

Selby District Local Plan
Site and Policies: Interim Consultation
Draft Employment Land Review

Written Statement by Barton Willmore on behalf of
Harworth Estates

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

- a. analysis of the economy and commercial markets?**
- b. functional economic areas identified?**
- c. availability of the sites set out in Figure 1.3 of the Executive Summary (Figure 3.4 of the main report)? (See note after Q2 (ELR) d)**
- d. conclusions, and the basis for the conclusions, on the allocation/de-allocation of the sites set out in Figure 1.3 of the Executive (Figure 3.4 of the main report)? (Appendices 1, 2, 3a and 3b of the ELR main report set out all the sites which were assessed as part of the study, The conclusions are based on a high level assessment of supply and makes recommendations in terms of which sites should be carried forward taking into account the balancing of predicted demand and supply of employment land)**
- e. other conclusions/findings of the study.**

4.1 As highlighted in previous representations made on behalf of the Client, the opening paragraphs of the Core Strategy set out the key issues and problems that the Council recognises will need to be adequately addressed through suitable policies in order to achieve the overall vision for the District. This includes the statement at paragraph 2.59 which makes it clear that;

“Reinvigorating and developing the economy of the District has emerged as a major priority if a more self-contained, sustainable way of life for District residents is to be created. The Core Strategy aims to facilitate economic recovery in Selby, through the retention and creation of new jobs in line with local aspirations, and by ensuring the District continues to be attractive to investment”.

4.2 Our Client’s previous representations went onto express concerns that the figures (37-52 hectares) included within the adopted Core Strategy, and subsequently within the Initial Consultation draft of the PLAN Selby document, were based on figures from a 2010 ‘Employment Land Refresh’. This document was simply an update of data and did not represent a full employment land review. In this instance the document clearly concluded (at paragraph 7.9) that it was not possible on the basis of the data and evidence available at that stage to identify the exact quantum of land required. Clearly, this document was significantly out of date and therefore should not be relied upon as part of a robust evidence base. A stance acknowledged within the Core Strategy at paragraph 6.14.

4.3 With this in mind, our Client welcomes the opportunity to review and comment upon a new Employment Land Review (ELR) document carried out by GVA Grimley Ltd and designed to form an integral part of the evidence base for emerging policy. Although in draft, comments are invited on the range of factors considered, the methodology applied, and the overall conclusions.

Comments on the Baseline Review

Planning Policy and Strategy

4.4 The ELR starts off by providing a review of relevant national, regional and local policy and guidance documents.

4.5 The following documents are of relevance yet are not referred to in the planning policy and strategy section:

- NPS and Strategic Rail Freight Interchange Guidance
- Logistics Growth Plan
- Plan for Growth;
- Regional Policy and evidence base e.g. Regional Freight Strategy for Yorkshire and Humber; and
- The Northern Powerhouse: One agenda, one economy, one north – a report on the northern transport strategy.

4.6 The draft ELR does not refer to paragraph 21 of the NPPF which provides specific guidance on factors to be considered when undertaking an ELR and the nature of ELR outputs as follows:

“In drawing up Local Plans, local planning authorities should:

- **Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;**
- **Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipate needs over the plan period;**
- **Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough accommodate needs to not anticipate in the plan and to allow a rapid response to changes in economic circumstances;**

- **Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;**
- **Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and**
- **Facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.”**

4.7 These are considered to be a key omissions from the draft ELR and should be included on the basis that it sets the context and scope of what the ELR should comprise.

4.8 Reference is also however made to Local Enterprise Partnerships (LEPs) and the important role they can play in driving forward economic growth. The main points raised that have been used to influence these representations are detailed for reference below.

The Leeds City Region LEP

4.9 The ELR highlights that Selby is located within the Leeds City Region LEP ('the Leeds LEP'). The document acknowledges that the Leeds City Region is the largest City Region economy outside the County's capital, London, and therefore has the potential to become an economic powerhouse. In order for this overarching vision to be achieved, plans are in place through the Leeds City Region Strategic Economic Plan (SEP), agreed with government in July 2014, to deliver an additional £5.2 billion in economic output and extra 62,000 jobs in the region by 2021. These are clearly ambitious targets.

4.10 We note that the SEP identified Selby as Strategic Growth Centre within the City Region.

4.11 The ELR also explains that direct contact has been made with the Leeds City Region who have acknowledged the following in relation to the Selby district:

- **“Selby is an important component of the Leeds City Region economy;**
- **Selby is well positioned to contribute to the drive for more and better jobs;**
- **One of the key ambitions is to be build a highly resource-efficient economy and Selby is deemed to be well placed to assist with meeting this ambition through their strength in energy supply;**
- **Selby has excellent transport links which are also a driver for the thriving transport and storage sector which employment is more than twice the national average...the main sectors being manufacturing and education;**

- **A need for continued support for larger businesses to expand through land/property availability, capital investment, recruitment and skills and supply chain development.”**

4.12 It is clear that the Leeds LEP regards Selby as being able to play an important role in being able to fulfil its ambition of creating an economic powerhouse. This is welcomed by our Client and it is important that the assets Selby currently has at its disposal are fully realised and utilised. Our Client is keen to ensure that this stance is reflected within the emerging Selby Local Plan policy documents and associated evidence base.

The York, North Yorkshire and East Riding (YNYER) LEP

4.13 The ELR acknowledges that one of the key priorities of the YNYER LEP is to create a "*well connected economy*". In respect of Selby directly, it highlights that the YNYER LEP identifies that the A1/A19 Growth Corridor is one of our Core Activity areas and Selby is identified as a growth town.

4.14 Discussions between GVA and the YNYER LEP have highlighted that that the YNYER LEP consider bio-economy, renewable and logistics as the main sectors within Selby. The YNYER also sees Selby as "*an area capable of accommodating growth due to connections to motorways and limited constraints to development like landscape designations that are an issue in the other areas of the LEP.*"

4.15 It is also noted that the YNYER LEP have referred to a requirement "*for a better relationship between economic development and planning and a key focus on working with landowners.*"

4.16 Our client supports and concurs with all of the above comments made by the Leeds and YNYER LEPs in respect of the advantages and opportunities that the Selby district offers. In addition our Client's agent Colliers have specifically noted that Selby is very well positioned in terms of demand for employment within the York area. They have confirmed that they regularly receive requirements for the York area which cannot be met due to Green Belt and/or other constraints.

The Selby Economy

4.17 We note with interest that the employment data provided shows that strong employment performance is expected within Selby, which has consistently seen strong employment rates above those of the region and national averages.

- 4.18 It also noted that a number of manufacturing sub-sectors including some distribution activities are increasing value to the economy.
- 4.19 Selby's economy is clearly outperforming the regional and national economies in respect of FTE employment and GVA and this needs to be reflected and taken account of in the Selby PLAN going forward.

Commercial Market Analysis Headlines

- 4.20 A review was also undertaken of the existing property market. However this analysis focussed on the main commercial sectors within use classes B1, B2 and B8 with particular emphasis on Selby, Tadcaster and Sherburn in Elmet. We note that it is acknowledged that the findings reflect a '*point-in-time*' review of the market and this is an important recognition.

National Perspective

- 4.21 In respect of the national perspective of the commercial property market, the ELR highlights at paragraph 2.99 that "*the industrial sector has been leading the growth in new development starts, with new construction orders increasing.*"
- 4.22 Paragraph 2.101 goes on to highlight that "*continuing strong increases in commercial and industrial development are likely for many years to come, based on past evidence*". Our Client concurs with this view together with the identification that greater amounts of development and interest will come forward in the main commercial sectors going forward. In particular the recognition that demand in the logistics warehouse sector will remain very strong and multi-let industrial estates have seen increased demand.
- 4.23 Finally, in relation to the supply of quality employment sites, paragraph 2.113 states that "*there continues to be a strong preference for quality sites in good locations benefiting from good connectivity, particularly to the strategic road network.*" Again our Client concurs with this view.

Local Perspective

- 4.24 At a local level, the ELR advises that number of property agents and developers were consulted to provide a qualitative overview of the commercial property market in the Selby

District. This was limited to four agents; McBeath Property Consultants, Briggs Burley, GVA and Knight Frank.

- 4.25 Our Client recognises the importance of approaching agents and developers to get a '*real world*' perspective on the local property market. It is noted however that only a very limited number of agents were approached. Whilst stating that developers were also contacted none are referenced. In addition, whilst a summary of the responses is provided by the limited number of agents, a full transcript is not provided. As such, the limited analysis and evidence made available isn't considered to provide a thorough and transparent representation of the local property market.
- 4.26 As such the draft ELR would benefit from further consultation with a wider range of agents including those most active in the Selby market as well as local developers. Direct consultation with landowners (e.g. workshops and/or meetings) should also take place in order for the ELR to be robust.
- 4.27 Notwithstanding this, paragraph 2.131 however confirms that the general consensus amongst agents was "*that the local property market is stable and relatively resilient in a long term context*". With regards to the scope for future development, the agents suggested that the "*road connectivity was key and development along the main arterial routes (including the motorway network) linking Selby District to key regional and sub-regional towns and cities, was vital*."
- 4.28 In preparation of these representations, Barton Willmore has made contact with a leading property agent, Colliers who are very active in the Selby market as well as our client Harworth Estates. Both have reviewed the ELR and have a number of comments. For example, they agree that the local property market is currently stable. Likewise they have noticed fluctuations in the market. A full breakdown of the comments raised by the agent is appended to this note at **Appendix 1**.
- 4.29 Unsurprisingly, paragraph 2.139 highlights that one particular agent also perceived that there was significant amounts of employment 'leakage', residents of the district travelling to neighbouring districts to work, most notably the City of Leeds. As highlighted in previous representations on behalf of our Client, the Council themselves acknowledge the significant levels of out-commuting and moderating unsustainable travels patters is a key challenge for the District. Our Client would again stress the fact that this issue is likely to continue unless sustainable provision is made for additional employment opportunities within the District. Increased and greater self containments of economic activity in Selby should be seen as the foundation upon which the overall objective of self sufficient can be built.

4.30 Colliers have also highlighted that they are experiencing significant demand for new property within the neighbouring district of York. However, given the considerable Green Belt designation that surrounds York opportunities to fulfil this requirement are limited. Selby therefore represents the perfect opportunity to fulfil this need through the provision of for high quality employment land given it isn't constrained by a Green Belt designation to the same extent. There is no recognition of this fact within the ELR and this represents a shortfall in the overall assumptions.

Employment Land Supply

4.31 Section 3 of the ELR carries out an assessment of the supply of employment land across the Selby District both in qualitative and quantitative terms, in line with national guidance. The opening paragraphs of section 3 explain that consideration has been given to existing allocations within the development plan, windfall sites with extant planning permission and also additional sites that have been put forward in the call for sites exercise conducted in 2013.

Identification of Sites

4.32 The remaining sites identified are then assessed via detailed site assessments. The assessment methodology is set out from paragraph 3.7 and considers the suitability, availability and achievability of each site, in line with national guidance contained within the PPG.

4.33 We have a number of concerns regarding the assessment methodology which are set out below.

4.34 Paragraph 3.13 sets out the criteria that are to be used during the assessment of each of the sites. The more detailed approach is set out at Appendix 4. We note that the majority of these assessment criteria are based on the guidance advocated by the NPPG and appear to be robust. The exceptions being the last two 'Strategic Planning Criteria' criterion which take account of:

- 1) **Importance to LEP Strategy** – whether a site by virtue of its scale, nature, location and characteristics is a site of importance to LEP Strategy or a business support priority/RGF funding priority (defined as being a focus on priority sites/locations – Olympia Park and Sherburn Industrial Estate); and

2) **Strategic Sites** - whether a site is classed as 'strategic' in the Core Strategy (i.e. Olympia Park) and proximity to this site.

- 4.35 The 'importance to LEP strategy' category is not considered to be robust and there is doubling up of scoring with the second 'strategic sites' category i.e. some sites are scored highly under both categories on the basis of them being located close to Olympia Park. We comment further on scoring sites on this basis below. The likelihood of sites securing RGF funding cannot, and has, not been accurately predicted by the Council or GVA. For example all of our Client's sites have been given a score or 1 'not likely'. This fails to take account of Harworth Estates proven track record in securing and utilising funding to bring forward development, the scale of their landholdings, the significant industrial assets on our their sites and industry knowledge of what we can offer on our landholdings. As such scoring based on this category is unreliable and not a sound approach.
- 4.36 Turning to the final scoring criteria, as the ELR acknowledges, the only strategic employment site within the Core Strategy is Olympia Park. This means that the only site that can score the maximum number (5) is Olympia Park. Accordingly, all other sites put forward, regardless of their attributes will be immediately scored down in the scoring matrix.
- 4.37 Furthermore, the scoring matrix suggests that a score of 3 is given if the site is in close proximity to Olympia Park. Again, no justification for why this is beneficial is provided. In fact, in respect of the site identified as ES3 – Land East of Bawtry Road, we note that despite being in close proximity to Olympia Park and therefore given a score of 3 in the matrix, within the summary of site recommendations (Figure 3.4) it is intimated that there "*may be limited demand due to proximity to Olympia Park and Access 63 on A63 Corridor*". On the one hand, the ELR adds weight to the fact that sites are located in close proximity to Olympia Park and on the other it raises concerns that demand for such sites might be impacted upon due to proximity. As such there are clear inconsistencies in the approach and the robustness of the site scoring/methodology is questionable.
- 4.38 It is perverse to suggest that only sites that are located close to Olympia Park should be allocated for employment development (based on them achieving higher scores than sites elsewhere within the district). The Local Plan should plan for employment needs across the entire district and should recognise that a range of sites will be required in a range of locations and within the various Functional Economic Areas. This criteria does not reflect the wider acknowledgement in the draft ELR and the Council's adopted Core Strategy that employment development will also need to take place within other settlements, including rural parts of the District. This is due in part to the nature of the employment development

that will need to be created but also in terms of accessibility. It would appear therefore that this criteria has been used to ensure that Olympia Park is scored highly.

4.39 Further to the above, this criteria should be excluded from the site assessment criteria as it is not sound and it does not accord with national planning policy.

4.40 In addition to the removal of the above criteria, it is considered that two further criteria should be included as follows:

- 3) **Economic Regeneration Category** – The identification of priority areas for economic regeneration is one of the key factors to be considered when undertaking an ELR and nature of ELR outputs (see paragraph 21 of the NPPF). Furthermore given that one of the key objectives of the Selby Core Strategy is to support rural regeneration it is clear that this should be a criteria upon which sites are assessed against in terms of their ability to achieve regeneration.
- 4) **Compatibility of Adjoining Uses** – e.g. a poor score would result from adjoining residential or other sensitive uses whilst a high score would result where a site is not located in close proximity to incompatible surrounding uses.

4.41 Notwithstanding the above, we have major concerns about the robustness and correctness of the assessment of the individual sites that has been carried out against the assessment criteria.

4.42 Whilst we note that the scores for each site are provided within the table appended to the ELR at Appendix 2, this simply presents the final aggregate score. There is no justification or explanation provided within the ELR as to how the scores have been derived as this raises serious questions about the transparency of the evidence base. Contact has therefore been made direct to policy officers within the Council and this information has now been provided to us. It would however have been beneficial for this information to have been provided at the start of the consultation exercise. We trust that the full breakdown will be included within the ELR going forward.

4.43 On behalf of our Client, and using assessment criteria and scoring matrix outlined at Appendix 4 of the ELR, we have undertaken our own assessment of each of our Client's sites that make up their landholdings within District. The results of this assessment are set out in detail at **Table 4.1** below.

Table 4.1 Assessment of Harworth Estates' Landholdings within Selby

	Kellingley Site		Barton Willmore (BW) Comments
Ownership & Land Owner Intentions			The site is solely within the ownership of our Harworth Estates. With the closure of the colliery expected towards the end of 2015, our client to promote the site for employment uses.
Flood Zone	FZ1		No comments
Barton Willmore / ELR Score	BW	ELR	
Availability (timescale)	3	1	The ELR gives the site a score of 1 based on the assumption that it has long-term or no availability. Although the site is currently an active colliery, this use is set to cease in the short term (within the next 6 months) at which point the site will available for development. BW considers the site to have short to medium availability and therefore a score of 3.
Market activity / developer interest	3	1	Although the site itself has not been actively marketed by the landowners given the established use, there has been interest from a range of potential future occupiers. In most instances, the interest in the site has been centred around the existing rail and canal infrastructure. Likewise there has been interest in the site from a number of potential investors. Given this interest, in line with the matrix, a score of 3 is more appropriate.
Site Constraints (physical)	4	2	The ELR highlights that the site is currently in use, is occupied by spoil heaps, power lines and significant contamination. On this basis, a score of 2 is given – individual significant development constraint. The site does not have any significant constraints. Access is readily available and built to industrial standards and the site also benefits from access by rail and canal. The topography of the site is fairly regular. The overhead power lines on site only affect a very small part of the site. The railway lines are an asset and the site should not be scored down on the basis of them being a constraint. As such, a score of 4 is more appropriate.
Planning Policy Constraints	5	5	No comments
Strategic accessibility	5	3	Given the site's location off the A645, the scoring matrix gives the site a score of 3. There is however no recognition of the site's rail connectivity which has the potential to provide national accessibility. A rail connection is provided with the Knottingley to Goole railway immediately

			to the east of the site. The Trans-Pennine route to Manchester and Liverpool is also directly accessible via Kottingley and Wakefield. Through these connections it is therefore possible for retains to directly access practically any location on the UK rail network. In addition the site benefits from a canal wharf to the Aire and Calder canal which runs from Leeds to Goole and allows for barge transport from a number of locations within the region including Leeds, Rotherham, York and Hull. On this basis, we consider the site has been underscored and a score of 5 is more appropriate.
Site and/or premises conditions	2	1	The site scores 1 which means the significant / complicated clearance work is required. Some clearance works will be required (e.g. colliery structures) but not in excess of 75% of the site. A score of 2 is more appropriate.
Location & Quality of surrounding environment (i.e. proximity to services)	4	3	This score fails to have regard to the fact that the site is located close to the edge of the town of Knottingley as identified in Wakefield's Core Strategy. Accordingly the site should be scored 4 for this category.
Previously developed land/Greenfield	4	4	No comments
Public transport accessibility	4	2	The site is located on the edge of the town of Knottingley. Accordingly the site should score 4.
Accessibility by walking and cycling	4	4	No comments
Suitability for employment development	5	5	No comments
Planning Context	4	2	The site currently a consented employment generating use and a history of such use therefore a score of 4 is considered more appropriate on the basis that the site is not a vacant/undeveloped site with history of employment or employment generating uses.
Importance to LEP strategy likelihood of securing RGF funding	3	1	See our comments about the validity of this criterion.
Strategic Sites	1	1	See our comments about the validity of this criterion.
Assessment Total			
ELR Assessment Score	35		
Barton Willmore Assessment Score	52		

	Gascoigne Interchange Site		Barton Willmore Comments
Ownership & Land Owner Intentions			The site is solely within the ownership of our Client who are actively promoting it for employment uses.
Flood Zone	FZ1, 2 and 3a		No comments
Barton Willmore / ELR Score	BW	ELR	
Availability (timescale)	5	1	The comments provided to justify the score of 1 acknowledges that there is an established use on part of the site. Despite this, the ELR gives it a score of 1 – long term or not available. This is strongly disputed by our Client and as demonstrated above, and previous representations, the site is immediately available, is in use and is being marketed and therefore score of 5 is more appropriate.
Market activity / developer interest	5	5	No comments
Site Constraints (physical)	4	2	The comments suggest that contamination is likely. There is no evidence to support this. Likewise, the comments also suggest that the rail infrastructure is regarded as a constraint. This is clearly not the case and should be regarded as a significant asset of the site which has been recognised by Secretary of State. As such, a more appropriate score is 4 – not significant development constraint.
Planning Policy Constraints	5	4	There are no planning policy constraints which would prevent the site from accommodating further development. In line with matrix, a score of 5 is more appropriate.
Strategic accessibility	5	1	The scoring matrix currently allocates the site a score of 1. It would appear that no regard has been given to the existing rail and road infrastructure that already services the site, a legacy of the sites former use. The site is well located for vehicular traffic being close to the strategic road network including J42 of the A1 (M) via B1222/A162 providing access to both the M1 and M62 motorways. The site has exceptional railway connections both south and north for the East Midlands Coast Main Line and to the west for the Trans-Pennine route. A score of 5 is therefore more appropriate.
Site and/or premises conditions	4	3	Only very limited clearance if any would be required.
Location & Quality of surrounding environment (i.e. proximity to services)	4	4	No comments
Previously developed land/Greenfield	3	3	No comments
Public transport accessibility	2	2	No comments
Accessibility by walking and cycling	1	1	No comments

Suitability for employment development	5	3	Approximately 50% of the site is already occupied by existing employment uses and has proven demand for such uses. The site has excellent road and rail connectivity. The proximity to commercial uses is an advantage of the site not a disadvantage. The site is located away from main residential areas and is therefore well suited for employment uses. As such it is considered that the site has good / strong suitability for employment development and therefore should be scored 5 for this criteria
Planning Context	4	2	The southern half of the site already has planning permission and accommodates a number of employment generating uses. In line with the matrix a score of 4 is more appropriate.
Importance to LEP strategy likelihood of securing RGF funding	3	3	See our comments about the validity of this criteria.
Strategic Sites	1	1	See our comments about the validity of this criteria.
Assessment Total			
ELR Assessment Score	35		
Barton Willmore Assessment Score	51		

	Riccall Site		Barton Willmore Comments
Ownership & Land Owner Intentions			No comments
Flood Zone	FZ1		No comments
Barton Willmore / ELR Score	BW	ELR	
Availability (timescale)	5	3	The site already has planning permission for employment development and the majority of the units on the site are now occupied. As such, contrary to the what the ELR states, the site is immediately available – score 5
Market activity / developer interest	5	5	No comments
Site Constraints (physical)	5	5	No comments
Planning Policy Constraints	5	3	The comments provided to justify the score state that the site is located outside settlement boundary and that there is a SSSI to the east. As noted above, the site already benefits from planning permission for employment development and is in use. As such, these factors are not considered to represent significant constraints. As such a score of 5 is more appropriate.
Strategic accessibility	3	3	No comments
Site and/or premises conditions	3	3	No comments
Location & Quality of surrounding environment (i.e. proximity to services)	2	2	No comments
Previously developed land/Greenfield	3	3	No comments

Public transport accessibility	1	1	No comments
Accessibility by walking and cycling	4	4	No comments
Suitability for employment development	5	5	No comments
Planning Context	4	2	A large part of the site is subject to an extent planning permission which allowed for the retention and reuse of buildings, landscaping and infrastructure under the reference 2006/0040/REF. A score of 4 is therefore more appropriate for this site.
Importance to LEP strategy likelihood of securing RGF funding	3	1	See our comments about the validity of this criteria
Strategic Sites	1	1	See our comments about the validity of this criteria
Assessment Total			
ELR Assessment Score	41		
Barton Willmore Assessment Score	49		

	Whitemoor Site		Barton Willmore Comments
Ownership & Land Owner Intentions			No comments
Flood Zone	FZ1		No comments
Barton Willmore / ELR Score	BW	ELR	
Availability (timescale)	5	3	As noted in the comments provided within the ELR, part of the site already is occupied by development. The remaining parts of the site have been actively promoted by the landowners are therefore immediately available for development. A score of 5 is therefore more appropriate.
Market activity / developer interest	5	5	No comments
Site Constraints (physical)	5	3	The comments provided indicate that the site is subject to a number of constraints and therefore allocate a score of 3. These alleged constraints include contamination, concerns about access and topography. However, as noted above the site is an established business park. In the case of contamination, there is no evidence to suggest that would impact on the deliverability of the site. As such, a score of 5 is more appropriate.
Planning Policy Constraints	5	4	The comments highlight that the site is located outside of a settlement boundary, that there is a SSSI to the north and east and that part of the site is designated as Land for Storage & Distribution of Agricultural products (Policy RIC/1). However, as noted above the site is already an operational business park. These planning constraints are not considered sufficient to significantly impact on the delivery of the site

			and therefore a score of 5 is more appropriate.
Strategic accessibility	3	3	No comments
Site and/or premises conditions	5	1	The comments state that the majority of the site is considered necessary and therefore allocate a score of 1 in line with the matrix. However, as noted above the site is now occupied by an operational business park which utilises the existing buildings on site. The comment stating that the majority of the site requires clearance is therefore in correct and a score of 5 is more appropriate.
Location & Quality of surrounding environment (i.e. proximity to services)	2	2	No comments
Previously developed land/Greenfield	3	3	No comments
Public transport accessibility	1	1	No comments
Accessibility by walking and cycling	1	1	No comments
Suitability for employment development	5	5	No comments
Planning Context	4	4	No comments
Importance to LEP strategy likelihood of securing RGF funding	3	1	See our comments about the validity of this criteria
Strategic Sites	1	1	See our comments about the validity of this criteria
Assessment Total			
ELR Assessment Score	37		
Barton Willmore Assessment Score	48		

	Stillingfleet Site		Barton Willmore Comments
Ownership & Land Owner Intentions			No comments
Flood Zone	FZ1		No comments
Barton Willmore / ELR Score	BW	ELR	
Availability (timescale)	5	3	The comments claim that remediation of the site is required and is scored 3 the basis of "lots of clearance required". However this is not the case therefore the site should be scored 5.
Market activity / developer interest	3	1	Landowner has had interest in the site.
Site Constraints (physical)	3	1	Contamination identified yet there is no evidence of this. Constraints cannot be considered to be significant and therefore a score of 3 is more appropriate.
Planning Policy Constraints	4	4	No comments
Strategic accessibility	1	1	No comments
Site and/or premises conditions	3	1	Only some clearance required.
Location & Quality of surrounding environment (i.e. proximity to	1	1	No comments

services)			
Previously developed land/Greenfield	4	3	The majority of the site is previously developed and therefore a score of 4 is more appropriate.
Public transport accessibility	1	1	No comments
Accessibility by walking and cycling	1	1	No comments
Suitability for employment development	5	3	The majority of the site is considered to be suitable for employment development given the limited number of constraints, the site's existing infrastructure and the intentions of the landowner. As such a score of 5 is more appropriate.
Planning Context	2	2	Recognition should be given to the site's historic employment generating use.
Importance to LEP strategy likelihood of securing RGF funding	3	1	See our comments about the validity of this criteria
Strategic Sites	1	1	See our comments about the validity of this criteria
Assessment Total			
ELR Assessment Score	24		
Barton Willmore Assessment Score	37		

	Wistow Site		Barton Willmore Comments
Ownership & Land Owner Intentions			No comments
Flood Zone	FZ1		No comments
Barton Willmore / ELR Score	BW	ELR	
Availability (timescale)	5	3	Contrary to the score given, our Client considers that this site should be considered to be available in the short term. A score of 5 is therefore more appropriate.
Market activity / developer interest	3	1	The comments state that there has been no evidence of marketing of the site and as such a score of 1 is awarded. However, the landowner has had interest in the site from a number of potential occupiers. As such, a score of 3 is more appropriate in line with suggested scoring matrix.
Site Constraints (physical)	4	3	The comments states that there are trees around the site, there is likely to be contamination issues and an upgrade is required to the access. However, contrary to the comments contamination on the site is not a significant constraint nor are the trees. As such, a score of 4 is more appropriate in this instance.
Planning Policy Constraints	4	4	No comments
Strategic accessibility	1	1	No comments
Site and/or premises conditions	1	1	No comments

Location & Quality of surrounding environment (i.e. proximity to services)	1	1	No comments
Previously developed land/Greenfield	5	3	Contrary to the comments provided, the site is in fact Brownfield. In line with matrix, a score of 5 should be given.
Public transport accessibility	1	1	No comments
Accessibility by walking and cycling	1	1	No comments
Suitability for employment development	5	5	No comments
Planning Context	2	2	Recognition should be given to the site's historic employment generating use.
Importance to LEP strategy likelihood of securing RGF funding	3	1	See our comments about the validity of this criteria
Strategic Sites	1	1	See our comments about the validity of this criteria
Assessment Total			
ELR Assessment Score	28		
Barton Willmore Assessment Score	37		

- 4.44 Table 4.1 above clearly demonstrates that there are significant discrepancies between the scoring of the Sites within the ELR and how our own scoring of the Sites against the assessment criteria that has been applied. Given that the individual site scores are then used to determine the overall suitability of each site for an employment allocation, it is critically important therefore that the site scoring assessment is carried out on a sound and robust basis and not simply based on assumptions.
- 4.45 We have concerns regarding the robustness of an aggregate site scoring approach and advise that a traffic light system would be more appropriate. Indeed the ODPM's ELR Guidance at paragraph 4.31 recommends avoiding aggregate scoring systems, as *'they are very susceptible to slight changes in assumptions'*. This has been demonstrated through our own scoring of sites as set out above. Furthermore an aggregate scoring system given the impression of an exact science and should not be used in a prescriptive manner.
- 4.46 We also note that there is no weighting of any criteria. It should be noted that market conditions and land owner intentions often present issues that cannot be overcome and therefore are overriding factors in terms of the potential for sites to be brought forward and delivered for employment purposes.
- 4.47 Elements of the scoring matrix are factually incorrect and therefore unless addressed will mean the PLAN Selby document is prepared on an inaccurate basis and accordingly it would not be sound. Notwithstanding our concerns regarding the use of an aggregate scoring system, if this approach is to be retained, our Client strongly advises that revisions are made to the scoring of the Sites at the earliest opportunity to ensure the PLAN Selby document is based on a sound and accurate evidence base.

Current Employment Land Supply

- 4.48 National planning policy makes clear that existing employment allocations should not be simply be rolled over into new Local Plans, where there is no prospect of them being used for that purpose. Accordingly, we support the recommended de-allocation of a number of existing employment sites which are not likely to come forward, and/or are subject to constraints, and/or lack or landowner intention to deliver, or have been largely built out.
- 4.49 In addition we provide detailed comments on the sites which are either proposed to be retained, or potentially retained.

Olympia Park, existing allocation – E1

- 4.50 It is noted that Olympia Park is the only site considered that is identified as being likely to appeal to national occupiers. However as set out elsewhere in these representations the Gascoigne Wood and Kellingley sites would also appeal to national occupiers given their credentials and this should also be identified.

East of Bawtry Road, existing allocation – ES3

- 4.51 ES3 is located within the principal town of Selby and is currently allocated for employment development within the 2005 Local Plan under BRAY/2. The total allocation equates to 1.6 hectares and despite its location, it is acknowledged within the ELR assessment that no development has taken place on the site and there are no extent planning permissions. A previous consent on the site for a mixed use development was not implemented and has now lapsed.
- 4.52 Figure 3.4 'Summary of site recommendations' recommends that ES3 is retained as an allocation due to its gateway location. This is however subject to first establishing the landowner's intentions and also addressing concerns about the access. Despite this recommendation, we note that the same assessment also acknowledges that "*there may be limited demand due to proximity to Olympia Park and Access 63 on A63 corridor*".
- 4.53 As explained at paragraph 3.42 of the ELR, there has been no evidence of the site being marketed and the landowner's intentions are currently unknown. Our Client therefore has significant concerns with this recommendation.
- 4.54 It is important to ensure that the sites allocated are deliverable. The fact that the site has previously been allocated within the adopted development plan, has been subject to a planning permission, and has not been delivered clearly demonstrates that there are significant issues with its deliverability. This could either be through the intentions of the landowner not willing to bring the site forward or due to physical constraints that cannot be addressed. As such, our Client would request that the Council fully considers this recommendation and looks for suitable alternatives where the landowner's intentions are clear.

Papyrus Works, Newton Kyme, windfall site to be potentially retained – ES14

- 4.55 Paragraphs 3.84 to 3.87 of the ELR set out the assessment of ES14. It identifies that planning permission was granted on the site for residential development and 9 employment units under the reference (2012/1053/FUL). The assessment highlights that this represents a windfall site.
- 4.56 The residential development is now under construction and is being actively marketed by the developers, Redrow Homes. In the case of the employment units, having reviewed the application documents online, there is little information relating to the 9 employment units themselves other than an annotation on the Site Layout Plan. The ELR is written on the understanding that it is the intention for these employment units to provide B1 workspace, totalling 20,000sqft (1,850sqm).
- 4.57 Paragraph 3.86 suggests that the site is being marketed for employment uses and the landowners intentions have been confirmed via their agent. However, there is no such evidence online to suggest that any marketing has taken place. While the landowners intentions may be clear, as it currently stands there is no evidence of any marketing nor that there has been any developer interest. The construction works that are currently ongoing are in connection with the residential development and not related to the employment. Furthermore the site plan on Redrow's website indicates that the commercial development is only 'potential future commercial development' therefore raising doubt as to whether it will be marketed or delivered as such. The score of 5 given to the site within the scoring matrix therefore appears to be incorrect and needs to be amended. In this instance, a score of 1 is more appropriate. This therefore reduces the overall score from 48 to 44.
- 4.58 Further to the above it is considered that the site should not be allocated as an employment allocation going forward.

Potential Additional Sites

- 4.59 The ELR proposes that sites which achieve a high score would likely start of any search for new land for allocation. Accordingly, it is critically important that sites are scored correctly and based on a sound methodology and set of assessment criteria.
- 4.60 High scoring and low scoring thresholds have been determined by taking the highest and lowest scores and identifying quartiles based on the range. We refer back to our comments above on the chosen assessment criteria and the actual scoring of sites. The ELR should be updated to take account of these comments and sites re-scored.

Selby Rural FEA

- 4.61 Within the Selby Rural FEA, which is located on the northern eastern part of the district, the ELR highlights that 19 potential additional sites have been considered.
- 4.62 Direct reference is made to our Client's Sites at Riccall, Whitemoor, Wistow and Stillingfleet which are identified as having '*sub-regional investment potential*' and it is acknowledged that Whitemoor and Riccall are being actively promoted for employment development by our Client and its agents. However none of the sites are identified as high scoring sites (44 and above). This is incorrect and should be addressed in accordance with our scoring assessment above, which clearly demonstrates that Riccall and Whitemoor **are** high scoring sites.
- 4.63 With regard to the two sites that are identified as high scoring sites (The Old Brickworks and Land at Northfield Road, Hemingborough) it is noted that '*neither site has been put forward as part of the Call for Sites Exercise, again bringing into question their availability/achievability of the remainder.*' This clearly should have been established as part of the ELR process. As it stands neither site passes the 'availability' test set out in national planning policy and guidance, and as such it would be unsound to proceed to allocate them on this basis.
- 4.64 Furthermore it is noted that none of the other sites put forward in the Call for Sites are identified as having being actively marketed.
- 4.65 In light of the above considerations, it is clear that there is a strong case for the allocation of the Riccall, Whitemoor, Wistow and Stillingfleet sites.

South Selby FEA

- 4.66 Within the South Selby FEA, we note that 11 potential additional sites have been considered. This includes our Client's landholdings at Kellingley Colliery which is by far the largest site considered. We also note that our Client's site has been identified as a '*sub-regional opportunity*' reflecting its scale and location close to junction 34 of the M62. It is our Client's view that this together with existing rail and canal infrastructure present at the site, means that the site actually represents a regional opportunity, and should be recognised as such.
- 4.67 Reference is made to Kellingley Colliery as still being largely in active use. Whilst it is acknowledged that the ELR represents a snap shot in time, our Client has made clear that the Colliery is due to close within the next 6 months as such its use as an active mine site is due to cease in the short term. This should be recognised within the ELR.

- 4.68 It is stated that none of the additional sites are high scoring. This is not the case. The Kellingley Colliery site comprises a high scoring site (as per our assessment above) and therefore the ELR should be revised to reflect this.
- 4.69 Furthermore whilst the Kellingley Colliery site is not currently being actively marketed, it will be in the short term and our Client has had discussions with potential interested parties.
- 4.70 Taking the above factors into consideration it is clear that there is a strong case for the allocation of the Kellingley Colliery site for employment purposes.

Sherburn FEA

- 4.71 Finally, within the Sherburn FRA, we note that 8 additional sites were considered. This included our Client's site - Gascoigne Wood Mine Site (PS42), the largest site to be considered.
- 4.72 The Gascoigne Wood Mine Site is identified as having potential to become a specialist freight terminal site, in addition to accommodating general industrial/businesses uses. This is welcomed by our Client following previous representations demonstrating the site's potential for such uses. Paragraph 3.126 highlights that the Gascoigne Wood Mine Site is the only additional site being marketed for employment development.
- 4.73 None of the sites considered have been identified as scoring highly. Again this is incorrect for the Gascoigne Wood Site and should be rectified.
- 4.74 Again, there is a clear case for the allocation of the Gascoigne Wood Mine Site based on it being a highly scoring site that is being actively marketed in addition to the numerous other reasons why the site should be allocated. These are detailed in our previous representations and promotional document and include the unique attributes of the site not least the extensive and high quality rail facilities capable of handling large volumes of traffic and accessible from both the Leeds and Selby directions thereby allowing rail links to be directly made to industrial and distribution centres throughout Britain.
- 4.75 Accordingly, there needs to be much more than a fleeting reference to the potential of Gascoigne Wood within the ELR.

Summary of Potential Additional Supply

- 4.76 The ELR considers that the main options for future employment land in the potential additional supply, includes sites along the A19/A63 corridors in South Selby and the former mine sites. This view is strongly supported by our Client on the basis that it reflects the

findings of the evidence. It is clear that our Client's sites are very strong contenders for new employment allocations in PLAN Selby.

Projecting the Demand for Employment Land

4.77 Section 4.0 of the ELR deals specifically with the future demand requirements for employment land and in doing so assesses three different approaches/models all of which are focused at a local authority i.e. Selby district level;

- Historic take-up based estimates
- Historic change in floorspace; and
- Labour demand modelling.

Historic Take up Rates

4.78 The ELR uses data provided by Selby DC's Planning Team relating to take-up on allocated employment sites to analysis average take-up over a ten year period. A copy of the data provided by the Planning Team is not provided therefore we have been unable to ascertain whether this data is robust or correct and whether it has been analysed correctly.

4.79 We note however that the ELR states that the data only relates to take-up on allocated sites and therefore does not account for windfall sites that have been developed over the same period. Given the amount of large windfall sites that have come forward in Selby we consider this is a flaw in the assessment which leads to a skewing of the take up figures suggesting that take up has been less than is actually the case.

4.80 It is interesting to note for example that no take up of allocated sites in Tadcaster and Selby Rural has recorded by Selby DC. We know that the Riccall and Whitemoor sites in Selby Rural have come forward as windfall sites and this proves to demonstrate that the true take up figures are being masked which in turn depresses the projected annual take-up rates by area going forward. It also suggests that there has been a problem with the nature of the allocated sites, rather than a lack of demand per se.

4.81 The ELR should recognise that the assumption that similar take up rates are likely to continue on the future has limitations and historic take up rates need to be considered against a range of factors including changing policy contexts, economic viability and market conditions and quality of sites. There is a need to consider supply as a way of stimulating demand and simply extrapolating previous low (or in this case purportedly zero) take up of land and concluding that there is no existing or future demand would result in continued

decline in that area and would not achieve the aims and ambitions of the LEP or the Core Strategy, particularly in relation to the economic regeneration of rural areas within the district.

- 4.82 Further to the above the past take up rate model is considered to be flawed and does not provide an accurate or robust basis on which to forecast future demand for employment land within the Selby district.

Commercial Floorspace Change Model and Labour Demand Modelling

- 4.83 We note that two models have been applied and these have provided a range of land requirements of between 28.46 ha (baseline REM) to 59.99 ha (commercial floorspace change) to 2027 which gives a range of between 2.19 ha and 4.61 ha per annum over the plan period (paragraph 4.56).
- 4.84 Our Client supports the higher 59.99 ha figure but stresses that this should be treated as a minimum and Selby should aspire to deliver more good quality employment land in order to offer the local and inward investment markets sufficient choice and flexibility. In addition it should be recognised that there are sites within the district which look beyond the local market and are uniquely positioned to provide supply for regional and national demand for specialist sectors. Overall delivery should be planned across a variety of sites and locations in order to provide choice and flexibility for expansion of local business, regeneration benefits and a diverse range of local employment opportunities. In addition it is strongly advised that the Council not only identifies sites that are suitable for a range of B uses but also identifies sites with specific locational qualities. Recognising that this figure is very much a minimum would not only provide flexibility in the choice and variety of sites, including sizes of sites, available to help stimulate economic growth and provide a range of quality of sites, but would also assist in accounting for sites which may be wholly or partially redeveloped for other purposes or uses such as housing.
- 4.85 Given the uncertainties surrounding long term forecasting and the many factors that could affect Selby's economy over the period to 2027, as well as the unique qualities of certain sites locate within Selby, we therefore strongly recommend that the Council adopts a flexible approach to planning for employment land, providing a range of sites that meet the needs of businesses of differing type and size.

Balancing Supply and Demand*Criteria for Identifying Key Employment Locations in Selby*

- 4.86 Our Client supports the identification of locations in proximity to the M62/A19/A63/A64 corridors and large scale sites which can offer occupier flexibility and large scale investment potential as strategic sites/key employment locations for investment in Selby to match strategy and meet anticipated needs over the plan period.
- 4.87 The demand-supply analysis clearly demonstrates that the Selby district has an undersupply of employment land to 2027. Therefore the Council should bring forward new allocated sites to address this shortfall and allow for sufficient flexibility and choice in order to facilitate the expansion of existing businesses a offer high quality sites to capture inward investment in business sectors that will assist in diversifying the district's economy, bring rural regeneration benefits and maintain balanced economic prosperity in the period to 2027.
- 4.88 The demand and supply analysis does not look beyond the local Selby market and the particular characteristics of the Gascoigne Wood and Kellingley sites, which is considered by a key failing of the ELR. These sites look far beyond the local Selby market and this needs to be recognised. They both have the ability to attract major inward investment and deliver supply to meet the projected demand arising from the predicted rail freight growth in the UK. There are a number of drivers which will result in demand for new and improved rail freight interchange sites. Selby is uniquely positioned to be able to offer sites with power, water, rail and road connectivity and this opportunity should be seized upon and embraced within the Selby PLAN document.

Recommendations by FEA*Selby Rural FEA*

- 4.89 We support the view that given the lack of suitable existing supply there is a need to consider future allocations to meet demand and/or take a supportive policy stance towards rural economic development.
- 4.90 We strongly support the proposed option of considering the former mine sites or adopting a positives policy stance towards their redevelopment, which would also bring regeneration benefits.

South Selby FEA

- 4.91 We support the view that there is a clear requirement for more land to be allocated to meet future needs in the South Selby FEA. Kellingley Colliery should be identified as the main option and its regional and national attributes should also be recognised.

Eggborough, A19 Jacksons – PS3

- 4.92 The ELR identifies PS3 as the highest scoring site within the Selby South FEA. Paragraph 5.24 highlights that the site has been promoted through the Call for Sites and should therefore be considered for allocation. Having reviewed the justification provided within the scoring matrix and within the ELR assessment itself our Client has significant concerns.
- 4.93 PS3 is identified as an open field of Grade 2 agricultural land classification (i.e. very good) on the edge of Eggborough. The Greenfield site is located on the northern extents of Eggborough and adjacent to Eggborough Power Station. Satellite images highlight that the site is currently used for agricultural purposes and this is confirmed within the scoring matrix.
- 4.94 As noted above, the site has historically been identified within previous draft versions of the Site Allocations document, including the Preferred Options. In this instance, the document clearly stated that it was considered that the loss of this Grade 2 site could have a negative effect on the agricultural economy of the rural area and would not encourage the efficient use of land through the development of Brownfield sites before Greenfield sites.
- 4.95 Paragraph 112 of the NPPF states that Local Planning Authorities should take into account the economic and other benefits of the best and most versatile agricultural land and seek to use poorer quality land in preference to that of higher quality. As such alternative high scoring sites which comprise lower grade land should be considered in preference to higher grade sites such as this one.
- 4.96 In addition to the above, the ELR also highlights that an assumption has been made regarding ownership. This is not robust and the landowner's intentions should be confirmed as it clearly affects whether this site would be a deliverable allocation.

Sherburn FEA

- 4.97 We do not support the view that the existing supply is more than adequate to meet future needs in the Sherburn FEA.

4.98 We do however support the view and recognition that the Gascoigne Wood site has the potential to meet a specialist rail freight terminal need and that a supportive policy for such uses be included within PLAN Selby to facilitate regeneration, but also to capitalise on the site's unique attributes and specialist qualities recognising its regional and national status.

Policy Recommendations

4.99 Paragraph 5.41 of the ELR states that the findings of the demand modelling work support the existing policy position within the Selby Core Strategy of an additional 37-52 hectares of land for employment development to be brought forward across the District in the period up to 2027. However the findings actually suggest an upper range of 59.99 hectares and this should be recognised and identified as a minimum, for the reasons given above.

4.100 As stated above, we support the conclusion that there is insufficient existing employment land supply within Selby Rural FEA and South Selby FEA and as such further sites need to be identified through PLAN Selby. In addition, the specialist qualities of the Gascoigne Wood site located within the Sherburn FEA should also be recognised and the site allocated to meet regional and national demand for rail freight sites. Overall, an aspirational approach should be adopted with PLAN Selby which takes forward all of the mine sites for employment allocations.

Our Conclusions

4.101 Whilst the ELR has sought to provide an estimate for future employment land needs in Selby, these should be considered as guidelines and used as one of many factors to inform the preparation of robust employment policies and allocations in the forthcoming PLAN Selby document. The quantitative estimates should not be applied in a rigid or prescriptive manner as the market and wider economic forces will dictate actual demand as it materialises over the plan period. However, the estimates provide a starting point of minimum requirements for planning for an efficient and productive economy.

4.102 Given the uncertainties surrounding long term forecasting however, and the many external factors that could affect Selby's economy over the period to 2027, it is strongly advised that the Council adopts a flexible approach to employment land planning, providing a range of sites that meet the needs of businesses of different type and size. We recommend that, in addition to the overall minimum quantum of land for allocation providing the focus of planning policy, sites should be identified with specific locational qualities which can provide supply to meet other specialist demand.

- 4.103 We firmly recommend that the Council allocates additional employment land in order to fully meet demands over the plan period. Without sufficient employment land, projected job growth will be very difficult to achieve as existing businesses within the District will find it difficult to meet their aspiration to expand and inward investment into the District would be hindered due to a lack of suitable sites. This could ultimately mean that existing businesses and those looking to locate or invest in the District are forced to look elsewhere for suitable sites.
- 4.104 In addition, housing growth needs to be supported by new jobs and failure to provide sufficient land to meet the projected growth targets would impact on the number of jobs available to the existing and future residents of the District, resulting in more residents needing to look outside the District for employment. This would result in a failure to meet the key Core Strategy ambition of increasing Selby's self-sufficiency and reducing levels of our-commuting.

Appendix 1

Notes form discussions with Colliers and Harworth Estates

TELEPHONE NOTE

Date: 5th August 2015

Job No: 20970/A7/LT

The following notes summarise a telephone conversation between Barton Willmore and Jonathon Mcgreal at Colliers. Colliers are currently acting as agents for Harworth Estates and are extremely active in the local property market.

- Harworth's Sites at Whitemoor and Riccall are actively being marketed by Colliers for employment development. In the case of Riccall, occupancy is good.
- Colliers agreed with the comments provided by the other agents consulted as part of the Employment Land Review (ELR) which suggested that the local property market is stable and resilient in the long-term context. In the short term, Colliers also agreed that the markets have been slightly erratic with demand for property up and down.
- Colliers advised that they have recently experienced significant demand for new commercial space within York. However, given the extent of Green Belt surrounding York, there is currently little space to accommodate additional growth. As such, there is excellent potential for this demand to be redirected to the district of Selby.
- A general discussion was then had surrounding the nature of the property agents that were consulted during the preparation of the ELR. Macbeth and Burley are local rural agents who are York based and predominantly deal with small business parks. GVA and Knight Frank larger in size but are not significantly active in the Selby market. DTZ and Colliers are however.
- Colliers made reference to a report prepared and published by the Leeds LEP which highlights a requirement to provide rail freight interchange within the region. Having considered sites from across the region, the report concludes by confirming that Gascoigne Wood was the only site that was considered suitable given its proximity and existing rail infrastructure.
- Colliers highlighted that the Gascoigne Wood site would prove extremely popular to the market given the existing rail connections including connections directly to the Felixstowe Port.
- Despite being active in the local property market, Colliers are currently unaware Olympia Park Site and questioned why nothing had happened on it. On this basis, it was considered that too much emphasis was being placed on the site by Selby District Council and GVA within the ELR Assessment.
- Colliers highlighted that nature of B2 uses means it is preferential for such sites to be located away from existing or proposed residential development. As such, the mine sites respond positively to this stance given their location.
- A general discussion was then had around the criteria applied within the scoring matrix within the ELR. Whilst most of the criteria were considered appropriate, Colliers agree with Barton Willmore's concerns regarding the final criteria – the proximity to a strategic allocation. They failed to see how sites located in closer proximity to a strategic allocation should be considered more favourably.

- In terms of local market activity, there is currently significant demand for hub/parcel distribution type developments.
- Reference was then made to the latest report published by Network Rail which details the capacity of the rail network across the country. The report reaffirms that Gascoigne Wood has significant rail infrastructure which can accommodate extra long trains. This is unique and should be regarded as a significant asset for the District.

Comments made by Harworth Estates

- Harworth Estates has an extremely strong track record in securing external financing to bring forward development for commercial uses. This has included securing a £11m loan from Greater Manchester Infrastructure Fund to pay for infrastructure works to open up Logistics North in Bolton, a site that could deliver up to 7,000 jobs and add over £300m in Gross Value Added to the local economy.
- Gascoigne Wood and Kellingley are both huge sites with decent access, and Gascoigne has already attracted national employers like DB Schenker & Siniat as tenants owing to its rail access. With Kellingley also having rail connection potential in a market that is screaming out for rail connected space to boost efficiency.
- Confirmed that a number of active enquires had been received in respect of Kellingley and concurred that enquires had been received from investors looking at the York market.
- Sectors – SME's across various, renewable / recycling, aggregate B8, warehousing B8, energy (biomass), rail supply chain manufacturing, rail linked manufacturing and heavy industrial.
- Kellingley and Gascoigne Wood – they receive enquires on a periodic basis attracted by the rail infrastructure, the square footage available and the overall accessibility.
- The majority of the mine sites are located away from populated areas and can therefore accommodate a range of B2 uses.
- There is no recognition with the ELR report that both Kellingley and Gascoigne Wood look far beyond the local Selby market. The existing power, water, rail and road infrastructure should be viewed as a unique offer for Selby.

Selby District Local Plan
Site and Policies: Interim Consultation
Green Belt Study

Written Statement by Barton Willmore on behalf of
Harworth Estates

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

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

5.1 The adopted Core Strategy acknowledges (paragraph 4.47) that a full review of the Green Belt is necessary in order to ensure that;

“only land that meets the purposes and objectives of Green Belt is designated as Green Belt...The review may also address anomalies such as (but not exclusively) cartographic errors and updates in response to planning applications, reconsider “washed over” villages against Green Belt objectives, and consider simplifying the on-the-ground identification of all the Green Belt boundaries by identifying physical features that are readily accessible and likely to be permanent.”

Starting Point of the Assessment

5.2 We welcome the clear stance within the draft stage 1 document which makes it clear that *“the 'starting point' for the assessment is the existing boundary for the Green Belt as defined within the Selby District Council Local Plan 2005”*.

Comments in relation to Green Belt Assessment

5.3 Section 6.1 of the Green Belt Study highlights that the Green Belt within the whole of the Selby District has been sub-divided into *'44 General Areas'*. These were then assessed against the five purposes for including within Green Belt (set out at paragraph 80 of the

Framework) and an overall score was applied. Ten factors are considered which means a maximum score of 50 is possible, 10 being the minimum. Those sub areas that scored the lowest, are considered to offer the least to the five purposes and therefore are considered to be regarded as more preferential for Green Belt Release.

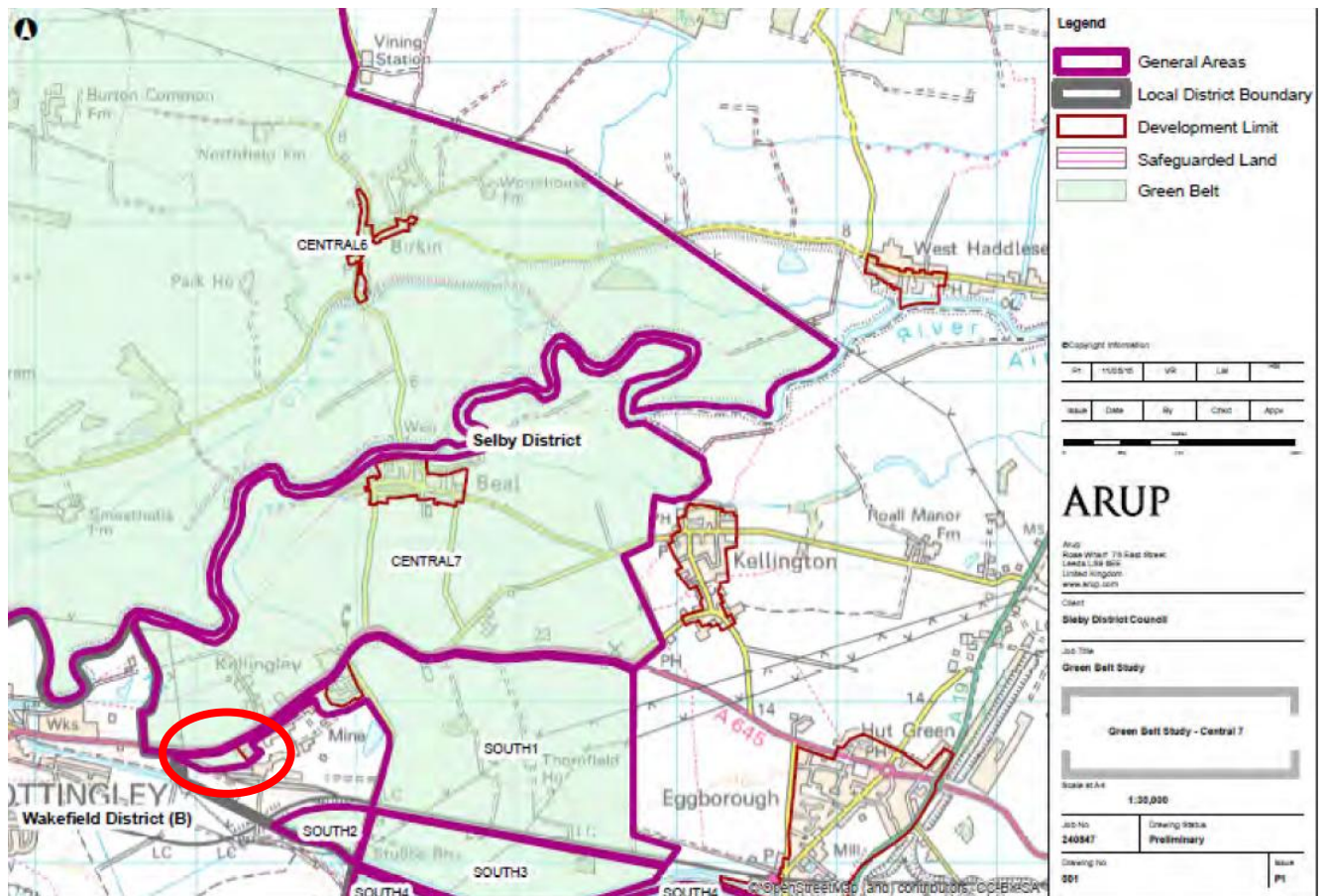
5.4 The Central Areas most relevant to our Client are the areas labelled 'South 1' and 'South 2' which include land owned by Harworth Estates at the Kellingley Colliery Site. Comments are provided on each below:

- **South 1** - comprises an area of land 196 hectares in size and is situated directly to the east of the Kellingley Colliery Site. The assessment table contained on page 53 of the report highlights that the site scores relatively low when assessed against the five Green Belt Purposes. The exception being, the second criterion contained under "Purpose 1: To check the unrestricted sprawl of Large Built Up Areas". The assessment states the *"designation of Selby Green Belt at this location therefore forms an additional boundary to restrict urban sprawl from Wakefield"*.

Our Client's site in this location forms a small part of the existing Green Belt and is located between existing residential development and the Kellingley Colliery Site. It is considered that the small section of our Clients site located within South 1 offers little to the first purpose and should therefore be excluded from the Green Belt boundary.

- **South 2** - this comprises an area of 11.6 hectares and is located directly to the south of the Kellingley Colliery site. We note from the scoring matrix that South 2 scores relatively low when assessed against the five purposes. This is supported by our Client and reaffirms their early representations which highlighted that the site does not meet the tests for including land within the Green Belt and that the site is suitable in the short term for employment uses.

5.5 We note that there is an area of Harworth Estates landownership at the Kellingley Colliery site (land located in the northwest corner of the site) which does not fall within one of the identified general areas:



5.6 This is an error within the assessment which needs to be addressed. If it is a cartographic error and then land is meant to be within the 'Central Area 7' then our comments are as follows:

- **Central 7** – Like South 2 above, Central 7 also scores relatively low when compared with other 'Central Areas' across the District and assessed against the five purposes. The exception being the last purpose – "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land" for which it scores 4 out 5.

We note from section 5.5 of the report that from dialogue with Wakefield MBC, they have highlighted that the settlement of Knottingley is regarded as a 'Regeneration Priority Area'. Furthermore, in respect of our Clients Site, which is currently occupied by an operational colliery scheduled for closure in 2015, the Council have also identified it "as a regeneration priority". Our client fully supports this position. Both these factors clearly have a bearing on the overall scoring that is applied to the last of the five purposes – assisting in Urban Regeneration. However, as explained in

previous representations, the majority of the consented land at the Kellingley Colliery Site is already excluded from the Green Belt in the adopted Local Plan. The exception being, the northern end of the site which is still shown as being located within the Green Belt.

Given that this part of the Site forms part of the original consent for the colliery it is assumed that this was a cartographic error made by the Council when preparing the Green Belt boundaries on the proposals map at the time of the preparation of the old Local Plan. The Green Belt boundary should follow the northern boundary of the consented colliery site i.e. along Weeland Road (A645). This will serve to provide a more defensible and long lasting boundary, as required by national planning policy.

Through the release of this small section of land it will ensure the regeneration priorities of the Council are archived through the redevelopment of the site but at the same time will not undermine the wider priorities of Wakefield MBC to facilitate the regeneration of Knottingley.

Selby District Local Plan
Site and Policies: Interim Consultation
Development Limits

Written Statement by Barton Willmore on behalf of
Harworth Estates

Q6 (DL) Do you have any comments on:

- a. the need to identify development limits in PLAN Selby?**
- b. an alternative policy approach to protect the countryside?**
- c. the proposed methodology for defining development limits?**
- d. the conclusions about defining 'tight' development limits?**

- 6.1 There is recognition within the adopted Core Strategy that a full review of the existing development limits will need to be undertaken across all settlements in emerging policy documents. This review will need to ensure the existing boundaries are still appropriate and subsequently whether revisions need to be made to allow for the planned growth. The PLAN Selby document will provide the mechanism for this to be undertaken.
- 6.2 Arup have been appointed by the Council to provide a method statement setting out how this review will take place, having regard to policy documents and other practice examples.

Criteria for Defining Development Limits

- 6.3 Turning specifically to section 3.4 which sets out the recommended criteria for defining whether an area of land should be included or excluded from within the development limit boundary, our Client would like to make the following comments.

Proposed Site Allocations

- 6.4 In respect of point 1, Proposed Site Allocations, our Client supports the recommendation that sites proposed to be allocated for employment, that currently fall outside the established development limit boundary, are included within the defined development limit. This will ensure these sites are delivered in line with the policy requirements set out in the adopted Core Strategy policy SP2 'Spatial Development Strategy'.

Existing Development Limits

- 6.5 In respect of point 2, check of 'Existing Development Limits', again our Client fully supports Arup's recommendation that a full review of existing limits should be carried out. More site specific comments in relation to our Client's site at Kellingley is provided in the separate note on the method statement relating to the status of villages within the Green Belt, but in short, we believe the existing development limit that surrounds the Kellingley Colliery Site in particular has been drawn incorrectly. A full review will allow for these drafting errors to be corrected to ensure the PLAN Selby document is prepared on a sound basis.
- 6.6 We reserve the right to make further comments in respect of future development limits at the next stage of the local plan consultation.

Selby District Local Plan
Site and Policies: Interim Consultation
Safeguarded Land

Written Statement by Barton Willmore on behalf of
Harworth Estates

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

7.1 Paragraph 85 of the Framework relates specifically to defining Green Belt boundaries. It makes it clear that when defining boundaries, Local Planning Authorities should, *inter alia*;

“Where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period”.

7.2 Arup have also been instructed by the Council to undertake a study of Safeguard Land requirements within the District. Their findings are to form the evidence base for the PLAN Selby document.

7.3 The study highlights that national planning policy contained within the Framework suggests that local authorities should only consider designating safeguarded land *‘where necessary’*. The report goes onto provide a snapshot of the current delivery rates in relation to housing development over the last five years both on previously developed land and also through ‘windfall’ developments. There is no reference to the delivery of employment development.

7.4 We do however note that there is no acknowledgement of employment land and the likely requirements throughout the plan period and beyond. Clearly this needs to be included in any subsequent assessments to ensure the Council can meet the longer-term development needs across all sectors, in line with paragraph 85 of the NPPF.

7.5 The study then goes onto explain that the *‘where necessary’* requirement can only be made following the completion of detailed site assessment and selection work that is being undertaken by the Council. Our Client agrees with this position and reserves the opportunity to provide further comments once this selection work has been undertaken.

7.6 A number of options for the Council to consider are provided. These options are set out as follows:

- Option 1: No New Safeguarded Land Identified;
- Option 2: Identify an evidenced level of Safeguarded Land based on 'Longer Term Development Needs; and
- Option 3: Identify two Plan Periods of Safeguarded Land.

7.7 Our client has major concerns with option 1. They therefore support the use of either option 2 or 3. The reasons for this stance are set out below:

- The Framework offers support to the identification of safeguarded land between the urban areas and the Green Belt to meet needs well beyond the plan period.
- The identification of new safeguarded land will provide a source of supply to ensure that Selby DC can meet its identified employment needs towards the end of the plan period or during the preparation of a new development plan.
- The Council needs to ensure there are provisions to meet the objectively assessed need for new housing and employment growth across the District.
- To be deliverable, the Council needs to ensure there is flexibility to bring forward additional supply, particularly towards the end of the plan period, where deliverability of identified sites cannot be assessed with the same level of certainty as sites identified to come forward earlier in the plan period.
- The inclusion of safeguarded land will ensure the plan is effective over the plan period by providing additional supply in the event allocated sites do not coming forward as expected or at the very least provide the first source of supply for the next plan period without the requirement for another Green Belt review.

Selby District Local Plan
Site and Policies: Interim Consultation
Villages in the Green Belt

Written Statement by Barton Willmore on behalf of
Harworth Estates

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

- 8.1 The Council acknowledges that a full Green Belt review is required to ensure all development requirements are met throughout the plan period and also to ensure the boundaries will not need to be altered at the end of the development plan period.
- 8.2 As part of this assessment process, the Council have instructed Arup to prepare a method statement to be used when assessing the status of villages within or outside the Green Belt. The draft methodology published for consultation sets out a review of relevant national guidance, a critique of neighbouring authorities and a suggested approach for assessment in subsequent drafts of the PLAN Selby document.
- 8.3 Our Client's primary interest in respect of this method statement is Kellingley Colliery which, is designated in the Selby Core Strategy as a Secondary Village with defined development limits, albeit these limits have yet to be defined.
- 8.4 The assertion at Table 2: "*Current Status of Villages affected by Green Belt in Selby District*" that the Kellingley Colliery is a "*village within the Green Belt (Washed over)*" is **incorrect** and this has been stressed in previous representations submitted by Barton Willmore on behalf of our Client. The Council have consistently failed to take note of these representations. These comments are again provided below for reference. The necessary alterations **must** be undertaken in the next draft of the PLAN Selby document, otherwise it will be open to legal challenge. Accordingly, Table 2 within the ELR needs to be corrected.
- 8.5 The exclusion of the Kellingley Colliery site (40A) from the Green Belt was considered at length at the Selby District Council Local Plan Inquiry. A copy of the relevant extract of the Inspector's Report published in June 2002 was appended to our previous representations and a further copy is enclosed at **Appendix 1** for reference. This makes clear that the extension of the adopted Green Belt boundary to include the Colliery does not accord with PPG2 and that there were no exceptional circumstances to justify the inclusion of the site within the

Green Belt. Also of note is the Inspector's view that it was overly optimistic of Selby District Council to expect the site to revert to one which is permanently open due to the lack of restoration conditions.

8.6 Following the Inspector's recommendation, the Kellingley Colliery site was **excluded** from the Green Belt in the adopted Selby District Local Plan and therefore lies **outside** of the Green Belt.

8.7 Notwithstanding the above, the draft method statement goes onto suggest that existing villages should be considered for inclusion into the Green Belt. It stresses that this assessment will be carried out at the next stage of the plan preparation process but sets out a suggested methodology for assessing whether villages should be washed over by Green Belt.

8.8 Our Client welcomes the opportunity to provide further comments in due course but would like to highlight again the main reasons why the Kellingley Colliery village **should not** be included within the Green Belt. These include:

- 1) The Kellingley Colliery site has been excluded from the Green Belt since the boundaries were first adopted in 1974. Paragraph 83 of the Framework states that "*Once established, Green Belt boundaries should only be altered in exceptional circumstances.* The Council has not provided any exceptional circumstances justifying the future inclusion of the site in the Green Belt.
- 2) Extending the adopted Green Belt boundary to include the Kellingley Colliery site does not accord with the five purposes of including land in the Green Belt as set out in Framework for reasons previously set out in the Planning Inspector's report into the previous Selby Local Plan (enclosed). This remains the case and is demonstrated by Arup's own Green Belt assessment (Green Belt Study Stage 1);
- 3) The Selby District Council Core Strategy states that it aims to maintain the overall extent of the Green Belt, and that consideration will only be given to undertaking localised Green Belt boundary reviews where there are difficulties in accommodating the growth required. This relates to the future *exclusion* of land from the Green Belt. The Core Strategy does not even refer to, let alone justify, the future *inclusion* of land previously excluded from the Green Belt.

8.8 In the absence of any stated exceptional circumstances justifying the case for including the Kellingley Colliery within the Green Belt, and the fact that the site would not meet the criteria set out in the Framework for inclusion of land in the Green Belt, the site should not be

designated as such within the emerging PLAN Selby document. Any such designation would be unsound and not legally compliant on the basis that it would be unjustified, ineffective and contrary to national planning policy.

- 8.9 We note that only two comparative approaches to determine the status of villages in Green Belt have been identified within the method statement these being; Guildford Borough and Woking Borough. In order to be more robust it is considered that a wider selection of comparative approaches should be looked at including Boroughs/Districts that are located within closer proximity to Selby and which share comparable attributes.

Appendix 1

Inspector's Report into the Selby District Local Plan published in June 2002

KELLINGLEY COLLIERY

Policy: GB1

Objection: 726/4

Issue

Should Kellingley Colliery [Site 40A] and adjacent land to the south [40B] be included within the Green Belt?

Inspector's appraisal and conclusions

16.215 The operational area of Kellingley Colliery lies to the east of Knottingley and to the south of residential development and unused land/woodland on the A645, Weeland Road. It is bounded by Sudforth Lane to the east and the Aire and Calder Navigation and the Goole-Leeds railway line to the south.

16.216 It is proposed in DDSLDP that the Green Belt should be extended to wash over the operational colliery land [40A], and also include a triangular area of agricultural land [40B] to its south, beyond the Goole-Leeds railway line and bordered by the Aire and Calder Navigation on the south side. The Colliery itself is intended to be identified as a Major Developed Site [MDS] under Policy GB3.

16.217 Both parts of the objection site were excluded from the Green Belt when its boundaries were established in the Castleford, Featherstone, Knottingley, Normanton and Pontefract Town Map of 1974.

16.218 The sites lie to the north and east of the Selby District and Wakefield Metropolitan Borough boundary. Knottingley lies within Wakefield MB and is excluded from Green Belt in the Wakefield UDP. There has been an extension of the Green Belt within Wakefield MB from that originally designated in the above Town Map of 1974 to incorporate land to the south-east of Knottingley, extending to the edge of the built-up area, the Goole-Leeds railway line, Southmoor Cross Road and the Aire and Calder Navigation.

16.219 RJB object to the proposed extension of the Green Belt and also consider that Site 40B should be recognised in the Plan as suitable for an 'Integrated Gasification Combined Cycle' [IGCC] power station.

Site 40A

The purpose and objectives of including land within Green Belt

16.220 On the face of it, extending an adopted Green Belt boundary to include land which is occupied by a colliery does not appear to accord with the five purposes of including land in Green Belts set out in para. 1.5 of PPG2. The prevention of neighbouring towns merging into one another and preserving the setting and special character of an historic town are not relevant considerations. Setting aside Site B which I deal with below, the extension would not safeguard the countryside from encroachment because the colliery is a substantial existing development.

The most important attribute of Green Belts is their openness, but the operational colliery land does not have this characteristic, despite containing pockets of undeveloped and agricultural land. It appears as a very dominant developed area when seen from the south and is not sufficiently well concealed by woodland, hedgerow and residential properties when seen from Weeland Road to be perceived as part of the countryside. Although the adjoining site to the west has been allocated for employment purposes in the Wakefield UDP, the council argue that the Colliery is joined only by a narrow neck of land and is virtually enclosed by open countryside. This is not the same as being enclosed within the Green Belt, as an isolated colliery in the countryside would be. In this case the Colliery does appear more as an eastward continuation of the built-up area of the settlement than as part of the Green Belt countryside. Consequently the inclusion of the site could not properly be regarded as serving the purpose of checking the unrestricted sprawl of a large built-up area. The remaining purpose, to assist in urban regeneration, by encouraging the recycling of derelict and other urban land, is not directly relevant whilst the colliery is operating.

16.221 It is a fact that, by their nature mining activities are a temporary use of land. Kellingley has significant reserves of coal and is likely to continue in operation beyond the Plan period, but to a degree the council are anticipating the time when it does close. They state in evidence [para. 6.4 of SDC/001] that by ensuring that the site is kept permanently open on cessation of mining activities, Green Belt policies would then assist in safeguarding the countryside from encroachment and help check the unrestricted sprawl of the built-up area of Knottingley. I find this somewhat inconsistent with the present situation as I describe it above, and also with the identification of the site as an MDS. The council are possibly being optimistic in expecting the site to revert to one which is permanently open bearing in mind the lack of restoration conditions. In other contexts and in no more sustainable locations, such as the Whitemoor Mine, the re-use of redundant collieries has been pursued.

16.222 The purposes of including land in Green Belts are of paramount importance, and should take precedence over the land use objectives set out in para. 1.6 of PPG2. However, inclusion of the Colliery could not be said to fulfil those stated objectives.

16.223 I am mindful that there must also be demonstrated exceptional circumstances which necessitate a change to Green Belt boundaries to include additional land. The council must justify its inclusion in the Green Belt because the site has been excluded from Green Belt since the boundaries were first defined in the Town Map of 1974.

16.224 The review of Green Belt boundaries which the council have undertaken was prompted by 'the need to achieve a balance between meeting development needs and safeguarding the integrity of the Green Belt as a whole.' It was justified by six circumstances, set out in CD065 para. 5.3. Whilst in combination, these amount to exceptional circumstances relating to the need to establish an adequate supply of housing land and safeguarded land, I do not consider that the council's analysis includes sufficient or specific reasons for extending the Green Belt to include Kellingley Colliery. The development needs considered were principally related to housing and there is no reasoning relating to employment land needs or specific justification for adding this site to the Green Belt. Nor do I consider that safeguarding the integrity of the Green Belt as a whole is a sufficient or specific reason in relation to this site because of the relationship with the Green Belt and adjacent built-up area which I describe above. I do not consider that the fact that PPG2 refers to mineral extraction as not necessarily being inappropriate development within Green Belt is a reason for extending Green Belt to include a colliery which has been outside the

Green Belt for almost 30 years. Nor do I consider that the inclusion of the colliery can be justified as a correction of an anomaly in Green Belt boundaries and in the way in which Green Belt advice has been interpreted.

16.225 I conclude therefore that there is insufficient reason to extend the Green Belt to include Site 40A

Site 40B

16.226 Site 40B is open, agricultural land which is similar to the surrounding countryside although, visually it is dominated by the colliery. It is similar in character to land which has been included in, and more recently added to, the Green Belt in the Wakefield UDP.

16.227 The council stress that in their judgement neither objection 726/4 nor 726/22 contains an objection based upon any need or desirability for the site to be safeguarded or used for an IGCC power station. The objectors refer to the first sentence of para. 4 of their representations [Objection 726/4] where ‘the site of the proposed clean coal power station’ is mentioned and regard this as an implicit objection to the site’s inclusion in the Green Belt which would inhibit any future proposal to site a power station upon it. With hindsight they acknowledge that the objection should have been more explicit and that they should have sought an allocation of the site for the purpose. That they did not do and such a proposal is not before me. However, the objectors are content that the objection be limited to the site remaining as ‘white land’ rather than safeguarded land. These are synonyms according to PPG2.

16.228 The proposal is, in most respects, insufficiently advanced for me to reach a conclusion on whether or not it would be appropriate to safeguard the site for such a specific use. In any event the purpose of safeguarding is not to earmark land for a sole future use. That would be to confuse safeguarding and allocation. It is rather to safeguard land for possible and varying development needs in the longer term. In this respect I do not consider that the site would be suitable for residential use for example, because of its proximity to existing and proposed industrial development, and its separate and isolated position in the countryside. Also the council point out that access to either residential or industrial development could be problematic as it would not be possible from the M62 and traffic flows in the centre of Knottingley would be likely to increase. Whilst I accept that a power station proposal would be directly related to the colliery and indeed other resources such as water, it would be inappropriate to safeguard land which would not be in a suitable or sustainable location for a variety of development in the terms of para. B3 of Annex B of PPG2. Consequently I do not recommend that the site should be identified as safeguarded land in the Local Plan. I have explained elsewhere that there should not be ‘white land’ as well as safeguarded land and consequently I conclude that the site should be included in the Green Belt. Any proposal for a power station would need to be judged as an exceptional circumstance against Green Belt policies.

16.229 The council propose PIC 328 to add additional text concerning ‘Coal mining and Power Generation Industries’ after Policy EMP9. I deal with this at paras. 6.103-4 of my Report. RJB have withdrawn objections 726/2, /3, and /5.

RECOMMENDATIONS

16.230 a. That Site 40A remains excluded from the Green Belt and the Local Plan be modified accordingly.

b. That Site 40B be included within the Green Belt and the Local Plan be modified accordingly.

Selby District Local Plan
Site and Policies: Interim Consultation
Site Selection

Written Statement by Barton Willmore on behalf of
Harworth Estates

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

- a. The overall approach to the site selection process set out in section 6.3 of the study?**
- b. The details of the site assessment work proposed in Appendix A of the study?**

Preamble

- 9.1 As a major landowner within the District, our Client welcomes the opportunity to provide comments on the draft framework. They trust the comments made below will be noted and appropriate changes are made to ensure the final Site Selection Framework is formulated on a sound basis.
- 9.2 The site selection methodology proposed by Arup comprises four stages. Each stage is summarised on page 2 of the report. We note the various stages have been suggested following the guidance within the PPG and also a peer review of other Local Planning Authorities. This peer review has however been limited to the methodologies used by East Riding of Yorkshire Council, Barnsley Metropolitan and South Kesteven District Council. We would firstly question why such a limited peer review was undertaken and why it focussed on these three local planning authorities in particular.
- 9.3 There is no justification within the main body of the report or its appendices which provides the rationale for why these authorities were chosen over the numerous other authorities across the Country. By selecting such a limited number of local authorities, the peer review has the potential to become distorted and will not make use of best practice examples for site selection. Our Client therefore feels a much wider and more comprehensive peer review should be carried out.
- 9.4 In terms of the suggested methodology for Site Selection Process, our Client would like to make the following comments;

Stage 1 Initial Sift

- 9.5 Our Client has no immediate concerns with a majority of the suggested sifting criteria that will be applied at stage 1. Our Client does however strongly object to the lack of recognition that consideration will also need to be given to 'Special Policy Areas', in particular the former mine sites.
- 9.6 It has already been highlighted above that the Council recognises that the former mine sites have significant potential to provide employment opportunities within the District and are therefore the focus for regeneration within the plan period. As it stands, with the exception of Kellingley Colliery which is identified as secondary village, and Gascoigne Wood which is located in close proximity to Sherburn in Elmet, the remaining sites will be discounted at the first stage. Clearly this is in conflict with other draft method statements and also the Employment Land Review which clearly recognises the potential of the mine sites. This therefore clearly needs to be factored into the stage 1 methodology.

Stage 2 Quantitative Assessment

- 9.7 The proposed sifting criteria for stage 2 are based on national guidance and also those identified through the limited peer review. Our Client has no immediate comments on site selection criteria at stage 2.

Stage 3 Qualitative Assessment

- 9.8 Again our Client has no comments to make in relation to the criteria that have been suggested for stage 3. They do however have major concerns with the suggestion that the qualitative assessment will be carried out using 'Officer Judgement'.
- 9.9 Our Client considers that a qualitative assessment, of the sites that remain after stage 1 and stage 2, should be carried out a factual basis and not be reliant upon the judgement of officers within the Council. When assessing the suitability of sites based upon the potential to enhance or impact upon any identified heritage assets for example, this should be made by a suitably qualified professional and not fall to an officer to make their own judgement. A decision made by a particular officer may be distorted and could lead to a particular site not being allocated.

9.10 As such, our Client recommends that the suggested methodology proposed for stage 3 is reconsidered to ensure the selection process is transparent and robust. If not, the PLAN Selby document will not have been prepared on a robust basis and could leave the Council open to challenge.

Stage 4 Deliverability

9.11 Our Client recognises the importance on establishing whether the sites identified are deliverable in real terms. This should include whether or not the land owners are willing for their site to be allocated but also that there is demand from potential developers and end users. Our Client therefore has no immediate comments in relation to stage 4.

9.12 Finally, in respect of paragraph 6.3.2 which sets out the approach to employment allocations, our Client welcomes the suggestion that whilst there will be broad parallels with the approach taken for housing selection, there will notable differences. This includes a higher weighting towards the transport and accessibility criteria applied at stage 3 of the assessment. Clearly there are significant differences between employment and residential development and therefore they command different infrastructure and are required to be sited in different locations.

9.13 The comments are based on the current draft site selection framework. We note from section 7 that a further consultation will take place in early 2016 on the PLAN Selby Preferred Option Draft. Our client therefore reserves the right to provide further comments in due course.

Selby District Local Plan
Site and Policies: Interim Consultation
Market Towns Study

Written Statement by Barton Willmore on behalf of
Harworth Estates

Q15 (MTS): Is there any relevant evidence base missing from the baseline review and factsheets and is there anything incorrect about our summaries of the evidence? *(Please note we are in the process of updating our evidence on matters such as flood risk, landscape and green infrastructure)*

Q16 (MTS) Looking at the factsheets for Sherburn in Elmet which talk about the growth and regeneration of the town, do you have any comments on

- a. the 'deficits, needs and aspirations'?
- b. the technical issues?
- c. the options and key planning issues?
- d. what areas of open land, in and around the town, do you think are especially valuable and tell us why you think so? *(please describe as clearly as possible where this land is and its extent. If possible submit a map to us showing the area(s) you have picked out)*
- e. what parts of the town's built up area do you think are especially valuable and tell us why you think so? *(please describe as clearly as possible where these areas are and their extent. If possible submit a map or photographs showing the areas you have picked out)*

- 10.1 In order to ascertain the key issues, deficiencies and opportunities for the three largest settlements within the district, (Tadcaster, Selby and Sherburn in Elmet) background studies have been undertaken by Spawforths on behalf of the Council.
- 10.2 Copies of the initial studies were exhibited at planned workshops and comments received are to be incorporated into revised studies which will then be used by the Council to prepare a master plan for each settlement taking account of allocations and relevant policies.
- 10.3 Barton Willmore attended the workshop on 16th July 2015 in respect of Sherburn in Elmet in light of the comments provided to the Initial Consultation exercise of the PLAN Selby document. However our Client welcomes the opportunity to elaborate on the points raised at this meeting.
- 10.4 In particular, we would like to again express our concerns at the suggested option of using the land at the former Gascoigne Wood Site as a proposed Country Park (Options: Spatial Plan Reference SM19). The legend to the plan suggests that the Country Park option was put forward by Renaissance. A historic document 'Selby District Renaissance' prepared by Selby

DC, Yorkshire Forward and URBED identifies the possibility of a new eco-village and manufacturing development centre/facility at Gascoigne Wood. It does not suggest that a Country Park should be developed at the site and therefore the Options: Spatial Plan is wrong and misleading to suggest this. Accordingly, this should be removed as an option from the plan. In addition a label should be added to show the option of a 'manufacturing development centre/facility' as identified in the Renaissance document.

- 10.5 We also note that all sites previously submitted in the latest 'Call for Sites' appear to be identified as SHLAA sites. Again this is incorrect and misleading as sites such as Gascoigne Wood have been submitted as potential employment sites not housing sites. Accordingly this label should be revised.
- 10.6 In terms of 'needs and aspirations' as noted in previous representations, and also with the Council's own Core Strategy, the existing facilities at the Gascoigne Wood Site are unique and there is a real opportunity for the site to meet the needs and aspirations of the District in terms of delivering employment opportunities, jobs and growth. These needs and aspirations should be identified within the 'Fact Sheets' for Sherburn.
- 10.7 It is noted that under the 'employment - need' heading of the Fact Sheets for Sherburn fleeting reference is made to the ELR identifying Gascoigne Wood as having potential to meet specialist freight terminal need. Despite this, no aspirations are identified under the employment heading. Clearly our client has set out their aspirations for the site which has the potential to become a Strategic Rail Freight Interchange. The Government is currently preparing a freight strategy for the north which will support trade and freight movement within the north and to national/international markets. The Government recognises that the industry has the ability to drive forward the Northern Powerhouse, creating new and exciting job opportunities. This clearly needs to be recognised and capitalised upon within the Masterplan that is being produced for Sherburn.

Why the Gascoigne Wood site comprises land that is valuable

- 10.8 A large number of the above have already been attracted to the Gascoigne Wood site given its characteristics and existing associated infrastructure.
- 10.9 The site has excellent existing infrastructure including an existing rail connection, which is rare in the UK as it can handle the longest length of trains commonly used on the network and can be accessed from both ends. This rail connection allows materials to be more sustainably transported to and from the site rather than by lorry movements; the siding scale

and capacity is future proofed in terms of modern methods and practices within international rail freight.

- 10.10 The site already benefits from a significant existing connection to the electricity grid which allows energy generated on the site to be fed straight back into the grid. Likewise, the site is already serviced by required site infrastructure including telecommunications connections, water supply, on site sewerage, treatment plant and oil and grit surface water run-off interceptors.
- 10.11 In addition the site already benefits from an existing vehicular access which was constructed to facilitate associated operations of the colliery and was therefore designed to accommodate large vehicle movements in a safe and efficient manner.
- 10.12 The continued re-use and future expansion of the Gascoigne Wood site offers a significant opportunity to attract new investment to, and the creation of jobs in, the Selby District. Such investment could offer significant benefits to the local, as well as wider regional and national economy.
- 10.13 As such, the site represents a valuable asset located in close proximity to Sherburn town which should be recognised and capitalised upon and reflected in the future plans and emerging masterplans for Sherburn.