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Sent: 15 February 2012 16:22
To: ldf
Cc: Jeremy Nolan; Mike Dove
Subject: FW:
Attachments: 5th set of further proposed changes 150212.pdf
Please see the attached , kind regards

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IAIN BATH PLANNING

Selby District Submission Draft Core Strategy

**Fifth set of further proposed changes and editorial changes
and minor amendments to the Submission Draft**

Core Strategy

February 2012

Planning Consultancy

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JAIN BATH PLANNING

1.0 Introduction

- 1.1 Following the recent publication of the Fifth set of proposed changes to the Core Strategy comments have been invited through consultation on the content of this document.
- 1.2 This further submission is made on behalf of Glentrool Estates Group who have previously made appropriate representations at all stages of the LDF process and who have land assets in Sherburn in Elmet.

2.0 The Strategic approach to Green Belt Releases

- 2.1 National Government Guidance as contained within PPG 2 Green Belts is clear that green belt boundaries should only be altered in exceptional circumstances.
- 2.2 It is evident from details submitted to the Examination in Public that the settlement of Tadcaster is heavily constrained in land availability terms due to the resistance of local land owners to making non green belt land available for development.
- 2.3 The conclusion that the Council has reached is that green belt land needs to be considered to fulfil Tadcaster's role in the settlement hierarchy and this is reflected within the 5th set of proposed changes document with a new policy CPXX.
- 2.4 This is not considered to be an appropriate approach given planning policy guidance and the fact that the opportunity exists within the core strategy process to consider the wider District Area as a whole and to identify alternative and more sustainable locations to accommodate the growth proposed for Tadcaster.
- 2.5 Tadcaster is clearly a constrained settlement and rather than adopt an approach to identify unsuitable and less sustainable land opportunities consideration should now be given to reassessing the role of Tadcaster and transferring the identified requirement to alternative locations which given its status, should as a focus concentrate on Sherburn in Elmet.

- 3.0 **The scale of housing and employment development proposed for Tadcaster and the implications for the green belt**
- 3.1 From evidence given at the previous examination it is clear that the Council cannot deliver the housing and employment land that is proposed for Tadcaster without releasing land from the green belt.
- 3.2 It is not considered appropriate based upon this context and prevailing planning policy in relation to green belts to simply conclude that because there is insufficient land outside the green belt around Tadcaster to meet the needs identified for the settlement green belt land releases are justified.
- 3.3 Given that the core strategy is a comprehensive District wide assessment process alternative options, such as accommodating the growth in other locations, should be investigated to avoid the necessity for such green belt release.
- 3.4 In particular the level of growth proposed for Tadcaster and specifically the amount of employment land envisaged could be accommodated in Sherburn in Elmet on highly sustainable brown field land avoiding the need for any green belt revision.
- 3.5 As a consequence and given that it is considered that such a redistribution process would not fundamentally change the overall strategy of the core strategy document it is advocated that the growth envisaged for Tadcaster should be redirected to other sustainable locations avoiding any need to review the green belt round Tadcaster.
- 3.6 Given the constrained position that prevails at Tadcaster and which shows no sign of altering over the plan period the opportunity should be taken by the Council now to either downgrade the settlement status of Tadcaster or elevate the settlement status of Sherburn in Elmet above Tadcaster and redistribute the proposed growth accordingly.
- 3.7 The proposed Green belt Review process, and the new policy CPXX proposed within the 5th set of changes are not considered the most appropriate way to address this issue when assessed against prevailing national policy guidance.

4.0 The overall scale of housing development over the plan period

4.1 It is clear from the evidence presented at the Examination in Public that the current level of housing need is significantly above that proposed by the Council. As a consequence it is considered that there is a requirement to reconsider the overall housing target for the District as a whole, and relative to individual settlements, in the light of the most up to date evidence. The revised figures contained within the 5th set of proposed changes document do very little to address this particular issue.

4.2 It is also evident from the work that the Council have carried out in preparing the site allocation DPD that the identified designated service villages in the core strategy within green belt areas have either insufficient capacity to accommodate proposed growth in the plan period and / or in the next plan period.

4.3 As a consequence the most up to date evidence and the most sustainable locations within the District should be reassessed and identified to accommodate the appropriate level of housing growth over the plan period.

This would include settlements such as Sherburn in Elmet and highly sustainable designated service villages such as Church Fenton.

4.4 It is considered that such a redistribution of growth and increased provision to reflect up to date evidence would not run to the heart of the strategy contained in the core strategy.

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- 5.0 **The Plan Period and the overall scale of employment land provision**
- 5.1 It is noted from the 5th set of proposed changes document that the Core Strategy dates are to be revised by reference to 2027 as opposed to 2026.
- 5.2 There should be a corresponding increase in the level of allocated employment land to reflect this longer plan period and it is advocated that this should be at Sherburn in Elmet with an increase in the SHER 15 allocation.
- 5.3 This would reflect the fact that this location is the primary focus in the district for employment growth and Sherburn in Elmet is a location with an increasing population as opposed to Tadcaster whose population has decreased.
- 5.4 The justification for the scale of employment land that should be identified within the district and specifically in Sherburn in Elmet has been covered in earlier submissions made on behalf of my clients but a summary document on these points is attached at Appendix 1.

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Selby Core Strategy Examination

Representor Number: 39

**Further submissions made on behalf of
Glentool Estates Group
To the Inspector's Matters and Issues**

**Glentool Estates Group
CP9 / CP10, / CP11 / Matter 6**

**Land at Bishopdike Road
Sherburn in Elmet**

September 2011

Planning Consultancy

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IAIN BATH PLANNING

1.0 Introduction

- 1.1 This further submission is made on behalf of Glentrool Estates Group who own the 40 hectare site identified on the plan attached to this statement.

This site is in single ownership, is available and is immediately deliverable with all appropriate technical assessments undertaken to confirm this. It is situated adjacent to the existing industrial estate and would provide an entirely logical extension to employment activity in this location.

- 1.2 This submission concentrates specifically on the question of the appropriate quantum of employment land to identify within the plan period within the context of national economic growth objectives, regional aspirations for Selby District and in particular employment needs of Sherburn in Elmet at a more local level.

- 1.3 The submission reflects the key objectives identified for the Selby District economy and Sherburn in Elmet within the core strategy which can be summarised as follows:

- i) The need for additional employment space to meet the needs of the modern economy including diversification into growth areas;
- ii) Support for the focus of employment opportunities for inward investment and indigenous growth within Sherburn in Elmet;
- iii) Strengthening the local economy and reducing economic migration out of the district;
- iv) Strengthening the Districts important connections with the Leeds City Region and York and North Yorkshire economies;
- v) Recognition that Sherburn in Elmet has been the main location for employment development within Selby District since 2004;
- vi) The lack of available sites and a very limited choice of sites, particularly in Sherburn in Elmet, for inward investors.
- vii) The strengths and opportunities of Sherburn in Elmet:
 - Proximity to workforce;
 - Access to trunk roads A1M
 - Attractive location for new development – critical mass, existing concentration of businesses in large purpose built industrial estate of regional / national significance
 - But needs continued confidence by attracting more investment by improving existing industrial estate and providing more land otherwise may stagnate / decline.

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2.0 **Matter 6 – The Economy and Employment**

Matter 6.1 : Is the strategy for providing employment land soundly based, up- to date, fully justified and supported by evidence, and does it reflect national policy and wider economic strategies.

2.1 Planning Policy Statement 4 (Planning for Sustainable Economic Growth) requires Local Planning Authorities to prepare and maintain, a robust evidence base to understand both existing business need and likely changes in the market.

2.2 The contents of this document together with the significant changes that have taken place in the economy over recent years are material to the employment land question as the core strategy document moves forward.

2.3 Within Selby District demand has previously been based on nett employment growth projected through a regional econometric model.

Employment land has been identified based on historic levels of take up and should more appropriately have regard to the Districts strengths within both the regional and national economies. The findings of background assessments undertaken for the Council indicate that employment activity within the District has been higher in terms of levels of growth and enterprise than seen nationally, regionally and sub-regionally.

2.4 PPS 4 suggests that employment growth cannot be based on market demand alone and requires a wider economic context to be taken into consideration. This national guidance also suggests that analysis should be by sub-area where there are distinct property market areas within the District.

2.5 The LPA's Employment Land Refresh (ELR 10) Final Report published in December 2010 concluded that Sherburn in Elmet had a high proportion of economic growth within manufacturing and construction and has been the main location for employment development since 2004.

This context must then be seen in the further conclusion that the amount of available land in Sherburn in Elmet is a very low amount representing a very limited choice for inward investors and indicating the need to identify further opportunities to meet existing needs and into the future plan period.

2.6 Sherburn in Elmet is a strategic location and the benefits of making more land available here would buoy confidence, attract further investment, provide choice and be consistent with the economic growth objectives of national policy and economic strategies for the region.

2.7 The Employment Land Strategy should therefore seek to include more flexibility, identify more land to give choice and availability and enable the opportunity to deliver the aims and key aspects of national advice on economic growth.

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3.0 **Matter 6 : The Economy and Employment**

Matter 6.2 "Does policy CP9 and the accompanying text give sufficient guidance about the scale, location and timing of additional employment land to guide subsequent DPD's? Why is it necessary to have a wide range in the employment land requirement.

3.1 Whilst the core strategy and policy CP9 does identify Sherburn in Elmet as a location for employment growth it fails to acknowledge the background assessment and conclusions regarding the strategic location of Sherburn in Elmet, its performance as the principal employment location in the District and the lack of available land.

Recent market deals including Debenhams and Sainsbury's reflect this.

3.2 Policy CP9 needs to be more flexible and there should be explicit acknowledgement and support for a much increased quantum of employment land within Sherburn in Elmet to provide the appropriate opportunity and encouragement to economic growth.

3.3 The policy should be worded in a way to enable a range and quality of land opportunities to play a role in the new economy of Selby providing a platform for growth consistent with National Policy Objectives and not simply to restrict opportunities based upon a historic context.

3.4 There is no preclusion to setting out a policy context which provides flexibility and an employment land position which allows for all opportunities and economic growth to be fully exploited so enabling all potential requirements to be met.

4.0 **Matter 6 – The Economy and Employment**

Matter 6.3 : "Are the amounts of employment development proposed at Tadcaster and Sherburn in Elmet based on sound and credible evidence, particularly in light of their very different histories and recent patterns of growth".

4.1 The background analysis undertaken relative to employment land within Sherburn in Elmet clearly illustrates a high performing, attractive location which has seen growth in economic terms ahead of any other part of the District over the last seven years.

Balanced against this there is only limited availability of land in Sherburn in Elmet and existing stock is characteristically old and not necessarily suited for modern business.

4.2 The amount of land identified for employment growth at Sherburn in Elmet fails to build on the success story of investment and occupier commitment which has created a critical mass of business activity.

4.3 The level currently proposed does not recognise how a quantum of new employment land can be provided to encourage and entice opportunities consistent with national policy and regional objectives.

4.4 Sherburn in Elmet is a proven location for employment and business activity which will attract more investment and growth as long as flexible opportunities offering quality, range, availability and deliverability for build to suit solutions can be made available.

4.5 There is a clear evidence base that shows little take up and growth in economic terms in Tadcaster with the complete opposite context in Sherburn in Elmet.

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An increased quantum of land should be introduced into the plan for Sherburn in Elmet to further build on its strengths, capitalise on existing infrastructure and extend the employment offer in the interests of attracting further investment and growth.

5.0 **Matter 6 – The Economy and Employment**

Matter 6.4 “How will the aspirational aspects of Policy CP9 such as ‘giving priority to higher value jobs’ and ‘encouraging high value knowledge based activities’ be implemented.

- 5.1 High value jobs will be created by high calibre companies within new economy business serving emerging markets with new products.

This will be assisted by direct links for potential and committed occupiers to Selby College and Access Selby.

- 5.2 The availability of the significant opportunity of this land in Sherburn in Elmet will enable the delivery of a diversity of business accommodating manufacturing, distribution, office and service sectors as well as assisting supply chain sectors.

- 5.3 There would be head office potential with the opportunity for inward investment, consolidation of functions and the availability of single site operations.

- 5.4 The quantum of land taken together with the strategic strengths of Sherburn in Elmet as a location will give the maximum flexibility to the market place and allow all aspects of economic growth to be exploited and delivered to the benefit of the Selby Economy.

- 5.5 Policy CP9 as suggested earlier should be a more flexible policy context enabling the future maximisation of economic objectives.

In relation to Sherburn in Elmet the policy has the ability if flexibly worded to set the scene for the land identified in Glentool’s ownership to be delivered as a strategic “special opportunity area” for economic growth as part of the subsequent allocations DPD exercise.

6.0 **Summary**

- 6.1 Sustained growth of the local economy is a key objective for the District Council. However to reflect the advice of PPS4 and to build on the regional relationships and objectives it is considered that a far more aspirational and flexible employment land context is required to present real opportunities for growth.

- 6.2 Given the proven success of Sherburn in Elmet as the Districts premier employment location and the distinct differences of this sub-area to Selby it is imperative that the core strategy takes this opportunity to put in place a context that will enable continued economic success in Sherburn in Elmet and the further elevation of the Districts economy both regionally and nationally.

- 6.3 On this basis it is respectfully requested that the core strategy be revised to incorporate flexibility to enable such objectives to be delivered through the plan period and a much higher figure of employment land identified for Sherburn in Elmet.