

Our ref: 40b – Planning Conformity/final responses/East Riding B1, B2 & B8 May 07

2 May 2007

Philip Parker
Head of Planning and Development Control
East Riding of Yorkshire Council
County Hall
Beverley
East Riding of Yorkshire

Dear Philip

Planning Application Number: DC/07/02183/STOUT/STRAT/JOS

Erection of a mixed use industrial park comprising B1 (Business), B2 (General Industry) and B8 (Storage and Distribution uses) at Land North of, Main Road, Newport, East Riding of Yorkshire.

The Assembly is grateful for the opportunity to comment on this proposed development. The Assembly, as the Regional Planning Body, has been asked to comment on this development as its nature and location mean that it could have an effect on the implementation of the Regional Spatial Strategy (RSS). The current RSS for Yorkshire and Humber (based on the Selective Review of RPG12) was issued by the Secretary of State in December 2004. The RSS has the status of a Development Plan Document and forms part of the framework for decisions taken under section 38 of the Planning and Compulsory Purchase Act (2004), which means that decisions on all applications have to be taken in accordance with the Development Plan unless other material considerations indicate otherwise.

The Planning and Compulsory Purchase Act (2004) and Circular 08/2005 make it clear that a draft RSS submitted to the Secretary of State is a relevant regional policy against which strategic applications can be considered. This Assembly response therefore also highlights relevant issues that arise from the Yorkshire and Humber Plan (draft RSS) December 2005 – the RSS submitted to the Secretary of State.

Both the existing and draft regional spatial strategies aim to achieve a more sustainable pattern and form of development, investment and activity across the

region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region's city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region (for example Policy P1, existing RSS, December 2004 and Policy YH5, Draft RSS, December 2005).

In seeking the implementation of these policies across the region, the Assembly therefore offers the following comments on the proposed erection of a mixed-use industrial park.

Regional Policy context

The proposed development does raise a number of serious issues for the implementation of RSS that need to be considered. The most significant of these is in relation to the proposed location of the development, with other environmental issues also being important considerations.

Office Use

The Assembly recognises that the proposed site already has planning permission for a B2/B8 unit. However the scale, nature and location of the proposal and the inclusion of B1 office units raises concern for the implementation of the Regional Spatial Strategy. Whilst the Assembly acknowledges that there is a need for workshop starter units and workshops, which will help to diversify the rural economy (supported by Policy E2 of current RSS and YH7 of draft RSS), the Assembly is concerned about the pure office component of the proposed development. This is a particular use that the RSS seeks to promote within town centres and not in such out of centre locations. Policy E4 of current RSS (2004) specifically states that "offices should be located in town and city centres" and this is reiterated in Policy E3 of draft RSS (2005) which also makes it clear that office use should mainly be accommodated in or adjacent to city and town centres. Policy E2 of draft RSS further reinforces these principles by stating, "city and town centres will be the main focus for office...and other uses which generate a high level of people movements (for example B1) uses. These uses should not be located outside these centres if they would undermine the delivery of the Plan's Core Approach (YH1-YH8)". If offices were to be ancillary to the other uses on the site, this would not cause such strategic spatial planning concerns.

Location and Nature of Development

Policies P1 and E4 of current RSS and YH8 of draft RSS provide for an urban-focussed, transport-orientated approach to development. Policies P1 (b) and E4 (a) of current RSS state that, wherever possible, development should be located within urban areas. Policy YH8A of draft RSS specifically states that the majority of new development should be concentrated within Regional and Sub Regional Centres,

with sufficient development in both Principal and Local Service Centres to fulfil their respective service roles. The proposed development is located outside the nearest settlements of Newport and North Cave. In draft RSS these types of areas are covered by Policy YH7 which aims to enhance and protect rural and coastal areas. It supports retaining and improving local services and facilities and economic diversification.

Policy P1 in current RSS (December 2004) requires a sequential approach to site selection. Its key locational requirement is that "wherever possible development should be located within urban areas". Therefore local planning authorities should seek to identify all the opportunities for development within urban areas, by adopting a sequential approach, which should start with suitable previously developed land. The need for greenfield development and the need to travel should be minimised. If sufficient land cannot be identified 'within' urban areas, Policy P1 requires that well-planned extensions to them should be considered next. It is only if sustainable forms of development cannot be found in the above manner that the third option needs to be considered which is at nodes along transport corridors. Policy YH8 of draft RSS (December 2005) also makes it clear that a sequential approach should be taken in determining applications to ensure that developments are either reusing land or buildings within centres, infilling sites within centres or are on sites that are well connected on public transport routes and that can maximise accessibility by public transport, walking and cycling. It is not evident that a sequential test has been carried out to demonstrate that other sites have been assessed and rejected.

Both current and draft RSS discourage development of greenfield land, and state that priority should in fact be given to the re-use of brownfield sites within settlements. Second priority should be given to other suitable infill opportunities, and thirdly, to planned growth areas. The proposed development site is greenfield and is currently used for farming purposes.

Need for Development

Policy E3 of current RSS (2004) states that local authorities should undertake a rigorous assessment of the amount of employment land that is needed. Policy E3 of draft RSS (2005) requires that the pattern and scale of allocated employment land should be determined by local employment land reviews, which take account of the forecasts and spatial guidelines set out in draft RSS (2005). Table 14.6 in draft RSS suggests the need for a net change in employment land for B2/B8 uses of between -4-22 ha of total employment land in East Riding of Yorkshire between 2006-2016. Notwithstanding the allocated site and permission, therefore, the Assembly would want to see evidence that a recent Employment Land Review has demonstrated the need for such a development of this scale, nature and location.

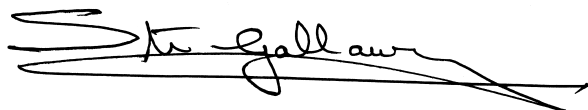
Conclusion

Given the comments set out above, it has been concluded that:

- Support for the proposal would need to be backed up by evidence of an Employment Land Review and sequential approach to site selection.
- The Assembly OBJECTS to proposal due to its nature, scale, and location.

If you have any queries about these points, please do not hesitate to contact Jenny Poxon on 01924 331555.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stephen Galloway', with a long horizontal flourish extending to the right.

Stephen Galloway
Chair, Regional Planning Board
Yorkshire and Humber Assembly