre. It is important that proposals recognise the historic nature and local character of the town centre Conservation Area and offer a range of uses, services and facilities which will serve residents of the town and the surrounding hinterland.

Other Allocations/Designations

Q21 a) Are there any areas that should be safeguarded, allocated or designated to restrict or promote development?

There appears to be limited reference to national infrastructure projects which may affect the District over the course of the Plan period, with some commentary in the Draft IDP. Key amongst these may be the HS2 proposal which will plug-into the existing railway network between Ulleskelf and Church Fenton. In association with this are the proposals to introduce electrification to the key regional rail routes between Leeds and York, including the upgrade of rolling stock; part of the so-called HS3.

b) What is the justification for such an approach?

Such elements of transport infrastructure are of national and regional significance and currently form part of the Government's strategy for securing economic growth and should come to fruition over the lifetime of the plan.

T3 Defining Areas for Promoting Development and Protecting Key Assets

Q22 Should the Development Limits be drawn tightly to maintain the settlement pattern, or loosely around the settlements to enable sympathetic development?

In principle the Estate considers that the drawing of Development Limits around settlements is an overly restrictive and negative approach which is at best arbitrary and subjective and at worst generates some perverse decisions through the development management system. We would advocate that prescriptive development limits are not appropriate and should not be included in the SAPP.

Q23 a) Where should the boundaries of the new Strategic Countryside Gap between Selby and Thorpe Willoughby be drawn?

No comment

b) Are the boundaries of the other existing Strategic Countryside Gaps still appropriate?

No comment

Q24 How should PLAN Selby determine how much Safeguarded Land should be designated for potential future use?

Provisions within the Framework suggest that the preparation or review of a Local Plan is the appropriate forum for reviewing the extent of the Green Belt and altering its boundaries for the purposes of setting Green Belt policy and a settlement strategy of promoting sustainable patterns of growth.

In reviewing Green Belts, the Framework sets out some consideration for redefining boundaries to address objectively assessed needs during the plan period and to account for potential development requirements beyond the present plan period (i.e. safeguarding). It also sets out the consideration of setting boundaries with reference to features that are easily defined, recognisable and likely to endure.

Safeguarded land should focus upon the settlements in the hierarchy which are considered the most sustainable, for instance Tadcaster, Sherburn and the DSV's; Selby town itself is not affected by Green Belt.

As a pre-requisite it is considered that the Council should ensure that the proposed allocations involving the removal of land from the Green Belt are based upon realistic assumptions of delivery, development density and net developable areas in relation to the Core Strategy period. We discuss these later in relation to Tadcaster under the settlement specific questions. The same principles should then apply when determining the extent of safeguarded land alongside the definition of Green Belt boundaries that will endure. In doing so reference should be made to the Framework which suggests that land should not be maintained in the Green Belt if it is not necessary to do so.

T4 Infrastructure Needs

Q25 Are there any infrastructure requirements that have not been identified, including small scale and local needs?

No comment at this stage, the IDP appears to identify a range of infrastructure needs, those required to deliver sites will be assessed as the development strategy emerges.

T5 Climate Change and Renewable Energy

We would suggest that this element of the PLAN Selby should be entitled "Sustainable Construction, Energy Efficiency and Renewable Energy." It is unnecessary for the SAPP document to duplicate or repeat other regulations such as Building Regulation, merely to refer to them and ensure compliance where appropriate.

Q26 Is it necessary for PLAN Selby to consider:

- a) Providing a revised target for the plan period to 2027 for installed renewable energy?
- b) Reviewing the 10% onsite requirement?
- c) Including specific requirements for sustainable building design such as Code for Sustainable Homes and BREEAM, subject to local viability testing?
- d) Identifying suitable areas for renewable and low-carbon schemes by technology? e.g. wind, solar, hydro?
- e) Identifying separation thresholds? What might they be?
- f) Incorporating more detailed development management policies for climate change and renewable/low-carbon energy requirements? If so what do they need to cover? For example taking into account cumulative impacts of schemes?
- g) What topics should instead be left to a subsequent SPD or guidance?
- h) How should each of the site allocations (to be identified in later stages) deal specifically with climate change and renewable energy issues?

No further comment on these issues presently.

T6 Protecting and Enhancing the Environment

Q27 a) Is this comprehensive? Are there other environmental assets that should be afforded some protection or have a policy basis?

It is important that Selby Council applies a consistent approach to that pursued by adjoining authorities.

b) Are the existing policies in the Core Strategy sufficient to protect these environmental assets or are further detailed policies necessary?

It is necessary for the Council to review the policies to ensure that they are compliant with and do not replicate other guidance. Policies should be simple and to the point.

Q28 Do the existing Selby District Local Plan policies for heritage assets remain relevant?

It is necessary for the Council to review the policies to ensure that they are compliant with and do not replicate other guidance. Policies should be simple and to the point.

Q29 Is there a case for PLAN Selby to consider developing a Local List for heritage assets?

Should the Council consider it to be necessary it should identify what such assets would qualify for this designation; it would appear on the face of it to be a too detailed approach for the SAPP. It may be more appropriate for this to be considered in supplemental documents.

Q30 a) which topics should PLAN Selby concentrate on?

Some six subject areas are highlighted. We would suggest that the PLAN Selby should take a "light" touch approach which encourages sustainable patterns of development and enables planning applications /

proposals to be determined upon their merits, not a prescriptive list which simply applies an approach of tick box "scrutiny".

Policies and proposals should not replicate the standards and guidance set out elsewhere.

b) Which topics do not require any further detailed Development Management policy because the NPPF or Core Strategy policies are sufficient?

In drafting PLAN Selby /SAPP, the Council should not simply progress policies for the sake of it or to seek to cover every eventuality.

c) Are there any other topics that PLAN Selby should address?

In drafting PLAN Selby/SAPP the Council should not simply progress policies for the sake of it or to seek to cover every eventuality.

Q31 Should PLAN Selby include policies for setting specific house types and sizes, tenures and specialist housing such as care homes and Self builds?

No. The Council should ensure that the evidence base is kept up to date and relevant, and utilises a number of sources, as well as market /industry input and that this is referred to in any policy consideration. It is not appropriate for PLAN Selby to set specific policies where these may quickly become out of date this will then inform to ensure that and /or superceded by other regulations and evidence.

Q32 a) Should PLAN Selby include further policies for any of the following?

- travel plans
- parking standards
- active traffic management
- integrated demand management
- capacity improvements
- electric vehicle charging points
- cycle routes
- car parking

No comment at this stage.

b) Are there other local transport schemes/issues that PLAN Selby should develop policies for?

As explained elsewhere in this representation it would be appropriate for the document to take into consideration the potential for major national and regional infrastructure projects such as HS 2 which is currently envisage to "plug into the existing railway infrastructure between Church Fenton and Ulleskelf. Likewise the so-called HS3 which will improve regional rail infrastructure and rolling stock, between the Regional cities. Such schemes will have an (environmental) impact upon the District and communities, strict and may bring direct and indirect benefits and economic growth. These proposals It is important that these matters are considered in the prep

Q33 a) Should PLAN Selby have more detailed general policies on design by being more specific about the minimum design standards it will seek to achieve, including policy on development density, environmental and quality design benchmarks (such as BREEAM, Lifetime Homes, Secure By Design etc.)?

It is not necessary for PLAN Selby to repeat this guidance.

b) Should PLAN Selby establish design requirements in the new allocated sites that consider the layout, orientation and aesthetic of development proposals?

A proportionate approach should be taken to each proposed site dependent upon its contribution/scale and the type of development proposed. This should not be too prescriptive. Where for example promoters /landowners have submitted site masterplans or principles plans, these may be appropriate for use if they have been used to inform the SHLAA or the allocations process.

Community, Tourism & Leisure

Q34 a) Are the Core Strategy policies sufficient, are the remaining SDLP policies still relevant and evidence based?

No comment

b) Should PLAN Selby have a more restrictive policy against the loss of rural community facilities? What could the tests be?

Community facilities are an important feature of many settlements and in the rural areas. Alongside the protection of such measures PLAN Selby should be encouraging levels of development which will secure their future vitality and not impose policy burdens which threaten their viability.

c) How can PLAN Selby promote tourist accommodation, recreation open space, community and sports facilities etc.?

No comment.

Development in the countryside

Q35 What policies should PLAN Selby include to manage development in the countryside?

Sufficient guidance is provided in the Core Strategy and each proposal should be judged on its merits.

Q36 How should the Council view large previously-developed sites in the countryside?

No comment.

Review of the remaining Selby District Local Plan Policies

Q37 a) Which SDLP Policies are suitable for continued use in PLAN Selby?

b) Which are completely out of date, or no longer necessary?

c) Could any be updated or amended for use in the PLAN Selby? How can they be brought up to date?

No comment at this stage.

Chapter 5. Settlements

Q40 a) How should Tadcaster grow and develop – what could a vision say?

It was clear at the Core Strategy Examination that there are particular issues to be dealt with in Tadcaster that are not apparent in most parts of the District. In particular was the statement that certain areas of land around the town, previously the subject of removal from the Green Belt, allocation for development and detailed planning approvals are not available for development over the Core Strategy period.

The Core Strategy sets out that there are a number of issues within the town and the need to regenerate and revitalise the town centre and to deliver new development particularly housing to introduce variety and new

product and churn into the housing supply. Such new housing can generate employment directly through construction and the supply chain but can more widely also assist with labour mobility through introducing choice and mix of type and tenure of housing.

Tadcaster's situation belies its position on the strategic transport network and its location in the so-called Golden Triangle between York, Harrogate and North Leeds. The town and town centre should be a far more prosperous and not in a position where it is effectively stagnating through underinvestment and low/no growth.

Grimston Park Estate is a major landowner with the main holding to the south of the town, including a major designated landscape and parkland. Some 40 hectares of land to the north of the town is also owned by the Estate and has been put forward to the north of the town centre. Around 24 hectares is considered suitable for development, particularly for housing. These sites are accessible and offer a range of safe and secure pedestrian routes within a reasonable walking distance to the town centre. Residual areas have been suggested for parkland within River Wharfe corridor which could contribute to wider town aspirations, although it would principally be retained for grazing and form flood storage on occasion.

Whilst the present consultation is not seen by the Council as one which considers specific sites, it is worth reiterating that the two SLAA sites contained in the current consultation document TADCASTER/002 and 003 (Land at Kelcbar) are available and deliverable. Recent remarks through the SLAA Working Group regarding site assumptions are also worth repeating. The SLAA assumes that TADCASTER /002 can deliver 571 dwellings and TADCASTER 003 some 133 dwellings; this is some 700 in total.

With the residual requirement set out at Table 2 of the SAPP that the residual requirement for Tadcaster is around 470 dwellings, we would add a note of caution that those figures are derived from a density assumption of 30 units per hectare. Material previously submitted to the Council assumes a lower density of development given the topography, site characteristics and the edge of settlement location. To this end we would suggest a lower density assumption and that all of the land put forward by the Estate at Kelcbar is removed from the Green Belt and allocated for a mix of housing.

b) What else is needed in Tadcaster that could be allocated a site?

It is suggested that the residual areas of land put forward by the Estate may be considered for a town Riverside Park, although their principal use may be retained for agriculture – grazing.

Should the Council require additional land for employment, land may be available to the south of the A64 adjacent the Estate's commercial properties at Grimston Grange. The area is divorced from the main urban area, but represents a complex of existing high quality, commercial properties.

Ulleskelf

Q58 a) How should Ulleskelf grow and develop?

As a major and property owner the Grimston Park Estate has interests in and around the village of Ulleskelf. The landholding is principally to the west of the railway line, as well as a parcel south of the village.

Some seven sites have been submitted in Ulleskelf according to the SLAA extract along with a further two at the air base which is identified as a separate entity within the settlement hierarchy. One site appears to be double counted at Four Leaf Nurseries, for the same area and yield. This would suggest the potential for some 260 dwellings in the village.

Two sites have been submitted on behalf of the Estate comprising land at West Farm (ULLESKELF/004) and land South of Barleyhorn Road (Ulleskelf/005). A revised site area was submitted for West Farm as part of the 2014 Call for Sites removing that part of the site which falls within Floodzone 2 and 3 and amended the site boundary further west. That revised site has not been taken on board in the sites contained in the

current consultation but provides an opportunity for a housing development as a partial windfall and partial greenfield development.

There are a range of community facilities in the village along with the railway station which provides rail services to Leeds and York. Whilst the narrative suggest that rails services are limited it is important that existing rail services are protected and where possible enhanced. This would improve the relative sustainability of the settlement and which could be underpinned by increasing the number of dwellings to be provided over the core strategy period.

b) What else is needed in Ulleskelf that could be allocated a site?

Grimston Park Estate has donated land to the community to provide sports pitches and facilities on the west side of the railway line.

It may be worthwhile exploring the potential to improve Ulleskelf railway station in view of proposals for HS2 and HS3; such improvement could be through car parking facilities and connectivity between the east and west sides of the village. .

Q59 Do you have any comments on the evidence that the Council considers necessary?

It appears to be a comprehensive list. The Estate and Carter Jonas are supportive of the Council's approach and happy to provide an advisory role a number of technical and working groups advising the Council on various aspects of the Evidence.

Q60 Is there any other evidence that the Council should consider gathering?

As a general comment we would suggest that it is imperative that the Council maintains an up to date evidence base to deliver sustainable development across the District.

If you have any comments regarding these representations please do not hesitate to contact me.

Yours faithfully

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