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**SELBY LDF**

**SUBMISSION DRAFT CORE STRATEGY**

**PROPOSED CHANGES No 6**

**REPRESENTATIONS**

**ON BEHALF OF**

**THE GRIMSTON PARK ESTATE**

**REPRESENTOR No.20**

JULY 2012



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## 1.0 INTRODUCTION

- 1.1 Carter Jonas LLP represents the interests of the Grimston Park Estate and welcomes the opportunity to comment upon the Proposed Changes No.6 to the Submission version of the Core Strategy.
- 1.2 Representations have been submitted at each stage of the Core Strategy as well as to each set of Proposed Changes. We have managed to attend most sessions of the Examination. It is not the intention to repeat the comments previously made unless these contribute to the matters raised or remain as issues which remain to be addressed
- 1.3 As previously, these comments are principally submitted in relation to Estate land at Kelcbar Hill/Wetherby Road, Tadcaster, as well as land at Ulleskelf and Towton.

### PREAMBLE

- 1.4 In broad terms our position throughout the process is unchanged and supportive of the broad principles which underpin the Core Strategy. Representations have sought to bring certainty and clarity to the document.
- 1.5 At the heart of our comments is the support for the designation of Tadcaster as a Local Service Centre, which should serve the needs of its residents and hinterland and accommodate an appropriate level of housing and employment growth; Ulleskelf as a Designated Service Village, and Towton as a Secondary Settlement capable of accommodating housing development.
- 1.6 Grimston Park Estate has put forward development sites in each of the settlements identified and can confirm its willingness to bring those sites forward during the Core Strategy period. Meetings have been held with representatives of the communities of Tadcaster and Ulleskelf to explain the proposals and the Estate's continuing commitment to the prosperity and wellbeing of the communities.
- 1.7 It is welcomed that the Council has published a comprehensive document which sets out the cumulative effects of all of the changes to date and identified those which comprise main modifications and those which are consequential minor /additional modifications.

## COMMENTARY

- 1.8 Set out in the following sections is our response to the Council's current consultation exercise. In doing so we refer to the Schedule of all Proposed Changes document as it sets out the most comprehensive list of changes (PC1-6) as well as the evidence base which supports it.
- 1.9 In submitting representations we note the inclusion of the appropriate tests from the NPPF. Para 48 sets out that when a local planning document is examined by an independent inspector, that assessment will consider whether the document has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements and whether it is sound. Such a plan is considered "sound" where it is
- **Positively prepared** – seeking to meet objectively assessed development and infrastructure requirements;
  - **Justified** – the most appropriate strategy when considered against reasonable alternatives
  - **Effective** - deliverable; and
  - **Consistent** with national policy; particularly the NPPF.

## 2.0 GENERAL CONSIDERATIONS

- 2.1 As a starting point we congratulate the Council for maintaining the ambitious programme to address the matters raised by the Inspector and various representatives following the suspension of the Core Strategy Examination sessions in late September 2011 and then the further matters arising at the time of the April 2012 sessions notably the provisions of the Localism Act coming into force and the publication of the National Planning Policy Framework (NPPF) with immediate effect.
- 2.2 A consequence of the various sessions and the changes over the Examination period is a Core Document list which exceeds 100 documents. What is welcomed as part of this current consultation is the preparation of a composite Core Strategy document which incorporates the cumulative changes and their consequences; this is helpful as it facilitates consideration of the Submission version.
- 2.3 Giving some consideration to this composite document demonstrates the scope and extent of the proposed changes (whether as main modifications or the additional modifications which follow). Some 100 separate changes to the Submission Core Strategy are included within the current round (PC No.6) of consultation. We are of the view that the various changes do not fundamentally change the Core Strategy as submitted, particularly the spatial strategy which underpins it, but provide clarification and certainty. We would suggest that this is made a point of discussion at the reopened Examination in September to ensure that there is agreement to this position.
- 2.4 Where we do have concerns is in the detail of the policies and previous comments particularly on the Core Strategy period, housing numbers and the distribution, (particularly to Tadcaster) remain to be addressed.
- 2.5 Notwithstanding the composite document a number of inconsistencies remain, although these do not undermine the principal elements of the Core Strategy. No doubt these will be picked up (as additional changes) through a comprehensive edit of the final document.

### 3.0 THE CURRENT CONSULTATION

#### Localism Act

- 3.1 It is noted that Proposed Changes 6.1 to 6.10 refer to consequential amendments of the references to the Localism Act and the associated terminology including the reference to Local Plans.

#### Neighbourhood Plans

- 3.2 With regards to Neighbourhood Plans, PC 6.9 inserts some explanatory text. It is welcomed that the Council will take a positive and collaborative approach on such matters. In doing so it would be appropriate to explain how neighbourhood planning documents sit alongside the Core Strategy in that they will be part of the statutory framework including how they relate to the Site Allocations process. Moreover it would be appropriate to explain how they can enable **more** development than is allowed in the Core Strategy. This is a slightly different emphasis than explained in the additional paras 1.5a-c. We would suggest that the Changes should more accurately reflect the NPPF.

#### Duty to Cooperate

- 3.3 Within Chapter 2, a number of changes are proposed as a result of PC 6.11 which explains the Council's response to the "Duty to Co-operate". In our view, the Council has explained its response, but fails to demonstrate that it has satisfied the DTC. Within paragraph H reference is made to the LCR Interim Spatial Strategy and the NY & Y Sub Regional Strategy, which has not been approved. Neither document (the ISS or the SRS) has been through a process of public scrutiny or examination.
- 3.4 With regard to paragraph L we would disagree with the comments relating to cross boundary issues so far as housing is concerned, for the reasons previously raised. The housing numbers put forward by the Council do not reflect best practice, nor do they adequately take into account matters such as migration and commuting; failing to recognise the relationship that Selby has with the neighbouring cities of York and Leeds.
- 3.5 Para 6.12 seeks to recognise Escrick as a DSV, which we consider to be an appropriate status for the village.

- 3.6 A number of minor changes to the Core Strategy objectives are covered by PC6.11 - 17, referring to land of **lesser** environmental value, promoting good quality design to aid social interaction and recognising the economic benefit of the best agricultural land.
- 3.7 PC6.18 introduces the model policy setting out the Presumption in Favour of Sustainable Development; the change is supported.

### **Policy CPXX**

- 3.8 PC 6.21-25 relate to the locational principles, whereas PC 6.19-20 relate to the new policy CPXX; they include the removal of references to Major Developed Sites along with changes to the written justification. It would appear that the Green Belt Review will take a broad approach to reviewing boundaries, as well for the removal of land from the Green Belt for development during the Core Strategy period and the identification of land for “safeguarding” beyond the current plan period is both prudent and pragmatic, particularly for the reasons identified at Tadcaster.
- 3.9 Grimston Park Estate considers the approach for the release of Green Belt land in sustainable locations (for example, to the north of the town centre) is complementary to proposals to regenerate the town centre.
- 3.10 What is not clear from the proposed redrafting is the stipulation that the Green Belt Review and Sustainability Appraisal will then undergo public consultation (PC para 4.39o et al and CPXX Provision F). It is not clear whether this is part of the Site Allocations DPD process or will run in isolation/parallel. Some clarification is required to **PC6.20** to ensure that any public consultation on the Green Belt review, the methodology and emerging results is robust, justified and coherent.

### **Policy CP1**

- 3.11 Following on from the comments above, it is necessary to tie together the allocation of land (CP1B) for development with any consultation upon the review of the Green Belt.
- 3.12 PC6.26-31 are supported as a clarification to the policy. Removal of the brownfield target is welcomed; retaining a brownfield preference and indicator would seem appropriate on this basis.



### Policy CP1A

- 3.13 Changes to the justification to Policy CP1A (PC6.33 and 34) suggest a relaxation of the Council's policy on the release of greenfield land for housing. These are supported.

### Policy CP2 Scale and Distribution of Housing

- 3.14 Previous comments upon the scale and distribution of housing, particularly for Tadcaster, remain to be resolved.
- 3.15 Running through the changes, PC 6.40 removes the proposed phasing of delivery (Para 5.4) and is supported. PC 6.35 seeks to justify/clarify the identification of the distribution of housing (to Tadcaster); whilst it is welcomed it is not supported. It does not address the fundamental point made on previous occasions that housing need is just one indicator at a certain point in time and should not be used as the sole reason for designating the distribution of housing. We consider that Tadcaster should accommodate a minimum of 9% of the District housing requirement, commensurate with its role as a Local Service Centre.
- 3.16 This is addressed in part through PC6.37 which suggests that the housing numbers are a minimum; this approach is supported. In our view, however a consequence of this is that the housing numbers should be rounded upwards, and not so prescriptive.
- 3.17 In considering the consequences of PC6.37 changes to the text of CP2 should be made. We would suggest that Provision A be reworded as follows:

*"Provision will be made for the delivery of a minimum of 450 dwellings per annum and associated infrastructure in the period to (March 2028)."*

- 3.18 Consequential changes to Provision B should include the insertion of the words "at least" after "a target of". Consistent with our previous comments, amendments to the subsequent table in Provision B should include for Tadcaster 9%, with a minimum requirement of 650. We would advocate that the (dpa) in column 4 is indicative and should be 45.
- 3.19 In relation to the minimum requirement in Tadcaster, current planning permissions suggest 140 units have consent (which we understand includes Mill Lane) leaving a

minimum indicative suggested allocation of 510. However, given the failure of scheme delivery in Tadcaster over a number of years, we would suggest that the New Allocations needed should be of 650 as this will provide certainty for any review of Green Belt around the town as well as the release of other green field sites.

- 3.20 It is not appropriate to exclude Secondary Villages from the new allocations process. Sites should be allocated to ensure delivery of open market housing in rural areas, as well as local needs housing, so that rural areas remain vibrant and viable, consistent with NPPF. Comments are submitted on policies CP5 and CP6 in this regard.

### **Policy CP3 Managing Housing Land Supply**

- 3.21 PC6.44 – 52 relate to delivery of housing during the Core Strategy period; it is welcomed that the Council recognise the desire in the NPPF to secure higher levels of housing delivery.
- 3.22 It would be appropriate for the subtitle (**PC6.47**) at para 5.53 to have the word “target” removed as this is not consistent with the subsequent justification.
- 3.23 One of the matters raised at the April Examination sessions was the absence of an alternative strategy for Tadcaster; in essence the production of a “Plan B”. Carter Jonas raised concerns with Officers about wording of their 29 May 2012 Committee Report which suggests that there are land supply issues around Tadcaster. We would refute those statements and confirm that the Grimston Park Estate (GPE) is a willing landowner which is actively promoting land to the immediate north of the Town Centre and is in advanced discussion with a developer.
- 3.24 During the April Examination sessions, proposals were mooted for a comprehensive regeneration scheme by a landowner in the town centre including renewable energy generation, the extent of new employment floorspace provision was not clear, with submission of proposals described as imminent. Whilst details of that town centre scheme have not emerged in the timescale suggested by the agent it is considered that proposals on the GPE site are complementary to a town centre regeneration given the proximity of the land and ability to provide safe pedestrian linkage.

- 3.25 Should problems arise in the delivery of the town centre scheme the proposals put forward by GPE at Kelcbar to the north of the town centre could be brought forward without hindrance to deliver the housing numbers set out in Policy CP2 as amended. Previous representations suggest that this is the only option available to Tadcaster, given the statement (by others) that no other sites around Tadcaster are available or likely to come forward during the Core Strategy period, either as currently allocated or those suggested as Preferred Options during the Site Allocation DPD consultation of September 2011.
  
- 3.26 **PC6.51** suggests through paras 5.55a-e, the identification/allocation of additional sites around Tadcaster to ensure that there is "maximum flexibility" in order to deliver the Core Strategy objectives. This suggests a "multi-layered" approach; including the identification of different sites for housing should sites fail to come forward, alongside a number of options for the Council to review its own landholdings and other mechanisms to deliver growth. The default is then to consider dispersing growth elsewhere around the District in accordance with the settlement hierarchy. This latter would clearly indicate a failure of the Core Strategy principles.
  
- 3.27 A number of changes are proposed to the wording of Policy CP3 to reflect the concerns raised. Unfortunately the policy appears somewhat complex. We would suggest that provision CC should be amended to state:

*"In Tadcaster, the Site Allocations DPD will allocate land to accommodate the minimum quantum of development identified in Policy CP2. This will include Green Belt releases of land at Kelcbar Hill to the north of the town centre in accordance with Policy CPXX."*

- 3.28 Grimston Park Estate has identified its willingness to collaborate with the District Council and the community to bring forward land at Kelcbar as a sustainable extension to Tadcaster. That position remains.

**Policies CP5 and CP6 Housing**

- 3.29 PC6.52-58 detail changes to the affordable housing and rural exceptions policy. Whilst these broadly reflect the NPPF, we would still suggest that housing sites in rural settlements should be identified to include a mix of open market and local needs housing to minimise the need for grant funding and facilitate more innovative forms of housing

provision in rural areas.

- 3.30 This should be reflected in changes to the housing requirement in CP2 for secondary villages.

### **Policy CP8 Access to Facilities and Infrastructure**

- 3.31 We have no comments upon the proposed changes at this stage.

### **Promoting Economic Prosperity**

- 3.32 A number of changes are proposed to the economic growth section of the Core Strategy with the amalgamation of several polices into CP9 through PC 6.65-76.
- 3.33 Broadly the changes seek to be less prescriptive particularly for Tadcaster, and support further development in the north of the District including through rural diversification. Recognition that Tadcaster can differentiate itself through encouraging high value and knowledge based activities (finance, professional services and insurance), alongside the traditional industries within the town would appear to be consistent with sustainable development principles. Encouraging the provision of town centre sites and premises to provide additional employment floorspace should be a central part of the policy CP9 A5.

### **Protecting and Enhancing the Environment /Design Quality**

- 3.34 PC6.88-99 suggest changes to policy to reflect the NPPF. Removal of minimum density requirements and the consideration of design quality as a key component of place making are consistent with our comments to the Core Strategy.

## 4.0 SUMMARY AND CONCLUSIONS

- 4.1 Carter Jonas LLP welcomes the opportunity to submit representations to the Sixth set of Proposed Changes to the Core Strategy. These comments should be considered alongside those prepared to previous rounds.
- 4.2 Many of the changes are introduced to enable consistency and reflect changes to the planning system arising from the provisions of the Localism Act and publication of the National Planning Policy Framework. Broadly these are supported.
- 4.3 In commenting upon the cumulative Proposed Changes we would suggest that these do not result in a substantive change to the Core Strategy as submitted. Some discussion at the reconvened September Session would seem appropriate to confirm agreement on this position.
- 4.4 Changes to the Policy CPXX are consistent with the NPPF and comments raised at previous stages. It is welcomed that the Green Belt Review will consider addressing anomalies as well as identifying areas where land can be released and allocated for development for homes and jobs through the Core Strategy period, and identified for safeguarding beyond the plan period.
- 4.5 Broader concerns remain over the scale of housing, distribution and the number of dwellings to be accommodated in sustainable locations around Tadcaster. A number of the changes do introduce a degree of flexibility with the consideration of a minimum number and the requirement of CP2 rounded up. That said we have suggested a change to the requirement for Tadcaster to give certainty to the proposed Green Belt Review and the extent of land releases, including for safeguarding.
- 4.6 With regard to CP3 it is acknowledged that the land availability situation in Tadcaster has been complicated by the indication that none of the Council's Preferred Options (Draft SADPD September 2011) are available. A town centre regeneration scheme was introduced to the April Examination sessions but has yet to materialise; such a mixed use scheme could deliver some of the housing and employment floorspace required in the town over the Core Strategy period.

- 4.7 Land to the immediate north of the Town Centre has been put forward by Grimston Park Estate, a willing landowner, as complementary to the town centre proposals. Suggested changes to CP3 have been proposed to facilitate this.
  
- 4.8 With regard to the remaining proposed changes we would suggest that these are broadly consistent with the NPPF.



APPENDIX 1

CONSULTATION RESPONSE FORM

**Selby District Submission Draft Core Strategy  
Consultation on Further Proposed Changes (6th Set)  
June 2012  
Representation Form**

An Examination in Public (EIP) into the soundness of the Submission Draft Core Strategy (SDCS) was held between 20 and 30 September 2011 and between 18 and 19 April 2012 in front of an Independent Inspector.

The Independent Inspector has adjourned the EIP until 5 September 2012 in order to consider the implications of the National Planning Policy Framework (NPPF) on the Submission Draft Core Strategy and for the Council to consult on any further Proposed Changes to the Submission Draft Core Strategy.

Selby District Council is now publishing and inviting comments on a 6th Set of Proposed Changes to the Submission Draft Core Strategy (and associated documents) in order that all parties can make their views known.

The September and April EIP's have already heard the duly made representations on the Submission Draft Core Strategy which were submitted during the formal Publication stage and subsequent consultation on the first 5 Sets of Proposed Changes. The adjournment should not be used as an opportunity to revisit matters which have been fully considered during the September 2011 and April 2012 hearing sessions.

**Representations are therefore invited as part of this consultation on the 6th Set of Proposed Changes to the Submission Draft Core Strategy and associated documents.**

Please complete separate copies of Part B of this form for each of your separate representations. 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 Thursday 19 July 2012**

**Email to: [ldf@selby.gov.uk](mailto:ldf@selby.gov.uk)**

**Fax to: 01757 292229**

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



## Part A

### The Tests of Soundness

The Independent Inspector's role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. The tests to consider whether the plan is 'sound' are explained under paragraph 182 of the National Planning Policy Framework (NPPF) (March 2012) and states a sound Core Strategy should be:

#### **Positively prepared**

- the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

#### **Justified**

- the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

#### **Effective**

- the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

#### **Consistent with national policy**

- the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

### **Contact Details** (only complete once)

Please provide contact details and agent details, if appointed.

	Personal Details	Agents Details (if applicable)
Name		Paul Leeming
Organisation	Grimston Park Estate	Carter Jonas LLP
Address		Regent House 13-15 Albert Street Harrogate HG1 1JX
Telephone No.		01423 523423
Email address		paul.leeming@carterjonas.co.uk

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

**You only need to complete this page once. If you wish to make more than one representation, attach additional copies of Part B (pages 3-4) to this part of the representation form.**

**Part B (please use a separate sheet (pages 3-4) for each representation)**

**Please identify the Proposed Change (which can be found on the Published Schedule, CD2f) to which this representation refers or paragraph number of the NPPF Compliance Statement:**

PC 6.9 Neighbourhood Planning

**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:**

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

**Question 3: Please give details of why you consider the Proposed Change is not legally compliant or is unsound and provide details of what change(s) you consider necessary to make the Proposed Change to the Submission Draft Core Strategy legally compliant or sound.**

Clarification of the reference to the status of neighbourhood plans as part of the Local Plan. See representations para 3.2.

Continue overleaf

Question 3 continued

[Empty box for question 3 continuation]

(Continue on a separate sheet if submitting a hard copy)

**Question 4: 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?**

- 4.1** Written Representations
- 4.2** Attend Examination

**4.3** 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).

Grimston Park Estate is a major landowner in the northern part of the District. This is one of a number of associated matters which are central to the acceptability of the Core Strategy as part of the Selby Local Plan. It is important that the Estate has the opportunity to discuss these matters through the Examination process.

(Continue on a separate sheet if submitting a hard copy)

**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 (including on the Council's website) 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 [Redacted Signature]

Dated 12 July 2012

**Part B (please use a separate sheet (pages 3-4) for each representation)**

**Please identify the Proposed Change (which can be found on the Published Schedule, CD2f) to which this representation refers or paragraph number of the NPPF Compliance Statement:**

PC 6.11 Duty to Co-operate

**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:**

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

**Question 3: Please give details of why you consider the Proposed Change is not legally compliant or is unsound and provide details of what change(s) you consider necessary to make the Proposed Change to the Submission Draft Core Strategy legally compliant or sound.**

Clarification is necessary of whether the Council has satisfied the requirements of the DTC. See representations para 3.3 and 3.4.

Continue overleaf

Question 3 continued

[Empty response box for Question 3]

(Continue on a separate sheet if submitting a hard copy)

**Question 4: 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?**

- 4.1 Written Representations
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I agree with this statement and wish to submit the above representation for consideration.

Signed [Redacted Signature]

Dated 19 July 2012

**Part B (please use a separate sheet (pages 3-4) for each representation)**

**Please identify the Proposed Change (which can be found on the Published Schedule, CD2f) to which this representation refers or paragraph number of the NPPF Compliance Statement:**

PC 6.20 Policy CPXX Provision F

**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:**

- 2.1 Positively Prepared (Please identify just one test for this representation,
- 2.2 Justified
- 2.3 Effective
- 2.4 Consistent with national policy

**Question 3: Please give details of why you consider the Proposed Change is not legally compliant or is unsound and provide details of what change(s) you consider necessary to make the Proposed Change to the Submission Draft Core Strategy legally compliant or sound.**

Clarification is necessary about the proposed public consultation on a Green Belt Review and progress with the SADPD. See representations para 3.8 to 3.10.

Continue overleaf

Question 3 continued

[Empty box for question 3 response]

(Continue on a separate sheet if submitting a hard copy)

**Question 4: 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?**

- 4.1 Written Representations
- 4.2 Attend Examination

**4.3** 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).*

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(Continue on a separate sheet if submitting a hard copy)

**Representation Submission Acknowledgement**

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

Signed  Dated 19 July 2012

**Part B** (please use a separate sheet (pages 3-4) for each representation)

Please identify the Proposed Change (which can be found on the Published Schedule, CD2f) to which this representation refers or paragraph number of the NPPF Compliance Statement:

PC 6.35-6.44 Policy CP2

**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:**

- 2.1 Positively Prepared (Please identify just one test for this representation,
- 2.2 Justified
- 2.3 Effective
- 2.4 Consistent with national policy

**Question 3: Please give details of why you consider the Proposed Change is not legally compliant or is unsound and provide details of what change(s) you consider necessary to make the Proposed Change to the Submission Draft Core Strategy legally compliant or sound.**

A number of changes to the policy are required to maintain consistency with other amendments proposed. See representations para 3.14 to 3.20.

Continue overleaf



Question 3 continued

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(Continue on a separate sheet if submitting a hard copy)

**Question 4: 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?**

- 4.1** Written Representations
- 4.2** Attend Examination

**4.3** 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).*

Grimston Park Estate is a major landowner in the northern part of the District. This is one of a number of associated matters which are central to the acceptability of the Core Strategy as part of the Selby Local Plan. It is important that the Estate has the opportunity to discuss these matters through the Examination process.

[Empty space for response to 4.3]

(Continue on a separate sheet if submitting a hard copy)

**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 (including on the Council's website) 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 [Redacted Signature]

Dated 19 July 2012

10/10/2017

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