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CENTRAL SERVICES
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Your ref:
Our ref: PBF L090212

09 February 2012

Dear Sirs

SELBY LOCAL DEVELOPMENT FRAMEWORK PROPOSED CHANGES TO THE SUBMISSION DRAFT CORE STRATEGY

REPRESENTATIONS ON BEHALF OF HARWORTH ESTATES – FORMER SELBY MINE COMPLEX SITES

We have been instructed by our client, Harworth Estates (the property division of UK Coal plc), to submit representations to the proposed changes to the Submission Draft Core Strategy in respect of the former Selby Mine Complex sites. These sites include:

- The Gascoigne Wood Interchange ("the Gascoigne Wood site");
- The Riccall Business Park ("the Riccall site");
- The Whitemoor Business Park (the Whitemoor site");
- Former Stillingfleet Mine ("the Stillingfleet site"); and
- Former Wistow Mine ("the Wistow site").

All five sites are considered to be significant economic, environmental and social assets within the Selby District that offer a major opportunity to contribute to the District's employment needs and meet renewable energy requirements. Details of each of the sites are provided below and location plans are enclosed for your information.

Site Descriptions

Gascoigne Wood Site

The Gascoigne Wood site is located to the west of the Selby District and outside the Environment Agency's defined flood zone. It is approximately 3 km (2 miles) by road from the local service centre of Sherburn in Elmet, and immediately adjacent to the Sherburn Industrial Estate. It is connected to the wider road network by the B1222 and A162 which connects to the A63 and A1 approximately 10 km (6 miles) to the west.

Harworth Estates' landholdings at the Gascoigne Wood site extends to approximately 256 hectares (633 acres), of which approximately 44 hectares (109 acres) has been identified as developable. The existing buildings have an approximate floor area of 250,000 sq ft (23,225 sq m). These are

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complimented by significant roadways, infrastructure and landscaping provision. Integral to the infrastructure provision is the extensive rail sidings, which allow access to the local and national rail network.

The other site infrastructure includes a significant large grid connection which is rare in the locality, telecommunications connections, water supply, on site sewerage, treatment plant and oil and grit surface water run-off interceptors. It should also be noted that importantly, the existing grid connection allows for the exportation of any energy generated at the Gascoigne Wood site in the future to the electricity grid.

Approximately 210,000 sq ft (19,500 sq m) of the buildings at the Gascoigne Wood site was let to British Gypsum in 2008 for the storage of raw materials within the existing industrial shed. The raw material is transported to the Gascoigne Wood site from the Drax Power Station by trains operated by DB Schenker (formerly EWS), which has been renting the rail sidings since 2008.

This letting to British Gypsum is on a short to medium term basis and the site is currently being marketed to attract a long term occupier. This letting, and the interest generated as part of the marketing, demonstrates the continued demand for rail linked employment facilities, as well as the growing importance of rail distribution in the UK.

In addition, the workshop and stores building (approximately 20,000 sq ft (1,850 sq m)) are currently let to Newgen Recycling Ltd. The company utilises the buildings and outside storage area for the recycling of tyres and the manufacturing of related products.

There are approximately 30 people employed on the Gascoigne Wood site. However, Newgen is not currently in full production and this number is therefore likely to increase.

The Gascoigne Wood site is a strategically important employment site, with excellent existing infrastructure, including:

- The existing rail connection, which is rare in the Region 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; and
- The significant existing connection to the electricity grid which allows energy generated on the site to be fed straight back into the grid.

It is therefore evident that the re-use and potential 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. It is important to note that this investment has the potential to be of regional, national or international scale due to the limited inter-modal employment development opportunities across the UK. Such investment could offer significant benefits to the local, as well as wider regional and national economy.

In addition, interest has been received for the development of a solar photovoltaic farm on part of the Gascoigne Wood site. A key driver behind this is the close proximity of the significant existing grid connection. This means the renewable energy generated can be exported back into the grid, without the significant costs and environmental impacts that would be associated with constructing the underground connection cables over longer distances or the establishment of a new grid connection.

The Riccall Site

The Riccall site is located to the north of the Selby District, approximately 2 km (1 mile) to the south of the primary village of Riccall and approximately 6 km (4 miles) to the north of Selby Town Centre. It is located immediately to the east of the A19, which connects with York and the A64 to the north, and Selby, the A63 and M62 to the south.



Harworth Estates' land ownership at the Riccall site extends to approximately 42 ha (104 acres). Approximately 9 ha (22 acres) of this has been converted to a mixed use business park of office and industrial units. The existing buildings have an approximate floor area of 74,000 sq ft (6,800 sq m) and are linked to the significant road ways, infrastructure and landscaping provision. The on site infrastructure provision includes a significant electricity supply, telecommunications connection, water supply, sewage treatment plant, and oil and grit surface water run off interceptors.

The office and industrial units at the Riccall site have been let to a number of local businesses, resulting in the majority of these now being occupied. This illustrates the demand in the Selby District for the affordable, flexible employment provision on offer at the Riccall site to meet local needs in the Selby District, particularly small / start up companies because of uncertainties regarding their occupation needs. Accordingly, the easy in, easy out terms offered are vital to allow businesses to grow and contract dependant on performance. There are currently 85 people employment on the Riccall site.

The site also offers a large grid connection, the size of which is not readily available at other comparable employment sites in Selby and should be protected.

Harworth Estates intends to continue to grow and develop the Riccall site as a successful business park. This includes the potential for future redevelopment and expansion to meet local needs.

The Whitemoor Site

The Whitemoor site is located to the east of the Selby District, approximately 6 km (4 miles) east of the primary village of Barby and approximately 9 km (6 miles) north east of Selby Town Centre. It is connected to the wider road network via the A613 to the north which connects with the A19 to the west (see attached Location Plan).

Harworth Estates' land ownership at the Whitemoor site extends to approximately 20 ha (50 acres) of which approximately 9 ha (22 acres) have been converted to a mixed use business park of office and industrial uses. The buildings at the site extend to approximately 70,000 sq ft (6,500 sq m). These are complimented by significant road ways, infrastructure and landscaping provision. The onsite infrastructure includes a significant power supply, telecommunications connections, water supply, sewerage treatment plant and oil and grit interceptors.

The majority of the office and industrial units at the Business Park are let to a variety of local businesses, and approximately 80 people are employed on the site. Again, this illustrates the demand for the affordable, flexible office and industrial space on offer at the business park to meet local needs in the District.

As with the Riccall site, the Whitemoor site is well suited to meet the needs of small / start up companies due to the flexible terms and accommodation on offer. The site's significant grid connection is also an important asset which should be protected and was integral in securing Ecoplas as a tenant, due to energy intensive nature of their PVC recycling business.

Harworth Estates therefore intends to continue to grow and develop the Whitemoor site as a successful business park, with the potential for future redevelopment and expansion to meet local needs.

The Stillingfleet Site

The Stillingfleet site is located to the north of the Selby District, approximately 5 km (3 miles) to the east of Stillingfleet Village, 5 km (3 miles) from the primary village of Escrick and approximately 12 km (7 miles) south of York City Centre. It is connected to the wider road network by the B1222 which connects with the A19 to the east.



Harworth Estates' land ownership extends to approximately 32 ha (79 acres) in area, with an operational area of approximately 8 ha (20 acres). The existing buildings at the Stillingfleet site have an approximate floor area of 67,500 sq ft (6,270 sq m). These are complimented by significant road ways, infrastructure and landscaping provision. The on-site infrastructure includes:

- A substantial and regionally significant connection to the electricity grid, with a capacity of around 12 MW, which as a result of its connections to the other former Selby Mine Complex sites forming the Selby Mines Electricity Ring represents a secure power supply;
- Mine gas methane electricity generators;
- A self-contained waste water treatment plant;
- An established surface water drainage system;
- Existing heating plant and equipment; and
- A bore hole providing water supply.

It should also be noted that importantly, the existing grid connection allows for the exportation of energy generated at the Stillingfleet site to the electricity grid.

As stated above, the on-site infrastructure includes mine gas methane electricity generators. This electricity generation is served by the existing infrastructure at the site, particularly in terms of electricity connection, water supply, sewage treatment plant, vehicular access, etc. It is therefore important that the infrastructure at the Stillingfleet site which supports the electricity generation is retained to ensure that the generation of electricity is not prejudiced.

Harworth Estates is currently investigating the potential for the alternative more sustainable re-use of the Stillingfleet site linked to the Mine Gas Methane Electricity Generation. In particular, the existing 12 MW connection to the electricity grid represents a rare and regionally significant economic and environmental asset. This offers a dedicated, substantial and secure power supply, as well as the ability to export infrastructure to the grid. In addition, as with the Gascoigne Wood site, interest has been received for the development of a solar photovoltaic park on the Stillingfleet site. Again, the site's large grid connection is a key driver behind this interest.

The Wistow Site

The Wistow site is located to the north of Selby District, approximately 0.5 km (1 mile) to the east of the primary village of Wistow and south of the primary village of Cawood. It is approximately 9 km (5 miles) to the east of the local service centre of Sherburn in Elmet. It is connected to the wider road network via the B1222 and A612 that connect to the A63 and A1 to the west.

Harworth Estates' land ownership at the Wistow site extends to approximately 12 ha (30 acres), of which approximately 6 ha (15 acres) is operational land. The existing buildings have an approximate floor area of 30,000 – 35,000 sq ft (2,800 – 3,250 sq m). These are complimented by significant roadways, infrastructure and landscaping provision. The onsite infrastructure provision includes:

- A substantial and regionally significant connection to the electricity grid, with a capacity of around 12 MW, which as a result of its connections to the other former Selby Mine Complex sites forming the Selby Mines Electricity Ring, represents a secure power supply;
- A self-contained waste water treatment plant;
- An established surface water drainage system;
- Existing heating plant and equipment; and
- A bore hole providing water supply.

It should also be noted that importantly, the existing grid connection allows for the exportation of energy generated at the Wistow site in the future to the electricity grid.



As with the Gascoigne Wood and Stillingfleet sites, Harworth Estates is currently investigating the potential for the alternative more sustainable re-use of the Wistow site in connection the re-use of the existing 12 MW connection to the electricity grid.

Previous Representations

We previously submitted representations to the Selby Local Development Framework (LDF) Core Strategy in December 2008 and April 2010.

Representations were also submitted to the Core Strategy Submission Draft in February 2011 and BNP Paribas Real Estate attended the Core Strategy hearing sessions into Matters 2, 7 and 6 in September 2011. These representations are summarised below:

Matter 2

Harworth Estates supported Part A of Policy CP1 which allowed for the re-use of buildings in the countryside for employment uses as it was considered that this was consistent with policy in Planning Policy Statement 4: "*Planning for Sustainable Growth*" (PPS4) and Planning Policy Statement 7: "*Sustainable Development in Rural Areas*" (PPS7). However, it was considered that, on the whole this policy was unsound, as it should also allow for the re-use of buildings in the countryside for housing, in line with Planning Policy Statement 3: "*Housing*" (PPS3).

Matter 6

Harworth Estates supported Policy CP9 and CP10, which encouraged rural diversification and the expansion and re-use of existing appropriately located premises in rural areas. In particular, Harworth Estates supported Part (xi) of Policy CP9 which stated that the re-use of former mine sites outside of Development Limits would be supported. However, an objection was made to Paragraph 6.29, which stated that the Stillingfleet and Wistow sites are not suitable for large scale re-use / intensive activities due to their remoteness. It was considered that this paragraph was unnecessarily negative and over-restrictive. It was also considered that as these sites contain significant valuable infrastructure that warrants re-use for employment or renewable energy uses, and therefore dismissing their re-use would not be the most appropriate strategy.

Matter 7

Harworth Estates supported Policy CP12 which gave preference to the re-use of existing buildings and previously developed land. However, in order for the Policy to be consistent with other policies in the Core Strategy it was requested that it made reference to supporting the re-use of the existing grid connections at the former Selby Mine Complex sites for low carbon / renewable energy generation.

Harworth Estates objected to Policy CP14 as it did not support the re-use of the grid connections at the Stillingfleet and Wistow sites. It was therefore considered that this Policy was not the most appropriate strategy for meeting the District's renewable / low-carbon energy needs. It was therefore requested that this policy was amended to make reference to, and support the re-use of the electricity infrastructure at the Stillingfleet and Wistow sites.

Proposed Changes to Submission Draft Core Strategy

Following the hearing sessions held in September 2011, the Inspector suspended the Core Strategy Examination in order for the Council make amend the Core Strategy to address the following issues:

- The strategic approach to Green Belt releases;
- The scale of housing and employment development proposed for Tadcaster and the implications for the Green Belt; and



- The overall scale of housing development over the plan period.

Selby District Council has now made amendments to the Submission Draft Core Strategy around the above topics. The proposed changes which are considered relevant to the former Selby Mine Complex sites are the following proposed amendments to Policy CP9:

- Changes to Part (v) to replace text, which states that existing employment sites will be safeguarded, with text that now states that established Employment Areas will be safeguarded. This change has been made to clarify that protection is not extended to all existing employment sites; and
- Changes to Part (ix) which now supports the re-use of buildings and infrastructure on the Former Selby Mine Complex sites rather than supporting the re-use of the sites as a whole. This change has been made to clarify that the re-use of the existing buildings and infrastructure on these sites will be supported.

Please find below Harworth Estates' representations on these proposed changes to Policy CP9.

Representations on the Proposed Changes to Submission Draft Core Strategy Policy CP9

Harworth Estates supports the proposed changes to Policy CP9. In particular, Harworth Estates supports the proposed changes to Part (ix) which allows for the re-use of buildings and infrastructure on the former Selby Mine Complex sites.

The former Selby Mine Complex sites contain valuable infrastructure that warrants re-use. These include self-contained waste water treatment plants, established surface water drainage systems, existing heating plant and equipment, and bore holes providing water supply. The sites also contain substantial rare and substantial, regionally significant connections to the electricity grid with capacities of around 12 MW. In addition, the Gascoigne Wood site is served by rail sidings and the Stillingfleet site contains mine gas methane generators.

The former Selby Mine Complex sites therefore offer potential to significantly contribute to the District's economy in terms of the following:

- Maximising opportunities for low carbon / renewable energy generation;
- Promoting more sustainable movement of materials by rail;
- Creating jobs to reduce out-commuting of residents from rural areas and enhancing rural employment opportunities;
- Providing opportunities for development on land which is not constrained by flood risk; and
- Providing affordable and flexible employment space to meet local needs.

In particular, it is considered that the re-use of the infrastructure on the former Selby Mine Complex sites would be the most appropriate strategy for distributing economic growth and renewable / low-carbon energy development as well as the sustainable movement of freight in the District, and consistent with national policy and other policies in the Core Strategy. It is therefore considered that Policy CP9, as proposed to be amended, would be "**sound**". The reasons for this are set out below.

1. Employment

The Riccall, Whitemoor and Gascoigne Wood sites are existing employment sites. Riccall and Whitemoor offer flexible working space for smaller and local firms. It is considered that the re-use of the existing buildings and infrastructure on the remainder of the former Selby Mine Complex sites for employment uses would also be suitable and offer similar benefits.

In particular, the former Selby Mine Complex sites would be suitable for companies that require large volumes of electricity, such as Ecoplas which is a current tenant on the Whitemoor Business Park site and requires significant amounts of electricity to undertake



its PVC recycling operation. The large capacity electricity grid connections on the former Selby Mine Complex sites, which allow for large volumes of electricity to be taken from the electricity grid, are rare and costly to install. These sites are therefore attractive locations for companies that require such connections to the electricity grid due to the presence of the existing grid connections on the site. The security of supply provided by the Selby Mines Electricity Ring is also an additional factor which makes these sites attractive for such uses, including data centres.

In addition the former Selby Mine Complex sites are also suitable locations for employment uses which may not be suitable within urban areas, such as those which may create nuisance to neighbouring properties, particularly residential properties. The sites have little neighbouring properties and therefore would be suitable locations for such uses (for example industrial uses which may produce noise or other emissions).

Planning Policy Statement 4: *"Planning for Sustainable Economic Growth"* (PPS4) encourages economic development in rural areas. It states that economic growth should be encouraged in rural areas to diversify the rural economy and to reduce the need for rural residents to commute long distances to urban areas to access employment opportunities. The need to provide employment opportunities in rural areas is also noted in Planning Policy Guidance 13: *"Transport"* (PPG13):

"In order to reduce the need for long-distance out-commuting to jobs in urban areas, it is important to promote adequate employment opportunities in rural areas."

Notwithstanding the above, PPS4 and other national planning policy statements also require that the countryside is protected from encroachment and therefore encourage the re-use of existing buildings in rural areas for employment uses.

The 2009 Selby Retail, Commercial and Leisure Study identified that there is potential for job creation in the District over the LDF period, including provision in rural areas. In addition, Paragraph 6.23 of the Submission Draft of the Core Strategy stated that there is a continuing need for local employment opportunities in rural communities in the District.

Re-use of the buildings and infrastructure at the former Selby Complex Mine sites therefore offers the potential to meet rural employment needs and diversify the rural economy of the District whilst still protecting the countryside from further encroachment or inappropriate built development.

It is therefore considered that re-use of the buildings and infrastructure on the former Selby Mine Complex sites would be the most appropriate strategy for meeting rural employment needs and also be in accordance with planning policy on employment development and sustainable transport.

2. Renewable / Low-Carbon Energy Generation

As stated above, the sites contain large electricity grid connections. These connections allow for electricity to be exported back to the grid. Any electricity generated on the site could therefore be fed back into the grid demonstrating the sites' suitability for energy production, and in particular, renewable / low carbon energy production.

The rarity of such grid connections is recognised as one of the major constraints to the growth of the renewable / low-carbon energy sector in the UK due to the high costs associated with installing such connections, which can reduce the viability of some schemes.



Paragraph 1 of Planning Policy Statement 22: "*Renewable Energy*" (PPS22) states that local development documents should not restrict the development of renewable energy development in locations where the technology is viable. The existing high capacity grid connections on the former Selby Mine Complex sites therefore offer the potential for the site's to play a significant role in meeting the District's renewable / low carbon energy needs.

Selby District Council is signatory to the Nottingham Declaration on Climate Change, and is committed to contributing to the delivery of the national climate change programme by preparing a plan to address the causes and effects of climate change. Part of this involves promoting renewable / low carbon energy generation. Therefore allowing for the use of the former mine sites for renewable / low carbon energy production would assist in meeting this declaration.

In addition to the above, the sites' location within the countryside should not preclude renewable / low-carbon energy development on the sites. Paragraph 16 of PPS22 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."

In light of the above, it is considered that promoting the use of the infrastructure on the former Selby Mine Complex sites would be the most appropriate strategy for meeting the District's renewable / low-carbon energy needs and would also be in accordance with PPS22.

3. Sustainable Movement of Freight

In addition the above, the Gascoigne Wood site offers the potential for the sustainable movement of freight due to the sites rail sidings which provide access to the local and national rail network. These sidings can handle the longest length of train currently used on the network, and as such are a rare resource in the Selby District.

PPG13 states that local planning authorities should identify and protect sites which could be critical in developing infrastructure for the movement of freight, particularly where they would allow for the movement of freight by other means than road.

By supporting the re-use of the buildings and infrastructure at Gascoigne Wood, including the rail sidings, it is considered that Policy CP9 provides the most appropriate strategy for the movement of freight by sustainable means by supporting the re-use of the rail sidings at the site, and would also meet the requirements of PPG13.

Conclusion

Harworth Estates supports the proposed changes to Policy CP9. These changes will support the re-use of the buildings and infrastructure at the former Selby Mine Complex sites. This infrastructure, which includes grid connections of substantial size at all of the sites and rail infrastructure at Gascoigne Wood, is rare in the Region and should therefore be protected and their re-use encouraged.

It is considered that the re-use of the buildings and infrastructure on these sites would have benefits for the rural economy, by providing flexible employment space for local firms and reducing the need for rural residents to commute to urban areas to access employment opportunities. It is



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also considered that the re-use of the infrastructure on these sites, in particular the substantial grid connections, would encourage the development of renewable / low-carbon energy installations. This is due to the significant reductions in cost and environmental impact associated with reusing the existing grid connections compared with providing new connections to the electricity grid. In addition, supporting the re-use of the rail infrastructure and buildings on the Gascoigne Wood site would allow for the sustainable movement of freight by rail, reducing the level of freight traffic on local roads.

In light of the above, it is considered that Policy CP9, as proposed to be amended, provides the most appropriate strategy for employment and renewable / low-carbon energy development and the sustainable distribution of freight. It is also considered that the proposed changes would be consistent with national planning policy, including PPS4, PPG13 and PPS22, as well as other policies in the Core Strategy, which support the re-use of buildings in rural areas for employment uses and promote the development of renewable energy infrastructure where viable.

It is therefore considered that Policy CP9, as proposed to be amended, would be an effective and justified policy, which is consistent with national planning policy, and therefore **"sound"**.

We reserve the right to amend or withdraw these representations if necessary.

Finally, we trust the above is clear and satisfactory; however, if you require further information or would like to discuss the above please do not hesitate to contact either Paul Forshaw or Alex Willis at the above office. Otherwise, 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

Cc Mr T Love – Harworth Estates

Enc Location Plans

Completed Representation Form

Selby District Submission Draft Core Strategy

Consultation on Proposed Changes

January 2012

Representation Form

**Planning and Compulsory Purchase Act (2004), Town and
Country Planning (Local Development) (England) Regulations
2004 and (Amendment) Regulations 2008 and 2009**

Part A

An Examination in Public into the soundness of the Submission Draft Core Strategy (SDCS) was held between 20 and 30 September 2011 in front of an Independent Inspector.

The examination has been suspended to allow the Council to address the following three topics, as set out in the Inspector's Ruling:

- (i) The strategic approach to Green Belt releases;
- (ii) The scale of housing and employment development proposed for Tadcaster and the implications for the Green Belt;
- (iii) The overall scale of housing development over the plan period.

The Council is now carrying out a consultation directly with participants on the changes to the Core Strategy arising from its consideration of these three topics.

Subject to the outstanding matters above, the examination into the other "Matters and Issues" identified by the Inspector has been completed. All parties have had the opportunity to participate in the hearing sessions and the Inspector has the information necessary to enable him to prepare his report. Consequently no further evidence should be submitted to the examination at this stage; any further evidence received by the Programme Officer is likely to be returned.

When the examination resumes, hearing sessions will be arranged which will focus solely on the above matters. As already stated, the suspension should not be used as an opportunity to revisit matters which have been fully considered during the September 2011 hearing sessions.

Representations are therefore invited as part of this consultation on the Proposed Changes to the Submission Draft Core Strategy.

Please complete separate copies of Part B of this form for each of your separate points. It would be helpful if you could focus on the "tests of soundness" and indicate if you are objecting on a legal compliance issue.

**Completed representation forms must be returned to the Council no
later than 5pm on Wednesday 15 February 2012**

Email to: ldf@selby.gov.uk

Fax to: 01757 292229

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

The Tests of Soundness

Soundness is explained in PPS12 (Planning Policy Statement 12) in paragraphs 4.36 - 4.47, 4.51 and 4.52 and the boxed text. Specifically paragraph 4.52 states that to be sound a Core Strategy should be:

1 Justified

PPS12 provides that to be 'justified' a DPD (in this case the 'Core Strategy') needs to be :

- founded on a robust and credible evidence base involving:
 - evidence of participation of the local community and others having a stake in the area
 - research/fact finding - the choices made in the plan are backed up by facts
- the most appropriate strategy when considered against reasonable alternatives

2 Effective

PPS12 states that Core Strategies should be effective. This means:

- Deliverable - embracing:
 - Sound infrastructure delivery planning
 - Having no regulatory or national planning barriers to delivery
 - Delivery partners who are signed up to it
 - Coherence with the strategies of neighbouring authorities
- Flexible
- Able to be monitored

3 National Policy

The DPD (in this case the 'Core Strategy') should be consistent with national policy. Where there is a departure, the Local Planning Authority (LPA) must provide clear and convincing reasoning to justify their approach.

Contact Details (only complete once)

Please provide contact details and agent details, if appointed.

Personal Details		Agents Details (if applicable)
Title		Mr.
First Name		Paul
Last Name		Forshaw
Job Title (where relevant)		Planner
Organisation	Harworth Estates	BNP Paribas Real Estate
Address Line 1	AMP Technology Centre	First Floor, Fountain Precinct
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Telephone No.		0114 263 9207
Email address		Paul.r.forshaw@bnpparibas.com

You only need to complete this page once. If you wish to make more than one representation, attach additional copies of Part B (pages 4 - 6) to this part of the representation form.

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

Part B (please use a separate sheet (pages 4 - 6) for each representation)

Please identify the topic to which this representation refers:

- (i) The strategic approach to Green Belt releases;
- (ii) The scale of housing and employment development proposed for Tadcaster and the implications for the Green Belt;
- (iii) The overall scale of housing development over the plan period.

Please state the specific Proposed Change number: **PC**

(which can be found on the Published Schedule, CD2e)

Question 1: Do you consider the Proposed Change is:

1.1 Legally compliant Yes No

1.2 Sound Yes No

If you have entered No to 1.2, please continue to Q2. In all other circumstances, please go to Q3.

Question 2: If you consider the Proposed Change is unsound, please identify which test of soundness your representation relates to:

(Please note you should complete separate Part B (pages 4 - 6) of this form for each test of soundness you consider the Core Strategy fails.)

- 2.1 Justified (Please identify just one test for this representation)
- 2.2 Effective
- 2.3 Consistent with national policy

Question 3: Please give details of why you consider the Proposed Change is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Proposed Change, or provide any other comments please also use this box to set out your comments:

Please see enclosed letter.

(If you are submitting this form as a hard copy please ensure all text is visible and continue on a separate sheet if necessary)

Question 4: Please provide details of what change(s) you consider necessary to make the Proposed Change to the Submission Draft Core Strategy legally compliant or sound, having regard to the test you have identified in Q2 where this relates to soundness. You will need to say why this change will make the Core Strategy DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

(If you are submitting this form as a hard copy please ensure all text is visible and continue on a separate sheet if necessary)

PLEASE NOTE your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original. ***After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.***

Question 5: Can your representation seeking a change be considered by written representations, or do you consider it necessary to participate at the oral part of the examination?

5.1 Written Representations

5.2 Attend Examination

5.3 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

(Your request will be considered by the Inspector, however, attendance at the Examination in Public is by invitation only).

Harworth Estates is a significant land holder in the Selby District and the content of the Core Strategy would have implications for the future use and development of the Company's landholdings. In particular, the Core Strategy specifically refers to Harworth Estates' former mine sites.

Harworth Estates participated in the previous Examination in September 2011 and commented on some of the policies for which changes are proposed. Harworth Estates therefore requests that it is allowed to participate in the upcoming Examination.

(If you are submitting this form as a hard copy please ensure all text is visible and continue on a separate sheet if necessary)

Representation Submission Acknowledgement

I acknowledge that I am making a formal representation. I understand that my name (and organisation where applicable) and representation will be made publically available during the public examination period of the Core Strategy in order to ensure that it is a fair and transparent process.

I agree with this statement and wish to submit the above representation for consideration.

Signed

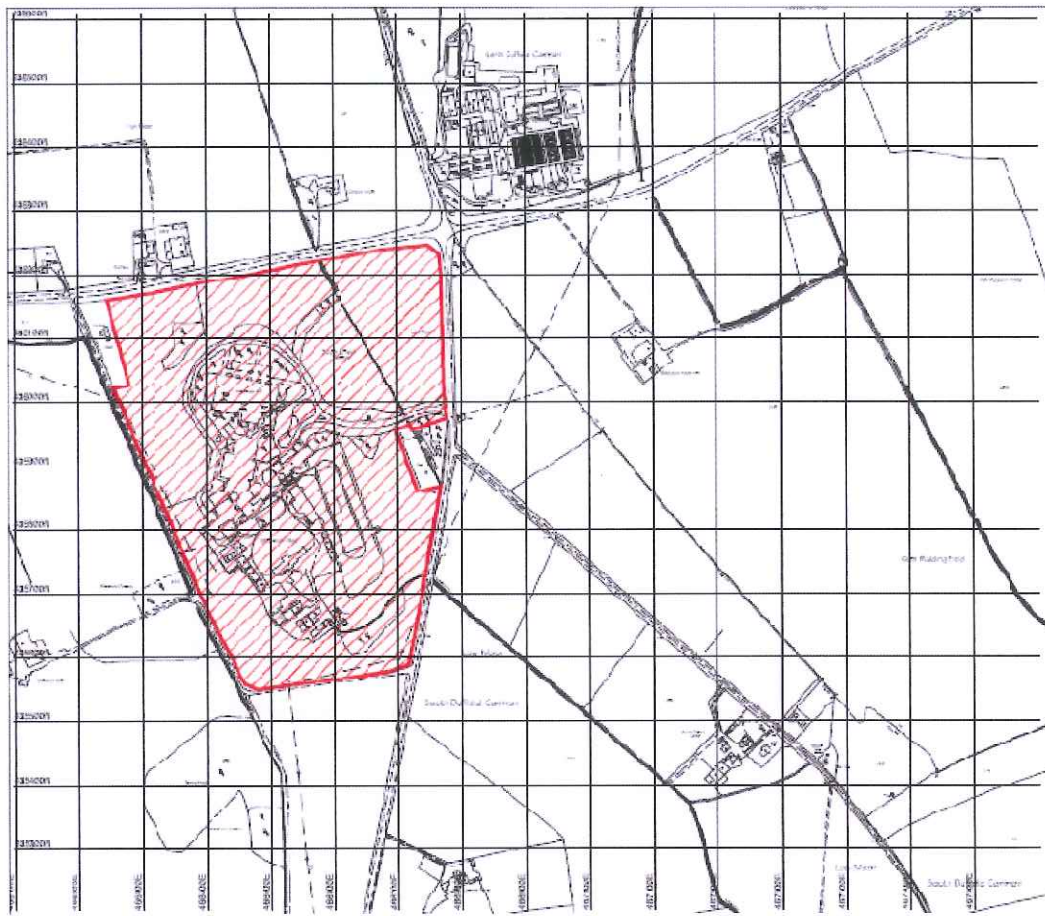
Dated

2/9/2012

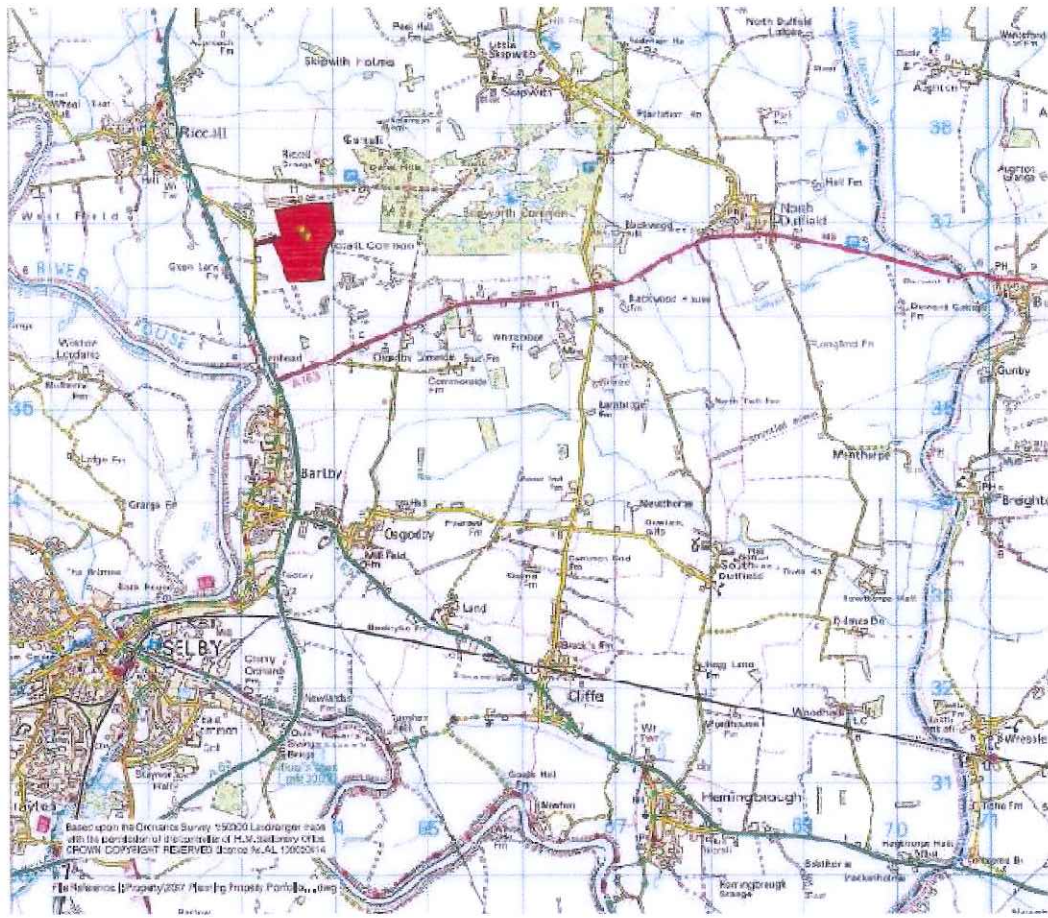
Whitemoor Business Park Location Plan



Whitemoor Business Park Site Plan



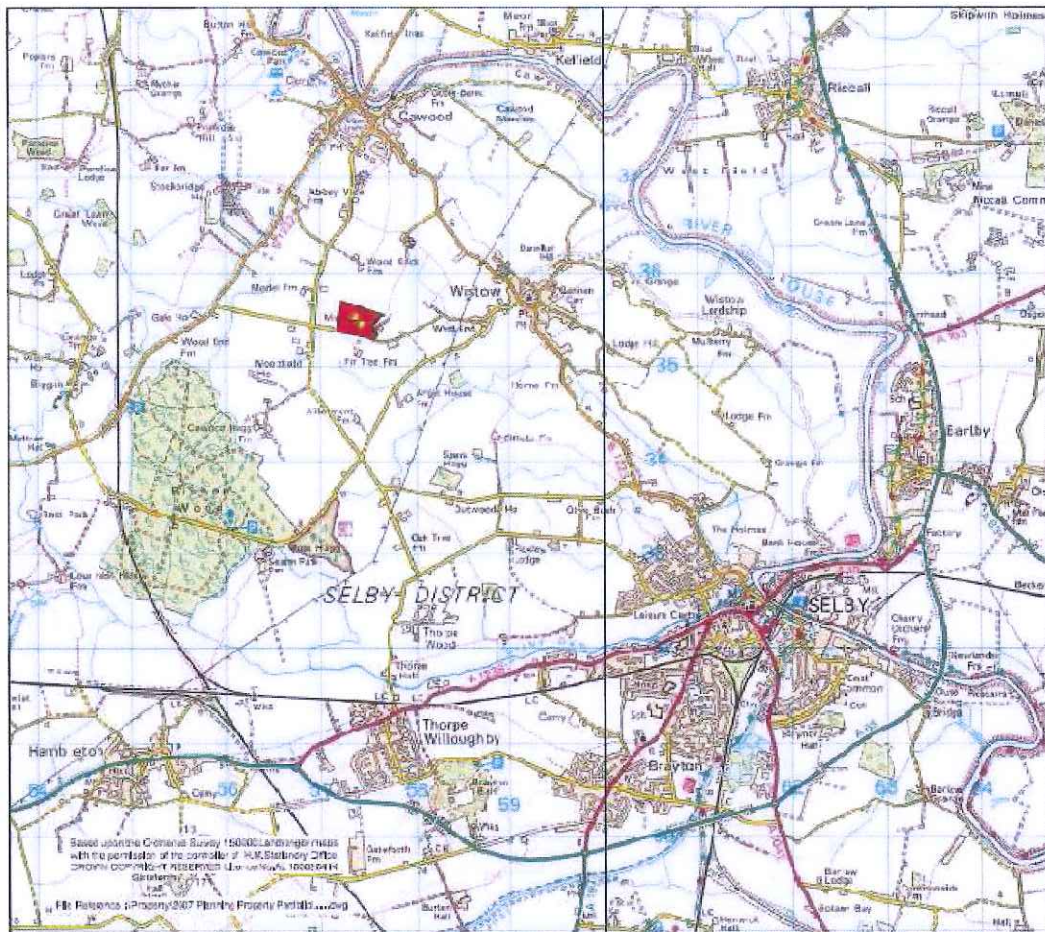
Riccall Business Park Location Plan



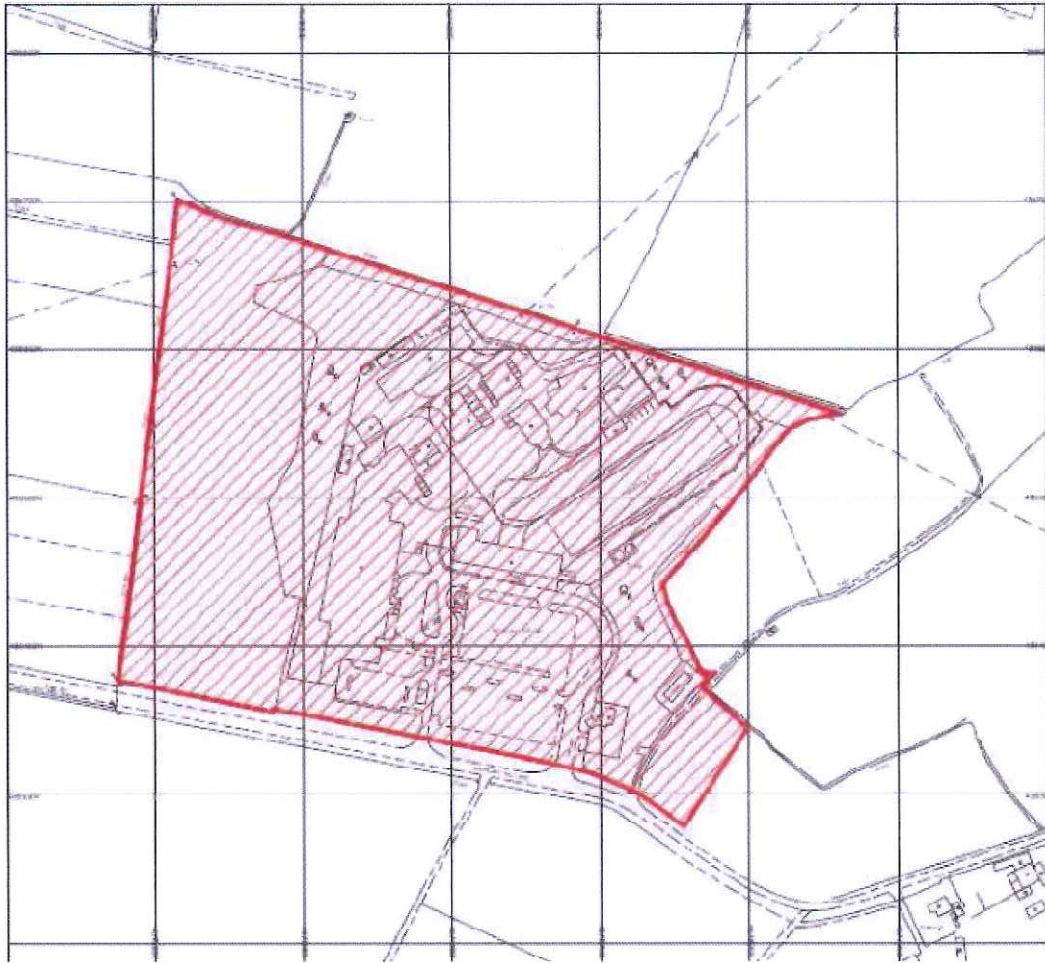
Riccall Business Park Site Plan



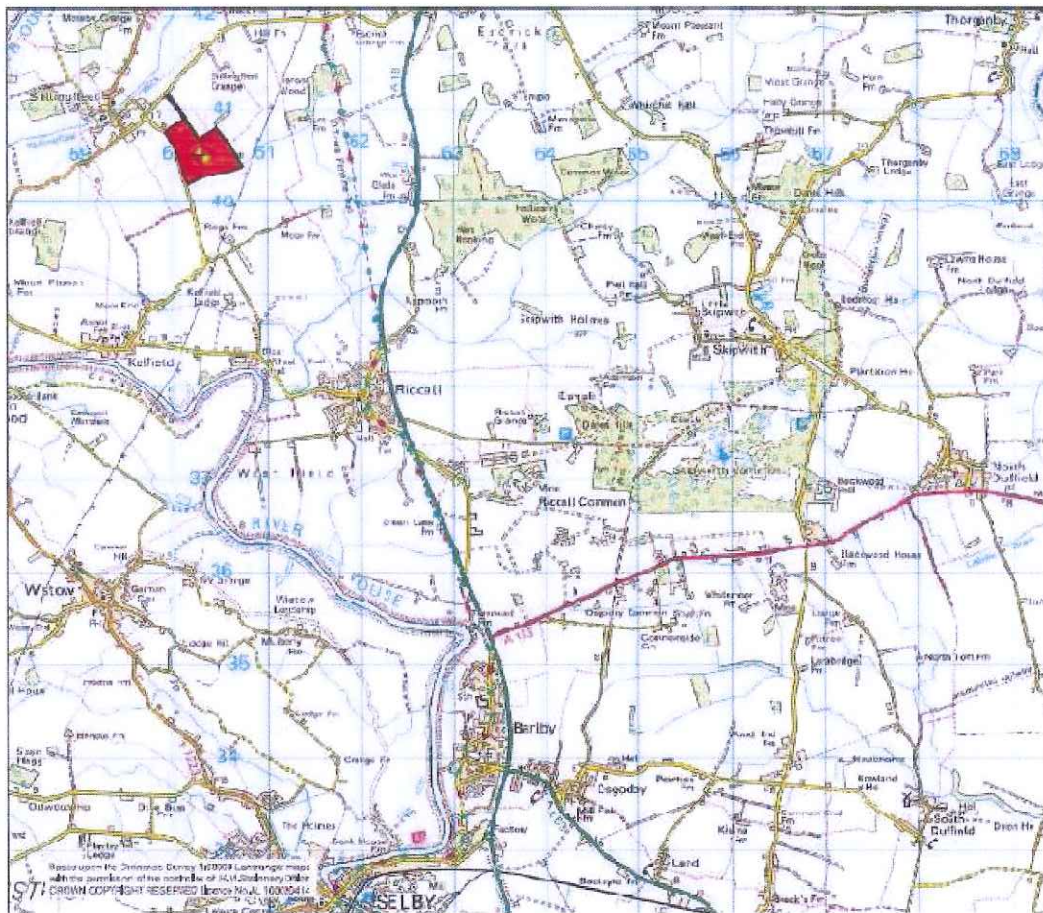
Former Wistow Mine Location Plan



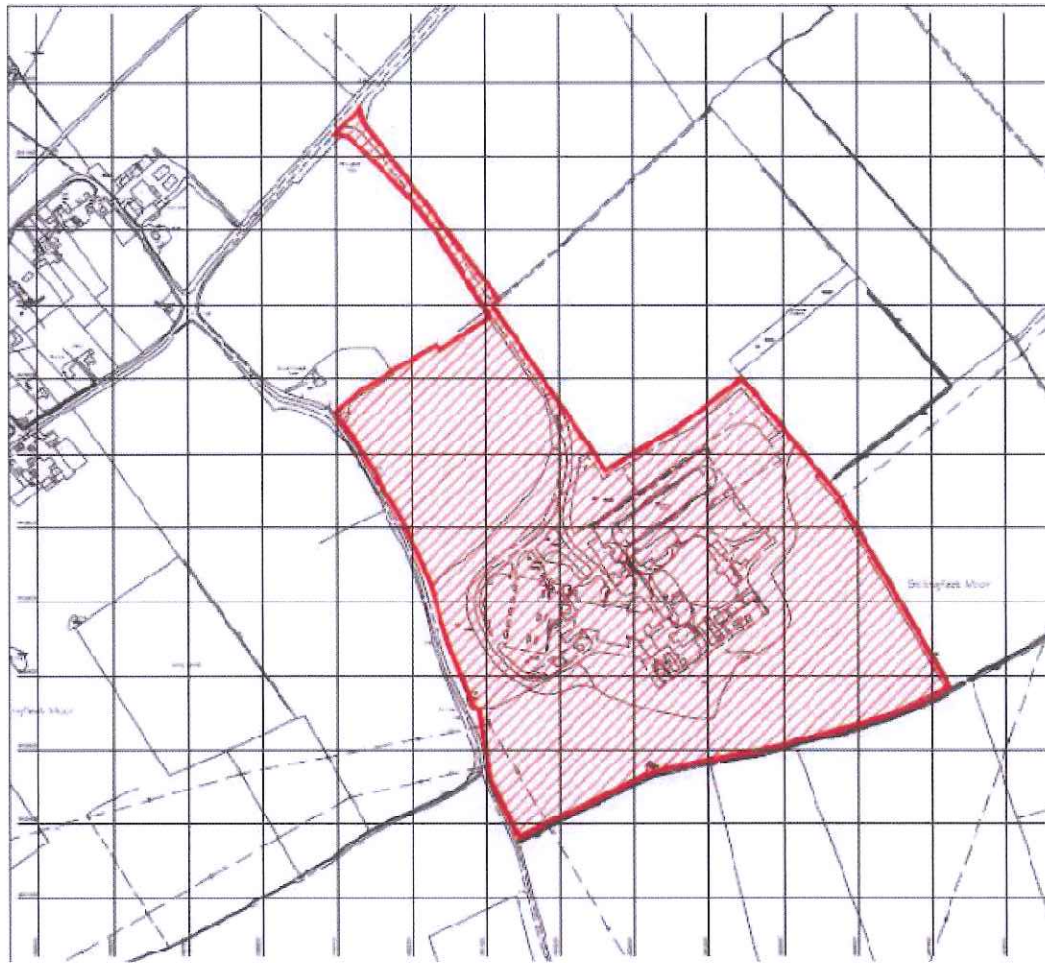
Former Wistow Mine Site Plan



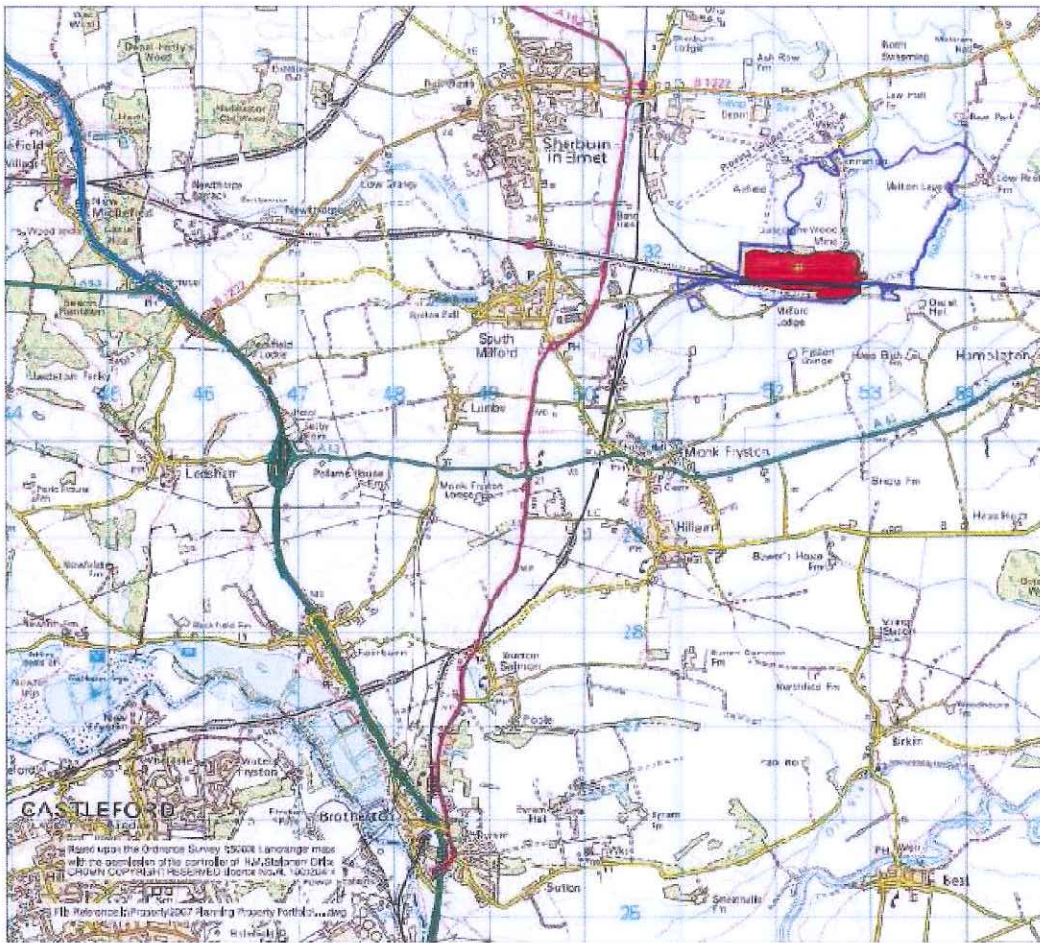
Former Stillingfleet Mine Location Plan



Former Stillingfleet Mine Site Plan



Gascoigne Wood Interchange Location Plan



Gascoigne Wood Interchange Site Plan

