



Allerthorpe Neighbourhood Plan 2019-2034 Submission for Examination
ConsultationSimon Craig to: 'forward.planning@eastriding.gov.uk' 22/02/2019 16:10
From: "Simon Craig" <simon.craig@savills.com>
To: "'forward.planning@eastriding.gov.uk'" <forward.planning@eastriding.gov.uk>

2 Attachments



Reps - Allerthorpe NP - Submission Draft_JL3 (2).pdf Map 7 Land south west of York Road, Allerthorpe.pdf

Dear Sirs,


Please find attached our response to the Allerthorpe Neighbourhood Plan 2019-2034 Submission for Examination Consultation, on behalf of York Diocesan Board of Finance, along with the site location plan referred to in it.

Yours faithfully,

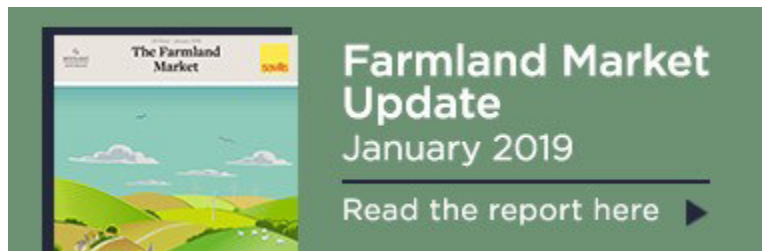
Simon Craig

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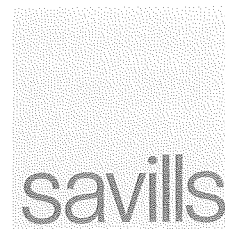
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22 February 2019

Our Ref: SC/PL.51

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Dear Sirs,

**Allerthorpe Neighbourhood Plan 2019-2034 (ANP) - Submission for Examination Consultation
York Diocesan Board of Finance - Land South-West of York Road, Allerthorpe, East Yorkshire**

Introduction

We act on behalf of our client, York Diocesan Board of Finance, who have asked Savills to respond to the above Consultation on their behalf. Our client is a landowner within the boundary of the Neighbourhood Plan Area.

For information, the land which is owned by our client was submitted to the East Riding Local Plan Review Options Consultation Call for Sites consultation in December 2018 (under reference ALER/1051).

As part of the Call for Sites consultation, our client is promoting the above site, which is of one hectare in size, and currently agricultural land for future employment land on the basis of its location immediately across the A1079 York Road from Pocklington Industrial Estate with direct access to that road.

We should therefore like to take this opportunity to make the following comments on, and respectfully request the following amendments to, the ANP.

Response

We support Allerthorpe Parish Council in progressing the ANP, as it is in line with the Revised National Planning Policy Framework 2019. However, before the ANP can be adopted, we propose the following comments/amendments.

Vision and Context

We are supportive, in principle, of the Vision for the ANP, however, propose some minor changes, as per those set out below:

In 2034 Allerthorpe will remain a village with a thriving community, supporting employment growth that is commensurate to the size of the Parish, whilst retaining its rural character and the parish's recreational access to the natural environment.

We welcome the recognition that *'the Plan should allow some sensitively sited development, including residential, agricultural and industrial, that are appropriate in scale and design to the topography of the Parish and the size of the village'*.

However, we consider, in line with the proposed changes to the Vision above, that Paragraph 4.1.2 should be amended, so that the Plan covers employment as well as other development, which is appropriate to the requirements of the local area as well as the topography of the Parish and the size of the village, for the reasons set out below.

It is considered that Paragraph 4.1.2 should read that '*the Plan should allow some sensitively sited development, including residential, agricultural, employment and industrial, that are appropriate in scale and design to the topography of the Parish, the size of the village and the requirements of the local area*'.

Context

Moreover, we note that the contents and policies of the ANP must comply with the Revised National Planning Policy Framework, however, this should be amended to make sure the policies are set within the context of the newly revised NPPF which was published on 19 February 2019 (paragraph 4.2.1). The NPPF states that planning policies should support a prosperous rural economy.

Furthermore, we emphasise that Neighbourhood Plan should be aligned with the strategic needs and priorities of the wider area and should be in general conformity with the strategic policies of the Local Plan and plan positively to support them. They should not promote less development than set out in the Local Plan and should not undermine its strategic policies.

We strongly agree with page 12 of the ANP that, to promote a strong rural economy, local and neighbourhood plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings. This is considered to be in line with the East Riding of Yorkshire Council Local Plan Strategy Document (2016) Policy S4 A and C6 (which states that employment development will be supported in the countryside in accordance with Policy EC1) and Policy EC1 (which states, amongst other things, that employment development will be supported in general where it contributes to the modernisation, development and diversification of the local economy (A1) and in the countryside where it is within or adjacent to an existing industrial estate or business park (D1)). However, this needs emphasizing further in the actual ANP policies. Please see our comment below for reference.

Allerthorpe Village

We are supportive of the desire expressed in the ANP, as set out below, to embrace sustainable economic development within the parish:

It should be noted that Allerthorpe is a rural parish which requires sustaining and supporting through planning policies that support economic growth in order to create jobs and prosperity by taking a positive approach to sustainable new development.

Again, we agree that '*any development, residential or commercial, should be sensitively sited and not compromise the historic fabric nor the natural environment of the Parish*'.

Policy ANP05 - Economy

Our client's interest is to the north east of the plan area (see site location plan enclosed for reference).

As set out at paragraph 5.2.9, Allerthorpe is a rural parish which requires sustaining and supporting through planning policies that support economic growth in order to create jobs and prosperity by taking a positive approach to sustainable new development. We support this approach.

We welcome Policy ANP05 as, within (and in close proximity to) the parish boundary are significant industrial areas, a business park and the second a grain storage and distribution complex. As such, there is a need to consider economy as part of the ANP.

However, we consider that Paragraphs 5.4.2 and 5.4.4 should be amended, so that the Policy covers Pocklington Industrial Estate too. Whilst Pocklington Industrial Estate lies outside the ANP boundary, it is located immediately adjacent to it. The reasons for the proposed amendments are set out below.

It is considered that Paragraph 5.4.2 should read that '*Within and immediately adjacent to the parish boundary are also three significant employment and industrial areas; a business park, a grain storage and distribution complex, and Pocklington Industrial Estate. All three areas are accessed from the A1079*'. Additionally, a third bullet point should be included at paragraph 5.4.2:

- *Pocklington Industrial Estate has two terraces of 11 units in a variety of different sizes with parking spaces outside each unit and an overflow car park. Units can be combined to create more space.*

Whilst it is acknowledged at paragraph 5.4.3 that from the consultation 66% of respondents indicated that they did not believe the parish needed to provide more business opportunities, it is vital to reiterate that the ANP needs to conform with the NPPF (2019) and the Local Plan Strategy Document (2016) which support the rural economy in Paragraphs 83 and 84 and Policy EC1 respectively. We therefore welcome paragraph 5.4.4 which states that the ANP supports increased employment in the Parish.

We note that the ANP will support further development of the existing Allerthorpe Business Park, but not new industrial sites that do not have direct access to the A1079, however, further consideration should be given to the expansion of the Pocklington Industrial Estate at an appropriate scale where access can be obtained from the A1079. It is therefore considered that Paragraph 5.4.4 should read that '*The Plan will support further development of the existing Allerthorpe Business Park and Pocklington Industrial Estate but not new industrial sites that do not have direct access to the A1079*'.

In conclusion, we support Policy ANP05, however, to be found sound, the supporting policy / justification text at paragraphs 5.4.2 – 5.4.4 should be amended as proposed above.

Neighbourhood Plan Design Guidance

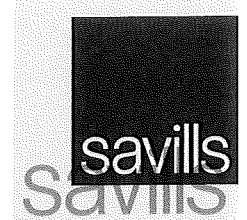
Policy ANP11 - Commercial Development Guidance

We welcome Policy ANP11, but consider that Paragraph 6.2.1 should be amended slightly, so that the Policy covers Pocklington Industrial Estate,. It is considered that Paragraph 6.2.1 should read as follows:

6.2.1 ~~Small Scale Commercial~~ development will be supported where the following can be demonstrated:

- a) The development is within or adjacent to existing commercial or industrial developments within or adjacent to the Parish.*
- b) The development is in keeping with the scale of businesses within Pocklington Industrial Estate.*
- c) The proposed use will not give rise to detrimental impact on local residential amenities as a result of either intended or unintended consequences.*
- d) The proposal will not generate significant amounts of traffic and a need for parking that cannot be adequately catered for, either by the existing infrastructure locally or through mitigation by the development itself.*
- e) The proposal will not have a harmful visual impact on either the core of the village or the adjacent open countryside as a result of inappropriate design or signage.*

The above amendments are requested to ensure that the ANP complies with current national planning policy and adopted strategic local planning policy in relation to employment development. In the former case, the growth of Pocklington Industrial Estate across the A1079 York Road into the plan area would, firstly, strengthen the local and regional economy and so contribute to the achievement of sustainable economic development



under the NPPF 2019 and, secondly, accord with Paragraphs 80, 83(a) and 84 of that document which seek to build a strong, competitive economy and support a prosperous rural economy. In the latter case, such growth would accord with Policies S4 A and C6 and EC1 A1 and D1 of the Local Plan Strategy Document (2016), which support employment development in general where it contributes to the modernisation, development and diversification of the local economy and in the countryside where it is within or adjacent to an existing industrial estate or business park.

Furthermore, those amendments are requested so that employment development and the growth of Pocklington Industrial Estate are not excluded from the ANP, as the rural economy is an important element of national policy which is also emphasised in the recently adopted Local Plan further to the East Riding Rural Strategy (2012).

Finally, the above amendments are requested on the basis that employment development by way of the growth of Pocklington Industrial Estate onto, for example, our client's land would not adversely affect *'the rural outlook, the open views from the village and access to green spaces and the countryside'* as it would be located on the boundary of the Neighbourhood Plan Area. This would comply with Paragraph 5.3.10 of the ANP which states that consultees confirmed that those features were *'key to the quality of life in the Parish'*.

Development of our client's land would be similar in context to the pre-existing development at Allertorpe Business Park, Cofco Ltd and Pocklington Industrial Estate with direct access from the A1079 York Road.

Conclusion

We support the ANP in principle, subject to the aforementioned proposed changes to the following paragraphs:

- Paragraph 4.1.2 - to extend the ANP to cover employment development and the requirements of the local area;
- Paragraphs 5.4.2 and 5.44 - to extend Policy ANP05 to cover the growth of Pocklington Industrial Estate; and
- Paragraph 6.2.1 - to extend Policy ANP11 to cover the growth of Pocklington Industrial Estate.

If the above amendments were accepted, we would support the ANP in practice. Otherwise, however, we would object to it most strongly.

We trust the above is self-explanatory, however, if you have any queries, please do not hesitate to contact us.

In the meantime, we respectfully request that the above comments are taken fully into consideration as the ANP progresses to its next stage.

Finally, we would welcome acknowledgement of receipt of this letter and would be more than happy to discuss this matter further with you if deemed necessary.

Yours faithfully,

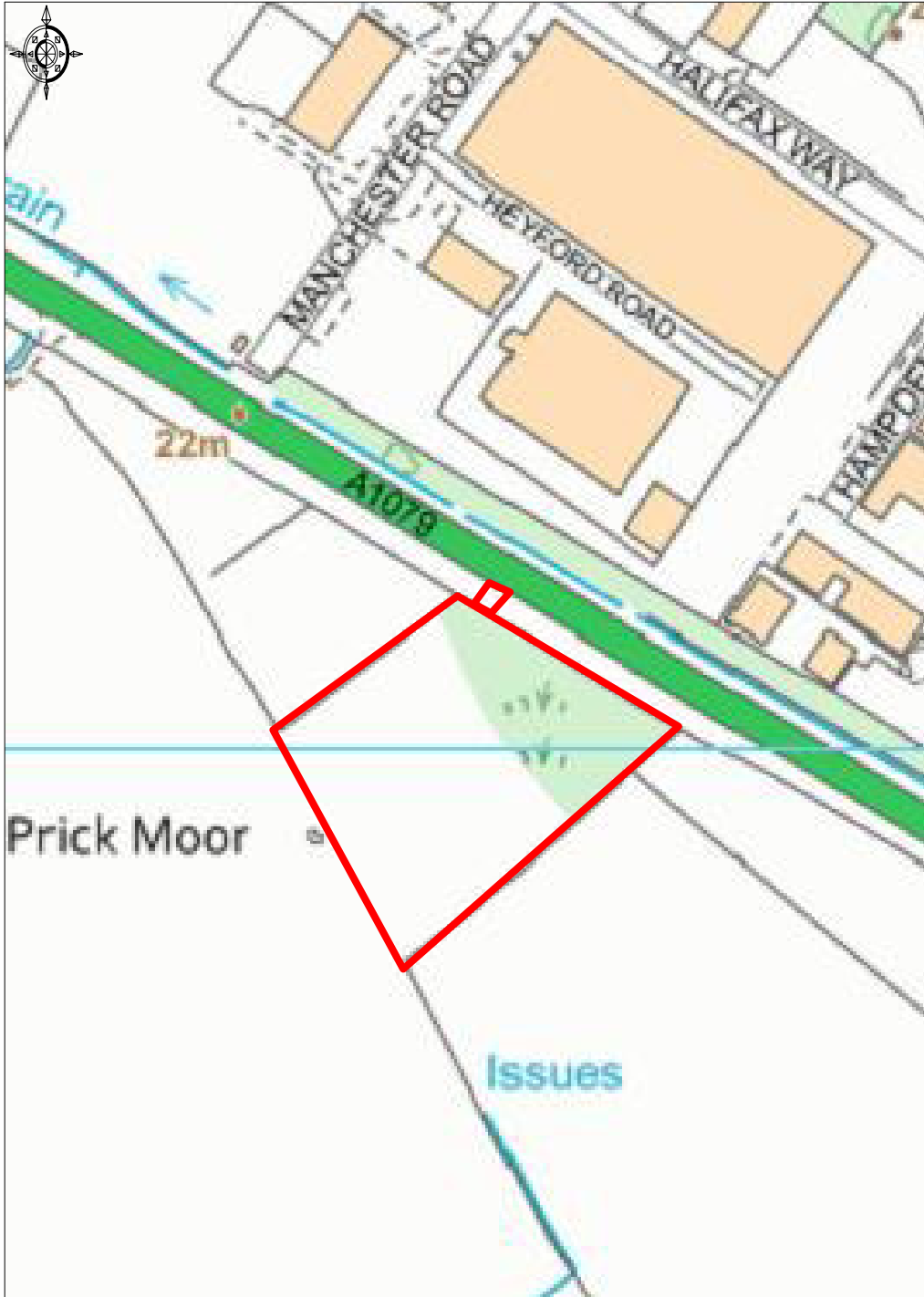
A handwritten signature in black ink, appearing to be 'Simon Craig', is written above the typed name.

Simon Craig BA (Hons) MSc
Assistant Planner
Rural Planning & Development

Enc: Site Location Plan

Land off York Road
(south of Pocklington Industrial Estate)

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