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Dear Sirs

REPRESENTATIONS TO SELBY LOCAL DEVELOPMENT FRAMEWORK SUBMISSION DRAFT CORE STRATEGY AND SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT ISSUES AND OPTIONS

FORMER NORTH SELBY MINE SITE

We have been instructed on behalf of our client, UK Coal to submit representations to the Selby Local Development Framework LDF) Submission Draft Core Strategy insofar as it affects the Company's landholdings at the former North Selby Mine site (hereafter referred to as the 'North Selby site'.)

Background

The North Selby Mine (see enclosed Site Location and Existing Site Plans) is one of five mines that form the former Selby Mine Complex. Planning permission for this complex was initially granted in 1976. Outline planning consent for the North Selby Mine itself was granted in April 1978. Further approval for reserved matters in relation to the surface buildings and landscaping was granted in March 1981. Both the outline and reserved matters consents were subject to planning conditions that required the land to be restored following cessation of mine working at the site.

Production at the North Selby Mine commenced in 1986 with full production at the Selby Mine Complex commencing in 1988. In 1999, production at the North Selby Mine ceased and in July 2001, UK Coal Mining Ltd announced the closure of the Selby Mine Complex.

The mine is situated 8km south of the City of York between the villages of Escrick and Wheldrake and 1 mile east of the A19 (T). The surface area of the mine site, including landscape features extends to some 37ha (91 acres). This includes the pithead area, which extends to some 9.8ha and comprises former colliery buildings, hardstanding, car parking and associated landscape areas. The colliery buildings were constructed in the 1980s to accommodate a service compound incorporating offices, canteen, medical centre, workshops and other ancillary offices. The combined floor space of these buildings is approximately 6,250 sq m. They are of modern construction and suitable for re-use. In addition to the buildings there are large areas of hardstanding suitable for external storage and approximately 250 car parking spaces.

Some of the buildings on site are currently occupied by Network Rail who use the facility for training of workers and maintenance of rail tracks and parts.

The North Selby site enjoys good access to the strategic highway network via a 1.5km access road providing direct access from the A19 which connects to the A1(M) via the A64 and A63.

Site Services & Infrastructure

The North Selby site is already connected to key services including electrical supplies and a water treatment plant.

The site also benefits from its own effluent treatment plant, which is owned and operated by UK Coal.

In addition, the site also benefits from a district heating system utilising three large scale industrial boilers on site. The system was originally designed to service the pits showering and welfare facility within the main building which is known as the Amenities Block. As such it has significant capacity.

Most importantly, in terms of electrical supplies, the North Selby site has a substantial connection to the electricity grid with a capacity of around 12MW. This high-capacity grid connection at the offers the potential for re-use of the electricity infrastructure present in the Selby Mine Complex Electricity Ring to generate low carbon energy on the site. This electricity could then be imported back into the grid to contribute to the increased requirements for energy generation without the need for new facilities and infrastructure to be constructed.

The high capacity grid connection at the North Selby site forms part of the Selby Mine Complex Electricity Ring. This Ring provides power to all of the former Selby Mine Complex sites, including those with consented employment uses (i.e. Riccall, Gascoigne Wood and Whitemoor). These sites are dependant on both the level and security of electricity supply provided by the Selby Mine Complex Electricity Ring.

It also provides emergency power supplies to Tadcaster, Bramham and Moor Lane, and provided emergency electricity supplies to Tadcaster during the floods in 2001.

The Selby Mine Complex sites therefore are all interconnected and the electricity connection at the North Selby site forms an integral part of this connection. Removal of the site's high-capacity grid connection could impact on the functionality of the Selby Mine Complex Electricity Ring and consequently impact on the consented employment uses at other Selby Mine Complex sites and emergency supplies to Tadcaster, Bramham and Moor Lane. If this grid connection was removed, significant investment would be required for it to be reinstated.

In light of the above, it is clear that the presence of significant services and electricity infrastructure at the North Selby site provides a unique opportunity to be adapted to work in conjunction with facilities proposed on the site and should therefore be retained.

The majority of the North Selby site falls within the City of York Council ("CYC") local authority administrative area. However, part of the southern part of the site falls within Selby District Council's local authority administrative area (see enclosed Existing Site Plan).

Planning History

Planning permission for the North Selby Mine complex was initially granted in 1976. Outline planning consent for the North Selby Mine itself was granted on 10 April 1978 (consent No. C/8/999/18/PA). Further approval of reserved matters relating to the surface buildings and landscaping were granted in March 1981 (consent No. C/8/999/18G/PA). Two shafts were completed in July 1986 and underground connection with Stillingfleet mine was made in July 1989.

Following the cessation of production at the North Selby Mine in 1999, removal of the shafts commenced in September 2000 and the final caps were put on in January 2001.

Fuller Peiser (now BNP Paribas Real Estate) submitted a planning application to the CYC on behalf of UK Coal in March 2000. This sought to relax conditions on the original outline and reserved matters consents that require the North Selby site to be restored to a condition capable of agricultural production and the buildings and machinery to removed. It sought to secure the re-use of buildings for business (B1), general industry (B2), and storage and distribution (B8) uses within the pithead area (9.8 hectares).

The planning application was also submitted to North Yorkshire County Council (NYCC) as the Local Authority boundary passes through the southern part of the North Selby site. However, it was agreed that City of York would act as the lead Authority in the determination of the application, as the larger portion of the site, including the former pithead area and access road, lies within its administrative area.

CYC put the determination of the planning application on hold pending the outcome of a Green Belt review as part of the Local Plan Review. Following the 2004 changes to the planning system, the Local Plan Review was abandoned and work commenced on the preparation of the York Local Development Framework (LDF).

Restoration Condition

The wording of the restoration conditions on the original outline and reserved matters consents is the same as follows:

> *"If use of the two shafts for the purpose of conveying miners and equipment to work coal from the Barnsley Seam is abandoned or shall cease for a period of not less than twelve months, the whole site shall be restored to a condition capable of agricultural production, in accordance with such a scheme as may be approved by the County Planning Authority, and any plant, buildings and machinery shall be removed from the site within twelve months of the relevant date being the date of abandonment or termination of the twelve month period above mentioned."*
>
> The reason given for this condition in both consents was the same, namely *"to safeguard the rights of control of the County Planning Authority in the interest of amenity."*

Currently UK Coal is in discussions with CYC about the drafting of the condition and its enforceability. Depending on the outcome of these discussions, this would impact on whether the site should be regarded as previously developed land.

Renewable Energy Policy

Existing renewable energy policy and guidance is established at a number of levels including International, European, National, Regional and Local. Renewable energy policies at all of these levels carry weight in the determination of planning applications for renewable energy projects.

Such policy and guidance is contained in:

- The Kyoto Protocol
- European Union Renewable Energy Directive 2009
- The Energy White Paper 2003
- The Energy Challenge Report 2006

- Energy White Paper 2007
- The Renewable Energy Strategy 2009
- PPS1: Delivering Sustainable Development (2005)
- PPS1 Supplement: Planning for Climate Change (2007)
- PPS4: Planning for Sustainable Economic Growth (2009)
- PPS7: Sustainable Development in Rural Areas (2004)
- PPS12: Local Spatial Planning 92008)
- PPS22: Renewable Energy (2004)
- Revised Draft Overarching National Policy Statement (NPS) for Energy (EN-1) (2009)
- Revised Draft Overarching National Policy Statement (NPS) for Renewable Energy Infrastructure (EN-3) 2009)
- The Yorkshire and Humber Plan (Regional Spatial Strategy) to 2026
- The saved policies of the Selby District Local Plan (2005)

Need for Renewable Energy

The above documents place clear emphasis on tackling climate change, promoting energy efficiency and increasing renewable energy production. They set out the UK Government's desire to actively encourage renewable energy projects to reduce greenhouse gas emissions and maintain security of energy supplies. Firm emphasis is also placed on changes to the planning system to facilitate improvements to energy infrastructure.

The European Union Renewable Energy Directive sets the UK a binding target of 15% of consumption of energy from renewable sources by 2020. Beyond this, the UK is seeking to achieve an 80% reduction in greenhouse gas emissions by 2050. Policy makes clear that an increase in renewable energy is essential to enable the UK to meet its commitments. Doing so will not only help to prevent climate change and secure and improve future energy supplies by reducing dependence on imported fossil fuels, decrease greenhouse gas emissions, but will also provide outstanding opportunities for the UK economy with the potential to create up to half a million more jobs in the UK renewable sector resulting from around £100 billion of new investment.

The Revised Draft Overarching NPS for Energy highlights that in order to secure energy supplies that enable the UK to meet its renewable energy obligations there is an urgent need for new and particularly, low carbon energy. The NPS advises that there is a need for around 59GW of new electricity generation capacity by 2025. Around 33GW of this would need to come from renewable sources in order to meet the UK's renewable energy commitments.

Location of Renewable Energy

The Revised Draft NPS on Renewable Energy recognises at paragraph 2.5.34 that renewable energy resources can only be developed where the resource exists and where economically feasible.

Under the heading 'Grid Connection' which forms part of the 'Factors influencing site selection by applicants' paragraph 2.5.20 recognises that:

> *"Biomass and EfW electricity generating stations connection into a transmission network. The technical feasibility of exporting electricity from a biomass or waste combustion plant is dependent on the capacity of the grid network to accept the likely electricity output together with the voltage and distance of the connection."*

Paragraph 6.3 of the UK's Renewable Energy Strategy (2009) refers to the need for communities to support renewable energy projects:

"If we are to meet our renewable energy targets and longer-term carbon reduction ambitions. many communities will need to 'host' renewable energy projects such as wind farms, biomass plants or solar rooftop arrays. Individuals and communities can therefore play a key role by supporting large-scale renewable energy projects in their localities, both through their involvement in the formal planning process and through broader support for, and involvement in, developing renewable energy."

The PPS1 Supplement provides at paragraph 20:

"…In particular, planning authorities should:

- *Not require applicants for energy development to demonstrate either the overall need for renewable energy and its distribution, nor question the energy justification for why a proposal for such development must be sited in a particular location,*

- *Ensure any local approach to protecting landscape and townscape is consistent with PPS22 and does not preclude the supply of any type of renewable energy other than in the most exceptional circumstances."*

In terms of renewable energy generation within the countryside, paragraph 16 of PPS7 advises:

"When preparing policies for Local Development Documents and determining planning applications for development in the countryside, LPAs should…provide for the sensitive exploitation of renewable energy sources in accordance with the policies set out in PPS22."

PPS22 issues the following guidelines in relation to renewable energy developments:

- Renewable energy developments should be capable of being accommodated in locations where the technology is viable and environmental, economic, and social impacts can be addressed satisfactorily;

- Regional Spatial Strategies and Local Development Documents should contain policies designed to promote and encourage the development of renewable energy resources;

- Planning authorities should set out the criteria that will be applied in assessing applications for planning permission for renewable energy projects. Policies that rule out of place constraints on the development of all, or specific types of, renewable energy technologies should not be included in Regional Spatial Strategies or Local Development Documents without sufficient reasoned justification;

- The wider environmental and economic benefits of all proposals for renewable energy projects, whatever their scale, are material considerations that should be given significant weight in determining proposals.

Paragraph 15 states that local landscape and nature conservation designations should not be used to refuse permission for renewables projects.

In terms of the retention and re-use of existing energy infrastructure, paragraph 16 is of particular relevance. This states that whilst some uses may not be appropriate on more remote sites in rural areas, the potential for renewable energy development on these sites should not be dismissed:

"……in preparing Local Development Documents…… planning authorities should recognise that some previously developed sites, whilst not being suitable in terms of other land uses (e.g. a site in a remote location……), may offer opportunities for developing some form of renewable energy projects."

There is clear policy recognition of the urgent need for renewable energy development the UK, where the resources exist and where economically feasible, regardless of location. Such resources include a suitable and sufficient grid connection.

In addition to consideration of the need for renewable energy development, the wider environmental and economic benefits of all proposals for renewable energy development are material considerations that should be given significant weight in determining planning applications for such proposals.

Potential of the North Selby Site

In late 2007, discussions began between UK Coal and the University of York with regard to the use of the North Selby site for research and development (R&D) into biorenewable technologies and in particular demonstration and 'scale-up' facilities.

Meetings were held throughout 2007 and 2008 between City of York Council (CYC), UK Coal, the University of York and others to discuss future development proposals for the North Selby site. The meetings explored how the site could be brought forward to meet the University's requirements for biorenewable semi-scale industrial activities to bridge the gap between research and use by industry.

Following further discussions and the involvement of Science City York (SCY), a Concept Paper was produced by the University of York and Science City York in May 2008 which set out;

- What the proposed development would be likely to include
- Possible models for development and operation of the site
- An initial estimate of the scale and nature of research and business activity that could take place on the site
- How the site's existing infrastructure could be developed to support these activities.
- An initial estimate of the number of people that would use the site.

In August 2008, a paper was submitted to CYC providing details of the biorenewables initiatives that Science City York anticipated could be based at the site.

Following this, at a meeting held on 3 October 2008 between CYC, UK Coal and SCY planning officers confirmed the Council's willingness to work with UK Coal to look at the options for the site, particularly in terms of meeting the requirements of the Regional Spatial Strategy's renewable energy policy. CYC requested further information on how the site would be used for generation of electricity through renewable sources.

Public consultation took place at the villages of Escrick and Wheldrake in September and October 2009 at which the proposals for the site were presented.

An EIA Scoping Opinion was received from CYC in September 2009 following a Screening/Scoping request made by BNP Paribas Real Estate.

In late 2009, Peel Environmental entered into a partnership/joint venture arrangement with UK Coal and Science City York with respect to the provision of renewable energy at the site.

UK Coal, Peel Environmental and BNP Paribas Real Estate met with CYC in January 2010 to present proposed Energy from Waste facilities at the North Selby site. Officers expressed interest in these proposals and in February 2010, BNP Paribas Real Estate submitted an initial proposals document to CYC describing the proposed renewable energy (Energy from Waste) facilities for the site.

In June 2010, BNP Paribas Real Estate submitted a revised Screening/Scoping opinion request to the CYC which included the newly proposed Energy from Waste facilities. A Scoping Opinion was received from CYC in July 2010.

Further meetings were held with CYC in late 2010 to receive initial feedback on the proposals and to discuss consultation.

Public exhibitions were held at Escrick and Wheldrake in September and October 2010 and again in January 2011 to provide information on the proposals and obtain feedback from attendees.

Meetings have also been recently held with Selby District Council planning officers, local councillors, and the Chief Executive of Selby District Council about the proposals.

BNP Paribas Real Estate is currently preparing a planning application accompanied by an Environmental Impact Assessment for the North Selby site on behalf of the Partnership. It is anticipated that the planning application will be submitted in Spring 2011.

The Proposed Development

The Partnership (UK Coal, Peel Environmental and SCY is seeking to bring forward proposals for a Renewable Energy Centre at the North Selby site. The £30M centre would be the first of its kind and would transform the site into a world-class facility for biorenewables research alongside energy recovery facilities that will generate heat and renewable electricity. More specifically, the Renewable Energy Centre would comprise:

1. Biorenewables Research Facility - supported by SCY incorporating research, education and incubation space for companies working in the facility.

2. An Energy Recovery Facility – incorporating a gasification plant and anaerobic digestion (AD) plant.

3. Visitor Centre – for both the Biorenewables Research Facility and the Energy Recovery Facility.

Biorenewables Research Centre

It is proposed to use the existing Amenities Block on the North Selby site for the Biorenewables Research Facility. The Amenities Block is a single storey building occupying approximately 4,713 square metres in area. The building will be refurbished and is likely to comprise laboratory and write up space, flexible office/laboratory space, meeting space, an atrium/exhibition/break out space and a conference/educational facility. It is anticipated that the electrical supply for the whole building will be provided via the UK Coal distribution system.

Whilst it is difficult as this stage to provide any specific figures, it is estimated that the numbers of people likely to be based at the Biorenewables Research Centre would include:

- 30 people associated with R&D activities:
- 30 people associated with biorenewables focussed business incubator space
- 10 people associated with the educational aspects of the site and facilities support.

A significant number of staff are likely to split their time between the site and the regional university campuses and business premises.

Energy Recovery Facility

The Energy Recovery facilities are expected to comprise:

- A Waste Gasification Plant, and
- An Anaerobic Digestion (AD) plant.

The particular technology for the gasification plant and the AD plant has not yet been decided. However, the combined facilities will be capable of treating 170,000 tonnes of waste per annum to produce up to around 10MW of power and will utilise the existing site grid connection. This is enough energy to meet the average needs of around 17,000 homes.

Gasification works by shredding residual waste (left after recycling) and passing it into a primary chamber where it is heated in the absence of oxygen to create an energy rich syngas under strictly controlled conditions. The syngas produced is collected and used as a fuel to generate steam, which can be used to generate heat and electricity.

AD can be used to generate electricity or biofuel from organic waste, such as food waste, green waste or agricultural waste. The AD process composts waste in an oxygen free environment to produce biogas. The biogas can be stored for use as a fuel or can be combusted on site to generate electricity.

The Energy Recovery Facility will accept residual commercial and industrial waste from local businesses for the gasification process. The AD facility will compost organic waste, such as food waste, green waste or agricultural waste.

Around 30 workers are expected to be employed at the facility on a shift basis and the facility will operate continuously 24 hours a day, 365 days a year.

Plans are currently being drawn up for the Energy Recovery Facility which will show indicative footprints, scale and building heights.

Visitor Centre

It is intended that a Visitor Centre will be included in the Amenities Block as part of the Biorenewables Research Facility. The Centre will educate a variety of groups of people including local businesses, school children and students about the activities that take place at the site. It will also allow for demonstrations of the work and processes taking place at the site.

It is estimated that the Centre could accommodate up to 50 visitors to the site, bringing the potential number of occupants at the site on any day to up to 150 people per day.

Site of Interest for Nature Conservation

Land to the South of the former North Selby Mine site is proposed to be designated as a new Site of Interest for Nature Conservation. A copy of the latest layout plan of the SINC provided by CYC is enclosed.

Sites of Interest for Nature Conservation (SINCs) are non-statutory sites that are ratified by the relevant SINC Panel and are listed in Local Plans where they receive policy protection.

It is important to recognise that a SINC designation is made purely on established scientific criteria. Existing or future land use is therefore not relevant to the assessment of a SINC's value for wildlife. The designation simply highlights that the site is of value. This does however enable weight to be given to this value when considering what use can be made of that land as part of a planning application and where necessary, allows for mitigation to be established.

Development is not precluded on SINCs, however appropriate consideration should be given to their value and any impact should only be in the overriding public interest and should be avoided or mitigated for. Where damage cannot be avoided, adequate compensation is expected to be made.

PPS9 states that LDFs should identify all nature conservation areas (including SINCs) on the Proposals Map and that criteria based policies should be established in Development Pan Documents (DPDs) within the LDF against which proposals for any development on or affecting such sites should be judged.

In 2006, Defra published a document entitled "Local Sites – Guidance on their Identification Selection and Management". The guidance states that local sites which are selected by a Local Sites Partnership e.g. SINC panel, must be submitted to the Local Authority for inclusion within their LDFs at the earliest opportunity.

Part of the former North Selby site (9.4 hectares) was ratified by the North Yorkshire SINC Panel on 28 July 2010. The site was then approved by CYC's Planning Committee Members on 10 January 2011 for consideration by the Council's Executive for formal recognition as a SINC. Following this, the site was formally recognised by the Executive as a SINC on 1 February 2011. It will now be considered as part of the land allocations made in the York LDF and on any planning applications that may impact upon it.

The majority of the SINC is however located within Selby District Council's administrative area.

Selby's Core Strategy Submission Version Published in January 2011 states that designations of specific areas such as SINCs will be considered in future Development Plan Documents and shown on the proposal maps. Until such time, sites identified in the adopted Selby District Local Plan will continue to be afforded protection.

The Selby Local Plan does not identify the land at the North Selby site as a SINC and the Site Allocations Issues and Options DPD does not propose any new SINC sites. Therefore as it stands the part of the North Selby site SINC within Selby's is not afforded protection.

Representations to Core Strategy Submission Draft

Key Issues and Challenges Chapter

UK Coal **welcomes** the recognition at paragraph 2.9 that the energy sector is a prominent part of Selby's economy and that this is expected to continue.

UK Coal also **supports** the view set out at paragraph 2.43 that 'reinvigorating and developing the District's economy is a major priority and should be facilitated through the retention and creation of new jobs in line with local aspirations, and by ensuring the District continues to be attractive to investment'.

The recognition at paragraph 2.46 that energy, job creation and climate change issues are all key challenges which can be turned into opportunities is fully **supported** by UK Coal.

Spatial Development Chapter

Policy CP1: Spatial Development Strategy

Policy CP1 deals with the spatial location of development. It directs the majority of new development to the towns and more sustainable villages. It also states that development in the countryside will be limited to the replacement, re-use or extension of existing buildings preferably for employment purposes, and to proposals of an appropriate scale which would diversify the local economy.

Whilst UK Coal understands why the Council is seeking to adopt a precautionary approach to the development of sites outside of existing settlements, it should be recognised that in some instances such sites can make important contributions to the District's economic, social and environmental aims.

For example, development in rural areas can provide important local employment opportunities thereby assisting rural regeneration and sustainability. This can be considered against the backdrop in which very strong pressures exist to redevelop existing and allocated employment sites within urban areas for other higher value uses.

Providing employment land within rural areas has the potential to reduce the need to travel for people living in surrounding rural areas, both within the Selby District boundary and beyond in the adjacent rural areas such as York, who travel to more distant urban areas to access job opportunities. This would support the general policy guidance (e.g. PPS3) to reduce the need for people to travel. This needs to be considered against a background in which commuting into the urban area is forecast to increase and in which there are significant capacity constraints associated with highway infrastructure in the urban area.

UK Coal does not object to the requirements set out in the Policy CP1 for the development of sites in the countryside.

UK Coal understands that in accordance with national and regional planning policy the Council is proposing to adopt a sequential approach to distributing land for development i.e. use of urban locations prior to rural locations. Notwithstanding this, there may be instances where urban sites are unsuitable for certain types of development and use of rural sites is more appropriate. For example, the North Selby Mine site lends itself to use as both a biorenewables centre and for renewable energy generation for reasons set out in detail below under 'Representations to Site Allocations Development Plan Document Issues and Options.'

Pursuant to this, UK Coal **supports** the allowance under Policy CP1 for the replacement, re-use or extension of existing buildings in the countryside preferably for employment purposes, and for proposals of an appropriate scale which would diversify the local economy.

It is considered that in accordance with PPS4 that 'employment purposes' should cover a wide range of employment/wealth generating uses and also uses that generate an economic output and therefore not just the traditional 'B' class uses.

Pursuant to this, the Policy is considered to be in line with national planning policy guidance contained in PPS4 and PPS7 and the policy is therefore considered to be **sound.**

Promoting Economic Prosperity Chapter

Paragraph 6.7

UK Coal fully supports the view of Selby's Employment Land Study that Selby is well placed to benefit from overspill of highly skilled knowledge and technology based forms of employment from other parts of the Leeds City Region, and York.

The provision of a world class Biorenewables Research Facility at the North Selby Mine site situated across the boundaries of York and Selby would provide such benefits to Selby. It will house incubator space for high technologies companies as well as university researchers thus helping to diversify the local economy and providing local jobs.

Paragraph 6.16

Paragraph 6.16 recognises that the higher education sector including the expansion of Science City York is an area of identified growth within the sub region and that Selby's proximity to York

and a connection with Science City York could benefit the District and generate employment and growth.

Again, this recognition is **welcomed** by UK Coal. The proposed Renewable Energy Centre at the North Selby site is fully supported by Science City York and will help to continue Science City York's contribution to significant growth in B1(a), (b) and (c) sectors. The development will contribute significantly to Science City York's drive to create and growth of business and employment opportunities across York and North Yorkshire within the fast-growing technology sector of bioscience.

Rural Areas

Paragraph 6.23 identifies a continuing need for local employment in rural communities outside of Selby and Local Service Centres. Paragraph 6.25 goes on to states that in the longer term the accommodation of specific research and development uses along the A19 corridor, north of Selby, may be appropriate if there is a proven need.

The accommodation of research and development uses in the Biorenewables Research Facility at the North Selby is entirely appropriate. The site is recognised by both Science City York and the University of York as the perfect location to carry out necessary biorenewables research and continue to be at the forefront of developing this technology. York is a world-class centre for further and higher education and both York and North Yorkshire should facilitate the continued success of the University of York since the economic benefits will be reaped by both areas.

The location of the Renewable Energy Centre at the North Selby site will mean that Selby can enjoy the benefits of attracting, developing and supporting high technology-based businesses to the site, the retention of a skilled work force within the area, promoting partnerships between industry and other bodies to create the infrastructure that meets the needs of the new economy as well as educating people about science and technology of biorenewables and energy recovery.

Other Employment Activities

Paragraphs 6.26 and 6.27 recognise that supporting the energy sector will assist in reinvigorating, expanding and modernising Selby's economy and that the shift to a low carbon economy will bring huge business opportunities as well as local jobs.

UK Coal fully **supports** this view.

Paragraph 6.28 & 6.29

Paragraphs 6.28 and 6.29 of the Core Strategy refer to the former mine sites at Gascoigne Wood, Whitemoor, Riccall, Stillingfleet and Wistow. However, there is no reference made to the North Selby site. UK Coal **objects t**o this. The North Selby site should be recognised as suitable for re-use as a Renewable Energy Centre and should therefore also be referred to in this section of the Core Strategy.

Policy CP9: Scale and Distribution of Economic Growth

Part (ix) of Policy CP9 supports the re-use of former mine sites outside of the Development Limits for economic activities, including research and low carbon / renewable energy.

UK Coal **supports** this. As stated above, the North Selby site contains significant and rare infrastructure which should be retained, and is vital for renewable energy generation. As this policy allows for these uses on former mine sites, it is considered to be **sound.** This is on the basis that permitting these uses on these sites is considered to be the most appropriate strategy for their future.

Furthermore, allowing for renewable energy generation on these sites will assist in meeting international, national and local objectives and planning policy relating to renewable energy production and tackling climate change.

Policy CP12: Sustainable Development and Climate Change

Policy CP12 states that the council will address the causes and potential impacts of climate change through measures such as giving preference to the re-use of existing buildings and previously developed land. UK Coal **supports** this.

However, it is considered that this policy should also refer to the re-use of the existing grid-connections at the North Selby site. This grid connection (along with other connections at the former Selby Mine Complex sites) allows for the exportation of electricity to the grid and is therefore a significant asset in attracting renewable / low carbon energy developers to the District, and would also therefore assist in meeting renewable energy and carbon reduction targets.

PPS22 states that local planning authorities should exploit the locational requirements of renewable energy technologies. Renewable energy developments require a location with access to large grid connections so that energy generated can be exported to the grid. These types of connections are rare. The Selby Core Strategy should therefore exploit the existence of the large grid connections at North Selby and the other former Selby Mine Complex sites as these existing grid connections would make renewable energy developments on these sites more viable than in other locations due to lower connection costs. These sites are therefore more attractive to renewable energy developers than sites without large connections.

UK Coal therefore requests an additional bullet point is added to Part A of Policy CP12 as follows:

> ***"f) Support the re-use of the large grid connections at the former Selby Mine Complex sites in relation to the generation of electricity by renewable or low carbon sources."***

Improving Resource Efficiency and Renewable Energy Chapter

UK Coal **supports** the recognition at paragraph 7.39 that recovering energy from waste adds value before final disposal.

Policy CP13: Improving Resource Efficiency

UK Coal **supports** this policy on the basis that it seeks to promote increased resource efficiency through requiring Strategic Development Sites and key sites to deliver the majority of their total energy needs from renewable, low carbon or decentralised energy sources including energy from waste.

This policy is considered to be **sound** on the basis that it is consistent with national planning policy guidance contained within PPS1 and PPS22.

Policy CP14: Low Carbon and Renewable Energy

UK Coal **supports** Policy CP14 on the basis that by supporting the full range of available renewable energy and low carbon technology, Selby District Council will help to ensure that a more balanced mix of energy provision is provided within the district thereby contributing to the aims of national planning policy to create a stable and secure energy supply within the UK whilst also contributing to tackling climate change. On this basis the policy is considered to be **sound**.

Notwithstanding this, it is considered that the policy should specifically refer to the potential of utilising the existing infrastructure at North Selby and the other Selby Mine sites to provide renewable/low carbon energy generation.

UK Coal therefore requests that an additional bullet point is added to Policy CP14, as follows:

> ***"e) the existing large electricity grid connections at the former Selby Mine Complex sites for the generation of electricity by renewable / low carbon technologies and the exportation of this electricity to the national grid."***

Chapter 7 Improving the Quality of Life

Paragraph 7.2 states that the Core Strategy policies aim to 'reduce greenhouse gas emissions and protect resources, whilst providing opportunities to exploit realistic alternatives to fossil fuels by promoting renewable energy (which will also combat fuel poverty and improve energy security in the long term).'

UK Coal fully **supports** this aim. As explained above the North Selby site represents an excellent example of a key resource which should be protected and utilised to provide renewable energy generation. The current proposals for the site fulfil this aim by providing proven energy recovery facilities that will generate heat and renewable electricity that can be exported to the grid.

Local Issues

UK Coal **supports** the identification of energy generation as a key local issue.

Policy CP15: Protecting and Enhancing the Environment

Policy CP15 seeks to sustain the high quality and local distinctiveness of Selby's natural and man-made environment via a variety of measures including promoting effective stewardship of the District's wildlife by safeguarding international, national and locally protected sites for nature conservation, including SINCs from inappropriate development.

Whilst UK Coal **supports** nature conservation this needs to be balanced against social and economic needs including the need for renewable energy generation and associated development. Therefore the protection and maintenance of the environment, in particular of non-statutory sites (which are of a lesser quality than internationally and nationally important sites) should not prevent such development from going ahead. Development should not be precluded on SINCs, rather consideration given to avoidance or mitigation of negative impacts.

As such in order to make the policy more flexible and therefore **sound** it is suggested that it is amended as follows:

> ***"a) safeguarding international and national protected sites for nature conservation from inappropriate development and ensure that development on locally protected sites for nature conservation including SINCs avoids or mitigates for negative impacts."***

Representations to Site Allocations Development Plan Document Issues and Options

The Site Allocations Issues and Options Document does not currently allocate the former North Selby Mine Site for a particular use.

UK Coal considers that the site should be taken out of the Green Belt and allocated for a Renewable Energy Centre as described above.

Suitability of the Site for a Renewable Energy Centre

The North Selby site is highly suitable for a Renewable Energy Centre for the following reasons:

Grid Connection

As explained under the 'Site Services & infrastructure' Section above, the site has an existing substantial rare connection to the electricity grid with a capacity of around 12MW. This has a 2 way USP that means that electricity can be exported out of the site as well as being imported in.

This provides a rare opportunity to use the existing infrastructure at the site to generate low carbon energy on the site which can be can import electricity back into the grid to contribute to the increased requirements for energy generation without the need for need facilities and infrastructure to be constructed. Accordingly, with the support of City of York Council, UK Coal has worked in partnership with Peel Environmental to explore the options for providing renewable energy generation at the site which utilises the existing grid connection to export electricity.

Existing Buildings

The existing buildings at the site are constructed to a high modern standard of design and finished in attractive brickwork.

The Amenity Block building at the site is highly suitable for use as laboratory space, demonstration and office space by researchers and high technology knowledge based companies. The layout of the building lends itself to the operation of 'break-out areas' for knowledge sharing. The building therefore provides the opportunity to develop a facility for Biorenewables research which would utilise the expertise of the University of York, other regional universities and a variety of the growing number of high technology companies based in and around York and Selby.

Well Screened Nature of the Site

The location of the North Selby Mine in the Vale of York required generous landscaping provision around the operational area. This consists of woodland and embankments which have now been established to provide an attractive visual and acoustic screening, as well as ecological interest.

Whilst the site is located in the countryside and close to the village of Escrick, it is well back from the A19 and is well screened from the surrounding countryside by the landscaping described above. In addition this landscaping would make the site an attractive place to work and to bring people to.

Site Location and Vehicular Access

The site, including the access road from the A19, is in the single ownership of UK Coal. It has good access to the A19 and thereby to the trunk road network. The site is only approximately 15 minutes drive, via the A19, from the University of York campus in York. The site is therefore highly accessible from the University of York.

Car Parking Provision

The site has an existing car park providing spaces for around 250 cars.

Site Size and Layout

The size of the site and its configuration makes it suitable for use as a Renewable Energy Centre incorporating both a Biorenewables Research Facility and an Energy Recovery Facility.

Existing Services

Due to the site's previous use as part of the Selby Mine Complex it benefits from substantial existing services. These are beyond what might be expected at a modern industrial or business park and would be of significant benefit to the Renewable Energy Centre. In addition to the electrical supply they comprise:

- Heating – the site has substantial boilers and a district heating system that heats all the buildings. This offers the potential to use the heat generated from the Energy Recovery Facility to heat the Amenities Block building used by the Biorenewables Research Facility.

- Water – the site benefits from a good supply of portable water sourced from boreholes on site.

- Sewage – the site has its own on-site sewerage treatment facilities and a Water Balancing System.

Availability of Local Waste Supply

PPS10 encourages the application of the 'Proximity Principle' whereby waste management facilities are located close to where the majority of waste is generated. Accordingly, the site has been chosen by Peel Environmental because there is a good source of waste within the local area including from businesses in York, Selby and Harrogate. The Energy Recovery Facility will therefore be a local facility designed to meet the needs of the local area.

Sustainability

As explained above, the site benefits from extensive services, which, do not therefore have to be provided, and which to remove, if the site was closed down, would be wasteful of resources. Finally, of course the site is a previously developed site with a number of good quality buildings, the re-use of which would be more sustainable than closing them down.

Benefits of the Proposed Development

The development of the site for a Renewable Energy Centre would bring a significant number of benefits to the local area including:

Inward Investment

The Renewable Energy Centre would bring an investment of around £30M providing a boost to the local economy.

Job Creation

It is estimated that around 100 jobs will be created at the Renewable Energy centre including research jobs, biorenewables incubator jobs, educational and facilities management jobs. In addition to this further indirect jobs will be created by the development.

Diversion of Waste from Landfill and Reduction in Greenhouse Gas Emissions

Disposal of biodegradable waste to landfill results in emissions of methane, a powerful greenhouse gas which adds to global warming. Methane emissions from biodegradable waste in landfill account for around 40% of all UK methane emissions and around 3% of all UK greenhouse gas emissions. Methane is 23 times more damaging a greenhouse gas as carbon dioxide.

On the other hand, recycling waste and recovery of energy from it can preserve unused materials and reduce the use of fossil fuels (coal, oil, natural gas) thereby reducing greenhouse gas emissions.

By increasing energy recovery from waste there is considerable scope to reduce greenhouse gas emissions from waste produced.

Not only does energy recovery decrease dependence on landfill which decreases the amount of methane produced by landfill sites, it also results in a reduction in the use of fossil fuels by

producing energy for the grid. Furthermore, there is also a reduction in the use of fossil fuels through the use of the district heating scheme thereby decreasing the Biorenewables Research Facility's reliance on fossil fuels for heating.

Local Renewable Energy Targets

The production of up to 10MW of renewable electricity at the site will help to achieve local renewable energy targets which in turn will help the UK to achieve its renewable energy targets and future energy needs and help in the challenge of combating climate change.

Source of Electricity Generation

Energy from Waste is a safe and reliable method of energy recovery. It generates more renewable electrical power than any other form of waste management option whilst avoiding carbon dioxide from fossil fuel combustion and methane from landfill.

There are a number of advantages of turning waste into electricity over fossil fuel consumption, including the fact that the energy source is domestic and produced close to home and that there is a stable waste supply which is not as volatile as fossil fuels.

World Class Biorenewables Research Facility

Yorkshire and Humber has world-class research expertise in biorenewables, and has the industrial infrastructure and innovation capacity to gain competitive advantage in emerging global markets.

The site will provide a world-class facility that enables biorenewables research to be 'scaled-up' so as to be tested at a commercial scale, bridging the gap between research activities and full scale industrial processes.

Biorenewables are fuels, materials and speciality chemicals made from things that can be grown. The research facility will enable solutions for biorenewables projects to be developed and biorenewables companies to grow their ideas in the best possible environment.

The facility will also educate people about the science, technology and worldwide benefits of biorenewables.

The University of York and SCY recognise that the redevelopment of the site provides an opportunity to bring forward world-class research in sustainability science, improve technology transfer and raise the profile of science and innovation within the region.

SCY is well positioned to represent the needs of the region's research base, and to draw in industrial engagement to ensure maximum benefit from the proposed research facility.

Both gasification and anaerobic digestion are advanced waste treatment processes and are relatively new to the UK. Therefore research into these technologies is both necessary and valuable. The proximity of the energy recovery facility with the biorenewables research facility enables valuable research into these technologies to be carried out. Research opportunities such as the following will be possible:

- Energy Crops – research into the gas/power yields achieved by different types of energy crop (both AD and gasification) along with improved knowledge of operational issues associated with the different types of crop.

- Bio-methane – research into effective methods of upgrading biogas to bio-methane for injection into the gas grid or further on site use in research into bio-methane fuel cells.

- Land Remediation – the site itself allows for land remediation to be demonstrated and allows testing of the AD plant digestate as an appropriate soil improver before using on other sites.

- Syngas research – with appropriate design, the gasification plant could be used to research the influence of various operational parameters on the energy content of the syngas produced; methods for accurate syngas sampling and testing; and pilot plant scale conversion of syngas to other products such as fuel.

The Energy Recovery Facility will be integrated with the Biorenewables Centre allowing for the exportation of heat.

Local Community Benefits

UK Coal, Peel Environmental and Science City York are currently setting up a Community Liaison Group which will explore the potential for local community benefits provided by the development. Possibilities include a local community fund, cheap bottled gas for sale to the local community, provision of fertiliser, public access and educational events.

Taken together, all of the above factors provide a compelling case for the allocation of the former North Selby Mine site for a Renewable Energy Centre.

Conclusion

The North Selby site is one of the five mines that form the former Selby Mine Complex, which was at the time it was developed, the world's largest underground coal mine. The site is located in a strategic location, close to the highway network.

The majority of the North Selby site falls within the City of York Council local authority administrative area. However, the part of the southern part of the site falls within Selby District Council's local authority administrative area.

UK Coal, in partnership with Peel Environmental and supported by Science City York is seeking to bring forward proposals for world class Renewable Energy Centre at the North Selby site. The £30M centre would be the first of its kind and would transform the North Selby site into a world-class facility for biorenewables research alongside energy recovery facilities that will generate heat and up to 10MW of renewable electricity.

In addition to other factors, the North Selby site has existing significant services and infrastructure including a rare large grid connection, which makes it ideally suited to reuse as a Renewable Energy Centre.

Planning policy fully supports renewable energy development and the Renewable Energy Centre would help to fulfil many of the Selby LDF's key objectives and bring a significant number of benefits to the region and including job creation, renewable energy provision, diversion of waste from landfill, world class research facilities and educational and community benefits.

As such the Selby LDF should fully support the proposals for the Renewable Energy Centre and allocate the part of the North Selby site within the Selby administrative area accordingly.

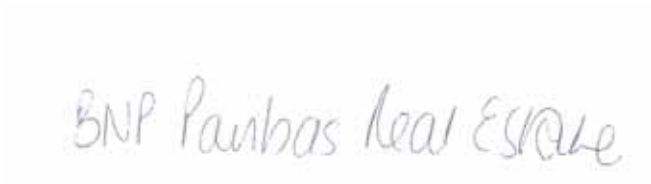
UK Coal reserves the right to amend these representations or withdraw them if necessary.

We trust the above is clear, however if you have any queries then please do not hesitate to contact either Claire Harron or John Dunshea at the above office.

BNP PARIBAS
REAL ESTATE

Finally, we would be grateful if you would acknowledge receipt of these representations and confirm that they have been duly made.

Yours faithfully

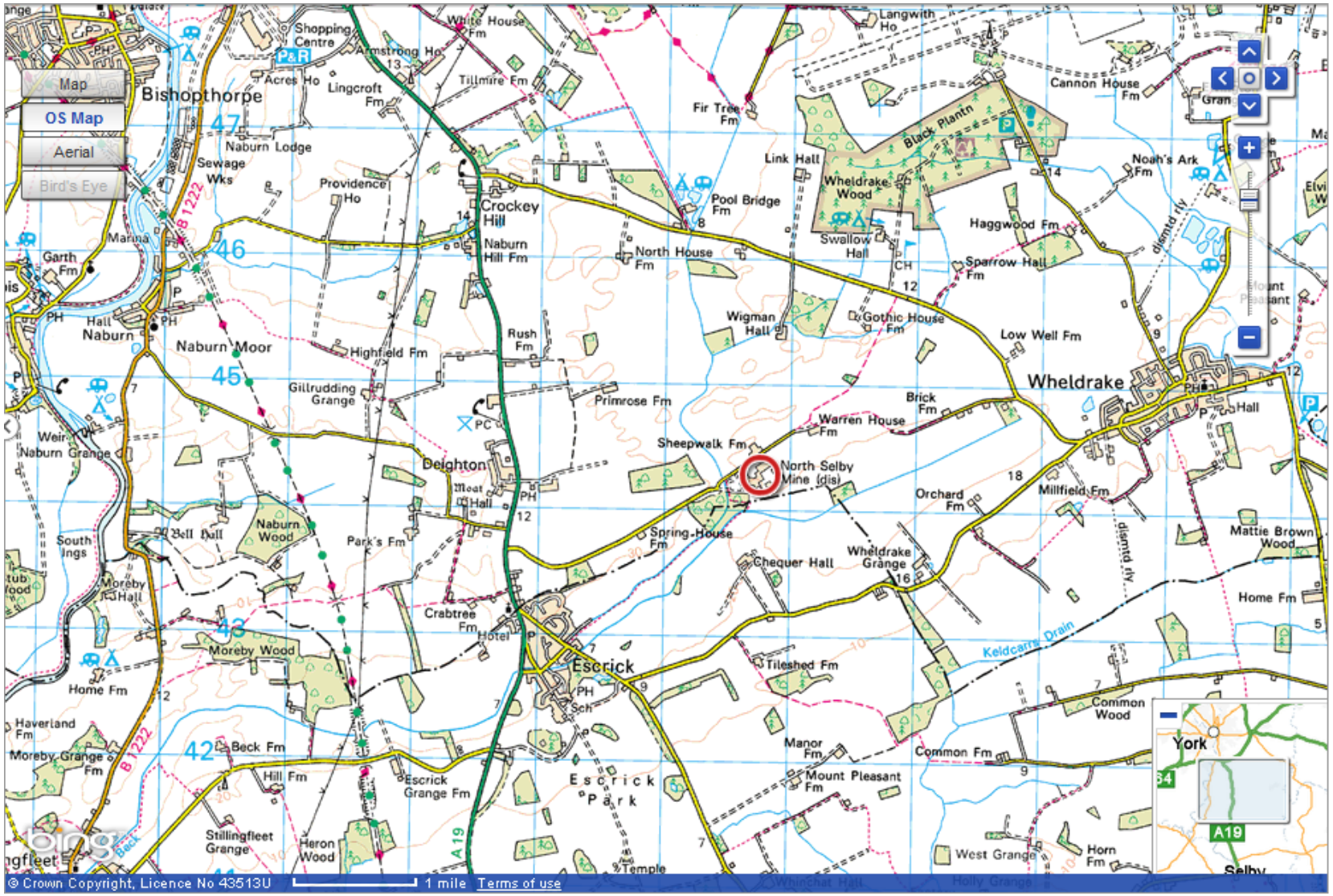


BNP Paribas Real Estate

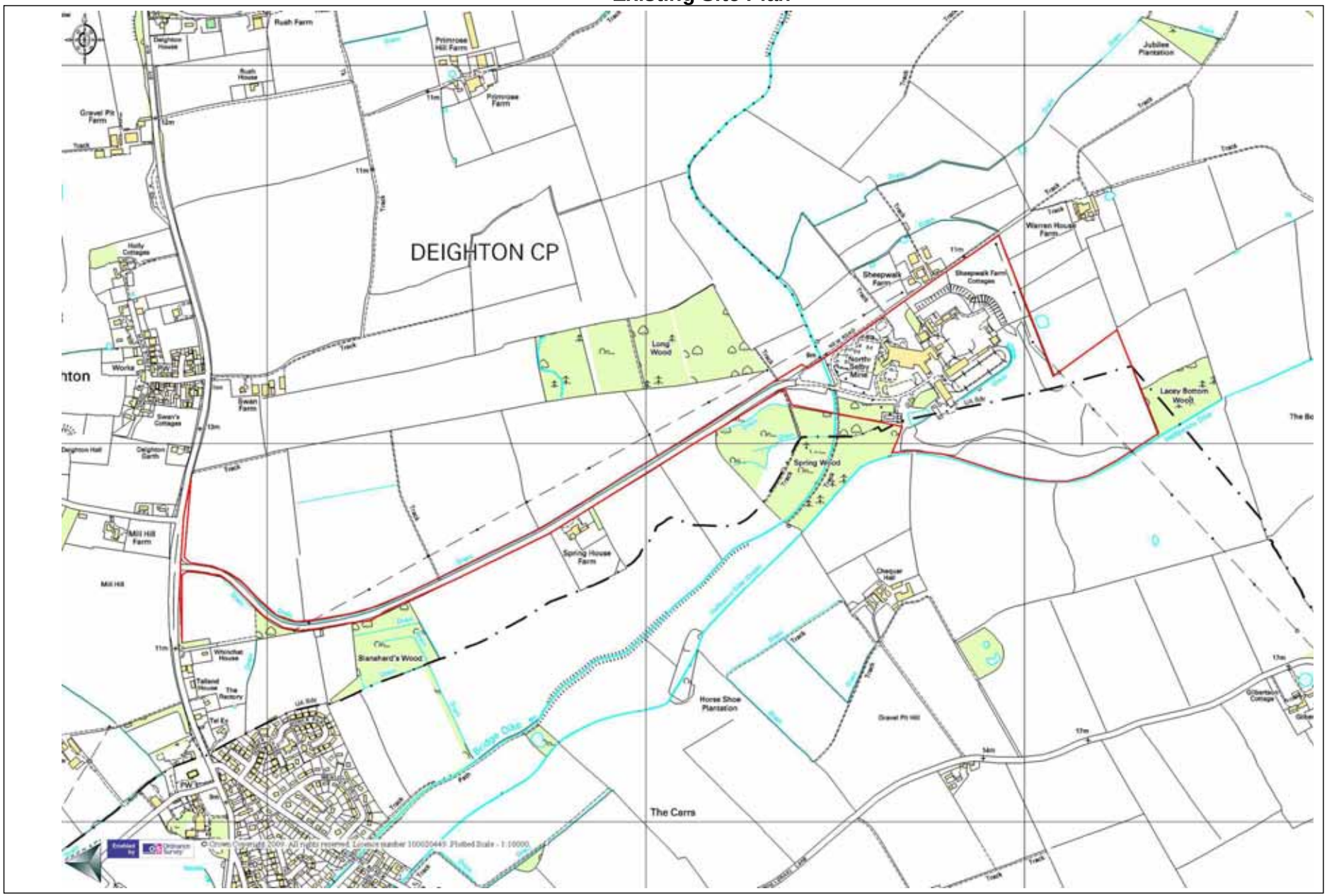
Enc.

Copy – Mr E Peat, UK Coal

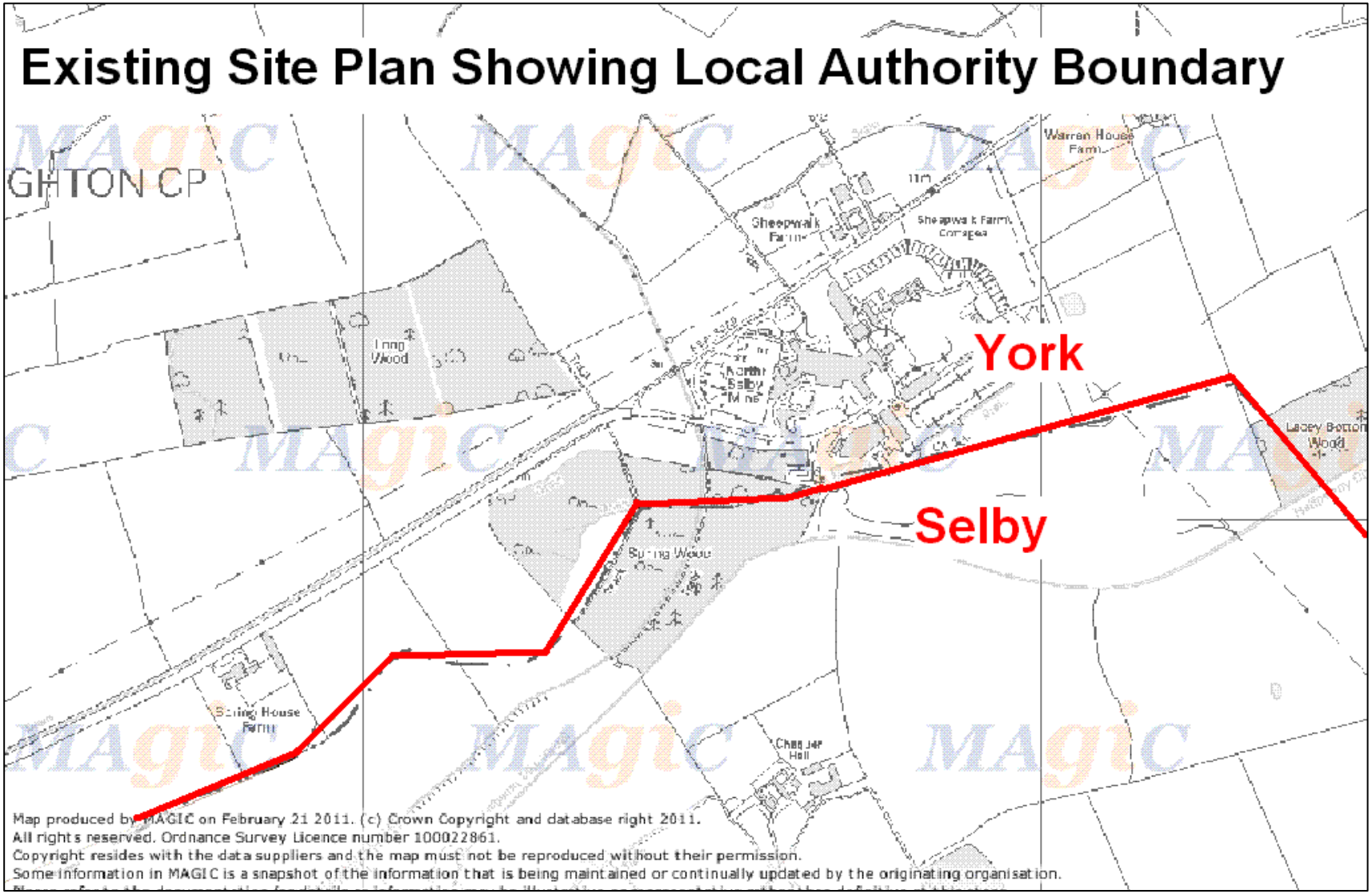
North Selby Site Location Plan



Existing Site Plan



Existing Site Plan Showing Local Authority Boundary



SINC Layout Plan