

**Selby District Council  
Local Plan Consultation**

***"PLAN Selby"***  
***(The Sites and Policies Local Plan)***

**Initial Consultation Comments Form**

---

“PLAN Selby” is the Sites and Policies Local Plan which the Council is developing to deliver the strategic vision outlined in the Core Strategy that was adopted in 2013. When adopted, PLAN Selby will form part of the Local Plan for the District against which planning applications will be assessed.

This consultation is the first stage in our on-going dialogue with you and we hope that you will take time to respond to it and help us move forward. The responses to this consultation will help inform our work and shape the District for the future.

**Comments are therefore invited as part of this Initial Consultation.**

**Please use this form to make your comments.**

Please read the main document PLAN Selby and associated papers, which are available on the Council's website at [www.selby.gov.uk/PLANSelby](http://www.selby.gov.uk/PLANSelby) and at local libraries and Public Council offices.

You will need to see what is in PLAN Selby in order to make your comments. It contains a wide range of issues and specific questions on which we would like your views. Please make sure you are clear about which part of PLAN Selby you are commenting on and ensure we have your full contact details so we can take your comments into account and so that we can contact you about the next stages.

**Completed comments forms must be received by the Council  
no later than 5pm on Monday 19th January 2015**

---

**Contact Details** - Please provide contact details and agent details, if appointed

	Personal Details	Agent Details (if applicable)
Name	Samuel Smith Old Brewery (Tadcaster)	Stuart Vendy
Address	c/o Agent	Cunnane Town Planning LLP PO BOX 305 Manchester M21 3BQ
Postcode		M21 3BQ
Telephone no.		0161 282 9290
Email address		stuart.vendy@cunnanetownplanning.co.uk

**It will be helpful if you can provide an email address so we can contact you electronically**

## Comment(s)

Please ensure you provide reference to the Question and Topic area for each comment you wish to make.

Topic / Chapter

Question no.  Paragraph

Please see the attached sheets.

(Text is limited to the available area to ensure all text is visible. Continue on a separate sheet if necessary)

Topic / Chapter

Question no.  Paragraph

(Text is limited to the available area to ensure all text is visible. Continue on a separate sheet if necessary)

## Comment(s)

Please ensure you provide reference to the Question and Topic area for each comment you wish to make.

Topic / Chapter

Question no.

Paragraph

(Text is limited to the available area to ensure all text is visible. Continue on a separate sheet if necessary)

Topic / Chapter

Question no.

Paragraph

(Text is limited to the available area to ensure all text is visible. Continue on a separate sheet if necessary)

**Additional Comments** - Please provide any additional comments you may wish to make.

(Text is limited to the available area to ensure all text is visible. Continue on a separate sheet if necessary)

---

### Comment Submission Statement

All comments must be made in an email or in writing if they are to be considered. 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.

Signed

Dated

19th January 2015

**Please ensure you save a copy of your completed comments form to your computer before sending by email**

**Completed comments forms must be received by the Council  
no later than 5pm on Monday 19th January 2015**

**Email:        ldf@selby.gov.uk**

**Post to:      Policy and Strategy Team, Selby District Council, Civic Centre,  
Doncaster Road, Selby YO8 9FT**

**Draft Representations : The Sites and Policies Local Plan – Initial Consultation 24th Nov 2014 to 19<sup>th</sup> January 2015**

Reference	Issue/Comment
Question 1	<p>The Sustainability Report will need to ensure that it is conducted and completed so as to fully comply with all relevant regulations and legal requirements. Whilst Sustainability Appraisal Report provide the Aims and Objectives of the process it is important to appreciate that this is an ongoing process, and that the effects of any changes and amendments made to the emerging plan need to be fully appraised and considered in the preparation of the plan.</p>
Question 2	<p>The Habitat Assessment Regulations Report will need to ensure that it is conducted and completed so as to fully comply with all relevant regulations and legal requirements. Whilst the Habitat Regulations Report provides the Aims and Objectives of the process it is important to appreciate that this is an ongoing process, and that the effects of any changes and amendments made to the emerging plan need to be fully appraised and considered in the preparation of the plan.</p>
Question 3	<p>The Duty to Co-operate Statement will need to ensure that it is conducted and completed so as to comply with fully comply with all relevant regulations and legal requirements. Whilst the Duty to Co-operate Statement provides the Aims and Objectives of the process it is important to appreciate that this is an ongoing process, and that the effects of any changes and amendments made to the emerging plan need to be fully appraised and considered in the preparation of the plan.</p>
Question 4	<p>The SAPP Engagement Plan will need to ensure that it is conducted and completed so as to fully comply with all relevant regulations and legal requirements. The Engagement Plan provides no specific commitment to engage with Stakeholders as a specific group. Paragraph 3.15 of the Draft Engagement Plan provides that</p> <p><i>“The council <u>may</u> seek specific comments from key stakeholders including major landowners affected by the PLAN Selby as it is prepared.”</i></p> <p>The advice within paragraph 155 of NPPF is clear that:</p> <p><i>“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential.”</i></p> <p>This is particularly the case when such engagement and collaboration is key to the delivery of a sustainable and comprehensive plan for the regeneration of a settlement such as Tadcaster.</p>

	<p>Firstly, the Draft Engagement Plan fails to adequately commit the Council to engagement and collaboration with key stakeholders that have an interest in the proper planning of the district. This failure will lead to a plan which does not reflect the aim of achieving a 'collective vision' provided for within NPPF and consequently the sustainable development of the area.</p> <p>Secondly, it is unclear why the Draft Engagement Plan highlights 'major land owners' in this text. There is no such differentiation within NPPF and seeking to focus upon specific groups of stakeholders at the apparent expense of others fails to ensure that the emerging plan is developed on a firm and clear understanding of the positions of all stakeholders.</p> <p>Lastly, whilst the Draft Engagement Plan provides the Aims and Objectives of the process it is important to appreciate that this is an ongoing process, and that the effects of any changes and amendments made to the emerging plan need to be fully appraised and considered in the preparation of the plan.</p>
<p><b>Question 5</b></p>	<p>These are not the correct objectives for the emerging Plan to pursue. The objectives need to be modified and supplemented with further aims of that more accurately reflect the overriding 'golden thread' of sustainability which is intended to permeate all development management and planning policy decisions.</p> <p><b>Comments upon draft objectives:</b></p> <ol style="list-style-type: none"> <li>1- The identification of 'new' development sites (allocations) presupposes that there is an identified need for such allocations in the District. This aim should be tempered with reference to the 'need' for new allocations and the importance of ensuring that allocations are only made where the opportunity can be clearly demonstrated to be '<i>... deliverable and suitable, and in the most sustainable location</i>'.</li> <li>2- This aim references that the site selection procedure will include '<i>... consideration of sustainability objectives</i>'. This underplays the importance of achieving sustainable development when developing new planning policies. Guidance in NPPF is clear that sustainability is the 'golden thread' running through all such decisions and that it is the overriding aim of all planning decisions. The Criterion should make it clear that if a site cannot be demonstrated to be sustainable then it shall not progress to allocation.</li> <li>3- No comment</li> <li>4- The criterion considers that the Site Allocation Plan should set Green Belt boundaries to endure beyond the life of the Plan. This was of course the aim of the previous development plan that dealt with site allocations, The Selby Local Plan (2005). This plans set the detailed Green Belt boundaries for the District with the aim of them enduring beyond the life of that plan. The</li> </ol>

criterion however seems to suggest that the previous plan has failed and that the case has been made of a Green Belt review in this emerging plan. This is not the case.

It is clear from all guidance related to Green Belt through the years that such designation should be treated as permanent fixtures and that changes should only be made in 'exceptional circumstances' (NPPF paragraph 83 and NPPG para 044 Oct. 2014). The development of Core Strategy policy in relation to Green Belt review made it very clear that the case for a Green Belt review had not been made, the policy provision was included simply to ensure that if a case was to be made in the future the policies of the plan were available to guide and control any review.

A clear case needs to be set out in evidence before a review of Green Belt boundaries can be triggered. This has not occurred to date and therefore it is inappropriate and in conflict with policy to include this as an aim of the emerging plan.

The emphasis of this aim should be to retain current Green Belt boundaries unless a review is required, and the test of exceptional circumstance has been met.

5- No comment

6- No comment

7- This criterion appears to provide for a presumption against the development of 'criteria led policies'. Whilst the criterion provides that they should only be used when necessary, this would apply equally to area based policies. There is no justification for identifying criteria based policies as less preferable to area based policies, each format of policy wording has an important part to play in the management of development within the District.

Two further objectives should also be added:

Firstly, to ensure the protection of the unique historic, urban and countryside character and environments within the District. This subject has recently been the subject of relevant case *law* (East Northamptonshire, English Heritage and The National Trust v. Secretary of State for Communities and Local Government and Barnwell Manor Wind Energy Ltd.) which has re-emphasised the importance to be attached to preserving the asset in the face of potential harm.

Secondly, the aims should provide for the creation of settlement specific strategies to ensure that they properly tailor policies for regeneration, development and preservation to the individual settlements. This is to adequately reflect the fact that

	<p>the plan is not solely interested in specific allocations, but aims to comprehensively guide and encourage the regeneration of settlements at a higher (economic, social and environmental) level than simply identify sites to meet needs.</p>
<b>Question 6</b>	<p>a) With regard Topic 1 it is important to note that the plans role in 'Providing Homes' is not just about the allocation of sites. It is also important to facilitate the use of fiscal incentives and the sale of Council owned buildings in order to meet the identified needs of the District.</p> <p>b) The topics included in the paragraph 3.2 should be added to, as set out below. Firstly, 'Cultural and Historic Heritage' should be added. The subject has been developed considerably since the Council last reviewed their policies on this matter. The approach to the assessment and consideration of proposals which may have an effect on historic assets has been developed considerably in the recent past, and these new factors should be included in the Councils policies. Secondly, 'Green Belt' should be identified as a specific topic. The protection these areas has recently been re-emphasised in the amendment guidance contained with NPPG (Oct 2014) and this needs to be reflected in the overarching polices of the development plan dealing with these matters.</p> <p>c) Suggested order is: T6, T5, T3, T2, T1, T4</p>
<b>Question 7</b>	<p>a) The adoption of the 31<sup>st</sup> March 2015 base date at this early stage is insufficiently flexible and does not allow for potential delays in the timetable towards preparation of the adopted document. To adopt an inflexible base date at this point, prevents the meaningful application of evidence and information being included in the plan preparation process leading to the potential adoption of a plan based upon out of date and irrelevant information.</p> <p>An approach of adopting an interim base date with the undertaking to update this date with new information is a more robust and practical approach to this issue.</p> <p>b) The broad principles of the calculation appear to be in line with that of the Core Strategy, however column C: Outstanding plots with PP 31<sup>st</sup> March 2014 appears to be inaccurate. Whilst the base data for this information is not referenced, it is clear that the 25 dwellings cited in relation to Tadcaster fails to take account of the 147 dwelling committed at Mill Lane, Tadcaster. They should be added to the commitments column in order that an accurate reflection of the housing supply situation is provided for in Table 2.</p>
<b>Question 8</b>	<p>a) The plan should not over allocate, as this may lead to unsustainable travel and development patterns contrary to national policy and guidance. The Core Strategy (policy SP6) has built in safeguards with regard the 'non-delivery' of dwellings where needed and over allocation is therefore neither necessary nor desirable in the interests of good planning.</p>



	<p>b) The best way to ensure delivery is to allocate in locations where there has been a market demand, willing landowners and successful delivery of housing in the past. The timing and consequent delivery of those sites can then be controlled through phasing in order to maintain delivery over the plan period.</p> <p>c) 'Contingency sites' in case of failure to deliver elsewhere in the district are not required, other than to secure the potential operation of phase 3 of policy SP6. Where they are required under the possible operation of policy SP6 sites should be located in or on the edge of the remaining sustainable settlements in the District.</p> <p>There is no reasonable case for the over allocation of sites generally within the District. To do so risks adoption of a policy of uncontrolled development, leading to undesirable and unsustainable development patterns.</p>
<p><b>Question 9</b></p>	<p>a) The Percentage Growth model neither reflects the sustainability of the settlement in question, nor the desire to encourage/restrict growth in that location. The approach should be replaced with an approach on the basis of an individual settlements relative sustainability and its ability provide deliverable sites. The proportionate Growth Model seems to be little more than 'predict and provide', with no account of the relative sustainability of individual settlements.</p> <p>It should be recognised that identification of a settlement as a DSV does not equate to a requirement to allocate sites within or on the edge of that settlement. It is quite possible not to allocate sites in settlements where it is unsustainable to do so, or suitable sites are unavailable.</p> <p>b) In assessing the final minimum targets that individual settlements should aim to provide the following additional criteria are of relevance:</p> <ul style="list-style-type: none"> <li>- Current size of the settlement and the ability of services and infrastructure to support further development.</li> <li>- The relative sustainability of the settlement compared to other options.</li> <li>- The importance attached to the preservation of Green Belt boundaries and the need to explore alternative option before Green Belt sites are released.</li> <li>- The protection of important Cultural and Built Heritage assets in the District.</li> <li>- The availability of sites within the settlement.</li> </ul>
<p><b>Question 10</b></p>	<p>The criteria for site selection are set out below in order of importance:</p> <ol style="list-style-type: none"> <li>1) Sustainability</li> <li>2) Character of individual settlements</li> <li>3) Green Belt</li> <li>4) Previously Developed Land</li> <li>5) Sustainable Transportation</li> </ol>

	<p>6) Infrastructure and Services</p> <p>7) Environment and Natural Resource</p> <p>8) Accessibility</p> <p>9) Flood Risk</p>
<b>Question 11</b>	The contingency Phase 3 sites should be directed to the main settlement of Selby as the next highest sustainable location within the Core Strategy settlement hierarchy.
<b>Question 14</b>	<p>a) Yes, there is a need for the Council to prepare a criteria based policy for the consideration of proposals. This is needed to ensure that schemes and proposals that have not necessarily been anticipated should be adequately controlled and that the basic functions of the planning system (e.g. protection of residential amenity, environmental protection etc.) are protected.</p> <p>b) A criteria based policy should be presented in a hierarchical manner in order to assess key elements of the proposal against the requirements of sustainable development. The factors and related hierarchy should be the same as those identified in our answer to question 10 in order that proposals subject to the policy are required to meet the same standards as proposal that have come forward with explicit policy support.</p>
<b>Question 15</b>	<p>a) The approach to established employment areas should maintain a general protection of these areas against the development of higher value uses. This is in order to protect against the erosion of their primary employment generating function. Whilst relatively low value land uses, employment areas provide an important component to ensuring that settlements meet the requirements of residents in a sustainable manner through the potential for job opportunities close to employee's homes.</p> <p>b) A detailed policy that applies to employment areas would ensure that the circumstances under which changes to non-employment uses, and potential bad neighbour development proposals would be considered are clearly and concisely set out on within specific areas of the Local Plan.</p>
<b>Question 17</b>	The approach to employment development in the DSV's should recognise their primarily rural nature and their role in meeting local accommodation and service needs. Policies dealing with employment uses in these areas should concentrate on the development of agricultural employment opportunities and not seek to expand the employment function of the villages beyond those employment uses.
<b>Question 18</b>	The required development policies in addition to those in the Core Strategy, include the need to define areas in which the landscape, cultural and heritage assets are particularly valuable and should be protected, in addition areas where the, for example, renewable energy is not appropriate.

	<p>Such policy guidance would provide for a clearer and more transparent policy approach to the consideration of proposals in these rural areas.</p>
Question 19	<p>The majority of the former mine sites, airfields and power stations are typically justified in locations where development is normally restricted on the basis of national needs and/or requirements. In order to ensure that these special circumstances are properly reflected in the sites future use, they have approved with the attachment of conditions which require the restoration of the site upon completion of the activities approved. Such site have also been removed from the definition of 'previously developed land' contained within NPPF.</p> <p>There is no justification for further development of these sites either in relation to employment or other development needs. The original requirement to restore these sites to their previous use and condition should be applied to the consideration of proposal for the reuse of these sites in the future.</p>
Question 20	<p>My client has undertaken a number of detailed assessments of the needs and requirements of Tadcaster, as well as the operation and nature of the use of particular facilities in the settlement. This, in combination with detailed assessment of case studies and best practice in the regeneration and development of similar sized market towns, led to the preparation of a town centre regeneration scheme. The summary plan has already been presented to the Council in a number of forums and is attached to this representation for completeness.</p> <p>The Council needs to arrive at a comprehensive regeneration scheme for Tadcaster. There is no coherent, considered or evidence based approach to the regeneration of the town.</p> <p>My client looks forward to detailed and constructive engagement with the Council in developing policy to facilitate the regeneration of Tadcaster.</p> <p>In relation to the specific issues that PLAN Selby should consider, evidence needs to be gathered with regard the use and operation of the car parking facilities within the town in order to ensure that these land assets are put to the most appropriate use.</p>
Question 21	<p>a) and b)</p> <p>There are a number of areas which should be considered in detail in order to arrive at a robust, relevant and useful planning document.</p> <ul style="list-style-type: none"> <li>- Special Policy Areas for Town Centre regeneration – The development of such an area in Tadcaster could assist in highlighting and prioritising the issues that require addressing in the town, as well as guiding the Council in leveraging private sector interests into the settlement.</li> </ul>

	<ul style="list-style-type: none"> <li>- Open Space – the protection of open space assets within the settlement are of critical importance to it both is character and future wellbeing.</li> <li>- Heritage assets – The identification of locally important heritage assets (including buildings, open spaces and natural features), will assist in preservation and enhancement of those assets.</li> <li>- Regeneration schemes – The development of a specific regeneration scheme that has the support of residents, stakeholders and landowners is critical to the successful development of Tadcaster.</li> </ul>
<p><b>Question 22</b></p>	<p>Settlement limits should be drawn tightly around the existing settlements in order to foster regeneration and ensure that settlements remain defined, distinct and maintain their individual characters. This is particularly relevant to those settlements with Green Belt boundaries, where these aims are key facets of the approach to defining these policy areas, and remain key to the purpose of including land within them.</p> <p>In is notes at paragraph 3.103 that the document presupposes that PLAN Selby <u>will</u> need to reappraise designations for Green Belt. This is not the case, and was not set out in the Core Strategy.</p> <p>The Core Strategy provides the ability to reappraise the Green Belt boundaries in the District if ‘exceptional circumstances’ are demonstrated in evidence, to exist. No such case has been made to date and therefore the presumption must be that the Green Belt boundaries set within the last Local Plan will endure beyond the life of that plan, and will only be adjusted if the relevant national tests are met.</p> <p>Whilst a more accurate reflection of the situation is provided at paragraph 3.107, the certainty with which the emerging documents states that Green Belt will be reappraised appears to have prejudged the outcome of this further work.</p> <p>The proposal at paragraph 3.108 to provide a separate study to examine Green Belt boundaries, development limits and Strategic Countryside Gaps, again presupposes that such reviews are required. Specifically with regard the examination of Green Belt it must first be shown that there exist ‘exception circumstances’ that justify such as review. This is clearly set out within NPPF and NPPG. Until that evidence is available it is unjustified to review Green Belt boundaries.</p> <p>Notwithstanding the above, the preparation of an entirely separate document dealing with these issues both muddies the relationship the emerging statutory document and appears as a disjointed and confused review of the issue. The document should not be consulted upon separately, and should form a formal part of the preparation of the PLAN Selby document.</p> <p>There have been no timescale provided with regard the likely preparation timescale of the Green Belt boundaries, development limits and Strategic Countryside Gaps document, and therefore no meaningful comment can be made with regard these</p>

	issues until this critical component of the evidence base has been completed and published.
<b>Question 24</b>	There is no need for the identification of Safeguarded Land around the settlement of Tadcaster, as under the operation of policy SP6 there will currently be an over allocation of housing sites in and around the settlement. The adopted Core Strategy policy also requires that the development needs over and above this level are to be met outside the town.
<b>Question 25</b>	<p>Within Tadcaster, there are a number of specific and detailed infrastructure requirements that have not been identified including traffic calming facilities, the provision of loading/unloading bays and the provision of appropriately designed and located parking facilities.</p> <p>The detailed requirements that have been identified can be set out during the course of further detailed engagement with the Council on the specific issue of regenerating Tadcaster.</p>
<b>Question 26</b>	<p>Comments on the necessity of the PLAN Selby's consideration fo the specific issues outlined are as follows:</p> <ul style="list-style-type: none"> <li>a) If PLAN Selby is to consider a Revised Target for the Plan period, this must be accompanied with a proposed action in relation to the target. For example what actions will be triggered if the target is not reached, and/or if the target is exceeded?</li> <li>b) The provision of an arbitrary 10% Target for 'onsite' renewable energy is both unnecessary and counterproductive. This should be replaced with a requirement to ensure that the potential renewable energy sources are secured where viable on individual development sites.</li> <li>c) Specific BREEAM or Code for Sustainable Homes requirements are similarly unnecessary and counterproductive.</li> <li>d) Suitable sites should be identified for the development of renewable energy developments. This should be alongside a presumption against development of these technologies outside of these sites, unless they can be shown to be acceptable.</li> <li>e) There should be no arbitrary identification of thresholds in relation to renewable energy schemes. Any such parameters should be based upon evidence and best practice.</li> </ul>
<b>Question 27</b>	<p>b) These are insufficient and further detailed policies are necessary bearing in mind the availability of new guidance and policies, as well as case law on many of these issues.</p> <p>The need to revisiting these issues is set out explicitly within the Core Strategy at paragraph 7.72, which reads:</p>

	<p><i>“7.72 Designations of specific areas such as Sites of Importance for Nature Conservation, Landscape Character Assessments, heritage assets, Conservation Areas, Local Amenity Areas and wider landscape character issues will be considered in future Local Plan Documents and shown on the Proposals map. Until such time, sites identified in the adopted Selby District Local Plan will continue to be afforded protection.”</i></p> <p>There is consequently an adopted undertaking in the Core Strategy to complete this work and it should be completed as part of the preparation of this document. It is clear that Core Strategy Inspector identified the strategy as sound on the premise that these tasks would be undertaken.</p>
<p><b>Question 28</b></p>	<p>Whilst the broad thrust of policies in the Local Plan remain relevant their detailed provisions need to be updated in the light of new case law (<i>East Northamptonshire, English Heritage and The National Trust v. Secretary of State for Communities and Local Government and Barnwell Manor Wind Energy Ltd.</i>).</p> <p>The policies also need to be updated with the creation of a list of Locally Important Heritage Assets, and the development of specific policies and protections that will ensure these are enhanced and preserved in an appropriate manner.</p>
<p><b>Question 29</b></p>	<p>The PLAN Selby should include the creation of a list of Locally Important Heritage Assets, and the development of specific policies and protections that will ensure these are enhanced and preserved in an appropriate manner.</p> <p>This should not be restricted to built development, but also include open spaces and natural features that make important contributions to the character and setting of an area.</p>
<p><b>Question 30</b></p>	<p>PLAN Selby should concentrate on the creation of a comprehensive, cohesive and agreed approach to the regeneration of Tadcaster. This approach should include detailed and extensive engagement with stakeholders in the town, provide the appropriate and evidence based interventions to allow key sites to be developed for appropriate uses, and ensure support from as broad a cross section of the community as possible.</p> <p>All of the topic areas identified in Table 9 should be provided with detailed policies and allocations where required as this is the principal purpose of the emerging document (to develop the general policies of the Core Strategy). To not do so, undermines the purpose of the document.</p> <p>The inclusion of the former mine sites under the ‘development in the countryside’ topic is inappropriate and unnecessary. The management of develop in these</p>

	locations is adequately controlled via countryside policies and designations, as well as the conditions requiring the restoration of these sites upon cessation of their use.
<b>Question 31</b>	No, there is no justification for the inclusion of policies that set house sizes, types and, tenures etc. it is best to let the market decide on these features of new homes.
<b>Question 32</b>	<p>PLAN Selby should include further polices on all of the issues outlined within question 32 in order to provide a comprehensive and complete framework to guide new developments in the District.</p> <p>Specifically there is also a need to include police son the following:</p> <ul style="list-style-type: none"> <li>- Need to plan for reducing the need to travel – there is a need to emphasise the importance of meeting only local needs and providing for those needs sustainably and usually close to where they are generated.</li> <li>- There is also a need to specifically plan for public parking provision in Tadcaster. There is a critical relationship between parking and regeneration, and alternative potential strategies need to be considered.</li> <li>- The provision of detailed Parking standards above and beyond the approach of NYCC would be useful for introducing a level of flexibility, especially in locations that are well served by public transport provision.</li> </ul>
<b>Question 33</b>	The provision of detailed general policies in relation to housing development are unlikely to be of use in the development management decisions of the Council on a day to day basis. The issue is simply too varied and detailed for prescriptive policies to be of any particular value.
<b>Question 34</b>	<p>The Core Strategy polices are too strategic to be of value, and the Selby District Local Plan policies were formed on the basis of out of date evidence. Consequently a comprehensive approach to the development of these policies should be taken.</p> <p>Specifically:</p> <ol style="list-style-type: none"> <li>a) New evidence should be sought to under pin the policies. Merely copying policies which were adopted 10 years ago and that are based upon evidence etc. from the mid 1990's risks weakening the overall plan and making policies irrelevant.</li> <li>b) The principle of seeking to preserve existing facilities is supported.</li> <li>c) All should be promoted sustainably – with a focus on the town and sustainable centres rather than the countryside. The countryside within Selby District is a 'working' countryside and has its own economic base not focused on tourism. This can't compete reasonably with other higher level facilities. The focus should be on meeting local needs, and not the development of tourism as an economic base for the countryside.</li> </ol>

Question 35	PLAN Selby should include further restriction on the use of farm buildings, and the establishment of inappropriate uses such as new residential development and tourism in the open countryside.																																																								
Question 36	<p>Restoration Conditions should be backed by the policy, and no allocations should be made on sites where they are present. The uses are typically temporary in nature, and excluded from the definition of Previously Developed Land in NPPF for this specific reason.</p> <p>Any proposals for sites that are not subject to restoration should provide a clear outline of the sustainability benefits of the proposed reuse, and comply in all other respects with sequential approaches to site identification/allocation.</p>																																																								
Question 37	<p>Policies which we consider should be retained for continued use, out of date or should be updated/amended are set out below:</p> <table border="0" data-bbox="347 891 1316 2027"> <tr> <td>SL1 – Out of Date</td> <td>VP1– To be updated and retained</td> </tr> <tr> <td>SG1– Out of Date</td> <td>VP2– To be updated and retained</td> </tr> <tr> <td>ENV1 – To be updated and retained</td> <td>VP4– To be updated and retained</td> </tr> <tr> <td>ENV2– To be updated and retained</td> <td>RT1– To be updated and retained</td> </tr> <tr> <td>ENV3– To be updated and retained</td> <td>RT2– To be updated and retained</td> </tr> <tr> <td>ENV4 – To be updated and retained</td> <td>RT4– Out of Date</td> </tr> <tr> <td>ENV9– To be updated and retained</td> <td>RT5– To be updated and retained</td> </tr> <tr> <td>ENV11– To be updated and retained</td> <td>RT6– To be updated and retained</td> </tr> <tr> <td>ENV12– To be updated and retained</td> <td>RT7– To be updated and retained</td> </tr> <tr> <td>ENV13– To be updated and retained</td> <td>RT8– To be updated and retained</td> </tr> <tr> <td>ENV15– Out of Date</td> <td>RT9– To be updated and retained</td> </tr> <tr> <td>ENV16– To be updated and retained</td> <td>RT10– To be updated and retained</td> </tr> <tr> <td>ENV17– To be updated and retained</td> <td>RT11– To be updated and retained</td> </tr> <tr> <td>ENV24– To be updated and retained</td> <td>RT12– To be updated and retained</td> </tr> <tr> <td>ENV25– To be updated and retained</td> <td>RT13– To be updated and retained</td> </tr> <tr> <td>ENV27– To be updated and retained</td> <td>S3– To be updated and retained</td> </tr> <tr> <td>ENV28– To be updated and retained</td> <td>S4 – To be updated and retained</td> </tr> <tr> <td>ENV29– To be updated and retained</td> <td>S5– To be updated and retained</td> </tr> <tr> <td>ENV30– To be updated and retained</td> <td>CS1– To be updated and retained</td> </tr> <tr> <td>ENV31– To be updated and retained</td> <td>CS2– To be updated and retained</td> </tr> <tr> <td>ENV32– To be updated and retained</td> <td>CS3– To be updated and retained</td> </tr> <tr> <td>H2– Out of Date</td> <td>CS4– To be updated and retained</td> </tr> <tr> <td>H2B– To be updated and retained</td> <td>CS5– To be updated and retained</td> </tr> <tr> <td>H5– To be updated and retained</td> <td>CS6– To be updated and retained</td> </tr> <tr> <td>H8– To be updated and retained</td> <td>BAR/2– To be updated and retained</td> </tr> <tr> <td>H12– To be updated and retained</td> <td>CHF/2– To be updated and retained</td> </tr> <tr> <td>H13– To be updated and retained</td> <td>CFA/1– To be updated and retained</td> </tr> <tr> <td>H14– To be updated and retained</td> <td>KEL/1– To be updated and retained</td> </tr> </table>	SL1 – Out of Date	VP1– To be updated and retained	SG1– Out of Date	VP2– To be updated and retained	ENV1 – To be updated and retained	VP4– To be updated and retained	ENV2– To be updated and retained	RT1– To be updated and retained	ENV3– To be updated and retained	RT2– To be updated and retained	ENV4 – To be updated and retained	RT4– Out of Date	ENV9– To be updated and retained	RT5– To be updated and retained	ENV11– To be updated and retained	RT6– To be updated and retained	ENV12– To be updated and retained	RT7– To be updated and retained	ENV13– To be updated and retained	RT8– To be updated and retained	ENV15– Out of Date	RT9– To be updated and retained	ENV16– To be updated and retained	RT10– To be updated and retained	ENV17– To be updated and retained	RT11– To be updated and retained	ENV24– To be updated and retained	RT12– To be updated and retained	ENV25– To be updated and retained	RT13– To be updated and retained	ENV27– To be updated and retained	S3– To be updated and retained	ENV28– To be updated and retained	S4 – To be updated and retained	ENV29– To be updated and retained	S5– To be updated and retained	ENV30– To be updated and retained	CS1– To be updated and retained	ENV31– To be updated and retained	CS2– To be updated and retained	ENV32– To be updated and retained	CS3– To be updated and retained	H2– Out of Date	CS4– To be updated and retained	H2B– To be updated and retained	CS5– To be updated and retained	H5– To be updated and retained	CS6– To be updated and retained	H8– To be updated and retained	BAR/2– To be updated and retained	H12– To be updated and retained	CHF/2– To be updated and retained	H13– To be updated and retained	CFA/1– To be updated and retained	H14– To be updated and retained	KEL/1– To be updated and retained
SL1 – Out of Date	VP1– To be updated and retained																																																								
SG1– Out of Date	VP2– To be updated and retained																																																								
ENV1 – To be updated and retained	VP4– To be updated and retained																																																								
ENV2– To be updated and retained	RT1– To be updated and retained																																																								
ENV3– To be updated and retained	RT2– To be updated and retained																																																								
ENV4 – To be updated and retained	RT4– Out of Date																																																								
ENV9– To be updated and retained	RT5– To be updated and retained																																																								
ENV11– To be updated and retained	RT6– To be updated and retained																																																								
ENV12– To be updated and retained	RT7– To be updated and retained																																																								
ENV13– To be updated and retained	RT8– To be updated and retained																																																								
ENV15– Out of Date	RT9– To be updated and retained																																																								
ENV16– To be updated and retained	RT10– To be updated and retained																																																								
ENV17– To be updated and retained	RT11– To be updated and retained																																																								
ENV24– To be updated and retained	RT12– To be updated and retained																																																								
ENV25– To be updated and retained	RT13– To be updated and retained																																																								
ENV27– To be updated and retained	S3– To be updated and retained																																																								
ENV28– To be updated and retained	S4 – To be updated and retained																																																								
ENV29– To be updated and retained	S5– To be updated and retained																																																								
ENV30– To be updated and retained	CS1– To be updated and retained																																																								
ENV31– To be updated and retained	CS2– To be updated and retained																																																								
ENV32– To be updated and retained	CS3– To be updated and retained																																																								
H2– Out of Date	CS4– To be updated and retained																																																								
H2B– To be updated and retained	CS5– To be updated and retained																																																								
H5– To be updated and retained	CS6– To be updated and retained																																																								
H8– To be updated and retained	BAR/2– To be updated and retained																																																								
H12– To be updated and retained	CHF/2– To be updated and retained																																																								
H13– To be updated and retained	CFA/1– To be updated and retained																																																								
H14– To be updated and retained	KEL/1– To be updated and retained																																																								



	<p>H15– To be updated and retained  EMP2 - To be updated and retained  EMP3– To be updated and retained  EMP4– To be updated and retained  EMP5– To be updated and retained  EMP6 - To be updated and retained  EMP8– To be updated and retained  EMP9– To be updated and retained  EMP10 - To be updated and retained  EMP11– Out of Date  EMP13– To be updated and retained  EMP14– To be updated and retained  EMP14A– To be updated and retained  T1– To be updated and retained  T2– To be updated and retained  T5– To be updated and retained  T5A– To be updated and retained  T7– To be updated and retained  T8– To be updated and retained  T9– To be updated and retained  T10– To be updated and retained</p>	<p>RIC/1– To be updated and retained  SEL/5– To be updated and retained  SEL/6– Out of Date  SEL/7– Out of Date  SEL/7A– Out of Date  SEL/10– To be updated and retained  SEL/12– To be updated and retained  SEL/13– To be updated and retained  SEL/14– To be updated and retained  SEL/16– To be updated and retained  TAD/4– To be updated and retained  TAD/7– To be updated and retained</p>
<p><b>Question 40</b></p>	<p>a) The Broad content of my client’s strategy for the regeneration of Tadcaster has already been presented to officers, however in summary my client is deeply concerned that new housing development in isolation will not improve the vitality and viability of the Town Centre. The theory that an increase in the local population will drive regeneration is not based on sound evidence and is not well-founded for Tadcaster in light of its characteristics.</p> <p>The Council has alleged that as the Selby Retail, Commercial and Leisure Study (“SRCLS”) (2009) shows that Tadcaster is underperforming as a local service centre, housing development alongside proposed town centre regeneration is required to reverse the decline and regenerate Tadcaster Town Centre.</p> <p>That argument is flawed, unsupported by evidence and consequently unsound for the following reasons:</p> <ul style="list-style-type: none"> <li>• Housing growth at the scale proposed in the Strategy will not result in a significant increase in footfall and trade without a corresponding improvement of the existing shopping and leisure offer. To the contrary it will only serve to increase unsustainable travel patterns if residents shop elsewhere.</li> <li>• Existing shopping patterns that result in significant leakage of expenditure to competing centres will not be reversed by housing growth given the weakness</li> </ul>	

of the existing retail offer and high level of out commuting for Tadcaster in any event.

- The peripheral location of any proposed allocated housing sites that the Council is contemplating will only serve to exacerbate existing shopping patterns and to increase leakage of spend to competing centres and to increase further unsustainable travel patterns.

The approach is facile and reflects a failure on the part of the Council to address any vision or proper strategy for Tadcaster of the type that the objector has been promoting but which the Council is failing to progress. A proper Core Strategy should be looking to provide clear strategic support for such a vision.

Each issue is considered in some more detail below.

**2. Housing growth at the scale proposed will not result in a significant increase in footfall and trade without the corresponding improvement of the existing shopping and leisure offer.**

The central findings of the SRCLS that Tadcaster Town Centre is underperforming are not in dispute, but the assertion that housing growth at the scale proposed will have a significant impact on improving the vitality and viability of the town centre is not explained nor is it supported by any evidential base, let alone an analysis that is pertinent to Tadcaster.

In this regard, it is important to review the findings of the SRCLS in relation to housing growth.

Chapter 11 of the SRCLS sets out the findings of the assessment of Selby District Council's housing projections on the ability to generate additional retail capacity within the town centre. It concludes that based on the housing growth scenarios set out within the SDCS, the number of new dwellings proposed would generate insufficient additional expenditure to support any significant amount of new convenience or comparison goods floor space by 2026, given the town's proximity to competing centres at York and Wetherby to the west.

**Table 1 Emerging Core Strategy Preferred Housing Distribution Option**

Area	New Allocations	-50% ONS Allowance	Average Household Size	Population Increase	Additional Population Increase from Designated Service Villages & Secondary Villages
Tadcaster	680	340	2.4	816	428

Source: SCRLS 2009

**Table 2 Emerging Core Strategy Preferred Housing Distribution Option Expenditure**

Area	Population Increase	Convenience TAE 2026 (£m)	Convenience Market Share	Comparison TAE 2026 (£m)	Comparison Market Share 2026	Convenience Expenditure 2026 (£m)
Tadcaster	1244	£2.35	49.6%	£9.50	9.0%	£1.16

Source: SCRLS 2009

In addition, proper analysis of the conclusions and recommendations of the SCRLS reveals that it does not explicitly recommend housing growth as a requirement to improve the vitality and viability of Tadcaster Town centre (consistent with the analysis of the figures above).

The Strengths Weaknesses Opportunities Challenges (SWOC) analysis of the town centre in paragraph 6.3 of the SRCLS does not identify the scale of the existing catchment as a weakness to be addressed by additional new housing.

The only reference to housing growth to support the regeneration of the town centre is in paragraph 5.169 with reference to a comment from Tadcaster Town Council which is apparently of the view that in order for Tadcaster to develop and become more vibrant, footfall within the town centre needs to increase and it asserts this can only happen with more housing within the surrounding area. This assertion is not evidence-based nor rooted in any analysis which would demonstrate such an effect would occur.

There is therefore no evidence within the SRCLS to support the assertion that housing growth is required to support the vitality and viability of Tadcaster town centre. To the contrary, the assessment of housing projections shows that insufficient additional expenditure would be generated locally from the levels of housing that the Council is proposing to support any significant new retail floorspace and therefore such levels would have very little impact in helping to support existing retailers. By contrast, the additional of significant amounts of housing should have been considered against the potential unsustainability of such development in terms of replicating existing patterns of travelling unsustainably away from the Town Centre for both shopping and employment, particularly by reference to any understanding of where such housing might be located.

***'Best Practice' Town Centre Regeneration Guidance and Case Studies***

In reviewing the evidence that does exist to demonstrate that housing growth is not a key factor in successful town centre regeneration, consideration has been given recent 'Best Practice' guidance (Appendix 1) on improving the vitality and viability of town centres. A series of case studies of towns with similar characteristics to Tadcaster but with different levels of housing growth and regeneration success is also provided (Appendix 2). Again, it is notable that the Council's strategy is not based upon any guidance, evidence or analysis

The recent 'Best Practice' guidance on how to revitalise our town centres includes an assessment of the Mary Portas Review - An independent review into the future of our high streets and other guidance from the Action for Market Towns and British Retail Consortium. These documents show that the promotion of housing growth is not a relevant factor in improving the vitality and viability of town centres, but rather the need for effective leadership and partnership between retailers and agencies, less red tape and regulation, lower business rates and removal of parking charges, the need to maintain an attractive environment and better promotion and marketing are factors in success. The case studies provided at the end of this section reinforce the message of the recent 'Best Practice' guidance as follows.

The Matlock town centre case study shows that whilst the town has seen an increase in the local population through modest housing growth, this did not translate into a corresponding increase in footfall due to a number of other key factors including the poor quality of the existing retail units to attract national retailers, lack of a main retail anchor, poor retail layout, traffic circulation issues and ineffective marketing and promotion.

The Frodsham case study shows that without any substantial increase in the local population from new housing development, a partnership approach to town centre regeneration and effective marketing was able to help to deliver major improvements to the vitality and viability of a town centre.

Likewise the Ashbourne case study highlights the importance of maintaining an attractive environment and effective marketing and promotion to support town centre regeneration rather than the need for substantial new housing developments.

The lessons learnt from the 'Best Practice' guidance on how to improve the vitality and viability of town centres and the case studies of similar market towns elsewhere shows that housing growth is not a determining factor in revitalising town centres. To the contrary, there is a need to address other issues such as poor management, weak retail offer, poor environment and better marketing and promotion which are more important in improving the vitality and viability of town centres. The Council's strategy is therefore not evidence-based and it is unsound in approach in failing to address real factors relevant to town centre viability and viability. This is compounded by the Council's continuing failure to engage with the key stakeholders in the town centre or to assist in the promotion of town centre regeneration strategies and its repeated attempts to put forward inappropriate proposals which have been quashed by the Courts.

**3. The existing shopping patterns that result in significant leakage of expenditure to competing centres will not be reversed by housing growth due to the weakness of the existing retail offer and high level of out commuting.**

The SRCLS recognises the weakness of the existing retail offer within Tadcaster town centre. It is underrepresented in terms of both convenience and comparison goods

floor space, which account for 13% and 20% of the total floor space respectively, compared to 17% and 50% nationally. It is overrepresented in terms of service and ‘miscellaneous’ uses. These weaknesses will not be reversed by housing growth, let alone housing growth in inappropriate locations, but rather the existing pattern of unsustainable out-commuting will be further increased.

***Analysis of Market Share and Existing Shopping Patterns***

The weakness of the existing retail and leisure offer, together with the competition from nearby centres, results in the large leakage of expenditure from the town. This is evidenced by the Selby Household Survey undertaken in July 2009 to help inform the findings of the SRCLS. The promotion of new housing beyond Tadcaster’s requirements will do nothing to alter this pattern, but will only serve to increase unsustainable patterns of development.

***Table 3 Summary of Market Share retained within Tadcaster***

Market Share	Tadcaster
Convenience goods expenditure	49.6%
Comparison goods expenditure	9.0%
Leisure services expenditure	10.5%

*Source: SRCLS 2009*

A closer look at the data behind the headline market share figures above as set out in Appendix 2 of the SRCLS, and shows that Tadcaster is the main convenience shopping destination for both the main food and top-up food shop. The main leak of convenience goods spend goes to the Tesco, Tadcaster Road, York and Morrisons in Wetherby.

The majority of those surveyed (over 90%) use the private car as the main mode of transport for the main and top-up food shop, with over 30% visiting other destinations either before or after the main food shop. Tadcaster is the most popular destination.

In terms of the shopping destination for comparison goods, Tadcaster does not fair well, with only 9% of expenditure on comparison goods locally, with the main leakage

of spend going to York, Leeds and Wetherby. The only exception is chemist goods with 30% of spend retained in Tadcaster.

The preferred destination for leisure services is York for visits to the cinema, leisure centre, restaurants, bars/pubs, theatre etc. followed by Tadcaster for restaurants and bars/pubs.

A review of the travel to work patterns for Tadcaster as set out in the SDCS Background Paper No. 1 Analysis of Travel to Work Patterns shows that over 59% of residents commute out from the Tadcaster area, with Leeds and York being the most popular destinations.

The high incidence of out-commuting has implications for the viability and vitality of Tadcaster town centre. It will reinforce existing shopping patterns with large leakage of expenditure to competing centres.

It also has implications for new housing development. It must be assumed that the trend to work outside the area will continue with any new housing due to the location of employment uses outside the town. This will only further reinforce existing shopping patterns and negate any perceived benefit of housing growth to support the viability and vitality of Tadcaster as a local service centre, whilst further adding to unsustainable travel patterns.

It must also be assumed that the shopping patterns identified above will continue if new housing development at the scale proposed is delivered. This is due to the weak retail offer locally and high level of existing out-commuting, thereby negating the argument that housing growth will support the revitalisation of Tadcaster town centre and in fact supporting the point that new housing growth in peripheral locations is only likely to lead to a further increase in unsustainable travel patterns.

**4. The peripheral location of the proposed allocated housing sites will only serve to exacerbate existing shopping patterns and leakage of spend to competing centres.**

A proximity analysis illustrated in Figure 1 has been undertaken of some of the proposed allocated housing sites for Tadcaster identified in the Site and Policies Local Plan and supporting background papers.

This maps the 5 and 10 minute walk times from a central point located at the heart of the town centre on High Street. It very dramatically illustrates that the majority of the potential housing sites identified and which the Council appear to be contemplating as underpinning their strategy are located in excess of 10 minutes walking time from the town centre. This is beyond the maximum distance recommended by 'best practice' urban design guidance including the Urban Design Compendium.

It has been shown that people are generally prepared to walk for no more than 10 minutes (around 800 metres) before using the car. Consequently it is very likely that for housing sites located in excess of 10 minute walking time from the town centre, residents are likely to resort to trips by private car. This will only exacerbate existing shopping patterns and the continuing leakage of expenditure to competing centres, thereby undermining the vitality and viability of the town centre.

This view is supported by the 2005 Selby Strategic Development Framework Tadcaster Masterplan prepared by leading Urban Designers URBED. This recommended on page 95 that new housing development should only be built in the heart of the town centre.

b) The Sites and policies Local Plan should outline and provide a suite of policies for a robust and effective approach to reinvigorating the vitality and viability of Tadcaster. This approach should be formulated after proper stakeholder engagement, and it should be evidence-based and based on best practice and tailored to the specific issues and requirements of Tadcaster. The objector has repeatedly sought to work with the Council on such an approach but the Council has refused to engage properly with the objector despite its status as a key stakeholder.

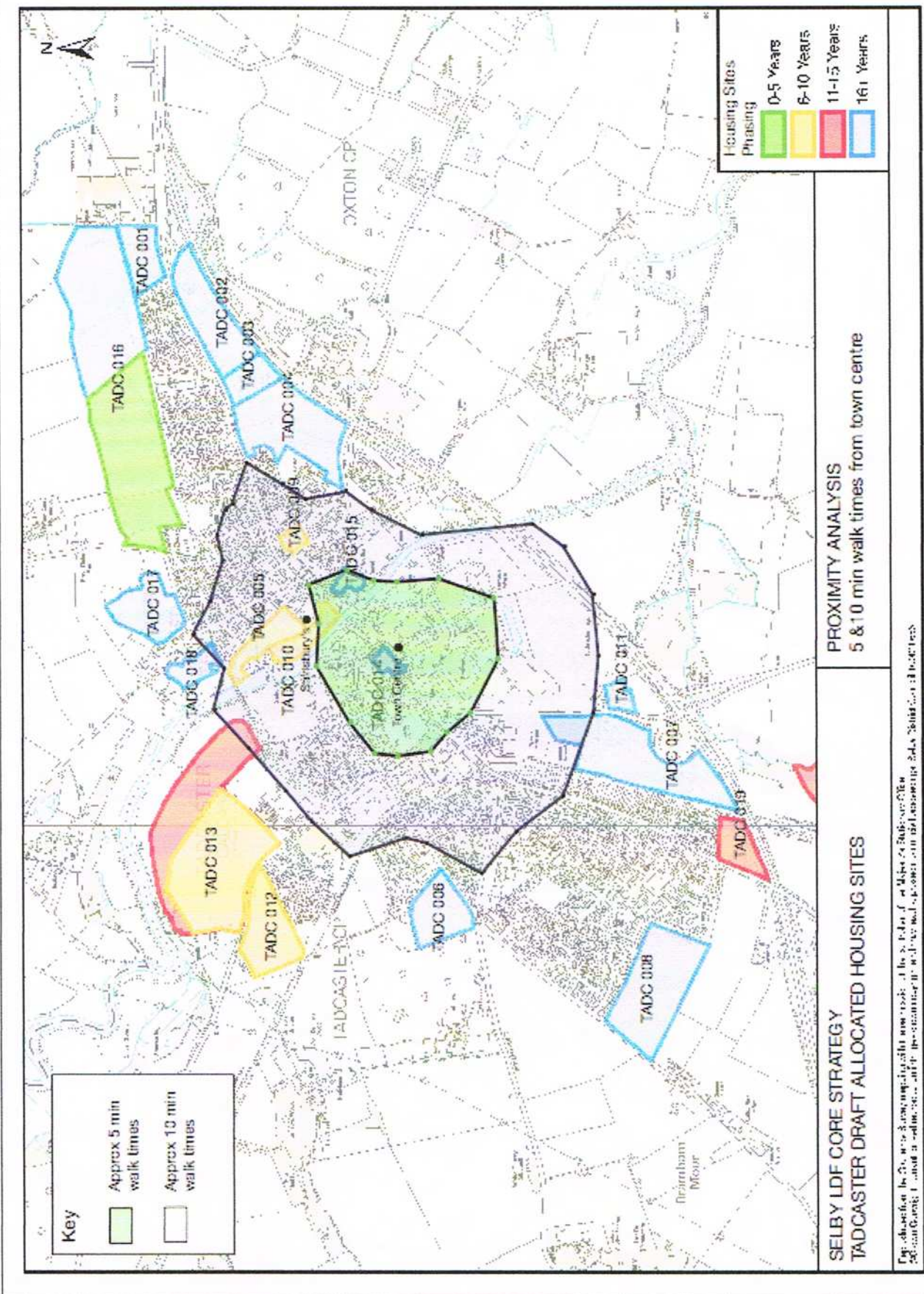
The strategy should include the following features:

- Reassessment of car parking needs and habits within the town centre to ensure the efficient use of land resources and appropriate parking facilities;



	<ul style="list-style-type: none"> <li>• The development of key town centre sites;</li> <li>• Development of residential uses close to the core of the town with limited parking provision in order to ensure;</li> <li>• An effective partnership between the District Council and landowners in delivering the strategy;</li> <li>• Physical improvement to the public realm;</li> <li>• Refurbishment of retail provision in the town centre along with sensitive residential refurbishments and conversions</li> </ul> <p>The above would reflect Best Practice. On the evidence available the objector has translated in to the attached Master Plan (Plan reference: CTP/1731/TCSTRAT/FEB 2012).</p> <p>The emerging Sites and Policies Local Plan should ensure that the correct policy approach to the regeneration of the town is supported by evidence, adopted and implemented to the benefit of the town.</p>
<p><b>Question 60</b></p>	<p>The addition evidence required in support of the emerging policy documents is set out in the individual representations above.</p>

Figure 1 Proximity Analysis of SHLAA sites relative to Tadcaster town centre



**Appendix 1 Summary of 'Best Practice' Guidance to support Town Centre Regeneration**

<b>Document Title</b>	<b>Summary Recommendations</b>	<b>Date published</b>
<p>The Portas Review - An independent review into the future of our high streets</p>	<ol style="list-style-type: none"> <li>1. Put in place a "Town Team": a visionary, strategic and strong operational management team for high streets</li> <li>2. Empower successful Business Improvement Districts to take on more responsibilities and powers and become "Super-BIDs"</li> <li>3. Legislate to allow landlords to become high street investors by contributing to their Business Improvement District</li> <li>4. Establish a new "National Market Day" where budding shopkeepers can try their hand at operating a low-cost retail business</li> <li>5. Make it easier for people to become market traders by removing unnecessary regulations so that anyone can trade on the high street unless there is a valid reason why not</li> <li>6. Government should consider whether business rates can better support small businesses and independent retailers</li> <li>7. Local authorities should use their new discretionary powers to give business rate concessions to new local businesses</li> <li>8. Make business rates work for business by reviewing the use of the RPI with a view to changing the calculation to CPI</li> <li>9. Local areas should implement free controlled parking schemes that work for their town centres and we should have a new parking league table</li> <li>10. Town Teams should focus on making high streets accessible, attractive and safe</li> <li>11. Government should include high street deregulation as part of their ongoing work on freeing up red tape</li> <li>12. Address the restrictive aspects of the 'Use Class' system to make it easier to change the uses of key properties on the high street</li> <li>13. Put betting shops into a separate 'Use Class' of their own</li> <li>14. Make explicit a presumption in favour of town centre development in the wording of the National Planning Policy Framework</li> <li>15. Introduce Secretary of State "exceptional sign off" for all new out-of-town developments and require all large new developments to have an "affordable shops" quota</li> <li>16. Large retailers should support and mentor local businesses and independent retailers</li> </ol>	<p>December 2011</p>

	<ol style="list-style-type: none"> <li>17. Retailers should report on their support of local high streets in their annual report</li> <li>18. Encourage a contract of care between landlords and their commercial tenants by promoting the leasing code and supporting the use of lease structures other than upward only rent reviews, especially for small businesses</li> <li>19. Explore further disincentives to prevent landlords from leaving units vacant</li> <li>20. Banks who own empty property on the high street should either administer these assets well or be required to sell them</li> <li>21. Local authorities should make more proactive use of Compulsory Purchase Order powers to encourage the redevelopment of key high street retail space</li> <li>22. Empower local authorities to step in when landlords are negligent with new "Empty Shop Management Orders"</li> <li>23. Introduce a public register of high street landlords</li> <li>24. Run a high profile campaign to get people involved in Neighbourhood Plans</li> <li>25. Promote the inclusion of the High Street in Neighbourhood Plans</li> <li>26. Developers should make a financial contribution to ensure that the local community has a strong voice in the planning system</li> <li>27. Support imaginative community use of empty properties through Community Right to Buy, Meanwhile Use and a new "Community Right to Try"</li> <li>28. Run a number of High Street Pilots to test proof of concept</li> </ol>	
<p>Action for Market Towns – Prosperous Places Strategy</p>	<p>The 'Prosperous Places' initiative promoted by Action for Market Towns provides a set of guiding principles and actions to help deliver a successful future for small towns including:</p> <ul style="list-style-type: none"> <li>• <b>Getting the basics right</b> with signage and car parking that attracts not deters</li> <li>• <b>Organising events</b> as a good way to get people in to town</li> <li>• <b>Creating an attractive public realm</b> to build on the unique sense of place in towns</li> <li>• <b>Knowing your customers through surveys and analysis to provide a</b> retail diversity to match the population</li> <li>• <b>Encouraging loyalty</b> to boost repeat business and help in targeting customers</li> </ul>	<p>August 2010</p>

	<ul style="list-style-type: none"> <li>• <b>Joint marketing</b> of individual towns by businesses and even a link up with neighbouring towns to create a destination for visitors.</li> <li>• <b>Monitoring success using systems such as AMT's</b> innovative online Town Benchmarking programme</li> <li>• <b>Learning from others</b> and transferring good practice through AMT's Towns-4-Towns scheme</li> </ul>	
<p>British Retail Consortium – 21<sup>st</sup> Century High Streets</p>	<p>The report sets out 20 key recommendations to achieve the best possible future for our High Streets drawn from current best practice.</p> <p><i>A unique sense of place</i></p> <ol style="list-style-type: none"> <li>1. Town centres are vital to local communities so we must work together to maximise the inherent advantages of each High Street's local heritage or natural surroundings whilst still providing facilities suitable for modern retailing.</li> <li>2. The retail mix must complement the public perception of a High Street's identity.</li> <li>3. High Streets must be marketed effectively – and deliver on that promise – so customers can appreciate the value of any given location.</li> </ol> <p><i>An attractive public realm</i></p> <ol style="list-style-type: none"> <li>4. Developing and maintaining an attractive trading environment, with consistent styling, is essential.</li> <li>5. Public spaces must be maintained to the highest standards with effective deterrents against pollution.</li> <li>6. Local authorities, public bodies and private interests must work together to achieve material improvements, and public sector investment must provide long-term benefits.</li> </ol> <p><i>Planning for Success</i></p> <ol style="list-style-type: none"> <li>7. Strategic planning must define the framework for different types of shopping destination within regional, sub-regional and local</li> </ol>	<p>July 2009</p>

contexts.

8. Partnership and collaborative working lie at the heart of all successful retail-led regeneration.
9. Monitoring the health of town centres should underpin any effective town centre system.
10. A clear strategy must be established to address increasing rates of vacancy and the accompanying decline in fortunes of some town centres.

#### Accessibility

11. Parking and transport policy should be seen as a way to attract customers to the High Street rather than simply a means of traffic management. It should aim to reduce town centre congestion and parking demands without affecting footfall. Incentives to use public transport should be offered, not penalties on motorists.
12. Car parks should not be used primarily as a means of raising revenue, and a proportion of funds raised should be ring-fenced to improve car parking options.
13. Retail delivery curfews should be reconsidered taking account of advances in technology.

#### Safety and Security

14. All retail crime and anti-social behaviour must be deterred, with damaged property and streetscape restored as quickly as possible.
15. Achieving meaningful deterrence requires a co-ordinated response by all agencies in the community.
16. Neighbourhood policing must meet the needs of the local business community.
17. A freeze on all new property and business rate burdens should be accompanied by the reinstatement of Empty Property Rate Relief.
18. The Business Improvement District (BID), or similar partnerships, should be the preferred mechanism for raising additional revenue to solve local problems.
19. The cost of complying with existing regulation should be immediately reduced, including the removal of any disproportionate parts of the regulations.

	20. Local authorities and the LBRO have a vital role to play in ensuring regulations are enforced without adding unnecessary costs.	
--	---	--

## Appendix 2 Town Centre Case Studies

### CASE STUDY 1: MATLOCK TOWN CENTRE

#### PROFILE

Matlock is located on the edge of the Peak District 10 miles from Chesterfield. The River Derwent divides the town in two. The main retail offer to the west of the river comprises a variety of independent shops and services on Dale Road, which is the main approach into the town centre from the south. The core of the town centre is located to the east of the river across Matlock Bridge at its junction with Crown Square. There remains a strong representation of independent local shops in this area alongside several national retailers including Somerfield and Wilkinson's. The main retail anchor Sainsbury is located on the edge of the town centre. The town also includes the offices of Derbyshire County Council and Derbyshire Dales District Council.

#### KEY FACTS

**Catchment Population:** Approx 34,000

**Distance from competing centres:** Derby 16 miles  
Chesterfield – 11 miles

**Housing completions 2000 – 2010:** Approx 450

#### Indicators of vitality and viability

Diversity of uses/floorspace:	2006		2010	
	Sq.m	%	Sq.m	%
Convenience:	5,110	19.1	5,810	21.9
Comparison:	9,850	36.9	8,840	33.3
Retail Services:	2,450	9.2	1,950	7.3
Leisure Services:	5,410	20.3	6,110	22.7
Financial and Business Services:	2,820	10.6	2,430	9.1
Vacancy rate:	1,060	4.0	1,420	5.3
Total floorspace	26,700	100	26,560	100
<b>Retailer requirements:</b>	13 (2006)		9	
<b>Zone A rents (sq.ft):</b>	£22-28		£25-30	
<b>Venue score ranking:</b>	786 (2005)		858 (2007)	

#### COMMENTARY

Matlock town centre's performance as a local service centre has been in decline in recent years, despite an increase in the local catchment population as evidenced by increasing vacancies, a reduction in retailer demand and a decrease in its ranking within the Venuescore Retail Index.

The local council has recognised the ongoing decline of the town centre over the last 5-10 years and together with its partners has implemented a programme of investment and improvement to help revitalise the town centre to include public realm and highway improvements and the development of new affordable housing within the town centre. However this investment has failed to stem the ongoing decline of the town centre. The Council commissioned the Matlock Town Centre SPD Retail Study in 2010 that identified the need to develop a major new retail scheme within the town centre alongside public realm improvements and better marketing to arrest its decline.



**CASE STUDY 2: FRODSHAM TOWN CENTRE****PROFILE**

Frodsham is situated in the Cheshire West & Chester authority area. The main shopping facilities are located at Church Street, Eddisbury Square, High Street and Main Street. The Morrisons foodstore anchors the village centre. Frodsham is identified as a village in the Vale Royal Local Plan and is not far from the settlement of Helsby, also identified as a village centre.

**KEY FACTS**

**Catchment Population:** Approx 16,000

**Distance from competing centres:** Chester 16 miles  
Northwich – 12 miles

**Housing completions 2000 – 2010:** Approx 100

## Indicators of vitality and viability

Diversity of uses/floorspace:	2000		2010	
	Sq.m	%	Sq.m	%
Convenience:	2,519	26.1	2,557	22.4
Comparison:	3,035	31.5	2,696	23.6
Retail service:	1,292	13.4	1,132	9.9
Leisure service:	956	9.9	3,306	28.9
Financial & business service:	1,046	10.9	1,451	12.7
Vacancy rate:	797	8.3	293	2.6
Total floorspace	9,644	100	11,435	100
<b>Retailer requirements:</b>	1		3	
<b>Zone A rents (sq.ft):</b>	£20-22		£20-25	
<b>Venuescore ranking:</b>	2095 (2007)		1961	

**COMMENTARY**

Frodsham is a small historic market town located some 16 miles from Chester. In 2000 it was suffering from problems which, whilst not severe, were of concern locally relating to weak retailer demand, increasing vacancies, static rents, increasing competition and leakage of spend to competing centres at Northwich and the Tesco at Helsby. The catchment of the area has remained relatively unchanged, with only limited new housing development over the last 10 years due to Greenbelt and land availability issues.

To address the issues experienced by the town and to improve its vitality and viability a number of initiatives were launched including the Frodsham Forward Initiative. This was a partnership of local businesses and key agencies set up to promote the regeneration of the town centre. It resulted in a number of projects, including a £3.2 million regeneration of the town park and the delivery of a £1.2m new 'one stop shop' for Council services to include new business space. A new loyalty card system has been launched to encourage local shopping and a number of festivals and a specialist markets are held throughout the year to promote the town.

### CASE STUDY 3: ASHBOURNE TOWN CENTRE

#### PROFILE

Ashbourne is a medium-sized market town with a resident population of 7,500 located at the southern edge of the Peak District, roughly equidistant between Stoke-on-Trent and Derby.

The Market Place is the main focus of the town centre with St John's Street and Church Street forming an attractive thoroughfare where many of the town's independent shops are located. The town centre also has a full range of local services and is a popular tourist destination with a number of restaurants, cafes and pubs catering for visitors and local residents. The town centre retail offer is anchored by the Shawcroft Centre, including national retailers Waitrose, Edinburgh Woollen Mill and a Coop foodstore. A medium sized standalone Sainsbury's store is located further south and the recently completed Waterside Retail Park, located approximately 0.7 miles to the south west of the town centre contains a number of retailers including M&S Simply Food, Homebase and Halfords.

#### KEY FACTS

**Catchment Population:** Approx 24,000

**Distance from competing centres:** Derby 13 miles

**Housing completions 2000 – 2010:** Approx 300

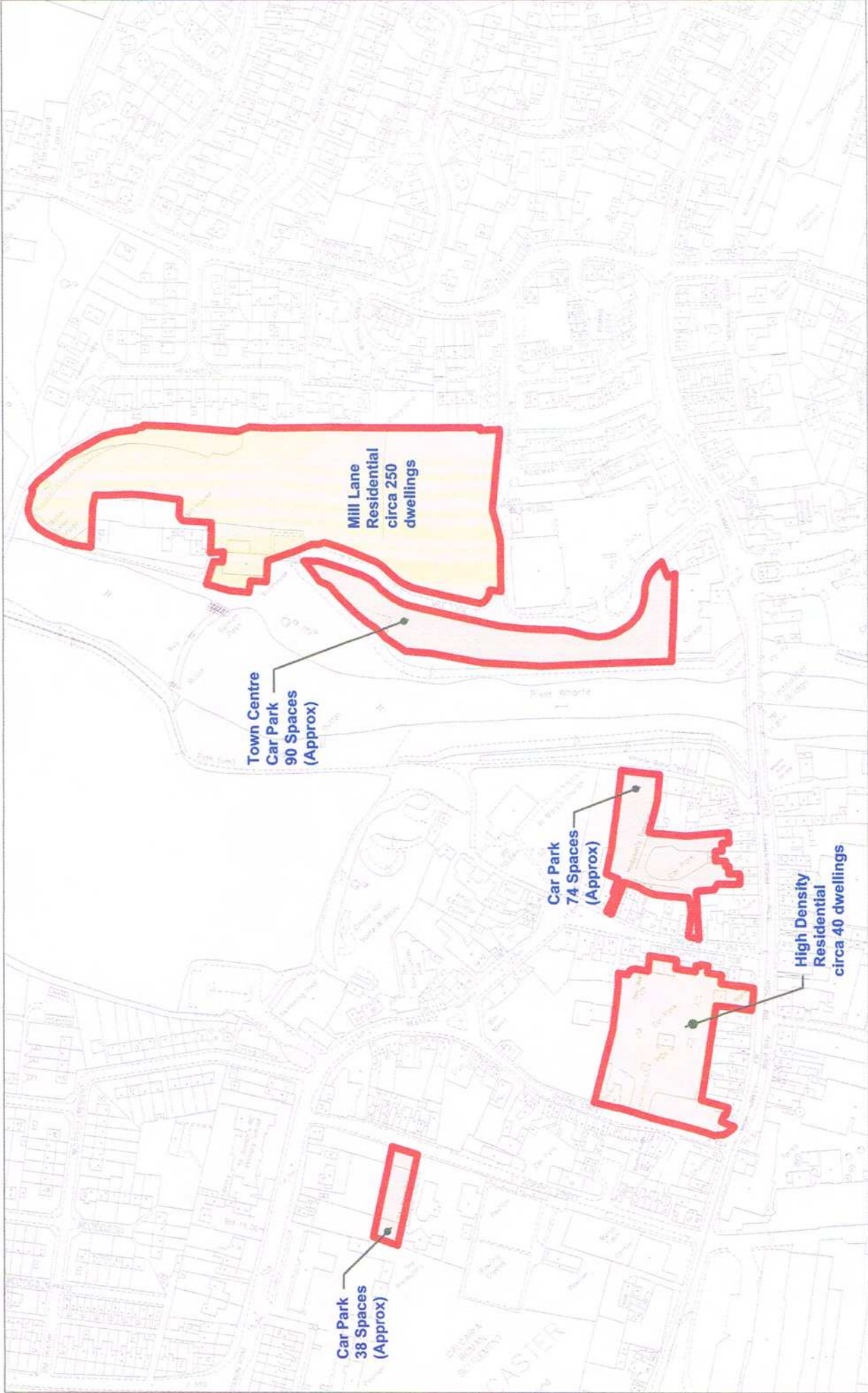
#### Indicators of vitality and viability

Diversity of uses/floorspace:	2003		2008	
	Sq.m	%	Sq.m	%
Convenience:	7,971	27.6	6,578	24.55
Comparison:	13,889	48.1	13,452	50.21
Service:	4,636	16.0	4,952	18.48
Miscellaneous:	372	1.2	297	1.11
Vacancy rate:	1,978	6.8	1,514	5.65
Total floorspace	28,846	100	26,793	100
<b>Retailer requirements:</b>	3		5	
<b>Zone A rents (sq.ft):</b>	£20-23		£20-25	
<b>Venue score ranking:</b>	894 (2005)		921	

#### COMMENTARY

Ashbourne town centre has been performing relatively well in recent years and, despite difficult economic conditions, has managed to improve its retail offer, increase demand from retailers for space and reduce its vacancy levels.

The potential for housing growth to strengthen the local catchment has been limited and the focus has been to complement targeted improvements to the public realm and highways, with strong leadership through the Ashbourne Partnership and effective marketing to include a successful loyalty card scheme and regular festivals and events. This has proved successful despite limited housing development.



DrawingNo: CTP/1731/TCSTRAT/FEB2012 (C)

Drawing Title: Tadcaster Town Centre Strategy