



YORK

CITY OF YORK
LOCAL PLAN
Pre-Publication Consultation Statement
February 2018

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1.0 Introduction

1.1 A city-wide consultation on the Local Plan Pre Publication Draft (Reg 18) commenced on the 18th September 2017 and finished on 30th October 2017. It was carried out in compliance with the Council's adopted Statement of Community Involvement (2007).

1.2 During the consultation period we have received responses from circa 1,295 individuals, organisation or interest groups. Given that those responding tend to raise multiple points this equates to around 4,000 representations.

1.3 The purpose of this report is to summarise this Pre-Publication consultation; it outlines the consultation documents that were produced, sets out who was consulted, the methods and techniques used during the consultation and summarises the main issues raised in the responses received. At the Plan's examination stage we will need to demonstrate that we have considered 'reasonable alternatives'; this process of iterative consultation will be critical in evidencing the Plan's development.

1.4 Copies of all responses received can be found on our website. A formal regulation 22(1)(c) statement will be prepared at such time as the local plan is submitted to the Secretary of State for examination. This Pre-Publication Draft Local Plan (Reg 18) statement relates only to responses received through the formal consultation period.

2.0 Consultation Documents

2.1 A number of documents were produced as part of the consultation to inform people of the process, how they could respond, and ways in which they could contact the Planning and Environmental Management team.

2.2 The following main consultation documents were produced:

- Pre-Publication draft Local Plan (Regulation 18 Consultation) (2017) and accompanying proposals maps (City Centre Inset/North/South)
- Strategic Housing Market Assessment Update (2017)
- Gypsy and Traveller Accommodation Assessment Update (2017)
- Sustainability Appraisal (2017) and Habitats Regulation Assessment (2017)
- Strategic Housing Land Availability Assessment and Annexes (2017)
- Employment Land Review Update (2017)
- Local Plan and Community Infrastructure Levy Viability Assessment (2017)

2.3 A comments form was available (see Annex A) and a series of large scale maps illustrating the further sites on an area by area basis were also prepared to help people interpret how the further sites relate to their communities. All relevant supporting documents and evidence base documents associated with the local plan were already published and available on the council's website, with a direct link provided from the main further sites consultation webpage.

3.0 Who was invited to make representations

3.1 To support the production of York's Local Development Framework (now Local Plan), the Council have compiled a database to include statutory/specific consultation bodies and stakeholders, alongside individuals and groups who have registered an interest in the York development plan process, or have expressed an interest in being kept informed of the Plan's progression towards adoption.

3.2 All Members received a briefing note setting out the proposed consultation strategy, and a copy of the main documents was placed in the Member's group rooms at West Offices. Consultation with neighbouring authorities, as part of the duty to cooperate, consisted of a series of 1-1 meetings and utilised existing structures through Local Government North Yorkshire and York and the Leeds City Region. Internal consultation was also undertaken with relevant officers.

3.2 Specific Consultees include Natural England, Historic England, the Environment Agency and Highways England, neighbouring authorities and parish councils. This group of consultees were sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information. Meetings with these groups were also arranged during the consultation period.

3.3 All other consultees on our database (around 10,000), which includes anyone who commented on any previous stages of the local plan or has otherwise registered an interest in planning in York, were sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information. A copy of the letters sent to consultees can be found at Annex B. In addition, the Council sought to further publicise the Preferred Sites consultation and give details on how and when comments could be made. This is discussed in Section 4 below.

4.0 How people were invited to make representations

4.1 The Local Plan Preferred Sites consultation was undertaken in accordance with the Council's adopted Statement of Community Involvement (SCI, 2007). Table 2 of the SCI sets out how and why community involvement will be sought. The consultation strategy was produced alongside colleagues in the Council's Communications Team and Neighbourhood Management Team. The consultation included:

- a press release to advertise consultation and how to respond was issued 15th September 2017;
- all documents and response forms were made available online at www.york.gov.uk/localplan and on the main City of York website consultation finder;
- hard copies of all the consultation documents, exhibition boards and response forms were placed in West Offices Reception; it was also possible for those who required hard copies to ring or email the forward planning team and request a copy of the documents;
- hard copies of all the consultation documents and response forms were placed in Council libraries for the duration of the consultation. In accordance with the SCI, all CYC libraries held a hard copy of the main Pre-Publication draft document, the proposals maps and a Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Summary. All other supporting documents were available to view online, with the help of guidance notes provided.
- 8-page Local Plan Special Edition of Our City delivered to every household in York via Our Local Link, with area based maps and free post response form;
- email or letter to all contacts registered on Local Plan database, including members of the public, statutory consultees, specific bodies including parish councils and planning agents, developers and landowners;
- staffed drop-in sessions/public exhibitions at venues across the City (see below);
- exhibition boards and consultation documents including response forms available at ward committee meetings;
- meetings with statutory consultees¹ and neighbouring authorities;
- presentation and question and answer session with York branch of the Yorkshire Local Council Association (attended by Parish Councils), York Property Forum/Chamber of Commerce and the Environment Forum; and
- targeted social media campaign via Facebook and Twitter running for the duration of the consultation.

4.2 There were several ways in which people and organisations were able to comment on the consultation documents. These were by:

¹ Statutory consultees are Historic England (HE), Environment Agency (EA), Natural England (NE) and Highways England (HEng).

- filling in the comments form (available on the Council's website, on the back page of the city wide leaflet and at the libraries/west offices/exhibitions);
- writing to the Local Plan team, via a freepost address;
- emailing the Local Plan team; or
- using the Council's online 'Current Consultations' tool (Survey Monkey) and completing an online response form with questions, via the Council's website.

4.3 A series of targeted meetings and exhibitions were arranged to publicise the consultation and engage with interested parties. The dates and venues of the public exhibitions were included in the city-wide publication of Our City. The exhibitions were staffed by officers and provided the opportunity for members of the public to find out about the consultation. Consultation material and area based maps were also available to view.

4.4 The City was split into five areas for the purpose of the maps to be contained in Our City (the follow the rivers/main roads to avoid dividing sites/residential areas). Eight public exhibitions were held across the city, each staffed by at least 2 officers and provided the opportunity for members of the public to find out about the consultation. Consultation material and area based maps were also available to view.

- Monday 2nd October at Strensall & Towthorpe Village Hall, Strensall (3pm-7:30pm)
- Wednesday 4th October at Fulford Social Hall, Fulford (3pm-7:30pm)
- Thursday 5th October at Clifton Library, Clifton (3pm-7pm)
- Monday 9th October at Tang Hall Library, Tang Hall (3pm-7:30pm)
- Wednesday 11th October at West Offices, York City Centre (3pm-7:30pm)
- Monday 16th October at Acomb Explore Library, Acomb (3pm-7:30pm)
- Tuesday 17th October at York Sport, Heslington (3pm-7:30pm)
- Wednesday 18th October at Oaken Grove Community Centre, Haxby (3pm-7pm)

4.5 A further exhibition was held at York College in the atrium on Thursday 19th October 2017 10am-2pm, specifically to target the views of young people.

4.6 Community Involvement (Neighbourhood) Officers were briefed and provided with consultation material to take to ward committees during the consultation period.

4.7 A briefing session for Parish Councils was held on Wednesday 27th September 2017 with the York Local Council Association which includes representatives from all Parish Councils across York.

4.8 Specific Consultees include Natural England, Historic England, the Environment Agency and Highways England, neighbouring authorities and parish councils. This group of consultees (approx. 100) were sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information.

4.9 Meetings with the above groups were also arranged during the consultation period (see section 5).

4.10 All other consultees on our database, which includes anyone who commented on any previous stages of the local plan or has otherwise registered an interest in planning in York (approx. 10,000), was sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information.

4.11 All Members received a briefing note setting out the proposed consultation methods and details of the consultation at the start of the consultation period, and a copy of the main documents was placed in the Member's group rooms at the Council's West Offices.

4.12 All Directors, Assistant Directors and other relevant officers were sent details of the consultation and informed where they could view the documents.

4.13 In addition to the more formal approaches for cooperating with prescribed bodies and other relevant organisations, City of York Council has engaged on an on-going basis through an extensive series of informal (but recorded) meetings with such bodies and organisations, on a largely one-to-one basis, in relation to the Duty to cooperate. The following meetings took place as part of Preferred Sites consultation.

The Environment Agency (EA)	Discuss potential flood alleviation schemes	28/09/2017
Harrogate Borough Council	CoYC and HBC to update each other of the latest position regarding their respective local plans and discuss cross-boundary issues. Also discuss the need for HBC to be consulted on the Poppleton Neighbourhood Plan HRA.	25/04/2017
Historic England	Discuss City of York Local Plan Pre-Publication Document and strategic issues	26/09/2017
Selby District Council	For CYC to inform SDC with regard to CYC York Local Plan Pre Publication Draft (Regulation 18) Consultation, September 2017 (PPDRC). For SDC to inform CYC with regard to the	17/10/2017

	position on the Selby Local Plan. To identify any strategic cross boundary issues	
York, North Yorkshire and East Riding Local Enterprise Partnership (LEP)	LEP-chaired workshop to enable CYC's officers to receive / discuss views from the officers attending representing prescribed bodies to help CYC show that cooperation under the duty can or will lead to improved outcomes as the CYC Local Plan progresses from Pre-Publication stage.	24/10/2017
Yorkshire Water	For CYC to update YW with regard to the City of York Local Plan Pre Publication Draft (Regulation 18) Consultation, September 2017 (PPDRC). To confirm that there are not likely to be any water supply or waste water treatment 'showstoppers' and discuss Yorkshire Water's infrastructure investment plans.	26/10/2017
Hambleton District Council (HDC)	To inform HDC with regard to CYC York Local Plan Pre Publication Draft (Regulation 18) Consultation, September 2017 (PPDRC). For HDC to inform CYC with regard to the position on the Hambleton District Local Plan (HDLP). To identify any strategic cross boundary issues	25/10/2017
Highways England	To discuss CoYC York Local Plan Pre Publication Draft (Regulation 18) Consultation, September 2017 (PPDRC); the impacts of the PPDRC on the Strategic Road Network (Primarily the A64); a new Junction on the A64 to provide access to Strategic Site ST15.	3/10/3017
Leeds City Region Local Enterprise Partnership (LCR LEP)	For CYC to discuss the York Local Plan Pre Publication Draft (Regulation 18) Consultation, September 2017 (PPDRC) with LCR LEP	27/10/2017

Local Council Association	To discuss the York Local Plan Pre Publication Draft (Regulation 18) Consultation, September 2017 and advise of consultation process.	27/09/2017
Natural England	Discuss City of York Local Plan Pre-Publication Document and strategic issues	05/09/2017

This table excludes regular sub-regional or sub-area meetings, and meetings for specific projects, where formal minutes or notes are otherwise available, as follows:

- Leeds City Region (LCR) Strategic Planning Duty to Cooperate Group
- LCR Community Infrastructure Working Group
- Local Government North Yorkshire and York (LGNYY) Spatial Planning and Transport Board
- LGNYY Spatial Planning and Transport Technical Officers Group (TOG)
- York Sub-area Joint Infrastructure Working Forum (YSAJIWF)
- North Yorkshire Development Plans Forum
- East Coast Mainline Authorities group (ECMA)
- ECMA Technical Officers Group
- Rail North (potential Rail Franchisor under decentralisation)
- Business Case for improving the York-Harrogate-Leeds line
- TransPennine Electrification
- Asset Board
- A64 Officer's Group

5.0 Main Issues Raised

5.1 The purpose of this section is to outline the main issues raised by respondents as part of the further sites consultation. Responses are presented in Section and Policy order, as per the Local Plan Pre-Publication Draft Sep 2017 document. The sections which follow deal with Alternative Sites submitted for consideration, the Sustainability Appraisal and Heritage Impact Appraisal, Duty to Co-operate and other issues raised in relation to the methodology, spatial strategy and to the Plan in general.

5.2 It should be noted that the views expressed below are of those who submitted representations as part of the consultation and not necessarily the views of City of York Council. For clarity, a single consultee's response may have been captured multiple times in reference to a single site (where they have objected to some elements of the site proposal, but support others, for example).

5.2 Respondents include residents, interest groups, parish councils, prescribed bodies², developers, agents and land owners.

² Under the Duty to Co-operate Local Authorities are required to demonstrate cooperation in plan making with adjoining authorities and other organisations. The Town and Country Planning (Local Planning) (England) Regulations 2012 prescribes those bodies to which the Duty to Co-operate applies.

Section 2: Vision and Development

DP1: York Sub Area	
Total respondents: 20	Support: 11
Key Issues Raised	Objections: 4
	Comments: 8
Support	<p>Selby District Council and North Yorkshire County Council support the policy.</p> <p>Historic England supports the definition of a green belt, which will help safeguard the City's special historic character and setting.</p> <p>Several developers support that the local plan will seek to meet the housing needs of current and future populations including those arising from economic and institutional growth.</p> <p>Askham Bryan College support objective 'iv' and reference to the Council supporting the further success of higher and further education institutions.</p>
Objection	<p>Strensall with Towthorpe Parish Council and two other respondents generally support the policy, but state that viii) needs amending to place the outer boundary of the Green Belt at <u>about</u> 6 miles from City Centre.</p> <p>Historic England suggests moving criterion (vi) to the beginning of the list of criteria and has provided amended text.</p> <p>East Riding of Yorkshire Council Policy highlight that a small part of ERC's authority area would lie within 6 miles of the city centre boundary and do not consider it appropriate for the York Local Plan to prescribe the exact extent of the outer Green Belt boundary where this would extend into a neighbouring local authority area. Provided amended wording.</p> <p>Network Rail considers that (v) should be updated to reflect the change in project priorities since the publication of the plan.</p> <p>York Green Party does not think that (v) 'improvements to the outer ring road' should be listed as an element of 'City of York's role as a key node for public transport'. Provided amended wording.</p>
Comment	<p>York and North Yorkshire Chamber of Commerce state that there is a disconnect between the broad ambitions in the plan and how they are to be delivered.</p> <p>Persimmon state that York fails to plan for necessary housing growth and increased employment which will result in housing pressure in neighbouring authorities as there will be insufficient housing stock within York itself to accommodate this growth.</p>

	Nether Poppleton Parish Council, Upper Poppleton Parish Council and Poppleton Neighbourhood Plan Committee state that, although the city centre of York is defined in the Plan, the centre of the city is not and this is a requirement of calculating the extent of the green belt (6 miles from the centre of York).
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DP2: Sustainable Development			
Total respondents: 25	Support: 8	Objections: 9	Comments: 20
Key Issues Raised			
Support	<p>Environment Agency supports the policy as it sets out that development will help protect the environment in a number of ways.</p> <p>Highways England fully supports the vision to deliver a fundamental shift in travel patterns and the focus of promoting sustainable development in areas of good accessibility.</p> <p>York Cycle Campaign is pleased to see cyclists considered and included in the Sustainable Development Plans for York (DP2) and in the Sustainable Access plans (T1)</p> <p>Canal and River Trust welcomes the reference within policy to ensure development will help the environment by maintaining water quality in the Ouse and improve air quality and limit environmental nuisance.</p> <p>Generally respondents are supportive of the spatial vision and the long term contribution to sustainable growth to address housing and community needs.</p> <p>A developer suggests that the policy should be expanded to include support for the utilisation of previously developed land in line with Government policy.</p>		
Objection	<p>Environment Agency highlights that the list of bullet points does not include remediation of polluted land/ groundwater or the protection of groundwater. Two additional bullet points suggested. Also recommend that a point is included within policy DP2 or Policy CC2 to ensure that appropriate water efficiency measures are secured for developments.</p> <p>Historic England suggest amendment to the heading of iii) to read: "Development will help conserve and enhance the environment through...". and iii) first bullet point, to read: "conserving, and where appropriate enhancing, those elements which contribute to the special character and setting of the historic City by ensuring that development is in acceptable locations and of the highest standards in terms of urban design and detailing"</p> <p>Strensall with Towthorpe PC wish to see the River Foss included in the</p>		

	<p>rivers for which water quality should be maintained in iii).</p> <p>Network Rail suggest an amendment to iv) to reflect sustainability objectives.</p> <p>Green Party generally supports the policy but suggest changes to several bullet points to strengthen the policy.</p> <p>Yorkshire Wildlife Trust states that the policy should include an extra bullet point with a specific mention of biodiversity.</p> <p>National Railway Museum seeks an additional bullet point which explicitly seeks to protect and enhance the visitor economy through supporting existing facilities, promoting new development and encouraging improved infrastructure.</p> <p>McArthur Glen states that the supporting text should clarify that this measure of control is not intended to prevent appropriate expansion at the York Designer Outlet</p> <p>CPRE suggest amendments to better reflect the need for new development to consider new green infrastructure as well as conserving and enhancing existing networks.</p>
<p>Comment</p>	<p>Environment Agency is keen to see water efficiency measures being promoted and highlight the need for abstraction and/or discharge permits, as necessary.</p> <p>Dunnington Parish Council state that any development in Dunnington will have to deal with the inevitable shortage of school places, play areas, playing fields and other green spaces due to the rise in population.</p> <p>Nether and Upper Poppleton Parish Councils make comments in relation to prevention of homes flooding, modal transport shift.</p> <p>Some developers state that the principles in this policy cannot be achieved with a local plan that fails to plan for the full OAHN it requires and that emphasis should be placed on the flexibility of this policy.</p> <p>One respondent felt that the policy means nothing when the local planning authority is still cautious about renewable energy.</p> <p>Another suggested that housing in York is not sustainable, 40% of jobs in York are in the tourist industry and low paid whereas the house prices are some of the highest in the North.</p> <p>Another response states that the plan needs to be more ambitious in regards to transport.</p>

DP3: Sustainable Communities	
Total respondents: 22	Support: 6
Objections: 2	Comments: 26
Key Issues Raised	
Support	<p>Historic England supports the policies aim to ensure that new development both conserves those elements which contribute to the character of the City and also enhances its distinctive character.</p> <p>Dunnington Parish Council supports the comments on housing mix and that sustainable villages require a mix of household types to support a range of local amenities.</p> <p>Several developers support the principles in this policy.</p>
Objection	<p>Fulford Parish Council suggests a wording change to (xi) to strengthen the protection of air quality.</p> <p>The Homes and Communities Agency recommends that (v) should be amended to replace 'create' with 'contribute to'.</p> <p>DIO (MOD) suggest that the following additional sentence is incorporated at the end of criterion ix: "...and development of previously developed land where appropriate".</p>
Comment	<p>Highways England recognises that (xi) applies equally to the city's primary roads and the A64 and that that physical mitigation measures will be needed in addition to the range of sustainable transport measures, particularly on the A64.</p> <p>Several parish councils and community groups raise a number of issues that should be addressed in the policy to create sustainable communities e.g. provision of facilities, school buses, driveway/gardens with non-porous surfaces.</p> <p>York Green Party suggests wording changes to the policy to emphasise the importance of environmental issues.</p> <p>Several developers and agents commented that they had no objection to the policy but suggested some minor alterations to wording.</p>

DP4: Approach to Development Management	
Total respondents: 3	Support: 1
Objections: 1	Comments: 1
Key Issues Raised	
Support	Gladman Developments consider that the policy reflects the presumption in favour of sustainable development.
Objection	Henry Boot Developments consider that many of the draft policies require an increasing number of complex supporting documents covering peripheral / ancillary issues for no apparent planning benefit.
Comment	The Green Party ask that a comment about working with applicants at an early stage is added to the policy.

Section 3: Spatial Strategy

SS1: Delivering Sustainable Growth for York	
Total respondents: 58	Support: 13
Objections: 45	Comments: 17
Key Issues Raised	
Housing Growth	
Support	<p>Support was received from a number of organisations for the Council to meet their entire objectively assessment housing need (OAHN). Some supported the 867 dpa target on this basis.</p> <p>Hambleton District Council comments the methodology is the same as theirs. They consider that the Plan identifies sufficient land to meet the development needs of the City and establishes a Green Belt enduring 20 years. However, the representation also raises concerns in relation to lack of safeguarded land and opportunity to accommodate the increased level of growth proposed in the White Paper, should this be required.</p> <p>CPRE support decision to not adopt a 10% uplift allowing for market signals as it does not give weight to the special character and setting of York and important environmental constraints. They also consider that 867 dpa is more deliverable although recognised to be above the average rate for York.</p> <p>North Yorkshire County Council support policy SS1 in general. They also support the recognition and inclusion of windfall development in addition to allocations as a means of achieving additional flexibility for housing delivery.</p> <p>Some Parish representations support the 867 dwellings per annum figure over the Government's standardised methodology figure of 1070 dpa.</p>
Objection	<p>The majority of responses on this issue, particularly planning agents and developers, strongly object to using 867 dwellings per annum as the starting point for York's OAHN. The current estimate of housing is deemed significantly flawed and 'unsound' because:</p> <ul style="list-style-type: none"> • It does not comply with the Strategic Housing Market Assessment (2017) evidence base. • There is no evidence to support the current approach and it is therefore not 'justified'; • The 867 dpa figure is a 'policy on' intervention, which is not in conformity with NPPF; NPPF requires the OAHN to be 'policy off' when considering OAHN; • The current figure is not realistic to adequately satisfy the future

housing needs of the city; It will exacerbate affordability and inequality. It is therefore 'not effective'.

- It does not include a market signals uplift or consideration for affordability. All concur that this should be included and some consider that 20% market uplift is warranted as opposed to 10% included in the SHMA recommendation.
- It is not considered to be in the spirit of 'positive' planning.
- It is lower than the Government's figure released (1070 dpa) as part of their consultation on a standardised methodology (Sept 2017). Some representations think this figure should be taken forward.
- The Council has taken the wrong approach to estimating housing commitments and backlog by including student housing in the figures;
- The backlog figure for York is too low;
- Windfalls are relied upon for supply in the long-term. Windfalls should only be used for flexibility, not part of the supply.
- There is no demonstration of flexibility.
- The housing target should be wholly expressed in policy SS1 to include the backlog applied ($867+56 = 923$ dpa as per the trajectory table);
- A 10% non-implementation rate should be applied to commitments.

There was general concern, particularly from landowners and agents and some neighbouring authorities, that significant additional allocations are required to address the shortfall, particularly in the short-term. Some representations consider that the council should over-allocate land to ensure green belt permanence and flexibility.

Additional independent housing requirement reports submitted by planning consultants on behalf of clients recommend a minimum of 1,150 dpa. These include alternative household formation rates and exclude student housing from commitments and backlog. Previous reports were also alluded to/appended, which support target ranges of 920-1070 dpa and 1,125 and 1,255 dpa.

Some members of the public objected to all housing growth/ the scale of housing growth and/or 867 dpa given the impact on the environment, congestion and climate change.

Fulford Parish Council object to the plans stated intention of meeting the development requirements of the city in full within the York local authority area. They consider that this policy position has been taken by default, without considering the impact that meeting the aspiration will

	<p>have on the historic setting and character of the city. FPC considers that the cumulative impact of the developments proposed would greatly harm the open land setting of the City which makes such an important contribution to the setting and special character of York.</p>
Comment	<p>Historic England suggestion that the plan needs to demonstrate that it can deliver the scales growth anticipated in a manner commensurate with safeguarding these elements which make York a special place.</p> <p>CPRE consider that some population figures used by GL Hearn to provide the OAN may result in residents using York to commute elsewhere. They are therefore concerned about potential double counting and an artificially high OAN being produced; CYC should ensure this is not the case.</p> <p>It is of a great concern to all stakeholders of the York Local Plan that it should be considered sound. It is therefore crucial the Plan is positively prepared to meet the objectively assessed need. Not meeting the OAHN jeopardises the adoption of the both the plan and therefore the adoption of an enduring green belt as a result of insufficient sites being identified for development in the long-term.</p> <p>Some members of the public concurred that sufficient housing should be included to reduce affordability issues. They also commented on the components of change and the influence of migration on housing growth.</p> <p>The plan period for which the target applies needs clarifying.</p>
Spatial Strategy	
Support	<p>Support was received from a number of organisations for the Council to meet their entire objectively assessment housing need (OAHN). Some supported the 867 dpa target on this basis.</p> <p>Hambleton District Council comments the methodology is the same as theirs. They consider that the Plan identifies sufficient land to meet the development needs of the City and establishes a Green Belt enduring 20 years. However, the representation also raises concerns in relation to lack of safeguarded land and opportunity to accommodate the increased level of growth proposed in the White Paper, should this be required.</p> <p>CPRE support decision to not adopt a 10% uplift allowing for market signals as it does not give weight to the special character and setting of York and important environmental constraints. They also consider that 867 dpa is more deliverable although recognised to be above the average rate for York.</p> <p>North Yorkshire County Council support policy SS1 in general. They</p>

	<p>also support the recognition and inclusion of windfall development in addition to allocations as a means of achieving additional flexibility for housing delivery.</p> <p>Some Parish representations support the 867 dwellings per annum figure over the Government’s standardised methodology figure of 1070 dpa.</p>
Objection	<p>The majority of responses on this issue, particularly planning agents and developers, strongly object to using 867 dwellings per annum as the starting point for York’s OAHN. The current estimate of housing is deemed significantly flawed and ‘unsound’ because:</p> <ul style="list-style-type: none"> • It does not comply with the Strategic Housing Market Assessment (2017) evidence base. • There is no evidence to support the current approach and it is therefore not ‘justified’; • The 867 dpa figure is a ‘policy on’ intervention, which is not in conformity with NPPF; NPPF requires the OAHN to be ‘policy off’ when considering OAHN; • The current figure is not realistic to adequately satisfy the future housing needs of the city; It will exacerbate affordability and inequality. It is therefore ‘not effective’. • It does not include a market signals uplift or consideration for affordability. All concur that this should be included and some consider that 20% market uplift is warranted as opposed to 10% included in the SHMA recommendation. • It is not considered to be in the spirit of ‘positive’ planning. • It is lower than the Government’s figure released (1070 dpa) as part of their consultation on a standardised methodology (Sept 2017). Some representations think this figure should be taken forward. • The Council has taken the wrong approach to estimating housing commitments and backlog by including student housing in the figures; • The backlog figure for York is too low; • Windfalls are relied upon for supply in the long-term. Windfalls should only be used for flexibility, not part of the supply. • There is no demonstration of flexibility. • The housing target should be wholly expressed in policy SS1 to include the backlog applied (867+56 = 923 dpa as per the trajectory table); • A 10% non-implementation rate should be applied to commitments. <p>There was general concern, particularly from landowners and agents</p>

	<p>and some neighbouring authorities, that significant additional allocations are required to address the shortfall, particularly in the short-term. Some representations consider that the council should over-allocate land to ensure green belt permanence and flexibility.</p> <p>Additional independent housing requirement reports submitted by planning consultants on behalf of clients recommend a minimum of 1,150 dpa. These include alternative household formation rates and exclude student housing from commitments and backlog. Previous reports were also alluded to/appended, which support target ranges of 920-1070 dpa and 1,125 and 1,255 dpa.</p> <p>Some members of the public objected to all housing growth/ the scale of housing growth and/or 867 dpa given the impact on the environment, congestion and climate change.</p> <p>Fulford Parish Council object to the plans stated intention of meeting the development requirements of the city in full within the York local authority area. They consider that this policy position has been taken by default, without considering the impact that meeting the aspiration will have on the historic setting and character of the city. FPC considers that the cumulative impact of the developments proposed would greatly harm the open land setting of the City which makes such an important contribution to the setting and special character of York.</p>
<p>Comment</p>	<p>CPRE consider that the impact of housing developments elsewhere in the city will impact detrimentally upon the historic character and setting as well as infrastructure provisions of the City.</p> <p>Clarity is required regarding how the spatial strategy links to the presumption in favour of sustainable development (NPPF).</p> <p>Yorkshire Wildlife Trust suggest a clarification of bullet point three of Policy SS1: Locally significant nature conservation sites could be changed to '<i>locally designated Sites of Importance for Nature Conservation or SINC</i>'. This should help to distinguish between SINC and SLI's.</p> <p>Historic England recommend the following suggested text amendments to refer to both impact of location and scale of growth, and to recognise the contribution of the rural landscape to the special character and setting of the City, as follows: Para 3.5, "<i>...are illustrated in Fig 3.1. However, the open countryside beyond the ring road also makes an important contribution to the wider rural setting of the historic city</i>", and Policy SS1, "<i>The location and scale of development through the plan...etc</i>".</p> <p>Some respondents requested more detailed maps of the spatial shapers</p>

	are provided.
Employment Growth	
Support	<p><u>Vision for Growth</u></p> <p>There was general support for the Local Plan to positively and proactively encourage sustainable economic growth, including tourism and leisure.</p> <p>Leeds City Region Local Enterprise Partnership support the allocation for employment, feeling that generally, policies within the Plan set out a presumption in favour of sustainable development that seeks to accelerate economic growth and attract inward investment which is consistent with the SEP and its good growth narrative.</p> <p>West Yorkshire Combined Authority says York's economic growth ambitions in the plan are consistent with the LCR Employment and Skills Plan and LEP/WYCA priorities.</p> <p>North Yorkshire County Council, Historic England, Rachael Maskell MP, Parish Councils and Neighbourhood Plan Groups all support the general approach to focus retail development in the City Centre and reduce / limit future development at out of town locations.</p> <p>Yorkshire Wildlife Trust was generally supportive for vision for economic growth.</p> <p><u>Linkages between housing and economic growth</u></p> <p>North Yorkshire County Council support the ambitions for growth and stated aim that the housing needs of City of York 's current and future population, including that arising from economic and institutional growth is met within the York local authority area.</p>
Objection	<p><u>Economic Growth Forecast</u></p> <p>A few objections or comments from developers expressed confusion around timeframes used to determine annual job growth figures (2017-2038) vs annual housing figures, which are apportioned across a 15 year timeframe.</p> <p>Some representations recognised the uncertainties inherent to long term economic forecasting and therefore disagree with the cautious approach using the baseline forecast to inform the employment land requirements of the Plan.</p> <p><u>Vision for Growth</u></p>

	<p>York and North Yorkshire Chamber of Commerce, consider that there is a disconnect between the broad ambitions of the plan (Policy DP1) and how they will be delivered. They, and a number of developer representations, consider that housing and employment policies are restrictive and that employment land supply will not cater for York's future needs. Consequently, the approach will constrain economic growth.</p> <p>In addition, comments were received that many commercial and industrial businesses cannot be accommodated within the York Urban Area and that the plan risks being found unsound with such little allocation for employment growth.</p> <p>Home Builders Federation feel the LEPs ambition for growth has not been considered and this is reflected in low housing / employment allocations.</p> <p>York and North Yorkshire Chamber of Commerce note the conflict between acknowledging the universities importance for growth but failure to allocate sufficient land for expansion.</p> <p>A few members of the public oppose, or question, economic growth as a goal in of itself saying it is incompatible with UK climate change targets / environmental sustainability.</p> <p><u>Linkages between housing and economic growth</u></p> <p>York TUC stress that the cost of housing is already impinging on companies and public services abilities to recruit staff leading also to a major loss of employment sites (especially city centre offices and Clifton Moor Sites) due to the imbalance between housing and employment land values caused by a housing shortage. York TUC and many Parish Councils stress the need to protect employment sites (MOD and city centre office space) from conversion to residential use.</p> <p>A few members of the public also comment on stemming the loss of city centre office space for residential use.</p> <p>There is a requirement to serve the latent demand for homes and encourage growth and diversification of the economy by broadening the supply and availability of employment land and premises.</p>
Comment	<p><u>Vision for Growth</u></p> <p>Some representations consider that York's opportunity to build upon an</p>

	<p>already diverse economy and positively encourage new employers by having a good range of deliverable new employment sites supporting economic vitality and new jobs is constrained by land supply.</p> <p>Some members of the public asked where jobs were coming from and how the city will attract and sustain new firms.</p> <p>Historic England stress economic growth must not be to the detriment of conservation of the city.</p> <p><u>Range and supply of sites</u></p> <p>National Railway Museum and York Racecourse felt the plan should do more to support the expansion of local tourist attractions.</p> <p><u>Employment sectors</u></p> <p>National Farmers Union felt planning policy could do more to support diversification of the rural economy, allowing conversion of farm buildings to create out of town centre tourist attractions / accommodation.</p> <p><u>Forecasts</u></p> <p>Clarity is required in relation to which employment forecast is used.</p>
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SS2: The Role of York's Green Belt			
Total respondents: 34	Support: 9	Objections: 24	Comments: 8
Key Issues Raised			
Support	<p>Several adjacent Local Authorities and Parish Councils support the principles set out in the policy and welcomes that 'The Green Belt's prime purpose is that of preserving the setting and special character of York';</p> <p>In general, responses are supportive that the Green Belt should be protected whilst taking a proportionate amount of land to allow for appropriate levels of growth to be supported by suitable infrastructure with the intention to give the Green Belt a degree of permanence to 2038;</p> <p>Two Parish Councils and members of the public support the removal of safeguarded land from the Local Plan.</p>		

Objection	<p>Historic England state that:</p> <p>A Green Belt which might need to be amended only 5 years after the end date of this local plan does not appear to have the degree of 'permanence' expected by national planning guidance;</p> <p>Reference should also be made to safeguarding the special character and setting of the 'historic' city.</p> <p>First para of SS2 should be amended to read: "The primary purpose of the green belt it to safeguard the special character and setting of the historic city of York. New building in the green belt etc..."</p> <p>Selby District Council questions whether a Green Belt boundary enduring 20 years is sufficient.</p> <p>The majority of objections to policy SS2 and the omission of safeguarded land in the Plan are made by developers -for the following reasons:</p> <ul style="list-style-type: none"> • Tightness of the Green Belt boundary may not be sufficient to endure beyond plan period; • Plan period should be extended to 2038 and an additional 20% buffer should be provided in relation to allocations to allow for flexibility; • Safeguarded Land should be identified to meet longer-term development needs stretching well beyond the plan period; • No policy stating that Green Belt boundaries are as shown on the Proposals Map; • 20 year 'life' for the Green Belt is not consistent with the NPPF intention that boundaries should have permanence in the long term. This is usually determined by the expectation that boundaries will not need to be reviewed for at least 25 years, but preferably longer; • The lack of 'permanence' invites a review of the green belt boundaries and a lack of protection; • Land which is unnecessary is kept permanently open should not be included within the greenbelt; • Without a proper assessment and attempt to accommodate the OAHN the Green Belt boundary cannot be justified or evidenced; • Need to provide sufficient land to ensure that the Green Belt remains unaltered well beyond the plan period; • Insufficient allocated sites and no safeguarded land means that there will be nowhere to develop in York; • The approach conflicts with legal advice if no safeguarded land is identified in the emerging Local Plan this would give rise to a serious
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	<p>risk of the Plan being found unsound;</p> <ul style="list-style-type: none"> Given no safeguarded land, the plan fails to justify the end date with allocations as presented in the trajectory. <p>Some members of the public had similar views and stated that:</p> <ul style="list-style-type: none"> Green Belt permanence of only five years after the plan period is totally insufficient given how long it has taken to deliver the current local plan; Broad brush green belt outside urban area is inconsistent with NPPF guidance which states that local authorities should "not include land which it is unnecessary to keep permanently open"; Green Belt boundaries should be reduced to introduce safeguarded areas which can be used to meet long term development needs stretching well beyond the plan period; <p>In addition, comments from the public include:</p> <ul style="list-style-type: none"> Boundary put forward in this plan is based on the 2003 York Green Belt Appraisal. This did not assess all five functions of Green Belt in NPPF and must be considered as an unsound basis upon which to define the inner Green Belt boundary; Local Plan is too protective of the Green Belt. Green Belt land is important to prevent urban sprawl and to provide residents access to the outdoors. However, it is protecting agricultural land of limited access and biodiversity; <p>Local Authority has failed to establish any exceptional circumstance that would necessitate the removal of land from the Green Belt which fulfils Green Belt functions in NPPF 80.</p>
Comment	<p>Galtres Garden Village Development Company comments that the commentary on Green Belt speaks from a position that assumes the boundaries are fixed in an adopted plan; and that this is erroneous as the boundaries are being defined.</p> <p>Environmental groups state that the Green Belt should be protected as much as possible.</p>

SS3: York City Centre			
Total respondents: 18	Support: 9	Objections: 7	Comments: 10
Key Issues Raised			
Support	Historic England supports the proposals for the city centre, including the stated development principles and state that together these should help		

	<p>safeguard and enhance the elements that contribute to the special character of this part of York.</p> <p>York Green Party supports the policy wording ‘Change of use of existing Use Class A, B1(a) and town centre leisure, entertainment and culture uses will be resisted’</p> <p>GVA (on behalf of the Homes and Communities Agency (HCA)) are generally supportive of the intent of this policy particularly the provisions to promote accessibility and movement and welcomes its inclusion within the Local Plan.</p> <p>Support of the policy has been shown by Lichfields (on behalf of Hungate (York) Regeneration Ltd) and Arup (on behalf of York Central Partnership)</p> <p>York Minster support reference to the Minster Precinct in policy.</p> <p>General support was provided for the policy objectives with particular reference to the proposals for Castle Piccadilly, the Railway Station and National Railway Museum. Whilst support was also voiced to the re-letting of vacant shops and conversion of the upper floors of properties.</p>
<p>Objection</p>	<p>Network Rail believes that principle xi needs to be more robustly worded and suggests wording that seeks delivery of enhancements to the existing bus interchange facilities which shall provide a seamless journey, a clear less congested transition for passengers and demonstrate good urban design.</p> <p>GVA (on behalf of the Homes and Communities Agency (HCA)) comment that to allow for greater flexibility for the redevelopment of York Central and given the interconnected nature between the allocation and the rest of the city centre, the HCA requests that the city centre boundary is extended to all of the proposed allocation. They believe that the policy should be amended so that the importance of an appropriate amount of retail development necessary to support the local community, both within and around the site, is recognised and weighs in favour of a future planning application. Policy amendments should be made to clarify that sequential and impact assessments should not be required for other uses referred to in the policy (in line with NPPF) where those uses are proposed within the city centre boundary.</p> <p>York Minster’s response, whilst supporting specific reference to the Minster, is concerned over lack of status afforded to Minster as a principle area of York and absence of a supportive policy in plan. Provides suggested policy for the Minster, including maintaining a high quality Minster Quarter, enhancing the setting, supporting improvement</p>

	<p>of the precinct and any new development to be of outstanding quality and design. In addition, they attach a boundary accurately reflecting the extent of their ownership to update Minster Precinct on the Proposals map..</p> <p>General objection received to this policy provide comment that whilst York is a city of culture and a major tourist destination the needs of residents should be met first. Concerns have been raised to the view that too many shops are closing and are being replaced by restaurants and coffee shops. A policy should be implemented that limits these changes and attracts good quality shops whilst CYC should also consider a reduction in rental charges to encourage more retail units within the centre.</p> <p>A comprehensive approach has been suggested by some objectors to this policy that would improve pedestrian and cycle connectivity and that city centre road space should be re-allocated in favour of sustainable transport whilst ensuring the centre is still accessible for businesses, residents and visitors alike. Reduced congestion and improved air quality should be sought.</p> <p>Further concern was expressed over the wording in the policy regarding York Minster stating that it is not accurate to refer to York as having a single 'religious life'.</p>
<p>Comment</p>	<p>The National Railway Museum comments that policy should allow for greater flexibility for the redevelopment of York Central and given the interconnected nature between the allocation and the rest of the city centre, they request that the city centre boundary is extended to all of the proposed allocation. They believe that the policy should be amended so that the importance of an appropriate amount of retail development necessary to support the local community, both within and around the site, is recognised. Policy amendments should be made to clarify that sequential and impact assessments should not be required for other uses referred to in the policy (in line with NPPF) where those uses are proposed within the city centre boundary. They support the provisions within this policy that promote accessible movement (particularly pedestrian and cycling) and improve linkages between key places. Improved access between the NRM, York Central and the rest of the City is very important.</p> <p>The Canal & River Trust welcomes the policy principle under part vii to enhance the setting of the Ouse and access to the riverside.</p> <p>General positive comments are provided to this policy from the York Green Party. However, they are disappointed that there is no mention of city centre residents. They state that the Plan should be more clearly</p>

ambitious about seeking a largely car free city centre and further strengthen the requirement to protect and provide green space for city centre residents, workers and visitors. They suggest the several amendments to achieve this.

Lichfields (on behalf of Hungate (York) Regeneration Ltd) agree with the general principles of this policy but considers that there should be emphasis on the scope of the City Centre to deliver more new homes. Clarity should be provided within the policy in terms of the capacity of the Hungate development site not just phase 5+.

Arup on behalf of the York Central Partnership are generally supportive of this policy, however, would welcome the inclusion of York Central (ST5) within the policy area that would allow for consistency and clarity for the policy application across the site.

GVA on behalf of the Homes and Communities Agency (HCA) point out that this policy, along with others, require all A1 retail development outside the Primary Shopping Area are currently required to undertake a sequential and impact assessment. Whilst this is in accordance with NPPF such an approach could harm the ability of York Central Partnership to allow for a comprehensive and sustainable development (at ST5) that meets the needs of its future community including both the residents and workforce.

Poppleton Neighbourhood Plan Committee passed comment that the loss of shopping from the city centre and increasing number of vacated shops is problematic and will deter visitor footfall. The possible use of temporary art exhibitions or displays from schools/colleges would be better than empty premises. They cite the work that Civic Trust are do to bring the historic value of sections of the city to everyone's attention as being worthy of note.

York Consortium for Conservation and Craftsmanship point out that the Plan acknowledges York as being a special city, valued for its history, archaeology and fine buildings. This inheritance owes much to the traditional crafts and conservation skills that are very much alive in the city today and without the businesses employing these crafts people the historic infrastructure could not be maintained and the city would lose some of its special character. They suggest these businesses are included within the development types which are acceptable in principle in the city centre (policy SS3) that would provide a vibrancy and richness to the mix of activities in the city and suggest craft studios could be accommodated within the York Central (ST5) site.

Several general respondents mention the number of vacant retail units

	<p>within the city centre that is suffering from out of town developments, whilst it is felt by some that too many cafes are replacing traditional retail shops in the centre of town. More cycle racks at appropriate locations should be considered whilst taxi boats and monorails were suggested as means to improved city centre transport links. Whilst better use of upper floors to retail units is seen as a means of improving an appropriate policy suggestion.</p>
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Policy SS4: York Central (ST5)			
Total respondents:	Support: 16	Objections: 46	Comments: 30
81 (plus 1 NDM)			(plus 1 NDM)
Key Issues Raised			
Support	<p>A number of comments support the principle of delivering development on this large brownfield site, including from York Central Partners, Arup on behalf of the York Central Partnership, GVA on behalf of the Homes and Communities Agency (HCA), Historic England, Highways England, Network Rail and Lichfield's on behalf of Hungate (York) Regeneration Ltd.</p> <p>There is support for ST5 from Arup on behalf of the York Central Partnership. GVA on behalf of the Homes and Communities Agency (HCA) is generally supportive of the intent of this policy and welcomes its inclusion within the Local Plan.</p> <p>Historic England gives support for the principle of development on this large brownfield site, as part of a wider development strategy designed to achieve the protection of key elements which contribute to the special historic character and setting of York. Support requirement for development within principles designed to: enhance the quality of the cultural area around National Railway Museum (NRM); create a distinctive new place; conserve and enhance the special character and/or appearance of the adjacent Central Historic Core Conservation Area/St Paul's Sq/Holgate Rd Conservation Area and maximise sustainable economic growth.</p> <p>Network Rail is pleased to note that the potential access to York Central from the 5 acre land has been removed from this iteration of the local plan. Highways England considers development principle (xii) to be satisfactory.</p> <p>Some of those writing in support of the scheme support the development proposals for York Central and the expansion of the National Railway Museum including the former railway works site. Support is given for this brownfield site being used for high density housing and employment. It should be sustainable given its location, especially in terms of transport. There were also several queries regarding the access points to the site, including more cycle and pedestrian paths and whether it could be a car free development.</p>		

<p>Objection</p>	<p>GVA on behalf of the Homes and Communities Agency (HCA) state that the York Central Partnership are now confident that the site can accommodate up to 2,500 dwellings and 100,000sqm of office uses alongside a variety of supporting uses including retail, leisure and hotel provision. The HCA would be grateful for amendments to be made to Policy SS4 to reflect this up-to-date quantum.</p> <p>GVA on behalf of the Homes and Communities Agency (HCA. Policy EC1 (Provision of Employment Land) lists the city's strategic employment sites, defining those as being over 5 hectares (ha). It then states that York Central's employment land area measures 3.33ha. In order to avoid confusion and potential challenge as the plan progresses, it is requested that the reference to the scale of strategic sites is amended or a clarification is made relating specifically to York Central.</p> <p>GVA on behalf of the Homes and Communities Agency (HCA) The policy should be amended so that the importance of an appropriate amount of retail development necessary to support the local community, both within and around the site, is recognised and weighs in favour of a future planning application. The policy should also be amended to clarify that similar requirements for sequential and impact assessments are not required for the other uses referred to in the policy, in line with the NPPF, where those uses are proposed within the city centre boundary. The policy should include an indicative floor space provision. Key Principle (i) should include retail and hotel amongst the range of uses. Alter key principle (ix) so that it reads <i>"Ensure provision of social infrastructure which meets the needs of York Central and, where feasible, the wider city communities including sports, leisure, health, education and community facilities and open space"</i>.</p> <p>Although supportive of the principle of development on this brownfield site, Historic England query the deliverability of the quantum of development proposed within the site's heritage context, both in terms of impact on the site's many heritage assets and also potential knock-on to the city centre. Suggests a lot more work is needed to demonstrate how 1,500 dwellings and 61,000 sqm of office floorspace can be created on the site in a manner which would also be compatible with the need to safeguard the significance of the numerous heritage assets in its vicinity and the other elements which contribute to the special historic character of the City. The risk of a development strategy focused on tall buildings and its impact on the historic skyline is also raised by a number of other respondents, including Shepherd Group and DPP Planning on behalf of Linden Homes, O'Neill Associates on behalf of Jorvik Homes and O'Neills Associates on behalf of Galtrees Garden Village Development Company</p> <p>A number of objections from Planning agents on behalf of house builders/landowners and the York and North Yorkshire Chamber of</p>
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Commerce, query ST5's assumed delivery. Concerns relate to:

- That there is considerable doubt about the viability and deliverability of the site and its lead-in time.
- Concern over the net developable area being less than 35ha.
- The over-reliance on housing delivery from York Central could undermine the potential for the Plan to provide sufficient land to accommodate projected housing need over the Plan period.

(York, North Yorkshire and East Riding LEP). Increased flexibility in approach to use of employment sites is welcome but there is a concern over the planned target of only 60000 sq m of B1a office space at York Central given the significantly higher figure in the EZ proposal.

Network Rail state that the policy wording with regard to sequential testing needs to be reconsidered to ensure that unnecessary obstacles do not obstruct achieving a mix of uses within the allocated area. The policy wording could be updated to reflect the change in rail priorities. Amend 4th bullet to read 'Rail uses associated with operational rationalisation and function and catering for HS2 and all other future rail capacity projects'. Concerned that principles x,xi and xii are seeking the same objective, are a reiteration of overarching policies in the plan and need to be built upon in this more detailed policy. The policy should be more proactive in supporting innovative design based solutions to sustainable transport objectives by favouring design consistent with achieving a low speed traffic environment, emphasising place making over vehicle movements and creating high quality walking and cycling links with the city centre and York Station . Paragraph 3.27 should be updated to 'general rail capacity schemes designed to improve and enhance all routes on the network affecting York' with the reference to York Leeds Harrogate deleted. The wording in relation to broadband should be clarified with the emphasis on the site developer facilitating broadband in those areas of the site that will support office and residential development.

The cumulative impact of the site on the city's already congested road network is seen as a significant threat, and the lack of detail regarding sustainable transport options inadequate. It is considered that this should be a car free living site. Amongst others, Friends of Holgate Garden is particularly concerned that the prospective route for access to the York Central site crosses the community garden, citing the loss of productive and creative gardening and loss of amenity space. They note further significant impacts including from additional traffic/pollution on local resident's health and quality of life. Schools and shops need to be provided with outdoor play space for children, teenagers and adults. Need for more affordable housing/social housing on ST5.

This site is a key space for increasing employment opportunities in York, York needs more high quality employment opportunities in the city centre and needs a mix of employment types not just tourism allowing creative industry to flourish and deliver on the UNESCO

	<p>Creative Cities Network promises. The railway carriage buildings could be converted for new uses and preserving the heritage of the city. The city needs a medium sized multifunctional venue. A mix of studio and office space with gallery/exhibition space and cafes would allow a cultural quarter to develop and compete with larger cities. Employment allocation should be 30% of the site. Make it York note the overall increase in requirement for employment uses, and specifically that relating to B1a Office uses is a very welcome addition. Others believe that allocating office space in the 'teardrop' York Central site is a waste of time and money as there are other office structures in York which have been unused for decades. Suggests leaving construction of business spaces until they are guaranteed to be used.</p>
<p>Comment</p>	<p>Arup on behalf of the York Central Partnership request that the reference to the scale of strategic sites (5ha) is amended or a clarification is made relating specifically to York Central which is 3.33ha to avoid confusion.</p> <p>Arup on behalf of the York Central Partnership and GVA on behalf of the Homes and Communities Agency (HCA) suggest it would be unduly prescriptive to refer to the sequential and impact assessments in relation to town centre uses on this site. It seems un-necessary to for broadband requirements to be stipulated in the policy framework for York Central. Suggest an alteration to ix, whilst York Central is an opportunity to meet local infrastructure needs, it must be allowed to succeed in its primary objective of delivering significant housing and employment space in a sustainable location and supported by infrastructure necessary to meet its own needs, alteration to policy suggested.</p> <p>GVA on behalf of the Homes and Communities Agency (HCA) suggest as a minimum, they would expect the development to include space for a food store and other retail uses necessary to support a major new residential community, an employment cluster and a national museum, the cumulative space of which is likely to exceed 2,500sqm.</p> <p>National Railway Museum welcomes and endorse points iii, and iv. of policy SS4 which supports the expansion of the museum, the creation of high public realm around the museum and improved connectivity with the rest of the city. Suggest an alteration to ix, whilst York Central is an opportunity to meet local infrastructure needs, it must be allowed to succeed in its primary objective of delivering significant housing and employment space in a sustainable location and supported by infrastructure necessary to meet its own needs, alteration to policy suggested.</p> <p>Highways England indicate that any further increase in site capacity will increase the traffic on the A64.</p> <p>Northern Power Grid indicate the potential need for network reinforcement for connections to this proposed development site to</p>

accommodate the additional load but the level of detail available in the plan is not sufficient to quantify the extent at this stage of development. EHV infrastructure reinforcement may be required for this site. This may have impacts on development timescales so it is advisable that as soon as developers have details of their developments location and electrical capacity requirements they submit an application for connection to Northern Power Grid so they can provide a quotation for the connection and details of any reinforcement and/or diversion works that may be required.

North Yorkshire County Council state the development of this site will provide new economic and residential uses and activity in the centre of the City in a location well connected to sustainable transport which will benefit from regeneration.

Nether Poppleton Parish Council indicate that this site has potential for a transport hub where a bus/train interchange might be possible. At present, many of York offices are being converted into flats so question whether offices are needed here. If they are, then other out-of-centre employment sites should be reduced. Shopping has changed its profile but this is not reflected in the Local Plan. An extension of St Peter's Quarter would be most suitable for this area. It could act as a template for the teardrop site.

Network Rail Supports, as part of the York Central Partnership, ARUP's letter which makes specific representations in relation to York Central. Support, in particular, their concern that development on brownfield land may not be viable if the requirement for housing and other policies cannot be more flexibly applied to brownfield sites. Note that the [5 acre] site has been show on the Proposals Map as a site of local interest to nature conservation. Recent biodiversity surveys at the site did not observe any rare or uncommon plant species. The site has previously been in railway use and is important operational land needed to safeguard the employment at the depot and rationalise the railway operations at the York Central Site. Clarification is sought on the reason for the site's designation. Land at the 5 acre site will soon be the subject of an application for a new track fan to facilitate better train access arrangements into the depot. The Council's response to a pre-application enquiry supported the principle of the development.

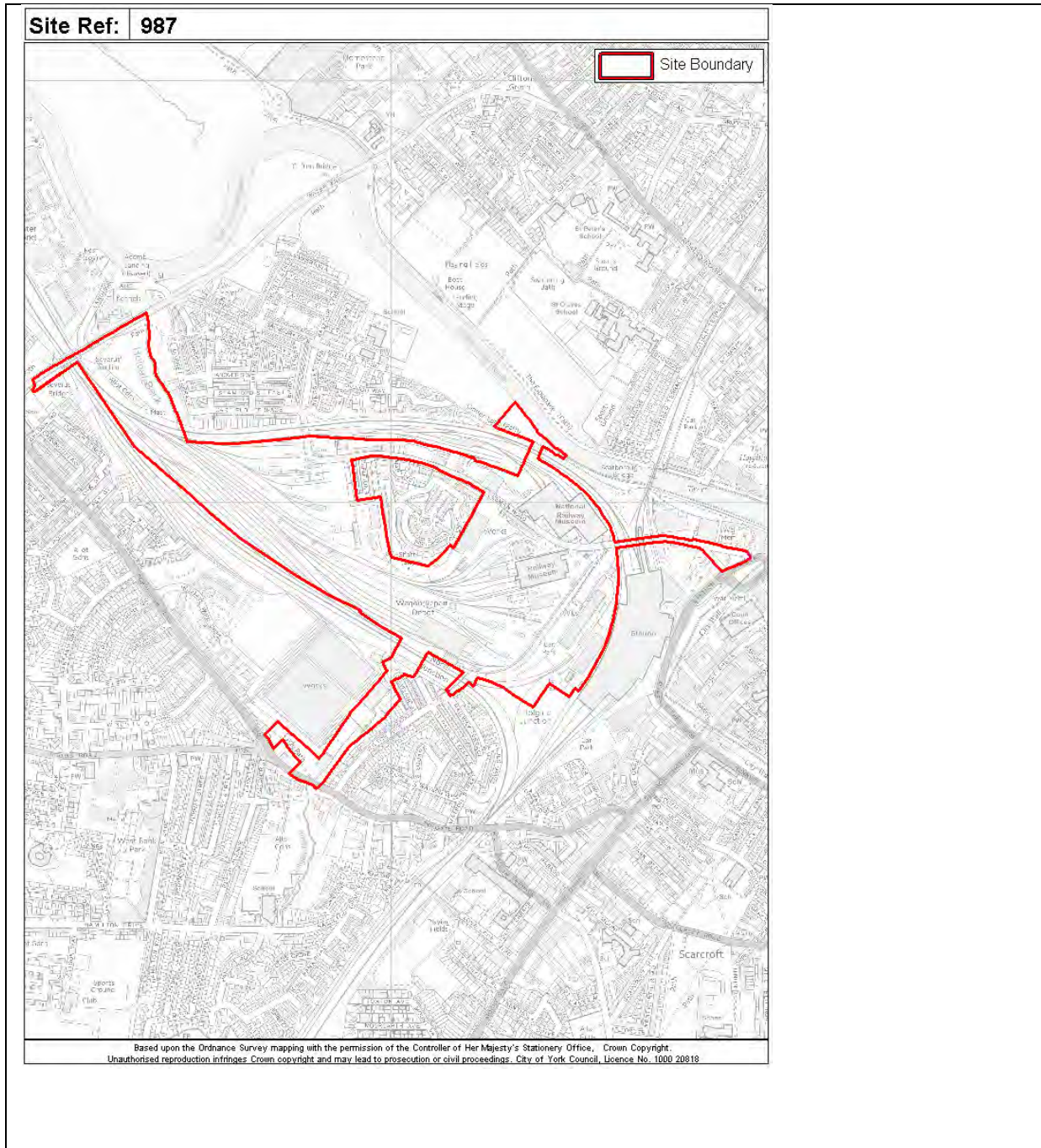
Specific issues include: what sort of mix/type of mix/type of housing is proposed, and will it meet York's needs, including an element of affordable; York Central Action. In favour of developing the site but ensure the development will benefit existing residents Residential uses, development should include a mix of housing, the greatest need is for affordable housing. Ideal location for smaller houses. Welcome the commitment to a mixed tenure development. what supporting development is proposed (shops, green space, doctors etc).; ESFRA - Supports development of infrastructure and reference to education. Would be helpful if plan could safeguard land for provision of new

schools to meet housing demand.

Conservation Areas Advisory Panel - Policy should note the site's historic context, namely its railway heritage. York Georgian Society state that the policy should note the site's historic context, namely its railway heritage. Keen to see York Central developed as long as the development does not hinder or compromise the future development of the railway infrastructure. It is important to preserve the Railway Institute and its related buildings as these are a valuable community asset. The built environment should be connected to the heritage of the railways. Space should be retained adjacent to the train station for future extension necessary to deliver HS2 (or HS3 / Northern Powerhouse Rail) connectivity.

ST5: Alternative boundary proposed

Boundary change submitted by the York Central Partnership following further discussion



SS5: Castle Gateway (ST20)			
Total respondents:	18	Support:	6
		Objections:	9
		Comments:	7
Key Issues Raised			
Support	<p>Historic England generally support the policy principles guiding regeneration, with the proviso that, reflecting the distinct areas either side of the Foss (Clifford's Tower/Eye of York and Piccadilly), each have its own policy framework.</p> <p>North Yorkshire County Council - the proposals to better link the Castle Museum / Clifford's Tower site with York's main shopping centre and</p>		

potentially support improvements on Piccadilly are welcomed as they further strengthen the city's role as a retail and commercial centre serving a wider hinterland.

York Green Party support much of this approach with the following provisos:

- we support the removal of the Castle car park. We believe the option of replacing it with an underground car park should be discounted immediately – apart from the expense, the likely difficulties regarding flooding and potential impact on the structural integrity of Clifford's Tower itself, the key reason is that retaining a car park entrance/exit on the Castle site will totally undermine the objective to remove the majority of through traffic from this area and enhance the setting of Clifford's Tower and other historic buildings in the area through creating a high quality pedestrian space. We would also strongly suggest that the plan doesn't specify that replacement car parking space should necessarily be provided at Castle Mills. Whilst this may turn out to be the case, specific assumptions about the most appropriate replacement parking shouldn't be made until a detailed review of all the city's off road parking capacity has been completed.
- The form and design of any building along the western bank of the Foss is crucial. The limitations on what is acceptable should be clearly defined from the outset.
 - Add the following *'The building should be highly legible and maximise opportunities for full and open (non-paying) public access to the river frontage (required at v) directly from the Castle site, facing both the river and the new civic open space; it should maximise views of the Foss from the Castle site, preserve the current view of Clifford's Tower from Piccadilly and facilitate an awareness of being between two rivers on the Castle site ; it should be no more than one storey high for a significant part of its length; and it's footprint should take up less than one third of the area between the Foss and the bottom of the Castle mound'*.
 - Replace ii) with *'Deliver a contemporary new car park if required to meet evidence based city centre parking needs, for example on the site of existing surface level parking at Castle Mills.'*
 - The principles should include some kind of definition of what is required on the Castle car park site. Add new principle *"Create a new city centre park on the former Castle car park, connecting this area with the Eye of York to provide a flexible*

	<p><i>civic space that includes green infrastructure, informal open space, more formal space for small and large events, reflects the heritage of the area and better connects the city centre to the Castle Museum”.</i></p> <p>Yorkshire Wildlife Trust generally support the overall concept of improving the area. Protected species e.g. Otters, will need to be considered if the banks of the River Foss become more open to the public. There may also be some possibilities of re-naturalising some of the concrete and metal reinforcement of the river banks in some places.</p> <p>General supports include:</p> <p>It is widely agreed that the current car park around the base of Cliffords Tower is visually unappealing and may not be the optimum use of space in such a historic area. Support the suggestions that the car park is relocated or put underground.</p>
<p>Objection</p>	<p>Nether and Upper Poppleton Parish Council/Poppleton Neighbourhood Plan Committee comment on the contradiction between the Plan’s aim to reduce car use in the city centre and this policy which includes plans for car park.</p> <p>York Georgian Society and Conservation Area Advisory Panel - policy needs extensive redrafting: should the plan establish such detailed principles when community consultation is actively underway?; policy content is in conflict with the outcomes and recommendations of Castle Car Park public inquiry, namely its reference to "(i) create a development opportunity for a contemporary new building of exemplary architecture alongside the western bank of the River Foss on the site of the existing Castle Car Park". Such a principle would be contrary to the outcome of the Public Inquiry held in 2002 and should not be included here; the whole of the Castle Gateway development site lies within the Central Historic Core Conservation Area - comment suggests that the recognition of this designation should be acknowledged as the first of the 'purposes(s) of the regeneration' by quoting the definition of the conservation area designation, viz: "<i>to conserve and enhance the character and appearance of the conservation area</i>". This would comply with the Inspector's recommendation at the end of the Public Inquiry in that " a site with such historic associations and heritage value...the historic environment should have been the over-riding consideraton in the formulation of the scheme." This should be included as a 'purpose of the regeneration'; the contents of the 2006 Castle Piccadilly Planning Brief do not appear to have been taken into account in this policy. Note other detailed text changes.</p> <p>Cllr Johnny Hayes - Concern about Clifford's Tower Motte. The space at</p>

	<p>the base of the four steps removed from green space land. Open space land cannot be apportioned, removed or its status altered without following the terms of the 1972 Local Government Act. Section 123 on disposal of land. It should be returned to open space land.</p> <p>Other objections include:</p> <ul style="list-style-type: none"> • Over-prescriptive wording, pre-emptive of masterplanning, including use of the term ‘development opportunity’; • Need for a car park should be established prior to planning its replacement. Note potential for underground car park space to flood; • Castle Car Park should be kept as open space. More should be made of the Castle's historic context including excavation of the car park and interpretation of remains. • Development on this site should face the Foss on Piccadilly and the current car park site. The river should be the focus of the area. A footbridge over the Foss should open up the site from Fossgate. Piccadilly should be developed to face the river and allow access to the water, enabling small rowing boats on the river or punting. Piccadilly should be developed to enable linking of the spaces along the Foss. • There should be a winter garden accessible all year with exhibition space, cafes, independent small shops and a medium sized venue - with a focus being cafe culture, family friendly not bars.
<p>Comment</p>	<p>Canal and River Trust welcomes the principles to enhance the public realm along the Ouse Riverside. Believe the document would be more precise if more guidance was provided on how it would be enhanced (i.e. Access).</p> <p>Other comments include:</p> <ul style="list-style-type: none"> • That the principle of a new building on the banks of the Foss has not specifically been flagged up as a wish through community engagement; • Tree planting on Piccadilly might be a good idea but there is no reason why it would be, in the absence of other consideration of redesign of Piccadilly as open space. • The Castle Gateway area could be an example to the rest of York. A place where pedestrians and cyclists are given priority and small-scale is prevalent.

	<ul style="list-style-type: none"> • design of any proposals should be in-keeping with the setting of heritage assets including Clifford's Tower and the Castle Museum. • lack of city centre bike parking puts people off cycling in and limits how / where they cycle in the centre. As such, is disappointed by the council's insistence on the need for the Castle Car Park. High density, covered, cycle parking with 24/7 CCTV would be better and would benefit businesses in the city centre (as opposed to out of town retailers) as more people feel comfortable cycling / leaving their bikes in the city centre.
ST20: Alternative boundary proposed	
No alternative boundary suggested.	

Policy SS6: British Sugar/Manor School (ST1)			
Total respondents:	Support: 5	Objections: 59	Comments: 15
73 (plus 1 NDM)		(plus 1 NDM)	(plus 1 NDM)
Key Issues Raised			
Support	<p>Rapleys LLP on behalf of British Sugar PLC support in principle the identification of the site as part of site ST1 for housing led redevelopment to deliver approximately 1,200 dwellings.</p> <p>Several other respondents also support the principle of residential development on ST1.</p> <p>Additional comments were made around the site having good access to the City without needing a car, support for the site if it is imaginatively designed, with a range of housing including social housing, improved cycle/footbridge would bring benefits, open space could also be provided to help meet existing deficits and provision and protection of the existing nature reserve.</p>		
Objection	<p>Rapleys LLP on behalf of British Sugar PLC proposed new wording for the policy. Criterion ii. Delete and surrounding communities - agreed that there is no requirement for local retail or healthcare facilities, Any specific reference to these must relate to the Manor School part of ST1. This should be clarified. Criterion iv. deleted reflecting the site historic use and social heritage. This is unclear and should be deleted. The existing landscape will be reprofiled as a result of the remediation work and whilst every effort has been made to ensure views towards the city centre are maintained where appropriate this as to be done inline with the engineering works. This should be made clearer in the policy. Criterion v. delete including existing landscaped areas. The existing landscape will be reprofiled as a result of the remediation works. This should be recognised accordingly. Para 3.37 delete the wording 'This may include phasing development around the site to correspond to the lifecycle of the species'. A buffer has been put in to ensure protection of</p>		

	<p>the SINC. The suggested wording regarding life cycle of bees and wasps should be deleted.</p> <p>Highways England suggest, adding the following to the list of key principles: 'Demonstrate that all transport issues have been addressed, in consultation with the Council and Highways England as necessary, to ensure that as many trips as possible are taken by sustainable travel modes and promote and facilitate modal shift from the car.'</p> <p>Rachael Maskell MP questioned the availability of the British Sugar site as there are issues with land contamination which may not be addressed within the time span of the Local Plan.</p> <p>There were many objections including one from Friends of Acomb Park to the site being extended which now includes the old Manor School playing fields, it was felt that open space deficit in Acomb will be made worse through this loss and the loss is not justified through evidence base.</p> <p>Many respondents commented that the area has a number of mature chestnut trees lining the road which should be preserved as they are rare for the York area and provide a habitat for wildlife. A tree preservation order should be placed on them immediately to prevent felling.</p> <p>Other major concerns relate to extra traffic onto already congested A59 and A1237 and the lack of a plan to alleviate congestion. Several people felt that the development should be put on hold till the Outer Ring Road is dualled. There were serious reservations about the new access road planned off Millfield Lane. The new road would cause the destruction of a natural border habitat that supports a range of wildlife. Request for improved public transport connections as public transport in the area is currently infrequent and unreliable. Would generally like to see more provisions for cyclists. Major road improvements should take place before housing developments.</p> <p>Additional concerns related to air and noise pollution, impacts on public health, lack of employment for those who will live in the new housing, no mention in the policy for the provision of nurseries, infant or junior schools or additional healthcare facilities.</p>
<p>Comment</p>	<p>Highways England state that it is likely that a development of this scale will require capacity enhancement on the A64 west of York, particularly if the cumulative impact of other sites around the A1237 is considered.</p> <p>Nether Poppleton Parish Council and Upper Poppleton Parish Council indicate that 500 houses should be completed on this site before any consideration is given to the opening of the ST2 Civil Service site. Access to the site should be with a dual carriage split entrance onto Boroughbridge Road. Concerned that access to site could be considered near level crossing on Millfield Lane. Should consult with</p>

	<p>Parish Council re bollard on Millfield Lane. Consideration should be given to an exit using a bridge across the Harrogate railway and linking to A19 or A1237 by new roads. Parking on double yellow lines needs to be addressed. Large trees and hedgerows on the site should be preserved. Provision should be made for adequate replacement of playing fields at the former Manor School and Former British Sugar Site cricket pitch. Concern about the noise from the railway for the new residents of this site. Local businesses which currently enjoy the ambience of a rural setting should be considered. Provision should be made for the elderly as well as starter homes for young people. Bungalows and the potential for sheltered housing is not mentioned in the policy. Garages should be big enough to fit modern cars and there should be off-street parking for 2-3 cars per house.</p> <p>York Green Party suggests that the site should be subject to the same standards as the nearby York Central in terms of requirement for affordable housing, sustainable building and traffic minimisation. Much of this seems to be missing from the current site principles. Amenity and recreational open space in the area for existing and new residents should also be protected. The potential for a tram/train/light rail link through this site to the railway station shouldn't be a long term possibility but an immediate strategic transport priority.</p> <p>Network Rail highlight that Millfield Lane [Level] Crossing continues to be a high risk crossing which is likely to see the number of trains increased in the short to medium term. Transport Assessments should assess likely vehicular and pedestrian movements over the crossing where the number of vehicle, cycle and pedestrian movements require improvements to the level crossing.</p> <p>Amec Foster Wheeler on behalf of National Grid highlight the proposed residential site is crossed by a National Grid high voltage electricity transmission overhead line. Potential developers of the sites should be aware that it is National Grid policy to retain its existing overhead lines in-situ. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.</p> <p>Other comments highlight the need for houses to be affordable at £100K mark and infrastructure such as roads, schools, shops and parking need to be considered. The SINC should be protected. The mental and physical benefits of trees and green spaces are important.</p>
ST1: Alternative boundary proposed	
No alternative boundary suggested	

SS7: Civil Service Sports Ground

Total respondents: 26	Support: 3	Objections: 20	Comments: 6
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(plus 1 NDM)		(plus 1 NDM)	(plus 1 NDM)
Key Issues Raised			
Support	<p>Planning Prospects Ltd on behalf of Miller Homes highlights that an extensive evidence base has been prepared over a number of years which supports the delivery of the site and indicates that there are no environmental impediments to the site's delivery.</p> <p>Historic England welcome the criterion that development should be set back from the A59 frontage and retain the mature trees in order to preserve the perception of openness. It is also highlighted that protecting land to the southern part of the site from development; would help preserve the historic character and setting of the City.</p> <p>Support for the site as it is accessible to city without needing a car.</p>		
Objection	<p>Upper Poppleton Parish Council, Nether Poppleton Parish Council and the Poppleton Neighbourhood Plan Committee highlight several key issues including that the Examiner for the Upper and Nether Poppleton Neighbourhood Plan indicated that this land was in the general extent of the Green Belt and therefore could not be allocated in the Neighbourhood Plan and the site should be assessed through the Local Plan process. It is a large Greenfield site and is grade 2 agricultural land. The presence of Grade 2 agricultural land is missing from the policy explanation. The former playing fields should be recommissioned. It is thought to be ironic that the Local Plan promotes healthy living but does not reinstate the playing pitches that were in place for 40 years on this site. Expansion of leisure and sporting facilities for Manor Academy should be considered for this site. This land is the last significant break in the landscape between the urban area of York and the villages of Upper and Nether Poppleton. The site acts as part of a green corridor and should only be used as a last resort for housing. Millfield Lane should not be used as access to the site. Vehicles would have to cross the level crossing. Increased traffic past the school will increase problems for local bus service. The increase on an already arterial road of potentially 3500 cars is not welcomed by residents. It is suggested that commenting on the availability of the Park and Ride as an alternative to car usage is not accurate as the services do not run after 7pm. Manor Academy is already at capacity. The Local Plan does not provide for new primary school on British Sugar site or this site. There will be a big increase in traffic to travel to nearest primary school 2 miles away. Air quality will be an issue due to standing traffic which will increase if this site is developed.</p> <p>York Green Party are very concerned by the cumulative impact on congestion this development will have in conjunction with the British Sugar site (ST1).</p> <p>A significant factor for those objecting to development of this site is congestion, due to the site's close proximity to the already highly congested northwest portion of the northern ring road. It was highlighted that the road infrastructure should be improved before houses are</p>		

	<p>developed. Other common concerns raised in objecting to the site's development include; loss of Green Belt with a suggestion that this site plays an important Green Belt function; insufficient services and amenities to support new development (lack of education provision/nursery space/healthcare); loss of sports facilities and open space, the site should be retained to provide recreational/sports facilities for which there is a shortfall in this area; health issues will arise from increased pollution from standing traffic; concern over the cumulative effect of this site and the British Sugar Site (ST1), each site should not be looked at in isolation. Valuable agricultural land should be preserved, it is not rough grazing land as suggested. Disagreement with the number of employment opportunities stated as a way of justifying so many houses.</p>
<p>Comment</p>	<p>Planning Prospects Ltd on behalf of Miller Homes indicates that the site should be referred to as "the former" Civil Service Sports Ground and the site also includes adjoining land fronting to Millfield Lane and adjacent Manor School. In response to a number of points set out in Policy SS7 and the explanation section of the site's assessment at paragraphs 3.38, 3.39 and 3.40 Planning Prospects Ltd on behalf of Miller Homes would like to highlight that: 1) the site should be referred to as the former Civil Service Sports Ground and Adjoining Land. 2) Mention is made of the need to cater for additional school capacity as a result of the development and this can be judged relative to capacity within existing schools at the time of determination of a planning application. 3).Access is possible to both Millfield Lane and Boroughbridge Road however there is a strong desire not to create a through route for motor vehicles.</p> <p>Upper Poppleton Parish Council, Nether Poppleton Parish Council and the Poppleton Neighbourhood Plan Committee highlights the policy only stipulates mixed housing, but it is felt that that policy should also consider the need for affordable housing addressing needs for smaller family homes and bungalows/sheltered housing. Development of this site will increase the use of the local amenities within Poppleton and the City. It is considered that a buffer zone should be established between the site and Manor Academy as set out in the Poppleton Neighbourhood Plan. There are significant trees, hedgerows and shrubs within and surrounding the site. The external hedge boundary acts as a buffer and should be retained.</p> <p>Network Rail highlight that Millfield Lane [Level] Crossing continues to be a high risk crossing which is likely to see the number of trains increased in the short to medium term. Transport Assessments should assess likely vehicular and pedestrian movements over the crossing where the number of vehicle, cycle and pedestrian movements require improvements to the level crossing.</p> <p>Public transport seems ineffective at reducing congestion near ST2, could a parallel route along the railway or reconfiguration of the</p>

	<p>Harrogate-York line being used for metro type tram system instead of heavy rolling stock?</p> <p>Other comments highlight the need for houses to be affordable at £100K mark and infrastructure such as roads, schools, shops and parking need to be considered.</p>
ST2: Alternative boundary proposed	
No alternative boundary is suggested	

SS8: Land adjacent to Hull Road (ST4)			
Total respondents: 18		Support: 4	
Objections: 10		Comments: 5	
Key Issues Raised			
Support	<p>Historic England support the principle of development in this location, although preference given to use of the site as an allocation to meet the future needs of the University of York, thereby enabling a reduction in ST27 to a scale less likely to harm the special character and setting of the city.</p> <p>Historic England also welcomes the inclusion of the development principle relating to the need to protect important views and that the site is designed appropriately in relation to its gradient.</p> <p>Comments from members of the public recognise that this development will supply much needed housing in this area and consider it ideally placed for public transport and local amenities.</p> <p>Persimmon supports the allocation of this residential development.</p>		
Objection	<p>Highways England state that a criterion identical to xii) in Policy SS4 is added (transport issues).</p> <p>Fulford Parish Council thinks the site should be deleted and kept permanently open for the following reasons:</p> <ul style="list-style-type: none"> • This area of the city is being urbanised. • The presence of the University is being used to justify further development of open land in this area including ST4 and ST27, ignoring that these locations were shown as protected buffer areas by the Heslington East Masterplan. • Site forms part of Kimberlow Hill (York Moraine) which is a very important landscape feature and is of significance in the history of York. <p>Persimmon (landowner) considers that the site has capacity for 240 dwellings rather than 211.</p>		

	<p>York Ramblers highlighted that this site crosses an outer urban footpath link from Hopgrove to Escrick. As such would appreciate maintaining a green way over Kimberlow Hill, rather than a path along the edge of a carriage way.</p> <p>Several individuals made comments relating to the green space/landscape/wildlife in the area:</p> <ul style="list-style-type: none"> • The site is not suitable for 211 houses as the fields form part of the landscape setting that was required for the new campus planning agreement in order to protect the character and setting of the city and surrounding area. • If homes are built half way up Kimberlow Hill the residents' cats will play havoc with wildlife/ground nesting birds. • More green space should be made available. • A member of public states that Field Lane is already busy and gets congested at peak times and would be better to have access to the settlement via the P&R.
Comment	<p>The National Grid identifies that this site is crossed by a National Grid high voltage electricity transmission overhead line. It is National Grid policy to retain its existing overhead lines in-situ. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.</p> <p>The Northern Power grid recognises that there may be potential need for HV infrastructure reinforcement for connections to this site to accommodate the additional load.</p> <p>A ward councillor highlights that:</p> <ul style="list-style-type: none"> • Any development of the ST4 site should aim to maintain a strong green corridor (buffer zone) between development and existing housing to mitigate against visual and noise impact and to ensure that main arterial route maintains a green wedge. • ST4 site has a triangular wedge, bordered by Field Lane to the west and Hull Road to the north - this could be designated as a required green space. • Field Lane traffic will need re-assessment as anecdotal evidence says that car speed and volume along this route is rapidly increasing.
ST4: Alternative boundary proposed	
<p>No Alternative Boundary Suggested. Only alternative development quantum of 240 homes</p>	

SS9: Land east of Metcalfe Lane (ST7)

Total respondents: 34 | Support: 8 | Objections: 19 | Comments: 15

Key Issues Raised

<p>Support</p>	<p>PB Planning on behalf of TW Fields support the development of a garden village in this location. Technical evidence undertaken for a new village in this location does not present any constraints that would preclude development. The site is available, suitable and deliverable although amended boundaries are proposed. Evidence base referred to includes landscape assessment, archaeological and built heritage statement, Transport assessment, ecology assessment, flood risk and drainage. Ecology assessment identified that there are a number ecological constraints but none that would preclude the development of the site.</p> <p>Several developers support the principle of a garden village in this location, although they support alternative boundary with amendments to policy. In addition it was felt that it appears more thought has gone into the planning of landscaping and blending into the surroundings with minimal disruption to existing properties nearby, it now looks like a natural extension the area. This is to be welcomed however the addition of a road linking the site onto Stockton Lane, even if only for use by public transport, would ease traffic flow in and out of the proposed routes and help residents to access the A64, A1237 and park and ride sites more easily.</p>
<p>Objection</p>	<p>PB Planning on behalf of TW Fields gives an ST7 alternative. A larger site boundary is proposed to deliver 975 homes (as per Officer recommendation in July 2017). This site would be a sub-urban garden village of 43.54 ha (70% developable area - 30.47ha net). Site density would be 32 dph. Development to commence 2019/20 following planning permission. Build out rate of least 90 dwellings per annum with the potential to develop 120 dwellings per annum (3 outlets). 0.43 ha of land would be provided for a local centre and 10.31 ha provided for public open space. Land for a primary school (0.59ha) and playing field (1.32ha) would be provided (1.91 ha total). The site would be by landscape-led masterplanning, including protection for Millennium Way and views of Minster. Three access points are proposed: north, south and Bad Bargain Lane. Evidence base undertaken for the site states that there are no constraints that would preclude development. Evidence base referred to includes landscape assessment, archaeological and built heritage statement, Transport assessment, ecology assessment, flood risk and drainage. Ecology assessment identified that there are a number ecological constraints but none that would preclude the development of the site.</p> <p>PB Planning on behalf of TW Fields gives a second ST7 alternative. A larger site boundary is proposed to deliver 1225 homes. This site would be a sub-urban garden village of 57.27 ha (70% developable area - 40.1 ha net). Site density would be 32 dph. Development to commence 2019/20 following planning permission. Build out rate of least 90 dwellings per annum with the potential to develop 120 dwellings per annum (3 outlets). 0.43 ha of land would be provided for a local centre and 14.83 ha provided for public</p>

openspace. Land for a primary school (0.59ha) and playing field (1.32ha) would be provided (1.91 ha total). The site would be by landscape-led masterplanning, including protection for Millennium Way and views of Minster. Three access points are proposed: north, south and Bad Bargain Lane. Evidence base undertaken for the site states that there are no constraints that would preclude development. Evidence base referred to includes landscape assessment, archaeological and built heritage statement, Transport assessment, ecology assessment, flood risk and drainage. Ecology assessment identified that there are a number ecological constraints but none that would preclude the development of the site.

Highways England suggests that the first sentence in key principle (v) needs to be modified to 'Demonstrate that all transport issues have been addressed, in consultation with the Council and Highways England as necessary...'

Historic England state the allocation will harm a number of key elements identified in the Heritage Topic Paper as being of importance to the special character and setting of the City: would reduce the gap between the A64 and the edge of the built up area to just 575 m at its narrowest point, impacting on key views and a large encroachment into open countryside; a new settlement so close to the existing urban edge would appear out of keeping with York's historic pattern of development, harming this element of its character. Development should be pulled away from the ring road - the most appropriate approach may be for some limited development on the eastern edge of the City, of a scale which does not harm the scale or compact nature of the City. Other respondents including Turley representing Gallagher Estates also suggests that development at ST7 will result in encroachment into the rural landscape at the edge of York. It will have some impact on the rural setting of the town and on key views from the A64 towards the historic core.

Additional objections include changes to the boundary and how this will affect access. A general concern over inadequate access to the site, negative effect on the SSSI if a new road is constructed on Murton Way. The green wedge should not be reduced to green corridors and small spaces. Concern over the loss of Green Belt and habitats for wildlife, lack of infrastructure and pressure on existing infrastructure, lack of medical facilities, lack of schools and concern over the roads getting busier, no provision is suggested for people accessing by foot, cycle or horseback.

Johnson Mowat on behalf of Redrow Homes and Trustees Object to criterion iii) of Policy GI6 and further land beyond the boundaries of strategic site. It is suggested that there is no justification for this. Request does not sit well when land is being retained as green belt. Further detail on the extent of the developer contributions is

required.

Johnson Mowat on behalf of Taylor Wimpey seeks alterations to reflect the wider role the school will perform. Early engagement is sought to address the primary and secondary requirements; there may be viability issues associated with the developer building the school. There is also no location shown on the proposals map for a secondary school. There maybe viability issues associated with the developer building the school at their own cost. The current ST7 boundary creates a remote development served off highly costly access roads. It is divorced from the existing settlement making it more expensive to develop, restricts the viability of on-site facilities and makes walking and cycling trips less likely given the routes back into the existing community areas. The target of 846 dpa is significantly below what is sustainably achievable in the northern and southern sectors of land. Currently the scale of development makes facilities difficult to achieve. If numbers were increased, it would increase attractiveness and deliverability of facilities and infrastructure. Do not support the new green wedge to west as it serves no purpose and does not perform green belt functions. This area need to be designated to ensure that in the quality of the land and its use are maintained in the long-term. Object to the footpath requiring 50m wide buffer. It is considered that the masterplan can achieve green corridors through alternative sound advice. Alternative ST7 boundary supported. An extension to the north towards Stockton Lane is supported. The alternative site size is 46.3 ha with direct access onto Stockton Lane. Circa 750 dwellings could be supported. Considered suitable, deliverable and viable. A Masterplanning document to support Land off Stockton Lane is attached setting out access principles, sustainability and integration, opportunities and constraints, green belt analysis and masterplan.

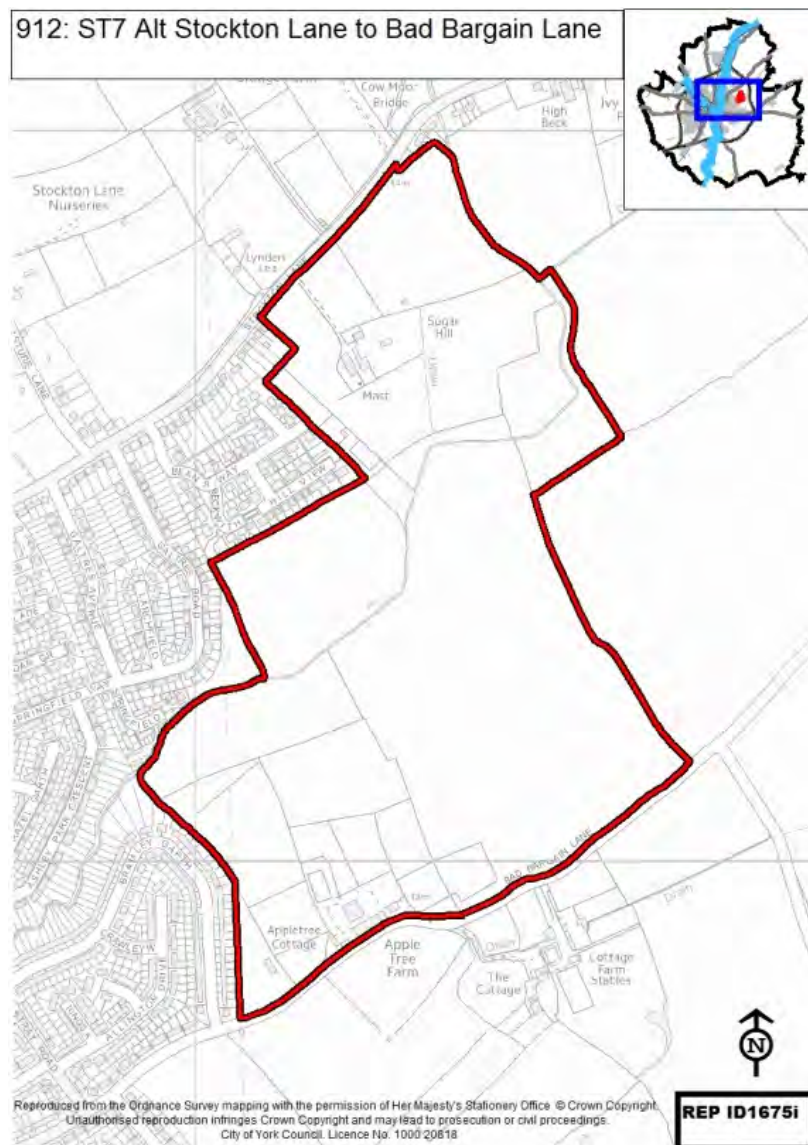
Persimmon Homes Ltd propose an alternative boundary. It is proposed that the boundaries of ST7 should revert to the development boundaries put forward by the Council in its Publication Draft Proposals Plan Consultation Draft October 2014 Local Plan for the northern part of ST7. The proposed western boundary would sit 70-250m from the existing urban edge. Concern that this buffer area would become ill-managed and overgrown. There should only be a gap if there is a technical reason. Northern boundary is 170m south of Stockton Lane, divorcing a development from its main road access introduces a number of problems. It would be more efficient to use the land fronting Stockton Lane, the allocation should be extended northwards. Eastern boundary - the 2014 Publication Draft boundary should be used. The old Foss Beck is a strong boundary. The 2017 Reg 18 boundary is 34.5ha and allow for an estimated 845 dwellings in the short -medium term. The proposed new boundaries would increase the site size to 43.8ha and 1,052 dwellings in the short - medium term.
Barton Wilmore on Behalf of Barratt and David Wilson Homes

	<p>indicate that the Council's decision to decline to accept the higher housing figure [of 953 dpa], and progress with a OAN of 867 dwellings per annum has an adverse impact their Clients' land interests, as three sites were to be either increased in capacity (ST7 – Metcalfe Lane, Osbaldwick and ST14 – North of Clifton Moor), or in the case of site reference SF10 (Riverside Gardens, Elvington), introduced as a new housing allocation, on the basis that the OAN was to be increased to 953 dwellings per annum have not been carried forward into the Pre-Publication version of the Plan.</p>
<p>Comment</p>	<p>Highways England notes that the second sentence in key principle (v) states that the cumulative impact of sites should be addressed. However, it does not indicate how this should be done. A development of this scale may require capacity enhancement on the highway network, particularly if the cumulative impact with other sites in the area is considered. Para. 3.45 provides the necessary reference to a transport assessment which should address the impact of the development on the Hopgrove roundabout and Grimston Bar junctions on the A64.</p> <p>Murton Parish Council is concerned about the impact on Murton in terms of the relationship between the City and Murton Village. The gap of 750m is not a 'reasonable gap'; this should be significantly increased. Concern for the Parish Council that the proposed development will mean an increase of traffic through Murton. The existing public transport serving the area is inadequate.</p> <p>York Green Party indicates there is no mention of the importance of flood mitigation measures in the site principles and an additional principle to this effect should be added.</p> <p>York Environment Forum suggests that this isolated site is too small to provide a sustainable settlement 'garden village'. Recommends size of development is increased so it can become a stand-alone community or be designated an "urban extension site" as separation from existing built up area is minimal.</p> <p>National Grid highlight the proposed residential site is crossed by a National Grid high voltage electricity transmission overhead line. Potential developers of the sites should be aware that it is National Grid policy to retain its existing overhead lines in-situ. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.</p> <p>Additional comments include: major investment to local road network must be carried out before any building work is started. All local utilities will need to be increased to accommodate the development. Should take into account requirements for new schools in location, size, characteristics, and land for expansion. Issue raised by Johnson Mowat representing Taylor Wimpy over the financial implications, CIL and Viability on a site specific basis.</p>

ST7: Alternative boundary proposed

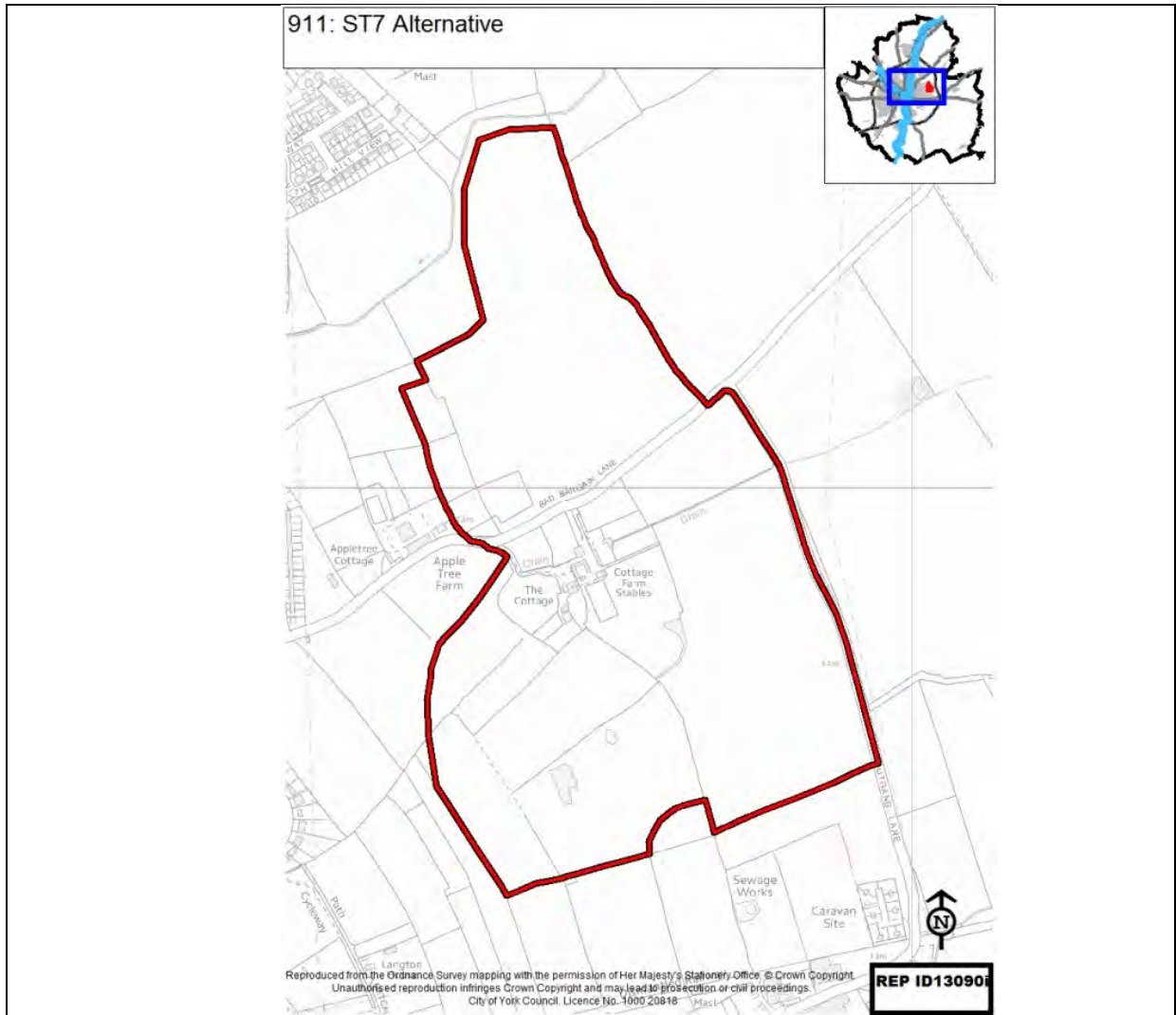
Johnson Mowat on behalf of Taylor Wimpey

Alternative ST7 boundary submitted featuring an extension to the north towards Stockton Lane. The alternative site size is 46.3 ha with direct access onto Stockton Lane. Circa 750 dwellings could be supported. Considered suitable, deliverable and viable. A Masterplanning document to support Land off Stockton Lane is attached setting out access principles, sustainability and integration, opportunities and constraints, green belt analysis and masterplan.



PB Planning obo TW Fields

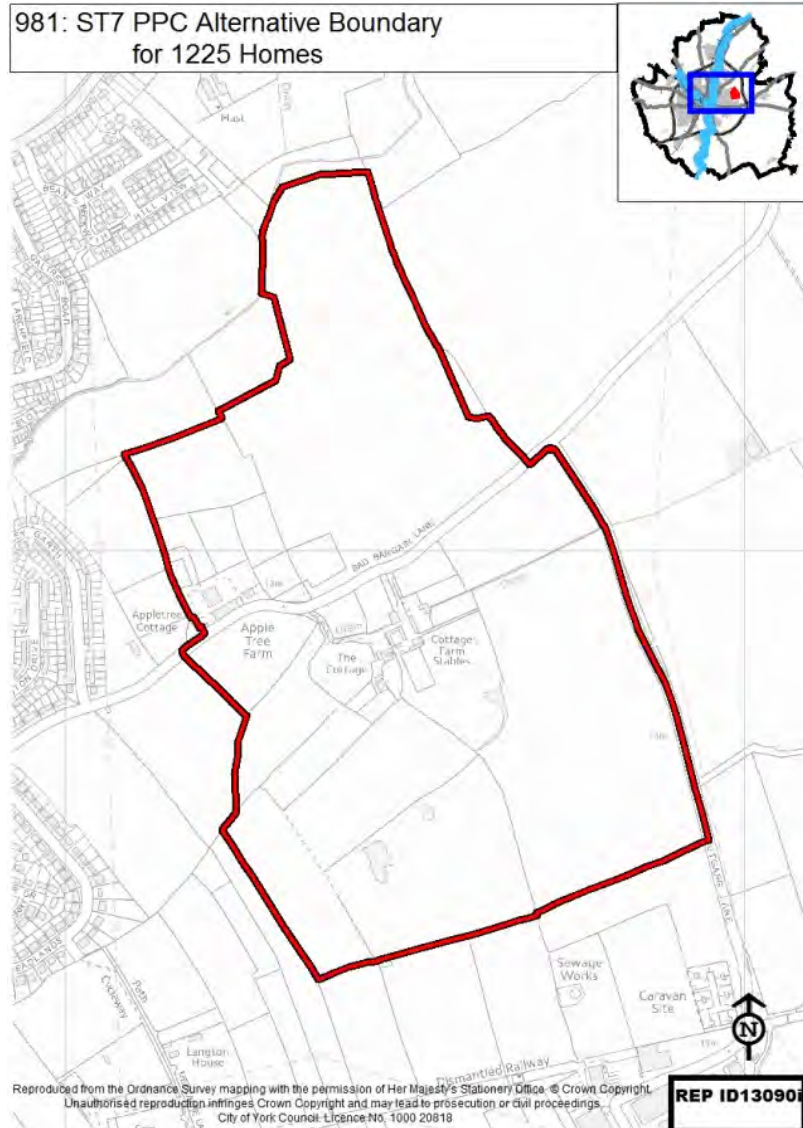
ST7 alternative (1). A larger site boundary is proposed to deliver 975 homes (re-submission). This site would be a sub-urban garden village of 43.54 ha (70% developable area - 30.47 ha net). Site density would be 32 dph. Development to commence 2019/20 following planning permission. Build out rate of least 90 dwellings per annum with the potential to develop 120 dwellings per annum (3 outlets). 0.43 ha of land would be provided for a local centre and 10.31 ha provided for public openspace. Land for a primary school (0.59ha) and playing field (1.32ha) would be provided (1.91 ha total). The site would be by landscape-led masterplanning, including protection for Millenium Way and views of Minster. Three access points are proposed: north, south and Bad Bargain Lane. Evidence base undertaken for the site states that there are no constraints that would preclude development. Evidence base referred to (not attached) includes landscape assessment, archaeological and built heritage statement, Transport assessment, ecology assessment, flood risk and drainage. Ecology assessment identified that there are a number ecological constraints but none that would preclude the development of the site.



PB Planning obo TW Fields

ST7 alternative (2). A larger site boundary is proposed to deliver 1225 homes. This site would be a sub-urban garden village of 57.27 ha (70% developable area - 40.1 ha net). Site density would be 32 dph. Development to commence 2019/20 following planning permission. Build out rate of least 90 dwellings per annum with the potential to develop 120 dwellings per annum (3 outlets). 0.43 ha of land would be provided for a local centre and 14.83 ha provided for public openspace. Land for a primary school (0.59ha) and playing field (1.32ha) would be provided (1.91 ha total). The site would be by landscape-led masterplanning, including protection for Millenium Way and views of Minster. Three access points are proposed: north, south and Bad Bargain Lane. Evidence base undertaken for the site states that there are no constraints that would preclude development. Evidence base referred to (not attached) includes landscape assessment, archaeological and built heritage

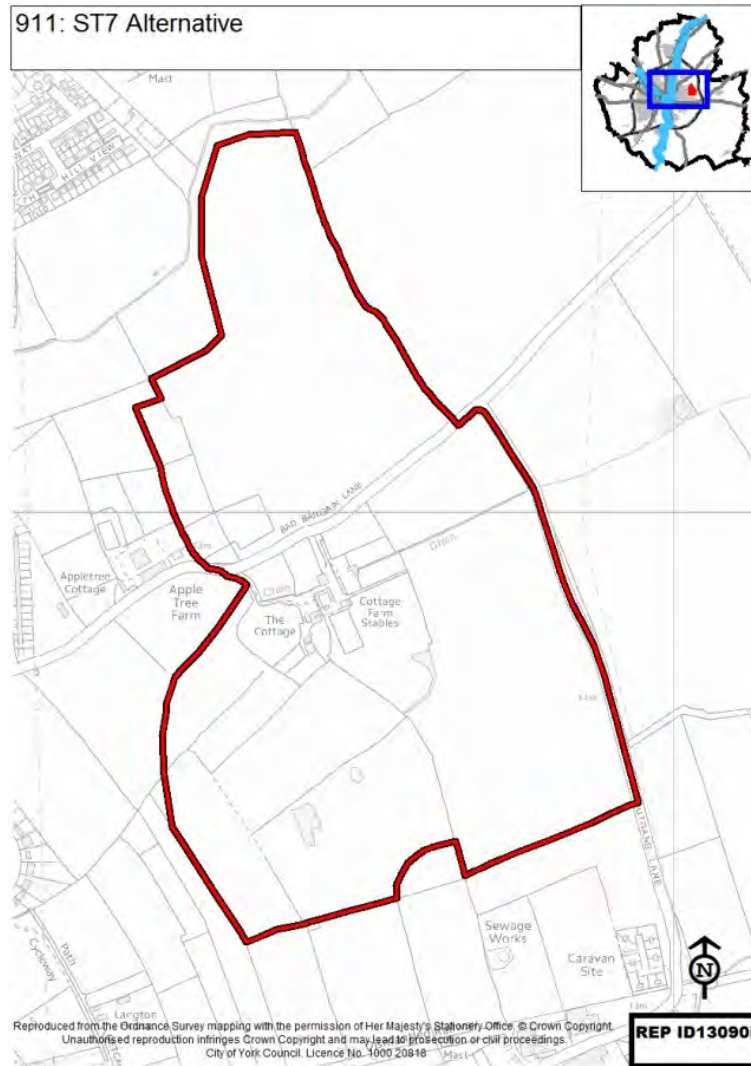
statement, Transport assessment, ecology assessment, flood risk and drainage. Ecology assessment identified that there are a number ecological constraints but none that would preclude the development of the site.



Persimmon Homes (Yorkshire) Ltd

It is proposed that the boundaries of ST7 should revert to the development boundaries put forward by the Council in its Publication Draft Proposals Plan Consultation Draft October 2014 Local Plan for the northern part of ST7. The proposed western boundary would sit 70-250m from the existing urban edge. Concern that this buffer area would become ill-managed and overgrown. There should only be a gap if there is a technical reason. Northern boundary is 170m south of Stockton Lane, divorcing a development from its main road access introduces a

number of problems. It would be more efficient to use the land fronting Stockton Lane, the allocation should be extended northwards. Eastern boundary - the 2014 Publication Draft boundary should be used. The old Foss Beck is a strong boundary. The 2017 Reg 18 boundary is 34.5ha and allow for an estimated 845 dwellings in the short -medium term. The proposed new boundaries would increase the site size to 43.8ha and 1,052 dwellings in the short - medium term.



SS10: Land north of Monks Cross (ST8)			
Total respondents: 38	Support: 5	Objections: 21	Comments: 15
Key Issues Raised			
Support	Allocation supported in principle by landowners/ developers (Redrow/Barratt/David Wilson) confirming a willing landowner.		
	Developers support the potential use of land to the east of Monks Cross		

	<p>Link Road to deliver additional open space and ecological mitigation to ensure that the Council's identified dwelling quantum can be delivered in full, whilst also providing a number of additional benefits to the area. General comments were received which support large development within the ring road and this site in principle.</p>
<p>Objection</p>	<p>Highways England suggests that the first sentence in key principle (x) needs to be modified to 'Demonstrate that all transport issues have been addressed, in consultation with the Council and Highways England as necessary...'</p> <p>Highways England also states that the explanatory paragraphs contain no reference to the Transport Assessment needed to support this key principle.</p> <p>Historic England consider that the allocation seems likely to harm a number of key elements which contribute to the special character and setting of the City (see full representation for details)</p> <p>Members of the public state the following:</p> <ul style="list-style-type: none"> • Local infrastructure cannot support development of this size (roads, drainage, schools, doctors etc); • Development will worsen congestion on the A1237- tampering with the nearby roundabouts on the outer ring road will not improve things. • Site is not suitable for development as there is already congestion problems nearby creating air pollution and health problems; • Site is green belt; • Object to site as doesn't adjoin Huntingdon so is not an urban extension. More logical to provide extension rather than island of development. • The boundary should be amended to make efficient use of the land currently identified in the gap. • Do not accept conclusion of SA that this site is most appropriate option; consider alternative boundary incorporating land to the north and west more sustainable <p>Gallagher Estates state that the development would be highly visible from a number of the approaches to York from the surrounding area and the proposed green wedge would result in a poor relationship between the new housing and existing settlement edge.</p> <p>Landowners Redrow and Linden Homes suggest a boundary change to include land to north of North Lane. Expanded site should deliver an additional 400 homes which could:</p> <ul style="list-style-type: none"> - assist in the provision of a primary school, - provide for a more open 'green' design, - assist in delivering community facilities, - assist in providing c100 more affordable homes.

	<p>In addition, the landowners object to Policy SS10 for the following reasons:</p> <ul style="list-style-type: none"> - defined housing mix has no regard to 'local demand' - will commission a site specific housing market assessment as advised; - green wedge to west of site - fulfils no green belt purpose and would be difficult to manage/farm. If retained, should be designated 'green wedge' rather than green belt, which would allow wider range of uses; - text should more clearly define need to protect existing features of ecological value and enhance biodiversity within specific areas of the site; - open space provision should be partially accommodated in the western green wedge; - reference should be made to adjacent employment/retail - further retail provision on site should not be prescribed by policy; - text should clarify that the primary school would be the focus for wider community use, rather than a separate facility; - viability issues re provision of school - to be discussed; <p>cumulative traffic impacts - Council needs to be clearer on what is expected of this and other named developments, by way of highway improvements, timings and costs; re cycle links - this to be achieved via Monks Cross Link Road.</p>
<p>Comment</p>	<p>Huntington PC state that:</p> <ul style="list-style-type: none"> • The percentage of social housing at this site needs to be increased and type of housing needs to be stipulated; • If the Local Plan could designate a particular site in the green belt as a development for social housing, it would lower the value of the land enough for a housing association or the council to purchase it for the sole use of social housing; • The road infrastructure for this development will need to be upgraded to cope with traffic exiting onto Monks Cross Link Road. • Drainage and surface water will require special attention as most of Huntington has clay soil. • A medical facility or an Elderly Care Facility rather than a community centre would be preferable, for any section 106/CIL contribution, as Huntington has a high proportion of elderly residents. <p>Northern Power Grid identifies potential need for HV infrastructure reinforcement for connections to this proposed development site to accommodate the additional load.</p> <p>Members of the public state the following:</p> <ul style="list-style-type: none"> • Unclear why the Council has not amended the boundary to take into consideration comments made by Historic England despite land

being available with willing landowners.

- The site could be useful for employment at Monks Cross.
- Site is regarded as an urban extension. Green wedge to west could be narrowed and still give adequate separation from Huntington. Questions how open space will be managed. If agricultural, will not be accessible to public. The provision of OS8 will not be accessible to residents.
- Site should be increased to include land south of ring road (between Strensall Road and Monks Cross Link Road) to meet housing demand.
- Traffic calming measures should not be used on Monks Cross Link Road. This road needs to be maintained as a high capacity part of the transport network and key access point from the Northern A1237 Ring Road into the commercial and leisure site at Monks Cross (including the future Community Stadium). Provision should be retained for the link road to be expanded for dual carriageway standard as a spur from the outer ring road aiding traffic to avoid the frequently congested junction with the A64 at the Hopgrove roundabout (ref policy T4).

Redrow own majority of site and highlight the following concerns:

- Reduced scale of the allocation;
- Inconsistencies in relation to 'strategic green space' and 'new green wedge' immediately to west of ST8 – the masterplan identifies the primary school and playing fields in the green wedge to the west;
- Numerous policies in the Local Plan may have financial implications but information on whether or not they apply and to what extent is not outlined in the Plan.
- Unclear on the timing of strategic highway improvements and educational facility upgrades and to what level individual developments are expected to contribute.
- Viability Appraisal based upon a standard S106 cost of £3,300 per dwelling but no mention is made as to whether or not education and highways is included or excluded from this sum.
- Site ST8 will not be viable with the suggested CIL and to have the site specific; education, community facilities, public transport upgrades and wider strategic higher network upgrades sat outside the CIL as additional items.
- Housing mix on the site, do not agree with policy H3 - will commission a site specific housing market assessment.
- Points 2 and 3 re strategic landscape buffer could be merged.
- Agree with concept of protecting and enhancing biodiversity but policy could focus on protecting existing features and enhancing biodiversity in green wedge.
- Support principle of new open space but should be provided in green wedge.
- Site near Monks Cross so no lack of retail facilities. Community

	<p>facilities should be focussed around the school in the green wedge. The size of the development would only generate the need for a single entry primary school - this needs to be stated in text.</p> <ul style="list-style-type: none">• Accept that there should be no access from site to A1237.• Policy needs to be clearer about the cumulative traffic impact and the implications for highways improvements, timings and costs.• Site being master planned such that an internal loop will facilitate the hopper bus service to monks cross park and ride and beyond. Masterplan includes cycle links to wider area but the manner in which the site is detached from the urban area runs contrary to the aims of better integrating the site with existing nearby neighbourhoods. <p>Barratt Homes and David Wilson Homes also submit a series of individual letters promoting each site including ST8 to be read in parallel to their overarching representations.</p>
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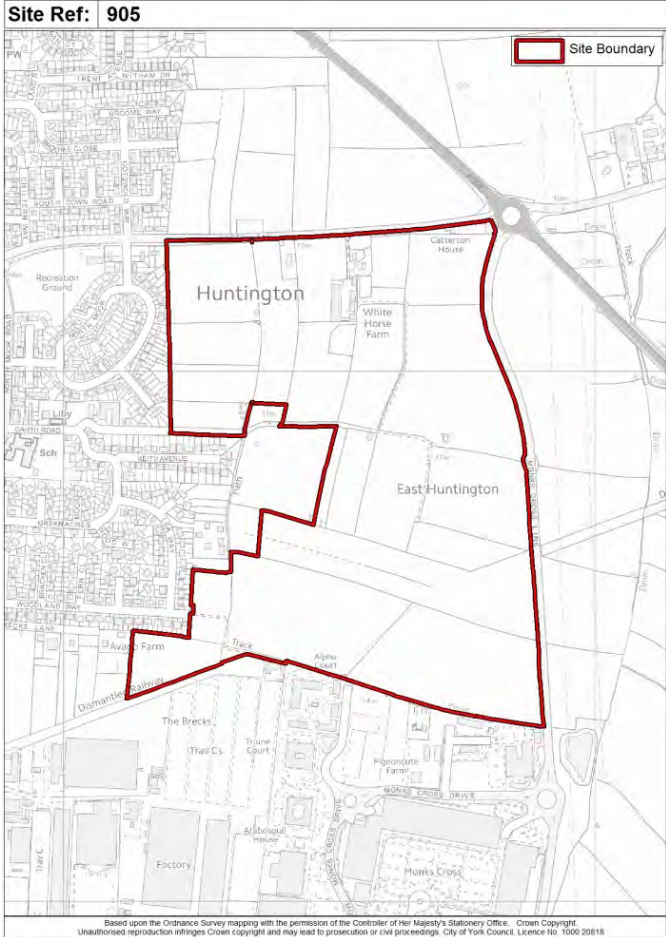
ST8: Alternative boundary proposed

4 boundary amendments submitted:

Johnson Mowat obo Private Landowners

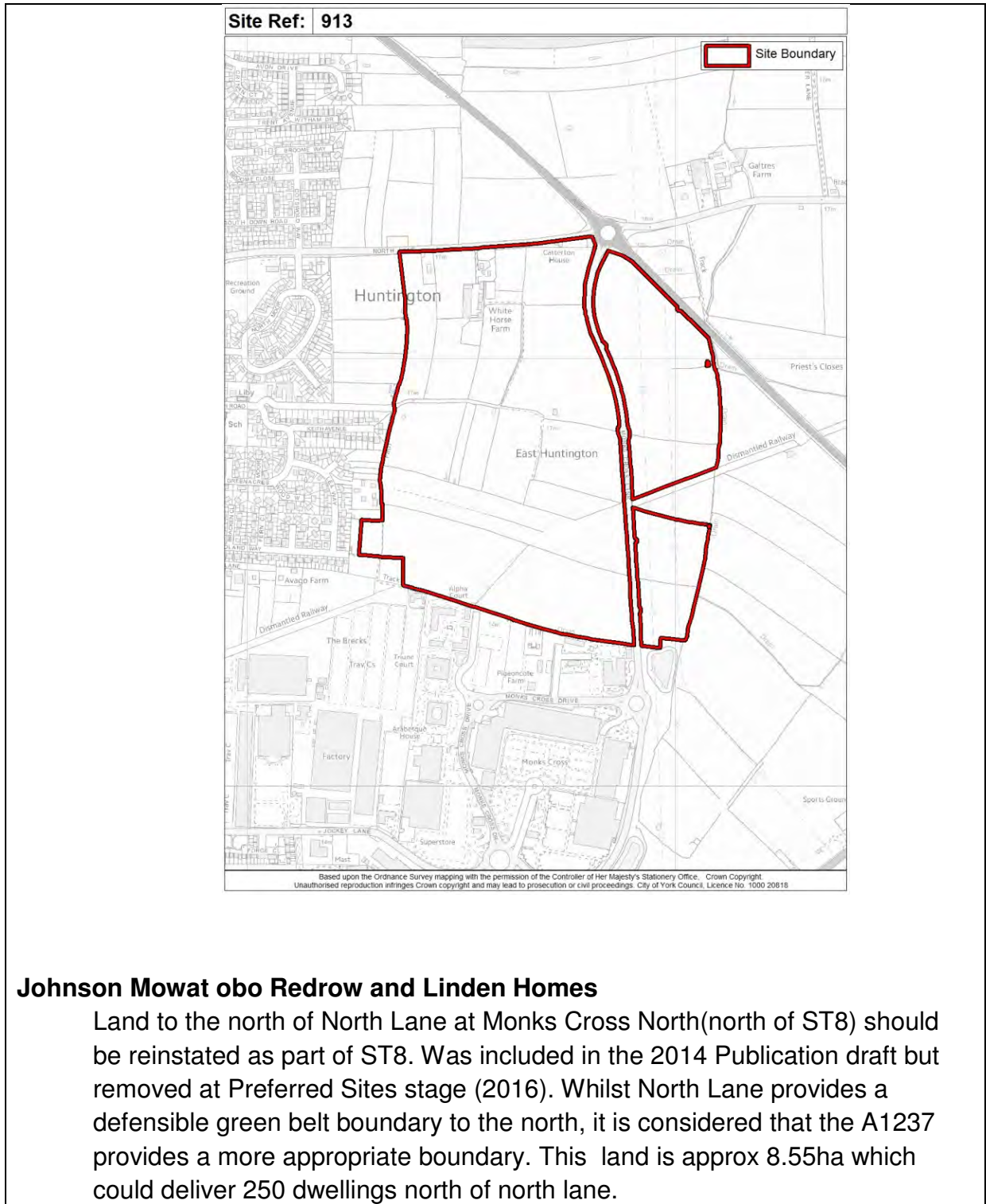
- Suggested additional land to form part of ST8. Land to west of western site boundary, and south of North Lane. Land formed part of ST8 at Publication stage. Land does not perform green belt function. Expanded site should deliver c1400 homes, assisting in the provision of a primary school, provide for a more open 'green' design, assisting in delivering community facilities, assisting in providing c100 more affordable homes and delivering wider economic benefits that would flow from the addition of 400 more homes with a construction value of around £40m.

Site Ref: 905




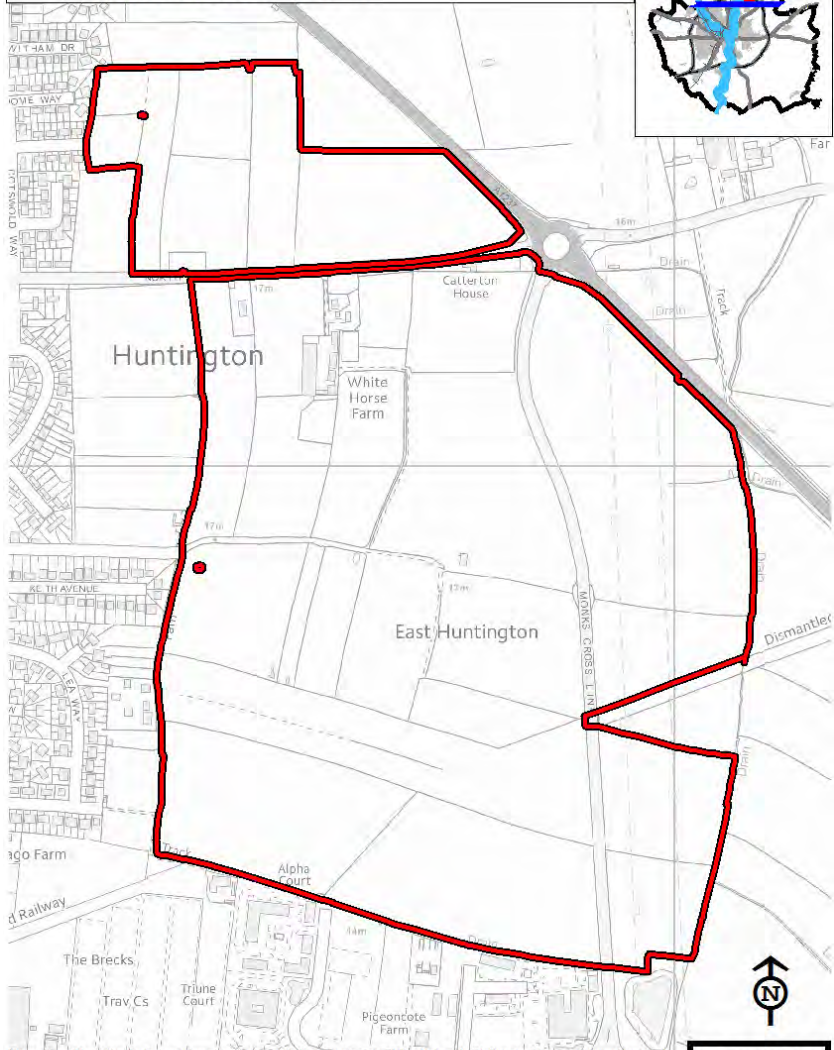
Johnson Mowat obo Redrow and Private landowners

Support the inclusion of ST8 as a strategic urban extension. Site is deliverable with national house builder on board to develop the site. Redrow own majority of site. Concerns with reduced scale of the allocation and wording of certain policies. Inconsistencies in relation to 'strategic green space' and 'new green wedge' immediately to west of ST8. Council confirmed intention for land to be designated as green belt. Do not consider that this land will perform green belt functions so should be identified as 'green wedge' not green belt. Masterplan being discussed with Council includes: open space, new access from Monks Cross Link Road with bus links to site, new primary school, appropriate landscaping, new playing fields and sports pitches. The masterplan identifies the primary school and playing fields in the green wedge to the west.



914: ST8 Alt with Land to North and Nature Reserve to East





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REP ID13104

ID Planning obo Green Developments

Support for an alternative site boundary for ST8 that includes land to the north of North Lane, Huntington . Object to proposed site boundary as it does not adjoin Huntington and therefore does not result in a natural extension to the urban area. Unclear why a 'gap' has been left between Huntington and the site allocation; this is unnatural. Support the position put forward by objectors at the Preferred Sites Consultation (2016) detailed in the SHLAA annexes that the boundary should be amended to make efficient use of the land currently identified in the gap. Current boundary at odds with the the plans vision to deliver sustainable pattern of development. Assume that ST8 as allocated would score worse than alternatives in Sustainability Appraisal due to gap to with Huntington. Do not accept conclusion of SA that this site is most appropriate option; consider alternative boundary incorporating land to the

north and west more sustainable.



SS11: Land north of Haxby (ST9)

Total respondents: 179	Support: 12	Objections: 163	Comments: 25
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Key Issues Raised

Support	<p>DPP Planning representing Linden Homes Strategic Land, Barratt Homes and David Wilson Homes Yorkshire East Division – The developers wholly supports the allocation of ST9, the estimated development capacity of which they confirm can be delivered in the Plan period. They further support the need for a masterplan to guide development on the site. Note suggested alternative policy wording below (comments).</p> <p>Carter Jonas obo client note that the whole of ST9 plus additional land to the immediate east may alternatively be considered for housing allocation in order to meet the OAN.</p>
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	<p>The small number of general supports received acknowledge that development would have benefits for current and future Haxby residents, principally in terms of proposed open space, affordable housing and improved rail accessibility. Those commenting in support note the need to improve infrastructure (schools, healthcare, housing mix incl dementia care, waste and water, cemetery extension) , and to ease congestion both locally and in relation to the ORR.</p>
<p>Objection</p>	<p>A significant number of objections were received in response to the proposed allocation of ST9 and its associated policy.</p> <p>Haxby Town Council notes the extent of local objection, and raises a number of concerns including the impact of development on access and congestion, open space (noting that the proposed 'buffer' has reduced) the natural environment, biodiversity, ridge and furrow fields, and a bridleway. They further query the lack of cumulative impact assessment given that further sites local to Haxby have been identified since Preferred Sites consultation.</p> <p>Strensall with Towthorpe Parish Council raises serious concerns about the allocation of this site - it is requested that the site be removed altogether, or substantially reduced in size. Sewage from this site will be treated at Walbutts Sewage Treatment Works, the capacity of which is unlikely to be sufficient to cope with the extra flows from Site ST9, together with sites ST35, E18 and H59. Traffic from ST9 may also use Strensall to avoid congestion in Haxby, exacerbating traffic problems.</p> <p>Both Cllr Cuthbertson and the Haxby and Wigginton Liberal Democrats, while accepting the need for new housing in York, believe that the number of houses indicated for this phase is too large for the community, retail and business facilities in the centre of Haxby.</p> <p>Turley representing Gallagher Estates state that development at site ST9 would result in the loss of pleasant agricultural land with a distinctive pattern of well trees hedgerows and a historic small scale/strip field pattern. The existing landscape framework would make a comprehensive development scheme, including playing fields and access, difficult to achieve without resulting in losses of trees and sections of hedgerows. The proposed open space would result in a development which is poorly related to the existing settlement. The development would result in a significant northern expansion of the existing settlement and would impact on the rural approaches along Moor Lane and Usher Lane. This allocation cannot be justified as representing the most suitable when considered against a reasonable alternative.</p> <p>Haxby and Wigginton Cemetery Committee request an amendment is made to the site boundary to protect the setting of the cemetery extension site.</p> <p>Pilcher Homes comment on the extent of the site's 'reach' north of</p>

Haxby, stating that its boundary should be tightened.

York Environment Forum object to the scale of development proposed, as the town is already overdeveloped and under-served.

Key issues raised include:

Transport and road safety:

- Issues with northern ring road (A1237/A64) and Haxby/Strensall roundabout would be compounded by further development north of Haxby. A substantial number of comments refer to the need to dual the outer ring road (A1237) prior to any further development taking place.
- Concern that existing bus provision is already unsatisfactory and could not provide for additional residents.
- Congestion and parking issues generally, and specifically in relation to Usher Lane/Station Road/Moor Lane/York Road and Wigginton Road

Inappropriate/inadequate access to the site

- point x 'Provide highway access via Moor Lane to the west, connecting with the B13363 Wigginton Road' needs clarification, as it suggests additional access would be provided directly from the B1363, which is not the case.
- A number of comments query the site's potential access, and its impact on Moor Lane

Green Belt/Greenfield development:

- Site is located in the Green Belt – development of housing is an inappropriate use.
- Object to this site and have huge concerns over sustainability and the impact on green belt around Haxby and Wigginton will be disastrous. Brownfield development should be exhausted first.

Drainage and sewerage:

- Potential for flooding caused by development on a green field site. A common concern relates to inadequate drainage and sewerage –
- Sewage from this site will be treated at Walbutts Sewage Treatment Works, the capacity of which is unlikely to be sufficient to cope with the extra flows from Site ST9, together with sites ST35, E18 and H59

Local facilities and amenities

Many comments point to the need for development to be self sufficient in amenities/services, including provision of a primary and secondary school. Issues include:

- Lack of parking in the town centre
- Lack of school space (noting the demolition of Oaken Grove) and requirements for new facilities.
- Healthcare – reference to appointment waiting time of 2 weeks
- Lack of green/open space
- Library/community space
- Employment – none provided through development of the site and little local employment. Likely that new residents would commute to York and beyond.
- While several comments support the reopening of Haxby Station, there are significant concerns raised regarding the need to consider parking and extra car journeys coming in to Haxby to use it. Some even question the viability of the proposal.

Overdevelopment in Haxby – impact on the character of the place, the loss of ‘village feel’ and community spirit

Impact on environment

- loss of ridge and furrow on the land and possible roman remains
- loss of grade 3a agricultural land – noting the effect of Brexit and need for self –sufficiency.
- impact on air quality - the inevitable increase in slow and stationary traffic will have particularly negative impacts on the health of children and elderly residents with respiratory problems.

A number of objections raise similar issues with consultation fatigue and the Council’s failure to listen to the views of residents voicing significant opposition to the scheme.

Typical comments - Too many houses in the proposed development, already have problems with access and drainage which have caused prior applications to be rejected, these problems have since got worse. Increase in traffic flow unacceptable, Usher Lane very narrow and unsafe for both drivers and pedestrians because of encroachment onto pavements. Congestion will worsen, negatively impacting air quality. Schools and medical already severely over-subscribed. Drainage already a problem that development will worsen, problems with standing surface water and backing up of sewage. Plan does indicate a small increase in the amount of green space but this is still below government guidelines. Council should prioritise brownfield sites over building on greenbelt, where greenbelt is only option it would be preferable to

	<p>extend the new garden villages with their own infrastructure and direct access to ring road rather than extending current small villages and damaging their character.</p> <p>Haxby and Wigginton is already heavily populated and the existing facilities have developed to meet the needs of the current population - there is no room for them to expand to meet the demand of an additional 735 houses. The infrastructure, esp. road network and drainage are already overloaded. The proposed accesses to the east and west are on existing lanes and have limited scope for improvement, road access from the south (along Usher Lane / Station Road and beyond along York Road to the Ring Road) are already heavily overloaded and this development will only make it worse. Access to the north is along narrow country lanes, over a very narrow hump back bridge and through a congested area of Strensall, past Robert Wilkinson Primary School, which is dangerous and is already a rat run. The northern Ring Road is already highly congested at peak times. Parking in Haxby is already inadequate around the shopping centre. Foul and surface water drainage is already inadequate and cannot cope with additional houses. The current land use is good quality agricultural land which should not be lost to housing when other sites are available. The land is also of historical importance, with ridge and furrow and Roman remains evident.</p>
<p>Comment</p>	<p>While Highways England does not object to the principle of development, they raise concerns about omissions from policy wording, namely: that the first sentence in key principle (ix) needs to be modified to <i>'Demonstrate that all transport issues have been addressed, in consultation with the Council and Highways England as necessary...'</i> Although the site is some way from the A64, its size, when considered with other large sites in the area, is likely to have an impact on the A64 at the junctions with the A1237 to the east and west of the city, so there should be a reference to the need to agree traffic impact and mitigation measures with HE. It is likely that a development of this scale will require capacity enhancement on the highway network, particularly if the cumulative impacts of sites around the A1237 is considered.</p> <p>Northern Power Grid - EHV infrastructure reinforcement may be required for this site. This may have impacts on development timescales so it is advisable that as soon as developers have details of their developments location and electrical capacity requirements they submit an application for connection to Northern Power Grid so they can provide a quotation for the connection and details of any reinforcement and/or diversion works that may be required.</p> <p>Network Rail has no objections in principle but would like it to be noted either within the text or the wording of the policy that the transport assessment to support the development should consider increases in traffic likely at level crossings in the Haxby area.</p>

Both Nether and Upper Poppleton Parish Councils and the Poppleton Neighbourhood Plan Committee note an inconsistency between SS11 and other sites (ST1/ST2) regarding the provision of a new primary school; there is not such requirement on sites ST1 and ST2 which would deliver some 1500 new homes.

The Haxby and Wigginton Neighbourhood Plan Steering Group makes a number of suggested concerns regarding the allocation:

- require provision of essential services to meet the needs of new residents and ease congestion
- existing congestion on A1237 including upgrades to Haxby and Strensall roundabouts.
- Sever traffic congestion in Haxby and Wigginton; using Moor Lane as primary access is likely to impact on existing communities – potential for alternative access?
- potential roman ruins/ridge and furrow on site
- impact of overhead cables
- shortage of affordable housing and need to deliver appropriate housing mix
- lack of employment allocation

Strensall with Towthorpe Neighbourhood Plan Steering Group

- Concerns about the clause vi) in respect to the additional loading of the Strensall with Towthorpe Waste Water Treatment Works and the increase road tanker traffic.
- The clause in x) the highway provision from ST9 to Towthorpe Road but be studied especially if the rail station is located close to Towthorpe Road. The extra road traffic needs to be considered in terms of its impact on Strensall and Towthorpe.

A number of detailed comments regarding the policy's guiding principles were raised by Cllr Cuthbertson and Haxby and Wigginton Liberal Democrats, as follows:

- the design, quality, type, mix and construction of any proposed housing on ST9 must take account of the character of the wards existing housing and its social and demographic mix.
- Affordable and social housing should be included.
- Provision for a variety of ages and social groupings should be considered.
- Green and open space should be provided and existing trees and vegetation maintained where possible.
- Housing density should be similar to existing Haxby housing densities.
- Concern over the retail shopping area in Haxby as it would need to

	<p>be expanded which is difficult in a conservation area. Prioritise retail over food outlets.</p> <ul style="list-style-type: none"> • Disappointing that no employment land has been allocated in Haxby / Wigginton. • Three local primary schools near capacity, limited secondary provision. New primary school required. • Health centre near capacity, additional facilities needed from the outset. • Key problem is surface water drainage and must be considered. Improved drainage needed in the buffer zone if it is to be used for open space. Flooding is an issue, pumping stations at capacity. Limited capacity of the sewerage disposal network. • Proposals on how to support increasing numbers of elderly residents must be included in the masterplan. • Cemetery expected to reach capacity during development period, space must be allowed for its expansion. • Space for a new library should be considered. • Appropriate social hall or meeting space required. • Dental and optical provision at capacity the provision of new facilities will be necessary. • Concern over air quality where there are heavy traffic movements and will cause respiratory issues. Monitoring of pollution levels should be carried out before a masterplan completed. • ST9 would have major impacts on wildlife, trees and vegetation. • National Grid power lines cross site ST9 health and safety concerns over these for residents, further information about the health and safety aspects of living near power lines should be provided alongside the masterplan for this site. • Parking an issue in Wigginton with no off street parking and Wigginton has no centre due to its linear nature. • Priority must be given to the provision of a detailed sustainable transport plan. • There must be improved access for Haxby and Wigginton to the wider road network. Including upgrading the A1237 roundabouts, a rail halt and improved bus service would also be needed. Current indicative Rail Halt location not viable due to lack of available land. A new site should be sought just outside the and to the north east of the village on Towthorpe Road based on fields between the road and the railway line. A parking area and possible bus terminus could be sites here and a footbridge over the railway line and footpath could be provided to Usher Lane. • Bus routes could be extended and additional routes added. Suggests new spine road through ST9. • Information regarding overloading at peak times on junctions near ST9 provided. Local roads to ST9 already at capacity at peak times. Concern Haxby used as a rat run for ST14, ST35 and H59. A masterplan is needed before development commences. • A clean safe pedestrian route should be provided from ST9 into the centre of Haxby to avoid people using their cars, alternative routes
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given. Existing Rights of Way through ST9 must be preserved.

The prospective developers (DPP Planning representing Linden Homes Strategic Land, Barratt Homes and David Wilson Homes Yorkshire East Division) understandably support the site's proposed allocation, but raise some concern re policy wording. Their suggested amendments are as follows:

- suggests reference is made for the need for the scheme to reflect up-to-date SHMA rather than to specify smaller family homes and bungalows/sheltered housing. Housing need may change across the lifetime of the Plan;
- Key principle iii) and the proposals map still shows a single large area of strategic open space to the south of the Site. The Developers maintain their concern that such a specific locational requirement could prejudice the ability to provide for the other planning objectives mentioned in policy SS11 and a properly considered layout. The Developers feel that the open space to be provided on the Site should be determined through the master planning process, which they fully support, and which can determine the optimum location for such spaces. Reword as '*...the proposed development of the Site should lead to the creation of new on site open space to reflect the needs of the Haxby and Wigginton ward including formal pitch provisions, informal amenity greenspace, play provision and allotments; the location of which is to be determined through the preparation and submission of a masterplan and in liaison with the Council, Haxby Town Council and Wigginton Parish Council, the neighbourhood plan group and local residents.*'
- Key principle x) suggests that the Proposed Development should seek to minimise the amount of trips using the Usher Lane/Station Road junction. There is no justification provided by the Council for this and the developer has demonstrated that a primary access and two secondary accesses onto Usher Lane can be accommodated. Request that this reference is removed from the policy.
- The Transport Assessment which has been submitted in support of the development of the Site does not explore the alternative access to the seat of the site onto Towthorpe Road suggested in key principle x) and the respondent would like to discuss this in more detail. Requests the removal of last sentence of key principle x).
- Noting the above, the developers suggest that key principle viii) be deleted and key principle x) be amended to 'Provide highway access via Moor Lane to the west, connecting with the B1363 Wigginton Road with secondary access to Usher Lane to the East of the site. Improvements would be required both to the junction of Moor Lane with The Village and Usher Lane/Station Road to improve safety and visibility. The scheme should seek to minimise the amount of trips using the Usher Lane/Station Road junction due to existing capacity and safety issues unless it can be demonstrated that these capacity and safety issues can be mitigated or that unacceptable harm to this

junction will not be caused as a result of the scheme.

- Julian Sturdy MP reiterates his previous concerns at the level of development afforded to Haxby which has taken much of the City's growth in preceding years. The ST9 proposal would be a significant development for an area which feeds onto the Outer Ring Road, so he would expect air quality to be considered in terms of numbers and the impact on Haxby and Wigginton residents.

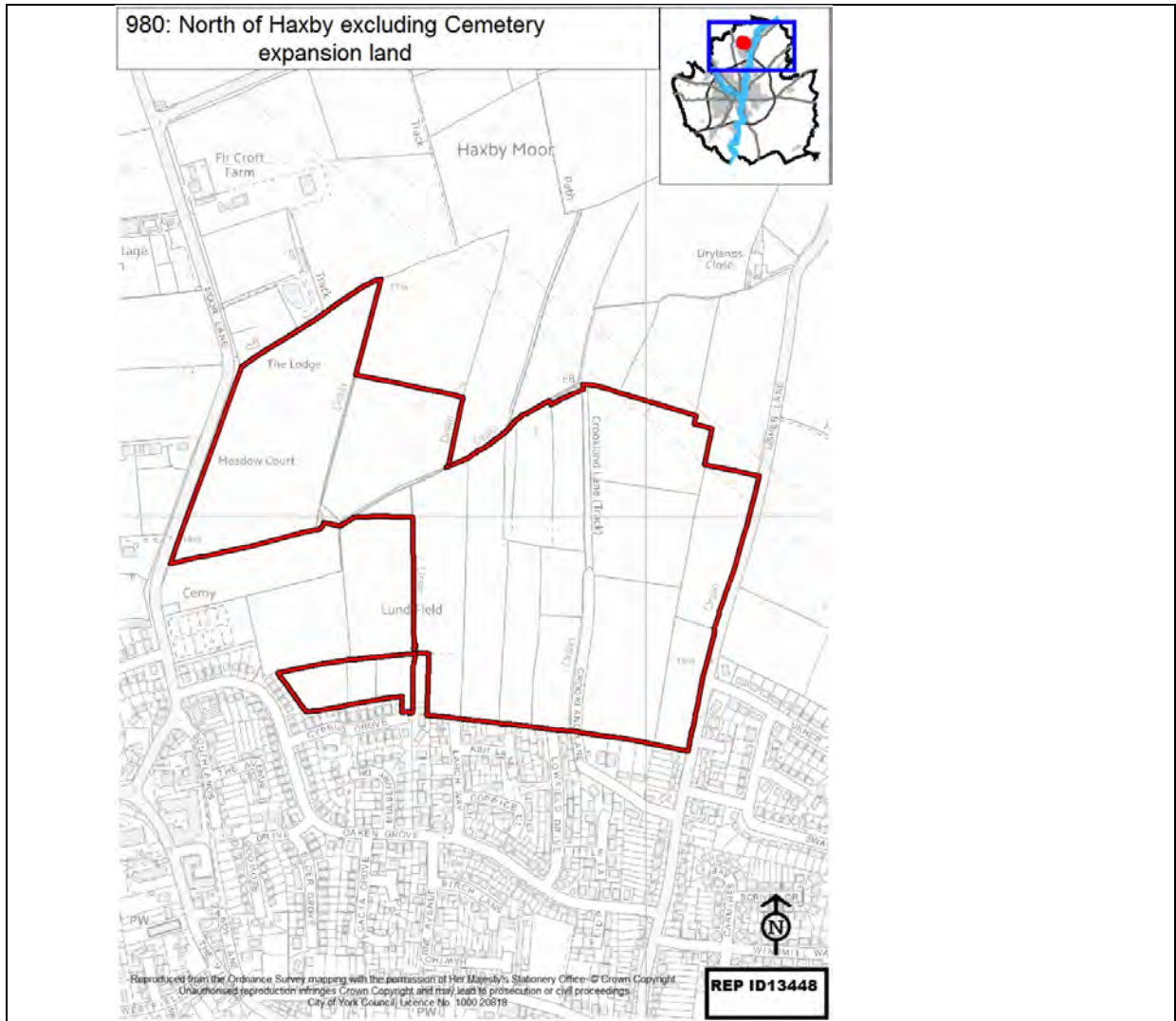
Those commenting on the scheme raise similar concerns to those objecting, albeit that they do not object in principle to the development:

- Support for the station reopening (with financial support from developer contributions) but concern that additional load on the York-Scarborough line would mean significant waiting time when crossing barriers are down;
- Road infrastructure should be improved before development progresses (notably the ring road). Junction at Usher Lane and Station Road is already dangerously busy, must be resolved to accommodate housing increase

ST9: Alternative boundary proposed

Haxby and Wigginton Cemetery Committee

Request an amendment is made to the site boundary to protect the setting of the cemetery extension site to preserve the tranquil nature of the site and avoid overlooking.



SS12: Land west of Wigginton Road (ST14)

Total respondents: 100	Support: 8	Objections: 75	Comments: 26
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Key Issues Raised

Support	<p>Skelton Parish Council welcomes the proposed reduction in the total housing numbers for York, and in particular the reduced size of ST14.</p> <p>Historic England states that harm to green belt would be less if settlement relocated to edge of city/ existing village. The site's size/location has taken account of the relationship which York has to its surrounding villages - identified within the Heritage Topic Paper as being part of the character of the City. Development does not threaten the identity or rural setting of neighbouring villages, preventing intrusion to the green wedge although there is work to do to deliver the housing in a manner which will minimise harm to the rural setting and the special character of York. Historic England also confirmed that they would object to an increase in the size of settlement as suggested by the site promoter.</p>
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	<p>General support for the location of a new settlement incorporating local facilities and transport links was received from the site promoter. However, they also promote 3 alternative boundaries for development.</p> <p>General support for the sites location was received from the Yorkshire Wildlife Trust in recognition of low biodiversity value of arable land.</p>
Objection	<p><u>Housing</u></p> <p>York Green party consider this a large development and think that reducing numbers on site should be considered.</p> <p>The site promoter considers that ST14 could accommodate a greater number of dwellings than the Local Plan currently envisages, whilst still preserving the character of the existing nearby communities & offers an exciting opportunity for a 'garden village' development.</p> <p>Land immediately to the north of this site (and south of Moor Lane) should be safeguarded for development after the current plan period (i.e. Excluded from Green Belt) and designed into the village road / path layout as a sustainable extension to the new village.</p> <p>Planning agents on behalf of housebuilders identify that ST14 is unsound in that it will not deliver the housing units identified in the Plan period. They consider that the site is isolated from existing settlements and located within the general extent of the green belt. Significant infrastructure will be required to bring the site forward and make it sustainable.</p> <p><u>Landscape and heritage</u></p> <p>Skelton Village Trust argues that this site is a significant intrusion into valuable green space separating Skelton and Wigginton.</p> <p>ST14 is not proportionate to the adjacent village of Skelton. Loss of agricultural land and open countryside. Infrastructure highway, facilities, drainage, water treatment will not support development.</p> <p>Will have an adverse effect on the rural setting of medieval Skelton.</p> <p>Skelton Village Action Group strongly object to the use of 55 ha of prime agricultural land in the Green Belt.</p> <p>The woodland belt contains views from the east, whilst to the north, south and west, views will be possible despite the site being relatively flat.</p> <p>A preliminary Landscape and Visual Appraisal Evidence submitted on behalf of a member of the public considered that the site lies in the</p>

middle of two important green views from York Minster, and development would have “major adverse” effect. The site would change the ‘established’ historic development pattern of the city and would comprise the first ‘planned’ extension to the City beyond the ring road, rather than the strengthening of the existing character of the city. Furthermore, development on the site would introduce visual detractors with increased amount of lighting which would conflict with landscape character.

The setting of the outlying villages would change as the scattered settlement pattern would become less apparent.

Some responses, including York Green party, considered that the decreased site size to 55ha, wouldn’t enable a sustainable standalone sustainable settlement. Sites over 100ha that could provide a minimum of 3,000 dwellings would be large enough to provide all the local services.

Some members of the public raised concerns in relation to the impact on green belt around Haxby and Wigginton which they consider will be disastrous. A long term evaluation for Green Belt of around 30 years needs to be carried out.

Transport

Highways England states that a site of this size is likely to have an impact on the A64 at the junctions with the A1237 to the east and west of the city.

Julian Sturdy MP argues that this site will significantly impact on York's already pressured transport network.

York Green Party argue that if built without additional sustainable transport provision will generate traffic congestion both in the immediate area and on arterial routes into the north of the city centre.

A number of Parish responses together with members of the public identified issues in relation to congestion on the outer ring-road. The majority of responses considered that the 1237 is already gridlocked and pollution is high and consequently there is a need to alleviate traffic problems.

Dualling of the ring road should be considered.

The increase in traffic would also have a bad affect on traders in the area.

The upgrading of infrastructure to support the development on ST14

would change the character of this rural road.

A Transport and Highways prepared on behalf of a member of the public states that ST14 will not achieve sustainable travel. There are existing issues associated with severe delays and congestion. Improvements to the junction and the dualling of the ORR will be required and finding/ third party land to achieve this is uncertain.

Cycling from Haxby to the city centre difficult, suggests a segregated cycle route like the one between Clifton Moor and Haxby Road to encourage more journeys into the city.

Education and Facilities

Many responses questioned the level of educational and local facilities on site and when these would be delivered. Most of the responses also recognised that there would be an increase traffic in and out of the development.

Should provide finance for an additional primary school, and there is not enough parking spaces in Haxby and Wigginton at present.

Ecology

An Ecology Appraisal Update prepared by a member of the public concludes that the ST14 will cause loss of habitat, disturbance and fragmentation within ecological sensitive areas (namely Nova Scotia Plantation and Clifton Airfield SLI) and potentially affect protected species (badger and great crested newts).

General

Site has not been assessed against reasonable alternatives in the Sustainability Appraisal, nor is it deliverable or developable when considered in the context of the NPPF.

Consultants Turley Associates representing Gallagher Estates consider that due to the site's relative isolation from the existing highway, new roads would need to be developed crossing tracts of intervening countryside. This allocation cannot be justified as representing the most suitable when considered against a reasonable alternative.

Suggests that new housing should have solar panels and enough garden space.

Objects to nearby fracking.

	<p>Other sites in York (identified in the Plan) should be prioritised.</p> <p>Questions police resources and the ability to provide extra officers to police the area.</p> <p>Lichfields on behalf of Wakeford Properties do not consider ST14 is deliverable in the context of the NPPF as there is no indication when it will be permitted, it had multiple land ownership, is complex to deliver with phased delivery and the site is isolated with no existing infrastructure.</p> <p>Support prioritisation of brownfield land, concerned by proposed building on 55ha of green belt for this scheme.</p>
<p>Comment</p>	<p>Yorkshire Wildlife Trust consider that ST14 has the potential to be expanded as it is within arable farmland which will have low biodiversity. A net gain in biodiversity would be possible with well planned green infrastructure. Sustainable transport links to Clifton Moor across the A1237 would be quicker than car journeys so would encourage more active travel. Links by cycle to a new rail station at Haxby would also be possible and would enable car free commuting to work and schools etc.</p> <p>Skelton Parish Council consider that the development would increase traffic flow and potential 'rat running' through Skelton to avoid the A1237. Improvements to the Northern Ring Road are vital.</p> <p>York Georgian Society and Conservation Areas Advisory Panel suggests policy should reference best practice as exemplified at New Earswick, the work of Parker and Unwin reflecting the first Garden Village movement.</p> <p>Skelton Village Trust recognised that ST14 has extensive tree cover which needs to be conserved.</p> <p>The creation of a local centre needs joined-up thinking which includes transport and the city centre. The traffic aims need consideration within the process of urban design.</p> <p>Will cause more congestion, road improvement needs to happen before more houses are built and ring road is dualled.</p> <p>Should be possible to walk/ cycle if able.</p> <p>There is no dedicated bus service to this site.</p> <p>Haxby and Wigginton Neighbourhood Plan Steering Group consider that it would be more cost efficient for development at ST14 rather than ST9. Would provide the opportunity for community design. They also consider that there is a need for a traffic plan for Wigginton Road/A1237 and new services (GPs, dentists, schools, library, cemetery, church/mosque,</p>

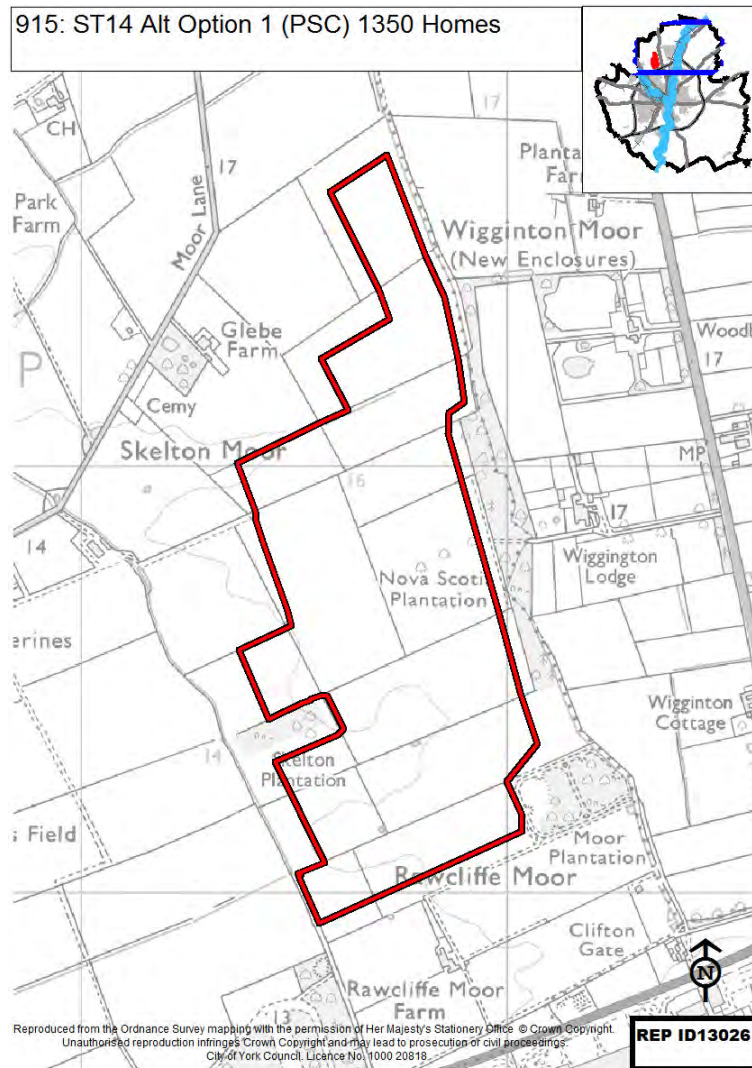
	<p>green space, shops, parking), employment land (incl parking), transport links).</p> <p>No access by Moorlands Road/ Moor land as the road is too narrow and should not be widened.</p> <p>Northern Power Grid confirm that there is a potential need for network reinforcement for connections to site to accommodate the additional load but the level of detail available in the plan is not sufficient to quantify the extent at this stage. EHV infrastructure reinforcement may be required. May impact on development timescales advised so developers should submit an application for connection to Northern Power Grid.</p> <p>CPRE - North Yorkshire seek clarification how sustainable communities will be supported at this location as it is remote from existing infrastructure. New units would work better attached to another proposed new garden village or as a extension to existing settlement.</p> <p>YEF considered that If development was increased in size to 5000 units and external transport issues addressed, a case could be made for development to take pressure off ST15 and ST9.</p> <p>More houses and a secondary school needed at site.</p> <p>The site promoter considers that this Garden village site is suitable with no technical constraints. However, whilst support principle of development three alternative boundaries are submitted which support proposed access points with no access to Moor Lane (to the north). Likely to have 2 outlets commencing from start of development to 4 outlets delivering 120-150 homes per annum.</p>
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ST14: Alternative boundary proposed

1) Paul Butler Planning OBO Barratt Homes, David Wilson Homes and TW Fields

The developer objects to the allocated boundary and housing number. Alternative boundary is re-submitted suggesting 1350 homes. Boundary includes additional land to the north with some externalised openspace. Approximately 60-70% net developable area which equates to 42.3 ha net site area at 32 dph. Expansion of the site supports the case for higher housing numbers in York. Consider that 1350 would be delivered within the plan period. Design retains view of the Minster and separation distances to Skelton and Wigginton Road. Distance to Clifton Moor would be 0.46km. This development would deliver the principles set out in policy SS12. The vision and proposed masterplan of the site is landscape led development which is separated from the existing urban edge and surrounding villages to ensure preservation of historic character and setting. Access as proposed on Proposals Map. 2.26 ha of land for the provision of a nursery, 2 form entry primary school with secondary contributions. Provision of 16.52ha of openspace within the site boundary

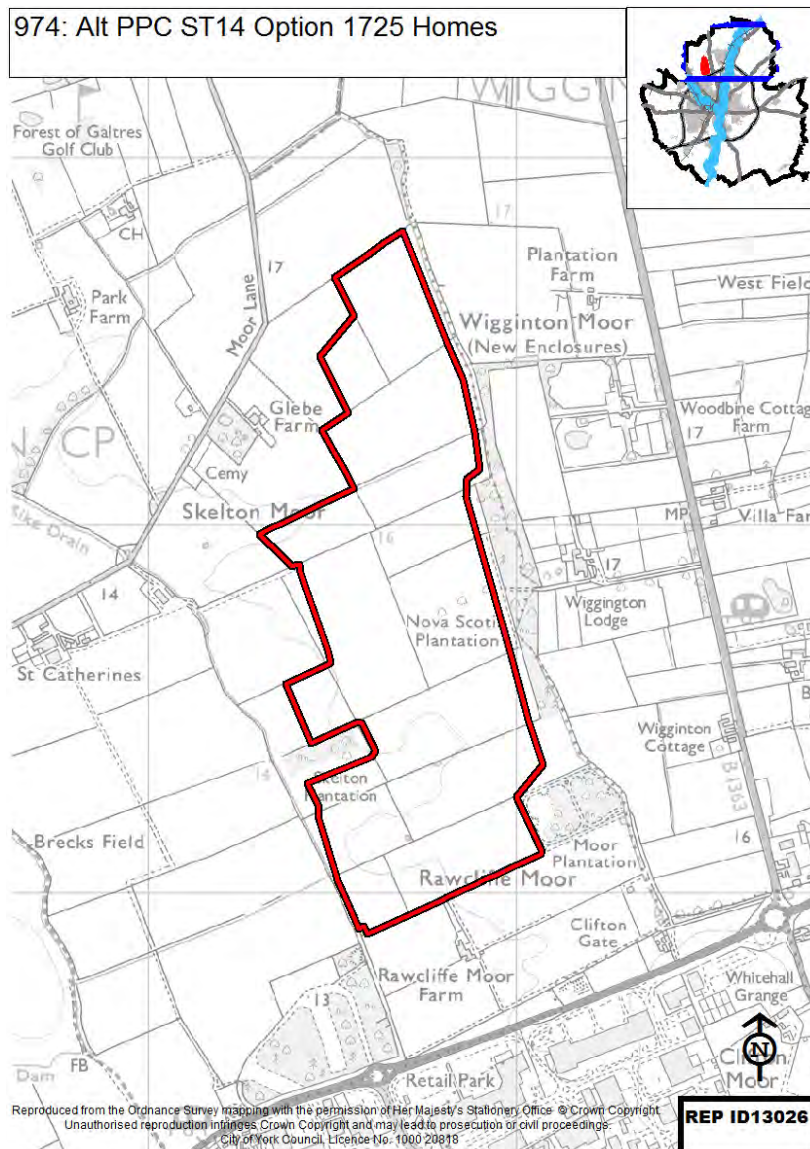
and substantial area of green space on western boundary. Evidence base submitted for the area are relevant to this option.



2) Paul Butler Planning OBO Barratt Homes, David Wilson Homes and TW Fields

The developer objects to the allocated boundary and housing number. Alternative boundary submitted suggesting 1725 homes, which is their recommended option. Boundary includes additional land to the north with some externalised openspace. Approximately 60-70% net developable area which equates to 53.9 ha net site area at 32 dph. Expansion of the site supports the case for higher housing numbers in York. Consider that 1725 dwellings could be delivered within the plan period. Design retains view of the Minster and separation distances to Skelton and Wigginton Road.

Distance to Clifton Moor would be 0.46km. This development would deliver the principles set out in policy SS12 with proportionate enhancement of benefits. The vision and proposed masterplan of the site is landscape led development which is separated from the existing urban edge and surrounding villages to ensure preservation of historic character and setting. Access as proposed on Proposals Map. 2.26 ha of land for the provision of a nursery, 2 form entry primary school with secondary contributions. Provision of 17.12ha of openspace within the site boundary and substantial areas of green space on western boundary. Evidence base submitted for the area are relevant to this option.



3) Paul Butler Planning OBO Barratt Homes, David Wilson Homes and TW Fields
The developer objects to the allocated boundary and housing number. Alternative

boundary is submitted suggesting 2200 homes. Boundary includes additional land to the north and south with some externalised openspace. Approximately 60-70% net developable area which equates to 67.9 ha net site area at 32 dph. Expansion of the site supports the case for higher housing numbers in York and the requirement to ensure a permanent Green Belt. Consider that 2200 dwellings could be delivered within the plan period of a care home and build to rent are implemented within first 5 years. Design retains view of the Minster and separation distances to Skelton and Wigginton Road. Distance to Clifton Moor would be 0.25km. Distance to Clifton Moor would be 0.42km. This development would deliver the principles set out in policy SS12 with proportionate enhancement of benefits. The vision and proposed masterplan of the site is landscape led development which is separated from the existing urban edge and surrounding villages to ensure preservation of historic character and setting. Access as proposed on Proposals Map. 2.26 ha of land for the provision of a nursery, 3 form entry primary school with secondary contributions. Provision of 27.09 ha of openspace within the site boundary and substantial areas of green space on western boundary. Additional openspace to north which would likely be new woodland plantation. Evidence base submitted for the area are relevant to this option.



SS13: Land west of Elvington Lane (ST15)			
Total respondents:	Support: 37	Objections: 119	Comments: 42
175			
Key Issues Raised			
Support	<p>Historic England support the principle of development as part of the overall strategy to accommodate growth. The degree of harm of development in this location is less that should this volume of housing be located on the edge of the main urban area or surrounding settlements and the shape takes into consideration key views from the ring-road. Development of a new garden village as opposed to development in alternative locations adjacent to the urban area was also supported in representations from some members of the public.</p> <p>Natural England broadly welcome Policy SS13 and the inclusion of criterion relating to no net loss of biodiversity which maximise enhancements.</p> <p>General support for the policy SS13 and principle of development for ST15 was received from some members of the public and the site developers, particularly because:</p> <ul style="list-style-type: none"> • This uses brownfield land • There is potential for sustainable connections to the University of York's Campus East • The size of the site could provide for social infrastructure • There would be linked openspace/ wildlife creation areas • Some representation supported higher numbers on the site to ensure viability of on-site facilities. • Impact on Heslington village reduced as the boundary is further away. <p>Dunnington Parish Council were also in favour of infrastructure being provided on the A64 prior to commencement of development. To minimise impacts, public representations support the idea of retaining Common Lane as a pedestrian/cycle route and extending these routes to connect with the existing network.</p> <p>The designated new area for nature conservation is also supported. However, clarification is required to ensure that public access to the nature conservation area is limited and does not compromise mitigation.</p> <p>Support from willing landowners was received for all parcels of land included in the allocation.</p> <p>Both Heslington Village Trust and Heslington Parish Council welcome the reduction in the size of the proposed new town as this will reduce pressure on the A64 and Hull Road. They also support the site's location</p>		

	<p>being further away from the SSSI of Tilmire Common and A64. Concerns remain however in relation to open space and access arrangements.</p> <p>A Wheldrake ward councillor notes that both Elvington and Wheldrake Parish Councils are broadly supportive of the proposed new 'garden village' as it would alleviate pressure on already over-stretched services and infrastructure and limit future infill in these villages. Overwhelming support has been for an enlarged 'garden village', as proposed by the developers, which would support a new junction onto the A64, thereby relieving traffic and congestion on the B1228 should the development proceed, and which would take up the overflow from the villages, rather than have them stretched to the point where services will start to fracture. Note concerns re local infrastructure.</p>
<p>Objection</p>	<p><u>General</u></p> <p>Some respondents felt that there was a lack of justification for the site's inclusion and the amount of information provided in relation to its impacts.</p> <p>There is no link made between policy SS12 and Policy H5.</p> <p>There will be environmental protection impacts due to proximity of neighbouring industrial estate. Screen planting and consideration of air and noise pollution is required.</p> <p>Loss of airfield and development in this area may have negative economic impact on existing businesses.</p> <p>The size of this is not a village; it is a town and should therefore be referred to and planned as such.</p> <p>Through the response there were requests for the policy to be strengthened to ensure that a 'green' settlement.</p> <p>Existing facilities are already at capacity.</p> <p>The existing airfield is in existing leisure use.</p> <p><u>Boundary</u></p> <p>The developer objects to the boundary and seeks to increase this to make the site more viable to deliver all necessary green, social and transport infrastructure to ensure a cohesive and sustainable settlement is developed that also addresses the ecological issues identified. Their proposal is for 246 ha and 4,500 dwellings delivered with an additional circa 130 ha for nature conservation mitigation. They also disagree on including land in third party ownership which complicates delivery and the nature conservation mitigation as proposed.</p>

A number of public and planning agent representations object to the boundary proposed on the following grounds:

- The site needs to be enlarged to support a self sustaining settlement with required social infrastructure and transport access. A sustainable garden village should be for a minimum 5,000 homes.
- Moving the boundary northwards would limit biodiversity impacts on the airfield and impacts on Elvington.
- More brownfield land available which should be used for development to reduce green field development.
- Current boundary is out of proportion to surrounding settlements.

Delivery

A number of objections are raised in relation to delivery on the following grounds:

- there is no indication when it is likely to be permitted;
- lead-in to the site will be a minimum of 5 years;
- the land is in multiple land ownership;
- the site is complex to deliver with phased delivery; and
- the site is isolated with no existing infrastructure capable of accommodating the development, which will inhibit delivery or delay building.

Biodiversity and openspace

Yorkshire Wildlife Trust and members of the public raise concerns that there is high potential for development in this position surrounded by wildlife sites to have significant residual impacts on wildlife and biodiversity despite mitigation and compensation. Key impacts are raised in relation to the Heslington Tillmire SSSI, the airfield SINCs and Lower Derwent Valley SPA. Suggestions for design include unlit roads to village, significant screening including using bunds, public protection orders on the Tillmire and management plans for wildlife.

Concerns were raised by several members of the public in relation to detrimental effects on farming of the area and the need to ensure this remains viable. Objections are also raised in relation to the cumulative loss of farmland in this area over the course of time, including for the identified new openspace OS10.

The site promoter disagrees with the timescales for delivering the ecological mitigation and considers that the proposed OS10 area is justified for the proposed settlement.

	<p><u>Transport</u></p> <p>Highways England response states that a site of this size, especially when considered with other large sites in the area, is likely to have an impact on the A64 at the junctions with the A1237 to the east and west of the city, so there should be a reference to the need to agree traffic impact and mitigation measures.</p> <p>The developer disagrees with the road alignment for access onto the A64. This is not feasible and needs to be moved westwards as shown is technical work.</p> <p>General concerns were raised in relation to increased traffic and congestion in the area not leading to sustainable travel. It is suggested that the policy is strengthened to ensure issues in relation to traffic are addressed. Specific issues were raised with regards to the A19, A1079 and B1228 connected with congestion, commuting / HGVs and consequential effect on pedestrian safety and availability of sustainable transport options (including from Julian Sturdy MP). Concerns were also raised in relation to access to Heslington/ businesses via Common Lane and that methods for controlling access into the village need to be agreed.</p> <p><u>Heritage and landscape</u></p> <p>Several public responses suggest that the airfield should be protected for historic reasons as well as leisure and tourism, particularly in connection with the air museum.</p> <p>A number of responses raised that this development will have an urbanising effect on this area of York, which would be detrimental to the historic character and setting. Concerns were also raised in relation to the potential character of Elvington being eroded by new development.</p>
Comment	<p>Historic England considers that there is further work necessary to understand the scale of transport infrastructure and mitigation to minimise harm. Further representations agree that this will require a significant investment and that the cumulative impacts on the network need to be understood in more detail.</p> <p>The site should ensure that existing tourist attractions such as the Air Museum and Maize Maze are not negatively affected by development.</p> <p>It is recognised that compared to previous iterations, less greenfield land is included in the proposed allocation.</p> <p>Any garden village development should reference best practice examples in York such as New Earswick. They should also commit to</p>

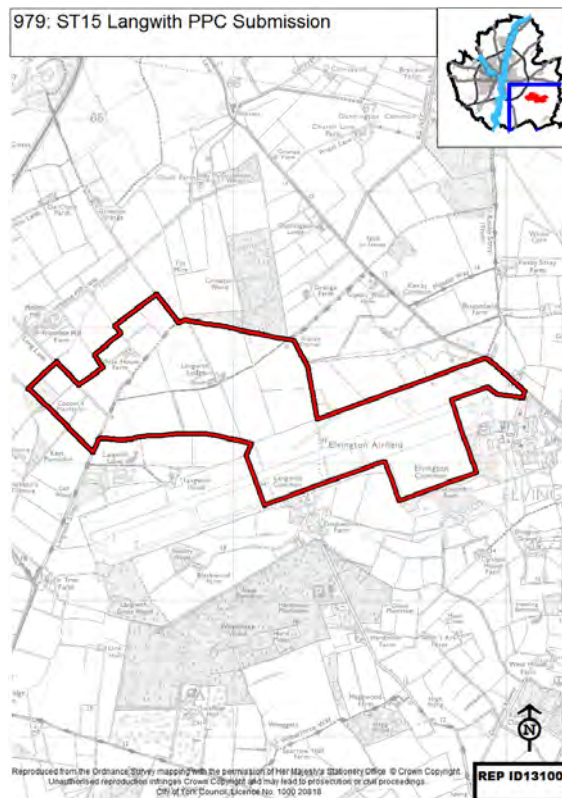
high standards of sustainable design and construction, including renewable energy and low running cost development. Existing connectivity via footpaths and cycleways should be enhanced and stronger links made to health and well-being policies. A few representations also expressed concern for the safety of pedestrians and cyclists on existing routes used for farm vehicles.

ST15: Alternative boundary proposed

Alternative boundary options were submitted through the consultation. These are summarised as follows:

1) Sandby/ Oakgate

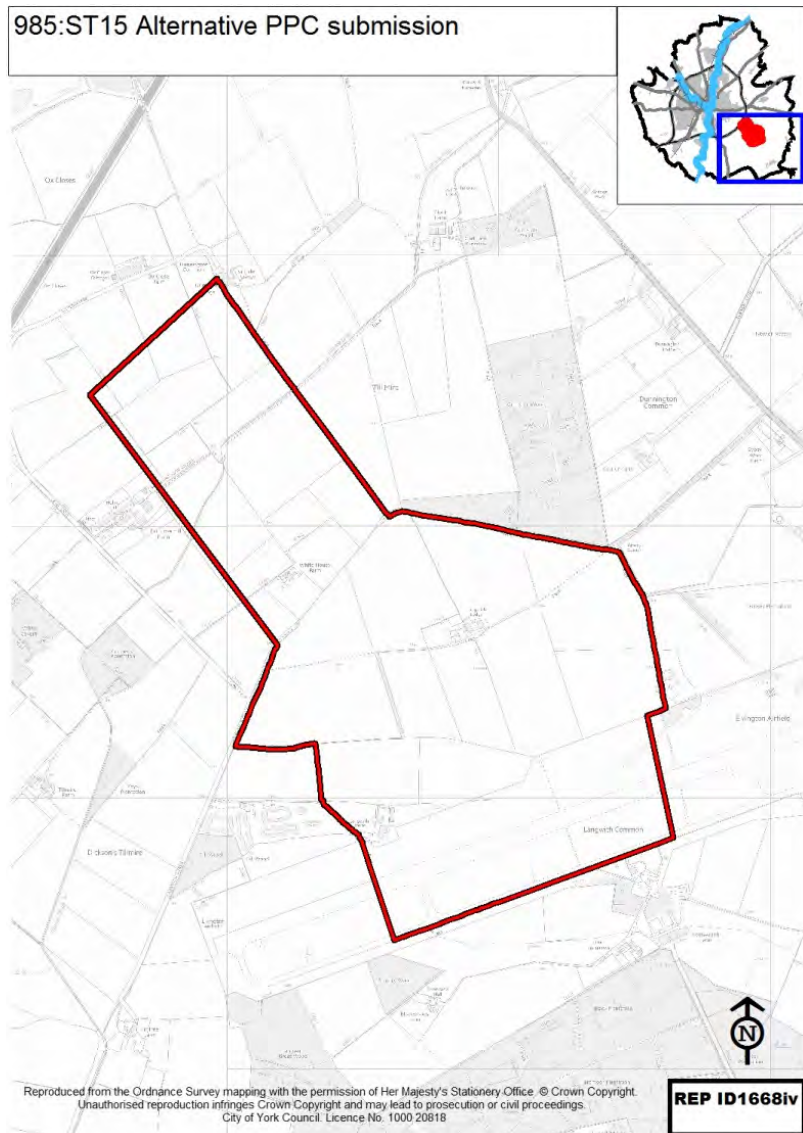
The developer objects to the allocated boundary and housing number. Alternative boundary is re-submitted, which concurs with previous submission in 2016 for 246 ha and 4,500 dwellings (circa 2,400 within the plan period) but is slightly amended to exclude land on the eastern boundary to enable expansion of the existing Airfield Museum. This site is proposed to be delivered at a 60% net site area at 35-45 dph density. Outline planning circa 2019 with site delivery starting in 2021 with a development trajectory of approximately 23 years.



2) PB Planning obo Barratt and David Wilson Homes (overleaf)

Object to boundary of proposed allocation. Boundary should be extended to the northwest, with the following reasoning: would enable delivery of 4,000 homes, increasing the development's viability and deliverability, with particular reference to the feasibility of providing principle access from the A64 due to proximity. This would

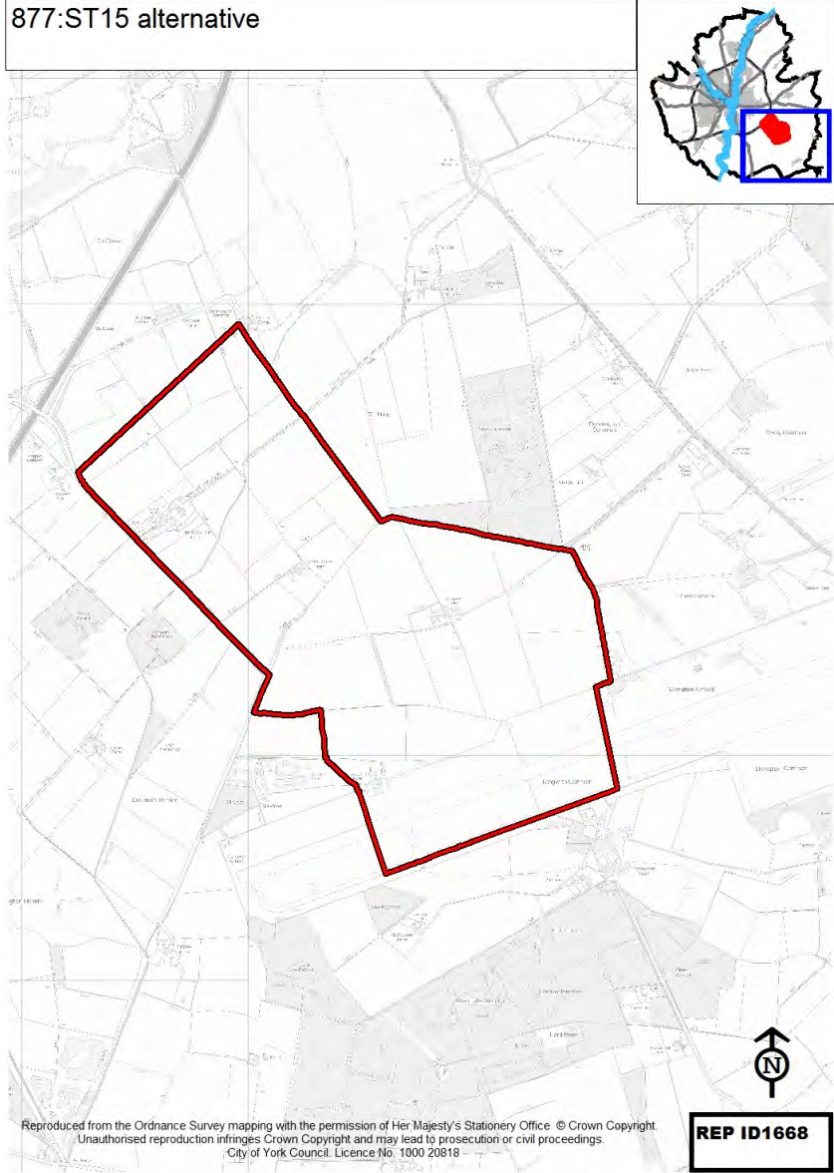
also enable early delivery on site, since access construction times would be reduced; CYC will require additional housing sites to those already identified in order to meet housing need - this site could provide necessary flexibility; no additional impact on biodiversity or historic/ landscape character; would retain separation distances with Elvington Lane / Heslington and replicate historic patterns of development (satellite settlements). Refers to 10th July LPWG report and officer commentary not to include alternative boundary due to concerns relating to landscape and heritage impacts.



3) PB Planning obo Barratt and David Wilson Homes (overleaf)

Rep suggests alternative boundary, providing 268.4ha site, approx 4,000 homes (1,620 within the plan period) developed at 30dph across 50% net site area. This net/gross split and lower development density better reflects garden village principles. Planning application submitted 2019 following adoption of Local Plan. Housing trajectory submitted. No identified technical/environmental constraints (suitable); no legal or ownership constraints (available); viable housing development can be achieved within first 5 years of the Plan (achievable). Land can be considered a deliverable residential development site and its release would deliver a number of significant economic, social and environmental benefits.

877:ST15 alternative

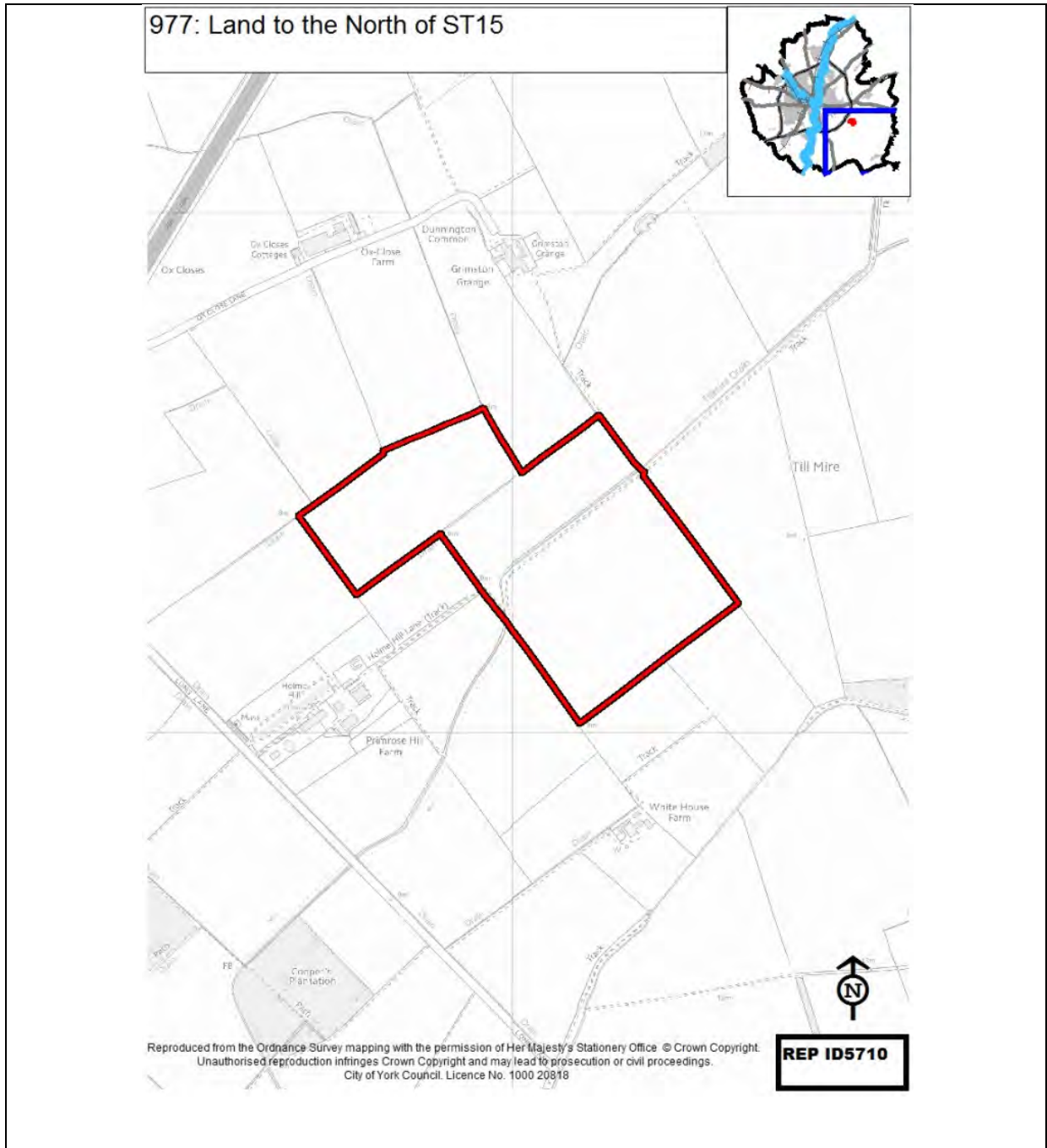


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REP ID1668

4) Yew Tree Associates on behalf of landowner (overleaf)

Land located to the north of ST15. Support this site's inclusion in an expanded ST15 boundary. The site is considered to be available with a willing landowner.



SS14: Terrys Extension Sites (ST16)

Total respondents: 10 **Support: 3** **Objections: 2** **Comments: 6**

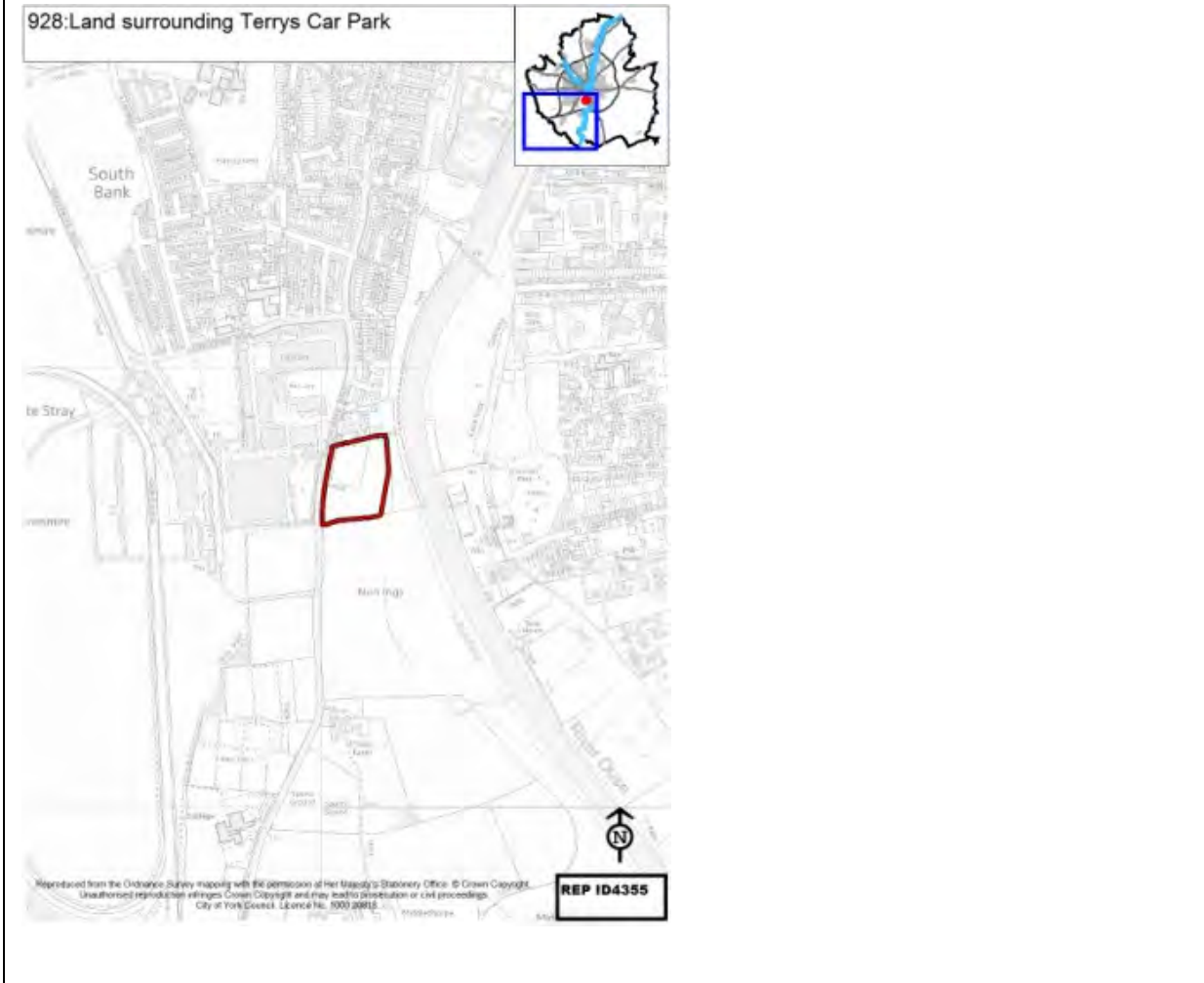
Key Issues Raised

Support	Ext 1 - Historic England supports the policy's key principles, including the requirement that development: achieves high quality urban design which respects the character and fabric of the wider site and buildings or architectural merit. This includes conserving and enhancing the special character and/or appearance of the Tadcaster Road and the Racecourse and Terry's factory Conservation Areas.
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	<p>Ext 2 – Historic England supports the policy's key principles, including the requirement that development: delivers high quality urban design, given the site's association with the wider Terry's factory site and location as an entry point to the City. This includes conserving and enhancing the special character and/or appearance of the Tadcaster Road and the Racecourse and Terry's factory Conservation Areas; Is of low height and complements existing views to the factory building and clock tower from the Ings, Bishopthorpe Road and the Racecourse; Constrains development to the boundary of the car park, including any open space requirements.</p> <p>Ext 3 – Historic England supports the policy's key principles, including the requirement that development: retains and enhances the formal gardens area adjacent to the site; achieves high quality urban design which respects the character and fabric of the wider site and buildings or architectural merit. This includes conserving and enhancing the special character and/or appearance of the Tadcaster Road and the Racecourse and Terry's factory Conservation Areas; complements existing views to the Factory and clock tower.</p> <p>Henry Boot Development supports the allocations of the three Terry's Extension Sites (Phases 1, 2 & 3) as housing allocations under Policy H1, and would like to point out a minor typographical error in that all three sites are listed under Strategic Site ST14 rather than ST16.</p> <p>A small number of general supports received.</p>
<p>Objection</p>	<p>Henry Boot Development – policy HW6 identifies ST16 to provide a 'spoke' facility for the Yorkshire Ambulance Service. It is presumed this should actually refer to ST16 sites 2 & 3 i.e. Terry's Car Park (Site 2) and Land to the Rear of Terry's Factory (Site 3). Site 1 is the clocktower and could not physically accommodate such a facility. Henry Boot Development, the owner of both sites, has at no time been approached by the trust or council to discuss this requirement and considers that such a use at this location would be unjustified and therefore unsound. HBD therefore object to this draft policy and would particularly question the suitability / deliverability of these sites as a potential location for such a facility given that no evidence is provided in the Plan to explain why these sites are considered suitable, and what other sites have been considered and why they have been discounted. For example neither site is close or readily accessible to a major highway and development of such a facility would impact upon deliverability of planned beneficial regeneration of the site and potentially impact on heritage significance of the site. Site 3 would be particularly unsuited given its relationship to listed buildings, likely impact on residential amenity and access issues. Site 2 might physically be able to accommodate such a facility but this would impact on deliverability especially if the council maintain their stated desire to seek only low level development on this site. Reference</p>

	<p>to all ST16 Terry's sites should be removed from policy HW6.</p> <p>A small number of general objections raising the following concerns: scale of development would not accommodate a self-sustaining community; impacts on congestion and lack of public transport alternatives;</p>
Comment	<p>York Green Party comments on a number of issues: There is no reference to affordable housing on this site. A principle requiring affordable housing should be added – this site which was originally subject to widespread resident consultation has hugely disappointed by delivering housing and other services that are way beyond the budget of most local residents. Regarding Terry's Car Park site, support this principle: <i>'ii. Be of a low height and complement existing views to the factory building and clock tower from the Ings, Bishopthorpe Road and the Racecourse.'</i> Add <i>'Development should complement the rural character of the Ings up to where it joins the cycle path and incorporate a suitably graded disabled accessible route between Bishopthorpe Rd and the riverside.'</i> Add <i>'v) A full controlled pedestrian and cycle crossing must be provided to facilitate access between the main site and this extension.'</i></p> <p>CPRE raise concern as the policy does not refer to the need to deliver an appropriate mix of housing. This would ensure a mix of housing and tenures was delivered on this site located within walking and cycling distance of local amenities and close to public transport routes.</p> <p>The small number of comments received relate to the need to restrict the height of development in respect of the factory building and the setting of the site (max 2.5 storeys); would support affordable homes;</p> <p>ELG Planning on behalf of Henry Boot Developments Ltd states in relation to the Phase 2 Terry's Car Park Site, the figure of 33 dwellings is due to the Council's wish for a low profile development on this site. This ignores the positive visual, landscape and urban design benefits from a taller and denser development. This could be achieved on the car park site without compromising views of the Multi Storey Factory and Clock Tower. In relation to Phase 3 Land to the Rear of Terry's Factory supports housing allocation but suggests 100dpa instead of a density of 50dpa (56 dwellings), as this is to a normal density of a town centre site.</p>
<p>ST16: Alternative boundary proposed</p>	
<p>England Lyle Good Town Planning OBO Henry Boot Developments</p>	
<p>Henry Boot Developments Ltd request that consideration is given to extending the allocation of ST16 phase 2 (Terry's Car park) to include additional land to the South and East as a logical extension capable of accommodating additional housing development. It is suggested that this is in a sustainable and accessible location without harm to other key interests, extending the site gives greater opportunity to deliver wider landscape and access enhancements to the surrounding land enhancing the green infrastructure network. Analysis is provided as to how the</p>	

extended site does not meet greenbelt purposes and would not adversely impact on the conservation area setting or views of the clock tower.



SS15: Nestle South (ST17)			
Total respondents:	9	Support:	3
		Objections:	4
		Comments:	3
Key Issues Raised			
Support	<p>Historic England endorses the stated planning principles, especially the requirement that development: achieves high quality urban design which recognises the distinctive character of this part of the city and respects the character and fabric of the factory buildings of distinction including those on the Haxby Road frontage, including the library; conserves and enhances the character and/or appearance of the Nestle/Rowntree Factory Conservation Area; retains mature trees along Haxby Road frontage and protects the setting of the site. They agree that these measures will help to ensure that the development of this site takes place in a manner which reflects its sensitive location.</p> <p>A small number of general supports for the site were also received.</p>		
Objection	<p>Network Rail - The Nestle site can only be supported as an allocation if the existing level crossing can be permanently removed and replaced</p>		

	<p>with a road bridge or alternative measures are put in place to limit access across the level crossing. One of the key entrances to this site [ST17] will be via the Bootham Level Crossing - a high risk crossing located on Wigginton Road. Suggest that wording is added to the policy which seeks consideration of the level crossing as part of future development proposals . NR would object to the allocation without the inclusion of a reference to the level crossing upgrade.</p> <p>Small number of objections received, on the grounds of impact on congestion.</p>
Comment	<p>Highways England recommends that the following text is added to the list of key principles: <i>'Demonstrate that all transport issues have been addressed, in consultation with the Council and Highways England as necessary, to ensure that as many trips as possible are taken by sustainable travel modes and promote and facilitate modal shift from the car.'</i></p> <p>York Travellers Trust notes that a significant requirement of policy H5 is missing from SS15, namely that large housing sites are required to make provision for Gypsies and Travellers by providing pitches, land or commuted sums, is missing from SS15 wording. This should be stated as part of the policy's development principles.</p> <p>York Green Party makes the following suggested amendments: iv. Maximise accessibility and connectivity to the city centre and local area by pedestrian and cycle routes, including direct access from the site to the Foss Island Cycle Path which runs alongside the site boundary. vii. Assess appropriate access from both Haxby Road and Wigginton Road along with associated junction improvements as necessary through Transport Assessment and Travel Plan. Access between Haxby Road and Wigginton Road will be limited to public transport and walking/cycling links only. Strongly support. Add 'segregated, purpose built cycle link'. Add: Phase 2 must include an assessment of the need for any further on-site community facilities such as community meeting space, local shops, cafes, doctor's surgery, childcare facilities, onsite open space and play areas. These requirements should be included in more detail in the site principles both in order to provide appropriate amenity for residents and to reduce the need to travel in an area where the traffic impact is going to be very challenging. Why is there no more detail in the site principles? Phase 2 should include areas of car free development with car club provision.</p> <p>One comment, noting the potential benefits of opening up the site to cross traffic of all modes, not just bus/cycle, in order to relieve congestion at Clarence Street/in front of York Hospital.</p>
ST1: Alternative boundary proposed	
No alternative boundary proposed	

SS16: Land at Tadcaster Road (ST31)			
Total respondents: 23	Support: 4	Objections: 14	Comments: 5
Key Issues Raised			
Support	<p>Gladman Developments support the identification of the Land at Tadcaster Road, Copmanthorpe as a strategic housing allocation. They state that it is supported by the local community through their neighbourhood plan and is available, achievable and deliverable. Attached documentation includes: Appendix 1: A Sustainable Future for Copmanthorpe: Assessing Housing Need and Vitality and Appendix 2: Land at Tadcaster Road, Copmanthorpe Development Statement.</p> <p>Small number of responses received in support of the scheme – those who commented in support raised the following issues: Development of the existing footpath from the railway crossing to the Farmer's Way area into a cycleway / paved footpath would give good access to the village centre; would support the provision of affordable housing; generally support more housing being built in the area.</p>		
Objection	<p>Whilst supporting the allocation, Gladman Developments also object to the wording of clause (ii) of Policy SS16 as the provision of open space prior to the commencement of development cannot be implemented. In order to deliver the openspace adjacent to the SSSI it would require the construction of the access road which would constitute commencement of development. The clause as it is currently written could therefore not be complied with. Also object to para 3.69 of the Local Plan as the Tadcaster Road, Copmanthorpe site is not located within the Tadcaster Road or Racecourse and Terry's Factory Conservation Area. This reference should therefore be deleted.</p> <p>Historic England recommends deletion of the site. The development could harm a number of elements which contribute to the special character and setting of the City. Site is perceived as being part of a swathe of open countryside south of the ring road; would impact on the relationship of Copmanthorpe with the City of York, in which the village is currently identifiable as a freestanding settlement; cumulative impact of P+R site at Askham Bar with proposed allocation would reduce the gap with the urban edge to less than 1km.</p> <p>Copmanthorpe Parish Council objects to the inclusion of the whole site ST31 (8.1ha) instead of the limited development proposed for this site in the emerging Copmanthorpe Neighbourhood Plan, using part of his land (3.0ha). Also, to maintain the current average housing density in the village, the density should be no more than 25 units per ha. This would result in 75 units as opposed to 158 in draft Local Plan.</p> <p>Both DPP obo Shepherd Homes and DPP obo Linden Homes strongly object to this allocation and recommend it s deletion; it goes against the Council's own historic character and setting evidence base. Development of this site will result in a greater level of harm to the purposes of including land in the Green Belt and other material consideration than comparable sites. The site is located on the entry to</p>		

	<p>the village and causes visual harm. Development of the site may result in harm to the SSSI due to the proximity of the location. The site is not well related to the urban area of Copmanthorpe and is a distance from the village services. Concerns are raised in relation to the standard of amenity with regard to noise levels in private gardens and air quality. ST13 would be better alternative site to ST31.</p> <p>PB Planning obo David Wilson Homes strongly objects to the allocation as it is considered that ST12 is comparatively a better site for development. This Site is known to have objections from Historic England in respect of historic character and setting as it is part of an area 'preventing coalescence' (parcel G3). Whilst the site is contained by physical boundaries these are not visual boundaries and therefore visual coalescence cannot be avoided. Potential impacts are also identified on the SSSI Askham Bogg. Site also scores worse in the Sustainability Appraisal (2017) on a number of objectives.</p> <p>General objections to the allocation include:</p> <ul style="list-style-type: none"> • Housing development takes up whole site of ST31 instead of part of land proposed by local Neighbourhood Plan (no more than 25 units per ha.); • impact on the character of the entrance to the village; • reference to Neighbourhood Plan comments re available development land and Historic England's objection to the site (O'Neill Assoc obo landowner) • disproportionate number of homes proposed in the village; • land is in the green belt • land has historic value - York Field is listed as a site of special interest on the proposed Copmanthorpe Heritage Trail. • Concerns that infrastructure is not sufficient to accommodate development (schools, road, services) • Proximity to Askham Bog nature reserve
<p>Comment</p>	<p>Highways England would not expect this to have a substantial individual impact on the operation of the A64. However, Highways England's previous modelling of Local Plan aspirations did identify capacity issues on the A64 west of York in future years. The developer should quantify the impact of the site on the junctions of the A64 with the A1036 and A1237 in the Transport Assessment. Highways England does not object to the scheme in principle, but requests the following addition to the list of key principles: <i>'Demonstrate that all transport issues have been addressed, in consultation with the Council and Highways England as necessary, to ensure that as many trips as possible are taken by sustainable travel modes and promote and facilitate modal shift from the car.'</i></p> <p>The Yorkshire Wildlife Trust notes the sites proximity to the reserve at Askham Bogg and SSSI. Pleased to see the intention within the policy to protect the SSSI. More clarity required at point ii. covering design of</p>

	<p>open space. Supports connecting up the GI corridor. The policy needs to cover the potential for damage and disturbance on the reserve from extra visitor pressure. Attached article in the CIEEM 'Human Impacts on Nature Reserves - The Influence of Nearby Settlements' (2017) by Fin Rylatt, Lauren Garside and Sara Robin analyses the damage and disturbance on Yorkshire Wildlife Trust reserves in relation to their proximity to development. This gives an idea of the problems on nature reserves which nearby developments can cause.</p> <p>The small number of comments received note potential for additional traffic, concerns around development density proposed and that the site may be 'unkind' to its eventual residents.</p>
ST31: Alternative boundary proposed	
No alternative boundary suggested	

SS17: Hungate (ST32)			
Total respondents: 2	Support: 1	Objections: 2	Comments: n/a
Key Issues Raised			
Support	Lichfields (on behalf of Hungate (York) Regeneration Ltd) support the allocation, which is a brownfield site and occupies a sustainable city centre location, delivering 328 dwellings over the remaining phases. This site can help support substantial levels of development and an appropriate mix of uses including many new homes.		
Objection	Lichfields (on behalf of Hungate (York) Regeneration Ltd) state that it is not clear which elements of the Hungate scheme the 328 dwellings relates to or how this figure has been calculated. Further clarification required on this matter to ensure that this figure is consistent with the consent and future proposals of the site. Scope should be explored to increase the potential of such sites to deliver even more new homes. It is not necessary for the plan to state that this must be delivered in accordance with the agreed site masterplan through existing outline and full planning consents. This is unnecessary and should be more flexible to allow for change in the future to respond to changes in policy and circumstances.		
Comment	No comments submitted		
ST32: Alternative boundary proposed			
No alternative boundary proposed			

SS18: Station Yard, Wheldrake (ST33)			
Total respondents: 65	Support: 7	Objections: 52	Comments: 10
Key Issues Raised			
Support	Historic England welcomes the requirement for development to		

	<p>conserve and enhance the special character and/or appearance of the conservation area.</p> <p>Quod on behalf of Vernon Land Partnerships supports for the allocation of ST33 within the Local Plan. Reconfirm the representations made in September 2016 (and enclosed as Appendix 1 to their response). Re-confirms 2016 response that the site is suitable, deliverable and viable with no insurmountable constraints to preclude development. There is a pressing need to review the Green Belt boundary in York to meet its OAHN. Site ST33 would make a significant contribution to this, whilst ensuring a permanence to the refined Green Belt beyond the plan period and a protection of the surrounding hinterland. The characteristics of Site ST33 ensure that it is the most appropriate and sustainable location in Wheldrake to deliver new residential development. The site has good accessibility to local services and transport routes and it can be suitably served and accessed in highway terms. It is entirely appropriate for residential development in this regard. Site ST33 can deliver an appropriate mix of residential and employment uses alongside publically accessibly open space, creating a sustainable community. It is available for delivery in the short term and can therefore meet housing need in this area in the early part of the plan period. In accordance with the NPPF the allocation will respond positively to the three strands of sustainability, notably the economic, social and environmental aspects.</p> <p>Several respondents support this site if housing in Wheldrake is essential, as is would be less intrusive than other potential plots. Housing development in villages are the only way young people can afford to stay in the villages they grew up in, as there is a shortage of houses in the village. Additionally, a development will lead to enhancements of the services for the village. However, investment is needed for supporting infrastructure - shops, healthcare, community centres etc. but school capacity is in particular need. Would like a cycle path from Broad Highway across the airfield into the back of Heslington. Suggests resurrecting the old Derwent Valley Light Railway for a tram route, it would be of great benefit to outlying villages.</p>
Objection	<p>A Wheldrake Ward Councillor states that the residents and Parish Council are wholly against ST33 as it currently stands. A previous planning application for part of that site was rejected for reasons of potential noise and other impacts associated with building residential properties near to an existing industrial estate. A large proportion of that site is located on good quality agricultural land and, therefore, it is considered that brown field sites should be explored instead of building on green fields. There is limited support for a small development of homes with the overflow being taken up by the 'garden village'. The school is oversubscribed with pupils from Wheldrake attending Elvington and Naburn schools as Escrick have now stated that they are unable to take any more children from outside of their own boundary. It would be difficult to extend capacity at Wheldrake school as in its current location it is bounded on all sides which is restrictive. The Doctors' surgery in</p>

Wheldrake is only open two half mornings per week and although there is a large new practice at Elvington unless patients have access to a vehicle it is not possible to use that facility.

Wheldrake Parish Council and villagers object to the size and scale of the proposed development as it is completely inappropriate for Wheldrake. The infrastructure is already at capacity. Also object to the scale of this proposed site as well as its proximity to the industrial estate. A planning application was refused for that part of ST33 nearest to the industrial estate for reasons of potential noise and other impacts. Significant proportion of the site is on good quality agricultural land and is currently recognised as Green Belt.

Julian Sturdy MP states that congestion on the A19 at rush hour is already a significant issue for villagers and 147 extra properties will exacerbate this. This concern must be addressed for Wheldrake residents to be convinced of the viability of this site at the current housing level. Also, has concerns regarding oversubscription in school places.

Stone Connection Ltd states that as a business based on the Industrial Estate they have serious reservations regarding the impact of this additional housing both on the village and the adjacent Industrial Estate where they are situated. They operate on a busy industrial estate where many of the businesses including ourselves receive regular van and articulated lorry deliveries throughout the day. Access is such that the Lorries often reverse into the industrial estate in order to gain access to the units. Currently in the main the only people on the Industrial Estate are the employees of the various businesses and visitors and they act with due care and attention when moving around the Industrial Site so lorries can operate in and out safely. It raises serious safety concerns if this area was to become a public thoroughfare. Goes into detail about safety concerns particularly around children being around the site, access issues, noise pollution, dust / air pollution, traffic, schools, public transport and provision of amenities in Wheldrake village.

Many other objections were received by individuals, based on the following key issues:

- Development is unacceptable in the Green Belt & open character of the area, and contrary to Green Belt policy. No very special circumstances exist to justify its development;
- Land is grade 2 & productive agricultural land;
- Residential development should be on brownfield, not Greenfield;
- Development is contrary to the Wheldrake Design Statement;
- Wheldrake is already over developed / too big;
- The proposed number of houses / density is too high, especially for a rural village;
- The school is at capacity and the impact of more development would be detrimental;
- There is only 1 shop in the village, which cannot cope with the extra

	<p>demand;</p> <ul style="list-style-type: none"> • The village pub could not cope with extra people; • The doctors / medical services in the area are over capacity; • Sewage would be an issue as there is already an issue there; • It would result in a loss of jobs / potential future jobs; • The development would have an adverse impact on local nature conservation; • The village infrastructure is insufficient to cope with the extra demand; • The village streets are narrow and the extra traffic would create unacceptable levels of congestion; • Existing public transport is very poor and would not cope with the extra pressure – would need great improvement; • The development would have a much wider impact on surrounding areas – esp. the Crockey Hill / A19 and A19 / A64 junctions. Cumulatively, impact of this development and other developments including those in the northern part of Selby District will create serious traffic / congestion issues; • The impact of the adjacent employment area will create amenity issues for residents of the development, such as noise / vibration etc; • Planning permission for housing already been refused at a planning inquiry;
<p>Comment</p>	<p>Highways England state that the potential impact of this site in combination with others on A64 junctions at Grimston Bar and at A19/Fulford Road need to be investigated, alongside appropriate mitigation.</p> <p>Yorkshire Wildlife Trust state that ST33 is close to the reserve at Wheldrake lngs. The Trust agrees with point iv that a comprehensive review of evidence with regard to biodiversity is required. Point vii need for a general recreation space and dog walking opportunities away from the nature reserve but within or accessible to the housing development.</p> <p>CPRE North Yorkshire state that development of this site remains a concern - it is considered the development of this site would limit the expansion of industrial activities at the existing employment site. And potentially restrict current businesses from expansion. Public transport, services and facilities are not considered adequate.</p> <p>Elvington Medical Practice states that their branch surgery at Wheldrake allows the elderly and people without transport access to primary care services, if more housing is to be built at Station Yard it is essential that Wheldrake surgery is improved to meet current standards and future need. There is no public transport between the villages of Elvington and Wheldrake. The recent application for development of Elvington surgery was rejected by the Vale of York CCG. Support and recognise the need for sheltered housing in the area but it is essential that funding is provided for development of the existing health care facilities.</p>

	<p>One person asked whether the development could be reduced to be of a more proportionate size of the current village.</p> <p>It was suggested that more affordable housing should be provided, for young people to remain in the village and facilities (e.g. the school) to have sufficient funding in order to expand to meet new demand.</p> <p>The policy mentions walking and driving but not cycling, racks should be provided by default.</p> <p>One representee was concerned that the condition stating that finance is available is not strong enough. Education facilities are critical for future expansion - would like the condition to be subject to a robust plan being submitted that demonstrates how local facilities will be expanded and one that has been agree in principle with local schools and LEA.</p> <p>Several individuals suggested that the development as proposed is too large for the village to support, a smaller development or extension of ST15 would be preferable. Building any houses would necessitate: expansion of primary school facilities, expansion of health services, improvement of drainage and sewerage system, vastly improved bus services and the creation of a cycle route into York.</p> <p>The proposed site at Station Yard is best option, though 147 buildings is too much and local traffic, schooling and doctors would struggle.</p>
ST33: Alternative boundary proposed	
No alternative boundary submitted	

SS19: Queen Elizabeth Barracks (ST35)			
Total respondents: 68	Support: 9	Objections: 31	Comments: 34
Key Issues Raised			
Support	<p>Highways England confirms that transport issues are covered satisfactorily in key principle xiv). The Transport Assessment will need to address the additional traffic generated by the development seeking to use Towthorpe Moor Lane to access the A64. When the scheme to upgrade the A64 in the vicinity of Hopgrove is brought forward in the future roads period, it may be possible to include design measures to mitigate this impact should the associated timescales fit.</p> <p>Along with a number of other residents, Strensall with Towthorpe Parish Council, whilst regretting the Government's decision to close Queen Elizabeth 2 Barracks (and Towthorpe Lines), supports the inclusion of the sites in the Plan as logical; the allocation is broadly supported. It is considered that 578 dwellings is more realistic than the 850 which had previously been informally mentioned. The development of this site as soon as the Army vacates it to prevent dereliction would be supported.</p>		

	<p>GVA on behalf of DIO (MOD) Estates supports the site coming forward for residential use. The disposal announcement provides a high degree of certainty of the sites availability for development; the site will be available from 2021. Technical evidence submitted in March 2017 underpins current allocation but further technical assessment of physical and policy constraints is ongoing which will inform masterplanning. Development of this site supports the Government’s agenda for the development of previously developed land. Location adjacent to Strensall Road, considered to be a high frequency transport routes, also means that the site could incorporate higher densities than assumed allocation. Potential cycle and pedestrian links only from the site via Scot Monteith Road. Existing accesses and leisure facilities will be used. Particular attention will be given to Strensall Common adjacent. <i>Note objection re site capacity below.</i></p> <p>CPRE - Inclusion of MOD site at Queen Elizabeth Barracks, Strensall and Imphal Barracks are welcomed and supported provided they are master planned appropriately incorporating sustainable travel opportunities and any ecological and biodiversity constraints carefully identified, assessed and mitigated accordingly. These sites safeguard against potential further green belt releases.</p> <p>Additional comments raised include:</p> <ul style="list-style-type: none"> • upgrading of the junctions from Strensall and Flaxton onto the A64 must take place so that traffic (both during construction and occupation) can be directed away from Strensall. Using the current road that links to the ring road (A1237) will only add further congestion. • New installations to deal with waste water and sewage must be provided as current provision is inadequate. • There are already major problems with parking in Strensall, new shops will be needed. • Improvements in bus services will be required, as will a cycle path to reduce the danger of travel into York by bike. • Potential for the scheme to deliver a new model settlement • Consideration could be given to providing a new village centre to the front of the development – village green, new school and amenities. • Reiterating previous comments made in the 2016 consultation: pleased at the reduction in green belt land being used and prioritisation of brownfield land. Particularly pleased at the removal of previously proposed sites for Strensall and Earswick.
<p>Objection</p>	<p>Natural England – Whilst NE support the inclusion of a bespoke policy, they have concerns relating to mitigation for the adjacent Strensall Common SAC. Given that further assessment is identified as being required with regards to the HRA, it is not considered that this site is likely to be deliverable which may affect the soundness of the plan. Advise that, should further HRA or other assessment suggest that this</p>

site is deliverable without adverse impact on the integrity of Strensall Common SAC, the requirements of SS19 should be updated in light of these findings. Keen to see detailed masterplanning detailing how urban edge and recreational pressures can be avoided.

Yorkshire Wildlife Trust objects to the allocation due to the lack of detail as to what the impacts are likely on the Strensall Common Special Area of Conservation (SAC). Concern over the increase of domestic pets and visitors on the Common. There are protected species on the Common. Hydrological impacts a concern. Raising or lowering the water table could affect the Common. The Trust supports the suggested policies to protect the SAC but not confident that there is enough information to make sure the impacts can be prevented. Alternative open space must be made available. They raise concerns that the plan could be found unsound without a final HRA screening showing no Likely Significant Effects, particularly in regard to site ST35 .

GVA on behalf of DIO Estates (MOD) – whilst supporting the allocation, it is considered that ST35 could have potentially a higher yield than allocated. Currently it is suggested that the site and Policy SS19 should allocate for a minimum of 588 dwellings. Site capacity will be reviewed in line with ongoing technical assessments of relevant physical and policy constraints. Also consider that H59 should form part of the overall strategic allocation to enable comprehensive approach to site delivery. Further, an alternative boundary is proposed to include part of the site currently excluded and within the Green Belt; a site plan is provided. It is considered that currently the boundary is illogical and the amendment would fit national policy regarding green belts creating a clear and defensible boundary to the site. It is not considered that this parcel contributes to the Green Belt. Further suggested policy changes include:

- Criteria i - assumes impact where there may be none and therefore should read *"assess potential impacts and minimise effects by..."*
- Criteria ii - "in perpetuity" is a significant commitment and should be removed at all points from policy. Revised proposed recreational routes to *"understanding of proposed access routes"*. Clarity is required to ensure that ecological mitigation and compensation measures relate to potential measures specific to the site and not Strensall Common SAC. Also wonder if the mitigation can be delivered prior to commencement of development.
- Criterion x - Existing openspace will contribute to provision but is not identified in Open spaces study update (2017)
- Consider that the supporting text to policy should not include reference to external advice from Historic England. Also that reference to archaeological assessment should be in support of a planning application.

PB Planning obo Barratt and David Wilson Homes - concerned with

inclusion of ST35 in relation to when and if the development comes forward. Unless uncertainty is resolved the quantum of homes on this site should be over and above the housing allocation identified. If not, possibility that Council will fail to demonstrate sufficient number of deliverable housing sites.

Johnson Mowat obo KCS Development Ltd/Vernon and Co/Yorvik Homes/ Redrow Homes and landowner/Linden Homes. - site is owned by MOD and is still operational. Whilst the MOD has expressed an intention to dispose of site, it is not immediate nor certain. There are significant challenges related to the SSSI which will affect the site's viability.

Turley representing Gallagher Estates - The Plan proposes the allocation of two existing Ministry of Defence sites located at Queen Elizabeth Barracks and Imphal Barracks. Until these sites are fully vacated by their existing users, they cannot be considered to be available. Relying on such sites to deliver the plan's housing requirements presents a significant risk insofar as there is also a prospect of the current operator deciding to retain its ownership and operation of the sites. This issue arose in respect of joint Cheltenham, Tewkesbury and Gloucester Core Strategy where the plan proposed the allocation of the Ministry of Defence's site at Ashchurch for 2,726 residential dwellings. During the Core Strategy Examination, the Ministry of Defence wrote to the Examination Inspector confirming its intention to retain a significant presence on the site, reducing the amount of housing it could accommodate to 550 units. This is not to say that these sites should not be treated as part of the potential supply of housing land, rather their inclusion and the extent to which they are relied upon to meet the City's housing requirements should be approached with caution.

York Green Party have serious concerns about impacts on Strensall Common.

York Environment Forum does not consider this site should be included as an allocation as release dates are problematic and subject to government policy changes.

York TUC objects to the allocation of the use of the Army Barracks in the Plan for housing needs. The Plan should stick to the Council's policy to oppose the closure and protect around 1600 existing jobs.

Other objections raised include:

- Impact on green belt
- Site access - safety on the access road to the works which is narrow and single track, and used as a public footpath which leads to a wildlife reserve and Strensall Common. Principal

	<p>access to site should be from Towthorpe Moor Lane not Strensall Road.</p> <ul style="list-style-type: none"> • Severe traffic congestion and parking problems will worsen • Impact on the adjacent SSSI • sewerage system will struggle.. Road infrastructure should be improved prior to commencement of development; • failure to take responsibility for snickets and areas left by builders, • lack of amenities/services (library, overcrowded schools and poor public transport are mentioned) • little local employment, causing people to travel out from Haxby to work; • poor affordability and lack of appropriate housing mix - Strensall has a high proportion of elderly residents and young people who find difficulty getting suitable housing. The cost to developers on brownfield sites will not make it viable and therefore the likelihood of affordable housing (40%) not deliverable. • issues with ORR (A1237) - without dualling the northern ring road and providing further access roads to the ringroad, plans north of Haxby will simply result in gridlock/congestion/pollution • respect to historical ridge and furrow medieval fields of Crooklands lane. • Walbutts treatment works at Strensall is already at full capacity and having issues with discharging pollutants into the River Foss.
<p>Comment</p>	<p>Network Rail has no objections to the principle of the allocation however a transport assessment should support the application that looks at any likely increase in the use of the level crossing in Strensall</p> <p>Historic England has no objection to the principle of development, however the site is part of long military associations with the City. Policy must ensure the significance of the area, of any buildings and open spaces on site would influence proposed new development. Suggests alternative wording as follows re policy SS19, criterion v: <i>“The development of this area must be informed by an assessment of architectural interest of the site and its buildings. Those buildings which are considered to be of historic interest should be retained and reused;</i> Policy SS19, criterion vi: <i>“...identity and character that in its layout and spaces, reflects the site’s long use as a barracks, its landscape context...”</i></p> <p>Earswick Parish Council notes that the proposed development of the army barracks at Strensall would inevitably lead to a considerable increase in the volume of traffic passing through Earswick village. The Parish Council are prepared to work closely with the City of York Council and potential developers to identify measures to mitigate against any such increase in traffic flows.</p> <p>Julian Sturdy MP recognises the potential benefits of this large</p>

predominantly brownfield site in helping to meet York's future housing need, but that these benefits will only pay dividends if the necessary facilities and infrastructure can be secured. Further issues raised:

- notes that population growth in Strensall and the surrounding area over the past few decades has not been supported by significant improvements to road infrastructure and local facilities. This is extremely important to consider in the context of the proposed 578 dwellings at the site. Residents concerns about unincreased traffic on Strensall Road at the Towthorpe junction must be considered when deciding on access to the development. Scott Moncrieff Road is being considered as a major access point to the development. This would likely create further traffic issues in Strensall given the scale of the site.
- Welcomes the proposal for a new primary school , to support residents of the development.
- Key principle ix indicates 'further work regarding drainage of the site'. He expects extensive investigatory work to take place into the potential impact of the additional 578 properties at Site ST35 on the drainage system at Walbutts Farm, and appropriate action taken.
- Local amenity must be protected, particularly the mature trees from the Strensall Road and Towthorpe junction into the village.

Strensall with Towthorpe Neighbourhood Plan Steering Group (and other residents writing in support of their views) make a number of suggested comments/alterations, including:

- request urgent site visit between CYC, the MOD and Historic England re safeguarding buildings worthy of preservation;
- The steering group would like to see a master plan produced for the site as soon as possible. This requirement should be included in policy SS19.
- Site ST35 and the explanations 3.77 and 3.83 are broadly supported with the following exceptions:
 - clause 'xiii' - minimal effect of upgrading the existing highway between the barracks and Towthorpe Moor Lane would provide an alternate route from the development to the A64 at Hazelbush crossroads. Take issue with the implication that Towthorpe Moor Lane should not be the principal route for access & egress from the A64. Consider it to be essential to prevent further congestion on Strensall Road and the A1237. A major junction improvement at the A64/Towthorpe Moor Lane junction is absolutely necessary to the success of this development - this is to allow traffic from Strensall Rd to access the A64 quickly and safely without using the A1237 junction - and to reduce the risk of further accidents. Agree that no access to the site should be from the northern section of Scott Moncrief Rd (the first 2 sentences of clause 'xiii' are supported, to protect the amenity of Strensall Common

	<p>SSSI/SAC). Does not agree with officers suggestion that the southern area of Scott Moncrief Rd, connecting the Queen Elizabeth 2 Barracks site to Towthorpe Lines should not be improved. The access being taken off the northern part of Scott Moncrief Rd is strongly opposed (to protect the amenity of Strensall Common SSSI/SAC).</p> <ul style="list-style-type: none"> - clause ix' does not fully address the issues concerning foul sewage and the obsolescence of the existing Severn Trent facility. • The intention to fully protect Strensall Common SSSI/SAC is supported & a full Ecological Assessment to be carried out first (Clauses 'i-iii' are supported, as these are critical in protecting the SSSI/SAC). • Clause 'vii' (retain as many trees as possible) is supported. • Clause x refers to open space available within the barracks site and the steering group are aware that there are insufficient sports facilities within the parish and would like to see the existing facilities retained and enhanced. The high proportion of public open space on the site (40%) is welcomed - to protect the current open feel of the site and provide much needed play/leisure areas in the village. • The intention to allocate a new school is supported (an existing building on site may be suitable for conversion to a school) and more retail on site is also supported - Clause 'xi/xii are supported to achieve these aims. • Support clause xiv as all the quoted developments will mean increased road traffic, although it does not specifically address the need to address potential issues at the A64/Towthorpe Moor Lane junction. • Support clause xv as there have been a number of collisions at this junction. • The existing cycle link to the City is unsafe and a dedicated off road cycle track is requested, which runs along Strensall Road, using developer contributions (Clause 'xvi' is supported); • Support clause xvii as the noise from the firing range is very noticeable throughout the parish. • The retention of the Military identity is welcomed (inc screening existing buildings to see if worth designating & retaining - para 3.77 & 3.78). The conversion of some buildings to a care home or hotel may be suitable. • The suggestion that a completely new drainage system is required is supported. • Future management of Strensall Common must be confirmed
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before any development is permitted. Parliament will need to amend or repeal the Strensall Common Act 1884 before any development takes place (it may also be necessary to ensure that the development limit of 250 acres is not exceeded, unless the Act is amended).

Strensall Ward Cllr Paul Doughty notes the significant growth in Strensall in the past 25 years, and the implications of this on village facilities/infrastructure. Whilst accepting of the use of pre-developed land in preference to green belt, he raises the following concerns:

- The main village street becomes extremely congested and more traffic would be unsustainable. Access to the site from Towthorpe Moor Lane to mitigate some traffic away from the village;
- There is much concern that Scott Moncrieff Road would be used as the main access point to the QEB development. This is not a solution and would force more traffic through Strensall and down Ox Carr Lane.
- The draft plan indicates there may be a potential rail halt in Haxby - there may be value in providing a P&R style rail halt between Haxby and Strensall which may alleviate parking issues in the villages and encourage a viable bus service. There are no major employers in the village so car borne commuting is inevitable.
- Compensatory amenity provision is required: assuming the site is adopted a second primary school is imperative; supporting facilities including grocers/cafe/open space, sports facilities, appropriate drainage and sewerage; It is essential a safe cycle path to link Strensall through Earswick to Huntington is also provided.
- affordable housing at an appropriate percentage of new homes;

The Education and Skills Funding Agency acknowledges the need for additional school places at the site; its proposals for forward funding schools in large residential developments may be of interest.

Johnson Mowat obo Taylor Wimpey - the site will face challenges in coming forward such as the SSSI. Considering the ecology and provision of a school/shop will impact on viability of the site.

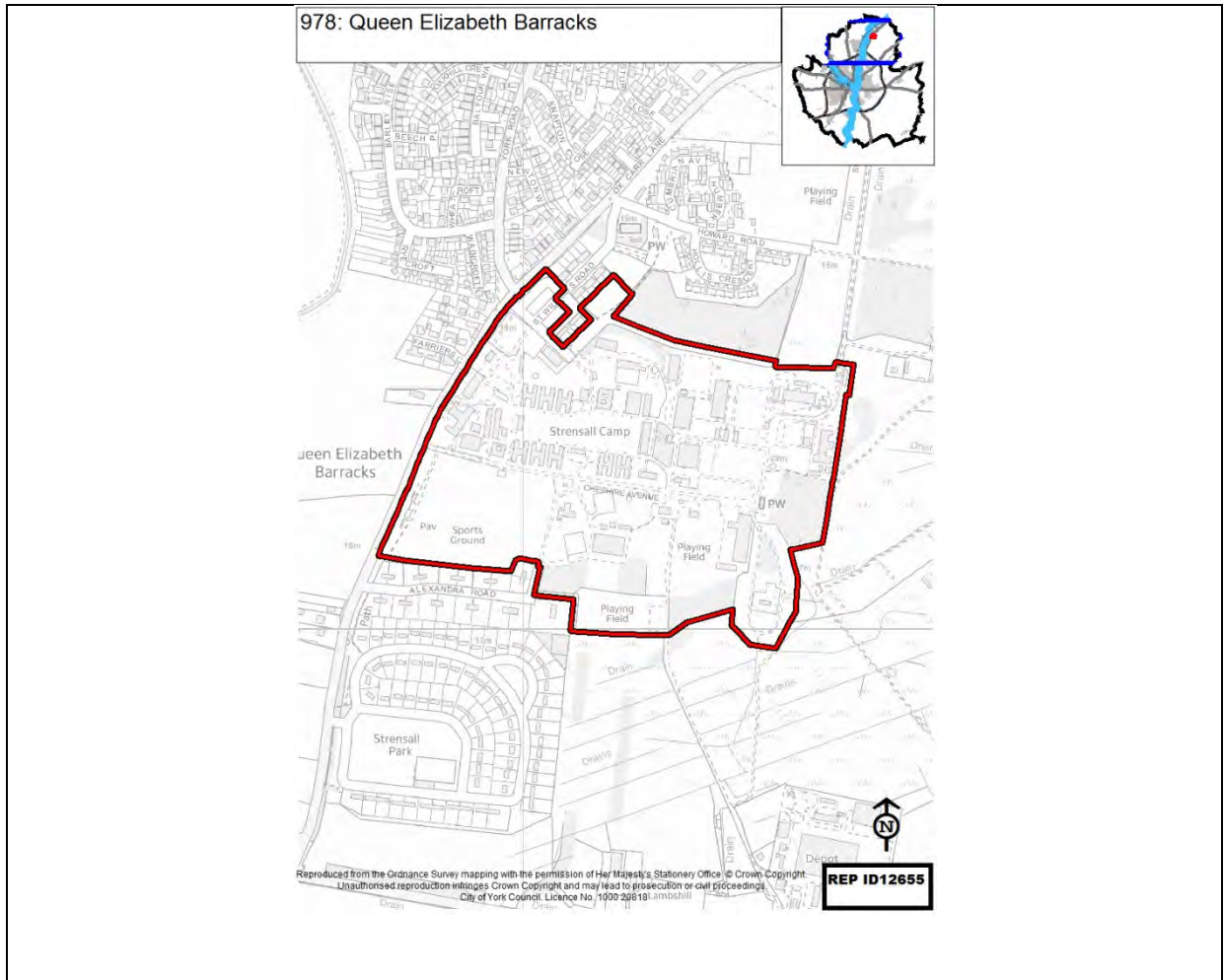
Other comments received include:

- Sites are not yet available for development/deliverable (PB Planning obo landowner)
- Potential to link the site to the railway/new station?

- Queries stated delivery of affordable homes
- Necessary improvements to Strensall Road, including the potential to change crossroads at Strensall to York Road at Towthorpe to a roundabout to combat traffic;
- Provision of an off-road cycle path along Strensall Road from Strensall to the A1237 Ring Road would be of great benefit to this site and adjacent settlements, and installation of such a route should also incorporate appropriate pedestrian / cycle underpass at that roundabout.
- Infrastructure capacity concerns: schools, drainage, sewerage, traffic
- Loss of village feel
- Strensall Common's conservation should be a priority
- The Council should be petitioning to save the site rather than planning housing on it
- St Mary's Church, Strensall note that the document does not refer to the specific use of St Wilfred's Church, which is a community asset in Strensall and should remain as such. It should be possible to liaise with the army to secure its future use as a church / community asset

ST35: Alternative boundary proposed

An alternative boundary is proposed to include part of the site currently excluded and within the Green Belt; a site plan is provided. It is considered that currently the boundary is illogical and the amendment would fit national policy regarding green belts creating a clear and defensible boundary to the site. It is not considered that this parcel contributes to the Green Belt.



SS20: Impfal Barracks (ST36)

Total respondents: 44 **Support: 7** **Objections: 28** **Comments: 15**

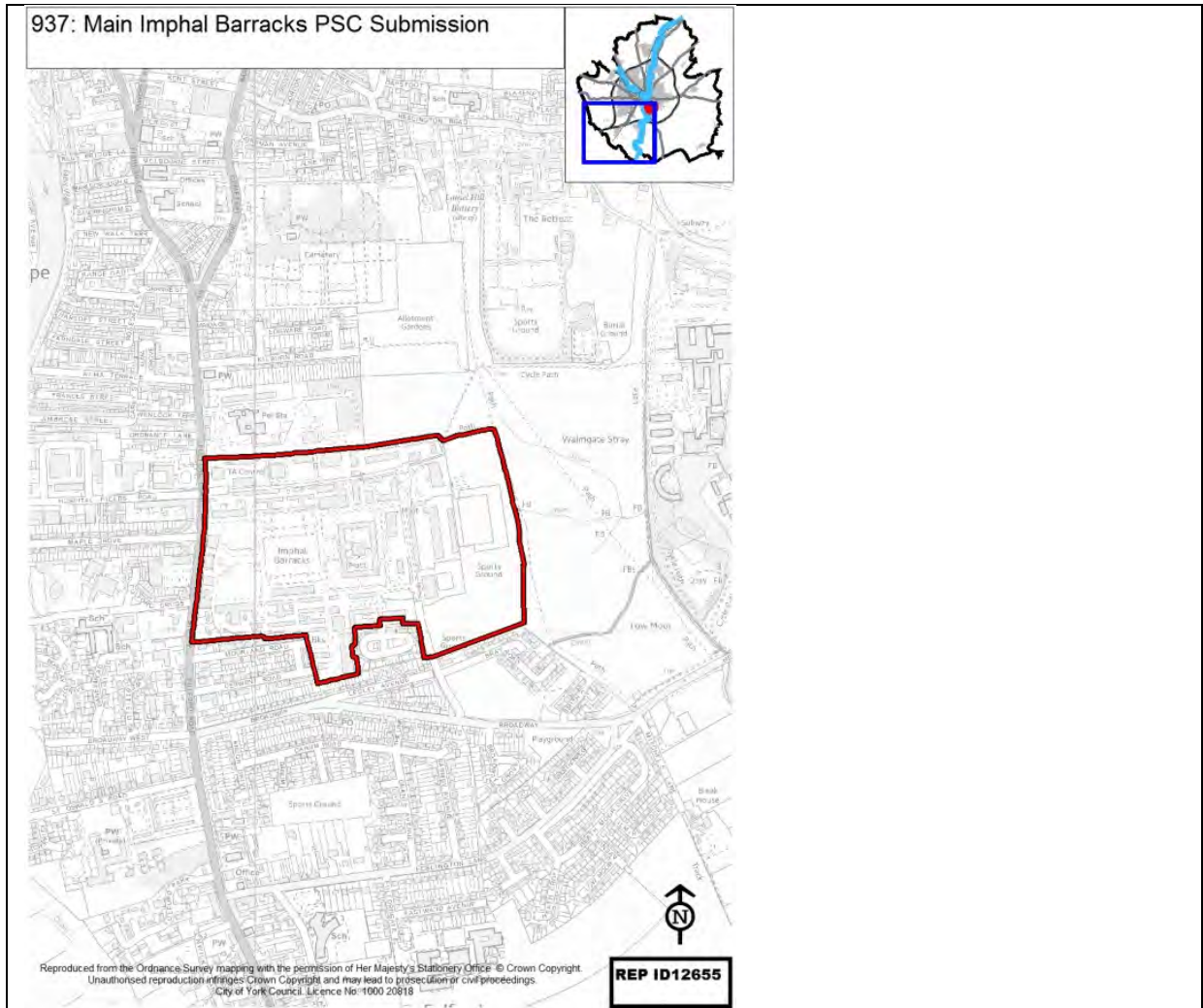
Key Issues Raised

Support	<p>Highways England states that the transport issues are covered well, which need careful consideration due to congestion of very busy roads in area (Fulford Road, A19, A64). Need sustainable options.</p> <p>Yorkshire Wildlife Trust support protection of Walmgate Stray and ensuring future grazing of grassland.</p> <p>Suggests additional transport links and improved cycle and pedestrian tracks.</p> <p>GVA on behalf of DIO Estates (MOD) supports site for residential use, with open space. Careful design an enhanced landscaping on the eastern boundary will mitigate any impact upon Walmgate Stray.</p> <p>Need for quality affordable housing in York.</p>
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	<p>Supports use of brownfield sites.</p> <p>Close to city centre.</p> <p>Ecological and biodiversity constraints need top be considered.</p> <p>CPRE - North Yorkshire supports site.</p>
<p>Objection</p>	<p>Fulford Parish council suggests the following amendments:</p> <ol style="list-style-type: none"> 1) Criterion i) should be reworded so that the developer must demonstrate that all transport issues have been resolved and not just addressed so the impacts on the local highway network are not severe. 2) Criterion iii) should be strengthened so that the significant features of the site’s historic environment are retained and enhanced. 3) Criterion x) should be strengthened to ensure that existing recreational facilities and areas of open space are retained and made available for community use including the playing fields adjacent to Walmgate Stray. 4) A new criterion should be added which would ensure that the environmental impacts associated with the traffic generation of the proposal are fully addressed and mitigated. <p>York Travellers Trust highlight that Policy H5 states that large housing sites are required to make provision for Gypsy and Travellers, this is not mentioned in this sites policy.</p> <p>York Green Party objects to the site due to proximity to Walmgate Stray and Conservation area. There will be a negative impact on the stray due to increased dog walkers. No clear mitigation is mentioned.</p> <p>Should be identified as mixed use to reflect its current employment and provide accommodation for army personnel.</p> <p>New development should look at sustainable travel options due to A19 being above capacity and it being a AQMA – suggests a long term strategy for public transport and rail links.</p> <p>Concerned about traffic on Fulford Road.</p> <p>Concerned about safety of children walking and cycling to school.</p> <p>Loss of architectural heritage. Site should remain army barracks due to being a strategic site since roman times.</p>

	<p>Several developers state that although the MOD have expressed intention to dispose of site, it is not immediate or certain, so development won't begin till 2033. Will fail to deliver houses in the planning period.</p> <p>A respondent states that 769 units underestimates potential yield on site.</p> <p>GVA on behalf of DIO Estates (MOD) argue that the Habitat Regulation Assessment is wrong – Walmgate Stray is not a SAC or SSSI and therefore not subject to HRA.</p> <p>GVA on behalf of DIO Estates (MOD) suggests extending site to proposed alternative site where the green belt to the east is included, which would ensure an enduring green belt boundary.</p> <p>Disagrees that site is sustainable due to reduced accessibility to public transport, and not being near any large supermarkets.</p>
Comment	<p>Historic England suggests policy wording: deleted Policy SS2-, criterion iii, and replace with: <i>"The development of this area must be informed by an assessment of architectural and historic interest of the site and its buildings. Those buildings which are considered to be of historic interest should be retained and reused.";</i> iv <i>"The parade ground and other open area which are important to the understanding of the site and its buildings should be retained as open spaces in any development.";</i> v <i>"If, following the City Council's review of the architectural and historic interest of this site, Imphal Barracks is included within the Fulford Road Conservation Area, development proposals would be required to preserve or enhance those elements which have been identified as making a positive contribution to its significance."</i></p> <p>Highways England highlight the potential transport impact of site on the SRN.</p> <p>Suggest part of sit should be car free with enhanced cycle and pedestrian connections to city.</p> <p>Fulford Conservation Area's boundaries may reconsider to include this area.</p> <p>Design should reflect local military history and be in keeping with the conservation area and Walmgate Stray.</p> <p>Julian Sturdy MP states that the benefits of brownfield sites will only pay dividends if the necessary facilities and infrastructure can be secured.</p> <p>Cycle track across Walmgate Stray should be brought round to join</p>

	<p>Fulford Road South.</p> <p>GVA on behalf of DIO Estates (MOD) state that existing openspace will contribute to provision but is not identified in Openspaces study update (2017).</p> <p>Site should be saved for historical importance.</p> <p>PB Planning on behalf of a landowner argue that the delayed time in selling of the site will mean the short term need for housing will not be satisfied.</p> <p>Should have a mix of housing on site so residents do not have to travel for work, shopping and leisure, otherwise unemployment may increase.</p> <p>Efforts to preserve green space and trees appreciated.</p>
ST36: Alternative boundary proposed	
<p>GVA obo DIO Estates (MOD) - An alternative boundary (previously submitted at Preferred sites consultation) is proposed to include part of the site currently excluded and within the Green Belt to the east; a site plan is provided. It is considered that a revision to the boundary to extend the site would facilitate an enduring Green Belt boundary enduring beyond the plan period. It is considered that this parcel makes a limited contribution to the Green Belt.</p>	



SS21: Land south of Elvington Airfield Business Park (ST26)			
Total respondents:	30	Support: 10	Objections: 14
Comments:		9	
Key Issues Raised			
Support	<p>Julian Sturdy MP supports B1 and B8 units for light industry as they reflect the rural nature of nearby villages.</p> <p>Elvington Parish Council support the extension proposed but stress the need for detailed archaeological and ecological assessments.</p> <p>Wheldrake Ward Councillor (Cllr Mercer) largely supports development, echoes Elvington Parish Council comments.</p> <p>William Birch & Sons support allocation of land for employment in this location.</p> <p>Six members of the public support the development as it will bring jobs to the area but for half this support was conditional upon a 7.5 tonne weight limit being imposed on Main Street. Others mentioned the importance of B1/B8 restrictions and protecting wildlife in the context of</p>		

	their support.
Objection	<p>Majority of the objections from members of the public are related to HGV traffic (thirteen) due to impacts on quality of life, road safety, congestion and pollution. One mentions shortage of school places and another also mentions protecting habitats for wildlife.</p> <p>William Birch & Sons support expansion of ST26 with an alternative boundary previously submitted to help meet future employment demand.</p> <p>William Birch & Sons comment on many of the criteria in policy SS21, re criteria ii – there are no historic field boundaries within the site allocation, especially given changes that have been made in the last 20 years. This should be removed, criteria iii, undertaking landscape work to mitigate visual impact is more appropriate. Criterion iv – fundamentally misunderstands the volume and nature of the traffic to be generated as this will be flowing in the opposite direction to peak morning flows. Asks what work is being done to consider cumulative impacts and co-ordinate all junction improvements. Criterion v – this needs to appreciate the nature of existing businesses and those likely to occupy the expansion, they are attracted by the location's access to the highways network and the lack of sensitive receptors in the immediate area meaning they are able to operate unconstrained (in terms of light and noise pollution) 24/7. It is therefore concerning that criterion v suggests there may be restrictions in future that would make the Business Park unattractive to exactly the type of businesses it wishes to attract. Unclear as to why reference is made to air quality and there is no commentary within the explanation to aid understanding. Any emissions from development would be the subject of a license or permit from either the Council or Environment Agency to ensure they are within reasonable limits, so do not understand the need for any additional consideration. Regarding criterion vii, preliminary investigations and design of a drainage system have been undertaken; the intention is to direct surface water towards the south and the River Derwent. This is instead of taking drainage north through the village of Elvington. It is therefore considered that surface water drainage can be addressed satisfactorily and is not an issue. Technical, environmental and landscape information submitted previously establishes how the land is suitable, available and developable.</p>
Comment	<p>Northern Power Grid stress there may be need for network reinforcement for connections to the site but there is not enough detail provided at this stage in the planning process. Recommends developers submit an application for connection to Northern Power Grid as soon as they have detail of site location and electrical capacity requirements so a quote for the connection can be provided along with details of any reinforcement and/or diversion works that may be required.</p> <p>Elvington Parish Council stress that units should be small, high value businesses consistent with a restriction to B1 and B8 use, as at present, and in line with CYC's economic strategy. A gap should be made</p>

between the existing and new estates to allow for a wildlife corridor. The Parish Council's support is conditional on the imposition of a 7.5 tonne weight limit on Main Street.

Kexby Parish Council stress HGVs should not be permitted to access the B1228, as the road is unsuitable. HGVs should access the A64 via the proposed link road and onto the A1079, rather than using the B1228 to access the A1079.

Highways England would not expect development to have a substantial individual impact on the A64 but expect it to combine with other strategic sites to have a cumulative impact on the operation of the A64, A166 and A1079 at Grimston Bar.

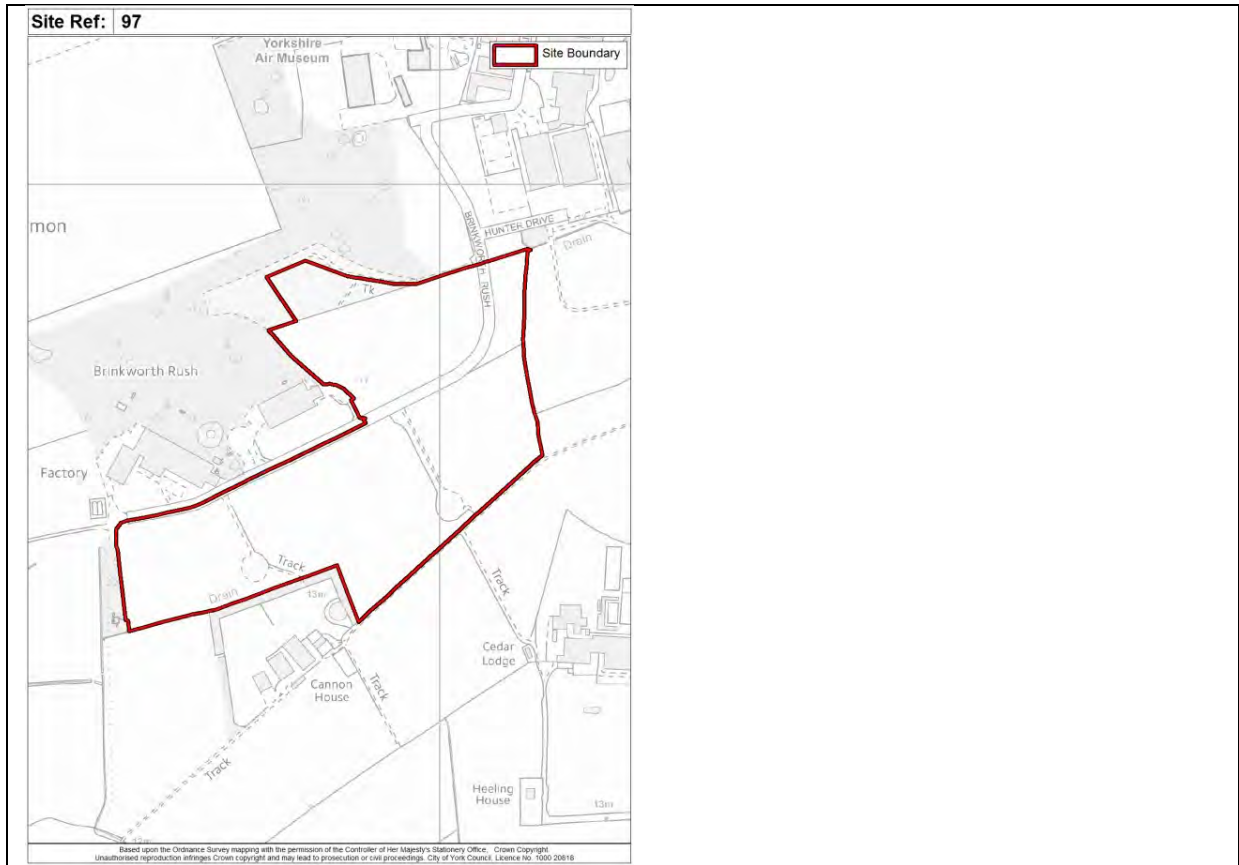
William Birch & Sons believe the site has capacity beyond the current allocation under policy SS21.

Julian Sturdy MP comments that community representatives generally support the extension, but believe an archaeological assessment should take place before development. Due to existing traffic through the village, particularly on Main Street, a weight limit should be considered.

Four members of the public also commented in support of a weight limit or restriction / diversion of HGV traffic around the village. A majority of these comments also mention the importance of protecting habitats for wildlife.

ST26: Alternative boundary proposed

Support for the alternative boundary previously submitted through the Preferred Sites Consultation (2016) as an expansion to the ST26 allocation.



SS22: University of York Expansion (ST27)

Total respondents: 20 Support: 4 Objections: 11 Comments: 9

Key Issues Raised

Support	<p>Highways England support, transport issues are covered satisfactorily in key principle (vii). HE welcomes the statement in Para. 7.11 that Site ST27 will be accessed via Hull Road via Campus East. HE's agreement in principle to the provision of a new junction on the A64 to serve site ST15 Land West of Elvington Lane is conditional on there being no access from the A64 northwards towards Campus East.</p> <p>University of York support the principle of allocation for expansion primarily for residential colleges, academic buildings, knowledge based businesses and car parking/infrastructure. Support for employment allocation to meet knowledge-led businesses demand. Support for the site to have restrictions in relation to obligations on the university to encourage student living on campus.</p> <p>Two members of the public expressed support for the allocation, one welcomed development allocation being moved away from the village but still stressed the importance of protecting Heslington from traffic and student thoroughfare</p>
Objection	<p>Historic England object as development so close to the A64 will change the relationship the southern edge of York has with surrounding countryside; it will also alter the perception of the setting of York and the</p>

relationship to surrounding villages.

Fulford Parish Council object, noting that the costs of expansion (HMOs, parking, congestion etc.) fall disproportionately on local communities in Heslington, Badger Hill and Fulford. The four policies proposed to deal with the university SS22, ED1, ED2 & ED3 should be rationalised as they duplicate each other and set out similar objectives in slightly different ways. Development would bring large-scale development almost completely up to the A64, replicating the type of harm already seen at Clifton Moor. This would conflict with at least three of the purposes of the Green Belt as set out in NPPF paragraph 80. The site of Proposal ST27 was not intended to be developed by the University when it sought planning permission for Heslington East; instead the site was shown as part of the green buffer around the site. The proposed allocation is for “B1b knowledge businesses” rather than to meet any need identified for further university uses which cannot be accommodated on the existing two campuses, no substantial case has been made which demonstrates a need for further land for knowledge-based businesses beyond that allowed by the 2006 Secretary of State permission. Even if there is such a need, FPC considers that sites would not have to be immediately adjacent to the University. If ST27 is retained, the following alterations should be made: 1) Criterion iv) should be altered to omit “which is clearly evidence in terms of demand” as it is ambiguous in meaning. 2) Criterion v) should be strengthened. High quality sustainable transport is vital to reduce congestion on the local road network and impacts on nearby communities. To ensure this, FPC considers the criterion should be reworded as follows: Deliver high quality frequent and accessible public transport to York City Centre and elsewhere including Campus West. Any proposal must demonstrate that such measures will enable upwards of 15% of trips to be undertaken using public transport. Monitoring and delivery arrangements will be required in a Section 106 Undertaking to ensure that this policy objective is secured in practice. 3) Criterion vii) should be revised so that it applies the stronger NPPF paragraph 32 test as follows: Demonstrate that all transport issues have been resolved, in consultation with the Council and Highways England as necessary, so that the residual cumulative impacts on the surrounding highway network are not severe. The cumulative impact of the proposal with other proposals to the south-east of York, including ST4 and ST15, should be addressed. 4) Criterion viii) should be either deleted or strengthened. FPC is opposed in principle to a new access onto the A64 because of its harmful impacts on the environment (see below). However if it is to be provided, it is important that ST27 (and the rest of Campus East) makes use of it to benefit local roads. 5) A new criterion should be added so that only businesses linked to the university should be allowed on the site. Otherwise there is a danger that the site is rapidly developed for businesses not genuinely requiring a location adjacent to the university and a case is made in the future for the release of another similar site. FPC suggests the following: Demonstrate that only knowledge-based businesses genuinely requiring a location on or immediately adjacent to the University campus are

allowed to occupy premises on the site.

Heslington Parish Council object, development will lead to loss of agricultural land and will disrupt the setting of the campus lake and Heslington village. If this allocation were to be approved then its use and access must be conditioned so that: There should be no direct vehicular or pedestrian access from the site, when developed, into the village other than via Field Lane. If access from a new road from ST15 connects with ST27 Campus East then no “rat run” opportunity should be available that allows traffic through to Heslington village. The Local Plan should stipulate that the land can only be developed for the university’s own academic purposes, and not be designated as general development land. All existing public routes and Rights of Way should be retained in any completed development.

University of York’s main objection relates to the policies which strongly support the University’s continued expansion but are not translated into adequate land allocation for expansion. The 14ha of development space proposed for the next 20 years will not provide the security which the university needs for long term planning and therefore will not meet the Council’s own policies on growth of the University and expansion of the York economy. Taking into consideration space planning it is considered that 23.8 ha of developable land are required to 2032/22 and 28 ha to 2038 to allow for green belt permanence (2014 boundary with landscape buffer). Current allocation therefore hinders ability to respond to future requirements and need. The policy should reference knowledge based business in addition to other higher education and related uses. Object to the boundary proposed in 2017 (Option 2 referred to in response) as they consider that this would require an internal buffer to the A64 (5.5ha) and therefore only allow a 14 ha of developable land. This is likely to put pressure on the Green Belt boundaries in the long-term by inadequately allocating land for the University in the long-term; this would meet 50% of development needs. The three alternative boundaries suggested show that there is little difference between the sites in terms of visual effects. Principally the campus will be seen from the south east although the 64 corridor acts as a visual barrier.

Accepted that there will be significant change in landscape character at Heslington East from open agricultural land to areas of large scale built development. Considered that this would have a weaker relationship to campus given only part developed on the south eastern part of the lake. Western edge includes 2ha of land outside of university control. Would mean smaller scale development with only one area of open space - limited parkland setting. Detailed landscape principles are recommended.

University of York object to the disparity between the existing planning permission on campus east for up to 25ha of employment floorspace (likely to be 5.75ha / 57,500 sqm single storey) to 21,500 sqm (equating to 2.33 to 3.16 ha) in policy SS22 and ED3. The policy needs to be altered to clarify that the existing permitted 25 ha of business at 23%

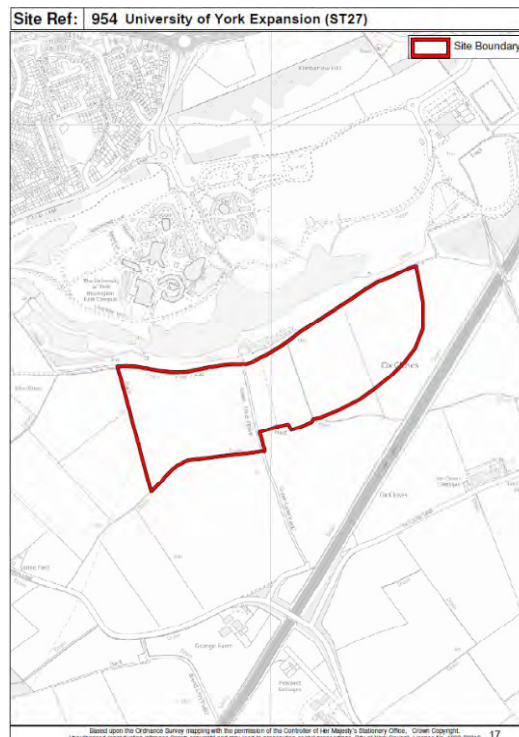
	<p>footprint on campus East stands plus 21,5000 sqm at the extension. Wording suggested that with agreement of the Council, the University can restrict the B1b provision on Campus East, in order to make equivalent provision on the extension, to a total of 25 ha across both sites. This could facilitate a cluster of knowledge- led businesses taking advantage of A64 location. The contradiction between ED3 and EC1 needs to be clarified to allow the campus extension. Several members of the public objected, mainly due to the development on green space obstructing or ruining views, disrupting the setting of York and concerns about traffic through Heslington.</p>
Comment	<p>Highways England stress that it will be essential for an assessment to be made of the traffic impact of the site both individually and cumulatively with site ST15 in a Transport Assessment.</p> <p>Northern Power Grid stress there may be need for network reinforcement for connections to the site but there is not enough detail provided at this stage in the planning process. Recommends developers submit an application for connection to Northern Power Grid as soon as they have detail of site location and electrical capacity requirements so a quote for the connection can be provided along with details of any reinforcement and/or diversion works that may be required.</p> <p>University of York mention the importance of the University to York's economy and detail recent expansion and plans for the future. Changes to government funding have resulted in the university planning more specifically for the future. Key to size are growing departments, growth in international foundation programmes for internal students and growing long distance learning. Projected need for the future for student accommodation includes 2 colleges in the short-term and 3 more in the long-term to 2032; extra 3 colleges cannot be accommodated on existing campus. Employment use buildings such as The Catalyst need car parking within close proximity. Access from the A64 in conjunction with ST15 may be attractive for business users. Principally the campus will be seen from the south east although the 64 corridor acts as a visual barrier. Accepted that there will be significant change in landscape character at Heslington East from open agricultural land to areas of large scale built development as per the Campus East. Confident that car parking across Campus East and the new extension will be accommodated within the existing planning permission as only 27% of maximum of current permission provided. Supportive of connectivity to the A64 alongside ST15. No vehicle access proposed through Heslington.</p> <p>Heslington Village Trust movement of the site away from the village is welcome but as with ST15 the village must be protected from both vehicular traffic and students coming through the village. Any new access from ST15 must run closely adjacent to the A64 to minimise harmful impacts on open farmland and views to / from Heslington.</p> <p>York Ramblers note that at the eastern edge of the site there is an outer</p>

urban footpath link from Hopgrove to Esrick. They would appreciate maintaining a green way alongside the site rather than a path along boundary buildings, same applies to Green Lane which leads down to Grange Farm. There should certainly be a green buffer and trees to screen the development somewhat from the A64, agree that the 23% footprint should include car parking and access roads.

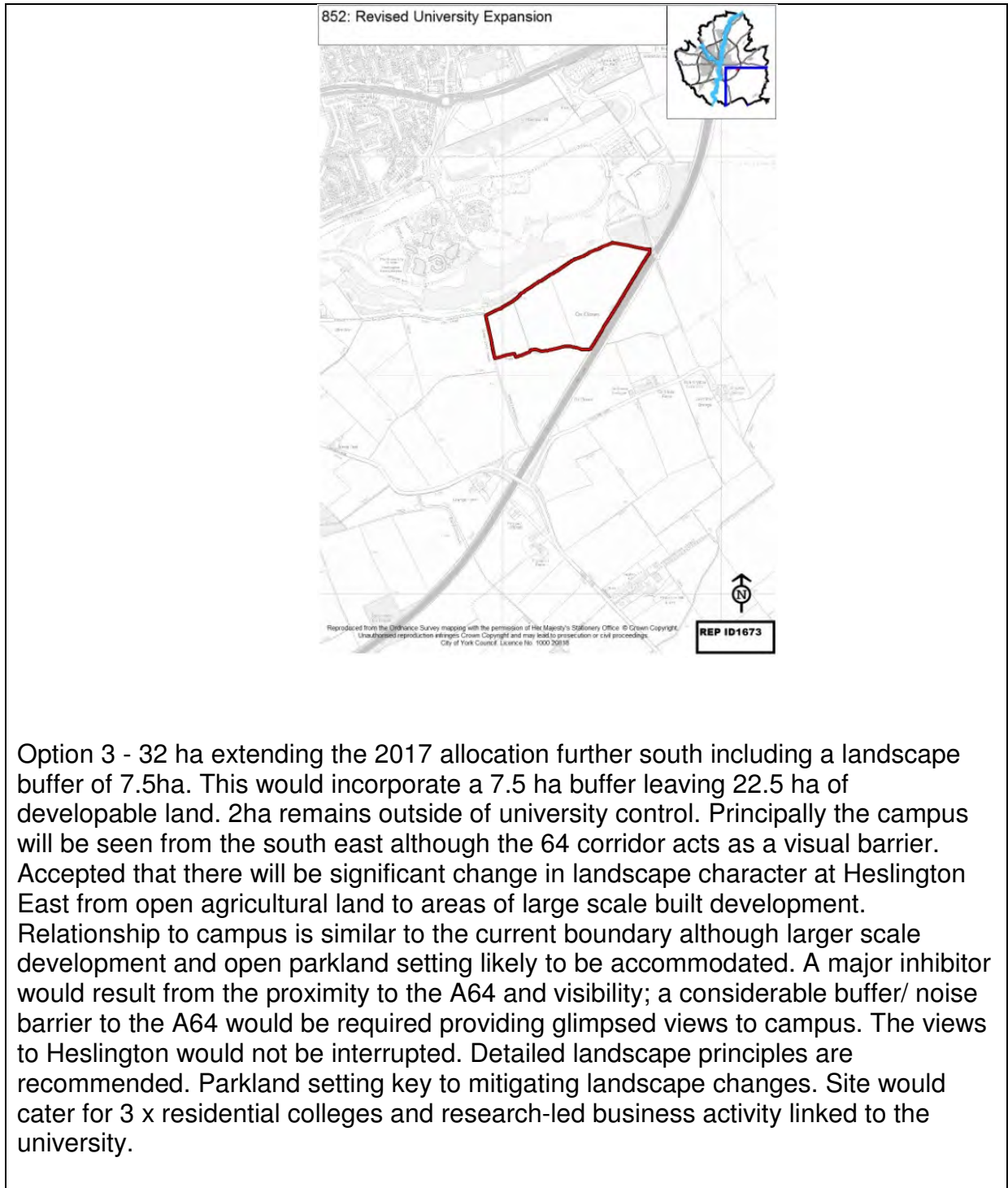
Three comments from members of the public are all concerned with access to the site, one supporting direct access to the A64, another asking how traffic through Heslington will be restricted and the final one asking how the site will be accessed from Hull Road.

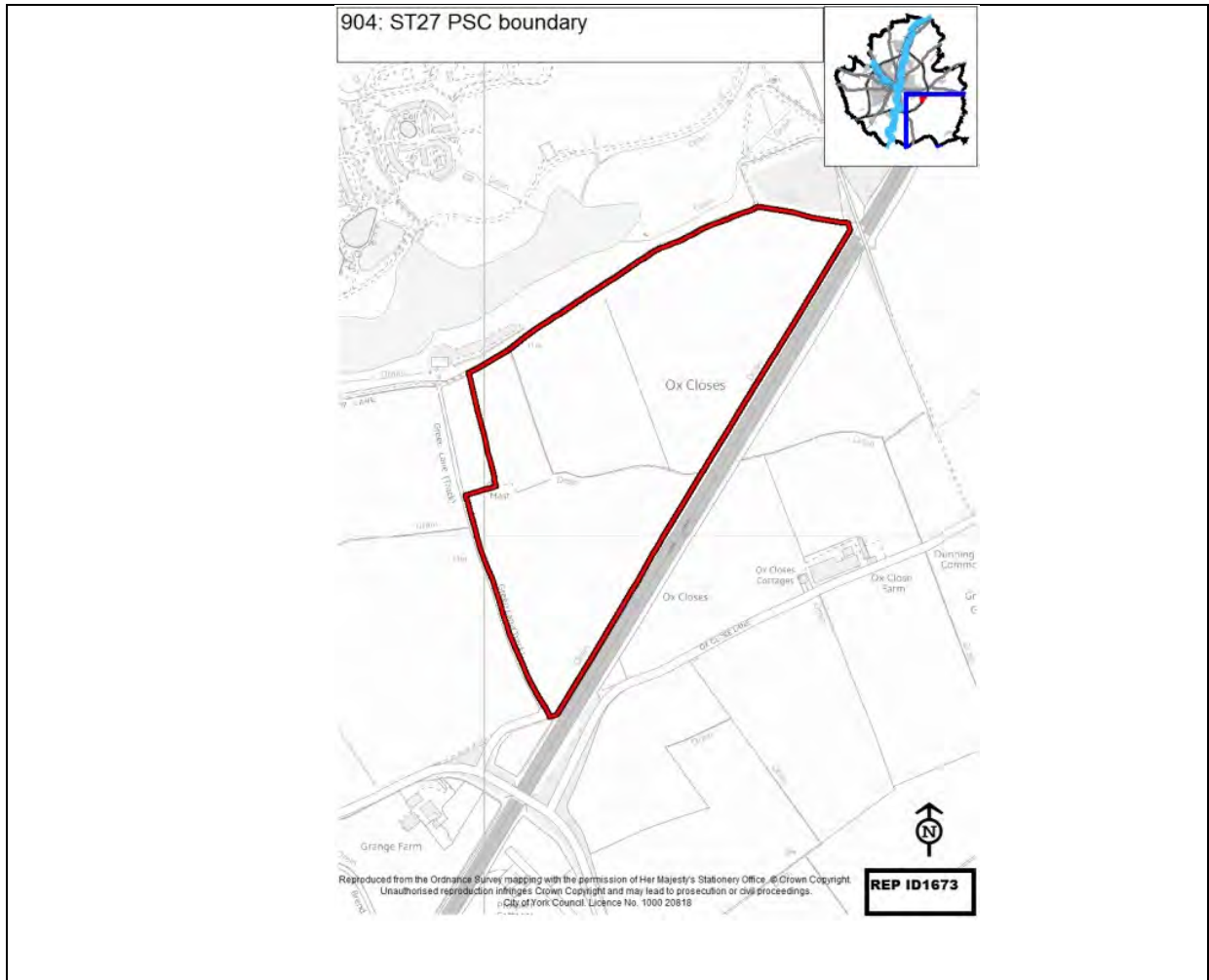
ST27: Alternative boundary proposed

Option 1 - 2014 version of 28ha with an external buffer of around 30ha. This would provide 26ha of developable land and negates need for landscape buffer in allocation. Preferred option thought to be most successful to meet the University's needs in the long-term. 2ha remains outside of university control. Likely to have a strong landscape scheme with high quality open parkland setting with wide southern buffer area. Principally the campus will be seen from the south east although the 64 corridor acts as a visual barrier. Accepted that there will be significant change in landscape character at Heslington East from open agricultural land to areas of large scale built development. No impacts on views to Heslington although some panoramic views. Also likely to have strong green belt boundaries along historic field pattern. Detailed landscape principles are recommended. Parkland setting key to mitigating landscape changes similarly to Campus East. Site would cater for 3 x residential colleges and research-led business activity linked to the university.



Option 2 – version in the current plan that above response if referring to.





SS23: Land at Northminster Business Park (ST19)			
Total respondents: 19		Support: 2	Objections: 16
Key Issues Raised		Comments: 5	
Support	<p>Northminster Business Park supports allocation of land to support expansion of the business park for economic activity. Concerned that the council does not intend to safeguard land so commercial development will be constrained in the future due to the lack of available land for businesses outside the green belt.</p> <p>Carter Jonas (on behalf of client) support the designation of this land as a strategic employment land.</p>		
Objection	<p>Poppleton Parish Council, Upper Poppleton Parish Council and Poppleton Neighbourhood Plan Committee object to expansion of the business park into green belt land. The narrow country lane cannot take more traffic and the conversion of many offices around York indicates that there is no need for additional office space. There is spare land within York Business Park that should be developed before green belt land.</p> <p>Rufforth with Knapton Parish Council recognises that an extension to</p>		

	<p>Northminster Business Park would provide significant job opportunities but the proposed scale is too large. A smaller expansion like that in PSC 2016 might be acceptable.</p> <p>Nine members of the public voice strong objections for some or all of the following reasons: 1. The site is directly at odds with the Upper and Nether Poppleton Neighbourhood Plan. The site is not suitable for expansion beyond its existing boundary. 2. Loss of residential amenity for the residents on Northfields Road. 3. It conflicts with Green Belt policy and harms the Green Belt. 4. It conflicts with Policy GI3: Green Infrastructure Network. Expansion of ST19 would close the crucial green corridor further and allow coalescence. It will affect the local wildlife. 5. Northfields Lane is unsuitable to support traffic for such a major expansion. 6. Additional traffic will be dangerous for both residents and road users. 7. There is no requirement for the expansion as some of the existing business properties appear empty. 8. Loss of grade 1 and 2 Agricultural Land.</p>
Comment	<p>Northminster Business Park feel the criteria are too general to provide real guidance at the planning application stage. Criteria only repeats the premise behind the actual allocation of the land which is already stated in the policy. Suggests rewriting for further clarity and to include substance to shape development. No need for criteria 4.5 as the business park is within walking distance of park and ride and new development would be too. 4.7 criteria (v) and (vi) could be simplified to clarify meaning. Also points out that the Business Park has additional capacity beyond the land currently allocated.</p> <p>Highways England would not expect this to have a substantial individual impact on the operation of the A64 but expect it to combine with the other larger sites around the A1237 to have a significant traffic impact on the A64/A1237 junction west of York</p> <p>Historic England have no objection to the principle of development provided that, in order to retain separation between the business park and nearby villages, the southern extent of this area should not extend any further south than the existing car park to the south of Redwood House. Without this reduction development would threaten the separation of Northminster Business Park from the village of Knapton which would be just 250m from the southern boundary of the area.</p> <p>Northern Power Grid note the potential need for network reinforcement for connections to this proposed development site to accommodate the additional load but the level of detail available in the plan is not sufficient to quantify the extent at this stage of development. HV infrastructure reinforcement may be required for this site. This may have impacts on development timescales so it is advisable that as soon as developers have details of their developments location and electrical capacity requirements they submit an application for connection to Northern Power Grid so they can provide a quotation for the connection and details of any reinforcement and/or diversion works that may be</p>

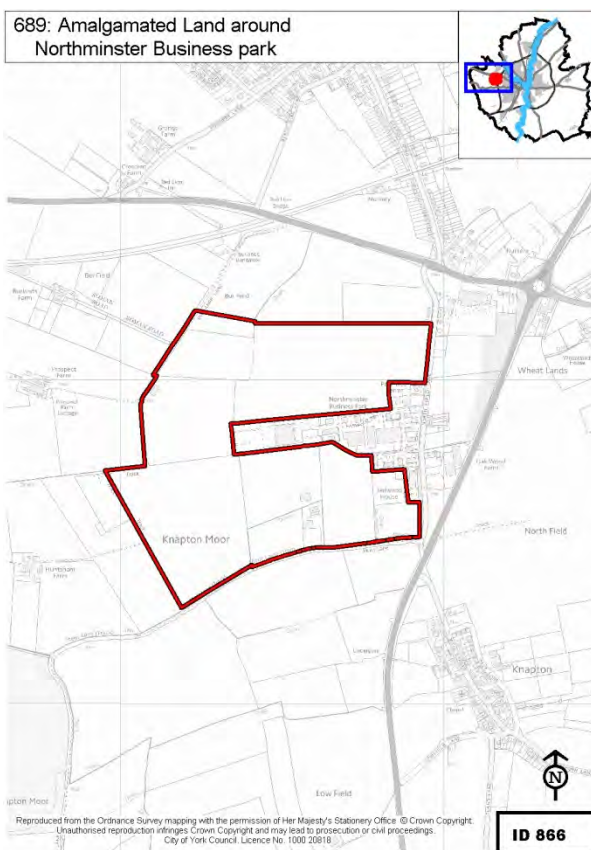
required.

A member of the public has concerns that extending the Business Park would lose prime farmland and green belt. Doubling the size of the site will also cause traffic and safety issues on a North End lane, a single road.

ST19: Alternative boundary proposed

Directions Planning OBO Northminster Ltd

Believe Northminster Business Park has additional capacity beyond the land currently allocated under Policy SS23, and as shown on the Proposals Map. Previous submissions have included an indication of the land available for development that would be suitable to inform the next phase of expansion of the business park - happy to discuss the opportunity with the Council further.



SS24: Whitehall Grange (ST37)

Total respondents: 5 | Support: 1 | Objections: 2 | Comments: 2

Key Issues Raised

Support	Autohorn support the allocation for B8 storage use at Whitehall Grange, this is a logical progression following the granting of planning permission for B* storage in April 2017. (Please note that site has been wrongly labelled ST27 on some pdf/paper versions of the proposals map.)
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<p>Objection</p>	<p>Historic England object, recommending deletion of the site on the basis that the site forms part of the green wedge that extends into the north of the City, which is centred on Bootham Stray. Although there are a handful of buildings on this site, it is clearly perceived as a part of this open area. The loss of this site and its subsequent redevelopment would result in the considerable narrowing of this wedge and harm one of the key elements identified in the Heritage Topic Paper as contributing to the special character and setting of York.</p> <p>One member of the public objects on the grounds that any development here that was too big would cause the sight line of the Minster from the edge of the ring road to be lost.</p>
<p>Comment</p>	<p>Highways England has no particular concern with this site except for its potential to combine with the other larger strategic sites around the A1237 to have an impact on the two junctions of the A1237 with the A64.</p> <p>One member of the public also commented to say they were also concerned about potential traffic on the northern ring road (A1237).</p>
<p>ST37: Alternative boundary proposed</p>	
<p>No alternative boundary proposed</p>	

Section 4: Economy and Retail

EC1: Provision of Employment Land

See Section 3: Spatial Strategy re:

ST5: York Central

ST19: Northminster Business Park

ST27: University of York

ST26: South of Elvington Airfield Business Park

ST37: Whitehall Grange

EC1 Wheldrake Industrial Estate (E8)	
Total respondents: 4	Support: n/a
Objections: 4	Comments: n/a
Key Issues Raised	
Support	None
Objection	<p>Wheldrake Parish Council objects to the proposed expansion of the industrial estate at its north side because of its adverse impact on the primary gateway to the village where the visual approach could be dominated by industrial type buildings rather than a pleasant green space as at present. Also, the Conservation Area western edge is close to the proposed area of E8.</p> <p>Wheldrake Ward Councillor (Cllr Mercer) also objects because of the negative impact on the visual approach to the village. Any expansion of the industrial estate should be at the south side, as in the previous Local Plan.</p> <p>Two members of the public object due to the loss of green space detracting from the visual approach to the village.</p>
Comment	None
E8: Alternative boundary proposed	
No Alternative Boundary Suggested	

EC1 Elvington Airfield Industrial Estate (E9)	
Total respondents: 17	Support: 7
Objections: 9	Comments: 1
Key Issues Raised	
Support	<p>Elvington Parish Council supports the site allocation but wishes to point out that it is not a 'brownfield' site as described but is a grassy paddock.</p> <p>Wheldrake Ward Councillor (Cllr Mercer) is largely supportive of the allocation and reaffirms the Elvington Parish Council comment.</p> <p>Five members of the public support the allocation provided there is some traffic management in place to limit HGV access through the village. Two of the five state their support is dependent on a 7.5 tonne weight limit being imposed on HGVs using Main Street in the village. They also stress that attention must be paid to the continuation of the</p>

	existing wildlife corridors set up under the Biodiversity plan.
Objection	Nine members of the public voice strong objections for some or all of the following reasons: 1. Elvington is already surrounded by industrial estates. 2. Noise and air pollution are existing problems, that will only be exacerbated. 3. Additional traffic both during construction and occupation will exacerbate congestion. 4. Existing road safety issues will be exacerbated. 5. Impact on wildlife. 6. Changes to character of the village.
Comment	One member of the public comments B2 usage should be restricted to light industry. Limitations should be placed on HGV movement through the village.
E9: Alternative boundary proposed	
No Alternative Boundary Suggested	

EC1 Chessingham Park, Dunnington (E10)			
Total respondents:	2	Support:	1
		Objections:	n/a
		Comments:	1
Key Issues Raised			
Support	Dunnington Parish Council supports the allocation as it develops a currently derelict site within the industrial estate.		
Objection	None		
Comment	One member of the public comments to say Industrial areas need light, small, affordable units (50-100 sqm) to accommodate business start-ups.		
E10: Alternative boundary proposed			
No Alternative Boundary Suggested			

EC1 Annamine Nurseries, Jockey Lane (E11)			
Total respondents:	n/a	Support:	n/a
		Objections:	n/a
		Comments:	n/a
Key Issues Raised			
Support	None		
Objection	None		
Comment	None		
E11: Alternative boundary proposed			
No Alternative Boundary Suggested			

EC1 Poppleton Garden Centre (E16)			
Total respondents:	7	Support:	5
		Objections:	1
		Comments:	2
Key Issues Raised			
Support	Nether Poppleton Parish Council, Upper Poppleton Parish Council and Poppleton Neighbourhood Plan Committee comment that the general		

	<p>consensus from the neighbourhood plan is that the garden centre should remain as a valuable attribute to the area. Change of use to housing would be opposed.</p> <p>Wyevale Garden Centres support the removal of the site from the green belt and its allocation for employment. Suggests that the site is suitable for B1a employment use as well as the current designation for B1c, B2 and B8.</p>
Objection	<p>Historic England objects to the extension of development beyond the footprint of existing buildings on site. Such development would reduce the gap between the ring road the effective southern boundary of Poppleton. It would harm a number of elements identified as contributing to the special character and setting of the City. Along with ST2, this would result in a considerable alteration to the setting of Poppleton as a free standing settlement, and its relationship with the City. It would threaten coalescence with Northminster Business Park to the south.</p> <p>One member of the public registered an objection to development but gave no specific reasons.</p>
Comment	<p>Historic England has no objection to the redevelopment of the part of the site currently occupied by buildings. Notes the extent of site should be reduced to exclude currently undeveloped area to the south of the existing buildings.</p> <p>One member of the public commented that any future part or total redevelopment of E16 should consider its location on an important approach to York. This should not be overdeveloped and should remain a rural business.</p>
E16: Alternative boundary proposed	
No Alternative Boundary Suggested	

EC1 Towthorpe Lines, Strensall (E18)			
Total respondents: 10	Support: 5	Objections: 3	Comments: 6
Key Issues Raised			
Support	<p>Strensall with Towthorpe Parish Council regret the Government's decision to close Towthorpe Lines (and Queen Elizabeth 2 Barracks), but are of the opinion that the inclusion of the sites in the Plan are logical and the allocation for business and employment is broadly supported to provide more local employment and to reduce the need to commute.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group support the inclusion of the site as a location for commercial use as the existing buildings could be adapted for a number of business uses.</p> <p>Julian Sturdy MP supports and is pleased the proposals indicate light</p>		

	<p>industry.</p> <p>DIO Estates (MOD) support the allocation for employment use.</p>
Objection	<p>DIO Estates (MOD) object to the restricting use classes to just B1c, B2 and B8 uses, would want allocation to include B1a and B1b as well. Also consider that there is potential to expand the size of the development footprint subject to ecological assessment.</p> <p>One member of the public objected to development as the facility for training medical staff deployed to disaster areas should be considered as an invaluable asset.</p> <p>Two members of the public object to development due to concerns around congestion, road safety, parking, schools, doctors and leisure facilities. Conservation of Strensall Common should also be a priority.</p>
Comment	<p>Referencing ST35 Strensall with Towthorpe Parish Council asks that, where relevant, equivalent policy considerations are applied to E18 as well.</p> <p>Julian Sturdy MP comments that consideration should be made for the additional HGVs coming to and from the site and how this may affect Strensall village. At his recent drop-in session it was proposed that an entry access road to this site could also provide, avoiding the SSSI land, an access route to the proposed Barracks site.</p> <p>One member of the public comments raising concerns about future congestion along Strensall road. Supports Strensall Parish Councils traffic management scheme, such as an upgrade of the junction between Towthorpe Moor Lane and the A64, road realignment, a new link road between Strensall Barracks housing site to Towthorpe lines commercial site, widening and improvement to Towthorpe Moor Lane, and a full off road cycle track down Strensall Road.</p> <p>Another member of the public comments that the MOD sites will not be available in time for this plan period.</p>
E18: Alternative boundary proposed	
No Alternative Boundary Suggested	

EC2: Loss of Employment Land

Total respondents: 6	Support: 1	Objections: 2	Comments: 4
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Key Issues Raised

Support	York TUC support policy but also suggest that measure be introduced to protect residual offices in the city centre / gain exemption from the relaxed rules at least until high quality offices are provided on York
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	Central.
Objection	<p>Picton Capital / Carter Jonas both state the word 'and' between the two numbered requirements should be replaced by 'or'.</p> <p>Picton Capital objects to the plan seeking to safeguard existing employment provision at Clifton Moor. It is considered that this approach is not justified given the CYC evidence base considers office space in Clifton Moor not to meet the quality required by the market.</p>
Comment	<p>DIO Estates (MOD) state the Policy may be too restrictive as a particular site may not be suitable for employment uses due to local circumstances, particularly around failure to attract suitable employment interest in a site. This should take into account 'compelling evidence of the local market context'.</p> <p>Carter Jonas comments on how at present the policy covers both existing employment land and buildings and land identified as employment land. Criterion (i) should apply only to the former and criterion (ii) only to the latter. The evidence requirement should be proportionate to the amount of employment land in question - this should be clear in the supporting text</p> <p>Member of the public asks if an article 4 direction will be implemented across the city centre to prevent conversions from office space to residential use.</p>

EC3: Business and Industrial Uses within Residential Areas			
Total respondents: 1	Support: 0	Objections: 0	Comments: 1
Key Issues Raised			
Support	None		
Objection	None		
Comment	Businesses within 'residential areas' can sometimes add life and animation to otherwise quiet areas of town. 'Sanitising' urban areas can be harmful.		

EC4: Tourism			
Total respondents: 5	Support: 3	Objections: 2	Comments: 4
Key Issues Raised			
Support	Both National Railway Museum and York Central Partnership support the intent of the policy to encourage the provision, retention and growth of existing visitor attractions.		
Objection	<p>York Green Party asks why the focus on 4 and 5 star hotels? Would prefer 'Encourage development of a wide range of accommodation to suit all pockets and thereby encourage overnight stays.' Surely B&Bs are struggling in York and yet retain far more money in the local economy than corporately owned hotels.</p> <p>York Racecourse object to the policy in its current form, feeling it should be more explicit/flexible in its support for the development of hotels at</p>		

	<p>existing tourism venues, such as the racecourse, who have future aspirations to locate overnight accommodation on site. Amendment to first bullet point suggests policy should place more emphasis on the importance of the Racecourse in the Local Plan, and to supporting its local economic contribution. "...business/ leisure visitors, particularly in the city centre and areas that provide locally significant visitor attractions, such as York Racecourse". Reference to York Racecourse as a conferencing venue in supporting text does not pay enough attention to its contribution to tourism industry and local economy. Amended wording proposed is: "<i>Uses of international and/or national importance and the buildings and sites that accommodate them will be protected and supported throughout the City of York. Sustainable growth for the benefit of the local area will be encouraged by the enhancement of existing visitor attractions, particularly York Racecourse (and other significant sites as appropriate)</i>". This policy is also in conflict with policy SS2, York's Green Belt, which in its current form would restrict development and change at the racecourse.</p>
Comment	<p>Policy does not mention nature tourism, this could be promoted and relevant websites given.</p> <p>National Railway Museum is generally supportive of the policy but consider that it could be enhanced to encourage growth of tourist related functions. Explicit support for the extension and improvement of existing tourist attractions should be included. Bullet point 3 should be amended to state that temporary physical structures related to the visitor attractions will be supported in principle.</p> <p>York Racecourse makes a significant contribution to the vibrancy of the local area, generating economic, cultural and social benefits to York and broader area. The language of policy EC4 and how it seeks to promote the tourism sector runs counter to the designation of the racecourse in the green belt and therefore restricting its limits on development. Suggests wording to highlight the importance of the racecourse, and the aspirations for the development of a hotel.</p>

EC5: Rural Economy			
Total respondents:	8	Support:	2
		Objections:	0
		Comments:	7
Key Issues Raised			
Support	York Green Party supports diversification of the rural economy. Campaign to Protect Rural England welcome the statement that CYC intend to control the development of caravan/chalet style holiday accommodation through occupancy conditions to ensure the tourist industry is supported and that units do not become sole places of residence via policy EC5.		
Objection	None		
Comment	Nether Poppleton Parish Council, Upper Poppleton Parish Council and Poppleton Neighbourhood Plan Committee all stress that the removal of green belt status through farm diversification activities needs to be addressed. Policy needs greater clarification. Inconsistencies between		

	<p>this policy and EC1 and GB1. This concern is also shared by Jennifer Hubbard Town Planning Consultant, asks if is it intended that development which is supported by EC5 will not have to pass the test of maintaining the openness of the Green Belt?</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group comment that the policy must be enforced to ensure residential use of such properties is not allowed and properties are identified for seasonal occupancy only.</p> <p>National Farmers Union comments to emphasise the contribution rural businesses make to the city's tourism offering. Diversification into tourism related activities is beneficial to agricultural businesses giving farm income base to be spread resulting in a more viable farm business - such diversification such be supported by the planning system - reuse of existing farm buildings for business and leisure purposes bring jobs to the rural economy.</p>
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R1: Retail Hierarchy and Sequential Approach	
Total respondents: 9	Support: 4
Objections: 0	Comments: 8
Key Issues Raised	
Support	<p>North Yorkshire County Council supports the general approach to focus retail development in the City Centre and reduce future development at out of town locations.</p> <p>There is support for this policy from Historic England, Fulford Parish Council and York Green Party.</p> <p>Historic England support the intention to maintain the city centre as the main focus for retail and commercial activity. The continued vitality and viability of the heart of the city is essential if its historic environment is to be maintained.</p> <p>Fulford Parish Council support that main town centre uses will be directed to the city, district and local centres and not out-of-town locations such as the Designer Outlet.</p>
Objection	None
Comment	<p>Nether Poppleton, Upper Poppleton Parish Council and Poppleton Neighbourhood Plan Committee indicate that there is no provision made at sites ST1 or ST2 for retail space. Should consider a shopping parade in ST1.</p> <p>Rachael Maskell MP highlighted that new developments must not draw further trade away from the city centre and small communities, but rather encourage more people into the city centre and suburbs like Front Street in Acomb.</p> <p>Policies R1 currently require all A1-retail development outside the Primary Shopping Area (PSA), specifically including York Central (ST5),</p>

	<p>to be subject to a sequential and impact assessment. Whilst this is strictly in accordance with the wording of the National Planning Policy Framework (NPPF), such an approach could harm the ability of York Central Partnership to allow for a comprehensive and sustainable development [at ST5] that meets the needs of its future community, including its residents and workforce.</p> <p>North Yorkshire County Council, whilst supporting the general thrust of policy, notes that the general approach to retail could be more robust to resist significant further out of town retail development. In addition the plan might go some way to acknowledge the changing face of town centre retailing.</p>
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R2: District and Local Centres and Neighbourhood Parades			
Total respondents:	2	Support:	1
		Objections:	0
		Comments:	1
Key Issues Raised			
Support	There is support for this policy from York Green Party.		
Objection	None		
Comment	It is suggested that the Council needs to work with local organisations to find ways to bring life and economic vitality to local centres like Acomb.		

R3: York City Centre Retail			
Total respondents:	11	Support:	4
		Objections:	3
		Comments:	9
Key Issues Raised			
Support	<p>Historic England support the requirement that permission for the reuse, reconfiguration and redevelopment of existing buildings would be subject to there being no historic building or conservation constraints. The rich townscape and the still largely intact urban grain with its narrow plots that characterise the city centre have been identified as contributing to the special character of the city. Economic growth has to be consistent with the conservation of this distinctive character of the City. Support for the intention to improve the appearance of the city centre through improvements to the public realm. There are several areas within York which fall well short of what would be expected within a historic city of this importance.</p> <p>York Green Party support, particularly the clauses aimed at controlling the balance of retail and non-retail establishments in the city centre and addressing the potential negative effects of cumulative impact of non-retail premises. The party suggest the following should be added to the first list of bullet points: 'Explore the extension and consolidation of the footstreets, leading to a largely car free city centre and a world class pedestrian environment, to support city centre businesses by providing an attractive and welcoming environment for residents and visitors.'</p> <p>Arup on behalf of the York Central Partnership and GVA on behalf of the Homes and Communities Agency (HCA) give general support for the policy and welcomes its inclusion within the Local Plan.</p>		

<p>Objection</p>	<p>GVA on behalf of the Homes and Communities Agency (HCA) states that the policy requires A1-retail development outside the Primary Shopping Area (PSA), specifically including York Central (ST5), to be subject to a sequential and impact assessment. Whilst this is strictly in accordance with the wording of the National Planning Policy Framework (NPPF), such an approach could harm the ability of York Central Partnership to allow for a comprehensive and sustainable development [at ST5] that meets the needs of its future community including its residents and workforce.</p> <p>GVA on behalf of the Homes and Communities Agency (HCA) suggest the policy should be amended so that the importance of an appropriate amount of retail development necessary to support the local community, both within and around the site, is recognised and weighs in favour of a future planning application.</p> <p>Concern over the proliferation of tearooms, restaurants and cafes in the centre of York hasn't been fully addressed.</p>
<p>Comment</p>	<p>The National Railway Museum suggest that the policy could be amended to recognise the importance of an appropriate amount of retail development necessary to support the local community both within and around the ST5 site.</p> <p>Nether Poppleton Parish Council, Upper Poppleton Parish Council and Poppleton Neighbourhood Plan Committee note that the loss of shopping from the city centre and increasing number of vacated shops is a disgrace and will deter visitor footfall. Possible temporary art exhibitions or displays from schools/colleges would be better than empty premises. They comment on the work done by the Civic Trust to bring the historic value of sections of the city to everyone's attention.</p> <p>Arup on behalf of the York Central Partnership give general support for policy R3 but suggest some modifications to the policy would improve it. Supportive of policy proposals which enable retail to be delivered on the York Central site. Suggest the need for clarity on the final sentence of the policy which requires proposals for retail uses on ST5 to be subject to the sequential test and impact tests. It is indicated that this needs to be explored further and as it is currently drafted would be overly prescriptive approach. Suggest it is not appropriate to refer explicitly to the need for these tests as this is covered in Policy R1. Retail and leisure uses are specifically defined as part of the York Central allocation in Policy SS4. Further sequential and impact testing for a site allocated for such purposes would be contrary to national policy guidance.</p> <p>The definition of 'Primary Shopping Area' should be loosened to also reflect principal gateway streets into the "primary shopping frontage". This would include Gillygate and Bootham in the definition arguably they should already be included as contiguous with High Petergate - suggest all the footstreets are "primary shopping frontage".</p>

	<p>Suggestion that a cycle park combined with free loans of wheeled shopping bags and pushchairs would support this policy and benefit city centre businesses. It would also benefit tourism, making it easier / cheaper to visit attractions and people would stay in the city centre for longer.</p> <p>Mixed use development in Castle Gateway needs to be treated with care, given the feedback from the community engagement process.</p>
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R4: Out of Centre Retailing	
Total respondents: 5	Support: 4
Objections: 1	Comments: 3
Key Issues Raised	
Support	<p>Highways England supports this policy as this approach causes lesser traffic growth on the A64.</p> <p>York Green Party support the policy and think the following new bullet point should be added: 'Will not add significant additional congestion to existing stress points on the highway network.'</p> <p>NTR Planning obo McArthur Glen, Aviva Investors & York Designer Outlet support the removal of the Designer Outlet from the Green Belt, support its expansion and consolidation and support the Designer Outlet being classed as part of the main built up area on the key diagram. They also support the recognition at paragraph 4.39 that York Designer Outlet provides a wider role within the catchment area of York, and that it provides economic benefits to the wider City. Support recognition that the City Council will support development at the York Designer Outlet will consolidate its function as a specialist retail location.</p>
Objection	<p>NTR Planning obo McArthur Glen, Aviva Investors & York Designer Outlet suggest recognition should be given to the parking issues identified at the York Designer Outlet which are restricting its ability to reach its potential economic contribution to York and the City's growth aspirations. It has a significant impact on traffic and parking management and will be further exacerbated by extension plans and an increase to park & ride. It is suggested that a solution would be to remove the 20 acre site to the south of the Designer Outlet from the Green Belt and allocate it for enhance/relocated park & ride and York Designer Outlet parking facilities.</p>
Comment	<p>Fulford Parish Council supports the principles of Policy R4 on Out-of-Centre retailing. However it considers that the reference in paragraph 4.37 to bulky goods retailing being potentially appropriate in out-of-centre locations should be deleted, especially as paragraph 4.38 extends the definition of bulky goods to items widely sold in and around the City Centre, including household appliances, audiovisual equipment and bicycles. The NPPF makes no such exception for bulky goods retailing. Fulford Parish Council considers that the last sentence of paragraph 4.39 should be deleted. Although ambiguous in its meaning, it could be used to justify further significant development in out-of-centre</p>

locations contrary to the intentions of Policy R4 (and national policy). In the alternative, the York Designer Outlet should be excluded from its provisions as the Designer Outlet is not a specialist location for the “sale of bulky comparison goods or other restricted comparison goods.” Its main retail offer is in fashion goods and it directly competes with the City Centre in this regard. Any significant increase in its retail offer (or as a leisure destination) would inevitably be to the detriment of the City Centre.

NTR Planning obo McArthur Glen, Aviva Investors & York Designer Outlet state their continued support for the need for York to have an up to date Local Plan which delivers the best possible future for the City. The York Designer Outlet has an important role to play in delivering the Council's aspirations in the Plan, providing an important economic and tourist location, employing 1600 people and attracting over 4.5 million visitors per year. .

If out of centre retail developments are harming the city centre, why allow them?

Section 5: Housing

H1: Housing Allocations

See Section 3: Spatial Strategy re ST sites and wider issues of Housing Growth

H1: Housing Allocations (general policy comments)			
Total respondents:	Support: 5	Objections: 32	Comments: 9
32			
Key Issues Raised			
Support	<p>The Highways agency support policy statements in relation to an allocated site only coming forward in advance of the phasing where infrastructure requirements are addressed.</p> <p>North Yorkshire County Council supports the recognition and inclusion of windfall development within Policy H1 in addition to allocations as a means of achieving additional flexibility for housing delivery.</p> <p>York Green party strongly support phasing of development but note that the majority are phased from Year 1.</p> <p>CPRE welcome this policy and the criteria against which applications will be approved. They also welcome that York does not need to make additional land available to address shortfall elsewhere. However, the impact of housing developments elsewhere will impact detrimentally upon the setting and infrastructure provisions of the City.</p> <p>Developers generally concur that strategic sites can provide a significant source of housing as part of a wider mix of sites including smaller sites. They generally also support increased density on these sites.</p> <p>Support for the policy was received in general.</p>		
Objection	<p>General objection to the policy was received in relation to the exclusion of previously allocated and discounted sites.</p> <p>The NHS have concerns over the location of population growth and that primary care facilities at garden villages will need to be considered early.</p> <p><u>Supply / Trajectory/ Phasing</u></p> <p>The majority of site developers disagree with the policy/portfolio of site allocations because:</p> <ul style="list-style-type: none"> • There is no real certainty over delivery rates on strategic sites as they are complex to deliver. • Additional allocations are required that can deliver homes in the first 5 years of the plan period, which will assist in addressing the shortfall 		

	<p>between the housing requirement and housing supply;</p> <ul style="list-style-type: none"> • Additional sites are required to ensure greenbelt permanence. • More detail is needed in relation to the housing trajectory. Details of lead-in times, annual delivery rates and density assumptions is required supporting the 5 year land supply position. • The way in which the Plan notes housing delivery beyond the Plan period of 2033 is considered confusing and not in conformity with the NPPF. • Several agents consider that the policy is so heavily caveated with instances where permission may be granted for sites ahead of the identified phasing - the policy is very unlikely to be effective. Windfalls should not be identified as a source of supply across the whole plan period; they should be treated as flexibility no supply. • It is not clear how many housing will be delivered in the plan period and post plan period. • The plan is reliant on higher densities provided by apartment living to make a significant contribution to overall supply even though the SHMA identifies that this is not the main type of dwelling required. • There is no supporting evidence to show how the capacities of the proposed allocations have been calculated and if specific site characteristics have been taken into account. Without these details it is impossible to ascertain whether site yields are realistic. <p><u>Commitments</u></p> <p>A 10% non-implementation rate should be applied to commitments.</p> <p>Student housing should not be included in the commitment figure.</p>
Comment	<p>Sport England comment that any allocation that contains playing fields or sport facilities needs to be consistent with policies HW3 and GI5 and para 74 of NPPF.</p> <p>CPRE consider that it is essential that any alteration to phased development will not prejudice delivery that may detrimentally impact on the 5-year housing supply.</p> <p>Lack of detailed housing trajectory makes comparison of the supply against the OAHN/ housing target difficult. However, Phasing' should be replaced with timescales.</p> <p>Allocating a wider range of general housing allocations at a wider range of locations would help to deliver 5 year supply (short-term).</p> <p>Build out rates on Strategic housing sites listed in Table 5.1 should be linked to any necessary capacity enhancements on the A64 and its junctions with the local primary road network.</p> <p>The policy should highlight more that previously developed land is the</p>

	<p>priority.</p> <p>The ability of some strategic sites such as ST35, to come forward in the short-term should be acknowledged</p>
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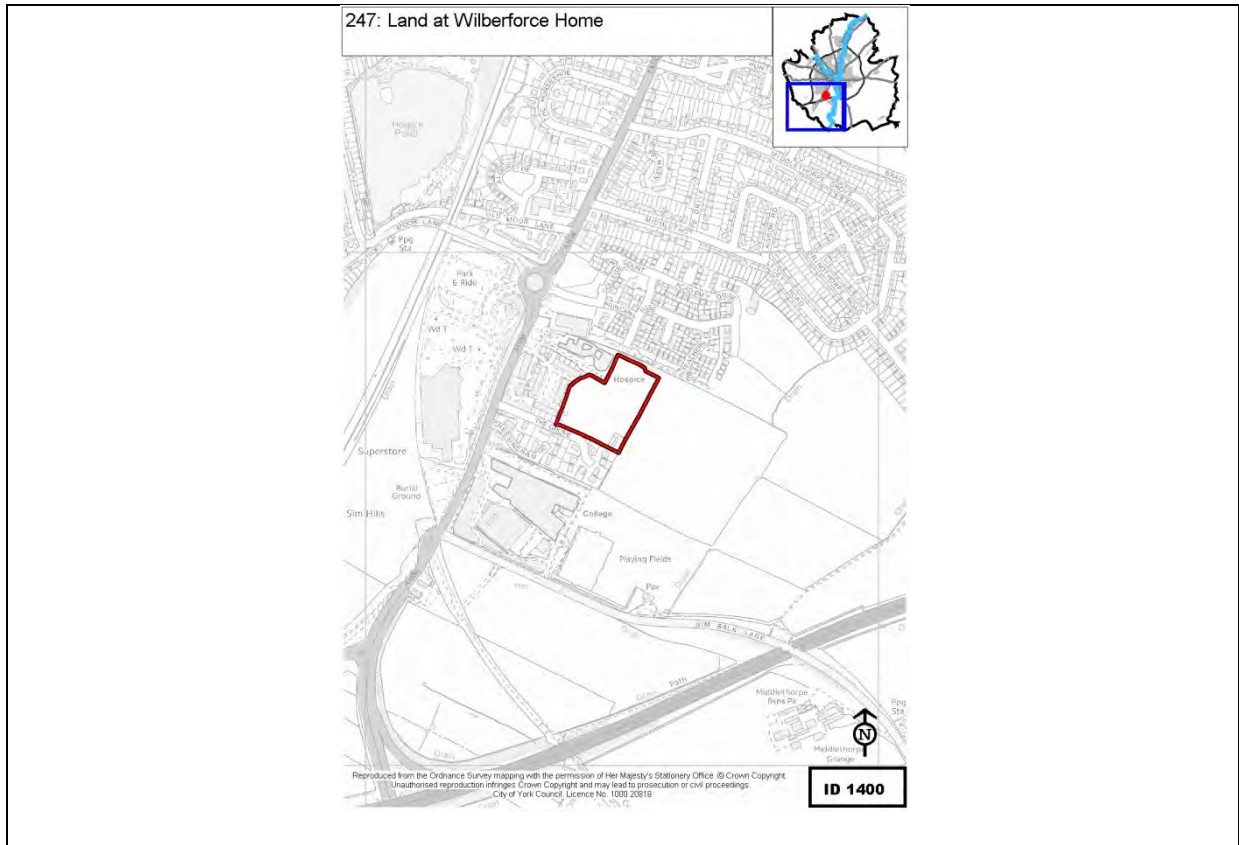
Site H1: Former Gas Works, Heworth Green			
Total respondents: 5	Support: 1	Objections: 2	Comments: 2
Key Issues Raised			
Support	The site is currently unattractive and needs developing.		
Objection	Objections to the site included the loss of green space, potential congestion and the high density assumptions used resulting in flats rather than family housing being provided. Concerns were raised surrounding access to the site which was seen as being inadequate.		
Comment	<p>Historic England had no objections to the principle of developing this site, however, given the proximity of the City Walls and CHC Conservation Area the significance of both should not be harmed as a result of developing this site.</p> <p>Removal of the gas holder and communications mast was generally supported, whilst it was suggested that a hotel should be considered for this site.</p>		

Site H3: Burnholme School			
Total respondents: 1	Support: 0	Objections: 0	Comments: 1
Key Issues Raised			
Support	None		
Objection	None		
Comment	Affordable housing should be provided.		

Site H5: Lowfield School			
Total respondents: 6	Support: 1	Objections: 4	Comments: 1
Key Issues Raised			
Support	Supports refer to the site providing much needed homes built in an area of need on a brownfield site.		
Objection	<p>Save Lowfields Playing Field Action Group object to this draft allocation stating that it represents gross over-development and will result in the loss of valuable sports pitches and recreational land. Development should be restricted to the built footprint only. Local support for older person's accommodation and useable public opens space on site has been overlooked as higher density development has been proposed.</p> <p>General objections include the impact the site will have on the amenity of local residents, the high density of development proposed as well as the loss of sports pitches in a ward with an open space deficit including sports pitch provision. There was an objection to CYC submitting a</p>		

	planning application on this site prior to the adoption of the Local Plan.
Comment	Comments in general looked positively at the potential for affordable housing to be provided on site whilst there was a willingness for the site to start early in the development process.

Site H6: Land r/o The Square, Tadcaster Road			
Total respondents: 5	Support: 2	Objections: 2	Comments: 2
Key Issues Raised			
Support	(O'Neill Associates obo St Leonards Hospice, St Leonards Hospice, The Wilberforce Trust) Support proposals to rear of Hospice and allocation of remainder of site as Green belt. Keeping land to the rear of hospice free from development is important for privacy of patients.		
Objection	(The Wilberforce Trust) Traffic impact on Tadcaster Road. At peak times at standstill and breaches EU air quality standards. Contains flora and fauna, site is attractive. Development should be discouraged and traffic flow improved. O'Neill Associates OBO Wilberforce Trust object to reference for C3b housing and would like re-designating as C3a		
Comment	Picture of site produced by O'Neill Associates Planning Consultants, with ultra modern buildings with garish colours is out of keeping with the architecture. Access is hazardous for students on foot on bike. Traffic should enter at Principals Rise where there is a wide island with room for parked cars. There are full border shrubberies on the site which are full of wildlife.		
Alternative boundary proposed			
O'Neill Associates OBO Wilberforce Trust Proposals for the site suggest changes which include extending the allocation to include a further 0.5 hectares of land to the north (which lies to the east of St Leonards H, with subsequent revisions to the Green Belt in order that it is more clearly defined) and removing the reference C3(b) as the use class for the development and redesignating it as use class C3(a).			



Site H7: Bootham Crescent			
Total respondents:	2	Support:	1
		Objections:	1
		Comments:	n/a
Key Issues Raised			
Support	Persimmon Homes (Yorkshire) Ltd – support development of this site and point out that a historic legal agreement with the owners allows for residential development once the football club moves to a suitable replacement ground.		
Objection	Rachel Maskell MP considers that more openspace should be provided on site given lack of green space in the area.		
Comment	None		

Site H8: Askham Bar Park and Ride			
Total respondents:	9	Support:	2
		Objections:	3
		Comments:	4
Key Issues Raised			
Support	Support the principle of housing here. However, some concerns over lack of a community focus in the area, esp following the development of the old college site.		
Objection	Congestion and parking issues – suggest retaining parking on P+R site as overflow for existing residents.		
	Park and ride should be preserved.		
	Building on H8 has the potential to affect the nature reserve at Askham Bogg.		

Comment	<p>Need incentives for builders to create affordable housing. Housing too dense.</p> <p>Congestion may become an issue – suggests traffic lights are removed/ slowed down.</p> <p>New rail link suggested.</p> <p>Proposed that York College could buy the site and use as overflow car park to stop student parking on residential streets.</p> <p>Prioritise housing for elderly (bungalows/ sheltered accommodation).</p>
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Site H10: The Barbican			
Total respondents:	2	Support: 0	Objections: 2
			Comments: 0
Key Issues Raised			
Support	None		
Objection	Objections relating to: concerns surrounding the increase in the amount of traffic onto Fulford Road and the need for plans to ease congestion; retaining the site as a green space for public use.		
Comment	None		

Site H20: Former Oakhaven EPH			
Total respondents:	2	Support: 0	Objections: 1
			Comments: 1
Key Issues Raised			
Support	None		
Objection	Site would be better staying as a care home for the elderly.		
Comment	Site should allow for additional parking provision.		

Site H22: Former Heworth Lighthouse			
Total respondents:	0	Support: 0	Objections: 0
			Comments: 0
Key Issues Raised			
Support	None		
Objection	None		
Comment	None		

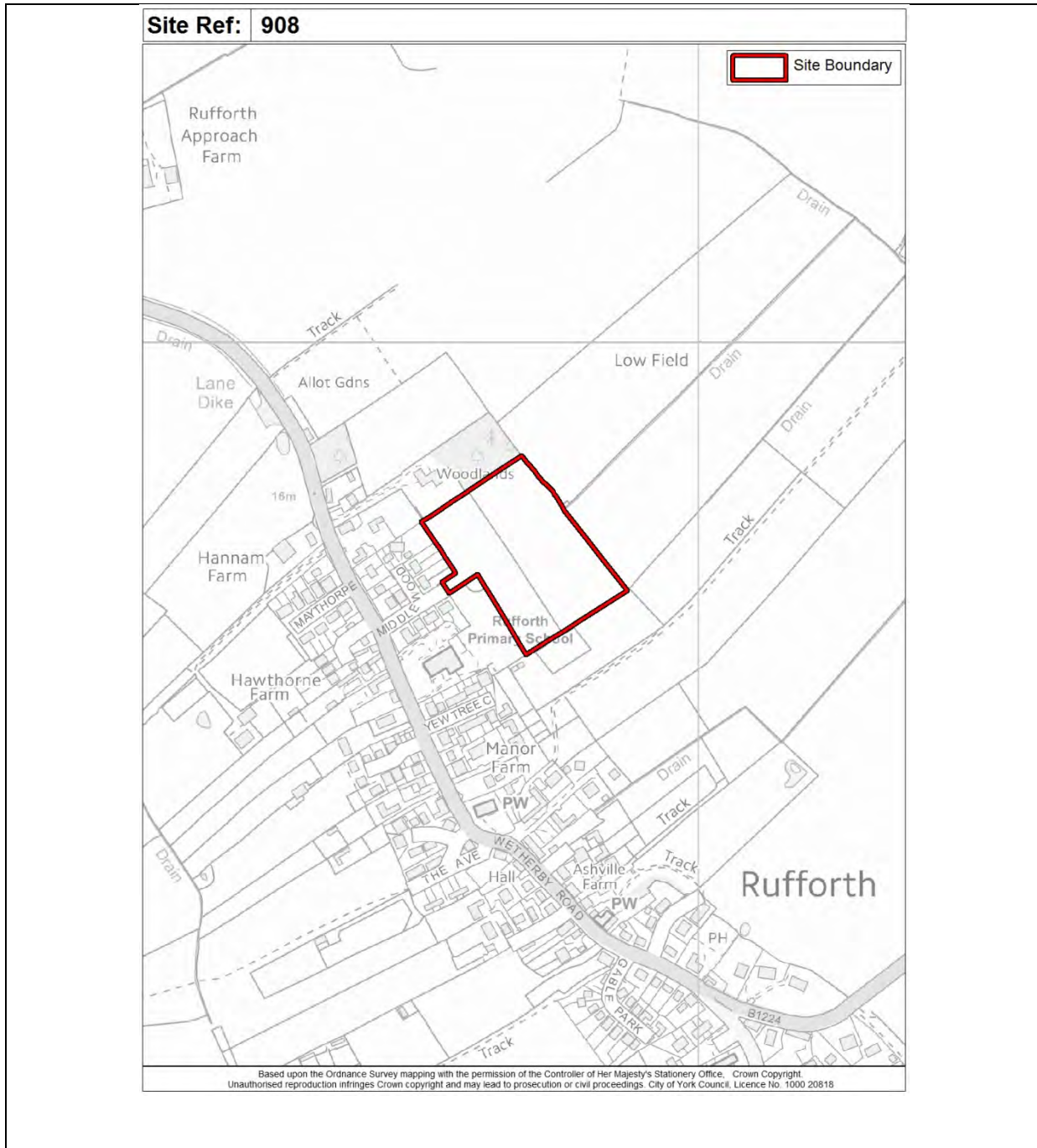
Site H23: Former Grove House EPH			
Total respondents:	1	Support: 0	Objections: 0
			Comments: 1
Key Issues Raised			
Support	None		
Objection	None		
Comment	Used to housing being densely concentrated in city centre. Appreciate provision of green space, protection of trees, and effort to build more housing.		

Site H29: Land at Moor Lane, Copmanthorpe			
Total respondents:	Support:	Objections:	Comments:
15	2	8	7
Key Issues Raised			
Support	<p>Developer confirms that the site is suitable, available and achievable and can provide 88 high quality homes alongside public open space and associated necessary infrastructure. Completion of the site is anticipated within the next 5 years @ 35 dwellings per annum. (PB Planning on behalf of Barratt Homes)</p> <p>Support for the site identified that it is a logical extension to the existing village and is, therefore, in-keeping and contained by the railway line and Moor Lane.</p>		
Objection	<p>Copmanthorpe Parish Council object to the site and state that if built at a density to match that of the existing village only 60 homes should be built as opposed to the 88 specified in the draft Local Plan.</p> <p>General objection comments to this site relate to the proposed number of houses being inappropriate for the edge of a village with only one access point. Concerns were also raised in connection to the capacity of local roads to take additional traffic that would result in dangerous junctions and congestion. Also local services, such as schools were at capacity. It was suggested that more appropriate sites in Copmanthorpe are available for development. Wildlife needs to be considered before any start to development can be made.</p>		
Comment	<p>Representations from the prospective developer explain that the associated open space, both on site and via financial contributions towards local community infrastructure will be delivered as the site progressed through the developments process. (PB Planning on behalf of Barratt Homes)</p> <p>Barton Wilmore (on Behalf of Barratt and David Wilson Homes) commented that a series of individual letters promoting each site including H29 are also submitted to be read in parallel other submitted representations.</p> <p>General comments note that improvements to local infrastructure (roads, drainage, schools and doctors) should be put into place before development takes place. There were general reservations about the proposed density of housing to be provide and it felt that it should reflect existing estates.</p>		

Site H31: Eastfield Lane, Dunnington			
Total respondents:	Support:	Objections:	Comments:
30	2	22	9
Key Issues Raised			
Support	(PBPlanning on behalf of David Wilson Homes) Site is available, deliverable and achievable. Thorough evidence taken to support site.		
Objection	(Dunnington Parish Council) Access issues – Eastfield Lane too narrow, however if widened will be used as a shortcut to A1079/ will destroy		

	<p>ancient hedgerows.</p> <p>Concerns raised in relation to junction of Eastfield Lane and Church Balk being unsuitable to cater to traffic increase and associated safety concerns.</p> <p>(Dunnington Parish Council) Housing density – overcrowded.</p> <p>Lack of green space – impact wildlife/ hedgerows/ protected species, site is agricultural grade 2</p> <p>Currently peaceful and tranquil area.</p> <p>Liable to flood – drainage needs upgrading.</p> <p>Will affect community.</p> <p>Need more public transport.</p> <p>Lack of existing infrastructure in village. Concerns relating to waiting times at doctors will increase, at capacity. In addition, lack of school space– public transport links far from current school which will encourage car use, no nursery in village.</p> <p>(O'Neill Associates on behalf of Jorvik Homes) H30 more suitable site.</p> <p>Negative effects on SA objectives.</p> <p>Impact character of village.</p> <p>(PBPlanning on behalf of David Wilson Homes) Support 84 dwellings as opposed to 76 allocated in the Local Plan.</p> <p>(Barton Wilmore on Behalf of Barratt and David Wilson Homes) A series of individual letters promoting each site including H31 are also submitted to be read in parallel to these overarching representations.</p>
Comment	<p>(Dunnington Parish Council) Surface water and drainage issues.</p> <p>(Dunnington Parish Council) Provision for older residents should have easy access to surgery and shops.</p> <p>Eastfield Lane should be widened. Speed controls included. However this would remove ancient hedgerow which would harm character of village.</p> <p>Dangerous junctions.</p> <p>Traffic management scheme needed.</p> <p>Affordable homes needed.</p>

Site H38: Land r/o Rufforth Primary School	
Total respondents: 6	Support: 4
Objections: 3	Comments: 0
Key Issues Raised	
Support	<p>Rufforth with Knapton Parish Council support the development of this site stating it is also allocated for housing within the Rufforth with Knapton Neighbourhood Plan.</p> <p>DPP Planning (on behalf of Linden Homes) support the location of the development, however, support a larger boundary (see below).</p> <p>Support in general was expressed to the potential for the site to provide family housing within the village and the good access the site would provide to the school allowing for safer parking/drop off points.</p>
Objection	<p>The general objections received for this site focussed on the local drainage and sewerage issues that will be exposed if further housing adds to their capacities. Local road access is restricted and parking/congestion issues will result from development of this site.</p>
Comment	None
Alternative boundary proposed	
<p>DPP Planning (on behalf of Linden Homes) supports a larger boundary for this site (0.99ha) – as proposed by officers in July 2017. The site is suitable, deliverable and viable and has a willing landowner. The site is included in the Rufforth Neighbourhood Plan. It is also deemed not to perform a green belt function. Further evidence has been provided to support this larger site.</p>	



Site H39: North of Church Lane, Elvington			
Total respondents:	67	Support:	3
		Objections:	63
		Comments:	3
Key Issues Raised			
Support	(Directions Planning Consultancy) Supports housing and short to medium term time frame for 32 dwellings (DPP Planning on behalf of Linden Homes) Supports but not in preference to H26.		
Objection	Elvington Parish Council supports previous Planning inspector who determined that the site serves green belt purposes, which impact wildlife, degrade the conservation area and encroach on countryside.		

Elvington Parish Council consider that this site conflicts with policies on wildlife protection. Together with members of the public, concerns are raised in relation to the impact on wildlife, a listed boundary hedge to site and link to Wheldrake Ings. Development would bring pets which would predate on wildlife. River Derwent is under restoration and this would impact that.

Elvington Parish Council and Julian Sturdy MP as well as several members of the public consider that traffic would impact on resident's quality of life. Traffic will increase on B1228, which is already busy. Many consider that the road is at capacity. In addition, concerns were raised in relation to increase of HGV use and safety of residents.

Unsafe for children in street due to access through Beckside residential area.

Members of the public also raised their concerns in relation to parking issues on Beckside due to lack of garages and small driveways as well as the narrow nature/ sharp bend of Church Lane.

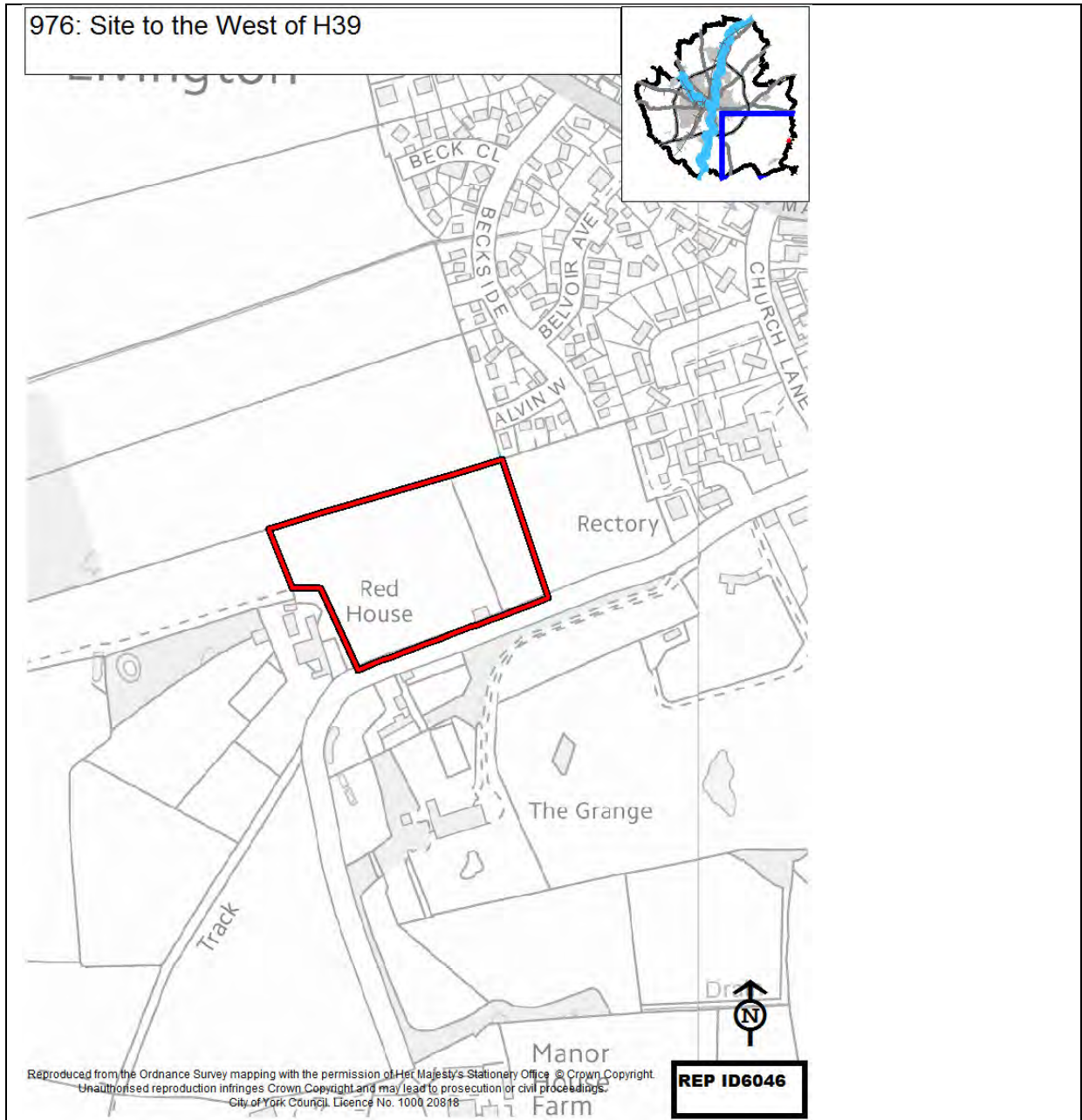
Wheldrake Ward Councillor, Elvington Parish Council, DPP Planning on behalf of Linden Homes and members of the public expressed preference for alternative site H26 as it is considered that this links two residential areas of Elvington. It is considered that 60 houses is more suitable and that removing H26 is against the wish of residents.

Preference for housing to be accommodated on ST15 also expressed by Members of the public.

General objections by the public included:

- Access to site via Church Lane is not viable or safe. Access via Beckside preferable.
- More housing will worsen drainage issues and decrease water pressure. Flooding issues are likely to get worse on Church Lane,
- Beckside disproportionately large and densely populated. The site is out of keeping with rest of village and there will be a clear mismatch between old and new development. As a result the character of village will be damaged. Houses in area bought due to rural aspect which will be ruined.
- No suggestions on addressing adverse effect on infrastructure. School and medical practise are struggling to cope with numbers now.
- Variety of housing needed – executive style, 4 bed homes and starter homes. Identified need for site does not meet these requirements.
- Draft plan is wrong where it indicates village has only industrial units – there are 150 residential properties to the west of the school.
- Edge of site contains a country walk used by many. Site used for recreational reasons – walking, dog walking.

	No defensible boundary to the west which conflicts with par 85 of the NPPF.
Comment	<p>Site is a historic conservation area.</p> <p>Past inspectors report stated site should remain open for green belt.</p> <p>Concerned about impact of traffic on child friendly streets.</p> <p>Site is not natural extension to village or within walking distance to amenities</p> <p>Social care in area is poor, and there is no reliable public transport for health services in York, current surgery at capacity.</p> <p>Need to consider road safety and increase of HGVs.</p> <p>Shortage of 4-5 bedroom houses and affordable housing.</p>
Alternative boundary proposed	
<p>Directions Planning OBO landowner</p> <p>Previously highlighted merits of site 789 (Land West of Beckside, Elvington) an area of 5.7ha as a housing allocation. The current representation is for a smaller site of 1.6ha (Site 976) - delivering approx 56 dwellings as an extension to H39. Propose that this site is removed from the Green Belt and allocated for housing. Previous representation attached to current submission.</p>	



Site H46: Land north of Willow Bank and east of Haxby Road, New Earswick

Total respondents: 13 | Support: 1 | Objections: 11 | Comments: 1

Key Issues Raised

Support Jennifer Hubbard Town Planning OBO JRHT supports this site and the landscaped strip along its eastern boundary confirming that previously made comments from JRHT remain valid.

Objection Objectors to this site raise concerns about the likely impact of development on traffic and congestion, both locally and onto the A1237 (York Outer Ring Road). With increased traffic the concerns relating to pollution and increased accident risk near to the school have been raised as major issues.

	<p>Reference has been made to the fact that development of this site would remove the last remaining green recreational space in the parish and that there are no alternatives locally for public use and for the preservation of wildlife as it forms an important natural habitat for flora and fauna.</p> <p>It has been stated that local residents were successful in objecting to development of the site in the past and that nothing has changed since that time.</p> <p>Impact would result on local services and amenities as well as the loss of opportunities for recreational activities including dog walking, running and play space for school children.</p> <p>Some objectors raise concerns about local flooding and drainage issues that affect this site and local area and that investment in improvements to infrastructure should take place before any development can be considered.</p>
Comment	Historic England comment that they have no objection in principle to the draft allocation, however, the plan should make it clear any development should not harm the elements that contribute to significance of the New Earswick Conservation Area.

Site H52: Willow House EPH, Long Close Lane			
Total respondents:	5	Support: 0	Objections: 3
			Comments: 2
Key Issues Raised			
Support	None		
Objection	<p>Grounds should be formally and permanently retained as public open space for the recreational use of their communities.</p> <p>Objects to development as a whole.</p> <p>Concerned by choice to use land for student accommodation rather than for old people or green space. Hopes the pine trees will be saved.</p>		
Comment			

Site H53: Land at Knaption Village			
Total respondents:	8	Support: 2	Objections: 6
			(plus 1 NDM)
			Comments: 1
			(plus 1 NDM)
Key Issues Raised			
Support	<p>Indigo Planning support the continued proposed allocation of this site for residential use and its estimated capacity of 4 new dwellings (arrived at following site assessments undertaken in support of a previously refused application). The decision to refuse was based on the site being within the green belt, however, they state that there were no technical reasons that rendered the site unsuitable for housing. The site is well</p>		

	<p>contained with well established boundaries on three sides and will provide a defensible green belt boundary to the east if developed. The site will provide limited infill to the existing settlement form. There are no nature designations affecting the site and is well served by local road infrastructure and key services and has the benefit of a willing landowner.</p> <p>Rufforth with Knapton Parish Council support the site and affirm that it is also allocated within the Rufforth with Knapton Neighbourhood Plan.</p>
Objection	<p>Julian Sturdy MP is not convinced the proposal has addressed the issues previously raised and does not believe it should be included within the Plan.</p> <p>Several objectors raised concerns about the development of green belt land that forms part of the rural setting of Knapton. The site will create unwanted infill if developed and remove the benefits the site currently affords in terms of wildlife habitat and local green space. Due to its limited capacity the site will not greatly affect the area's housing needs. Further, the site is deemed unsustainable due to the lack of public transport and local services. The site is also in an elevated position and would create an imposing and out of character development whilst adding traffic through the village.</p> <p>It was pointed out that the site has previously been refused for residential use and if now allowed may set a precedent for future development encroaching on the green belt, especially when considered with other proposed local developments at, for example, Northminster Business Park.</p>
Comment	<p>Commenting on this site it was pointed out that Knapton Village is vulnerable to being joined to York and relies on protection provided by the green belt. Although the site is green belt land it could also be seen as infill land. A maximum of four houses is imperative to help maintain the character of the village and access should be from Main Street as Back Lane is too narrow for proper access.</p> <p>Development of 4 houses may lead to further development swamping village and green belt.</p>

Site H55: Land at Layerthorpe

Total respondents: 0	Support: 0	Objections: 0	Comments: 0
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Key Issues Raised

Support	None
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Objection	None
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Comment	None
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Site H56: Land at Hull Road

Total respondents: 25	Support: 2	Objections: 19	Comments: 4
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Key Issues Raised

Support	<p>Heslington Parish Council continues to support this allocation. Should the allocation be approved there should be conditions to provide good family accommodation and affordable housing for people of all ages whilst there should be continued preservation of the mature trees around the site.</p> <p>Further support for the development of this site was registered provided that it is sensitively developed with a low density design including affordable housing and tree planting to provide shielding with access to the site restricted only from Hull Road.</p>
Objection	<p>A Hull Road Ward Councillor objected to the proposed development of this site as it is currently an open green space with a mature border of woodland that is of great value to the local community. Outline consent has recently been granted for residential development on the site, however, the Councillor believes this should not have been allowed. In terms of the Local Plan the site should be treated on its merits and not automatically be included because planning consent has been passed. Designation of the site should be as green/open space as Hull Road has a deficit of open space. The site has long-standing, historical public use and these facilities have not been adequately replaced. As the open space and amenities at the University of York are not open to the general public there remains a deficit of such land within the Hull Road Ward.</p> <p>There were a number of objections received in relation to the allocation of this site for housing, below is a summary of the main points raised;</p> <ul style="list-style-type: none"> • The site is currently an open green space with a mature woodland border that is a precious asset to the local community • Previously this site was designated as Open Space that recognised the local value the site provided in terms of playing pitches, open space, wildlife corridor and the green wedge it forms that protects the character of Heslington Village as well as its function as a recreational amenity – development would negate these benefits. • A recently published report indicates a surplus of green space in the Hull Road ward – this is factually incorrect as the open space provision at the University of York should not be counted in the calculations as it is not accessible to the general public. • The playing fields are of good quality and do not flood, unlike their proposed replacements. • A petition of 1300 signatures was presented to CYC in order to protect the green space - this has been ignored. Further, petitions of greater than 1000, in accordance with CYCs website, should be debated by Full Council – this has not been the case. • Concerns were raised over the granting of outline consent for 70

	<p>homes on this land in advance of the Local Plan being adopted.</p> <ul style="list-style-type: none"> • The site has been allocated previously for open space, employment land and now as a housing allocation without due consultation. • The substitute open space at Haxby Road Sports Field is not appropriate as it is not easily accessible. • There are concerns about the potential housing type being for student housing, not the family housing that is needed. • Traffic generated from the site will add to congestion and pollution levels experienced locally. • The mature trees are important and fundamental for maintaining local air quality • Development would impact on the character of the area. • This open space helps prevent coalescence of the York Urban Area and Heslington Village and helps maintain the village's rural character – evidenced in the Heslington Village Design Statement. • The value of open space has been recognised in documents supported or issued by the Council.
Comment	<p>Northern Power Grid passed comment about the potential need for network reinforcement to accommodate the additional load on the system but at this stage there was insufficient information to quantify the extent at this point – this may impact on delivery timescales for the development of the site.</p> <p>General comments received expressed concerns about the impact development would have on the green belt and the loss of green space and reflect similar concerns covered within the objections to the site. It was raised that the housing capacity of the site is insignificant compared to the cities overall requirements, therefore, development should take place in more appropriate locations.</p>

Site H58: Clifton Without Primary School			
Total respondents:	3	Support:	0
		Objections:	2
		Comments:	1
Key Issues Raised			
Support	None		
Objection	<p>Objects to potential overdevelopment of the site, impact on house prices, potential access to Fairway, lack of local primary school space.</p> <p>(Clifton Parish Council) Support the principle of redeveloping the site but object its sole use for housing. Site has been a community facility within Parish for years and would like to see this is not lost. Support use of site as a new base for Salvation Army.</p>		
Comment	(Historic England) Plan should make it clear that any development would need to ensure that those elements which contribute to the		

	significance of the Clifton (Malton Way and Shipton Road) Conservation Area are not harmed.
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Site H59: Queen Elizabeth Barracks, Strensall	
Total respondents: 17	Support: 6
Objections: 8	Comments: 6
Key Issues Raised	
Support	<p>Strensall with Towthorpe Parish Council support this site and its early development in the Plan period. The site is largely previously developed land and will help to provide much needed low cost and affordable housing in Strensall. The Council comments that, as site H59 lies within the broader area of Queen Elizabeth II Barracks but outside the secure area, it could be developed before final closure of the Barracks thus helping to provide much needed low cost/ social housing in Strensall at the earliest possible date.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group also support the development of this site and propose it is released quickly to help provide affordable housing.</p> <p>GVA on behalf of DIO Estates (MOD) support the site coming forward as residential development.</p> <p>Further general support was expressed to the development of this primarily brownfield site that will include for much needed low cost and affordable housing. Whilst support for the site was expressed these were tempered with the belief that upgrades would be required to local road junctions (from Strensall and Flaxton onto the A64) and that improvements to the local sewerage system should be carried out prior to construction works on site taking place. Improvements to local infrastructure and services should reflect the extra demand that will result from this, and further proposed developments within the area. It was noted that the potential for development on brownfield sites, such as this, would take pressure off the development of greenbelt land.</p>
Objection	<p>Pilcher Homes have objected to the inclusion of the Queen Elizabeth Barracks development site (H59 and ST35) indicating that it is a concern to all stakeholders of the York Local Plan that it is considered to be sound and that the correct objectively assessed housing need is met and appropriate infrastructure will be in place to support new development. There is uncertainty about the availability of the MOD land within the Plan period and concentration should be placed on small to medium sized sites to help deliver early in the Plan period rather than on more unpredictable large housing allocations.</p> <p>General objections to the site focussed on the lack of local services and</p>

	<p>infrastructure within the Strensall area to support any additional local housing development. The school is over subscribed, there is no post-office or bank, there is one Tesco Express, whilst traffic, drainage and the sewerage system and local flooding all need to be taken into account before any development can commence. Local roads are busy and dangerous with parked cars on both sides of Main Street and any additional development will exacerbate existing traffic problems. The influx of additional housing schemes could overwhelm rural communities and ruin the character of the area.</p> <p>Objectors expressed a real need for improved road infrastructure including improved junctions with the A1237/A64 and a dedicated off road pedestrian/cycle track.</p> <p>Flooding and drainage in the area is highlighted as being problematic, whilst local services (supermarket, dentist, doctors, primary school and bus services) all need to be improved if any development is to take place.</p>
Comment	<p>GVA on behalf of DIO Estates (MOD) commented that the Preliminary Ecological Assessment (March 2017) identified that the QEII Barracks site should be subject to a botanical survey and subsequently to assess whether the presence of any of these areas of habitat represent a constraint to future development.</p> <p>Councillor Paul Doughty stressed the need for a suitable entry access road to the Queen Elizabeth II Barracks development sites that avoids the SSSI.</p> <p>General comments follow similar lines to those expressed in both the support and objections section and stress the need for improvements to roads, cycle paths, schools, doctors and leisure facilities before any developments commence. The conservation of Strensall Common was seen to be a priority.</p> <p>Suggested improvements to local road infrastructure included support for the Strensall Parish Councils traffic management scheme, such as an upgrade to the junctions between Towthorpe Moor Lane and A64, road realignment, a new link road between the barracks housing site to Towthorpe Lines commercial site, widening and improvements to Towthorpe Moor Lane and a full off road cycle track along Strensall Road.</p>

H2: Density of Residential Development

Total respondents: 27

Support: 7

Objections: 14

Comments: 7

Key Issues Raised	
Support	<p>Historic England welcome the requirement that density of sites should be informed by the character of the local area and that in conservation areas density should be guided by the appraisals detailed for that area – this will help to ensure new housing schemes will sensitively reflect the distinctive character of each area.</p> <p>York Green Party supports the principle of site specific flexibility in this policy and the principle that good design and density are intrinsically linked. More could be made of good sustainable design that can facilitate high density development that can still deliver a good quality of life including green open spaces. The mix and densities in garden villages and Greenfield sites could be considered further to allow for higher densities so long as accompanied by ambitious sustainable transport provision.</p> <p>CPRE North Yorkshire support Policy H2, referring to paragraph 47 of the NPPF, and welcome the potential densities set out that will ensure the most efficient use of land.</p> <p>Strensall with Towthorpe Parish Council support the policy with a maximum of 35 dph within the Parish.</p> <p>GVA (on behalf of the Homes and Communities Agency (HCA) and DIO Estates (MOD)) and Johnson Mowat (on behalf of Taylor Wimpey) both supported the policy and welcomed the details provided on net density, however, further clarification of net and gross density calculations is required.</p>
Objection	<p>The Home Builders Federation considers that development densities of 100 dph within the city centre along with 50 dph in the urban area to be overly optimistic. This density would result in small garden sizes, no garages and little parking space and houses hard to market. Lower densities would make developments more marketable and the policy should be amended to allow for more flexibility.</p> <p>Rapleys LLP (on behalf of British Sugar Plc) believe the density guidelines should not be viewed as a ceiling, rather a base level that can be exceeded where appropriate and justified and have suggested the policy be reworded to reflect this.</p> <p>Lichfields (on behalf of Keyland Developments, Linden Homes and Bellway Homes) point out that this policy sets out expected density levels throughout the different areas of the city. However, there is no supporting evidence to show how the capacities of the proposed allocations have been calculated and if specific site characteristics have been taken into account. Without these details it is impossible to ascertain whether site yields are realistic. The proposed densities are over ambitious and will not be achieved on sites throughout the City. 50 dph on a site of 1+ha at a net developable area of 95% is not seen as realistic. More appropriate net density assumptions should be used for</p>

	<p>net/gross ratios. Family housing will not be achieved at the levels suggested.</p> <p>Jennifer Hubbard Town Planning Consultant states this policy/identified zones are too prescriptive. Whilst on larger strategic sites density targets may be set aside, on smaller sites it is likely that rigidly sticking to density targets will result in a development not responding to site and local constraints or meet a range of housing needs. The policy needs deleting.</p> <p>DPP Planning (on behalf of Shepherd Homes and Landowner) objects to the change of rural density calculation that has taken place between Preferred Options and Pre-Publication Draft. Villages and rural areas should be at 30 dph. Higher density levels are not evidenced or justified.</p> <p>GVA (on behalf the Homes and Communities Agency (HCA)) believe that for consistency with the remainder of the Plan the wording of the policy should be amended to '100 units/ha within the city centre and York Central (ST5)'.</p> <p>Carter Jonas (on behalf of Picton Capital Ltd) consider that there should be a degree of flexibility within the policy citing a proposed alternative site at Kettlestring Lane represents a density of 58 dph that should be acceptable within an accessible and well connected location.</p> <p>Barton Wilmore (on behalf of Barratt David Wilson Homes) suggest that a caveat be added to the policy to ensure there is flexibility regarding the proposed housing density targets.</p> <p>A general objection was made to the high density development that could damage the sense of space and limit the levels of amenities that could be provided within sites.</p>
<p>Comment</p>	<p>Gladman Developments suggest that an element of flexibility should be added to the policy. In the case of rural areas and villages 35 dph is out of keeping and a lower density figure may be more appropriate.</p> <p>Lichfields (on behalf of Hungate (York) Regeneration Ltd) comment that on large strategic sites the master planning may produce density targets that could override the approach in this policy. Densities should be appropriate to the character of the surrounding area and should be considered on a site by site basis. Higher densities would be appropriate in city centre brownfield sites that would make efficient use of land.</p> <p>Arup (on behalf of the York Central Partnership) are in favour of the general guideline on densities but points out that York Central represents a highly sustainable brownfield site and flexibility in the policy would provide the possibility for delivering densities that reflect the nature of the site.</p> <p>Johnson Mowat (on behalf of Redrow Homes, Linden Homes and</p>

	<p>Landowners) welcome the reference to net densities in this policy as this is often overlooked, though further clarification would be beneficial.</p> <p>Barton Wilmore (on behalf of Barratt and David Wilson Homes and Equibase Ltd) comment that CYC outline proposed densities that it states ne developments will be expected to achieve that vary in different areas within the district. This approach is encouraged to provide certainty for developers, however, the policy should remain flexible and be used as a guide to define densities as each site has unique characteristics that may reduce the developable area and affect potential density levels.</p>
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H3: Balancing the Housing Market	
Total respondents: 30	Support: 7
Key Issues Raised	Objections: 13
Support	Comments: 16
Support	<p>Lichfields (on behalf of Bellway Homes and Hungate (York) Regeneration Ltd) are supportive of this policy in principle and meeting the housing mix as set out in the SHMA.</p> <p>Arup (on behalf of the York Central Partnership) support the need to balance the housing market by including a mix of housing types and are supportive of the final mix of dwelling types and sizes being subject to negotiation.</p> <p>GVA (on behalf of the Homes and Communities Agency (HCA)) welcome the policy approach.</p> <p>CPRE North Yorkshire supports the policy aim to ensure there is a balanced housing mix across development and is in accordance with the SHMA.</p> <p>Johnson Mowat (on behalf of Taylor Wimpey) are supportive of this policy but consider that there needs to be an element of flexibility included within it suggesting that a size threshold is used against which evidence of demand and need is required.</p> <p>Barton Wilmore (on behalf of Barratt and David Wilson Homes) welcome the flexibility that is included within the Plan that states that the final mix of dwelling types and sizes would be subject to negotiation.</p>
Objection	<p>Home Builders Federation note that this policy is based on evidence set out in the SHMA, however, they state this will only identify current deficits and reflect a snapshot in time. The HBF would like to ensure greater flexibility within the policy to acknowledge that the mix will vary geographically and over the plan period. Flexibility should also reflect market demand and aspirations – not just housing need.</p> <p>Lichfields (on behalf of Bellway and Linden Homes) believe a geographical dimension should be incorporated into this policy to reflect the mix found at a local level such as larger family housing in and</p>

	<p>around existing settlements. Flats are better suited on sites within the main urban area where higher densities are more acceptable. There may also be gaps within the local housing offer that require addressing.</p> <p>Barton Wilmore (on behalf of Barratt and David Wilson Homes and Equibase Ltd) objects to family homes being defined as only 2/3 bed properties as outlined within the policy. There is no justification for excluding 4/5 bed properties from the definition of family homes and there is a need for this type along side smaller homes to ensure choice within the market. The Policy as worded is not justified or effective, therefore unsound.</p> <p>Johnson Mowat (on behalf of Taylor Wimpey) objects to this policy as it fails to present a case for both need and demand.</p> <p>A general objection to this policy was received citing that York provides very poor availability of family homes and that more provision should be made for this type of housing rather than 1 and 2 bed flats.</p>
Comment	<p>Nether & Upper Poppleton Parish Councils believe that the policy should stipulate that outside the urban area homes of more than two storeys should be discouraged and that more bungalows are required. Sheltered housing and assisted living units should feature in areas where more than 500 homes are to be built. Parking space for two cars within the curtilage on new homes should be considered.</p> <p>Lichfields (on behalf of Hungate (York) Regeneration Ltd) support the policy in principle but believe it should recognise the scope for flexibility on a site by site basis.</p> <p>Rachel Maskell MP comments that it is vital to ensure that housing provision keeps pace with economic demand and that housing tenure should be prioritised to address economic need. High value homes have lowest demand whilst low cost housing to buy or socially rent has the greatest need.</p> <p>Several developers believe that the policy needs to maintain a degree of flexibility as the SHMA considers only 'need' as opposed to 'demand'.</p> <p>General comments to this policy include the prioritising of affordable housing for first time buyers/young families and smaller properties for the elderly looking to downsize. There should be less emphasis on buy to let and large detached properties. Two and three bedroom properties should be focused upon whilst studio and 1 bed apartments should be discouraged as they are not adaptable for families to visit. The building of terraced, low cost, affordable housing would help to provide a better balance of housing.</p>

H4: Promoting Self and Custom House Building

Total respondents: 16 Support: 3 Objections: 7 Comments: 8

Key Issues Raised

Support	<p>Support was shown for this policy by the Green Party and Lichfields (on behalf of Hungate (York) Regeneration Ltd) both supporting the principle of this policy for planning a range of housing types to meet the identified need including the demand for self build plots. The viability and site circumstances should be taken into account when determining the nature and scale of provision.</p> <p>Arup (on behalf of the York Central Partnership) are generally supportive of the principles of Policy H4.</p>
Objection	<p>Selby District Council query the viability of this policy and await further evidence before providing any additional comments on how it may impact on Selby District.</p> <p>Rapleys LLP (on behalf of British Sugar Plc) state there is no provision for self and custom build made within the outline application for ST1 and that it should be made clear that this policy does not relate to ST1. New wording is suggested to reflect this.</p> <p>Integrated Built Environment Ltd have made objections to this policy stating that despite changes to legislation encouraging uptake of self and custom build housing nationally, CYC appears to be operating under outdated practices regarding this policy and that very little has been done to advertise the self and custom build register.</p> <p>Whilst the Home Builders Federation are supportive of self and custom build homes, it believes CYCs approach is restrictive rather than permissive as it requires the inclusion of such housing on strategic sites of 5ha and above and would not help to boost housing supply as is only changes the house building mechanism from one type of builder to another. HBF would like to see the evidence that shows support for those wanting to self-build would actually consider building within the larger sites.</p> <p>Johnson Mowat (on behalf of Redrow Homes, Taylor Wimpey and landowners) object to the need to inset custom build housing on larger sites – those traditionally seeking to build their own homes do not do so on a housing estate and believe that sites of up to 10 dwellings with affordable housing commuted off site are the best vehicle for this approach.</p> <p>A general objection raised the point that the policy does not mention that the plots should be serviced which is vital as plot buyers will have difficulties gaining self build mortgages if not provided. Government guidance states plots should be provided fully serviced.</p>
Comment	<p>Further clarification was also requested by Jennifer Hubbard Town Planning Consultant and questions the meaning of ‘available at competitive rates’ and plots being made available and marketed for ‘at least 12 months’ wording within the policy.</p> <p>Gladman Developments comment that it would be difficult to assess</p>

	<p>how self build plots on allocated sites will be implemented given the issues around working hours, site access and health and safety associated with large scale development sites.</p> <p>Lichfields (on behalf of Hungate (York) Regeneration Ltd) support the principle of this policy for planning a range of housing types to meet identified need. They agree that viability and site circumstances should be taken into account when determining the nature and scale of provision. However, they also point out that it is important that onsite provision of plots for self/custom build would not be appropriate for some sites such as apartment block developments and the policy needs to be amended to contain sufficient flexibility to reflect this.</p> <p>Arup (on behalf of the York Central Partnership) supports this policy in principle but greater emphasis is needed to reflect that the policy may not be deliverable in urban areas and on brownfield sites which are challenging to bring forward. The policy states that on strategic sites developers will be required to supply at least 5% of dwelling plots to self builders, Arup are concerned how this would be achievable on brownfield sites. CYC would need to consider the implications of requesting both Policy H4 and H5 in tandem on a brownfield urban site.</p> <p>GVA (on behalf of the Homes and Communities Agency (HCA)) are concerned that the requirement of 5% of dwelling plots on strategic sites to be available for self/custom build housing would not be feasible on brownfield land where remediation and infrastructure costs can be prohibitive.</p> <ul style="list-style-type: none"> • York Central Action believes the 5% requirement for self/custom build plots should be raised to 10%. <p>A general comment was received in connection with this policy stating that proposals for self build will only work if CYC establishes an appropriate support framework to assist with technical/design/legal/financial issues and simplifies the planning requirements.</p>
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H5: Gypsies and Travellers	
Total respondents: 21	Support: 3
Objections: 11	Comments: 7
Key Issues Raised	
Support	<p>Historic England and Rufforth with Knapton Parish Council support the requirement that sites for gypsies and travellers will only be permitted where they do not conflict with the objective of conserving and enhancing the historic environment including the city's character and setting.</p> <p>Green Party supports the policy.</p> <p>The National Federation of Gypsy Liaison Groups welcome the fact that the Plan recognises the needs of those Gypsies who do not meet the revised definition.</p>

Objection	<p>York Travellers Trust propose a change to ensure that the occupation of permitted sites is limited to G&T as defined in Planning Policy for Traveller Sites, and for those who do not meet that definition, together with any future changes in that definition.</p> <p>Fulford Parish Council states that part b) of the policy should be deleted as there is no provision in national policy that links general housing proposals for the settled community with pitches for gypsies and travellers and part c) should be amended to make clear that traveller/gypsy developments are inappropriate anywhere within the Green Belt.</p> <p>Several developers object to the requirement to address gypsy and traveller provision through the strategic sites.</p> <p>British Sugar plc states that no provision for gypsies and travellers is made within the outline application of ST1. It should be made clear that this does not relate to ST1.</p> <p>York Travellers Trust indicates that Policy H5 of the Plan states that large housing sites are required to make provision for Gypsies and Travellers by providing pitches, land or commuted sums. This represents a significant and essential requirement that needs to be built into the planning of the individual strategic sites, yet it is not mentioned in this site specific policy.</p>
Comment	<p>Selby District Council have requested some clarification as the policy does not state if large scale non-residential sites will be expected to provide for Gypsies and Travellers.</p> <p>Dunnington Parish Council supports the policy but are surprised there is no mention that gypsy and traveller sites are inappropriate development in the green belt.</p> <p>York Travellers Trust welcomes acknowledgement that that appropriate accommodation is needed for both G&Ts who meet definition, and those who do not. CYC should have in place a supply of sites for both groups as they have the same needs and should include sites removed from Green Belt.</p> <p>Two developers/agencies highlight that there is no detail on how the commuted sum for developers of strategic sites would be calculated, the policy is unlikely to satisfy the locational needs of the G&T community and could have a significant impact on the deliverability of development on brownfield land.</p>

H6/SP1: Travelling Showpeople

Total respondents: 45 | **Support: 16** | **Objections: 26** | **Comments: 6**

Key Issues Raised

Support | Historic England support the requirement that sites for gypsies and

	<p>travellers will only be permitted where they do not conflict with the objective of conserving and enhancing the historic environment.</p> <p>Re SP1:</p> <ul style="list-style-type: none"> • Travelling showpeople's family on site have integrated well into the community. Site is proportionate to the needs of the family. • Site is well screened, tidy and unobtrusive. • York Green Party supports site.
Objection	<p>Fulford Parish Council would like part C of this policy reworded as follows: Concerned that Policy does not reflect national policy and also does not include sufficient safeguards to protect existing communities in York from potentially harmful development. Part b) of the policy should be deleted. There is no provision in national policy that links general housing proposals for the settled community with pitches for gypsy and traveller caravans nor is there any local factor that could justify such a link. Part c) should be amended. In particular, : In line with national policy (2015) criterion i) should be altered to make clear that traveller/gypsy developments are inappropriate anywhere within the Green Belt and will only be allowed in very special circumstances. Criterion iv) should state: Ensure that the development does not harm the amenity of nearby existing residents, including by loss of outlook or the creation of unacceptable traffic patterns, noise, disturbance, pollution or air quality. A further criterion should be added requiring reasonable levels of amenity for future occupants.</p> <p>Re SP1:</p> <ul style="list-style-type: none"> • Planning inspectorate allowed temporary use of site for 5 years, then site should be returned to green belt to prevent harm to green belt objectives. Special circumstances no longer apply. • Previous objections ignored. • An alternative brownfield site should be found for this proposal for example, part of ST26.
Comment	<p>Re SP1:</p> <ul style="list-style-type: none"> • Questions why travellers continue to dwell there when site was rejected as residential development. • Planning inspectorate ruled that site should return to green belt in June 2016 • Supports use of the Stables site. Objects to the idea that the site is green belt as has been developed on before, site is kept tidy. Access road to the site is already used by HGVs so the sites trailers and vans will add little congestion.

H7: Student Housing

Total respondents: 15	Support: 1	Objections: 3	Comments: 11
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Key Issues Raised

Support	Support for this policy was expressed from York St John University.
Objection	Fulford Parish Council objected to this policy and suggest that either the first part of Policy H7 is deleted as it simply duplicates other policies

	<p>(ED1, ED2, ED3, and ED4) or is replaced by 'The University of York and York St John University' which must meet the need for any additional student housing which arises because of their future expansion of student numbers. In assessing need account should be taken of firm proposals by independent providers for bespoke student housing in the City. To meet any projected shortfall, provision by the University of York can be made on either campuses.</p> <p>Rachel Maskell MP objects to the policy as the number of student accommodation units planned for Site SH1 is not included.</p>
Comment	<p>Both Nether and Upper Poppleton Parish Councils commented that there was no mention of increases to student housing at Askham Bryan College yet the college boast increasing numbers significantly in its business plan.</p> <p>York Green Party suggests amendment to the first paragraph of the policy and insertion of 'Whenever possible the first recourse for additional purpose built student accommodation should be on campus' – further amendments to the policy were suggested along with the insertion of 'where the cumulative impact of purpose built student accommodation in an area can be shown to be un-balancing the local community' as point iv.</p> <p>Johnson Mowat (on behalf of Redrow Homes, Linden Homes, Taylor Wimpey and other Landowners) commented that student housing should fall outside the OAN and housing supply.</p> <p>General comments were made stating that York University should be encouraged to provide more new accommodation on campus and there should be a minimum percentage of full time students based on campus set at a level above the status quo (ref policies ED1 and ED2).</p>

H8: Houses in Multiple Occupation			
Total respondents: 2	Support: 1	Objections: 1	Comments: 0
Key Issues Raised			
Support	York Green Party support the policy.		
Objection	Fulford Parish Council considers that the thresholds for restrictions on new HMOs should be reduced from 20% to 10% for neighbourhood areas and from 10% to 5% for lengths of street. FPC considers the policy should contain a restriction on extensions to existing and proposed HMOs. Such extensions are often unsightly and out-of-scale with the original house, giving an institutional air to the property. The following is suggested: Extensions to existing and proposed HMOs will only be permitted where it will improve living conditions for residents (such as larger bathrooms and kitchens) and not to provide additional living units.		
Comment	None		

H9: Older Persons Specialist Housing			
Total respondents: 21	Support: 7	Objections: 2	Comments: 12
Key Issues Raised			
Support	<p>Support for the policy was provided by York Green Party, Arup (on behalf of the York Central Partnership) and Lichfields (on behalf of Hungate (York) Regeneration Ltd) also supported the policy commenting it should have some flexibility taking into account site characteristics.</p> <p>Barton Wilmore (on behalf of Barratt and David Wilson Homes) support CYCs intention to deliver specialist accommodation for older persons.</p> <p>Support was also given to the policy by GVA (on behalf of the Homes and Communities Agency (HCA)) as is the inclusion on major sites including York Central (ST5) albeit with further clarity on how older persons housing and affordable housing will be considered on a site specific basis to ensure sites remain viable would be beneficial.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group support Policy H9 and comment that following examination of existing buildings on the QEII Barracks Site there may be potential to adapt a current building for older person's specialist housing.</p>		
Objection	<p>Objection to this policy was provided by Rapleys LLP (on behalf of British Sugar Plc) stating that it has been agreed that predominantly family housing will be delivered on ST1 and that these unit types can provide suitable accommodation for older persons. The British Sugar site should not need to provide specialist housing for older persons and new wording is suggested to the policy to reflect this.</p> <p>Barton Wilmore (on behalf of Barratt and David Wilson Homes) advise that the policy should be caveated to state that it is subject to there being a demonstrated need for such accommodation in the relevant area and subject to viability.</p>		
Comment	<p>Upper and Nether Poppleton Councils have passed comment that the policy is good at suggesting the basis for measurement of housing need for the elderly though this has been overlooked when permitting new old peoples homes – generally these have been sited in or close to business/industrial parks which is inappropriate.</p> <p>Johnson Mowat (on behalf of Redrow Homes, Linden Homes, Taylor Wimpey and landowners) believe the policy needs further clarification on what is required in terms of numbers and types of homes (Use Class 3 or 2). While house builders can provide elderly persons housing under C3, the provision of extra care housing as a C2 use is more complex. The suggestion is made that reference to strategic sites providing homes for elderly needs to reference C3 uses only and the supporting text at paragraph 5.58 needs to inform that C2 development will not count towards the housing supply in the OAHN.</p> <p>The Home Builders Federation need clarity in the wording of this policy</p>		

	<p>making it clear whether proposals for strategic sites (over 5ha) to incorporate provision of accommodation types for older persons refers to Use Class C2 or C3 provision.</p> <p>Jennifer Hubbard Town Planning Consultant states that this policy appears to consider 2 types of housing: 1) General housing suitable for older people (bungalows?), and 2) Specialist housing for older people with particular social, physical or healthcare needs. Is this the case or is it just for older people with specific 'extra' needs?</p> <p>Comment was received from Arup (on behalf of York Central Partnership) giving general support to the approach in this policy. However, further clarity was requested as to how the delivery of both older persons specialist housing and affordable housing delivery will be considered on a site specific basis to ensure that the site remains sufficiently viable and deliverable.</p> <p>A general comment agreed that provision for older persons housing should be made within the plan.</p>
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H10: Affordable Housing	
Total respondents: 50	Support: 12
Key Issues Raised	Objections: 24
Support	Comments: 16
Support	<p>Amongst others Strensall with Towthorpe Parish Council and the Strensall with Towthorpe Neighbourhood Plan Steering Group support the policy</p> <p>CPRE is supportive of the recognition that even sites of two units could deliver a financial contribution</p> <p>Rapleys LLP obo British Sugar PLC support the Council's aspirations to secure 20% affordable housing on Brownfield sites of 15 dwellings or more. A tenure split of 70:30 for Social Rent and Social Discount Sale Dwellings have been agreed for the site. Criterion v. support for the concept of pepper-potting affordable development throughout the development.</p> <p>Lichfields support the inclusion of an open book assessment in instances where the developer believes the policy criteria cannot be fully met.</p> <p>Carter Jonas support the inclusion of a direct reference to vacant building credit (VBC)</p> <p>GVA on behalf of the Homes and Communities Agency (HCA) supports the Policy recognising that development on brownfield land is likely to be able to contribute proportionally less than its greenfield equivalents</p> <p>Amongst others GVA and Rapleys LLP support the concept of pepper-</p>

	<p>potting affordable housing throughout the development</p> <p>Linden Homes note the policy's allowance for open book appraisal to demonstrate that development would not be viable in instances where a developer believes the policy criteria cannot be fully met.</p>
Objection	<p>Several respondents state that the policy is not sufficient to meet the acute need for social rented housing or ensure enough affordable housing is built.</p> <p>The House Builders Federation (HBF) note that the aspiration for affordable housing is not included within the overall housing requirement</p> <p>Rapleys LLP obo British Sugar PLC advocates that the policy should be amended to make it clear that the affordable housing requirement does not relate to ST1, and that the current proposal of no more than two affordable dwellings placed next to one another is overly prescriptive.</p> <p>HBF and Johnson Mowat state the policy makes no reference to the Government's intention to deliver starter homes as part of the affordable homes mix.</p> <p>Johnson Mowat also advocate 25% affordable housing on sites over 5 Ha</p> <p>On respondent seeks a higher affordable housing target of 50% on all sites</p> <p>York Green Party advocate that the affordable housing target should apply to sites under 15 dwellings in both rural and urban sites.</p> <p>ELG Planning objects to the approach to calculating the commuted sum for off site affordable housing provision on non-rural sites.</p> <p>GVA on behalf of the HCA and ARUP on behalf of York Central Partnership (YCP) advocate amending the policy so that the SHMA is used as guidance only in determining the mix of dwelling types and a wider range of tenure is considered.</p> <p>Amongst others GVA and Rapleys LLP state that in relation to pepper-potting the policy is too restrictive and should be more flexible. One respondent expresses concern that there is only one other policy –</p> <p>Exceptional sites in the Green Belt – relating to developments of 2-14 dwellings and that if land can be found it will be only for affordable housing and not a mix of housing</p>
Comment	<p>Several respondents state that affordable housing (including social housing) is much needed</p> <p>One respondent states that affordable housing for owner-occupancy not buy-to-let must be the priority.</p>

Rufforth with Knapton Parish Council state that Development in the parish is not suitable for rented affordable housing due to the lack of services and infrequent public transport.

Jennifer Hubbard Town Planning Consultant queries the meaning the introduction to the policy and criterion (i)

One respondent questions how the plan will provide social and affordable housing to the current and prospective residents of the city.

One respondent questions whether affordable housing numbers will be met as developers will not want to lose profit.

Section 6: Health and Wellbeing

HW1: Protecting Existing Facilities	
Total respondents: 6	Support: 4
Objections: 0	Comments: 3
Key Issues Raised	
Support	<p>Several organisations support this policy.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group supports the re-use of existing community assets. In particular on the QE Barracks site, the community building at Hurst Hall is included and its current usage should be promoted following the departure of the MOD. St Wilfrid's Church is used by the community and its use should be retained.</p>
Objection	No objections made to this policy.
Comment	<p>Arup on behalf of the York Central Partnership states the policy should be evidenced with an up to date Infrastructure Delivery Plan and be modified to remove superfluous requirements in alignment with the Planning Practice Guidance.</p> <p>It was stated that there is no mention of public houses in plan, which are a national concern and need support from development policies. NPPF has planning laws supporting the retention of community pubs.</p> <p>General supports received in relation to facilities being retained and enhanced.</p>

HW2: New Community Facilities	
Total respondents: 22	Support: 6
Objections: 10	Comments: 9
Key Issues Raised	
Support	<p>Several organisations support the policy</p> <p>York Green Party especially support the requirement for an audit of existing community facilities and their current capacity.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group support this policy should the need for additional facilities be identified.</p>
Objection	<p>Rapleys LLP on behalf of British Sugar PLC suggests deleting wording on the provision of new community facilities. Provision of such a facility must accord with CIL Regulation 122 and directly relate to the development, therefore meeting the needs of existing occupiers is not appropriate.</p> <p>Lichfields on behalf of Linden Homes states that it is not clarified in the policy or explanatory text whether the audit of community facilities would be undertaken by the Council or the applicant. If it is the applicant, they object.</p>

	<p>Several developers object to the requirement for all developments of >10 dwellings to be accompanied by an audit of existing community facilities and their current capacity, which is impractical.</p> <p>GVA on behalf of the Homes and Communities Agency (HCA) state that either on-site provision or financial contributions towards off-site provision can be provided dependent on the specific needs of the development and the availability of off-site facilities.</p>
Comment	<p>Wigginton Parish Council comments that there is no library facility in Wigginton or Haxby. Funds have been raised for a new library but CYC needs to ensure that this priority is delivered, especially with the potential increase in population in the area.</p> <p>National Railway Museum support the intent of policy to provide new community facilities, wording could be made clearer.</p> <p>YEF states that walking and cycling routes need to be evaluated by locals rather than planners. Suggests that cycle racks should be made a requirement at venues and bus stops.</p> <p>A resident states that community facilities should have equality policies, minimise paved land, use planted land for edible plants and that developers should support community work.</p> <p>Gladman Developments state that it is important for the evidence base for the local plan to properly assess the viability of all the Plan's policy requirements to ensure consistency with the NPPF.</p> <p>GVA on behalf of DIO Estates (MOD) argue that an audit of community facilities should not be a planning application requirement.</p> <p>Some respondents ask who will be running/ funding new community facilities.</p> <p>Rachel Maskell MP states that new developments must have a community centre located within them.</p>

HW3: Built Sports Facilities			
Total respondents:	Support: 5	Objections: 1	Comments: 8
13			
Key Issues Raised			
Support	<p>Several organisation support the policy.</p> <p>Sport England recognises that the policy is consistent with the NPPF.</p>		
Objection	<p>Arup on behalf of the York Central Partnership objects to needing an audit of existing built sports facilities. Policy should be evidenced through an up to date Infrastructure Delivery Plan and be modified to remove superfluous requirements in alignment with the Planning</p>		

	Practice Guidance.
Comment	<p>YEF supports access to facilities but stresses that buses on weekends and evenings are poor and developers should influence bus companies. Cycle path need joining up and priority given to cyclists at junctions. Current standards for cycling and buses need adjusting. Buses and cycle paths need to be extended at community stadium if it is to be accessible to anyone without a car.</p> <p>An objector states that participation in sport is not determined by physical facilities alone, the text recognises this to an extent but does not go on to develop a policy of community recreation. Small grants, community development work and access to shared insurance would increase participation of women in particular.</p> <p>Gladman Developments state that it is important for the evidence base for the local plan to properly assess the viability of all the Plan's policy requirements to ensure consistency with the NPPF.</p> <p>Lichfields on behalf of Hungate (York) Regeneration Ltd states that the policy requires developers to make a contribution towards new or expanded facilities, however no detail is provided on how this would be calculated. Further clarity is needed and will provide more comments when this detail is available.</p> <p>Several developers state that further detail on the extent of developer contributions is required.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group states that the availability of sports facilities currently used by the MOD must be retained and enhanced for the use of the community.</p>

HW4: Childcare Provision			
Total respondents:	Support: 5	Objections: 6	Comments: 7
16			
Key Issues Raised			
Support	<p>Several organisations support the policy.</p> <p>York Green Party especially supports 'All strategic sites will be expected to conduct an audit of existing childcare facilities and their current capacity.'</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group consider that existing childcare provision in the parish will need to be enhanced as the population increases.</p>		
Objection	<p>Several developers object to impractical requirement for all strategic sites will be expected to conduct an audit of existing childcare facilities. It should be deleted or amended to refer only to strategic sites > 5ha.</p>		
Comment	<p>A number of organisations states that it must be recognised that pre-school childcare provision is provided for by the private sector and</p>		

	<p>therefore it may not be possible to provide specific facilities on sites where a private provider does not wish to open a facility.</p> <p>YEF states that the policy should mention that potential sites for new childcare facilities should have their air quality evaluated, the impact of extra traffic calculated and then compared to the threshold at which air pollution starts to damage the health of small children. Development should not be allowed if pollution is above this threshold.</p> <p>Gladman Developments state that evidence base should assess the viability of all the Plan's policy requirements to ensure consistency with the NPPF.</p> <p>GVA on behalf of DIO Estates (MOD) consider that an audit should not be a requirement as provisions on site could be determined by liaison with CYC.</p> <p>Rachael Maskell MP believes that nurseries should be placed in closer proximity to new developments.</p>
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HW5: Healthcare Services			
Total respondents:	Support: 6	Objections: 5	Comments: 7
17			
Key Issues Raised			
Support	<p>Several organisations support the policy.</p> <p>Support is given to HC1 - expansion of York District Hospital - with York growing we need a bigger and better hospital that can cope with this increase.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group recognise that Primary care facilities in the parish will need to be enhanced as the population increases.</p> <p>NHS Vale of York Clinical Commissioning Group particularly supports the statement at paragraph 6.39 "any new healthcare facilities that are required as a result of additional residential development must be supported through developer contributions".</p>		
Objection	<p>Rapleys LLP on behalf of British Sugar PLC state that there is no requirement for contributions towards improved health facilities on ST1.</p> <p>Several developers object to the requirement that a developer is required to undertake an assessment of accessibility and capacity at the pre-application stage. This should be provided by the health service.</p>		
Comment	<p>York St John University state that if site HC2 is not brought forward for a new mental health facility, the University would like to maintain proposals that site should be allocated as an open space for its sporting activities.</p>		

	<p>Gladman Developments state that it is important for the evidence base for the local plan to properly assess the viability of all the Plan's policy requirements to ensure consistency with the NPPF.</p> <p>A respondent questions why there are no extra healthcare provisions at ST9.</p> <p>Arup on behalf of the York Central Partnership state that the policy should be evidenced with an up to date Infrastructure Delivery Plan and be modified to remove unnecessary requirements in alignment with the Planning Practice Guidance.</p> <p>Rachael Maskell MP highlights that the York Teaching Hospital campus is under strain, and while it is proposed that there is a greater emphasis on community care, this does not mitigate against the need to ensure that there is adequate health care provision in the city.</p> <p>Tees, Esk and Wear Valleys NHS Foundation Trust state that the preferred site for their new mental health hospital should be attributed to the Trust, Tees Esk and Wear Valleys NHS Foundation Trust, and not to the local acute Trust, York Teaching Hospital NHS Foundation Trust.</p> <p>A respondent suggests that the hospital should be expanded or another built.</p>
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HW6: Emergency Services			
Total respondents:	Support: 3	Objections: 5	Comments: 5
12			
Key Issues Raised			
Support	Strensall with Towthorpe Neighbourhood Plan Steering Group, National Railway Museum, and York Green Party support the policy		
Objection	<p>Upper Poppleton Parish Council, Nether Poppleton Parish Council, and Poppleton Neighbourhood Plan Committee question why ST1 has been left out list as there is no alternative provision for emergency services in west York.</p> <p>ELG Planning on behalf of Henry Boot Developments Ltd recognise that ST16: Terry's Extension Sites 1 and 2 has been identified to provide a 'spoke' facility. It is considered that this use at this location would be unsound. Reference to all SS14 Terry's sites should be removed from the policy.</p>		
Comment	<p>Several developers state that further detail on the extent of developer contributions is required.</p> <p>Some representations question the need for a new spoke base as there is an existing ambulance base in town.</p>		

HW7: Healthy Places

Total respondents: 15	Support: 5	Objections: 7	Comments: 4
Key Issues Raised			
Support	<p>Several organisations support the policy.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group state that the masterplan for the QE barracks site must take account of these design principles.</p>		
Objection	<p>Rapleys LLP on behalf of British Sugar PLC argue that a Health Impact Assessment is not required as part of ST1</p> <p>Several developers object to the requirement to provide a HIA on the basis that sites are selected on the grounds of being sustainable, the need for such an assessment is negated by allocation. Policy should be amended so this requirement relates solely to strategic sites >5ha.</p>		
Comment	<p>Yorkshire Wildlife Trust state that a mention of access to semi natural green space should be included in this policy. Suggested amendment to bullet point given to include semi-natural.</p> <p>Sport England suggest that the policy should include a criterion relating to active design in developments. Sport England has produced Active Design Guidance; this builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the ten principles of Active Design.</p> <p>Gladman Developments state that the evidence base should properly assess the viability of all the Plan's policy requirements to ensure consistency with the NPPF.</p>		

Section 7: Education

ED1: University of York			
Total respondents: 3	Support: 1	Objections: 2	Comments: 0
Key Issues Raised			
Support	Strensall with Towthorpe Neighbourhood Plan Steering Group supports the policy which ensures that a university education is available to all.		
Objection	<p>Fulford Parish Council considers that Policies ED1, ED2 and ED3 should be consolidated into one policy. This policy: 1. Does not allow the development of conference facilities unrelated to the university. Policy ED1 currently permits such uses which could significantly intensify usage of the University site to the detriment of surrounding communities. 2. The statement on student housing in Policy ED1 should be significantly strengthened. Instead of simply addressing the need (which in plain English only means looking at and understanding the issue) the University should meet the need arising from future expansion of student numbers. Also there should be no 'let-out clause' about economic prudence in the provision of student housing. The University should meet the needs it is generating in the same way as other forms of development, such as housing. The cost should not fall on nearby local communities. Fulford Parish Council recommends the following rewording: The University of York must demonstrate how the need will be met for any additional student housing which arises because of its future expansion of student numbers. Provision will be expected to be made on campus in the first instance but account can be taken of firm proposals by independent providers of bespoke student housing elsewhere in the City. 3. There should be no maximum limit on the provision of car-parking at the University, at least until the problem of parking on nearby residential roads has been resolved. Fulford Parish Council considers that the main way of doing this is an enforceable Travel Plan which actively discourages the use of private car. Fulford Parish Council suggests the following addition to the ED1: As part of any new significant proposals, the University shall enter into a Travel Plan with enforceable monitoring and delivery arrangements which discourages the use of the private car by staff, students and visitors and promotes the use of public transport. 4. The reference to Proposal ST27 should be deleted as this is a separate policy.</p> <p>York and North Yorkshire Chamber of Commerce notes a disconnect between the broad ambitions in the plan and how they are to be delivered. The Background and Vision acknowledges the importance of the City's two universities to the City's economic strength but later fails to allocate the land the University of York says it requires to accommodate its future growth. The Chamber fundamentally disagrees with the cautious approach to using the baseline forecast to inform the employment land requirements of the Plan.</p>		
Comment	No comments made on this policy.		

ED2: Campus West			
Total respondents: 4	Support: 1	Objections: 3	Comments: 0
Key Issues Raised			
Support	Strensall With Towthorpe Neighbourhood Plan Steering Group supports the policy which ensures that a university education is available to all.		
Objection	<p>Fulford Parish Council considers that Policies ED1, ED2 and ED3 should be consolidated into one policy. This policy: 1. Does not allow the development of conference facilities unrelated to the university. Policy ED1 currently permits such uses which could significantly intensify usage of the University site to the detriment of surrounding communities. 2. The statement on student housing in Policy ED1 should be significantly strengthened. Instead of simply addressing the need (which in plain English only means looking at and understanding the issue) the University should meet the need arising from future expansion of student numbers. Also there should be no 'let-out clause' about economic prudence in the provision of student housing. The University should meet the needs it is generating in the same way as other forms of development, such as housing. The cost should not fall on nearby local communities. Fulford Parish Council recommends the following rewording: The University of York must demonstrate how the need will be met for any additional student housing which arises because of its future expansion of student numbers. Provision will be expected to be made on campus in the first instance but account can be taken of firm proposals by independent providers of bespoke student housing elsewhere in the City. 3. There should be no maximum limit on the provision of car-parking at the University, at least until the problem of parking on nearby residential roads has been resolved. Fulford Parish Council considers that the main way of doing this is an enforceable Travel Plan which actively discourages the use of private car. Fulford Parish Council suggests the following addition to the ED1: As part of any new significant proposals, the University shall enter into a Travel Plan with enforceable monitoring and delivery arrangements which discourages the use of the private car by staff, students and visitors and promotes the use of public transport. 4. The reference to Proposal ST27 should be deleted as this is a separate policy.</p> <p>Historic England notes the increased recognition being given to University of York campus as an example of post-war university campus development (ref Pevsner) advocates change to policy as follows: <i>"Proposals for the redevelopment of existing buildings must be informed by an assessment of their architectural and historic interest and their contribution to the original campus design. Those buildings which are considered to be of architectural or historic interest should be retained or reused."</i></p>		

	A respondent states that the following statement in Policy ED2 is too modest: “maintenance of an adequate internal cycle and pedestrian network which links to entrance points and bus stops;” For the University to be safe, accessible, and non-polluted and, critically for pedestrian and cycle networks to be used second only to public transport , they need to be future-proofed ie <i>“maintenance of an ambitious and future-proof internal cycle and pedestrian network which links to entrance points and bus stops;”</i>
Comment	No comments made to this policy.

ED3: Campus East			
Total respondents: 5	Support: 1	Objections: 4	Comments: 1
Key Issues Raised			
Support	<p>Strensall with Towthorpe Neighbourhood Plan Steering Group supports the policy which ensures that a university education is available to all.</p> <p>O'Neill Associates on behalf of University of York support the principle of allocation for University of York expansion primarily for residential colleges, academic buildings, knowledge based businesses and car parking/infrastructure. Support for employment allocation to meet knowledge-led businesses demand. Support for the site to have restrictions in relation to obligations on the university to encourage student living on campus.</p> <p>Several respondents support the allocation & policy and welcome the movement of land allocated to the University development away from the village. In the same way that the village is protected from the effects of ST15 it should also be protected from this development. In this case the village should be protected not only from vehicular traffic, but also from large numbers of students coming through the village. This need was recognised in the design of Campus East using the lake as a barrier and had been largely successful. Suggested addition <i>'Retain Low Lane as a route for local traffic only. It is essential that there is no vehicular transport or other access from the University to Heslington village along Low Lane to ensure that the setting of Heslington village is to be maintained.'</i></p>		
Objection	<p>Heslington Parish Council states that Heslington still preserves its unique village character despite great pressures from the surrounding expansion of the university. A great deal of care was taken to preserve the character of Heslington and its setting in Green Belt by the creation of a buffer zone between the village and the campus and the creation of a barrier between the campus and the access to the village via Low Lane. This was achieved by careful landscaping of the lakes. Its current use as agricultural land complements the undoubted high environmental status of the university lake and the ground-nesting habitat alongside the lake. This will be lost if the land is developed. The Inspector in his report from the Public Inquiry for the current University expansion particularly comments that the lake and wetland area will provide a</p>		

positive limit to built development to the south of the Heslington East site. If this allocation were to be approved then its use and access must be conditioned so that: There should be no direct vehicular or pedestrian access from the site, when developed, into the village other than via Field Lane. If access from a new road from ST15 connects with ST27 Campus East then no “rat run” opportunity should be available that allows traffic through to Heslington village. The Local Plan should stipulate that the land can only be developed for the university’s own academic purposes, and not be designated as general development land. All existing public routes and Rights of Way should be retained in any completed development.

Fulford Parish Council objects in principle to Proposal ST27. The site of this proposed allocation is an important part of the green buffer along the A64 and as such contributes significantly to the setting and special character of York. It would bring large-scale development almost completely up to the A64, replicating the type of harm already seen at Clifton Moor. Its development would conflict with at least three of the purposes of the Green Belt as set out in NPPF paragraph 80. FPC must respectfully point out that the site of Proposal ST27 was not intended to be developed by the University when it sought planning permission for Heslington East from the Secretary of State. Instead the site was shown as part of the green buffer around the site. It is unclear why the University has changed its mind over such a short period of time, especially as there has been no change in the environmental value of the land. FPC does note that the proposed allocation is actually for “B1b knowledge businesses” rather than to meet any need identified for further university uses which cannot be accommodated on the existing two campuses. To FPC’s knowledge, no substantial case has been made which demonstrates a need for further land for knowledge-based businesses beyond that allowed by the 2006 Secretary of State permission. Even if there is such a need, FPC considers that sites would not have to be immediately adjacent to the University. If ST27 is retained, the following alterations should be made: 1) Criterion iv) should be altered to omit “*which is clearly evidence in terms of demand*” as it is ambiguous in meaning. 2) Criterion v) should be strengthened. High quality sustainable transport is vital to reduce congestion on the local road network and impacts on nearby communities. To ensure this, FPC considers the criterion should be reworded as follows: Deliver high quality frequent and accessible public transport to York City Centre and elsewhere including Campus West. Any proposal must demonstrate that such measures will enable upwards of 15% of trips to be undertaken using public transport. Monitoring and delivery arrangements will be required in a Section 106 Undertaking to ensure that this policy objective is secured in practice. 3) Criterion vii) should be revised so that it applies the stronger NPPF paragraph 32 test as follows: Demonstrate that all transport issues have been resolved, in consultation with the Council and Highways England as necessary, so that the residual cumulative impacts on the surrounding highway network are not severe. The cumulative impact of the proposal with other proposals to the south-east

of York, including ST4 and ST15, should be addressed. 4) Criterion viii) should be either deleted or strengthened. FPC is opposed in principle to a new access onto the A64 because of its harmful impacts on the environment (see below). However if it is to be provided, it is important that ST27 (and the rest of Campus East) makes use of it to benefit local roads. 5) A new criterion should be added so that only businesses linked to the university should be allowed on the site. Otherwise there is a danger that the site is rapidly developed for businesses not genuinely requiring a location adjacent to the university and a case is made in the future for the release of another similar site. FPC suggests the following: Demonstrate that only knowledge-based businesses genuinely requiring a location on or immediately adjacent to the University campus are allowed to occupy premises on the site.

Additionally, Fulford Parish Council considers that Policies ED1, ED2 and ED3 should be consolidated into one policy. This policy: 1. Not allow the development of conference facilities unrelated to the university. Policy ED1 currently permits such uses which could significantly intensify usage of the University site to the detriment of surrounding communities. 2. The statement on student housing in Policy ED1 should be significantly strengthened. Instead of simply addressing the need (which in plain English only means looking at and understanding the issue) the University should meet the need arising from future expansion of student numbers. Also there should be no 'let-out clause' about economic prudence in the provision of student housing. The University should meet the needs it is generating in the same way as other forms of development, such as housing. The cost should not fall on nearby local communities. FPC recommends the following rewording: The University of York must demonstrate how the need will be met for any additional student housing which arises because of its future expansion of student numbers. Provision will be expected to be made on campus in the first instance but account can be taken of firm proposals by independent providers of bespoke student housing elsewhere in the City. 3. There should be no maximum limit on the provision of car-parking at the University, at least until the problem of parking on nearby residential roads has been resolved. FPC considers that the main way of doing this is an enforceable Travel Plan which actively discourages the use of private car. FPC suggests the following addition to the ED1: As part of any new significant proposals, the University shall enter into a Travel Plan with enforceable monitoring and delivery arrangements which discourages the use of the private car by staff, students and visitors and promotes the use of public transport. 4. The reference to Proposal ST27 should be deleted as this is a separate policy.

Historic England states that further consideration needs to be had as to how the growth of this important institution might be delivered in a manner which best safeguards the elements which contribute to the setting of this important historic City.

Additionally, Historic England states that the future expansion of the University should be restricted to within the Campus East and consideration should be given to the expansion of the university in a northerly direction onto site ST4 instead. Notwithstanding stated policy caveats, development could harm 2 elements which contribute to the special character and historic setting of the City, notably: the site's prominence in relation to the A64 - development would fundamentally change the relationship which the southern edge of York has with the countryside to its south. It will alter people's perceptions when travelling along this route about the setting of the city within an area of open space, and may not be successfully mitigated through 'landscaping' (previously amounting to alien earth bunding); the expansion would alter the relationship of York to its surrounding villages, in terms of distance, scale and the fact that they are free-standing and clearly definable settlements. The development would reduce the gap between the city and ST15 to 1.6km.

York Green Party questions the sustainability of the expansion site ST27 and adding to current parking pressures. 'Upwards of 15% by public transport' is far too low a target even allowing for walking and cycling for more local trips around the university area. Direct access from the A64 (in conjunction with ST15) is likely to promote a higher level of trips by car, again exacerbating parking pressures. It would be preferable to explicitly state that this allocation will be dependent on a public transport link as part of a master plan for both sites (ideally a tram connection to serve the new garden village, the extension and campus east linking in due course to campus west and the city centre).

O'Neill Associates on behalf of the University of York objects to the disparity between the existing planning permission on campus east for up to 25ha of employment floorspace (likely to be 5.75ha / 57,500 sqm single storey) to 21,500 sqm (equating to 2.33 - 3.16 ha) in policy SS22 and ED3. The policy needs to be altered to clarify that the existing permitted 25 ha of business at 23% footprint on campus East stands plus 21,5000 sqm at the extension. Wording suggested: *"up to 25 ha of knowledge-based businesses including research-led science park uses are permitted on the existing campus plus 21,500 sqm of such uses on the extension. With the agreement of the City Council, this capacity can be located across either or both the campus and extension"*. The contradiction between ED3 and EC1 needs to be clarified to allow the campus extension. Also the size of the allocation should revert to 2014 position (28 ha - option 1 presented).

O'Neill Associates on behalf of the University of York suggests an alternative ST27 boundary - (Option 1) 2014 version of 28ha with an external buffer of around 30ha. This would provide 26ha of developable land and negates need for landscape buffer in allocation. Preferred option thought to be most successful to meet the University's needs in the long-term. 2ha remains outside of university control. Likely to have a strong landscape scheme with high quality open parkland setting with

wide southern buffer area. Principally the campus will be seen from the south east although the 64 corridor acts as a visual barrier. Accepted that there will be significant change in landscape character at Heslington East from open agricultural land to areas of large scale built development. No impacts on views to Heslington although some panoramic views. Also likely to have strong green belt boundaries along historic field pattern. Detailed landscape principles are recommended. Parkland setting key to mitigating landscape changes similarly to Campus East. Site would cater for 3 x residential colleges and research-led business activity linked to the university.

O'Neill Associates on behalf of the University of York suggests an alternative ST27 boundary - (Option 3) 32 ha extending the 2017 allocation further south including a landscape buffer of 7.5ha. This would incorporate a 7.5 ha buffer leaving 22.5 ha of developable land. 2ha remains outside of university control. Principally the campus will be seen from the south east although the 64 corridor acts as a visual barrier. Accepted that there will be significant change in landscape character at Heslington East from open agricultural land to areas of large scale built development. Relationship to campus is similar to the current boundary although larger scale development and open parkland setting likely to be accommodated. A major inhibitor would result from the proximity to the A64 and visibility; A considerable buffer/ noise barrier to the A64 would be required providing glimpsed views to campus. The Views to Heslington would not be interrupted. Detailed landscape principles are recommended. Parkland setting key to mitigating landscape changes. Site would cater for 3 x residential colleges and research-led business activity linked to the university.

O'Neill Associates on behalf of the University of York's main objection relates to the policies which strongly support the University's continued expansion are not translated into adequate land allocation for expansion. The 14ha of development space proposed for the next 20 years will not provide the security which the university needs for long term planning and therefore will not meet the Council's own policies on growth of the University and expansion of the York economy. Taking into consideration space planning it is considered that 23.8 ha of developable land is required to 2032/22 and 28 ha to 2038 to allow for green belt permanence (2014 boundary with landscape buffer). Current allocation therefore hinders ability to respond to future requirements and need. The policy should reference knowledge based business in addition to other higher education and related uses.

Object to the boundary proposed in 2017 (Option 2 referred to in response) as they consider that this would require an internal buffer to the A64 (5.5ha) and therefore only allow a 14 ha of developable land. This is likely to put pressure on the Green Belt boundaries in the long-term by inadequately allocating land for the University in the long-term; this would meet 50% of development needs. Alternative boundaries suggested show that there is little difference between the sites in terms of visual effects. Principally the campus will be seen from the south east

although the A64 corridor acts as a visual barrier. Accepted that there will be significant change in landscape character at Heslington East from open agricultural land to areas of large scale built development. Considered that this would have a weaker relationship to campus given only part developed on the south eastern part of the lake. Western edge include 2ha of land outside of university control. Would mean smaller scale development with only one area of openspace - limited parkland setting. Detailed landscape principles are recommended. Evidence submitted includes location plans and visual assessment for alternative options and masterplan document.

A number of other representations were received, covering a number of issues.. The University has not yet used up available space at Heslington East campus. There is more than sufficient undeveloped land on that site to meet its needs. Conditions on the permission for Heslington East campus should still apply, i.e. a buffer zone maintained between the campus and Heslington - these have been breached by permission to allow a health centre, shops and food outlets in the buffer zone. Allowing employment space on land adjacent to the A64 is breaching the buffer zone again. Employment space on this land adjacent to the A64 suggests the possibility of a separate access/egress point to this road and could lead to traffic entering Heslington along an improved Low Lane and using the Village as a short cut. Heslington would be almost completely enclosed by the campus and its environs - the pleasure of the countryside and rural feel would be lost to its inhabitants.

The Inspector's report to the Heslington East Public Inquiry states that development expansion of the University on Heslington East should not cross Low Lane in order to protect Heslington Village. Further removal of Green Belt/prime agricultural land in this area seriously compromises this open land setting.

Any new access from the proposed new development site West of Elvington Lane must run closely alongside the A64 to avoid harming open farmland or views to and from Heslington village.

The proposed student housing will impact on the historic individuality of York. The View from the A64 is already denigrated by the new University building. Nothing will reduce the eyesore of student accommodation infill up to the road.

CYC needs to consider the impact on the setting and special character of the City. The cumulative impact of developments like this one will be disastrous. York already has a serious traffic / congestion issue. York's special character is just related to the walled City or conservation areas - views from the outer ring road are also important particularly where they include views of the Minster. ST27 is an important part of the green buffer along the A64 and contributes to the special character of York. Additionally, the development would result in increased noise and

	<p>disturbance in an area greatly valued by local residents. The combined result would destroy the character of the Green Belt, and significantly increased traffic congestion - large scale development would be almost up to the A64, the A19 is already near max capacity and the special character of Fulford Conservation Area would be damaged.</p>
Comment	<p>O'Neill Associates on behalf of University of York states that University growth supports economic growth in York as set out through the policy by increasing numbers of staff and businesses on campus.</p> <p>Heslington Village Trust states that movement of the site away from the village is welcome but as with ST15 the village must be protected from both vehicular traffic and students coming through the village (a need that was recognised in the planning consent granted for Heslington East where using the new lakes as a barrier has been successful). Any new access from ST15 must run closely adjacent to the A64 to minimise harmful impacts on open farmland and views to / from Heslington.</p> <p>O'Neill Associates on behalf of the University of York states that the university campus East has permission for 65 ha of development land of which 35ha has been developed over the last 10 years and 30 ha remains undeveloped. Proposals for 5ha of further development is anticipated in the next 5 years. The University is a long-term presence and requires land for expansion over the time frame of the plan. Uptake of employment uses on 25ha allocated in Campus East to date has been slow. Growth in students over the last 10 years has been from 5300 to 16000 and it is likely to keep growing. the university supports 3,900 staff. Changes to government funding have resulted in the university planning more specifically for the future. Key to size are growing departments, growth in international foundation programmes for internal students and growing long distance learning. Continued success of the university is fundamental to York's economy. Projected need for the future for student accommodation includes 2 colleges in the short-term and 3 more in the long-term to 2032; extra 3 colleges cannot be accommodated on existing campus. Employment use buildings such as The Catalyst needs car parking with close proximity. Access from the A64 in conjunction with ST15 may be attractive for business users. Principally the campus will be seen from the south east although the 64 corridor acts as a visual barrier. Accepted that there will be significant change in landscape character at Heslington East from open agricultural land to areas of large scale built development as per the Campus East.</p>

	<p>O'Neill Associates on behalf of the University of York is confident that car parking across Campus East and the new extension will be accommodated within the existing planning permission as only 27% of maximum of current permission provided. University of supportive of connectivity to the A64 alongside ST15. No vehicle access proposed through Heslington.</p> <p>Northern Power Grid states that the potential need for network reinforcement for connections to this proposed development site to accommodate the additional load but the level of detail available in the plan is not sufficient to quantify the extent at this stage of development. EHV infrastructure reinforcement may be required for this site. This may have impacts on development timescales so it is advisable that as soon as developers have details of their developments location and electrical capacity requirements they submit an application for connection to Northern Power Grid so they can provide a quotation for the connection and details of any reinforcement and/or diversion works that may be required.</p> <p>York Ramblers state that at the eastern edge of this site there is an outer urban footpath link from Hopgrove to Escrick. Would appreciate maintaining a green way alongside the site rather than a path along boundary buildings. Same applies to Green Lane which leads down to Grange Farm. There should certainly be a green buffer and trees to screen the development somewhat from the A64. Agrees that the 23% footprint should include car parking and access roads.</p> <p>A number of respondents commented regarding access to ST27 and asking what measures are proposed to ensure access to the site will be limited to Para 3.96 page 71. Also, questions were raised about the site will be accessed from Hull Road. Several access points were suggested. It was also noted potential link to ST27 via A64. Would support a new junction beside ST27 rather than anything further west as minimises destruction of farmland and provides University with direct link to A64.</p>
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HW4: Childcare Provision			
Total respondents: 16	Support: 5	Objections: 6	Comments: 7
Key Issues Raised			
Support	Several organisations support the policy.		

	<p>York Green Party especially supports 'All strategic sites will be expected to conduct an audit of existing childcare facilities and their current capacity.'</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group consider that existing childcare provision in the parish will need to be enhanced as the population increases.</p>
Objection	Several developers object to impractical requirement for all strategic sites will be expected to conduct an audit of existing childcare facilities. It should be deleted or amended to refer only to strategic sites > 5ha.
Comment	<p>A number of organisations states that it must be recognised that pre-school childcare provision is provided for by the private sector and therefore it may not be possible to provide specific facilities on sites where a private provider does not wish to open a facility.</p> <p>YEF states that the policy should mention that potential sites for new childcare facilities should have their air quality evaluated, the impact of extra traffic calculated and then compared to the threshold at which air pollution starts to damage the health of small children. Development should not be allowed if pollution is above this threshold.</p> <p>Gladman Developments state that evidence base should assess the viability of all the Plan's policy requirements to ensure consistency with the NPPF.</p> <p>GVA on behalf of DIO Estates (MOD) consider that an audit should not be a requirement as provisions on site could be determined by liaison with CYC.</p> <p>Rachael Maskell MP believes that nurseries should be placed in closer proximity to new developments.</p>

ED4: York St John University, Lord Mayor's Walk Campus			
Total respondents:	4	Support:	3
Objections:	2	Comments:	0
Key Issues Raised			
Support	<p>St John University supports this policy</p> <p>Historic England supports the requirement that future development needs to take account of its sensitive setting (opposite the City Walls, partly in Conservation area and including a number of listed buildings). Note that supporting text should also reference Policy D10.</p> <p>Strensall With Towthorpe Neighbourhood Plan Steering Group supports the policy which ensures that a university education is available to all.</p>		
Objection	York Green Party states that whenever possible the first recourse for additional purpose built student accommodation should be on campus. Not convinced that on-campus student provision should be reduced.		
Comment	No comments made to this policy.		

ED5: York St John University, Further Expansion			
Total respondents:	1	Support:	1
Objections:	0	Comments:	0
Key Issues Raised			
Support	<p>York St. John University supports policy ED5 and the allocation of student housing (SH1) at Heworth Croft.</p> <p>HCA support the policy's general intent.</p>		
Objection	<p>One respondent objects to more student accommodation (SH1 – Land at Heworth Croft).</p> <p>One respondent states that the replacement sports provision has been double counted for this site and H56, there is not enough land at Haxby Road to replace H56 alone or (H56 & SH1). Also wishes to participate in any public inquiry in order to put concerns to the inspector directly about the unsound plan.</p>		
Comment	<p>Historic England has no objection to the principle of allocating the site (SH1 – Land at Heworth Croft). Policy should state that development proposals for the area would need to ensure that those elements which contribute to the significance of the Heworth Green/East Parade/Huntington Road Conservation Area are not harmed.</p>		

ED6: Preschool, Primary and Secondary Education			
Total respondents:	9	Support:	4
Objections:	1	Comments:	4
Key Issues Raised			
Support	<p>Amongst others, York Green Party and Strensall with Towthorpe Neighbourhood Plan Steering Group support the policy, with the latter adding that the policy ensures sufficient pre-school, primary and secondary education facilities including open space and sports areas are available to the growing population.</p> <p>GVA on behalf of the Homes and Communities Agency (HCA) support the intent of the policy in encouraging the optimum density for housing.</p> <p>Rapleys LLP stated it is committed to the provision of suitable on-site educational facilities and off-site contributions as necessary in accordance with the CIL Regulations 122 on ST1</p> <p>The Education & Skills Funding Agency (ESFA) welcomes the inclusion of policy which addresses the issue of providing new schools.</p>		
Objection	<p>ESFA advocates the policy should be expanded to outline access to good schools and range of schools to choose from.</p> <p>Johnson Mowat states that further detail on the extent of developer contributions is required.</p>		
Comment	<p>Arup on behalf of the York Central Partnership (YCP) has a concern about the lack of up to date evidence for school planning which should</p>		

	<p>be demonstrated in an up to date Infrastructure Delivery Plan.</p> <p>Arup on behalf of the YCP Seeks further clarity as to the intent and purpose of the policy and whether it is intended to deliver educational facilities as part of its strategic sites.</p>
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ED7: York College and Askham Bryan College	
Total respondents: 5	Support: 2
Objections: 1	Comments: 4
Key Issues Raised	
Support	<p>Directions Planning on behalf of Askham Bryan College supports policy ED7, recognising the contribution Askham Bryan College makes to economic growth, creating a quality educational offer within York. The college has had a programme of expansion over recent years which will add to its growth and increasing number of students attending the college, and provide extra courses. The college is also expanding its current programme of wildlife conservation.</p> <p>Strensall With Towthorpe Neighbourhood Plan Steering Group supports the policy which ensures a wide range of further education is available to provide the growing need for different courses such as apprenticeships etc.</p>
Objection	<p>Directions Planning Consultancy on behalf of Askham Bryan College are concerned with the extent of the Askham Bryan College designation on the Proposals Map, which are out of date, following planning permissions granted over the last few years and the extent of the College's campus. The area between the yellow shading and the A64 now has planning permission for a Wildlife and Animal Conservation Management area, which include a number of permanent buildings on site, as well as being a teaching area for College students and schools. Therefore, it should be within the College designation.</p>
Comment	<p>Directions Planning on behalf of Askham Bryan College welcome the recognition within the Plan, within paragraph 1.57, policy DP1 and policy ED7, of the contribution Askham Bryan College makes to economic growth, addressing imbalances in the demographics of the district, and creating a quality educational offer within York. The wording of Policy ED7 is therefore supported. However, we are concerned with the extent of the designation shown on the Proposals Map, which we feel is out of date given the planning permissions that have been granted over the last few years and the actual extent of development on the College's campus. In particular, the area shown on the Proposals Map between the yellow shading and the A64 now has planning permission for a Wildlife and Animal Conservation Management. This area has a number of animal houses that are buildings of a permanent nature. There are proposals to extend the number of animal houses in the future. The area is an important teaching resource for students, because it provides them with the opportunity to learn, and care, for a wide variety of species. It also provides an opportunity for schools to access the teaching resource. This area is, therefore, an important element of the existing</p>

	<p>teaching facilities of the College, and so it should be included within the extent of the campus designation shown on the Proposals Map.</p> <p>Several developers state that further detail on the extent of developer contributions is required.</p>
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ED8: Community Access to Sports and Cultural Facilities on Education Sites			
Total respondents:	4	Support:	1
		Objections:	0
		Comments:	3
Key Issues Raised			
Support	Strensall with Towthorpe Neighbourhood Plan Steering Group supports the use of education facilities for the community.		
Objection	No objections made to this policy.		
Comment	Several developers state that further detail on the extent of developer contributions is required.		

Section 8: Placemaking, Heritage, Design and Culture

D1: Placemaking			
Total respondents:	Support: 5	Objections: 1	Comments: 9
13			
Key Issues Raised			
Support	<p>York Civic Trust supports the policy context, essential for a city of the global and historic significance of York. Suggests that some of the specific wording of para 1.52 could strengthen the impact of policy wording.</p> <p>Historic England supports policy approach, ensuring elements which contribute to the special character of the City are safeguarded. Particularly welcome the requirement that development proposals that fail to take account of York's special qualities, fail to make a positive contribution to the City, or cause damage to the character or quality of an area will be refused.</p> <p>York Green Party Strongly support this broad approach. Regarding Iv Building Heights and views, add "<i>In general existing tall buildings will not be modified to include more modern additional accommodation on top of existing roofscape unless it can be clearly demonstrated that this is essential for the viable conversion of the building to its new use.</i>"</p> <p>Lichfields on behalf of Hungate (York) Regeneration Ltd support the need to achieve high quality design on development schemes in York.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group supports the policy and would expect the contents of the policy to be incorporated into a masterplan for the QE barracks site.</p>		
Objection	<p>Rapleys LLP on behalf of British Sugar PLC objects to no clear definition within the policy in supporting text of York's special qualities or the significance of the historic environment, leaving it ambiguous and unclear. Deleted wording suggested.</p>		
Comment	<p>York Georgian Society and Conservation Areas Advisory Panel suggest that, as the Plan promotes garden villages as part of its development strategy, policy should reference best practice as exemplified at New Earswick reflecting the first Garden Village movement. Example should be included in "The study of adjacent settlements in particular New Earswick...in the area should be undertaken." Also, pg 145 point v 'Character and Design standards' - alter 'appropriate building materials' to 'compatible building materials'. Pg 147 alter "Suitable building materials" to "Compatible building materials". Note other detailed comments.</p> <p>Design Standards Paragraph (Para 8.11) excellence in workmanship should be added as a requirement. Should include encouragement for proposed developments over a certain size to consult the Yorkshire and</p>		

	<p>Humber Design Review Panel before submitting a planning application to ensure the best design possible.</p> <p>Questions what the intended function of 'City of York Streetscape Strategy and Guidance 2014. Is it intended to be an SPD under D1 iii)?</p> <p>GVA on behalf of DIO Estates (MOD) states clarity should be provided to define the level of detail required at outline planning application stage for sites adjacent to conservation areas in terms of 'Full design details' required.</p> <p>York Minster support emphasising the visual dominance of Minster. CPRE - North Yorkshire state place making should apply to all development proposals and will be essential in the development management process to aid sustainable development and to protect and enhance the special character of York.</p>
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D2: Landscape and Setting			
Total respondents:	Support:	Objections:	Comments:
12	5	2	5
Key Issues Raised			
Support	<p>York Civic Trust and Historic England support the proposed policy approach.</p> <p>York Green Party welcome this policy and the cross reference to Green Infrastructure</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group supports policy and expect the contents of the policy to be incorporated into a masterplan for the QE barracks site.</p> <p>CPRE - North Yorkshire states that the recognition of the importance of landscape and setting via this policy is especially welcomed.</p>		
Objection	<p>Rapleys LLP on behalf of British Sugar PLC state there is no clear definition within the policy or supporting text as to the meaning of York's special qualities. The mature landscaping has been retained in relation to British Sugar where possible in the context of the re-profiling remediation works.</p> <p>Gladman Developments Policy states policy should be reworded in order to be fully compliant with the NPPF as the impact on the landscape is one factor that should be considered by the decision maker when determining planning applications.</p>		
Comment	<p>Canal & River Trust welcome the inclusion of water sensitive design, though believe should expand on what this is to make the policy effective. Suggests adding: <i>'Development should improve access to, along and from the waterway/ Development should optimise views and natural surveillance of the waterway/ Development should not have an adverse impact on the amenity of the waterway by virtue of noise, odour</i></p>		

	<p><i>or visual impact'.</i></p> <p>Johnson Mowat on behalf of Redrow Homes, K Hudson, Linden Homes, Taylor Wimpey and G M Ward Trustees state they have been unable to locate the York Landscape Character Appraisal mentioned. This needs to be made available in the evidence base documents.</p> <p>It cannot be presumed that the removal of trees and hedgerows can be offset by planting new ones as the ecology of these can take decades to develop and new ones may not have the same ecology.</p>
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D3: Cultural Provision			
Total respondents:	Support:	Objections:	Comments:
12	4	7	2
Key Issues Raised			
Support	<p>York Civic Trust, Arup on behalf of the York Central Partnership and the National Railway Museum support policy.</p> <p>York at Large sub-group support the recognition of the concepts of cultural wellbeing, cultural capacity and the requirement on significant sites for a Cultural Wellbeing Plan. These would potentially place York in the forefront of national best practice. Suggest further collaborative working to articulate, refine and make practicable the ideas and policies within the current Plan.</p>		
Objection	<p>Lichfields on behalf of Hungate (York) Regeneration Ltd state he policy implies that it is the responsibility of the developer to undertake an audit of existing facilities to determine whether additional provision is required. This is the responsibility of the council.</p> <p>Rapleys LLP on behalf of British Sugar PL, ELG Planning on behalf of Henry Boot Developments Ltd and Arup on behalf of the York Central Partnership state it is not considered necessary for a Cultural Wellbeing Plan to be undertaken on all strategic sites. It should be done on a plan wide level. Policy should be amended so this requirement applies only to strategic sites > 5 ha.</p> <p>Johnson Mowat on behalf of Redrow Homes, K Hudson, Linden Homes, Taylor Wimpey and G M Ward Trustees object to request that strategic sites will need to assess current status and need relating to culture and provision as this is a task that only the Council can perform.</p>		
Comment	<p>York lacks public art. It would be beneficial to actively require the</p>		

	<p>provision of public art for new developments of a certain size / value. This is perhaps reflected in D3 but could be strengthened.</p> <p>Does not understand the thought process behind this policy, it appears unclear and easy to meet as majority of developments will already meet the last two points (3 and 4).</p>
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D4: Conservation Areas			
Total respondents:	9	Support:	3
Objections:	3	Comments:	3
Key Issues Raised			
Support	<p>York Civic Trust and York Green Party support policy approach.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group state any development must enhance existing conservation areas and consideration should be given to the unique development at Strensall Park adjacent to the QE Barracks site in order to protect its heritage and history.</p>		
Objection	<p>Historic England support policy but note that it does not reflect the advice of NPPF; suggests replacing with "<i>Development proposals within or affecting the setting of a conservation area will be supported where they: i) are designed to preserve or enhance those elements which contribute to the special character or appearance of the Conservation Area; ii) it would enhance or better reveal the significance of the Conservation Area or would help secure a sustainable future for a building of risk within it; iii) are accompanied by an appropriate evidence based assessment of the conservation area's special qualities, proportionate to the size and impact of the development and sufficient to ensure that impacts of the proposals are clearly understood. Outline planning applications for development within or affecting the setting of a Conservation Area will only be supported if full design details are included sufficient to show the likely impact of the proposals upon the significance of the Conservation area. Changes of use will be supported where it has been demonstrated that the original use of the building is no longer viable or appropriate and where the proposed new use would not harm the significance of the area. Harm to buildings, open spaces, trees, views or other elements which make a positive contribution to a Conservation Area will be permitted only where this is outweighed by the public benefits of the proposal. Substantial harm or total loss to the significance of a Conservation Area will be permitted only where it can be demonstrated that the proposal would bring substantial public benefits.</i>"</p> <p>Gladman Developments state policy is not consistent with the NPPF in the treatment of Heritage Assets.</p> <p>Barton Wilmore on Behalf of Barratt and David Wilson Homes suggest part (i) of the policy is not the correct test for assessing development</p>		

	which affects a conservation area. The Planning (Listed Buildings and Conservation Areas) Act 1990 states that developments within conservation areas should “preserve or enhance” the asset. The policy states that “outline planning applications for development within or adjacent to conservation areas will only be supported if full design details are included”. This should be deleted from the policy.
Comment	<p>York Georgian Society and Conservation Areas Advisory Panel suggest inserting in the last sentence of Pg 152, para 8.26 "<i>Alteration and conversion schemes should respect the scale...</i>"</p> <p>This policy should include more NPPF wording relating to changes of use and loss of community benefit (See Historic England Guidance: Heritage Listing Advice Note 7)</p>

D5: Listed Buildings			
Total respondents:	7	Support:	2
		Objections:	3
		Comments:	2
Key Issues Raised			
Support	Strensall with Towthorpe Neighbourhood Plan Steering Group and York Green Party support.		
Objection	<p>York Civic Trust supports policy. Suggests rewording: "...will be generally supported only where they: i. can be shown..."; further text to be added to ii) to strengthen 'understanding': "...are accompanied by a heritage statement that clearly sets out the evidence for the historical and architectural significance of the building. Only where the asset is thoroughly understood can the impact of the proposals be judged and a justification for them made.". Cite Conservation Principles at para 8.29; deposit heritage statements with the HER; amend para 8.30 by changing the wording to "<i>like for like repairs in terms of precise design and proportions and materials</i>"; given recent cases, make explicit reference to the need for Listed Building Consent.</p> <p>Historic England supports policy but it does not reflect the advice of the NPPF, suggests replacing with :- "<i>Development proposals affecting a Listed Building or its setting will be supported where they: i) preserve those elements which contribute to the special architectural or historic interest of the building or its setting. The more important the building, the greater the weight that will be given to its conservation; ii) would enhance or better reveal the significance of a Listed Building or will help secure a sustainable future for a building at risk; andiii) are accompanied by an appropriate evidence based assessment of the significance of the building, proportionate to the size and impact of the Yes, a development and sufficient to ensure that impacts of the proposals are clearly understood. Changes of use will be supported where it has been demonstrated that the original use of the building is not longer viable or appropriate and where the proposed new use would not harm its significance. Harm to an element which contributes to the significance of a Listed Building or its setting will be permitted only where this is outweighed by the public benefits of the proposal. Substantial harm or total loss of a Listed Building will be permitted only</i></p>		

	<p><i>where it can be demonstrated that the proposal would bring substantial public benefits."</i></p> <p>Gladman Developments states policy is not consistent with the NPPF in the treatment of Heritage Assets.</p>
Comment	<p>It is important that Listed Buildings are used and maintained to stop them becoming derelict and that new development maintains the setting of Listed Buildings.</p> <p>York contains a high number of highly graded buildings, Historic England should therefore be identified as a key delivery partner.</p>

D6: Archaeology			
Total respondents: 7	Support: 4	Objections: 2	Comments: 1
Key Issues Raised			
Support	<p>York Civic Trust and York Green Party Strensall with Towthorpe Neighbourhood Plan Steering Group support.</p> <p>GVA on behalf of DIO Estates (MOD) supports the need for a heritage statement to describe the significance of archaeological remains and request that it should be clear that this requirement should be to support a planning application only.</p>		
Objection	<p>Historic England supports policy but does not reflect the advice of the NPPF. Suggests deleted policy and replacing with:- "<i>Development proposals that affect archaeological features and deposits will be supported where they are: i) accompanied by an evidence-based heritage statement that describes the significance of the archaeological deposits affected and includes a desk-based assessment and, where necessary, reports on intrusive and non-intrusive surveys of the application site and its setting; including characterisation of waterlogged organic deposits, if present; ii) would not result in harm to the significance of the site or its setting; iii) designed to enhance or better reveal the significance of an archaeological site or will help secure a sustainable future for an archaeological site at risk. Harm to an element which contributes to the significance of a Scheduled Monument or other nationally important remains will be permitted only where this is outweighed by the public benefits of the proposal. Substantial harm or total loss of a Scheduled Monument or other nationally-important remains will be permitted only where it can be demonstrated that the proposal could bring substantial public benefits. Harm to archaeological remains of less than national importance will only be permitted where the benefits of the development outweigh the harm having regard to the scale of the harm and the significance of the archaeology. In those cases where development affecting an archaeological site is acceptable in principle, detailed mitigation measures will need to be agreed with the City of York Council that include, where appropriate, provision for deposit monitoring, investigation, recording, analysis, publication, archive deposition and community involvement"</i>.</p>		

	Gladman Developments states policy is not consistent with the NPPF in the treatment of Heritage Assets.
Comment	Mentions D6: iii - use of the word unavoidable - should this be ' <i>outweighed by the public benefit of the development</i> ' or similar? Harm is always avoidable through refusing development.

D7: The Significance of Non-Designated Heritage Assets			
Total respondents:	Support: 3	Objections: 3	Comments: 4
Key Issues Raised			
Support	<p>York Civic Trust generally support the policy's approach.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group supports the policy to ensure that any non-designated assets are protected especially those with community significance.</p> <p>CPRE - North Yorkshire state that a separate policy dealing with the significance of non-designated Heritage Assets is welcomed especially in an area containing such historic assets and often deemed less important than others.</p>		
Objection	<p>Historic England support but note that policy needs to clearly differentiate the approach that the Council will take to applications affecting non-designated heritage assets compared to designated heritage assets. Suggests deleting the first Paragraph and replacing with:- "<i>Development proposals affecting a non-designated heritage asset or its setting will be supported where they conserve those elements which contribute to its significance. Developments which would remove, harm or undermine the significance of such assets, or their contribution to the character of a place will only be permitted where the benefits of the development outweigh the harm having regard to the scale of the harm and the significance of the heritage asset</i>"</p> <p>Jennifer Hubbard Town Planning Consultant states that the policy and the explanation at paragraph 8.35 are back to front. Without a Local Heritage List (paragraph 8.36) it is open season for anyone to claim that a site or building is or is not an un-designated Heritage Asset. If the LPA considers a building or site to be an un-registered Heritage Asset, it should justify this by some then it may be appropriate for an applicant to assess any development proposals against the criteria identified in the policy.</p> <p>Gladman Developments states policy is not consistent with the NPPF in the treatment of Heritage Assets.</p>		
Comment	<p>York Georgian Society and Conservation Areas Advisory Panel suggest text amends to bring policy in closer alignment with SPD consulted on in 2012.</p> <p>York Green Party suggests to add bullet point in the policy specifically mentioning SPD Local Heritage List.</p>		

	Asks when the local list of heritage assets is to be finalised to enable it to play a material role in planning decisions.
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D8: Historic Parks and Gardens			
Total respondents: 6	Support: 2	Objections: 2	Comments: 2
Key Issues Raised			
Support	York Civic Trust and Strensall with Towthorpe Neighbourhood Plan Steering Group supported the policy.		
Objection	<p>Historic England fully supported the thrust of the policy but felt it needs to make it clear that it is dealing with only those landscapes that are Registered (other non-designated landscapes would fall within the provisions of Policy D7). It also needs to set out the considerations that would be taken into account when determining proposals which would be likely to harm such landscapes, and include and positive support for proposals which would enhance their significance. Suggested deleting policy D8 and replacing with: - "Policy D8: Registered Historic Parks and Gardens Development proposals affecting a Registered Historic Park and Garden or their wider setting will be supported where they: i. do not harm the layout, design, character, appearance or setting of the Park or Garden, key views into or out from the Park; ii. are sensitive to the original design intentions and subsequent layers of design and the functional evolution of the park or garden and do not prejudice any future restoration iii. would enhance or better reveal the significance of the Historic Park and Garden or would help to secure a sustainable future for a feature within it. Harm to an element which contributes to the significance of a Registered Historic Park and Garden will be permitted only where this is outweighed by the public benefits of the proposal. Substantial harm or total loss to the significance of a Registered Historic Park and Garden will be permitted only where it can be demonstrated that the proposal would bring substantial public benefits."</p> <p>Gladman Developments objected as the policy is not consistent with the NPPF in the treatment of Heritage Assets.</p>		
Comment	York Georgian Society and Conservation Advisory Panel both commented referencing para 8.28, suggesting a check should be made on whether the gardens at Bishopbarns in St George's Place, and at Goddards Tadcaster Road, are also included on the List of Historic Parks and Gardens.		

D9: City of York Historic Environment Record			
Total respondents: 2	Support: 2	Objections: 0	Comments: 0
Key Issues Raised			
Support	Historic England and York Civic Trust both support this policy.		
Objection	No objections made to this policy.		
Comment	No comments on this policy.		

D10: York City Walls and St Mary's Abbey Walls (York Walls)			
Total respondents:	4	Support:	3
Objections:	0	Comments:	1
Key Issues Raised			
Support	York Civic Trust and York Green Party support this policy. Historic England support subject to suggested change to Criterion i) to read "...the elements which contribute to their significance and the six principle characteristics of the City as identified in the Heritage Topic Paper."		
Objection	No objections made to this policy.		
Comment	Yorkshire Wildlife Trust commented that paragraph 8.48 could include enhancement of biodiversity around the walls.		

D11: Extensions and Alternations to Existing Buildings			
Total respondents:	6	Support:	3
Objections:	0	Comments:	3
Key Issues Raised			
Support	Historic England, York Civic Trust and Strensall with Towthorpe Neighbourhood Plan Steering Group support this policy.		
Objection	No objections made to this policy.		
Comment	York Georgian Society and Conservation Areas Advisory Panel suggest text of para 8.49/8.50 is amended to refer to impact of development on designated assets.		

D12: Shopfronts			
Total respondents:	4	Support:	4
Objections:	0	Comments:	0
Key Issues Raised			
Support	Historic England, York Civic Trust and Strensall with Towthorpe Neighbourhood Plan Steering Group support this policy. York Green Party support this policy, suggest adding reference to retaining and repairing historic features including signs, clocks etc.		
Objection	No objections made to this policy.		
Comment	No comments on this policy.		

D13: Advertisements			
Total respondents:	6	Support:	2
Objections:	2	Comments:	2
Key Issues Raised			
Support	Historic England supports this policy. York Civic Trust supports this policy, suggests additional reference to 'A' boards as other forms of advertising are explicitly mentioned. Concerned that reference to 'exceptions' in para 8.59 could result in unsightly advertisements of the type that the Council is clearly seeking to remove.		
Objection	York Museums Trust object; whilst recognising the need for appropriate and sensitive signage, more flexibility would be welcome in order to		

	<p>generate trade and income for heritage buildings. Many people are put off by historic buildings and without signage they will not enter and use the facilities.</p> <p>British Signs and Graphics Association object, as the policy only partly reflects the requirements of the legislation and national planning policy advice. Some parts of the draft policy and supporting text remain incorrect and other parts could be improved and simplified. Paragraphs 8.58 are overly prescriptive, suggested wording was given in relation to the policy and supporting text.</p>
Comment	<p>Strensall with Towthorpe Neighbourhood Plan Steering Group notes that the policy does not include reference to 'temporary advertising'.</p> <p>York Green Party felt reference should be added to traditional (non illuminated) hanging signs attached to buildings being considered as alternative to A boards within the city centre where they are justified to direct customers into side streets.</p>

D14: Security Shutters

Total respondents: 3	Support: 3	Objections: 0	Comments: 0
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Key Issues Raised

Support	Historic England, York Civic Trust and Strensall with Towthorpe Neighbourhood Plan Steering Group support this policy.
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Objection	No objections made to this policy.
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Comment	No comments on this policy.
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Section 9: Green Infrastructure

GI1: Green Infrastructure			
Total respondents:	Support:	Objections:	Comments:
11	6	0	6
Key Issues Raised			
Support	<p>Historic England supports this policy and, especially, the recognition, in Criterion v, of the contribution which the City's heritage assets make to the Green Infrastructure network.</p> <p>This policy is supported by several respondents including Yorkshire Wildlife Trust and GVA on behalf of DIO Estates (MOD) and Strensall with Towthorpe Neighbourhood Plan Steering Group who supports the policy to ensure the protection of existing green areas which will include SSSIs, SACs and SINCs as well as smaller green spaces in the community.</p> <p>CPRE - North Yorkshire welcome this policy in its entirety, particularly point vi) to extend current networks where possible. Recognition in the supportive text that a green infrastructure system approach to assessing biodiversity, open space and areas of public realm as one entity are not just in isolation is considered a best practice methodology and is supported.</p>		
Objection	No objections made to this policy.		
Comment	<p>Yorkshire Wildlife Trust suggests there could be further detail as to the appropriate planting in new areas of Green Infrastructure. The provision of an SPD on GI and Biodiversity would be supported.</p> <p>Sport England indicates that sport does happen in areas with landscape protection designations; landscape protection does not necessarily rule out a sporting event taking place. Sport England considers that it is important that the policy recognises the sporting events that take place and do not introduce policies that could restrict such events happening.</p> <p>Several developers suggest further detail on the extent of developer contributions is required.</p> <p>Friends of Holgate Community Garden urge the council to protect Holgate community Garden and Park from development as part of the York Central "southern option" access road. Mentions the ward lacking green space, that the garden is an Asset of Community Value and its importance for recreational amenity.</p>		

GI2: Biodiversity and Access to Nature			
Total respondents:	Support:	Objections:	Comments:
7	2	1	5
Key Issues Raised			
Support	Yorkshire Wildlife Trust and Strensall with Towthorpe Neighbourhood		

	Plan Steering Group support the policy.
Objection	<p>Lichfields on behalf of Wakefield Properties state the Princess Road site and southern part of Southfields Road site are identified as SLIs however they highlight that there is no clear justification for this so the designation should be removed.</p> <p>The plan commits to maintaining water quality in the Ouse and Derwent. The respondent strongly suggests extending the same commitment to the River Foss.</p>
Comment	<p>Yorkshire Wildlife Trust supports the policy of achieving net gain in biodiversity through developments and suggests it will be necessary to account for losses of habitat and the total area of habitat created. They state it would be valuable to ensure that the assessment of biodiversity on development sites is done to a consistent standard. A biodiversity SPD would be a valuable addition and include Green Infrastructure.</p> <p>Canal & River Trust welcomes parts v and vi of the policy to protect and enhance biodiversity.</p> <p>Several developers suggest further detail on the extent of developer contributions is required.</p>

GI3: Green Infrastructure Network

Total respondents: 7	Support: 3	Objections: 0	Comments: 5
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Key Issues Raised

Support	Yorkshire Wildlife Trust, Historic England, Strensall with Towthorpe Neighbourhood Plan Steering Group support the policy which ensures the protection of the green infrastructure network which is a key element of the special character of the historic City.
Objection	No objections made to this policy.
Comment	<p>Yorkshire Wildlife Trust indicates that Green Corridors are valuable city and region wide. The policy could contain a reference to connecting up Green Corridors as part of co-operating with Neighbouring authorities. They also note that Green Corridors are valuable within and between developed areas.</p> <p>Several developers indicate further detail on the extent of developer contributions is required.</p> <p>CPRE - North Yorkshire whilst supportive of the text within GI3 dealing specifically with Green Infrastructure Networks, CPRENY believe this policy could be incorporated in Policy GI1 to avoid duplication and provide an more detailed first policy.</p>

GI4: Trees and Hedgerows

Total respondents: 7	Support: 2	Objections: 4	Comments: 2
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Key Issues Raised

Support	Yorkshire Wildlife Trust and Strensall with Towthorpe Neighbourhood
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	Plan Steering Group support the policy to ensure protection of existing trees and hedgerows.
Objection	<p>Several Developers query why a developer contribution is required to protect existing trees and hedgerows.</p> <p>Rapleys LLP on behalf of British Sugar PLC indicate that the British Sugar application seeks to ensure the retention of all mature trees where possible in the context of the need to remediate the site. This policy should recognise that such landscaping should be retained wherever possible in the context of the necessary infrastructure provisions for the future development. Alternative wording given to criterion ii.</p>
Comment	<p>Historic England supports this policy especially the requirement, in the third bullet-point, that trees which contribute to the character of a Conservation Area or Listed Building or are an element of a designed landscape should be retained. However, as currently worded, this aspect of the Policy only applies to trees which contribute to the setting of a Conservation Area. In many cases, there are trees within the Conservation Area itself which contribute to its character. It would also be preferable to use the term “positive contribution” since this more closely reflects the terminology of the NPPF. Policy GI4 Criterion iii amend to read:- “... retains trees and hedgerows that make a positive contribution to the character or setting of a Conservation Area, to the setting of a Listed Building, ... etc”</p> <p>Yorkshire Wildlife Trust indicates the policy could have a presumption in favour of planting native trees and hedgerow plants in new developments. It could also specify adequate buffers for hedgerows within developments.</p> <p>York Green Party suggest the policy should also include a reference to the development of a city wide Tree Strategy aiming to increase tree cover in York in line with the objectives of Treemendous.</p>

GI5: Protection of Open Space and Playing Fields

Total respondents: 9 | Support: 2 | Objections: 5 | Comments: 3

Key Issues Raised

Support	<p>Strensall with Towthorpe Neighbourhood Plan Steering Group and Fulford Parish Council support the policy to ensure provision of open spaces and playing pitches to meet the needs of the community.</p> <p>Fulford Parish Council supports showing areas at School Lane, Fordlands Road and north and south of Broadway as open spaces under GI5. They feel consideration should be given to their designation as Local Green Spaces under paragraph 77 of the NPPF. Wishes to note that the pre-publication draft does not designate any Local Green Spaces within the city and considers that there should be a city-wide assessment of all green spaces to ascertain whether LGS designation is</p>
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	appropriate.
Objection	<p>Directions Planning on behalf of Joseph Rowntree Housing Trust suggest that on the Proposals Map, the land to be protected by Policy G15 is annotated to make clear the land to which the Policy applies. Within the village of New Earswick, certain areas of land have been identified as being subject of the Policy G15, including land to the west of Red Lodge off Haxby Road, south of Limetree Avenue and north of the car parking serving the Folk Hall. This area of land has been the subject of a planning application to develop a new care home with independent living accommodation. The planning application also included proposals for the relocation of the MUGA and tennis club facilities to other locations within New Earswick. As a consequence of the permission that was granted under the reference 165/00758/FULM, the current extent of open space within this central area to the village is to be altered. Construction of New Lodge is to commence in November 2017 with completion phased over approximately 18 months. Consequently, it would be appropriate for the Local Plan Proposals Map to show the extent of the open space incorporated into the development given construction is likely to be near completion (or even completed) by the time the Local Plan has been adopted. If the development is ignored then the Local Plan will be out of date before it is even published. Included is a drawing showing the approved scheme, kindly requests that the Proposals Map is updated to reflect the approved scheme.</p> <p>Sport England object to the policy on the following grounds: The policy seems to only cover playing pitches that are of recreational importance; importance is very subjective and there is no definition in supporting text as to what defines 'importance'. The policy is therefore imprecise - Sport England would object to this element of the policy unless the reference to importance was omitted; Further, as currently worded the policy appears to only apply to pitches. Sport England would therefore object until the policy's scope is clarified - this could be achieved by referring to pitches as including playing field in the Glossary of terms, or by changing the name of the policy from 'pitches' to 'playing field'.</p> <p>Rapleys LLP on behalf of British Sugar PLC indicate as part of the planning application for British Sugar there has been a commitment to providing a combination of on-site sports pitches, open space and playing pitch provision and contribution to off-site facilities. The timescales for the delivery of off-site facilities are in the control of the council. This should not delay the redevelopment of ST1 where appropriate timescales for the off-site replacement are committed to via a s106 agreement. There is no definition within the policy or its supporting text as to the precise meaning of the words area of benefit. This must be precisely clarified. New wording suggested.</p>
Comment	<p>Sport England understands that York is about to commence with a new Playing Pitch Strategy following Sport England's latest methodology. The policy should refer to this most up to date evidence base.</p> <p>Johnson Mowat on behalf of Taylor Wimpey, Johnson Mowat on behalf</p>

	<p>of Redrow Homes and Trustees and Johnson Mowat on behalf of Redrow Homes and Linden Homes. queries why a developer contribution is required to protect existing pitches from development?</p> <p>Paragraph 9.16 states there is a presumption against the loss of open space, this needs to be made more of a priority as many open spaces are under threat.</p>
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GI6: New Open Space Provision	
Total respondents: 20	Support: 6
Key Issues Raised	
Support	<p>The National Railway Museum (NRM), and GVA on behalf of the York Central Partnership (YCP) supports the policy as it matches the ambitions of the YCP to provide significant areas of open space.</p> <p>Arup on behalf of the YCP supports the principle of the policy – all development should contribute to open space.</p> <p>Nether Poppleton Parish Council, Upper Poppleton Parish Council and the Poppleton Neighbourhood Plan Committee support the new open space proposals for the Poppleton area at at the new Manor Academy site and the site adjacent to the Poppleton Junior Tigers Soccer Field (note further comment re local plan map)</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group Supports the policy if a need for additional open spaces is identified.</p> <p>Lichfields welcomes the provision for flexibility within the policy in terms of off-site provision being acceptable in the circumstances identified.</p>
Objection	<p>The NRM advocates the policy recognise and include the need for flexibility.</p> <p>Rapleys LLP state that British Sugar is committed to the appropriate provision of new open space provision, but the provision of such facilities must accord with the CIL Regulations 122 and must directly relate to the site itself. Furthermore, the reference in this policy to addressing deficiencies is not appropriate and should be deleted.</p> <p>Lichfields state that the policy lacks clarity on the open space requirements sought</p> <p>Lichfields and GVA on behalf of the HCA advocate that the policy should be reworded to include open space standards, to provide clarity on the open space requirements sought.</p> <p>GVA on behalf of the HCA advocate that the policy should state that the precise type of on-site provision required will depend on the size and location of the development proposal and existing openspace provision</p>

	<p>The NRM and GVA on behalf of the HCA advocate that the policy should include the need for flexibility dependent on the characteristics of the York Central site.</p> <p>Johnson Mowat advocates that further detail on the extent of the developer contributions is required and states there is no justification for criterion iii) that requires further land beyond the boundaries of strategic sites</p> <p>One respondent is concerned about allocation OS10 and the removal of land from food production and its environmental impact for open space, advocating alternative locations should be identified.</p> <p>Sport England advocates an additional criterion that makes clear off-site provision will be acceptable where a robust and up to date Playing Pitch Strategy and Built Sports Facility Strategy identify the need for such facilities.</p>
Comment	<p>Nether Poppleton Parish Council, Upper Poppleton Parish Council and Poppleton Neighbourhood Plan Committee state there appears to be a typographical error as the sites are not properly numbered in relation to the Poppleton neighbourhood plan and the local plan policies map.</p> <p>DPP Planning states that Developers of site ST9 do not object to providing open space on the Site and the southern part of the Site might end up being the most appropriate location but the Developers feel that this should be determined by the master planning process, the Developers are concerned with the inter relation of policy SS11 and G16 and how this might impact on the capacity of ST9. The Developers reserve the right to comment in more detail on this matter when the details of the Council's intentions are fully understood. DPP Planning highlight Policy G16 indicates that new open spaces to the south of site ST9 will be complemented by further on-site provision of local green and open space. Policy G16 appears to be the principle policy for the provision of open space. It is difficult to see how further on-site provision of local green and open space can be required by policies other than G16. They also highlight that the allocation identified as OS9 is about 9ha in size - a significant quantum of open space, adding that large tracts of additional open DPP Planning states space would erode the developable area of the Site.</p>

G17: Burial and Memorial Grounds			
Total respondents:	3	Support:	1
		Objections:	1
		Comments:	1
Key Issues Raised			
Support	Strensall with Towthorpe Neighbourhood Plan Steering Group supports the policy to ensure sufficient space is available for extension and/or enhancement of burial grounds.		
Objection	One respondent believes a separate section to the policy should be added in relation to green or woodland or pet burial grounds in rural areas.		

Comment	Wigginton Parish Council passed comment that further increased development within the area will increase the need for burial facilities.
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Section 10: Managing Appropriate Development in the Green Belt

GB1: Development in the Green Belt	
Total respondents: 10	Support: 6
Key Issues Raised	Objections: 5
Comments: 3	
Support	<p>Yorkshire Wildlife Trust support the policy for maintaining the Green Belt around York.</p> <p>Dunnington Parish Council supports this policy to protect the setting of the village and its green approaches.</p> <p>Historic England supports this Policy especially Criterion iii. This will help to ensure that any development in the Green Belt safeguards those elements which contribute to the special character and setting of the historic City.</p> <p>York Green Party generally supports this policy, but with following amendment: minerals extraction, provided high environmental standards are attainable and including all the safeguards specified in the Minerals and Waste Plan.</p> <p>Strensall With Towthorpe Neighbourhood Steering Group supports the Policy, to ensure that inappropriate development is not carried out in the Green Belt.</p> <p>NTR Planning (on behalf of McArthur Glen, Aviva Investors & York Designer Outlet) support the identification of Park & Ride facilities as being appropriate in the Green Belt in Policy GB1 / para 10.14</p>
Objection	<p>Fulford Parish Council objects to the policy as it should follow more closely the format of paragraph 89 of the NPPF. In particular, it should not make reference to renewable energy schemes being potentially appropriate forms of development. The NPPF is clear (paragraph 91) that most such projects would comprise inappropriate developments. There are no special circumstances in York to justify a different view. Indeed large renewable energy projects in the Green Belt have the potential to cause major damage to the setting and special character of the historic city.</p> <p>Turnberry Consulting (on behalf of York Racecourse) considers the Green Belt designation to be unduly restrictive and any works within the main area of the racecourse are deemed 'inappropriate development'. Former national policy allowed for 'major developed sites in the green belt' which was reflected in the 2005 version of the local plan. Other sites previously identified as 'major developed sites' such as the designer outlet and Askham Bryan College are removed from the green belt in this version of the plan. Request that the area of the racecourse previously identified as a major developed site, should be removed from</p>

	<p>the green belt as it does not serve green belt purposes.</p> <p>Jennifer Hubbard Town Planning Consultancy states that this policy as drafted is inconsistent with NPPF Green Belt guidance. Appeal Inspectors have in some instances treated roads as inappropriate development in the Green Belt since vehicles using them would detract from the openness. Any built development within the General extent of the Green Belt is bound to encroach to some degree on the countryside. As drafted, the policy precludes most forms of built and other development in the Green Belt whether appropriate by definition or not. Paragraph 10.4: No justification for removing permitted development rights from residential developments - the GDPO does not preclude extensions in the Green Belt, so why should York? Paragraphs 10.8 & 10.10: These paragraphs need reconsidering (and GB1 amending if necessary). There are a significant number of buildings in the open countryside round York which can be converted to residential or business use or from business use to residential either as permitted development or within policy, resulting in a development which can be less visually acceptable. Policy GB1 should facilitate redevelopment in these circumstances (It may be that the 7th bullet point of the policy is intended to achieve the same objective - please advise if this is the case)</p> <p>Jennifer Hubbard Town Planning Consultancy states that policy GB1 and paragraphs 10.8 and 10.10 amended to facilitate redevelopment where this would lead to an overall improvement in the character and appearance of the Green Belt without compromising openness (in conjunction with the deletion of criterion 'iv' of policy GB3)</p> <p>Jennifer Hubbard Town Planning Consultancy asks how is the word 'limited' to be interpreted in the 4th-7th bullet points of the policy? In relation to the 3rd bullet point, is this one house? In relation to the 5th bullet point, some guidance of scale should be provided - 40%, 50%, 100% - should it be volume or footprint? There is no case for limiting 'alterations' to existing buildings. It is assumed that 'limited' in relation to affordable housing means limited to the local needs identified - if so, the word 'limited' should be omitted</p>
<p>Comment</p>	<p>Yorkshire Wildlife Trust supports for maintaining the Green Belt around York. However it is important that the protection of areas of Green Belt which are arable land, which is low in biodiversity and does not support or buffer important semi-natural areas do not receive more protection than brownfield land with high value for biodiversity.</p> <p>Jennifer Hubbard Town Planning Consultancy states that in terms of the 9th bullet point (essential engineering operations) it is appreciated this is included to safeguard the Council's interests at Harewood Whin, but who is to determine whether engineering operations are essential? Essential to whom? Is an embanked slurry lagoon or a large concrete hardstanding on a farm essential?</p>

	Other another respondent object to development on Green Belt to retain recreational and social activities.
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GB2: Development in Settlements 'Washed Over' by the Green Belt	
Total respondents: 4	Support: 1
Objections: 3	Comments: 1
Key Issues Raised	
Support	Strensall With Towthorpe Neighbourhood Plan Steering Group supports the policy, where villages are washed over by the Green Belt. Consideration should be given within this policy to identify such villages.
Objection	<p>Fulford Parish Council objects to the proposal to exclude the York Designer Outlet from the Green Belt. Instead, the site should be shown as washed over and treated as a previously developed site in the Green Belt. It would be subject thereby to the restrictions on development set out in the last bullet-point of NPPF paragraph 89 which allows development compatible with the site's status as previously developed and its location within the Green Belt. Goes into detail explaining why including the Designer Outlet in the Green Belt would be consistent with the history of the site. Excluding the site from the Green Belt allows unrestricted development within the boundaries of the inset (subject to other policies in the plan), this will likely lead to a loss of much of the landscape setting of the Designer Outlet which at present mitigates impacts of existing built development upon the wider Green Belt.</p> <p>Jennifer Hubbard Town Planning Consultant states that no justification is provided for washing over certain settlements (eg. Naburn - this is not a village where the open character of the village makes an important contribution to the Green Belt) - see NPPF para 86. Such settlements should be inset based on their merits and all villages currently washed over should be reassessed to ensure compliance with NPPF para 86.</p> <p>A respondent objects to the Green Belt boundary washing over Clifton Gate Business Park. It is considered that this will be restrictive to expansion of existing businesses in future as GB policy applies.</p>
Comment	Jennifer Hubbard Town Planning Consultant states that there is some confusion between Policy GB2 criterion iii and the explanation following 10.18. If 'infilling' is to be interpreted as the filling of a small gap in an otherwise built up frontage then perhaps it would be helpful to qualify this by limiting the number of dwellings to perhaps 1 or 2. The policy & explanation would be acceptable as drafted if the washed over villages were all loose knit settlements with gardens, paddocks and other breaks between buildings but in general they are not. Most villages surrounding York do not justify being washed over and all should be looked at again.

GB3: Reuse of Buildings			
Total respondents: 3	Support: 2	Objections: 1	Comments: 0
Key Issues Raised			
Support	Rufforth With Knapton Parish Council states there are a number of buildings within the parish which come under the category set out in		

	<p>GB3 and therefore support the policy.</p> <p>Strensall With Towthorpe Neighbourhood Plan Steering Group states that the policy is supported to reuse existing buildings located in the Green Belt unless the design is such that it impacts on the openness of the Green Belt.</p>
Objection	<p>Jennifer Hubbard Town Planning Consultant states that Permitted Development Regulations which permit the conversion of agricultural buildings to dwellings do not require the buildings to be within 800m of a defined settlement limit & there is no sound reason for criterion 'vii' of the draft policy. Additionally, there is something wrong with the wording of criterion 'iv' which requires the character of the building to be in keeping with the character of the building - assume its a typo? However, it appears to be the intention of the criterion to prevent re-use of buildings which are not entirely in keeping with their surroundings - is this what is intended? If so, how can it be sustainable to prevent the re-use of a permanent & substantial construction because it is not of a sympathetic design? Consequently this criterion should be deleted and Policy GB1 and paragraphs 10.8 and 10.10 amended to facilitate redevelopment where this would lead to an overall improvement in the character and appearance of the Green Belt without compromising openness.</p>
Comment	No comments on this policy

GB4: 'Exception' Sites for Affordable Housing in the Green Belt			
Total respondents: 3	Support: 1	Objections: 1	Comments: 1
Key Issues Raised			
Support	Strensall With Towthorpe Neighbourhood Plan Steering Group supports the policy, as it will enable the building of affordable homes on housing site H59.		
Objection	Jennifer Hubbard Town Planning Consultant states that rural exceptions sites should be located immediately adjacent to a settlement, not up to 800m from it - how is this sustainable for those in need? Furthermore, once detailed Green Belt boundaries are established in an adopted Plan, the opportunities for developing such sites are greatly restricted. Criterion 'iii' provides an opportunity for pockets of 100% affordable dwellings being dotted around the open countryside, not connected with any settlement - is this really what is intended?		
Comment	Fulford Parish Council has no objection to the principle of this policy - however it requires clarification to prevent abuse: 1) Criterion i) should be amended to make clear that it applies only to existing rural communities. This is to avoid exception sites being put forward on the edge of the main urban area. 2) An additional criterion should be added to prevent exception sites being allowed on particularly sensitive areas of the Green Belt such as those shown by Figure 3.1. The wording of Policy H5 could be reused: Do not conflict with the objective of conserving and enhancing York's historic and natural environment. This includes the city's character and setting and internationally, nationally		

	and locally significant nature conservation sites, green corridors and areas with an important recreational function.
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Section 11: Climate Change

CC1: Renewable and Low Carbon Energy Generation and Storage			
Total respondents: 15	Support: 2	Objections: 10	Comments: 4
Key Issues Raised			
Support	<p>Strensall with Towthorpe Neighbourhood Plan Steering Group supports the policy.</p> <p>Arup on behalf of the York Central Partnership is supportive of the policy in principle.</p>		
Objection	<p>Kexby Parish Council objects to all potential wind farms as they are inappropriate within the Vale of York. It also advocates that solar panels should not be placed on agricultural land, rather they should be placed on the roofs of industrial premises and incorporated in roofing of new build residential properties.</p> <p>Rachel Maskell MP advocates that York should be aiming to become a zero-carbon city, which will require it to find ways of generating its own renewable energy and sites need to be set aside to enable this to happen.</p> <p>Gladman Developments state that the requirement for a 28% reduction in carbon emissions goes beyond the target emission rate of Part L of the Building Regulations.</p> <p>ELG Planning objects to the requirement for reduction in carbon emissions of at least 28% as the justification for this figure is not clear they also object to the requirement for strategic sites to produce energy masterplans, as this is disproportionate and impractical for the three sites that compromise the ST14 Terry's Extension Sites. The requirement should only apply to strategic sites >5ha.</p> <p>Arup along with GVA on behalf of the York Central Partnership advocate that 28% reduction in carbon emissions is too inflexible. ARUP also seek additional detail as to how this should be balanced against the overall viability of the scheme. They also advocate the need for further clarity regarding how energy masterplans would be flexible enough for sites with long build out where energy technologies might be substantially different at the end of the build out period.</p> <p>Johnson Mowat objects to the policy being applied to strategic sites, as the viability report suggests it does not apply. More clarity is needed particularly because Para. 5.4.7 informs that no costs have been allocated to this requirement as the Carbon Trust noted further work is required.</p> <p>Rapleys LLP states that there was no requirement for the production of an Energy Masterplan when the Sustainability and Energy Statements</p>		

	<p>were submitted for ST1 in support of the application, and it should be noted that was not and is not a requirement that should be applied to British Sugar. They advocate that the policy does not make it clear what the 28% reduction relates to and should be deleted – alternative wording suggested.</p>
Comment	<p>The Yorkshire Wildlife Trust is supportive of all efforts to reduce the emissions of gases which increase global warming. They advocate that the policy should specify specific high standards for housing developments. They believe the phrase within the policy 'New buildings must achieve a reasonable reduction in carbon emissions of at least 28%' is not a meaningful phrase or target and is unlikely to lead to energy efficient developments.</p> <p>North Yorkshire County Council suggests that proposed developments (housing, retail, factory, business parks) should plan for the installation of equipment or suitable provision of ducting at the onset to enable the latest technology to be deployed, and not leave it to be installed by third parties once the development is complete. When development is planned, discussion with mobile operators should be undertaken as part of the initial planning stages, and where additional masts are required, they should be built as part of the infrastructure and not left to be provided later. York's aspirations as a Gigacity and the increasing capacity and use of communications technology can potentially have a significant impact on the way people choose to live and work and play within the city. The Plan may seek to recognise that the boundaries of these activities are becoming increasingly blurred and therefore flexibility and connectivity may become increasingly crucial to ensuring future vitality and use of the City Centre assets.</p> <p>Jennifer Hubbard Town Planning Consultant states the phrase within the policy 'New buildings must achieve a reasonable reduction in carbon emissions of at least 28%' needs to be clarified and queries what constitutes 'reasonable'.</p> <p>York Green Party comments that, for new developments, the cost of installing ground source heat systems is significantly lower if done at the time of groundworks when other utilities are installed. They therefore believe all new developments should assess and factor in the whole life cost of installing ground source heat pumps and higher levels of insulation against the requirement for linking to district heating networks. Where ground source heat provision would be more cost effective, this should be installed.</p>

CC2: Sustainable Design and Construction of New Development

Total respondents: 19 | Support: 5 | Objections: 14 | Comments: 1

Key Issues Raised

Support	The Environment Agency is pleased to see that water efficiency guidelines have been followed and the consideration of the Humber River Basin Management Plan in the Plan, and would encourage any
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	<p>projects that would help improve the status of a water body.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group and CPRE North Yorkshire support the policy.</p> <p>Arup on behalf of the York Central Partnership (YCP) generally supports the policy.</p> <p>York Green Party fully support policies which require maximum permissible uplift in energy efficiency and renewable generation and believes there should be a commitment to uprate all targets on an annual basis, in line with national and international policies and scientific evidence.</p>
<p>Objection</p>	<p>The Environment Agency recommend a policy is inserted that ensures the requirements of the Water Framework Directive are adhered to, where appropriate, and suggest a point is included within Policy DP2 or Policy CC2 to ensure that appropriate water efficiency measures are secured for developments.</p> <p>Historic England states there may be historic properties where it is impossible to attain BREEM 'Very Good' or 'Excellent' standards without compromising elements which contribute to their significance. The Policy should recognise that these standards would only be a requirement where they can be achieved in a manner consistent with the appropriate conservation of that asset. They also include a suggested amendment to the Policy relating to Conversion of Existing Buildings and Change of Use.</p> <p>York Green Party advocates that Para. 11.16 should make reference to rainwater and greywater recycling having dual benefit of reducing consumption of clean water supplies and reducing discharge rates to watercourse.</p> <p>Amongst others, Northminster Business Park states it is unreasonable to require new non-residential buildings over 100m² to achieve BREEAM "Excellent" rating Furthermore, Directions Planning states that it is unreasonable to require all non-domestic buildings over 100m² to score at least 70% on the BREEAM rating.</p> <p>Gladman Developments state that the policy is not consistent with current Government advice. Barton Willmore (obo Barratt and David Wilson Homes) concurs, adding that the requirements to achieve at least a 19% reduction in Dwelling Emission Rate and a water consumption rate of 110 litres per person per day are already governed within Building Regulations, so they should not be included in the plan. They state that the policy should be deleted as it is not justified and fails to meet the tests of soundness.</p> <p>Johnson Mowat objects to the 19% reduction in Dwelling Emission Rate as it goes beyond building regulations that are constantly being updated</p>

	<p>and improved, so there is not case for York to run a parallel process.</p> <p>ELG Planning object to the absence of any justification for the requirement that all new residential buildings should achieve at least a 19% reduction in Dwelling Emission Rate compared to Target Emissions Rate, adding it is also unclear how this target relates to the target in policy CC1 for all new buildings to achieve a 28% reduction in carbon emissions.</p> <p>GVA on behalf of the Homes and Communities Agency and Jennifer Hubbard Town Planning Consultant state the policy is too prescriptive and inflexible, Jennifer Hubbard Town Planning Consultant adds it is unlikely to be deliverable particularly in so far as it applies to small scale developments, adding that there are no gas supplies to many parts of the rural areas of the District.</p> <p>Arup on behalf of York Central Partnership advocate that flexibility is incorporated into the policy to enable the policy requirements for a 19% reduction in Dwelling Emission Rate, water consumption rate of 110 litres per person per day, BREEAM 'Excellent' target or BREEAM Communities Assessment to be general guideline rather than a prescribed requirement.</p>
Comment	Rachael Maskell MP observes that not only should all new build seek to draw minimal energy, but through micro-generation, buildings have a real opportunity to feed into the grid, whereas open spaces can also be used for renewable energy generation.

CC3: District Heating and Combined Heat and Power Networks			
Total respondents: 12	Support: 2	Objections: 7	Comments: 3
Key Issues Raised			
Support	<p>Strensall with Towthorpe Neighbourhood Plan Steering Group support the policy where CCHP and CHP can be provided to new and possible existing developments.</p> <p>York Green Party supports the policy especially for developments that are close to the existing network at University of York (ST27 and ST4).</p>		
Objection	<p>Jennifer Hubbard Town Planning Consultant states the policy is too prescriptive and unlikely to be deliverable particularly in so far as it applies to small scale developments, adding that there are no gas supplies to many parts of the rural areas of the District.</p> <p>Gladman Developments states the Policy is not consistent with current Government advice, adding that the requirement for all new development to either connect to or be connection ready for Combined Heat and Power or District Heating systems is unjustified and unduly onerous.</p> <p>Johnson Mowat objects to this policy as according to para 11.33, the 300 dwellings threshold would mean that the requirement applies to all</p>		

	<p>strategic sites. The installation will impact upon the delivery of other elements of social infrastructure. They also object on the basis that energy efficiencies are already sought under Policy CC2 and as demonstrated in Table 5.12 of the viability report the cost of Policy CC3 would be an extra £3,396 to a typical 3 bed house. The Plan contains no good examples of where such a system has been successfully installed on a large housing site.</p> <p>ELG Planning objects to the requirement that all new developments are required to connect to CHP2 distribution networks as there is very limited access to such networks in the city at present and limited prospect of such networks being constructed in the near future. In absence of such networks it is unreasonable and disproportionate for the council to require developers on all sites to go to the expense of undertaking relevant energy studies and making all new developments 'connection ready' whilst they will still have to provide individual facilities for each new dwelling.</p> <p>Arup on behalf of the York Central Partnership has significant concerns regarding the implementation of Policy CC3. The supporting text suggests that the heat network feasibility study undertaken on behalf of the Leeds City Region for York Central is financially viable. They are concerned that the technical study undertaken does not have regard to the significant infrastructure costs as set out in the draft Local Plan, and note that the conclusions of the report demonstrate that a heat network would only be viable with significant public sector funding. They also question the assertions in the Local Plan regarding the feasibility of a Heat Network at York Central.</p>
<p>Comment</p>	<p>One respondent states that heat distribution networks can work in some circumstances but they are in many ways less important than thinking about energy use reduction and sources of energy / primary energy.</p> <p>Another respondent states clarification is required as to how the policy influences existing properties / residents.</p> <p>GVA on behalf of the Homes and Communities Agency (HCA) advocates that further clarity must be given as to the impact of this policy on the viability of development in the city so as not to become a redundant policy and would welcome further discussion with CYC on the potential impact on York Central.</p>

Section 12: Environmental Quality and Flood Risk

ENV1: Air Quality			
Total respondents: 9	Support: 3	Objections: 5	Comments: 2
Key Issues Raised			
Support	Policy is supported as should ensure air quality is not lowered by developments or additional traffic flows.		
Objection	<p>Fulford Parish Council state that the first part of the policy should be reworded as follows: “Development will only be permitted if the impact on air quality is acceptable and mechanisms are put in place to mitigate fully adverse impacts and prevent exposure to poor air quality. Proposals which worsen air quality in and around Air Quality Management Areas, either individually or cumulatively, will not be allowed”. This is in order to protect human health.</p> <p>Several developers object to the requirement for strategic sites to undertake detailed emissions strategy. This inserts an unnecessary layer of paperwork on a site that has already been examined and found to be suitably located.</p> <p>Suggests amendments to encourage developments that include green walls, green roofs and generally more green living elements, which have health benefits, make buildings more attractive and improves air quality.</p> <p>Low emissions zone should be considered for any non ultra low emissions vehicles entering the area just inside the outer ring road, and could fund improvements in public transport and the cycle and walking network.</p>		
Comment	<p>Yorkshire Wildlife Trust has concerns about the sharp increase in the use of biomass. The use of non-sustainable biomass can have serious impacts on woodlands and air pollution. Should consider specifying sustainable origin biomass should be used and non polluting boilers and stoves must be specified.</p> <p>York Green Party comment that reference should be made to the proposed city centre ‘Clean Air Zone’ and the intention to remove all pre Euro 6 buses and diesel operated deliveries to premises from within the inner ring road by 2020. Developers of city centre sites will be required to contribute to the operational costs of a freight transshipment service unless they can demonstrate the intention to use their own electric fleet or cycle couriers.</p> <p>Include statement specifying the date by which all AQMA zones are set to comply with the maximum pollution levels set by WHO health based objectives.</p> <p>From May 2020 all new developments accessed directly from or within an AQMA (which has not been revoked) should include a requirement</p>		

	that only electric vehicles or Euro 6 minimum will be allowed to use parking provision within the development. Car club membership, free bike and public transport passes can be provided as incentives to new occupants.
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ENV2: Managing Environmental Quality	
Total respondents: 6	Support: 2
Objections: 1	Comments: 3
Key Issues Raised	
Support	<p>Strensall with Towthorpe Neighbourhood Plan Steering Group support the policy and as previously identified the continued use of the firing ranges on Strensall Common will need mitigation to enable development of the QE Barracks site.</p> <p>CPRE - North Yorkshire supports the policy.</p>
Objection	Rapleys LLP on behalf of British Sugar PLC argue that the policy should be consistent in its tests to deliver for the level of impact that is acceptable in accordance with the NPPF and the opening paragraph of the policy itself which refers to development not giving rise to significant adverse environmental impacts. The second paragraph of the policy should therefore be reworded.
Comment	<p>YEF and Tremendous identify the lack of inclusion of Green Infrastructure and trees effect on air and noise pollution.</p> <p>York Green Party state that reference should be made to the proposed city centre 'Clean Air Zone' and the intention to remove all pre Euro 6 buses and diesel operated deliveries to premises from within the inner ring road by 2020. Developers of city centre sites will be required to contribute to the operational costs of a freight transhipment service unless they can demonstrate the intention to use their own electric fleet or cycle couriers.</p> <p>Include statement specifying the date by which all AQMA zones are set to comply with the maximum pollution levels set by WHO health based objectives.</p> <p>From May 2020 all new developments accessed directly from or within an AQMA (which has not been revoked) should include a requirement that only electric vehicles or Euro 6 minimum will be allowed to use parking provision within the development. Car club membership, free bike and public transport passes can be provided as incentives to new occupants.</p>

ENV3: Land Contamination	
Total respondents: 2	Support: 2
Objections: 1	Comments: 1
Key Issues Raised	
Support	Environment Agency supports inclusion of policy specifically for this matter.

	Strensall with Towthorpe Neighbourhood Plan Steering Group state that policy should ensure developments are not constructed before contamination investigations take place.
Objection	Environment Agency states that para.12.23 needs to be amended from 'hazardous substances' to 'potentially polluting substances'.
Comment	Environment Agency states that in para.12.23 'Hazardous substances' could be interpreted as very specific substances that are legally defined as 'hazardous'. Non-hazardous substances could also cause pollution / harm to human health.

ENV4: Flood Risk			
Total respondents: 10	Support: 3	Objections: 2	Comments: 6
Key Issues Raised			
Support	<p>Environment Agency supports this policy.</p> <p>York Green Party supports this policy. They also suggest that York should have an appropriate flood warning system, evacuation plan and escape routes when the development is in or near flood risk areas.</p> <p>Strensall and Towthorpe Neighbourhood Plan Steering Group support this policy.</p>		
Objection	<p>Rapleys LLP on behalf of British Sugar PLC argue that the policy wording should be clarified to ensure that it makes clear that only increases in flood risk arising as a direct result of the development in question will need to be mitigated for. New wording suggested.</p> <p>More adaptation required given that York is prone to flooding. Suggests focussing more on green and blue infrastructure and a relationship with flooding rather than barriers to it.</p>		
Comment	<p>Several developers request that further detail on the extent of the developer contributions is required.</p> <p>YEF and Tremendous comment that there is no mention of mitigation measures. Trees and leaky dams can slow the flow on river Ouse, Foss and strategically on Becks within York to reduce flood risk.</p> <p>Environment Agency assumes that the modelling used was the current York Detailed Model. Also acknowledge that an updated SFRA is underway and would like to work with the Council on this.</p>		

ENV5: Sustainable Drainage			
Total respondents: 9	Support: 5	Objections: 0	Comments: 6
Key Issues Raised			
Support	<p>Environment Agency supports the policy's specific reference to ensuring that SuDS prevent pollution of groundwater.</p> <p>Yorkshire Wildlife Trust strongly support the inclusion of sustainable drainage enhanced for biodiversity in developments.</p>		

	<p>Dunnington Parish Council supports the principles on sustainable drainage in this policy but they need to be implemented to reflect the nature and topography of Dunnington.</p> <p>York Green Party ask that a reference is added to the biodiversity, water quality and aesthetic benefits of green roofs, open swales and balancing ponds or lakes as part of a SuDS in appropriate developments. New habitats can help to mitigate wildlife loss at the same time as slowing runoff and preventing localised flooding.</p> <p>Arup on behalf of the York Central Partnership are supportive in principle of this policy.</p>
Objection	No objections to this policy
Comment	<p>Yorkshire Wildlife Trust ask that the phrase 'Where possible SuDS approaches should be used to enhance and support the environmental aspects of the development' could be strengthened to 'The authority will support applications where SuDS are enhanced for biodiversity'. It can also be very valuable to install SuDS in older developments and opportunities should be taken whenever they arise. Rain gardens and permeable swales and paving can reduce pressure on the Victorian sewers in York which accept sewerage and surface water runoff.</p> <p>Arup on behalf of the York Central Partnership state that it may be necessary to update the 2013 SFRA given the 2017 update on Flood Risk Maps for Planning. Clarity required - revise the wording so that it is clear the policy endorses a 30% reduction in run-off.</p> <p>Several developers ask that further detail on the extent of the developer contributions is required.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group support the policy but where connections are to be made to existing drainage systems then investigations must be carried out to ensure that there is sufficient capacity to take the additional flows even from developments with SUDs provision. Concerns that surface water drainage does not compromise any land drainage arrangements such as dykes etc.</p>

Section 13: Waste and Minerals

WM1: Sustainable Waste Management			
Total respondents: 5	Support: 2	Objections: 1	Comments: 2
Key Issues Raised			
Support	<p>Strensall with Towthorpe Parish Council support sustainable waste management.</p> <p>Rufforth with Knapton Parish Council appreciate that Waste Management and Harewood Whin are not covered in detail in the Local Plan, however they note that it is covered in the Minerals and Waste Joint Plan and are supportive of the policies contained therein with reference to Harewood Whin especially the recognition that the site is in the Green Belt.</p>		
Objection	<p>Green Party considers that (v) should include requirement for new commercial developments to include separate recycling as well as waste storage facilities and a reference should be added that new food premises should have provision for food waste collection, separate from recycling and other waste collection and requirement to store waste within the site prior to collection.</p>		
Comment	<p>Under the boxes for Policies WM1 and WM2 there is a 'See also: Policy ...' line. It would be useful if the one for WM1 was cross-referring to WM2 and vice-versa.</p> <p>Concern over how extra development will deal with additional sewage as the River Foss currently takes Earswick, Towthorpe and Strensall.</p>		

WM2: Sustainable Minerals Management			
Total respondents: 3	Support: 1	Objections: 2	Comments: 0
Key Issues Raised			
Support	<p>Strensall with Towthorpe Neighbourhood Planning Group Policy support the policy as it should ensure that any waste is re-used where possible.</p>		
Objection	<p>Rachael Maskell MP states that sites should be refused to any company planning to frack for shale gas.</p> <p>Green Party believe reference should be made to ensuring mineral exploitation takes full account of residential amenity and the unique heritage on which so much of York's economy now depends.</p>		
Comment	<p>No comments on this policy.</p>		

Section 14: Transport and Communications

T1: Sustainable Access	
Total respondents: 18	Support: 5
Key Issues Raised	Objections: 8
Comments: 7	
Support	<p>Highways England and Strensall with Towthorpe Neighbourhood Plan Steering Group support the policy.</p> <p>The York Cycle Campaign is pleased to see cyclists considered and included in the Sustainable Access plans.</p> <p>York Green Party support overall aims of the policy and welcomes the LSTF funded 'i-Travel York' programme (not referred to the policy). It also supports and welcomes the policy requirement for the provision of public transport from first occupation for a period of 10 years.</p> <p>The National Railway Museum is supportive of the approach to transport and connectivity, particularly those set out in this policy and York Central is critical to its success.</p> <p>Arup (obo the York Central Partnership) supports the policy in principle.</p>
Objection	<p>Several developers state that the policy as drafted lacks the flexibility suggested in para 14.10. It may be a bus enhancement scheme can become viable over a shorter period. Johnson Mowat (obo Taylor Wimpey) reiterates this and advocates the policy needs amending to allow a developer to submit a proposal where it can be demonstrated a service is viable without subsidy over a shorter period.</p> <p>The York Environment Forum objects to there being no mention of Green Infrastructure strategy and plans for cyclists/ walkers.</p> <p>Rachael Maskell MP advocates that car electric charging points should be built into all new developments where cars are on site, and that elderly and disabled people should not have to face barriers to travel, since this further entrenches restrictive social mobility. Another respondent reiterates Rachel Maskell's view regarding electric charging points, adding that one should be made available for each parking space a development creates and that they should have a minimum power output of 7kW.</p> <p>Rapleys LLP (obo British Sugar PLC) states the policy must be clear that the contributions in accordance with CIL Regulation 122 are directly related to the development and fair and reasonably related in scale and kind to the proposal. In particular it should be clear that contributions will be required to ensure the provision of such new services as are proven and demonstrated to be necessary to support the development in question. Rapleys LLP also suggested new wording for the policy. It advocates that such data should form part of the evidence base to demonstrate the most effective local strategies to mitigate the likely car</p>

	trips that may be generated by new developments in the city. York Green Party advocate that the suggestion that applying the policy criteria could be 'relaxed' is too weak and should be removed.
Comment	<p>York Green Party states the following: 1. that the i-travel York programme has focused mainly on the north-east sector of York and there is no indication how this might be extended more widely, 2. the current version of the plan does not appear to contain any evidence of the measurable outcomes of the programme and the most effective measures that might be more widely deployed during the plan period. 3. advocates that there should be a 'master plan' to give certainty to developers, potential businesses and future residents as to the long term infrastructure that will serve the site. 4. advocates transport initiatives such as car clubs, electric bike hubs, driverless vehicles, 'Uber'- style taxi minibus services and 'on demand' trip services should all be factored in to ensure new developments capitalise on emerging new transport options. More specifically a business case model should be considered for orbital bus services, shuttle bus services, light rail/ tram/ trolley bus/ guided bus routes etc.</p> <p>Arup (obo York Central Partnership) seeks clarity on whether the requirement to provide frequent, high quality public transport services 'from first occupation of the development for a period of 10 years, or five years after occupation whichever comes sooner' applies to sites with long build out periods - for example, the York Central site.</p> <p>Network Rail stated it would be beneficial for the policy to highlight the need for applications to be supported by appropriate transport statements or assessments and that funding to support increased connectivity necessary to support the principle of the development will be sought via developer contributions</p> <p>One respondent advocated that the 'Sustainable Transport for Development' Supplementary Planning Document should be consulted on. It should encourage reliable public transport options throughout the day and into the evening.</p> <p>Another respondent advocates that a Towthorpe – A64 flyover dual carriageway is needed.</p>

T2: Strategic Public Transport Improvements			
Total respondents: 19	Support: 4	Objections: 8	Comments: 10
Key Issues Raised			
Support	<p>Highways England welcomes the long-term proposal in the policy to strengthen traffic restraint measures in the city.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group is supportive of the policy</p>		

	<p>The National Railway Museum is supportive of the approach to transport and connectivity, particularly those set out in this policy and York Central is critical to its success.</p> <p>The York and North Yorkshire Chamber of Commerce welcomes the commitments to the strategic rail networks.</p> <p>Arup (obo the York Central Partnership) supports the policy in principle.</p>
Objection	<p>Fulford Parish Council objects to the proposal for “a dedicated public transport/cycle route linking the new settlement (ST15) to a suitable access on York’s highway network in the urban centre of York.” as there are no details of where or how this public transport / cycle route would be created Fulford Parish Council considers that it is premature for such a proposal to be included in the Plan.</p> <p>Historic England has concerns about the impact which the following might have upon elements which contribute to the special character and setting of the historic City including the expansion of the Park and Ride Sites at Askham Bar and Poppleton Bar and a segregated grade-separated bus route across the A1237.</p> <p>York Green Party advocates a comprehensive review of the existing public transport strategy. It also proposes several options for public transport service frequencies and routes, advocates that alternative modes be considered for providing public transport services, seeks the exploration (in addition to supporting the station at Haxby) for options for new stations at Strensall, Copmanthorpe, and a tram/train halt at British Sugar and advocates that traffic restraint measures and public transport priority within the city centre are far more urgent than ‘long term’ and should be introduced incrementally, starting next year.</p> <p>Whilst Network Rail supports the principle of improved facilities [adjacent to the Memorial Gardens in Leeman Road] that are beneficial to public transport it would like to ensure that proposals give priority to pedestrian and cycle movements from the station and from the York Central development.</p> <p>NTR Planning (obo McArthur Glen, Aviva Investors & York Designer Outlet) advocate that given York Designer Outlet's commitment to expand on site and expand / relocate the existing park & ride facilities, the following should be inserted in the short-term (2011-22) list: "Further expansion and relocation of the York Designer Outlet Park & Ride facilities on adjacent land south of the York Designer Outlet"</p> <p>One respondent states that the proposed new station at Haxby is in the wrong location as the only route to the station (Station Road) would not cope with the extra traffic. There is the school to consider and also the loss of allotments.</p>
Comment	<p>Although Highways England welcomes the expansion of Park & Ride in principle, the proposal to expand Askham Bar Park & Ride will increase</p>

traffic using the A1036/A64 junction and Highways England will need to understand the impact on the operation of the A1036/A64 junction.

Network Rail stated it would be beneficial for the policy to highlight the need for applications to be supported by appropriate transport statements or assessments and that funding to support increased connectivity necessary to support the principle of the development will be sought via developer contributions.

Selby District Council requests further information regarding the potential relocation of the Park & Ride facility at the York Designer Outlet Centre, as identified on the draft Proposals Map. Selby District Council supports the provision of this facility, but need confirmation of why it may be relocated within the site. If this is due to anticipated further expansion to the Designer Outlet Centre, this would be of concern, as it would be of concern as it may have implications relating to traffic congestion on the A19/A64, as well as having an impact on the health of Selby town Centre.

Network Rail would welcome being part of the consultation process for any scheme to provide waiting facilities in the area [adjacent to the Memorial Gardens in Leeman Road]

Rachell Maskell MP states that public transport routes need serious thought and development. Bus routes are too restrictive currently and therefore people opt for their car.

Strensall with Towthorpe Neighbourhood Plan Steering Group would prefer that the building of a new railway station at Haxby is brought forward to the medium term.

Several developers state that further detail on the extent of developer contributions is required.

One respondent advocates that the long-term additional transport investments should include new railway stations at Strensall (ST5), Wigginton Road (ST17, York Hospital, Bootham Crescent), and adjacent to ST1/ST2 and asks whether there is potential for a people mover between Poppleton Station and Poppleton Bar Park and Ride as an alternative to the current bus.

Another respondent queries what the Short –term 'city-wide improvements to the urban traffic system' are, queries what constitutes 'Provide highway enhancements to improve public transport reliability', adding that if these are new roads or expanding the out ring roads then they are in conflict with the Climate Change section on sustainable transport and states there is a lack of information on the proposed Haxby station and queries why there is no station for the new Elvington site.

T3: York Railway Station and Associated Operational Facilities			
Total respondents: 13	Support: 6	Objections: 1	Comments: 8
Key Issues Raised			
Support	<p>Network Rail supports the principle of the proposals to improve the railway station and appreciates the acknowledgement of the need to improve the environment to support increased capacity and connectivity.</p> <p>The Leeds City Region Local Enterprise Partnership states that the plan acknowledges that commuting to destinations outside York occurs, with significant outward commuting to Leeds in particular and welcomes that improvements to York Railway Station are included in the plan to accommodate enhancements for the planned electrification of the Trans Pennine Line, HS2 and Northern Powerhouse Rail aspirations.</p> <p>The National Railway Museum supports the provisions in the policy where it relates to York Central.</p> <p>Arup (obo the York Central Partnership) support the principles of the policy.</p> <p>The National Railway Museum is supportive of the approach to transport and connectivity, particularly those set out in this policy and York Central is critical to its success.</p> <p>The York and North Yorkshire Chamber of Commerce welcomes the commitments to the strategic rail networks.</p> <p>Arup (obo York Central Partnership) supports the policy in principle.</p> <p>York Green Party supports the development of a more formal western entrance and square linking to the new approach for rail passengers working at or living in York Central, adding that it should be designed to enhance the attractiveness of walking and cycling, accommodating taxis and buses serving the station from the west side.</p>		
Objection	<p>Network Rail states that the York Access Concept Plan shows a Harrogate Chord which is an out of date capacity scheme and conflicts with York Central Masterplan aspirations. This plan should be updated to remove the chord, the reference to HS3 is out of date and should be replaced with northern Powerhouse Rail, Paragraph 14.35 is incorrect in that the existing Siemens depot is just outside the York Central allocation therefore the bracketed reference to York Central should be removed and the operational requirements of the Transpennine Route upgrade may require a new facility within the York Central site; this will not be an expansion or relocation of the Siemens depot which will remain a separate facility.</p> <p>Historic England advocates amending criterion (i).</p>		
Comment	<p>North Yorkshire County Council states that proposals [at Site ST5] include improvements at York Railway Station, which plays an important role in providing connections to parts of North Yorkshire and beyond,</p>		

	<p>adding that ensuring that opportunities are taken to maximise benefits from enhancements and connection to HS2 is important for the potential economic growth, for York and areas beyond its boundaries.</p> <p>Network Rail advises that a new Platform 12 at York Station could be built as parallel to Platform 11. Network Rail would appreciate clarification as to which land is to be safeguarded as part of sub-clause vii.</p> <p>York Green Party states that Opportunities should be taken to reduce long stay parking at the station, priority for existing space should be given to expanding platforms, services for rail customers etc, provision would also need to be made for interchange to any new bus, shuttle bus or taxi services and tram train if developed from British Sugar site.</p> <p>Several developers state that further detail on the extent of developer contributions is required.</p> <p>One respondent states that there do not appear to be many walking access points shown on Figure 14.1 (none from west/Acomb) and the existing{Walton Road] bridge and Cinder Lane are are popular and this access should be kept open.</p>
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T4: Strategic Highway Network Capacity Improvements			
Total respondents: 13	Support: 4	Objections: 4	Comments: 8
Key Issues Raised			
Support	<p>East Riding of Yorkshire Council welcomes the identification of strategic highways network improvements at Grimston Bar in the policy and the need for joint working and is committed to working constructively with City of York Council and Highways England to ensure this is fully assessed and appropriate improvements can be identified and delivered.</p> <p>The York and North Yorkshire Chamber of Commerce welcomes the commitments to the strategic road networks.</p> <p>York Green Party welcomes the stated objective for enhanced capacity on the outer ring road, namely discouraging driving through the city centre.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group supports the inclusion of Strensall Road within the short-term section.</p>		
Objection	<p>Highways England advocate that the policy should include a reference to the provision of a new junction on the A64 to provide the main access to strategic housing site ST15 Land West Elvington Lane and states that 'Highways Agency' needs to be replaced by 'Highways England' in the 'Delivery' boxes following Paras. 14.39 and 14.43.</p> <p>York Green Party states that Para. 14.36 Is NOT borne out by policy T2</p>		

	<p>which proposed city centre traffic restraint measures as ‘long term’ ones (when they need to be short term to achieve this objective), states that there is nothing in the transport policies as currently presented to indicate action to discourage driving through the city centre and advocates that the ambition[to dual the outer ring road] should be scrapped now in favour of a regionally funded feasibility study for an appropriate light rail network to serve the largest new development sites within the plan. This is supported by Para. 4.11.9 of the Sustainability Appraisal Main Report.</p> <p>York Cycle Campaign questions the evidence upon which the substantial additions and alterations to the strategic road network are based and question the need for such extensive changes to the road infrastructure, they would be very concerned if the infrastructure investments proposed are based on the transport model (that the York Cycle Campaign consider to be flawed) and question whether they represent best value for money, they advocate that there is a danger that the proposed alterations and additions to York's strategic road network may ultimately only add to York's traffic congestion and states that many of the additions and alterations to the strategic road network directly contradict a number of the objectives in the Sustainability Appraisal; namely objectives 2, 6,7 and 12.</p> <p>One respondent supports dualling the outer ring road, and suggests a cycle lane all the way round the new dual carriageway would be good.</p>
Comment	<p>Highways England states that the policy includes several schemes that impact on the A64 Trunk Road.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group notes the policy does not mention improvements to Towthorpe Moor Lane in relation to Highways Agency improvements to A64 east of Hopgrove.</p> <p>York Cycle Campaign note that it is widely recognised by transport professionals that widening and increasing capacity only delivers short term relief, and actually increases the number of motor vehicles, a phenomenon known as induced demand, they would like to see a full reasoning and justification for the substantial additions and alterations to the to York's strategic road network, the parameters used in the transport model and appropriate economic weighting given to additions and alterations to cycle and pedestrian infrastructure, they state that it is imperative that the council presents a strong economic rationale for making substantial changes to the road network.</p> <p>Several Developers state that further detail on the extent of developer contributions is required and that the timings of junction upgrades in the policy need further explanation and are linked back to the delivery trajectories of each strategic site.</p> <p>One respondent states that the A64 / A1070 / A166 are already identified as a focal point for traffic from East Yorkshire, they advocate</p>

	<p>that the A roads need to be improved to accommodate this traffic flow and B roads, such as the B1228 or Common Lane should not be altered as both are in green corridors and contribute to the character leading to both Dunnington and Elvington, and in turn preserve the identity of the settlements and villages, they state that in the Transport Topic Paper neither the N1228 nor Common Lane were included in the tables but were referred to in the document, it is highlighted that of particular concern is the anticipated increase in traffic on Common Lane which is a narrow road and meets a difficult intersection on A1079, this is not appropriate to be used as a link road from industrial units in Elvington, Winthorpe and traffic from Selby and East Yorkshire to the A1079, They suggest that upgrading the A1237 needs to be brought forward to the medium term,</p> <p>Another respondent advocated that these upgrades are essential to the successful delivery of many sites in the northern half of the city, adding that the Haxby Road/A1237 junction needs to be grade separated.</p>
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T5: Strategic Cycle and Pedestrian Network Links and Improvements	
Total respondents: 15	Support: 3
Objections: 3	Comments: 10
Key Issues Raised	
Support	<p>York Museums Trust supports the principle of bridges over the Foss.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group supports the policy in respect of improvements of the pedestrian and cycle access along the Strensall Road corridor.</p> <p>York Green Party welcomes the short term projects in the policy, notably the improvement to Scarborough Bridge which has potential to create a major boost in walking and cycling between the west side of York and the city centre/ Minster quarter.</p>
Objection	<p>York Environment Forum and Treemendous state there is no mention of Green Infrastructure strategy and plans for cyclists/ walkers in the policy. They also advocate the inclusion of a Rufforth to Acomb cycleway and a segregated grade-separated bus and a pedestrian/cycle route across A1237.</p> <p>York Green Party advocates that corridor schemes need to be more clearly specified into Phase 1,2,3 if they are to take place incrementally as development progresses. Each phase must have some coherence in its own right for local users. They advocate that the Pedestrian/Cycle Bridge as part of the Castle Gateway regeneration must be in Short – Medium term, NOT long term to have any beneficial contribution to the development of this area. They state that the University East -West campus link was supposed to be a planning condition funded by S106 and must be included in the Short term provision. They advocate that strategic cross centre cycle routes should be implemented in the medium term as changes associated with Castle Gateway and stronger links to the city centre are implemented. The Party advocates the policy</p>

	<p>refers to the impact of flooding on walking and cycling routes and work with the Environment Agency – riverside routes need to be provided with signed alternatives (as on Fulford Road) and they advocate resilience measures need to be given priority for short term action.</p> <p>One respondent objects to how brief the policy is, and that the 'objectives' are suggested measures and have no details or plans. Need planning objectives in a document set for the future.</p> <p>One respondent advocates that the Transport Topic Paper needs to include a clear and deliverable city wide strategy to improve routes for cyclists and pedestrians in line with One Planet principles.</p> <p>One respondent advocates increasing the focus in the plan on making the bicycle the preferred approach to transport in the City, public transport - buses, trams, park and ride and the river as a route into the city and de-incentivising car use in the city by introducing congestion charging.</p>
Comment	<p>The Osbaldwick and Derwent Ward Councillor advocates that cycle provision along the A1079 should be extended to include York Road, Dunnington, to allow residents a safe cycling route to and from York.</p> <p>Kexby Parish Council state that whilst the City of York Council Strategic Cycle Route Network Evaluation & Prioritisation Methodology in the context of the pre-publication draft Local Plan is commendable, Kexby Parish Council is acutely aware that Kexby is not served by this policy, as access to the city centre does not include many outlying villages. They urge this policy covers Kexby and the A1079, including the provision of a dedicated cycle path from Kexby to the Hull Road roundabout.</p> <p>Rachael Maskell MP advocates that if York wants to see serious modal shift, it needs to seriously invest in new cycling/walking infrastructure, to enable safe and easy routes through and round the city, including to and from rural areas. New developments should place the importance of cycling and walking above car use, while enabling adequate public transport.</p> <p>York Green Party advocate that additional work needs to be done to ensure the links and signage at either side [of Scarborough Bridge] are appropriate for increased cycle traffic and movements across Bootham, they advocate cycle parking at the edge of the footstreets etc and suggest the review of the city centre inner ring road and the severance caused from surrounding suburbs as proposed by Prof Tony May on behalf of the Civic Trust should inform this section of the local plan</p> <p>York Cycle Campaign would like to see cycling infrastructure in York provided to a technical standard that is higher than the national requirements, targeting best practices such as those set out in the Sustrans Handbook for Cycle Friendly Design, CROW and other</p>

	<p>evidence based publications.</p> <p>Several developers state that further detail on the extent of developer contributions is required.</p> <p>One respondent advocates that Poppleton Road cycle routes and pedestrian routes need a rethink with more thought required on where cycle routes end, merge and cross.</p> <p>Another respondent suggests more cycle parking is needed.</p>
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T6: Development at or near Public Transport Corridors, Interchanges and Facilities			
Total respondents: 6	Support: 1	Objections: 1	Comments: 4
Key Issues Raised			
Support	<p>Historic England welcomes the requirement that development near public transport corridors should not have an adverse impact upon the historic environment.</p>		
Objection	<p>Historic England advocates including an additional criterion in the policy to ensure that any development around a public transport corridor is required to safeguard the Green Belt.</p> <p>Network Rail advocate the inclusion of a policy statement which makes it clear to developers that no new crossings will be permitted, that proposals that increase the use of level crossings will generally be resisted and where development would prejudice the safe use of a level crossing an alternative bridge crossing will be required to be provided at the developers expense.</p> <p>York Green Party advocates that these corridors and potential corridors need to be identified as such on the site allocations plans. They advocate potential extensions into and through new development sites should be identified from the outset and developers required to demonstrate how use of the facility will be maximised. The Party suggest Para 14.46 should also make reference to their value for recreational use and health benefits for residents, with new access points from development being encouraged to facilitate this.</p>		
Comment	<p>Historic England states it is imperative that making the best use of public transport corridors does not harm the elements which make York distinctive.</p> <p>Several developers state that further detail on the extent of developer contributions is required.</p> <p>York Green Party comments that potential corridors e.g. of former railway lines, need to be identified as such on the site allocations plans. Ideally potential extensions into and through new development sites should be identified from the outset and developers required to demonstrate how use of the facility will be maximised. Para 14.46</p>		

	should also make reference to their value for recreational use and health benefits for residents, with new access points from development being encouraged to facilitate this.
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T7: Minimising and Accommodating Generated Trips	
Total respondents: 8	Support: 0
Objections: 1	Comments: 8
Key Issues Raised	
Support	No representations received specifically in support of the policy.
Objection	<p>Highways England advocates changes to the policy and proposes the text for this.</p> <p>Fulford Parish Council advocates that some of the criteria in the policy need strengthening and propose the text:</p> <p>1) Criterion iii) should be reworded so that it incorporates the stricter test for new development set out in the NPPF: That any residual cumulative impacts of development are not severe and would not create safety hazards on the local and strategic highway network.</p> <p>2) Criterion iv) should be reworded as follows: Appropriate future monitoring arrangements will be put in place to show the effectiveness of mitigation measures, and if it is shown by monitoring that agreed trip generation thresholds set through a travel plan or otherwise are not being achieved, further measures will be taken.</p> <p>York Green Party advocates that Para. 14.52 should not say 'in some cases'.</p>
Comment	<p>Highways England states this policy is of key interest to it, adding there is no reference to the Strategic Road Network or Highways England in the Policy or the subsequent explanatory text, they indicate a number of the strategic development sites will have a significant individual or cumulative traffic impact on the operation of the A64 and its junctions with York's primary road network, Transport Assessments will need to address this issue.</p> <p>North Yorkshire County Council (NYCC) states that as a neighbouring Local Highway Authority, any traffic impact on NYCC's local highway network that could arise from allocations [need to] be identified and considered . Where it is clear that a development will have a material impact on its local highway network. The County Council also requests that it be included in agreeing the scoping for the Transport Assessment (TA) and Travel Plan (TP) in addition to being formally consulted during the application process.</p> <p>Network Rail advocates that Transport Assessments which consider rail infrastructure must support all applications near railways.</p> <p>York Green Party advocates that the Transport Statement or Assessment should be more proactive in demanding evidence of potential for viable public transport, walking and cycling provision regardless of the anticipated car trips and the capacity of local roads.</p>

	Several developers state that further detail on the extent of developer contributions is required.
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T8: Demand Management	
Total respondents: 10	Support: 2
Objections: 1	Comments: 7
Key Issues Raised	
Support	Highways England and York Green Party support the policy.
Objection	The National Railway Museum, Arup (obo the York Central Partnership) and GVA (obo the Homes and Communities Agency) advocate more flexibility in the wording of the policy to allow proportionate provision on major sites such as York Central where visitors may wish than more than 4 hours parking.
Comment	<p>York Green Party advocates that there should be a presumption that new developments within the inner ring road will be 'car-free' (except for disability needs). More specifically, there should be no new parking provision unless it is replacing existing parking in a more appropriate location away from the footstreets.</p> <p>The York and North Yorkshire Chamber of Commerce advocates: the implementation of demand management must be carefully considered in the York city context; for the foreseeable future, access by car to the City Centre will remain a necessity and parking provision should continue to be provided, and the business community should be consulted on proposals to restrict car access beyond the current pedestrianised areas of the city.</p> <p>The York Museums Trust states that not allowing long stay car parking for overnight visitors will damage the visitor economy and advocates some form of dispensation for overnight guests.</p> <p>Several developers state that further detail on the extent of developer contributions is required.</p>

T9: Alternative Fuel Fuelling Stations and Freight Consolidation Centres	
Total respondents: 6	Support: 1
Objections: 1	Comments: 3
Key Issues Raised	
Support	<p>The York Green Party supports the policy.</p> <p>Rachael Maskell MP advocates that a logistics interchange should be developed, to break down goods, and reduce the flow of goods traffic in York.</p>
Objection	The York and North Yorkshire Chamber of Commerce suggests that the policy should refer to, and make provision for, other Alternative Fuel Fuelling Stations such as hydrogen stations and electric recharging stations.
Comment	York Green Party has concerns that a suitable location [for either an alternative fuel fuelling station or a freight consolidation centre] is not

	<p>identified in the current version of the plan.</p> <p>Several developers state that further detail on the extent of developer contributions is required.</p>
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C1: Communications Infrastructure	
Total respondents: 9	Support: 2
Key Issues Raised	
Support	<p>Historic England supports that proposals for communications infrastructure will only be supported where there will be no adverse impacts upon the landscape character, setting, views, heritage assets or Green Belt objectives.</p> <p>York Green Party support the approach to the policy however would like to see some control included on the ancillary infrastructure, with a presumption against advertising material on junction boxes when located in conservation areas and the Green Belt.</p>
Objection	<p>York and North Yorkshire Chamber of Commerce state that the policy should require refurbishment and new development schemes to be future proofed to facilitate the provision of mobile, broadband and wireless communications infrastructure.</p> <p>The policy fails to include fast broadband internet for all York households. In rural areas internet speeds are slow and leaves people disadvantaged. This should be updated to reflect the required action to enable support for residents and businesses in rural areas.</p>
Comment	<p>North Yorkshire County Council suggests that proposed developments (housing, retail, factory, business parks) should plan for the installation of equipment to enable the latest technology to be deployed, and not leave it to be installed by third parties once the development is complete. When development is planned, discussion with mobile operators should be undertaken as part of the initial planning stages. York's aspirations as a Gigacity and use of communications technology can have a significant impact on the way people choose to live within the city.</p> <p>Strensall with Towthorpe Neighbourhood Plan states that the steering Group Policy is supported but any sizable development must include plans to ensure there is sufficient communications infrastructure to meet the demands of modern living.</p> <p>Several developers state that further detail on the extent of the developer contributions is required.</p>

Section 15: Delivery and Monitoring

DM1: Infrastructure and Developer Contributions	
Total respondents: 9	Support: 1
Objections: 3	Comments: 6
Key Issues Raised	
Support	CPRE North Yorkshire support the policy, as it is vital that infrastructure is delivered prior to new development proposals for sites to be developed sustainably
Objection	<p>Highways England states that the policy needs to include an additional reference to the need for developers to contribute to mitigation schemes on the A64.</p> <p>Network Rail states that developer contributions policy and supplementary guidance must ensure infrastructure risks are identified and mitigation secured.</p> <p>Rapleys LLP advocates the Council must ensure, in accordance with the NPPF, that the requirement for funding strategic infrastructure does not hamper the viability and deliverability of the key strategic sites, and that the policy should include specific reference to contributions being in accordance with the requirements of CIL Regulation 122.</p> <p>CPRE North Yorkshire advocate that an additional paragraph should be included within this policy setting out that any developer wishing to opt out of this payment should be required to provide an open book audit as set out in Policy H10 dealing with affordable housing provision.</p> <p>Johnson Mowatt advocates amending the policy to include test from NPPF para. 173 regarding reasonable returns to landowner and developer.</p>
Comment	<p>Network Rail states that it would not seek contributions towards major enhancement projects which are already programmed as part of its remit.</p> <p>Johnson Mowatt notes that the Plan identifies approximately 30 policies where 'developer contributions' are referenced in the supporting 'delivery text'. Adding that it must be acknowledged they are all potentially making demands of development on matter that in the main would be covered by CIL.</p> <p>Johnson Mowatt also advocates that the viability work currently being undertaken by CYC needs to be vigorously tested working with the development industry.</p> <p>Johnson Mowatt refers to NPPF Paragraph 173 that concerns sites and scale of development not being subjected to a level of policy burdens</p>

[REDACTED] and obligations such that viability is threatened.

Alternative Site Submissions

Summary of new and previously rejected sites submitted through Local Plan Pre-Publication draft Reg 18 consultation

Site Ref	Former Allocation Ref	Site Name
6	H37	Land at Greystone Court Haxby
23	N/A	The Paddock Acomb Grange
33	H2a	Racecourse stables off Tadcaster Road
49	H27	The Brecks, Strensall
55	H26	Land at Dauby Lane, Elvington
130	N/A	Land at Acomb Landing, Landing Lane, York.
131	ST13	Land at Moor Lane, Copmanthorpe
132	H2b	Land at Cherry Lane
155	ST11	New Lane, Huntington
170	N/A	Pond Field Heslington
179	H54	Whiteland field, Haxby
180	H50	Land at Malton Road
187	ST30	Land to the North of Stockton Lane
221	N/A	Agricultural Land(North West) of Sim Balk Lane
222	N/A	Agricultural Land (South West) Sim Balk lane
223	N/A	Agricultural Land Copmanthorpe Lane
224	N/A	Agricultural Land Church lane, Bishopthorpe
565	SF1	Land at the Mews Strensall (North of Flaxton Road
580	H36	Blairgowerie House, Poppleton
687	N/A	Land East of Northminster Business Park
737	N/A	Stock Hill Field, West of Church Balk, Dunnington.
752	SF11	Land at East Field Wheldrake
768	SF5	Land to the West of Moor Lane, Copmanthorpe
780	N/A	Site South of Knapton Openspace (New House Farm)
789	N/A	Land to the West of Beckside Elvington
792	N/A	Land South of Foxwood Lane, Acomb - Duplicate
795	N/A	Greenacres Murton Lane
800	ST25	Land south of Designer Outlet.
801	N/A	Clifton Gate Business Park
814	SF4	Land north of Haxby
825	SF1	Former Safeguarded Land South of Strensall
827	H33	Water Tower Land Dunnington
847	ST6	North of Grimston Bar
859	SF15	Land To the North of Escrick
864	N/A	Extention to Elvington Industrial Estate
871	N/A	Land at North Field York
872	ST12	Manor Heath, Copmanthorpe
873	N/A	Land to the East of the Designer Outlet

Site Ref	Former Allocation Ref	Site Name
874	SF10	Land North of Riverside Gardens Elvington
880	ST10/SF12	Land at Moor Lane Woodthorpe
882	N/A	Land to the East and West of Askham Lane
884	N/A	Land southwest of the A1237 and A59 Junction
885	N/A	Land East of Northfield Lane Minster Equine Veterinary Clinic
887	N/A	Land lying between Northfield Lane, A59 and A1237
890	N/A	Luigi's Restaurant, Northfield Lane,
896	H35	Land at Intake Lane Dunnington
897	N/A	Land at Landing Lane Haxby
903	H34	Church Lane, Skelton
907	N/A	Land North of Northminster
926	H28	Land North of North Lane, Wheldrake
940	N/A	Remaining Land at Bull Commercial Centre
941	N/A	Land West of Elm Tree Farm Elvington
942	N/A	Land at Chapel fields York Duplicate
956	N/A	Milestone Avenue Ruffoth
957	N/A	Malton Road Business Park
958	N/A	Black Dyke Upper Poppleton
959	N/A	Land at Kettlestring Way
960	N/A	Land North of Harewood Close Wigginton
961	N/A	Low Well Farm Wheldrake
962	N/A	Brook Nook and Holly Tree Farm
963	N/A	Brook Nook
964	N/A	Galtres Garden Village
965	N/A	South of Southfields Close Rufforth
965	N/A	Land South of Rufforth Airfield
966	SF14	Land to the East of Strensall Road Earswick
968	N/A	North of Avon Drive (reduced boundary)
969	N/A	Land east of Northfield Lane and South of Wyevale Garden centre
970	N/A	Land at Princess Road North Strensall
971	H30	Southfields, Strensall
972	N/A	North Carlton Farm, Stockton-on-the-forest
973	N/A	Land off Mitchells Lane
982	N/A	Racecourse Greenhouses

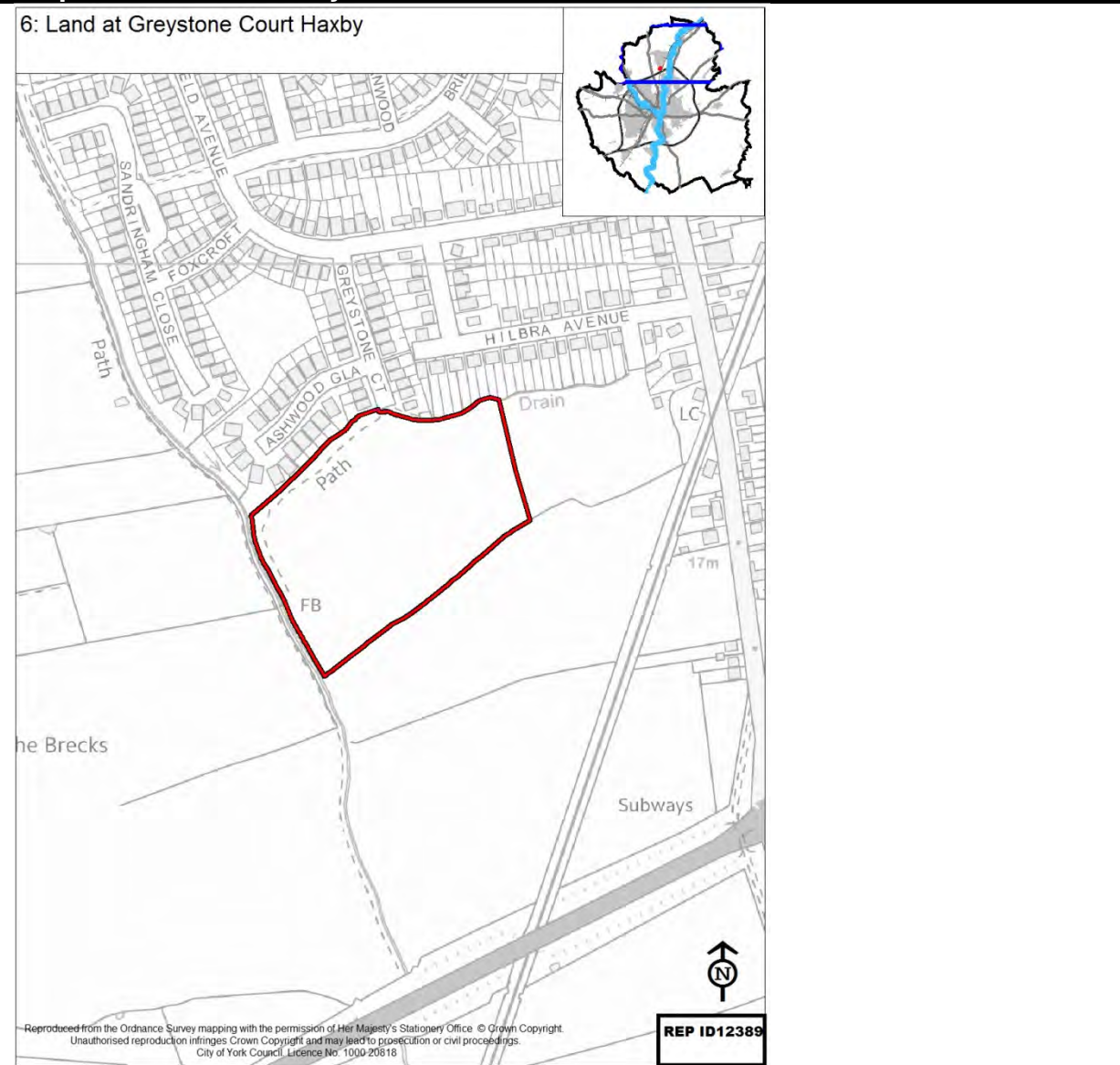
Alternative Sites

Summary of new and previously rejected sites submitted through Pre-Publication draft (Reg 18) Consultation (2017)

Site 6 (former H37) Land at Greystone Court, Haxby
Summary of site submission

This representation supports site H37 proposed allocation setting out that there is a willing landowner, no technical constraints to delivery and that the site could be delivered within 12-18 months of plan adoption to contribute to the 5 year supply. Supporting documents already undertaken and previously submitted include drainage, highways, ecology and contamination. Pre application advice has already been received supporting residential development for 1.95ha and 47 dwellings with new public openspace (2014). Reference is also made to officers support the reinstatement of the site (for 1.95 ha, 47 dwellings) as part of the Executive 2017 Annex 3 having accepted the evidence submitted. The applicant considers that the development could provide a stronger, more permanent greenbelt boundary to the south of Haxby through provision of new public openspace within the greenbelt. Disagree with previous responses by Historic England in relation to the site. Documents attached include the pre-app advice received, summary of the evidence base prepared for the site and masterplan.

Proposed site boundary



Site 23 (no former allocation) The Paddock Acomb Grange

Summary of site submission

Land adj Grange Lane - currently not in use, but has been previously used for sheep grazing. Access is already laid down (former Wetherby Turnpike and 18th century road, Broad Lane. Potential for residential development - 3 or 4 single storey retirement bungalows.

Proposed site boundary

23: The Paddock Acomb Grange



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Site 33 (former H2a) Racecourse stables off Tadcaster Road

Summary of site submission

York Racecourse object to the removal of former allocation H2a: Racecourse Stables, Tadcaster Road. Previously put forward and allocated. Confirmation is given that this site could be available in the long-term by York Racecourse following relocation of stables to main Racecourse site. According to policy H2 the density would be 'urban area' and would support up to 50 dwellings per acre. Considered to be a sustainable location for future development.

Proposed site boundary



Site 49 (former H27) The Brecks, Strensall

Summary of site submission

Linden homes object to the removal of this site as an allocation, as the site has historically been seen as outside the green belt, the Council's evidence base has previously supported the allocation of the site, the site makes very limited or no contribution towards green belt purposes and the delivery of the site would assist in the delivery of sustainable development in the city. The site should be removed from the green belt and allocated for housing (approx 102 dwellings). There are no insurmountable constraints to the site or its development and it is deliverable within the next 5 years. Also supplied is Lichfield's Technical Report on Housing Issues including Market Signals Assessment and a draft site layout.

Proposed site boundary

49: Land at Brecks Lane, Strensall



Site 55 (former H26) Land at Dauby Lane, Elvington

Summary of site submission

Former allocation H26: Land at Dauby Lane, Elvington. This is a 5.1 ha sites that comprises of large open field and two linked linear woodland blocks, which are remnants of a former military camp from WWII. Strongly object to the omission of the site as a housing allocation in the Plan. The site is suitable, deliverable and viable and has a willing developer. There are not considered to be any technical constraints to preclude delivery. Evidence base undertaken to support the site remains valid including a topographical and archaeological surveys, geo-environmental appraisals, flood risk and drainage, air quality impact assessment, transport assessment and ecological assessments. Previously, the respondent considers that the Parish Council objected to the site's removal. Consider that this should replace allocation H39 as it is closer to the village and has direct access to Elvington lane. Rationale to discount H26 in comparison to H39 finely balanced in officer's report. It is considered that the site is well-contained and it relates well to the village and does not meet the purposes of Green Belt. This is mixed brownfield/greenfield. Evidence base attached includes site plan, site allocation density information and a technical report on housing issues by consultants Lichfields.

H26 Dauby Lane was generally supported by residents as a means of linking the two residential areas of Elvington. Consider that 60 houses would be suitable on this site (more than H39). CYC has ignored residents' views by removing H26 and keeping H39.

Proposed site boundary



**Site 130 (no former allocation) Land at Acomb Landing, Landing Lane, York.
Summary of site submission**

Land at Acomb Landing, Landing Lane, York. The site is a redundant Yorkshire Water facility located off Landing Lane to the north of Water Lane, in the Acomb area of the City, approx 2km north west of the City Centre. The site is bound to the north by existing Yorkshire Water infrastructure, to the east by the River Ouse, the south by an RSPCA facility and parkland to the south of Water End, and to the west by a railway and suburban development. It is within existing development limits for the City. Good vehicular access into the site is provided via Landing Lane, bus stops are located at the junction of Landing Lane and Water End. A number of key local services and a primary school are within 400m of the site, to the west. The site's proximity to the River Ouse means that part of the site falls within Flood Zone 2, and at the eastern boundary, Flood Zone 3. However, the majority of the site is Flood Zone 1. The developers are currently preparing a draft residential proposal where residential uses are located outside the higher flood risk areas. It is likely to comprise an apartment development with buildings located within the western part of the site. The larger building to the east of the access road may be retained and re-used, with land in front of, and to the east of this building used for open space.

Proposed site boundary



Site 131 ST13 Land at Moor Lane, Copmanthorpe
Summary of site submission

Former allocation ST13: Land at Moor Lane, Copmanthorpe. Object to the site not being allocated in the Local Plan. Site is 5.61 ha. Previously allocated for 5.5 ha and 115 dwellings (2013) and 5.61 ha and 125 dwellings (2014) to be delivered in the short-term. Previous studies submitted for the site are still relevant (not attached) but include archaeological evaluation and assessment, transport survey, flood risk and drainage, geo-environmental, heritage, sustainability and ecological appraisal. There are no constraints that would preclude development. The evidence has fed into various master plans previously accepted by CYC. Disagree with officer assessment presented in July 2017. Do not agree that the site would impact the character of the village as it will still remain compact. Disagree that undue pressure will be put on existing facilities as development would support these. Access and cumulative transport issues are demonstrated through evidence to be mitigated satisfactorily. ST13 would cause less harm than ST14 or ST15 on the Green Belt. It is agreed that the council are not implying that this land meet green belt purposes; This site is bounded on all sites and separated to the agricultural land by a strong belt of trees. ST13 could be brought forward in the short-term without substantial lead-in time as other strategic sites. Evidence appended included site plan and transport assessment.

Proposed site boundary



Site 132 (former H2b) Land at Cherry Lane

Summary of site submission

Shepherd homes seek the allocation of Site 132 for residential development. Part of the site was proposed for residential development in the 2013 Preferred Options Local Plan as part of a larger allocation of land that included the York Racecourse stables to the south. Representations were made to the previous stages of the local plan as well as the Preferred Sites Consultation (PSC) in September 2016 where removal of that allocation was proposed (included as appendices).

A Landscape Design Statement submitted since the representation to the PSC demonstrates that development would not cause harm to the setting of the Knavesmire. The site was considered in the Strategic Housing Land Availability Assessment 2011 (site number 91). The SHLAA recommended the site is considered to be suitable for housing. A pre-application enquiry has been submitted for a scheme of 5 houses. A Hornbeam tree, protected by a tree preservation order, is located next to the proposed access and a small section of the root protection area of the tree will be affected. To minimise disruption to the tree root, this section of the access will be constructed utilising a cellular 'no dig' construction system.

Proposed site boundary

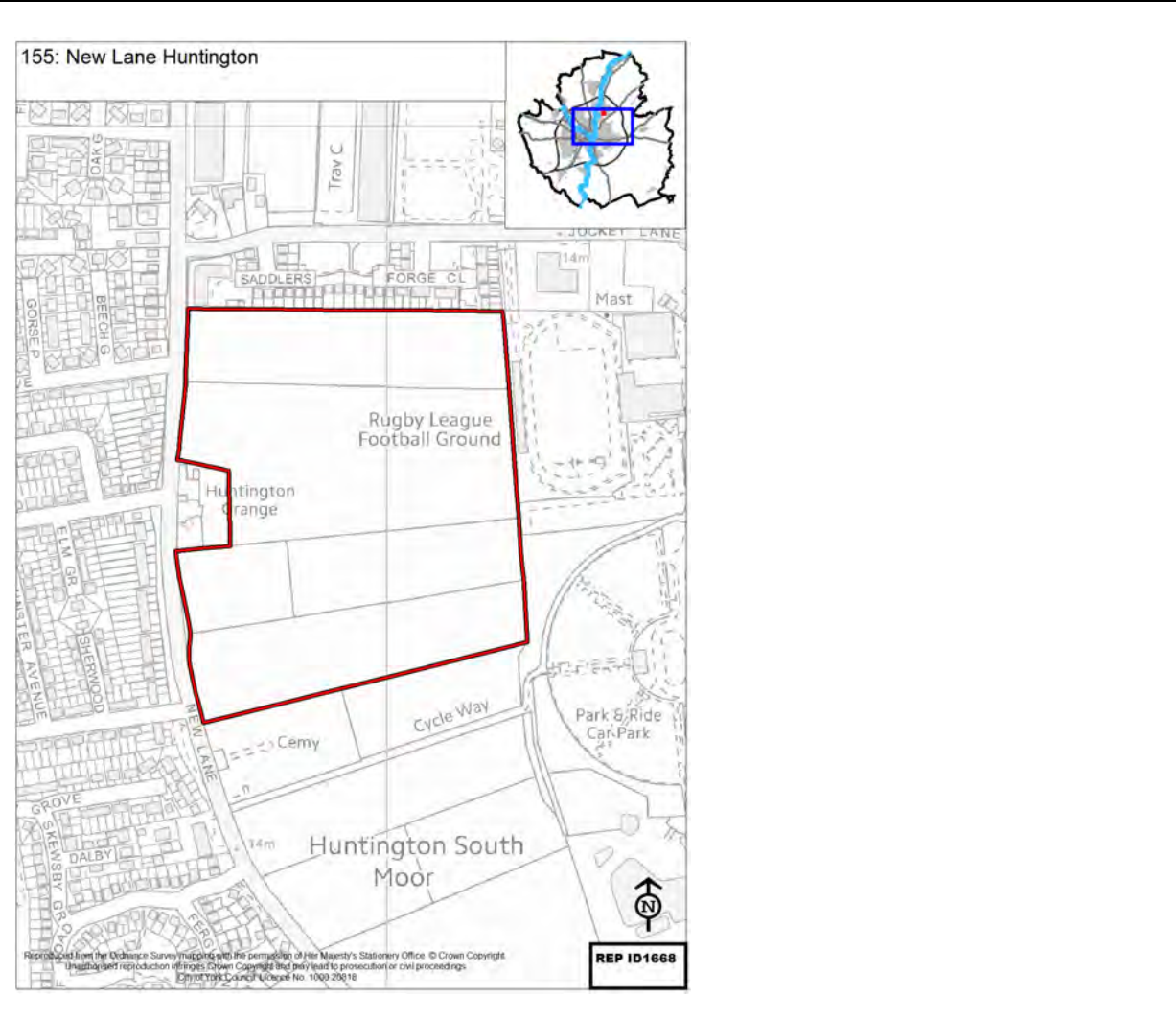


Site 155 (former ST11) New Lane, Huntington
Summary of site submission

Previous allocation ST11: New Lane Huntington. Barratt and David Wilson homes strongly object to the omission of this site as a housing allocation. The site is suitable, available, deliverable, and achievable. The site has potential to deliver 250 homes within the first 5 years of the plan with development starting on site in 2019/20 following a planning application and infrastructure work at a rate of 60 homes per annum minimum. Density of development would be at 32 dph. The revised site masterplan is attached (re-submitted from 2014) and is considered to address previous officer concerns in relation to the setting of the SAM, layout and landscaping. It is considered that this site has strong defensible boundaries in terms of Green Belt and does not meet Green Belt purposes. There are no technical or environmental (built and natural) constraints that would preclude the development of the site. In addition, the site would offer new accessible openspace and linkages to Monks Cross in a currently inaccessible location.

Alternative boundary (site 320) also supported by Persimmon Homes.

Proposed site boundary



**Site 170 (no former allocation) Pond Field Heslington
Summary of site submission**

Persimmon homes object to the removal of this site as a potential allocation. Site size: 1.3ha. Developer preferred use is Residential for 49 dwellings. Suggested delivery and phasing of development is Short-Term. Green Belt Assessment submitted as well as Summary of technical evidence stating that the proposed Green Belt boundary which steps noticeably south to include Whiteland Field is illogical and that there are existing robust and defensible boundaries to the site. Whiteland Field is not part of sensitive countryside and the general area does not support the setting or special character of York or the older elements to Haxby. It has been accepted that identifying sites for over 7,000 houses on former Green Belt land can take place without discouraging urban regeneration.

Proposed site boundary

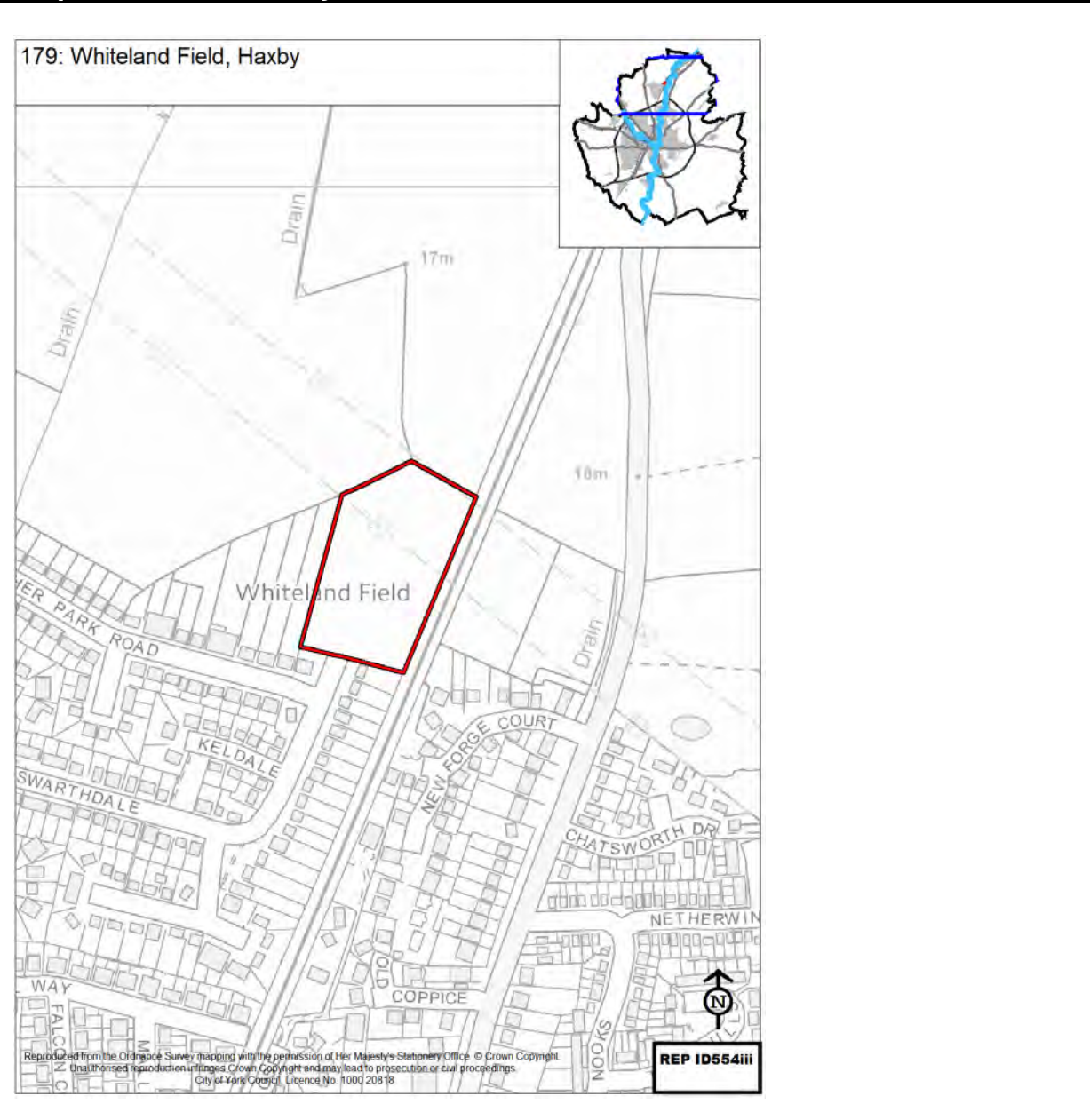


Site 179 (formerly H54) Whiteland field, Haxby

Summary of site submission

Persimmon homes object to the removal of this site as a potential allocation. Site size: 1.3ha. Developer preferred use is Residential for 49 dwellings. Suggested delivery and phasing of development is Short-Term. Green Belt Assessment submitted as well as Summary of technical evidence stating that the proposed Green Belt boundary which steps noticeably south to include Whiteland Field is illogical and that there are existing robust and defensible boundaries to the site. Whiteland Field is not part of sensitive countryside and the general area does not support the setting or special character of York or the older elements to Haxby. It has been accepted that identifying sites for over 7,000 houses on former Green Belt land can take place without discouraging urban regeneration.

Proposed site boundary



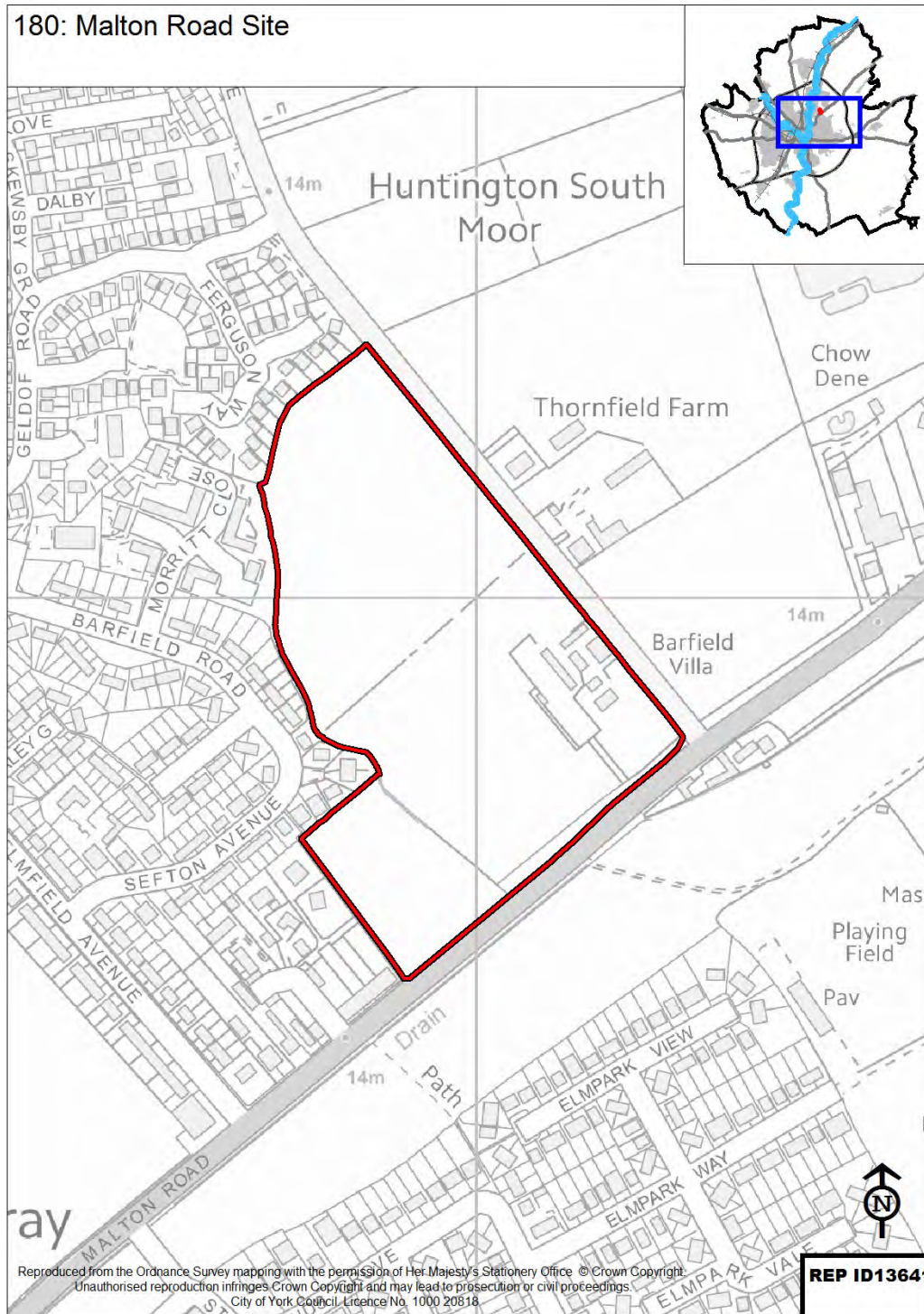
Site 180 (formerly H50) Land at Malton Road

Summary of site submission

Landowner objects to the removal of this site as a potential allocation. The site is off Malton Road and New Lane, Huntingdon. Site has been previously considered as a housing site but was discounted due to perceived flood issues. Attached site plan to confirm it is suitable for development and flooding issue is resolvable. Would be extension to settlement and alternative to ST8 which is not an extension.

Proposed site boundary

180: Malton Road Site

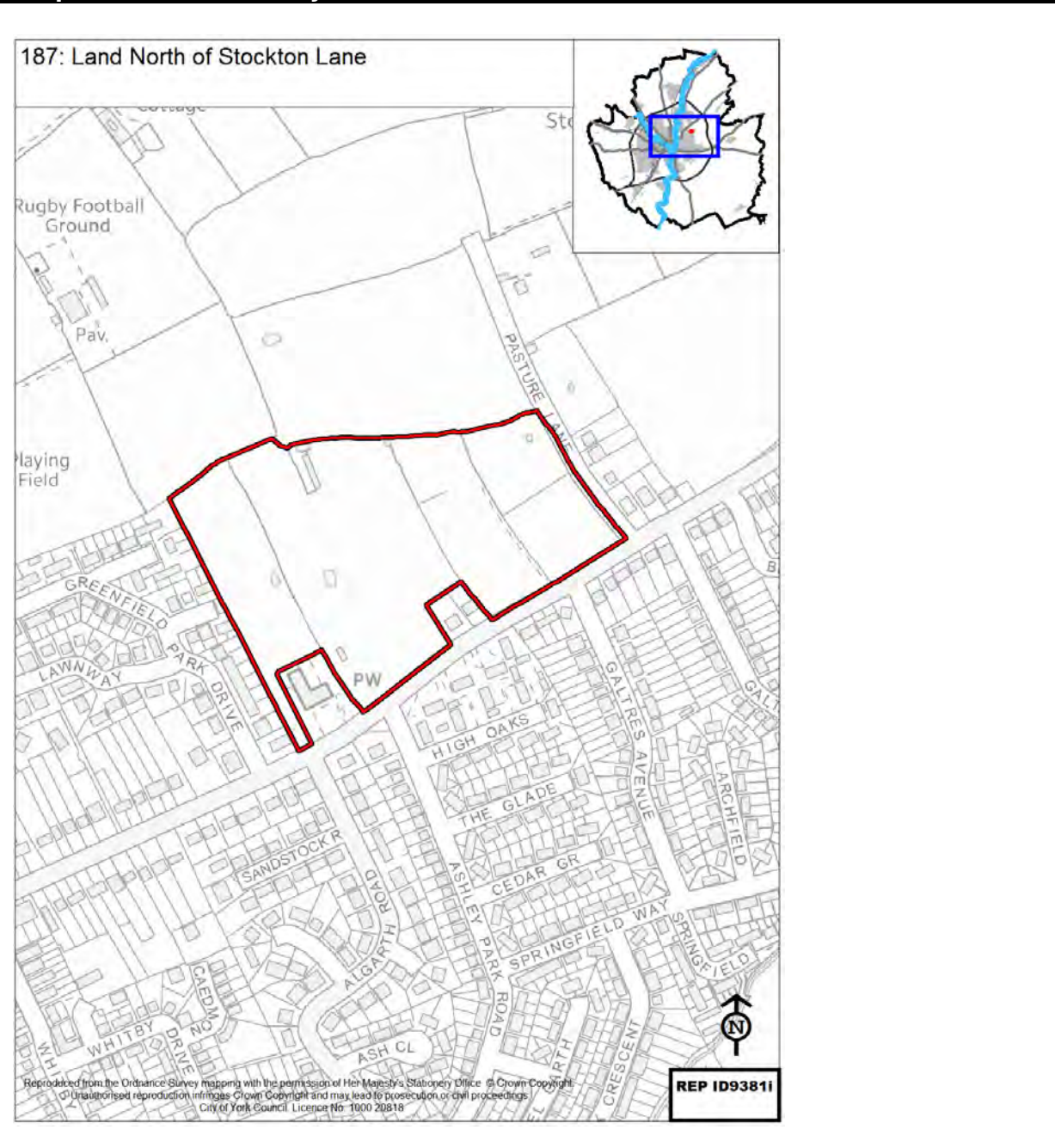


Site 187 (formerly ST30) Land to the North of Stockton Lane

Summary of site submission

Former allocation ST30: Land North of Stockton Lane. Object to the exclusion of this site as a site allocation. Response to the PSC (2016) demonstrated that officers concerns with the site were unfounded using evidence. Disagree that this site performs Green Belt function and evidence produced for the site supports this. The site is available, deliverable and achievable. It is considered that this is one of the most sustainable sites and should be reinstated as an allocation or safeguarded land. Evidence base previously submitted to support the allocation remains relevant and includes Planning statement, transport statement, landscape appraisal and delivery statement.

Proposed site boundary



**Site 221 (no former allocation) Agricultural Land(North East) of Sim Balk Lane
Summary of site submission**

Site submission for land on the north-eastern side of the Sim Balk Lane to the north of the A64, York. Site is available for development. Currently agricultural land, it is considered that the site does not have any flood risk (zone 1), ecological or transport constraints to development.

Submitted for residential or educational use.

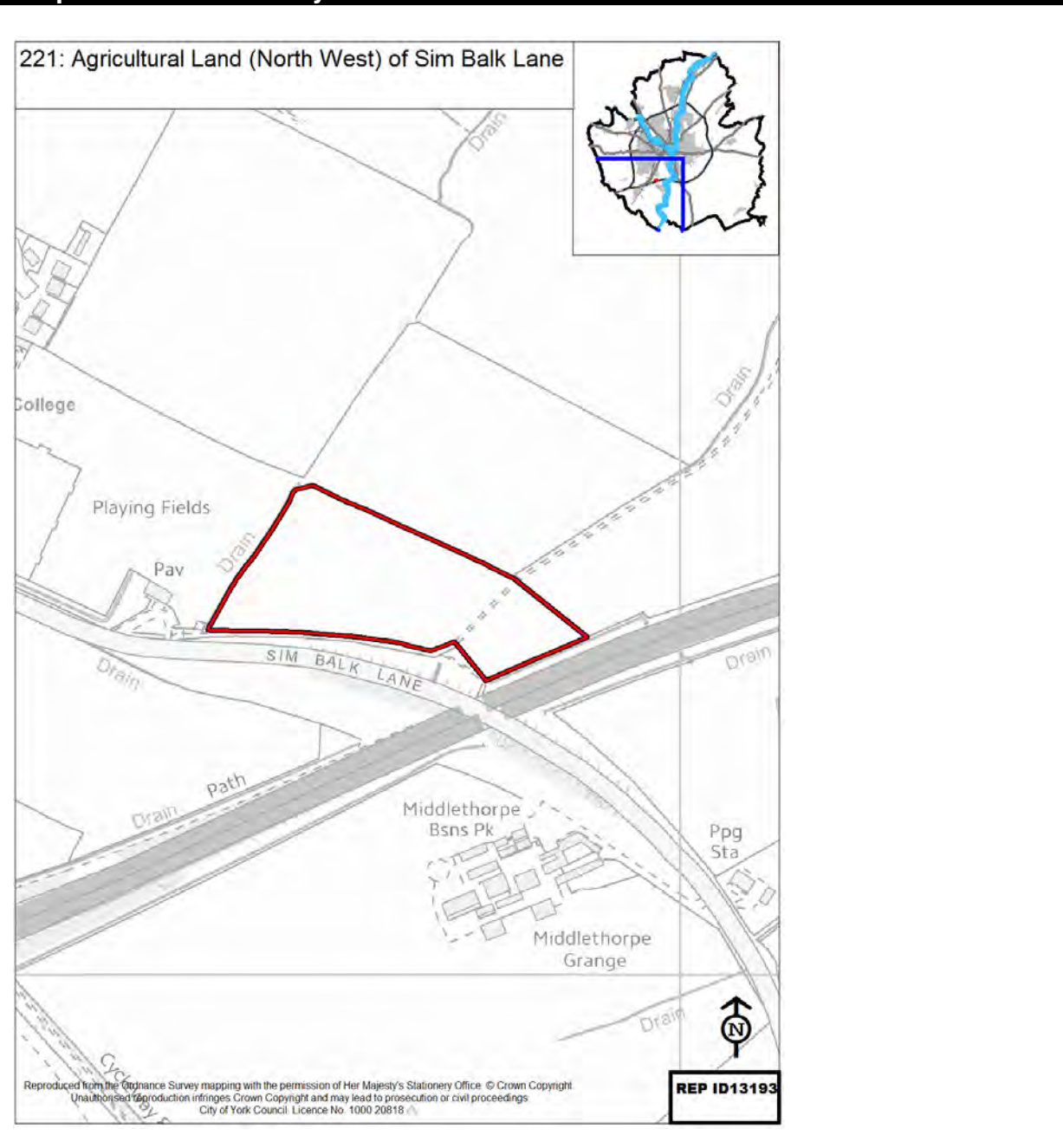
If residential consider size 1.75ha at 35 dph to yield 61 residential units.

Proximity to college indicates suitable for education use.

Site is considered to have existing urbanising influences adjacent; bounded by York College, Park and Ride and A64.

Consider that would not harm historic visual character of the city. Site Access Appraisal submitted to show accessibility.

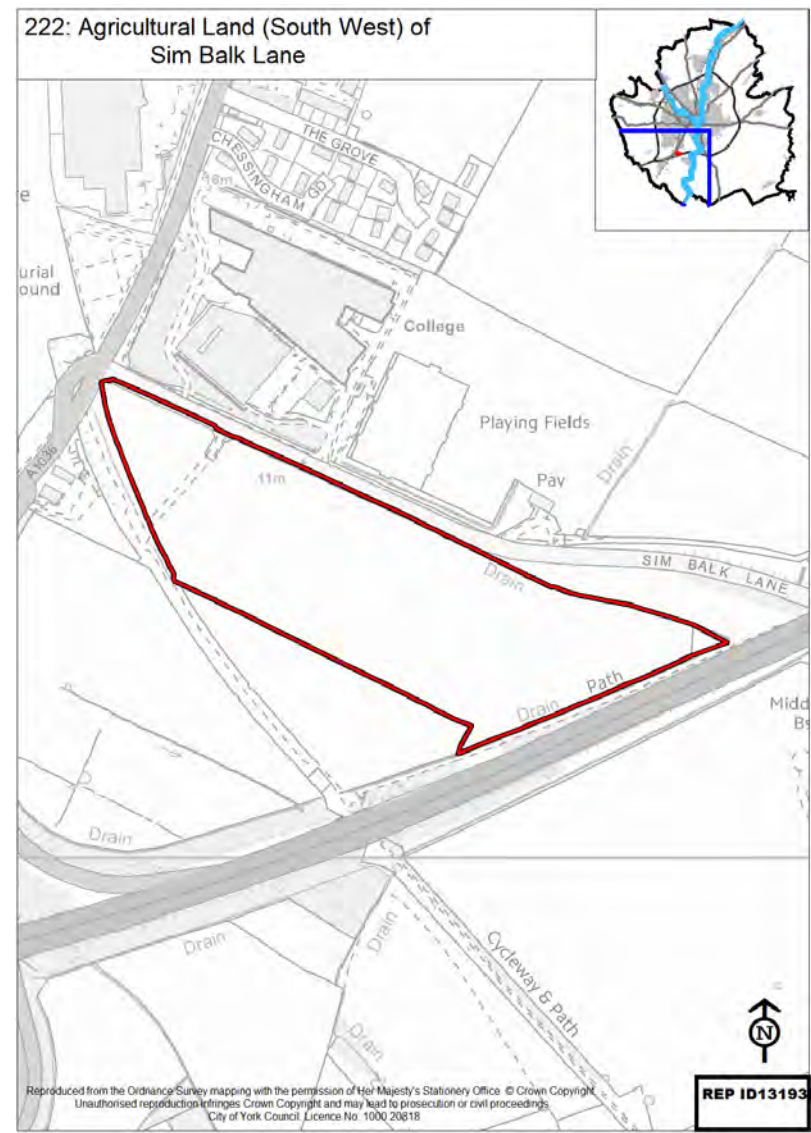
Proposed site boundary



**Site 222 (no former allocation) Agricultural Land (South West) Sim Balk lane
Summary of site submission**

Site submission for land on the south-western side of Sim Balk lane to the north of the A64, York. Site is available for development. Currently agricultural land, it is considered that the site does not have any flood risk (zone 1), ecological or transport constraints to development. Submitted for residential, mixed use of residential/ hotel/ care home/ educational use or B1a (10,000sqm). If residential consider size 5.32ha at 35 dph to yield 186 residential units. Considered to be need for additional hotel accommodation and location is suitable for this use given proximity to park and ride, college and racecourse. Proximity to college indicates suitable for education use. Site is considered to have existing urbanising influences adjacent; bounded by York College, Park and Ride and A64. Considered to make limited contribution to the openness of the GB. Consider that would not harm historic visual character of the city. Site Access Appraisal submitted to show accessibility.

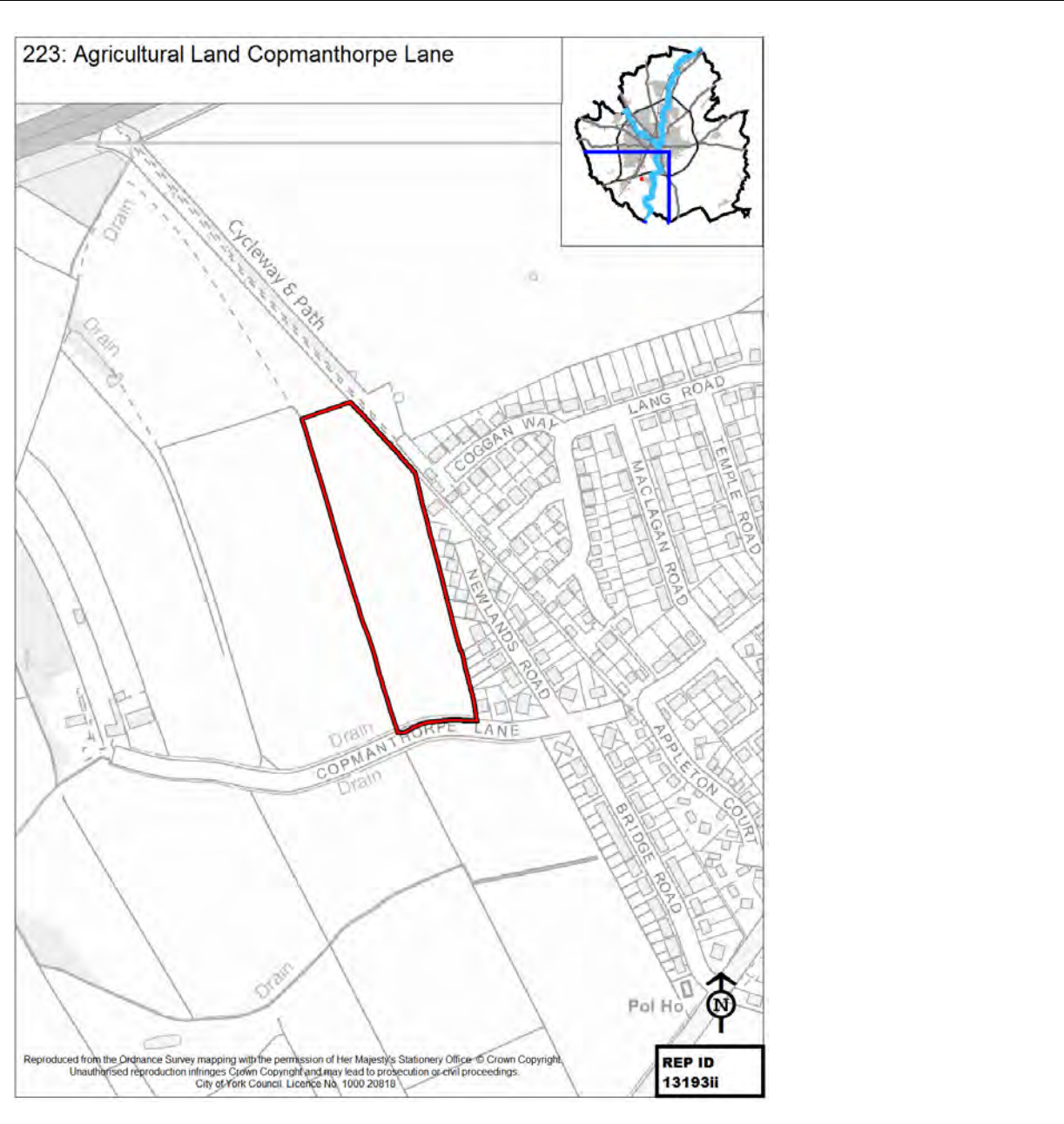
Proposed site boundary



Site 223 (no former allocation) Agricultural Land Copmanthorpe Lane
Summary of site submission

Site submission for land to the west of Bishopthorpe, north of Copmanthorpe Lane, York. Site is available for development. Currently agricultural land (not grade 1), it is considered that the site does not have any flood risk (zone 1), ecological or transport constraints to development. Submitted for residential use. Consider size 1.76ha at 35 dph to yield 62 residential units. Site is considered capable of integrating into existing village against whose background it would be seen. Consider that would not harm historic visual character of the city. Site Access Appraisal submitted to show accessibility.

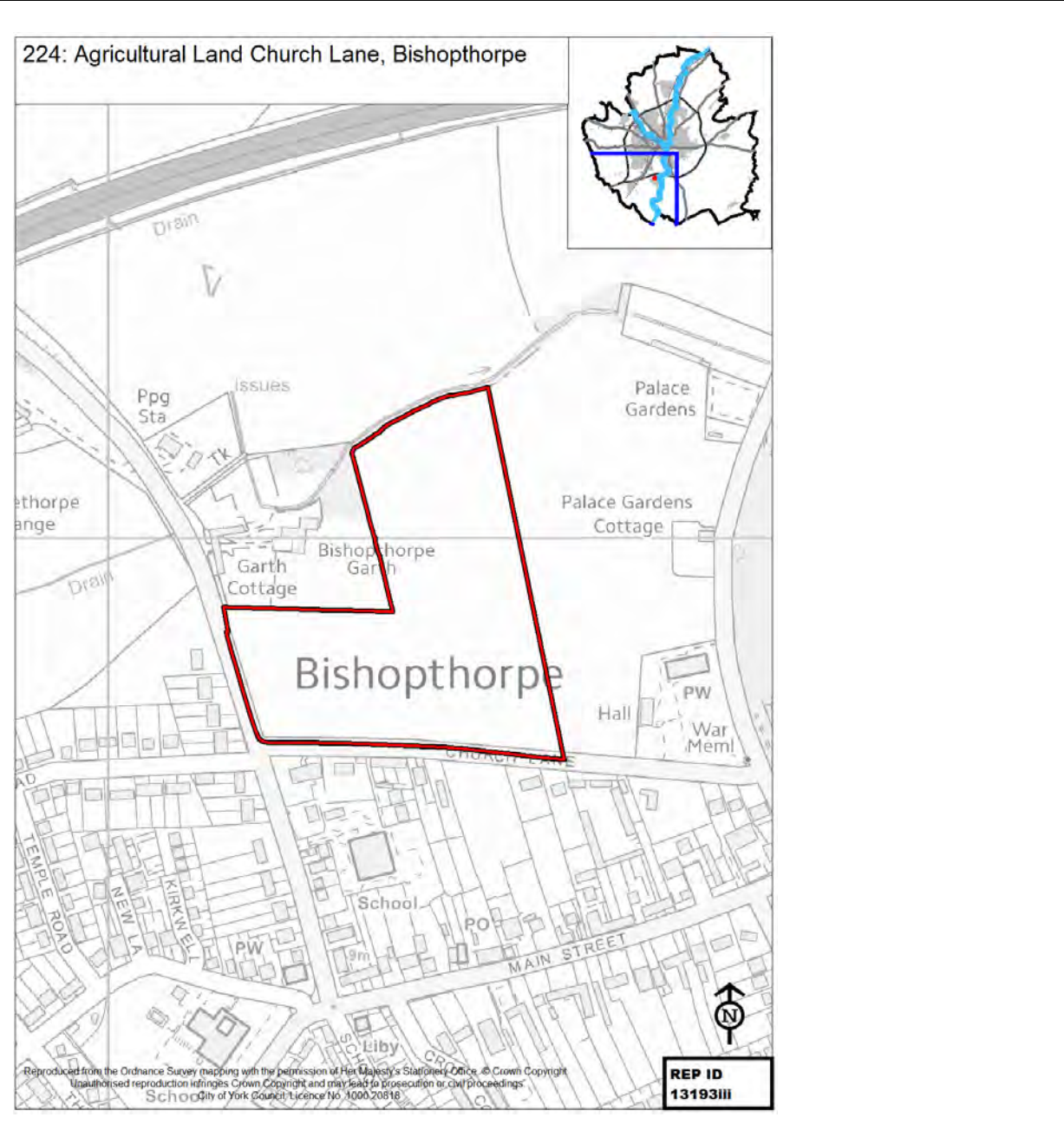
Proposed site boundary



**Site 224 (no former allocation) Agricultural Land Church lane, Bishopthorpe
Summary of site submission**

Site submission for land to the north of Bishopthorpe, north of Church Lane, York. Site is available for development. Currently agricultural land (not grade 1), it is considered that the site does not have any ecological or transport constraints to development. Majority of site is flood zone 1 but stream bordering northern boundary means a small part in zone 2 and 3; considered that design could avoid adverse impacts. Site is with a conservation area. Submitted for residential use. Consider size 3.71ha at 35 dph to yield 130 residential units. Site is considered capable of integrating into existing village against whose background it would be seen. Consider that would not harm historic visual character of the city. Site Access Appraisal submitted to show accessibility.

Proposed site boundary



Site 565 (formerly SF1) Land at the Mews Strensall (North of Flaxton Road) Summary of site submission

PB Planning obo Landowner - Land North of Flaxton Road, Strensall should be considered as housing allocation for approx 30 dwellings. Site previously included as part of SF1 as safeguarded land. Residential development would not have an impact of the landscape or heritage value of the area. The site is suitable, deliverable, available and achievable and there are no technical constraints preventing the site from being developed. Site is within 800m of Strensall village centre and does not fulfil any of the five green belt purposes and the development would not harm the adjacent SINC. Could commence delivery in 2019. Site plan included.

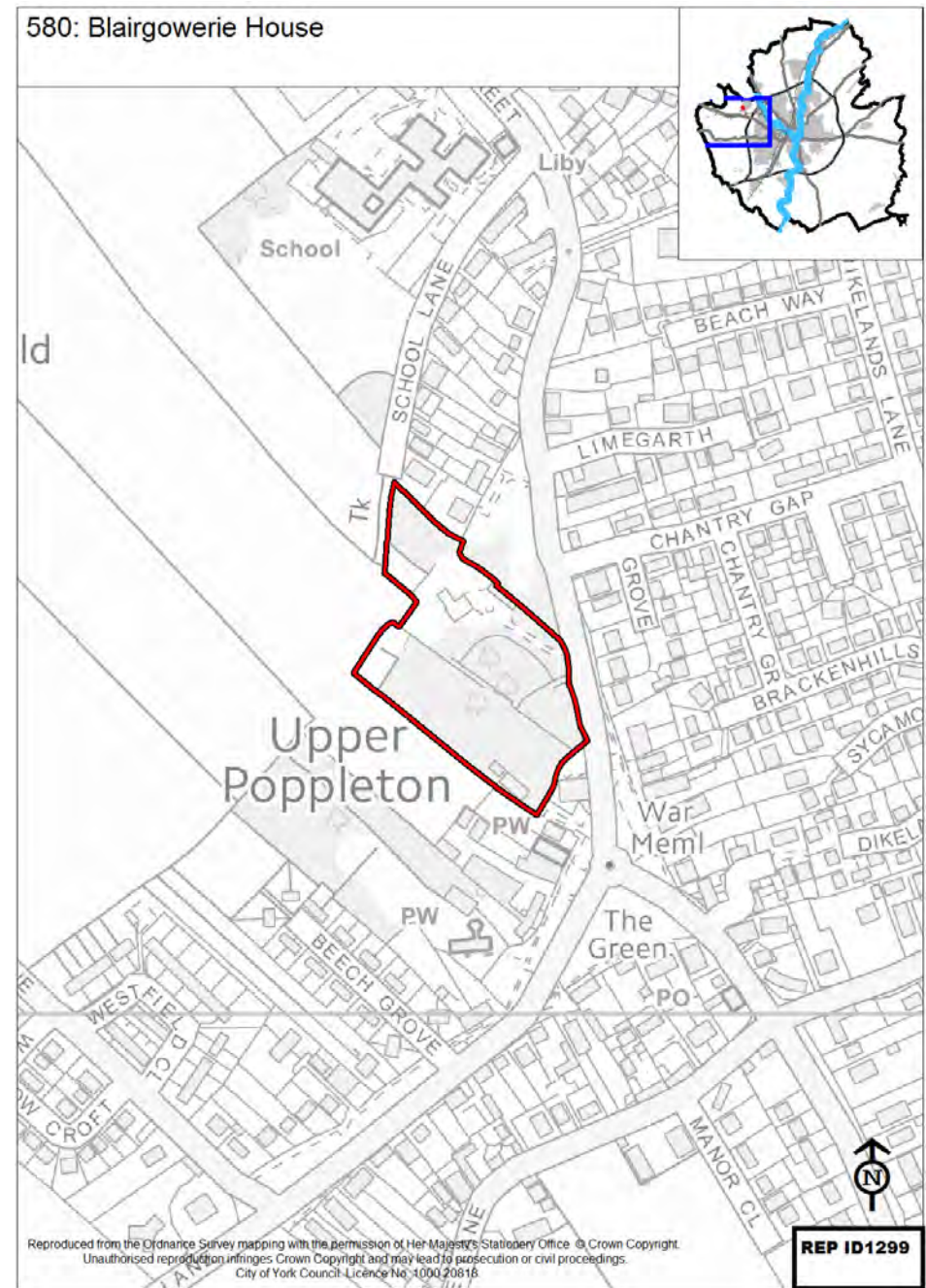
Proposed site boundary



Site 580 (formerly H36) Blairgowrie House, Poppleton
Summary of site submission

The landowner objects to removal of former allocation H36 (Boundary 580). Blairgowrie House was previously allocated in the preferred options local plan for 36 dwellings. Not clear why the site has been omitted from the plan. Site allocated in the Upper and Nether Poppleton Neighbourhood Plan but restricted to the redevelopment of the existing buildings or replacement buildings. Concerned by this approach and consider the site suitable for more than one replacement dwelling. The site is available, suitable and achievable. Appendices attached to representation include site plan and an access advice note.

Proposed site boundary



Site 687 - Land East of Northminster Business Park

Summary of site submission

Land at North Fields Lane (Adjacent to Northminster Business Park): We support the designation of ST19 as strategic employment land. In view of the need to identify additional employment land our clients land to the immediate east of North Field Lane is an obvious choice. as with the characteristics for ST19 set out at paragraph 3.98 f the Plan the land is well contained. The northern part of the site is already developed (Oakwood Business Park) and development would have no significant effect on the openness of the greenbelt or cause harm to its purposes set out in NPPF. The ring road is clearly a defensible boundary and there would be no ecological impacts nor harm the proposed site of local interest to nature conservation to the north. More new housing sites will be required to meet the OAN this land may also be considered for housing - the whole of ST9 plus additional land to the immediate east may alternatively be considered for housing allocation.

Proposed site boundary



Site 737 - Stock Hill Field, West of Church Balk, Dunnington.

Summary of site submission

Site passed selection criteria 1-4 but failed technical assessment on a point of landscape harm. Site is not in conservation area and it is unclear why it was scored negatively. The site performs none of the 5 purposes of green belt. Site should be allocated for housing.

Proposed site boundary



Site 752 - Land at East Field Wheldrake

Summary of site submission

(site ref: 752 at Further Sites Consultation 2014) - Previously we have passed comment on the absence of safeguarded land in the Sept 2016 Consultation. The tight inner and inset green belt boundaries now proposed are unjustified in relation to the latest OAN and increased housing needs derived from the recently published national methodology. There is no flexibility within the draft plan for contingencies from allocated housing sites. Draft Policy DP1 proposes an outer boundary for the Green Belt 6 miles from the city centre. The whole of Wheldrake is more than 6 miles from the centre. No justification is provided for extending the green belt to include the village. Accordingly the outer boundary should be re-drawn. This would provide an opportunity to allocate land at East Field (Site 752) for housing - consistent with NPPF paragraph 84. Failing that the site could remain unallocated but available to meet housing needs. The site fulfils none of the 5 green belt purposes nor any other undeveloped land surrounding the village. The Plan is neither justified nor consistent with national policy in respect of green belt policy and it is demonstrably not necessary to include site 752 (see NPPF paragraph 85 2nd bullet point)

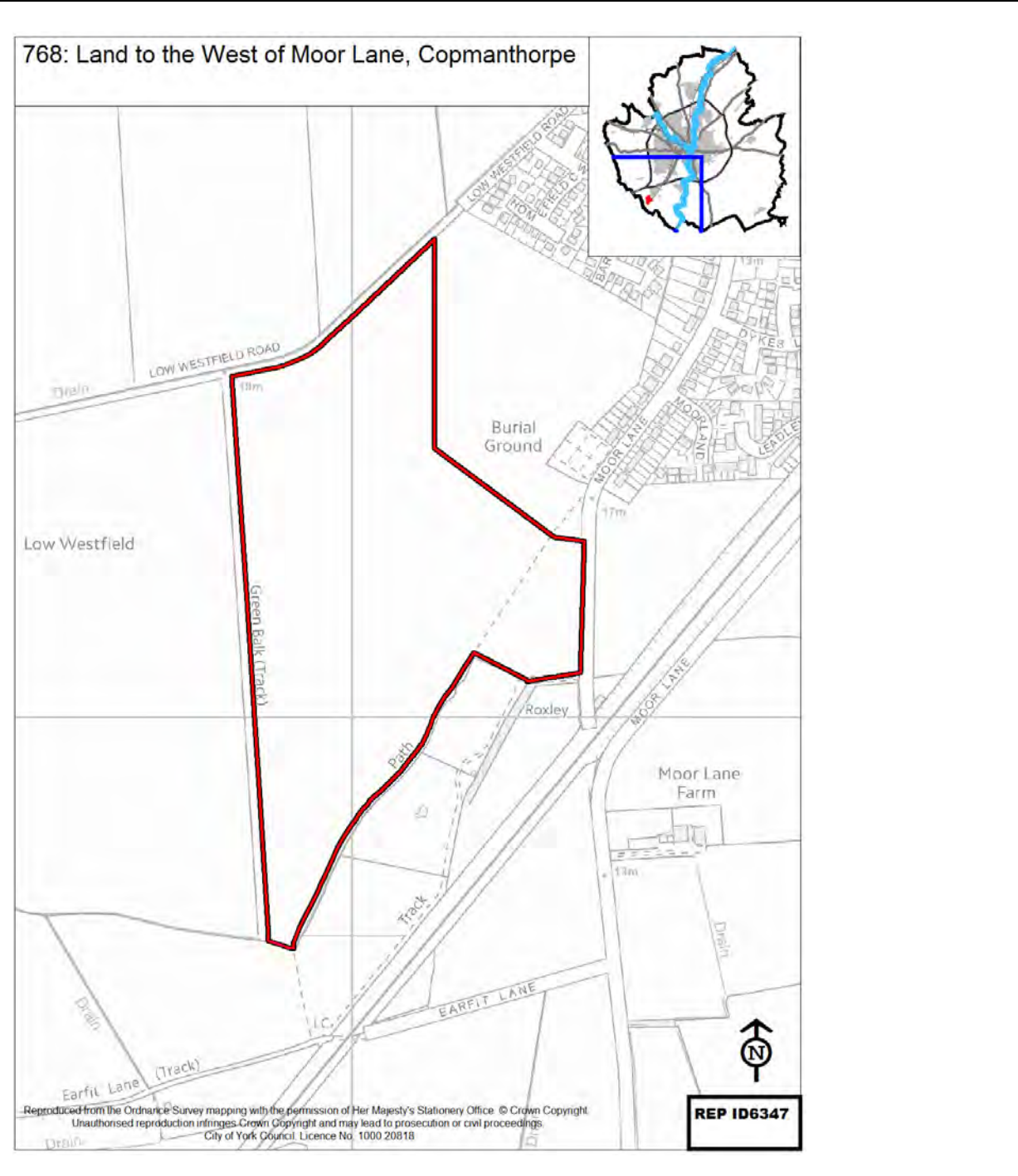
Proposed site boundary



Site 768 (formerly part of SF5) - Land to the West of Moor Lane, Copmanthorpe
Summary of site submission

Formerly part of SF5 in 2014 Publication Draft Plan. Land to the West of Moor Lane, Copmanthorpe. 15.34ha. Council's overall assessment of housing requirement is flawed. Site should be reconsidered for approx 350 dwellings. Site has willing landowner and could contribute to delivery of housing within the first 5 years of the plan. Detailed analysis of York's housing requirement and of the plan's proposed housing allocations. Attached: Location Plan, Indicative Land Use Plans, Analysis of Proposed Allocations and Expected Rates of Delivery.

Proposed site boundary

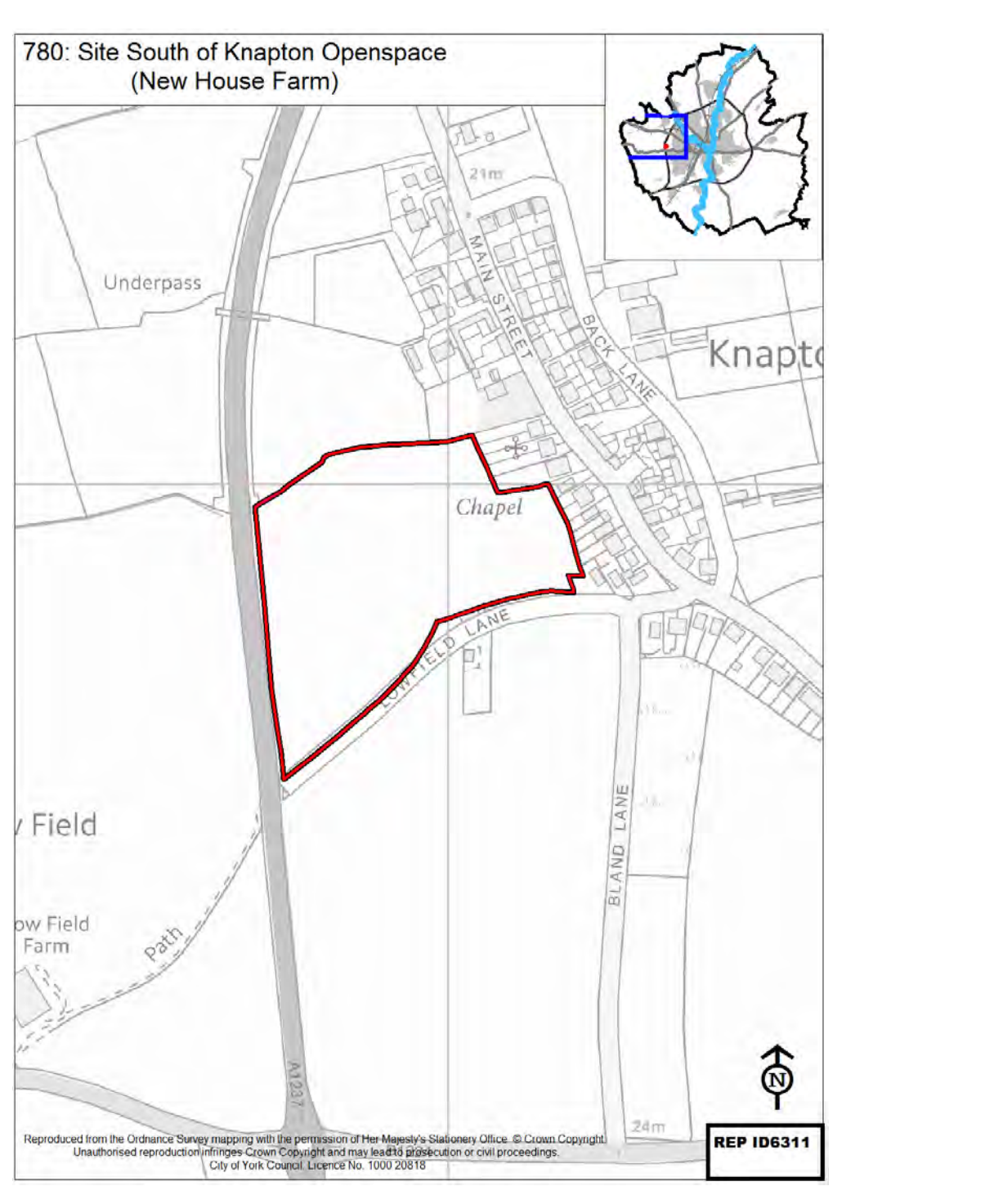


Site 780 - Site South of Knapton Openspace (New House Farm)

Summary of site submission

Concern that the Green Belt will preclude infill between existing buildings. Should reconsider an alternative site put forward in the Local Plan Preferred Sites July 2013 - Fields ID: SE5551-9795 and SE5552-9601. OS Parcel ID 9795 and OS Parcel ID 9601. The site already has previous development. The Council gave permission to build next to this site. The land has development potential keeping within the current building line.

Proposed site boundary



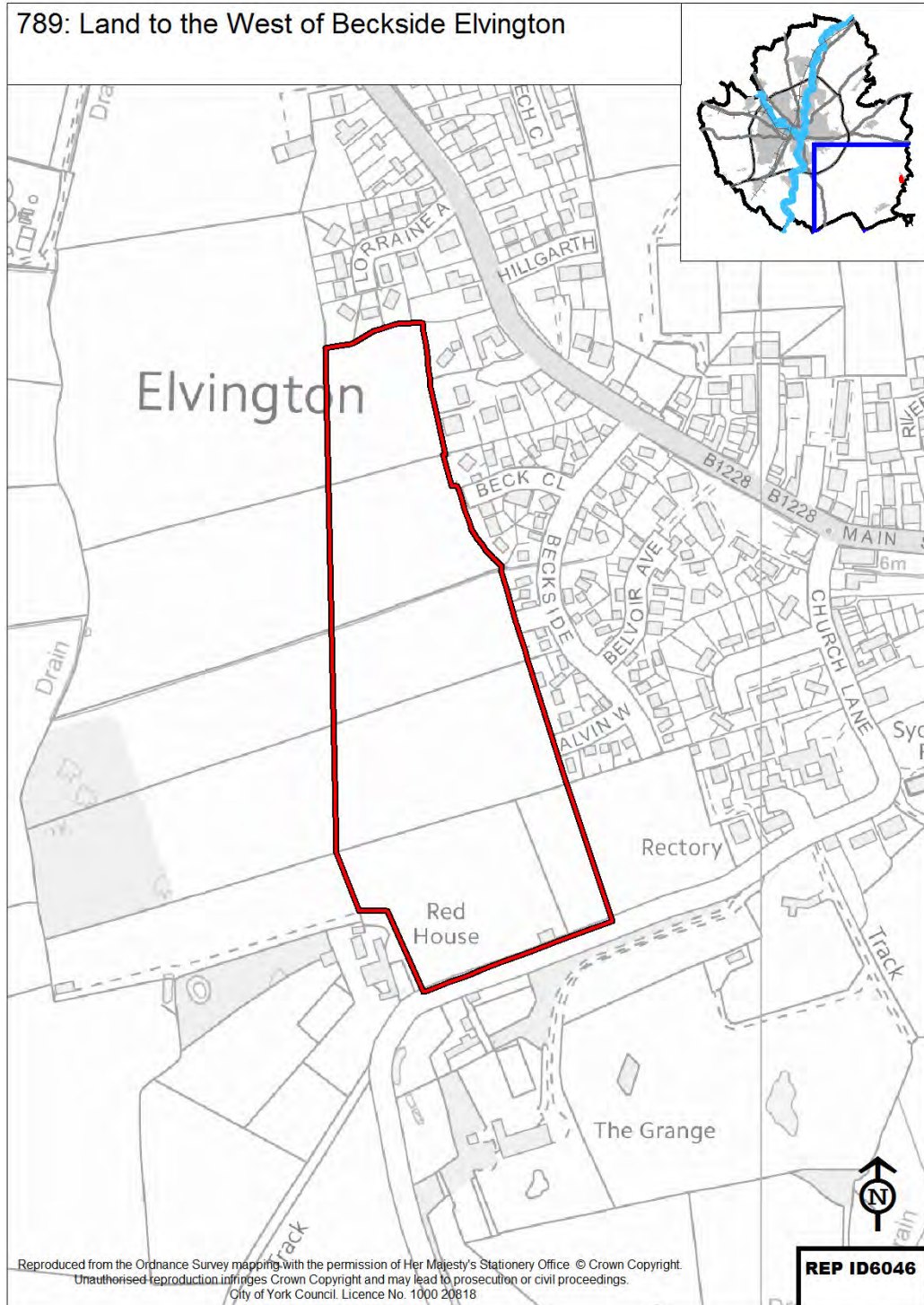
Site 789 - Land to the West of Beckside Elvington

Summary of site submission

Site 789: If the Council were to review their approach to safeguarding land for future development, site 789 should be considered for removal from the Green Belt, given the continued demand for housing in Elvington (comments submitted from earlier Local Plan consultations still relevant).

Proposed site boundary

789: Land to the West of Beckside Elvington



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Site 792 - Land South of Foxwood Lane, Acomb - Duplicate Summary of site submission

Rep is made in respect of the site Land South of Foxwood Lane, Acomb. Enclosed are a site location plan (appendix 1), Initial Access Appraisal: White Young Green (appendix 2), Potential Landscape Impact: Wainwright Landscape Architecture Assessment (appendix 3). It is considered that the Council has incorrectly assessed a site previously submitted for housing in the current Local Plan Draft. The site is known as 'Land south of Foxwood Lane, Acomb' it is considered that the development of the site for housing would not adversely affect York's historic or natural environment; it is accessible to sustainable modes of transport and a range of local services and facilities; it would not lead to an unacceptable level of congestion or pollution; and the site is not subject to flood risk (from either rivers and the sea or surface water). The only criteria it does not meet is that it is not a brownfield site; it is a greenfield site, however, there are few brownfield sites left within the City Plan area due to the timescale since the last plan (and the associated draft Green Belt) was put in place. As such, housing sites across the Plan area will have to be on both brownfield and greenfield land. This site does follow recognisable physical features that will endure (e.g. a hedgerow runs along the southern boundary of the site). Goes into detail on defensible boundaries, compliance with paragraph 80 of NPPF, proximity to amenities and schools. Based on the site boundary (equating to 4.5 hectares), the development yield for the site would be circa 144 - 180 units (based on an 80% developable area at 40 to 50 dwellings per hectare respectively). However, it should be noted that this number is indicative only and has not been subject to a detailed design exercise. Therefore, should the site be allocated for housing and deleted from the Green Belt, issues such as open space provision and other design requirements can be taken into account and this may result in an amendment to the indicative yield. It should be noted that a joint approach has been taken and discussions have resulted in both parties supporting the allocation of the land to the south of Foxwood Lane for housing. This larger allocation was considered by the local planning authority and their evaluation of this option was set out within Appendix 4 ('Changes to Allocated Sites') of the Further Sites Consultation. In response to the site within the ownership of the YDBF, the technical officer assessment concluded that the site failed Criteria 1 and, as such, recommended that the site boundary for H9 should not be enlarged and should instead remain in its current form. In previous consultations, the technical officer assessment contained within Appendix 4 of the Further Sites Consultation identifies three main constraints in respect of the potential enlargement of site which was previously identified as Site H9 in the earlier consultation document: Drainage/Flood Risk; Access; and, Landscape Impact. Goes on to provide further detail on each, encloses flood map; information on transport links and local landscape.

Proposed site boundary

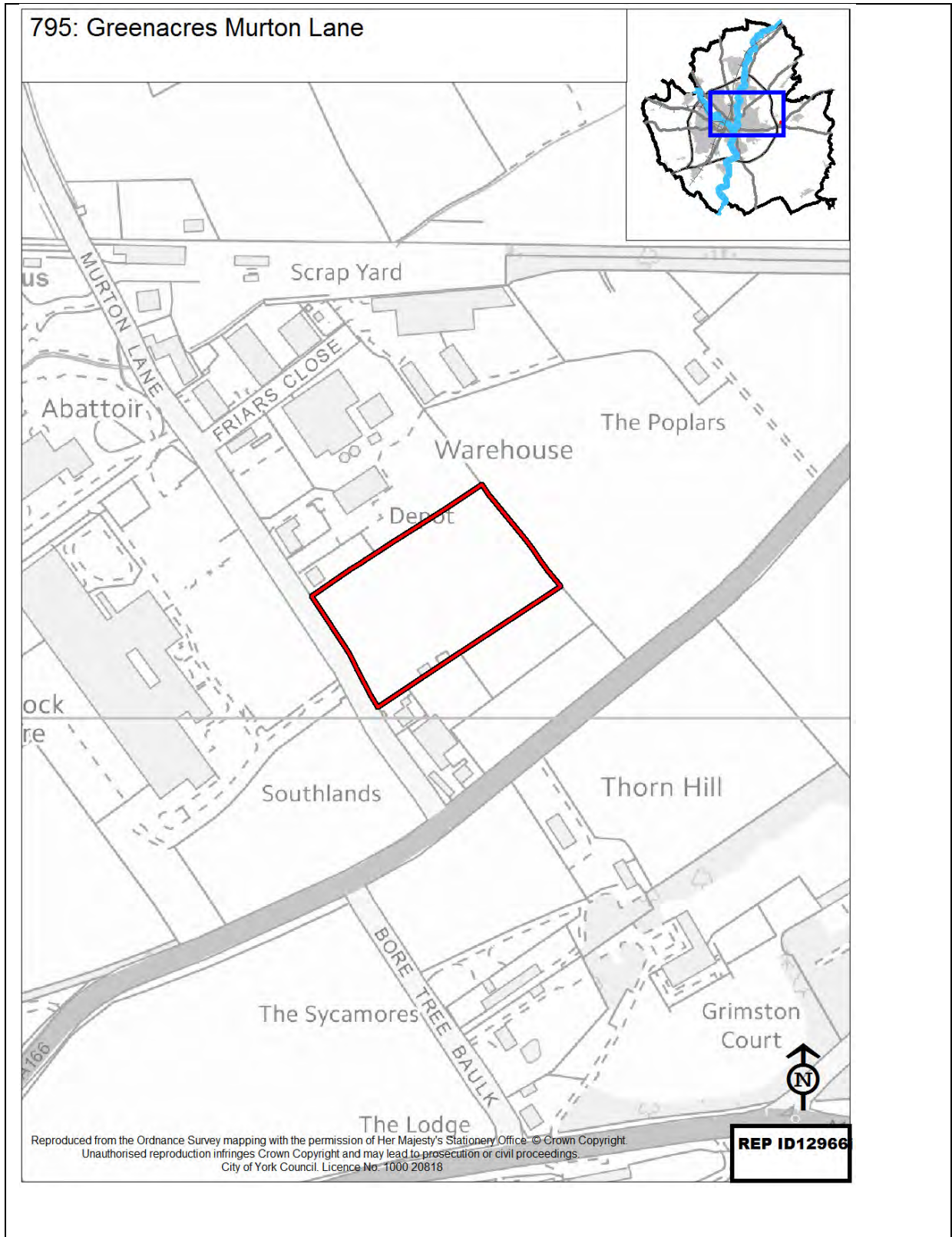
792: Land South of Foxwood Lane, Acomb



Site 795 – Greenacres Murton Lane**Summary of site submission**

Rep is made in respect of the site Land South of Foxwood Lane, Acomb. Enclosed are a site location plan (appendix 1), Initial Access Appraisal: White Young Green (appendix 2), Potential Landscape Impact: Wainwright Landscape Architecture Assessment (appendix 3). It is considered that the Council has incorrectly assessed a site previously submitted for housing in the current Local Plan Draft. The site is known as 'Land south of Foxwood Lane, Acomb' it is considered that the development of the site for housing would not adversely affect York's historic or natural environment; it is accessible to sustainable modes of transport and a range of local services and facilities; it would not lead to an unacceptable level of congestion or pollution; and the site is not subject to flood risk (from either rivers and the sea or surface water). The only criteria it does not meet is that it is not a brownfield site; it is a greenfield site, however, there are few brownfield sites left within the City Plan area due to the timescale since the last plan (and the associated draft Green Belt) was put in place. As such, housing sites across the Plan area will have to be on both brownfield and greenfield land. This site does follow recognisable physical features that will endure (e.g. a hedgerow runs along the southern boundary of the site). Goes into detail on defensible boundaries, compliance with paragraph 80 of NPPF, proximity to amenities and schools. Based on the site boundary (equating to 4.5 hectares), the development yield for the site would be circa 144 - 180 units (based on an 80% developable area at 40 to 50 dwellings per hectare respectively). However, it should be noted that this number is indicative only and has not been subject to a detailed design exercise. Therefore, should the site be allocated for housing and deleted from the Green Belt, issues such as open space provision and other design requirements can be taken into account and this may result in an amendment to the indicative yield. It should be noted that a joint approach has been taken and discussions have resulted in both parties supporting the allocation of the land to the south of Foxwood Lane for housing. This larger allocation was considered by the local planning authority and their evaluation of this option was set out within Appendix 4 ('Changes to Allocated Sites') of the Further Sites Consultation. In response to the site within the ownership of the YDBF, the technical officer assessment concluded that the site failed Criteria 1 and, as such, recommended that the site boundary for H9 should not be enlarged and should instead remain in its current form. In previous consultations, the technical officer assessment contained within Appendix 4 of the Further Sites Consultation identifies three main constraints in respect of the potential enlargement of site which was previously identified as Site H9 in the earlier consultation document: Drainage/Flood Risk; Access; and, Landscape Impact. Goes on to provide further detail on each, encloses flood map; information on transport links and local landscape.

Proposed site boundary



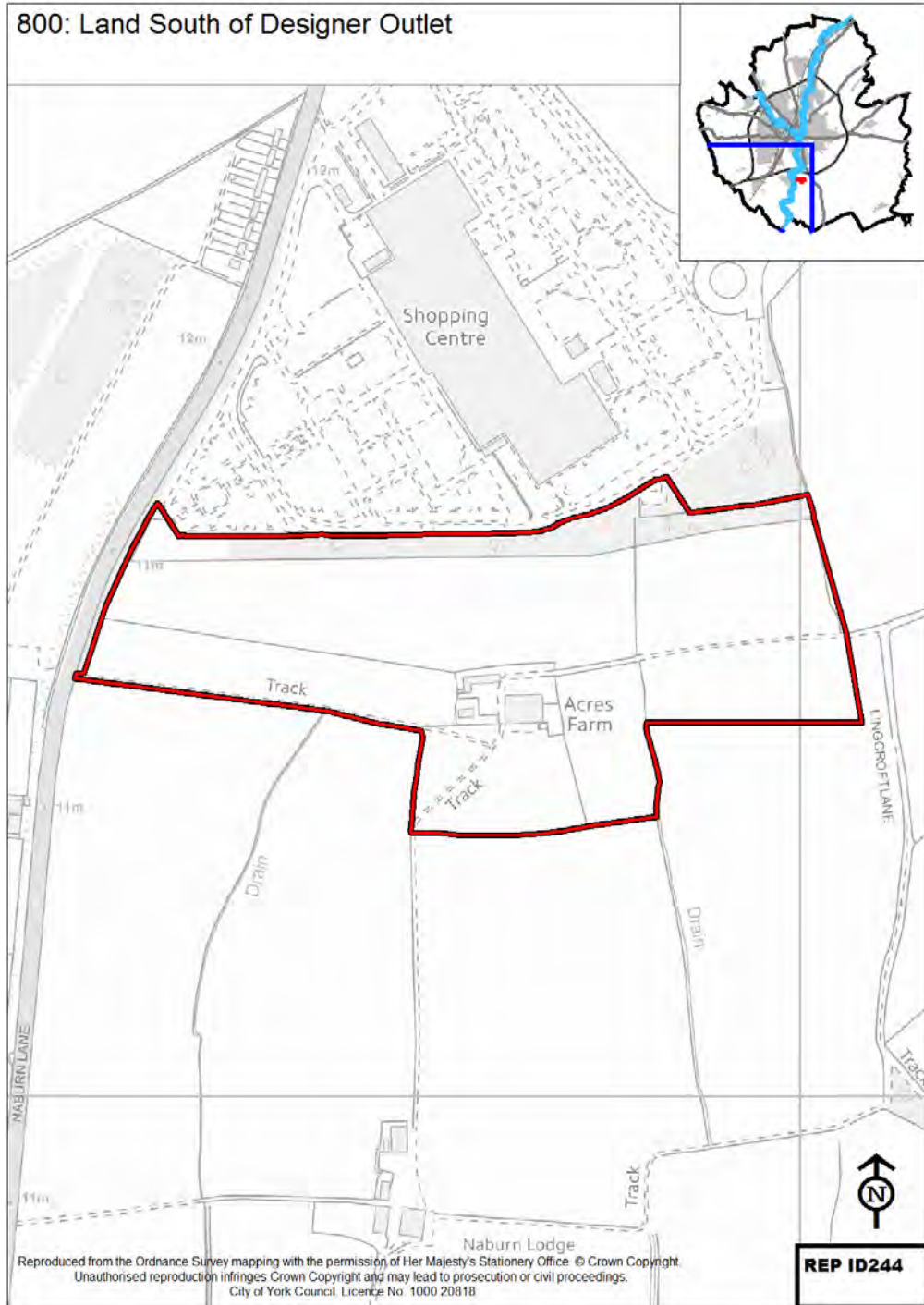
Site 800 (formerly ST25) - Land south of Designer Outlet.

Summary of site submission

Object to the former ST25 site (Land South of Designer Outlet) not being removed from the Green Belt and allocated for the relocation and expansion of the Park & Ride facility and parking associated with the York Designer Outlet.

Proposed site boundary

800: Land South of Designer Outlet

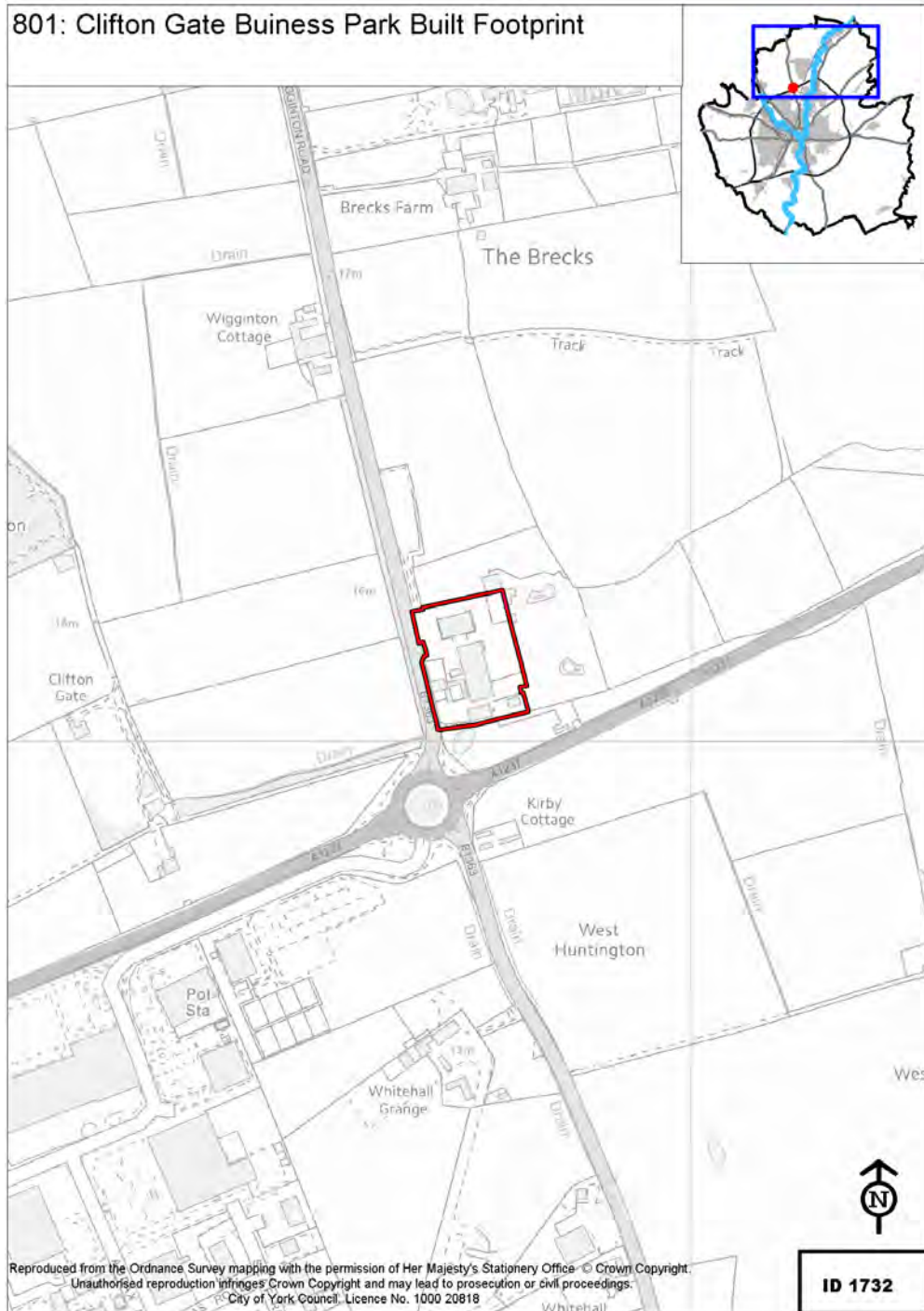


Site 801 – Clifton Gate Business Park

Summary of site submission

Support for Clifton Gate Business Park to be designated as an employment and leisure area in York to safeguard existing businesses. Consider that it has demonstrated that it is viable and sustainable. Inclusion would recognise importance of this employment site. Lack of inclusion linked to ring-road improvement scheme? Consider that recognition of the site would not compromise Green Belt purposes. Inclusion of ST37 sets a precedent for removal from the Green belt.

Proposed site boundary

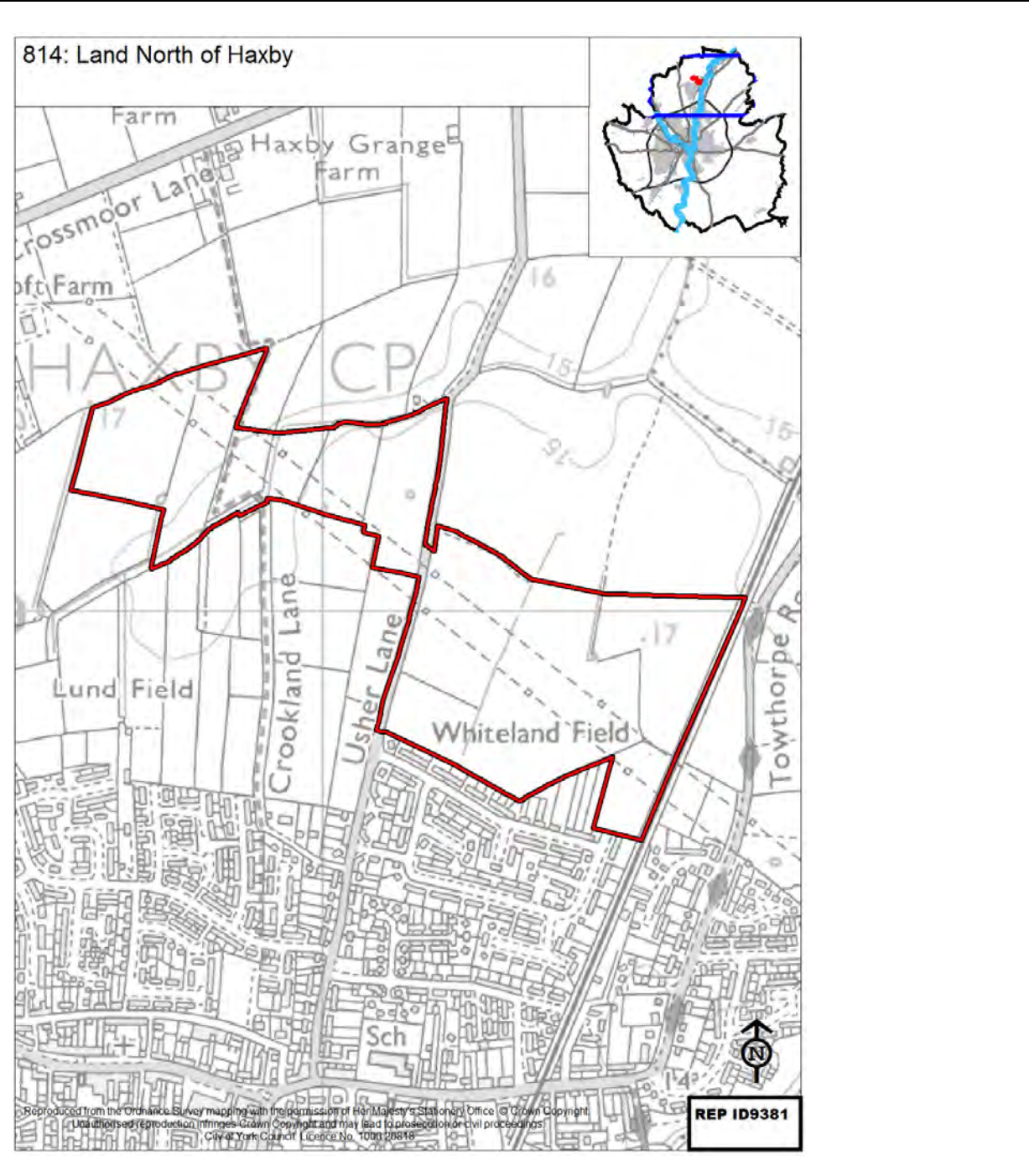


Site 814 (formerly SF4) - Land north of Haxby

Summary of site submission

Former SF4: Land North of Haxby. The council have previously assessed the site and deemed it suitable for safeguarded land. The site is available, and suitable. The site should be excluded from the Green Belt and included as a safeguarded land allocation.

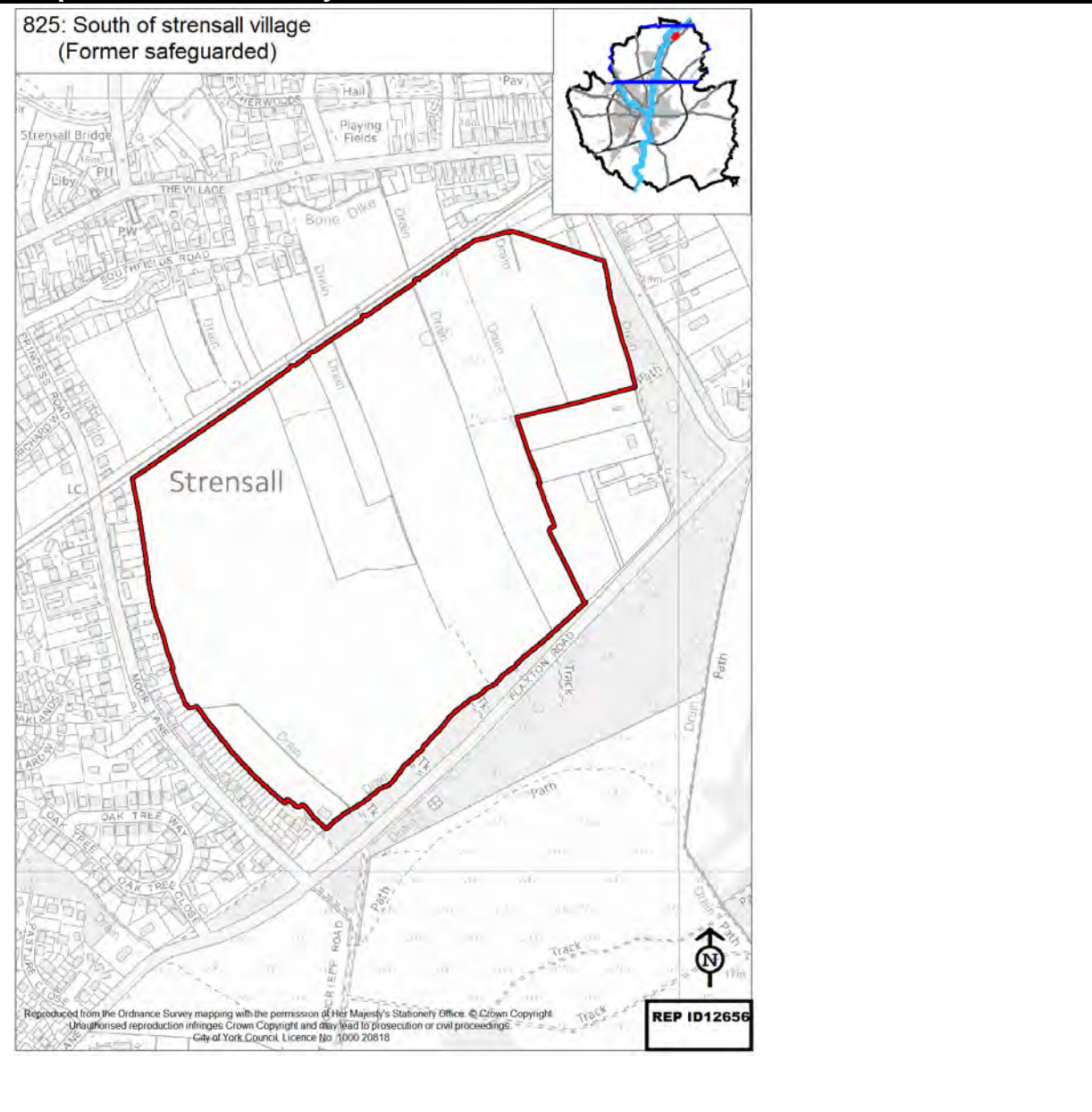
Proposed site boundary



**Site 825 (formerly SF1) - Former Safeguarded Land South of Strensall
Summary of site submission**

Lovel Developments Ltd - site size approx 29 ha which can be delivered as a reasonable rate of delivery. Site should be allocated for residential use or safeguarded land. Considered that the site is bounded by existing residential development. Currently green field used for agricultural purposes. Site is located within flood zone 1 and does not have any technical constraints to preclude delivery. Considers that it represents a sustainable urban extension to the existing village of Strensall. Site is more appropriate in green belt terms than ST14 and ST15 and GB could be established robustly using readily recognisable features. Evidence attached includes Masterplan document (previously submitted).

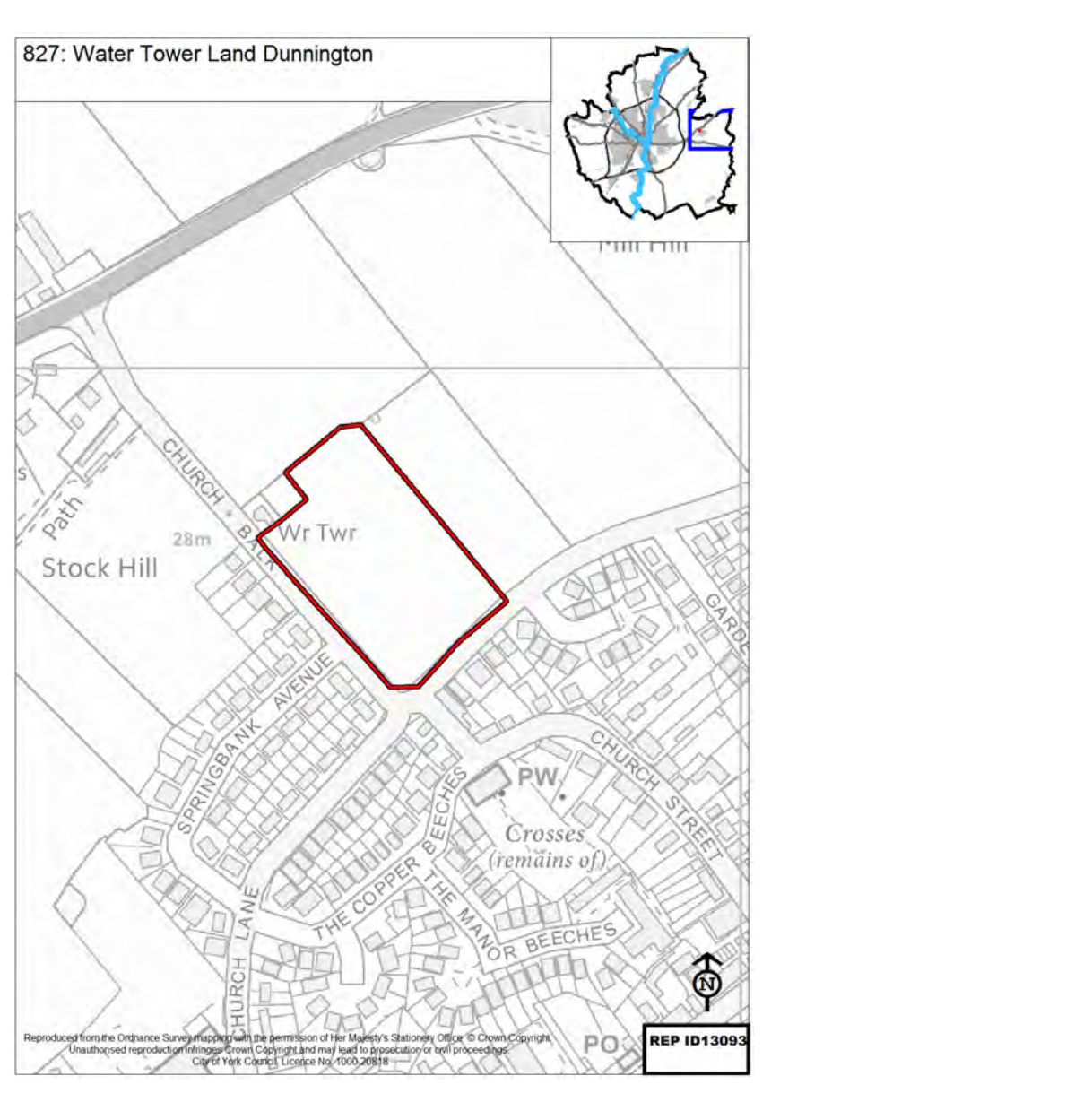
Proposed site boundary



Site 827 (formerly H33) - Water Tower Land Dunnington
Summary of site submission

Jorvik homes object to the sites omission as an allocation in the plan. The site is proposed for 1.8 ha (boundary 827) for around 55 homes. Subject to planning , phase 1 development could start in 2020. Current use is grazing land. It is considered that the proposed development would be in line with the northern extent of the village on the opposite side of the road and that this area has already been compromised by development at the south end of Church Balk. Openspace could be provided to northern corner and would create a degree of symmetry or could include parking at southern corner so it is well related to church (for whom intended). The housing limit in either design does not extend beyond the water tower or approved expansion to cemetery. The boundaries of the site are clearly definable for Green Belt. Access is off church balk but to north of existing junction so majority of traffic not travelling through village. Attached is response to PSC (2016) and indicative masterplans.

Proposed site boundary

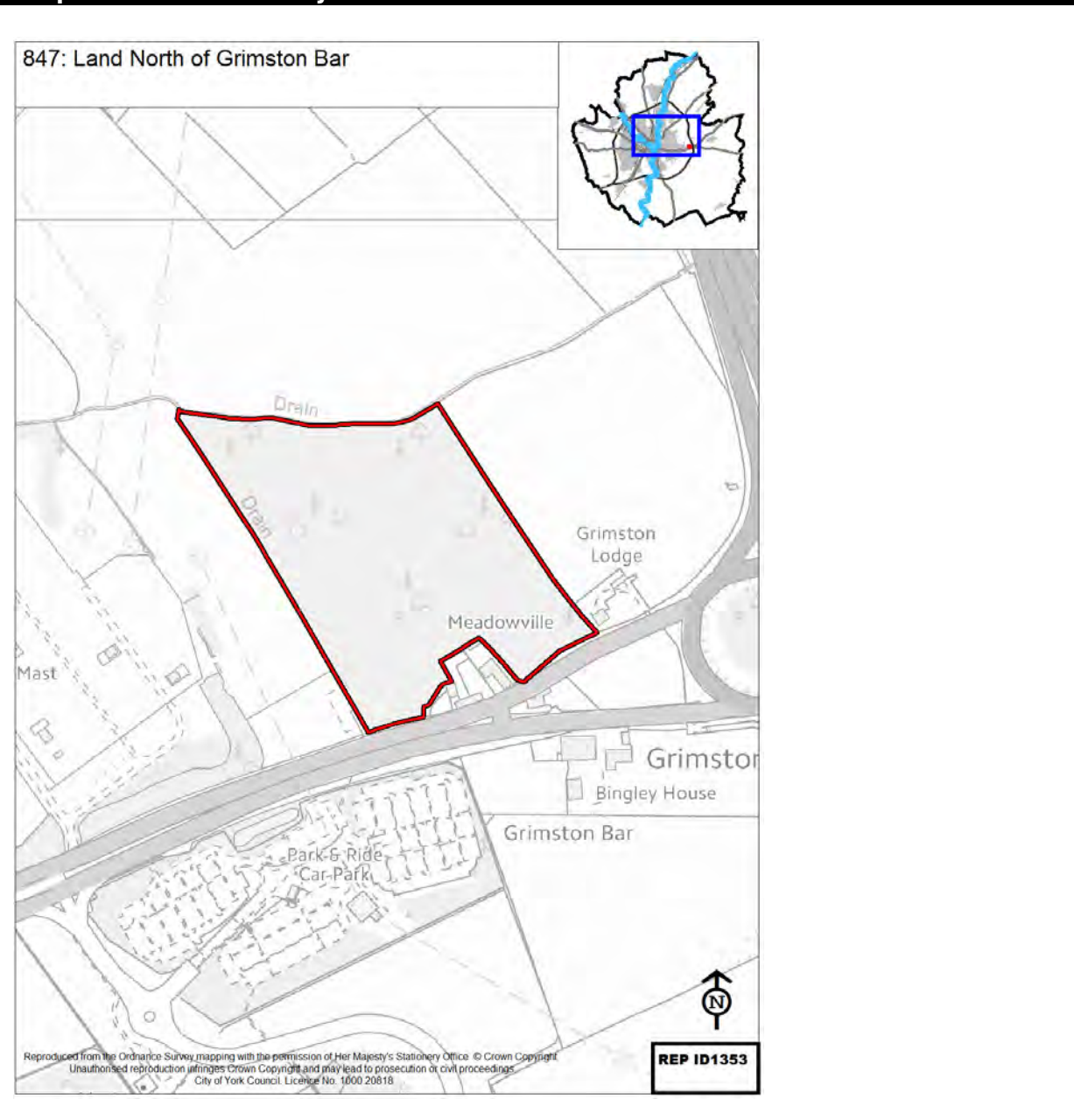


Site 847 (formerly ST6) - North of Grimston Bar

Summary of site submission

Land to North of Hull Road and West of A64, Grimston bar (site ref: ST6 in Sept 2016 draft Plan consultation) - previously identified for employment and residential use and received officer support. Technical reports submitted in Sept 2016 consultation remain valid. In addition to uses previously identified landowners have been in discussions with hotel operators and agents for a private school. Both could co-exist alongside residential and/or employment uses whilst retaining an open buffer along A64. Retention of ridge and furrow would maintain the open break between the site and Murton and should prevent coalescence. There is insufficient land in the Plan for residential development and there needs to be a greater number of small and medium sized housing sites that will compromise annual housing delivery especially in the early to middle years.

Proposed site boundary



**Site 859 (formerly SF15) - Land To the North of Escrick
Summary of site submission**

SF15 - Land to the North of Escrick: Would add the following to the submissions by DPP on behalf of Linden Homes: The site passed all site selection methodology tests with no technical showstoppers - based on a series of technical, landscape and deliverability reports submitted by the landowner at an early stage of the process. No objection was submitted to the site by Deighton Parish Council to the allocation. At an open meeting (Hosted by Selby DC officers as part of the Selby Local Plan process) Escrick PC representatives confirmed that SF15 was their preferred option - although they expressed their concern about the size of the site and requested that only the southern part be allocated and the northern part be designated as safeguarded land. It appears that CYC's decision not to carry forward the allocation was based on representations made on behalf of Selby District Council (though not endorsed by Selby District Council) via DtC. In light the need for the Local Plan to identify additional housing sites, particularly small and medium sites, it is proposed that as an alternative to the site submitted by DPD, at least the southern part of the site should be allocated for housing now, with the remainder identified as safeguarded land.

Proposed site boundary

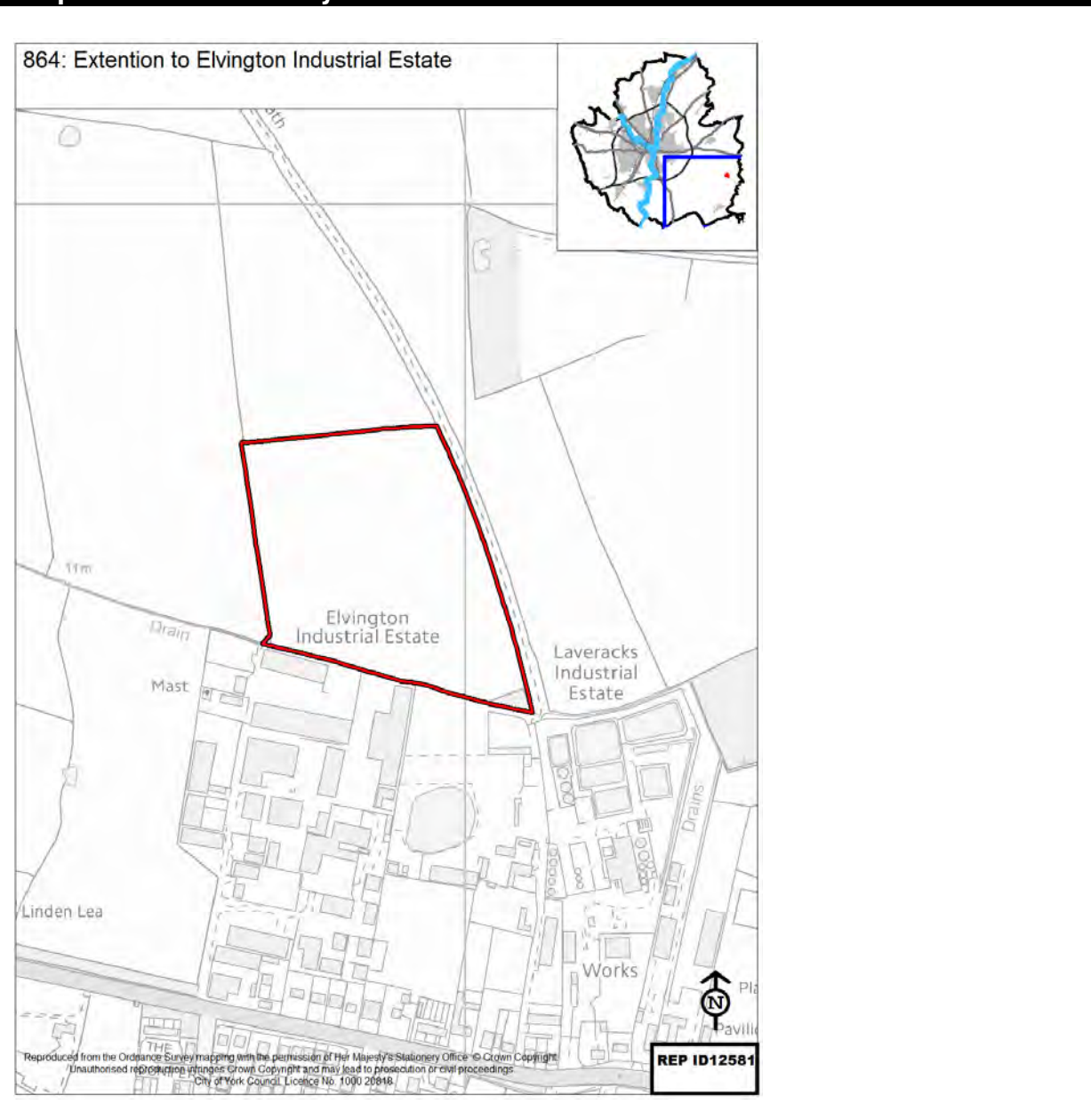


Site 864 - Extension to Elvington Industrial Estate

Summary of site submission

Suggested land is located immediately to the north of the existing Elvington Industrial Estate and is currently used for agriculture. Wants to allocate land in the local plan for employment uses (B1, B2, B8). Site is not in the current plan. It is 5.4ha in area. Represents a logical extension to the existing Elvington Industrial Estate and is accessible from the north of the estate. The site is accessible, benefits from a willing landowner, not in flood risk, is low archaeological potential, not close to listed building, is of very low biodiversity value (arable field) and not high quality agricultural land (not grades 1 or 2). The existing Industrial Estate has high occupancy, so area is commercially sound and there is an unmet demand for additional employment floorspace in this area. Site's boundaries are defined by mature hedgerow and location means development would not be visible from many public vantage points.

Proposed site boundary

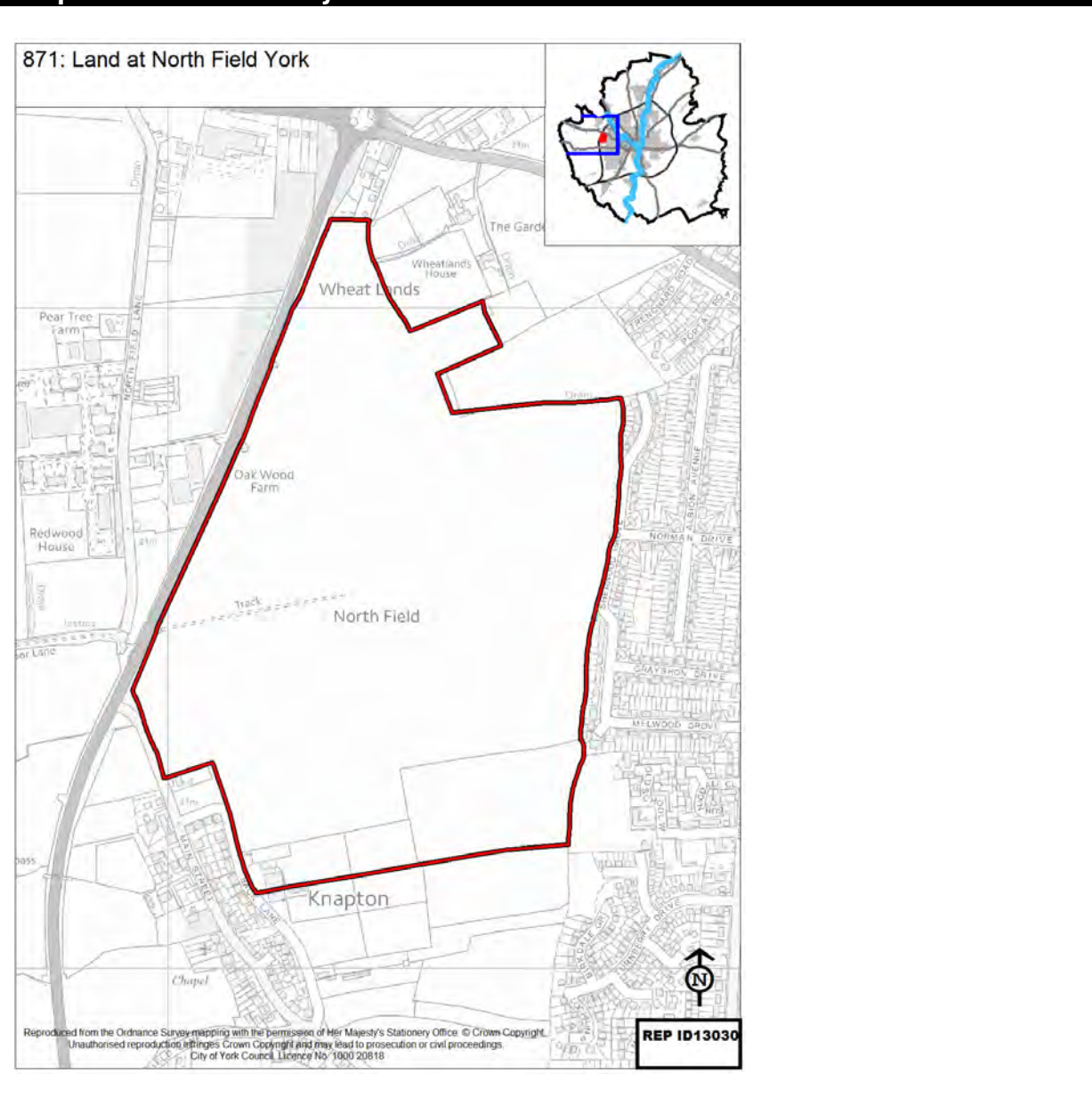


Site 871 - Land at North Field York

Summary of site submission

The report [representation] builds on representations made by Gallagher Estates to the Preferred Sites consultation undertaken in 2016. Reiterates a case put forward for the release of land at North Field, York from the Green Belt and its allocation for residential development through the Local Plan. The site provides the opportunity to deliver a high quality, residential development making a significant contribution to meeting the strategic housing requirements of the city which is well located with good access to the existing sustainable transport network and which can be delivered in a manner that is sensitive to its landscape setting and without significant harm to the Green Belt around York and its function - the site does not perform a critical role in protecting and enhancing the significant historic setting and character of York, as the main purpose of the York Green Belt. This is verified by the absence of views of the York Minster and other historic assets from this side of the City.

Proposed site boundary

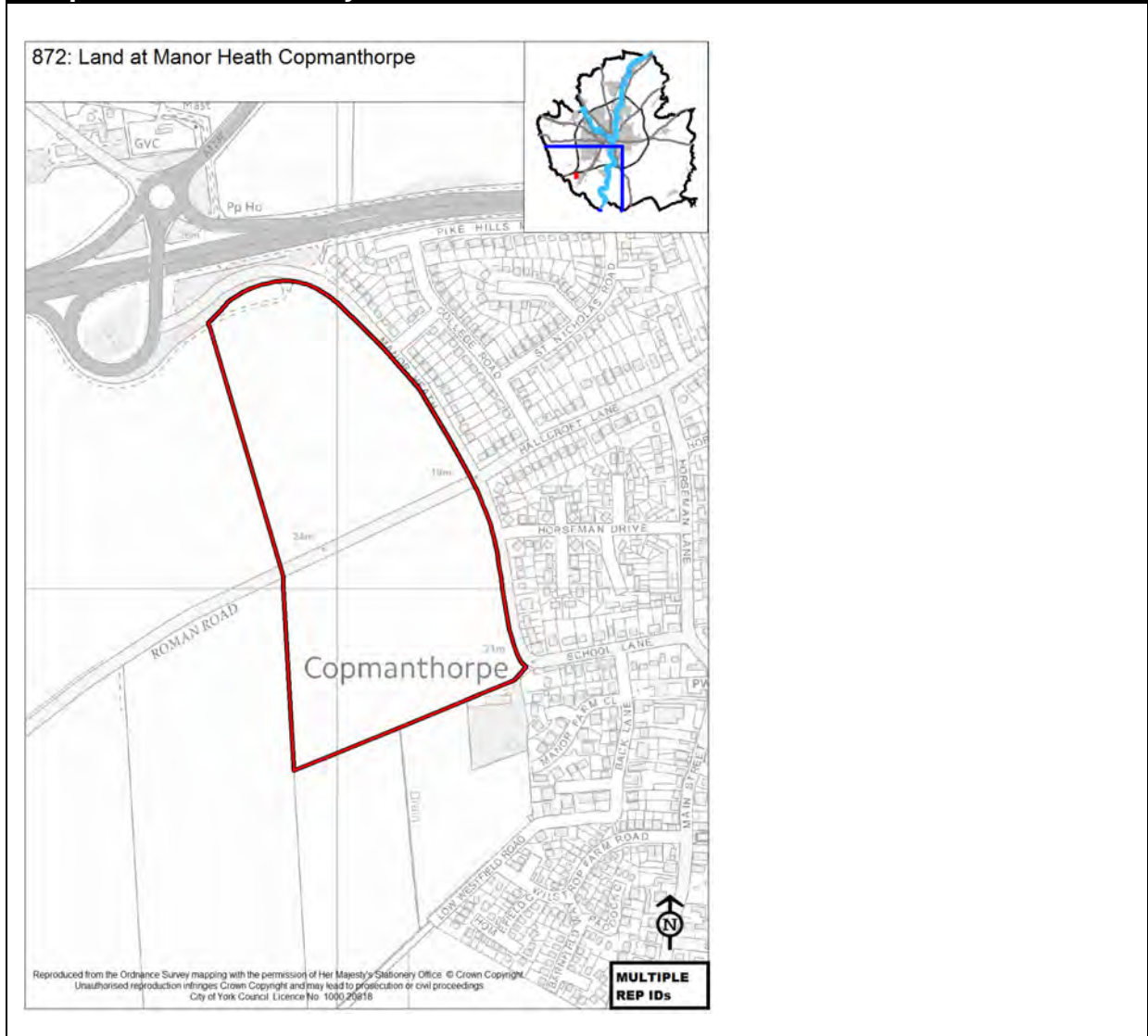


Site 872 (formerly ST12) - Manor Heath, Copmanthorpe

Summary of site submission

Former allocation ST12: Land at Manor Heath, Copmanthorpe. Smaller site boundary proposed. Strongly object to the omission of the site as an allocation in the Plan. The site is suitable, deliverable and viable and has a willing landowner full supportive of the development. Ability to deliver 250 dwellings at 32 dph on 14.89ha site with additional 5.44 ha openspace on western boundary (14.11 ha total). The site is considered to be in a highly sustainable location in respect of the existing settlement and has no technical or environmental (natural and built) constraints that would preclude development of the site. The site is not located within an area of historic character and setting and does not compromise York's future Green Belt. Agree with officers' assessment set out in 2013 and 2014. Evidence base produced previously (not attached) is summarised in attached proposed Development Brief. A revised masterplan (attached) is for a smaller allocation to address and minimise previous concerns in relation to historic character and setting and landscape. This site is preferred to ST31.

Proposed site boundary



Site 873 - Land to the East of the Designer Outlet

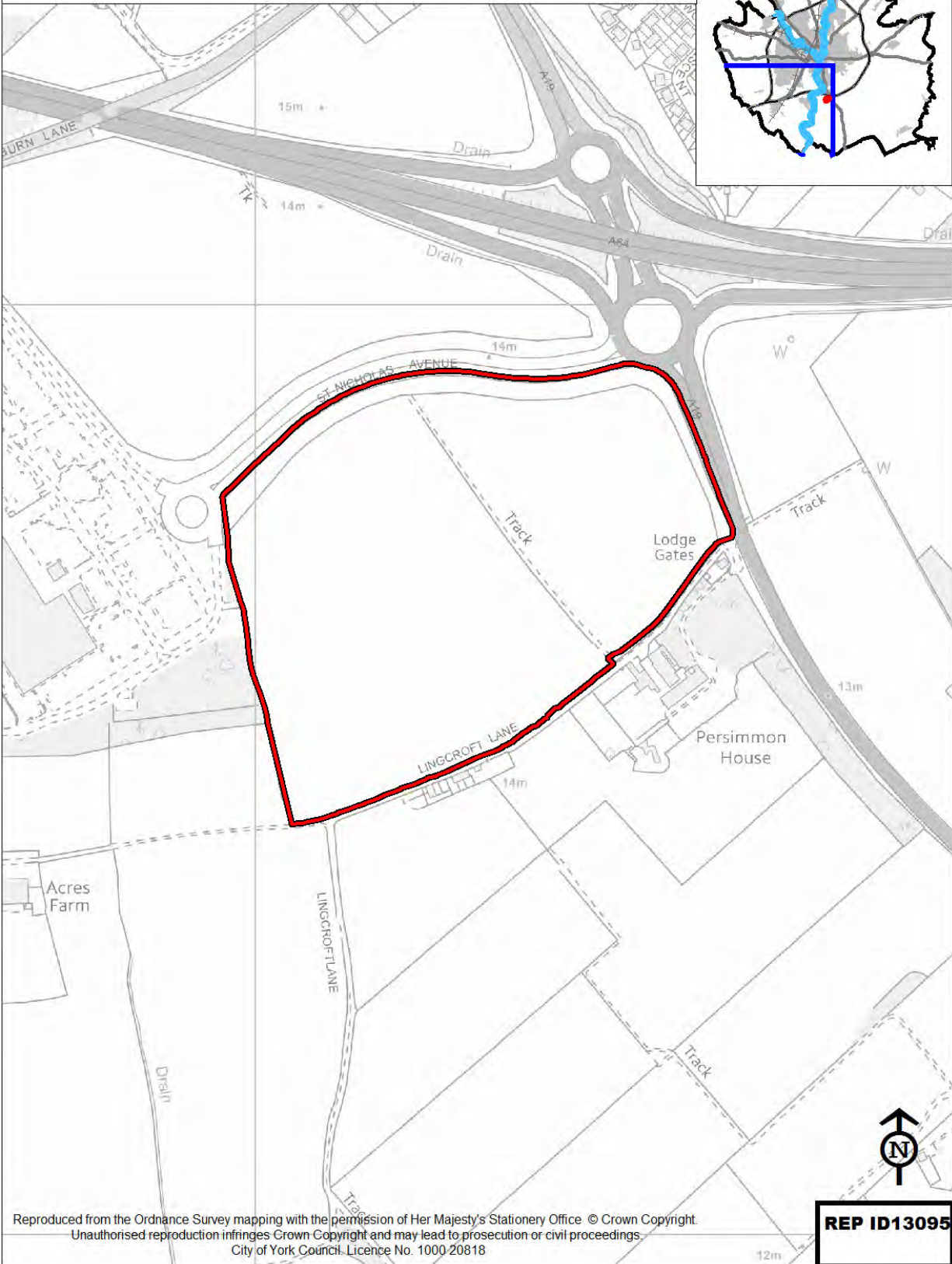
Summary of site submission

General Address: Land to the East of the York Designer Outlet. Site 873 in the Local Plan Working Group Report 10th July 2017 Annex 4: Officers Assessment of Employment Sites following PSC. Site Size: 18ha (approx) Preferred Use: Naburn Business Park (B1a) Technical Documents: 1. Regeneris Report - A Case for a New Business Park in York, 2. Regeneris Addendum 3. Heritage Settings Assessment - Interim Statement, 4. Interim Landscape and Visual Briefing Note, 5. Masterplan, 6. Strategic Access and Connectivity, 7. Sustainability Appraisal (SA).

Summary of technical evidence submitted: Regeneris Report and Regeneris Addendum, the total amount of office floorspace (B1a) required to meet jobs growth has increased significantly. In quantitative terms there is a need to identify additional sites which could include Naburn Business Park. Continued reliance on York Central means there would be insufficient choice for investors. It is unlikely that the identified sites will meet the demand for B1a office space in the short to medium term (particularly York Central). The approach promoted in the Reg 18 draft Local Plan is not in accordance with Para 160 of NPPF. Heritage- the evidence base that established the historic character and setting areas is out of date and needs to be reviewed. The Heritage setting assessment indicates that the setting of nearby designated heritage assets suggests that the site does not form an important component of the setting of any nearby designated heritage asset. Landscape and Visual Briefing Note - the site would be suitable to accommodate the development type proposed with no adverse effects on the landscape and visual amenity. A master plan has been produced which took into account the key opportunities and constraints of the site. Highways - changes to Fulford Interchange to improve capacity are deliverable. Traffic impacts are considered capable of being accommodated or mitigated. SA - considered locational and physical attributes of the site. The site is capable of providing a readily supply of employment opportunities for highly skilled existing and future residents.

Proposed site boundary

873: Land to the East of the Designer Outlet

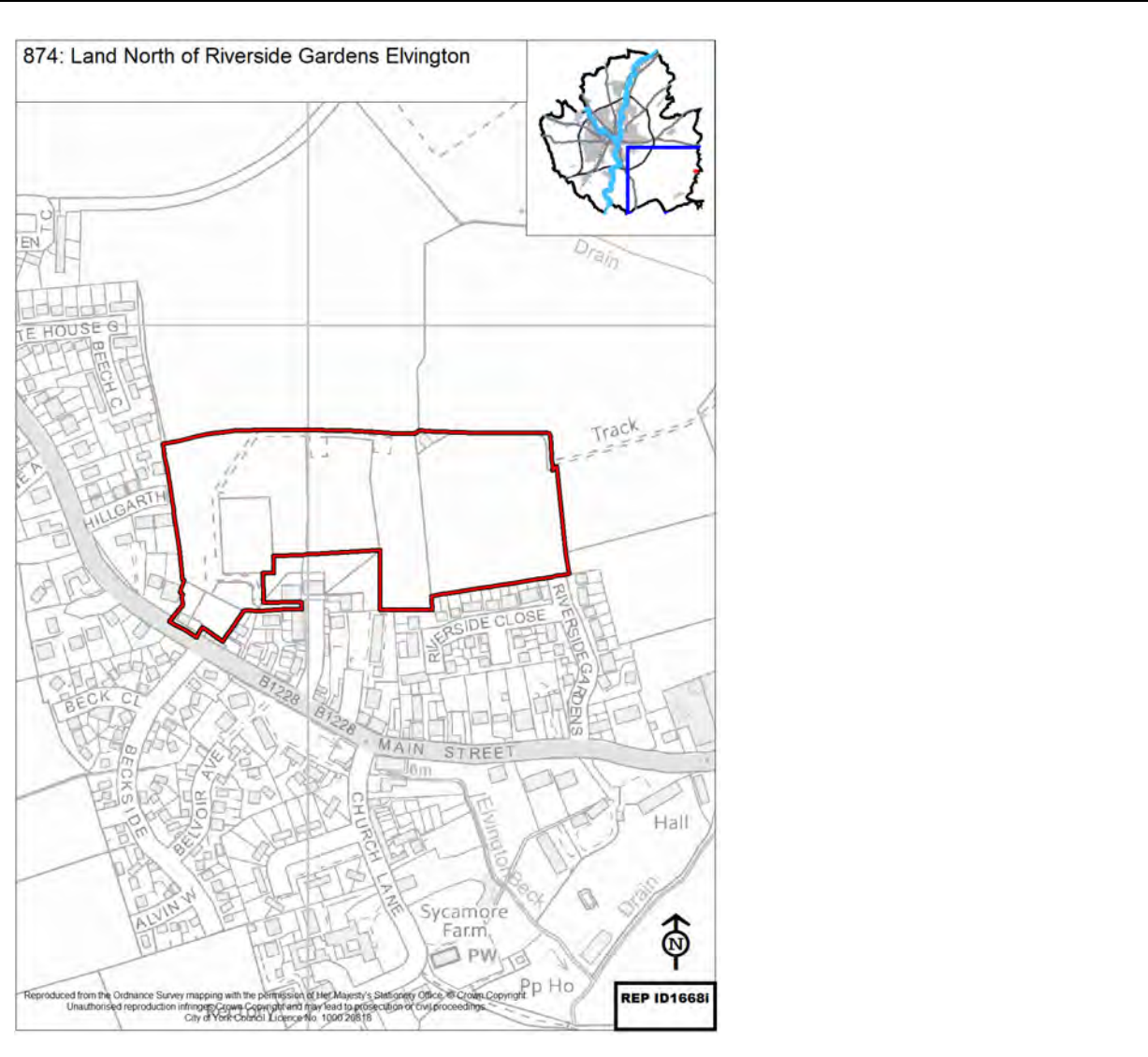


Site 874 (formerly SF10) - Land North of Riverside Gardens Elvington

Summary of site submission

Barratt and David Wilson Homes object to this site being rejected as a potential housing allocation. The proposal has the potential to provide a high quality development of up to 110 homes, alongside the delivery of public open space and associated infrastructure. The site offers the opportunity to help meet York's current and future housing needs. The proposals will deliver a development which respects the character of the surrounding area whilst seeking to incorporate 21st Century designs to provide a high quality residential development. The site is deliverable and located in a highly sustainable location. The site is available now as it is under the control of a national housebuilder who is actively seeking the site's allocation for development. The site can also be considered achievable as new homes can be delivered on the site within the next 5 years and indeed within the first 5 years of the Local Plan. There are no technical or environmental (built and natural) constraints that would preclude development of the site.

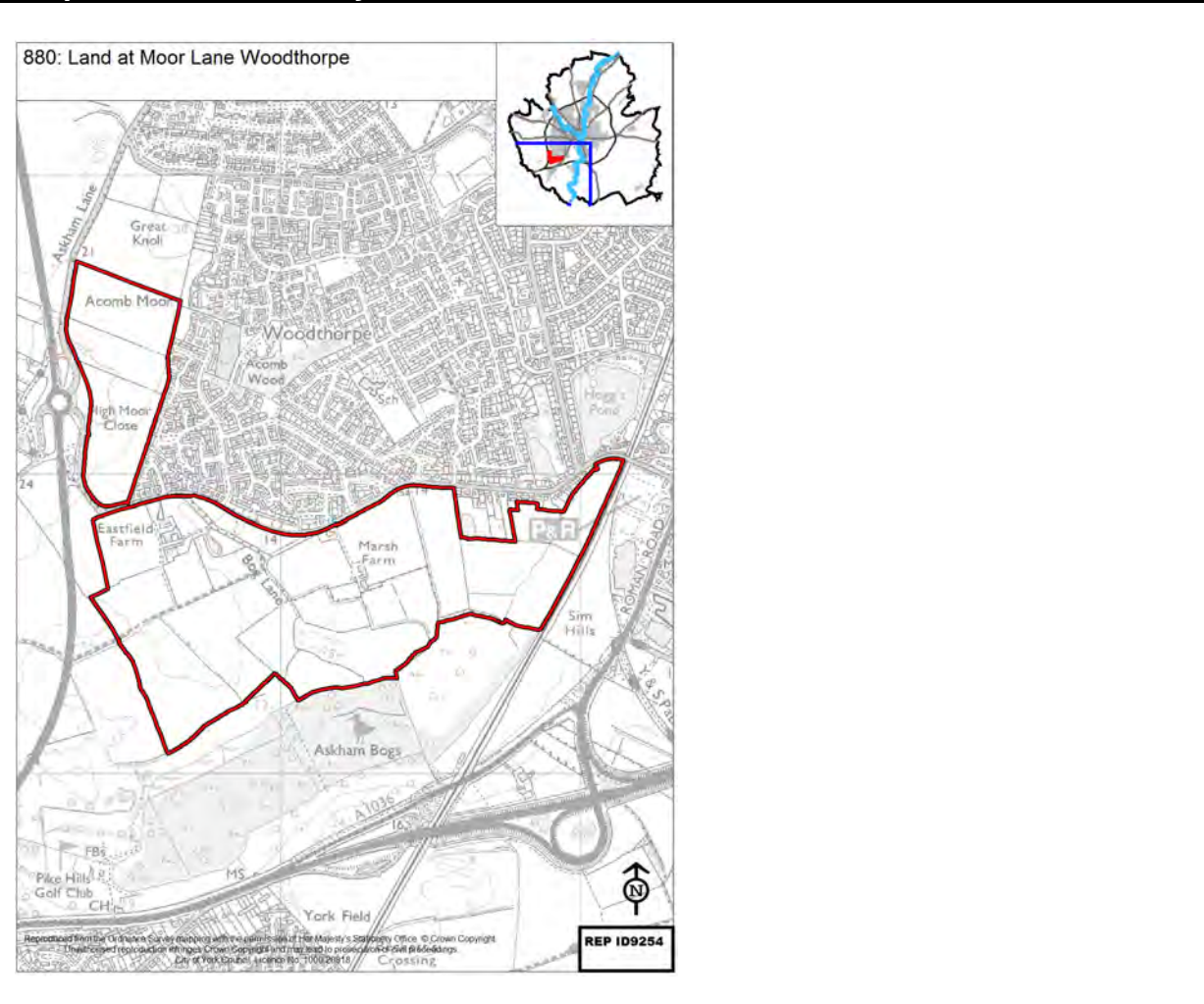
Proposed site boundary



Site 880 (formerly ST10 / SF12) - Land at Moor Lane Woodthorpe
Summary of site submission

Alternative ST10: Land at Moor Lane, Woodthorpe (2016 submitted boundary). Strongly object to the exclusion of this site as an allocation in the plan. Potential to incorporate 1250 homes, employment opportunities and social infrastructure. It is considered that this site is suitable, viable and deliverable with technically robust supporting evidence. Concerns previously raised by officers are now considered to be resolved. It is considered that hydrology concerns are overstated by the Council and that the Water Management Strategy produced including hydraulic modelling, satisfies mitigation required and that this is agreed in principle with Natural England. Although there is a degree of hydraulic connectivity between the site and Aksham Bogg, it is considered that technical and engineering solutions are available to potential mitigate impacts. Evidence stated from the Wildfowl and Wetlands Trust (consulting) Ltd consider that careful design, management and operation could offer potential benefits to the Bogg by enhancing the hydrological conditions and opportunities for management. Landscaping issues are considered flawed as the site is contained by strong physical boundaries and relates to existing surrounding development. Evidence base attached includes hydrological investigations, highways assessment, ecological assessments, aquatic environment assessments, landscape and visual impact appraisals, archaeological investigations and solids assessment.

Proposed site boundary

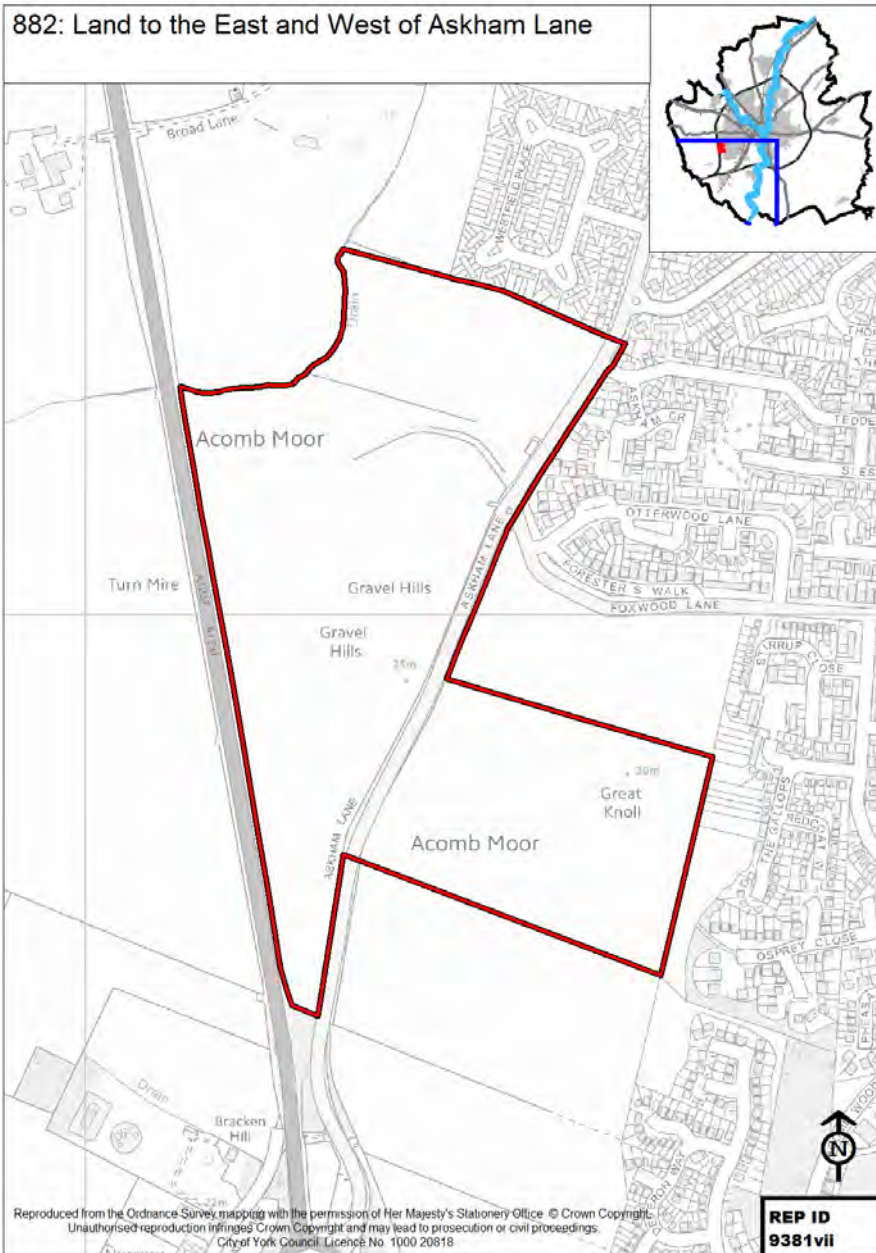


Site 882 - Land to the East and West of Askham Lane

Summary of site submission

Ashkam Lane, Acomb and land south of Foxwood Lane. Object to the sites omission as a housing allocation in the Local Plan. Evidence base undertaken for the site remains valid (previously submitted) and includes archaeology, transport landscape and visual impact reports as well as a masterplan. The potential quantum is estimated on 30 dph. Site size is 17.89 ha for 537 dwellings. Considered that no constraints to preclude development and that the site is sustainable. The site is physically and visually well connected to the main urban area. The site should be allocated to provide sufficient housing land to accommodate growth.

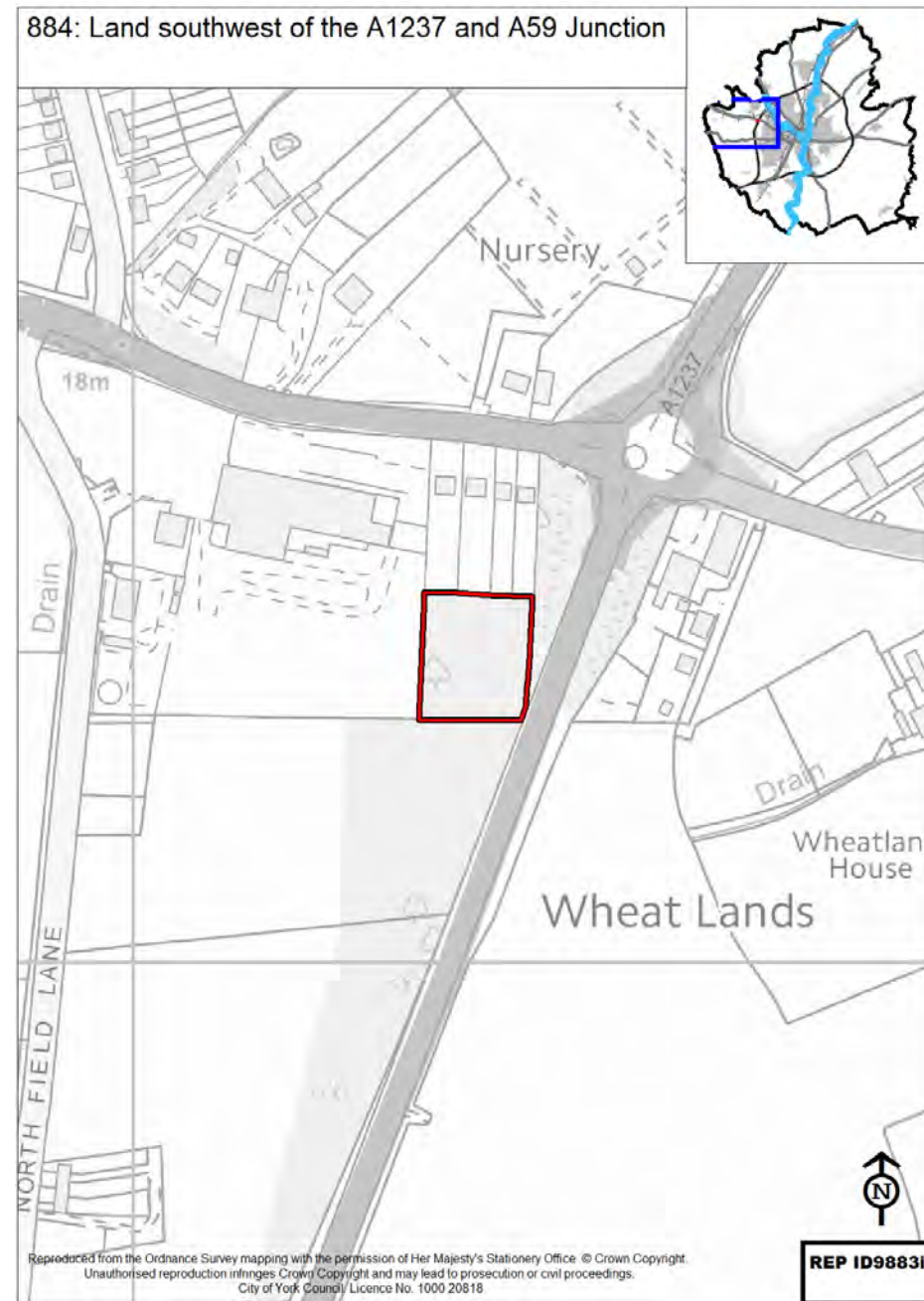
Proposed site boundary



**Site 884 (no former allocation) Land southwest of the A1237 and A59 Junction
Summary of site submission**

Land southwest of the A1237 and A59 junction, Upper Poppleton. 0.43ha. Land should be allocated for housing. The green belt boundaries are not defensible and the site does not fulfil green belt purposes. Safeguarded land should be provided for development beyond the plan period. The proposed site is in a sustainable location. Technical documents: Representation contains detailed calculations re the housing requirement in York, a 5-year land supply assessment and a housing trajectory at appendix 2 to support the need for this site as housing. An Ecology Report is attached at Appendix 3.

Proposed site boundary



Site 885 (no former allocation) Land East of Northfield Lane Minster Equine Veterinary Clinic

Summary of site submission

Site ref 885. Land East of Northfield Lane Minster Vets, Poppleton. 0.35ha. Land should be allocated for housing and could accommodate 10 dwellings. Land does not fulfil green belt functions. The existing tenants can be accommodated in alternative premises or land owned by SBO Lands Ltd. The proposed site is viable, deliverable and sustainable. Technical documents: Representation contains detailed calculations re the housing requirement in York, a 5-year land supply assessment and a housing trajectory at appendix 2 to support the need for this site as housing.

Proposed site boundary

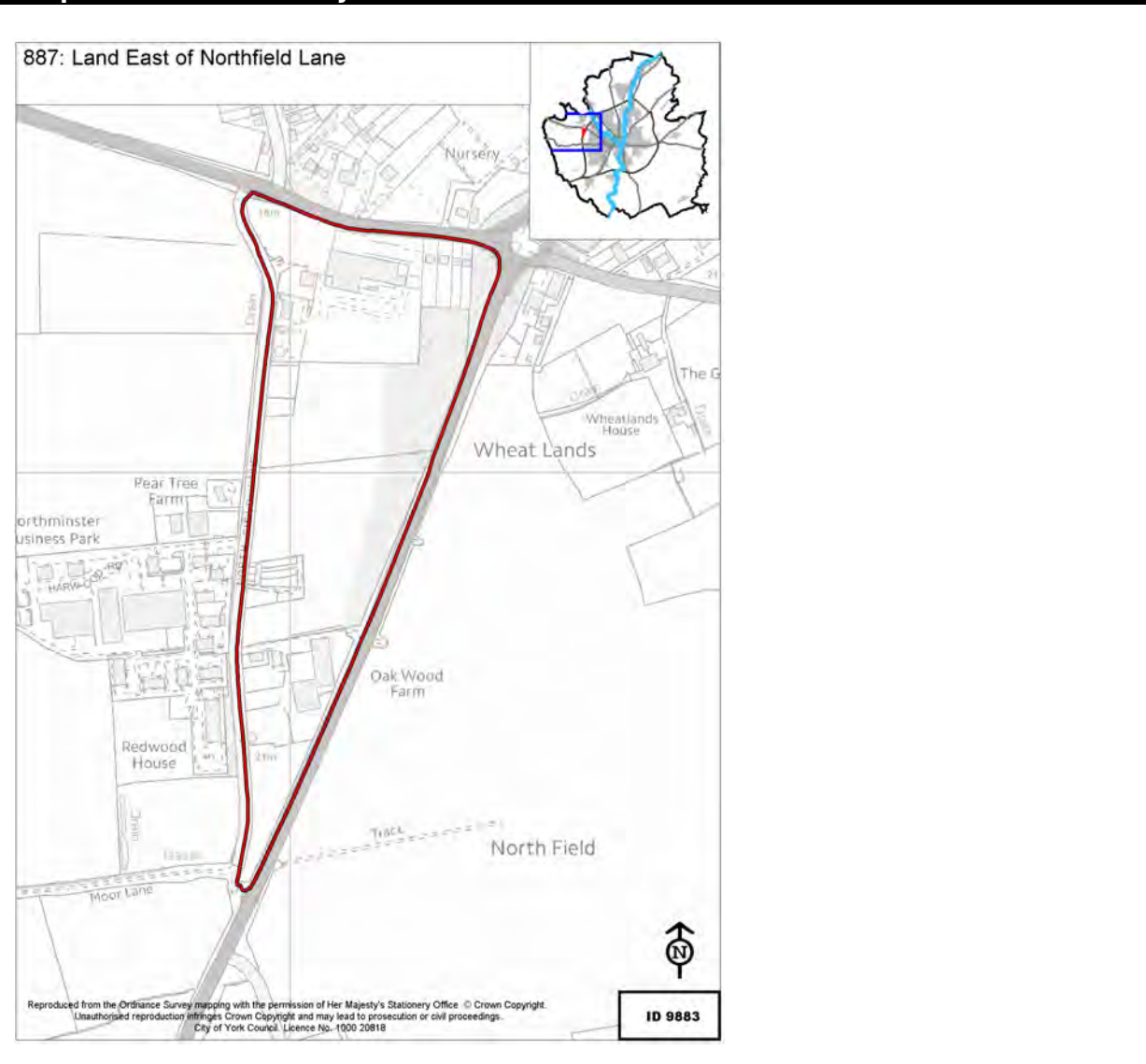


Site 887 (no former allocation) Land lying between Northfield Lane, A59 and A1237

Summary of site submission

Site ref 887. Land lying between Northfield Lane, A59 and A1237. 14.4ha. The site does not fulfil Green Belt Functions and should be excluded from the Green Belt. The site is neither open nor in the countryside, given the current level of development on the site and surrounding areas. The site is in a highly sustainable location very close to bus and rail facilities as well as amenities and services. The site should be considered as a development site. Technical documents: Ecology Report. Promotes residential development, local convenience store and proposed country parkland. Approx 320 dwellings. Sustainable location near park and ride. The land is undesignated 'white land' in the Upper and Nether Neighbourhood Plan and was previously allocated for employment in the 2005 draft local plan. Site plan included with development summary stating: gross area as 27.13 ha, net area for residential as 10.61 ha, area for convenience store 0.07 ha, area for country park as 6.20 ha, dwellings achievable as 320.

Proposed site boundary



Site 890 (no former allocation) Luigi's Restaurant, Northfield Lane, Summary of site submission

Site 890. Luigi's Restaurant, Northfield Lane, Poppleton. 0.21ha (5 or 6 houses). Should be allocated for residential or employment development. Close proximity to park and ride, York ring road and Poppleton Railway Station. Site is brownfield and does not fulfil any purposes of the green belt. Representation includes assessment of housing need and requirements as well as analysis of proposed housing allocations. Attached: Location Plan.

Proposed site boundary



Site 896 (former H35) Land at Intake Lane Dunnington Summary of site submission

Linden Homes object to the removal as a housing allocation. Site size 1.59 ha and relatively flat in nature. Concerns raised by officers in July 2017 regarding access and the potential for the site to be landlocked is acknowledged. Given that H31 and H35 are physically linked they could be considered as one allocation. Developers would work together to bring forward both allocations, which should be acceptable in line with other allocations in the plan. Clear that H31 will be developed which aids site delivery. Access to the site is included in the H31 layout. Landlocked development is therefore not a constraint to delivery. Also although the access will be long, no technical reason why this would not be acceptable. Request the site is reinstated with a time frame of 1-10 years to reflect that H31 should be built in the short-term first. Evidence base attached includes site plan, site allocation density information and a technical report on housing issues by consultants Lichfields.

Proposed site boundary

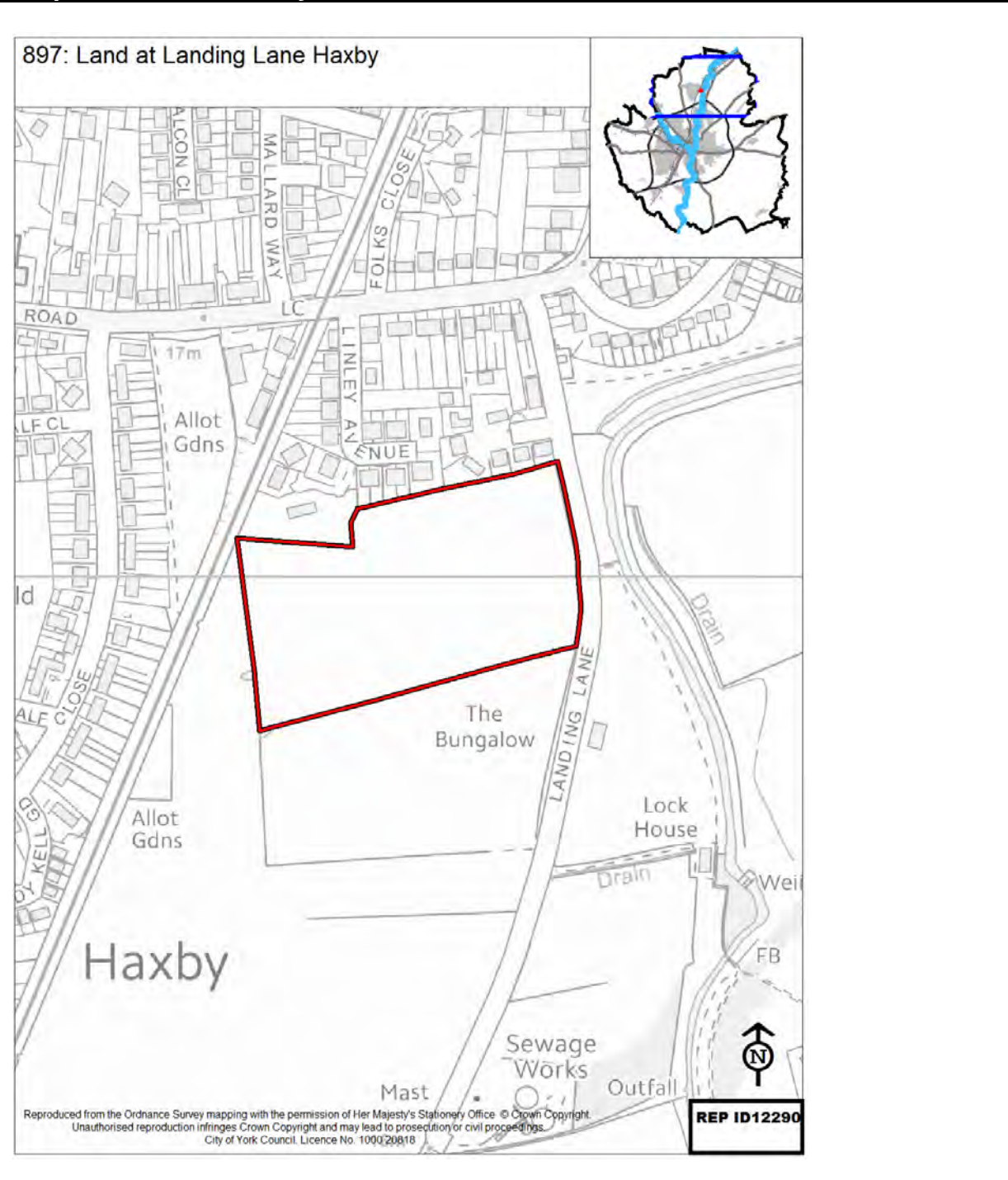


Site 897 (no former allocation) Land at Landing Lane Haxby

Summary of site submission

Site 897. Land West of Landing Lane, Haxby (3.1ha) should be allocated for housing (C3) or care home (C2). The site could also include parking for the proposed Haxby Railway Station. Site is available within the first 5 years of the Plan period. Site is in sustainable location. The green belt boundaries are not defensible. Representation includes assessment of housing need and requirements as well as analysis of proposed housing allocations. Attached: Location Plan.

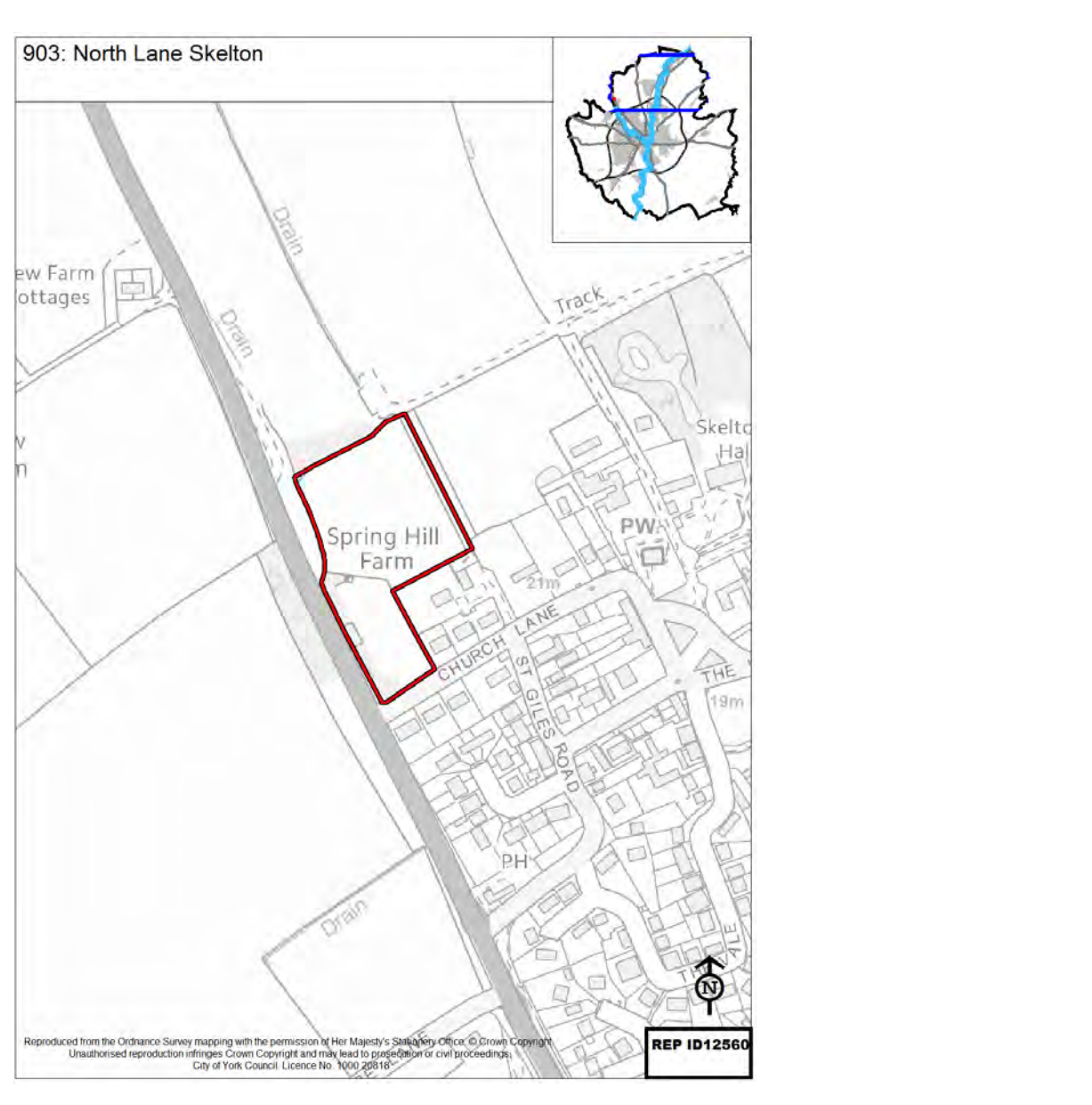
Proposed site boundary



Site 903 (formerly H34) Church Lane, Skelton
Summary of site submission

Landowner objects to removal of this site as an allocation. Site size 1.74 ha. It is considered that the site is contained and is suitable, deliverable and viable for development. In agreement with the Council's 42 dwellings and can be delivered in years 1-10. Previous concerns raised in relation to the site are addressed: transport access and impacts on the Skelton conservation area. A transport assessment (attached) shows that access to the site is not a showstopper as it can be accommodated using a single access to the site and the existing highway can accommodate the uplift in traffic. Further evidence (attached) seeks to demonstrate that widening of the access and development would not harm the conservation area. Neither issues remain showstoppers and therefore the site should be allocated for residential development as the foundation for the site's deletion are without foundation; de-allocation is unsound and unjustified. The site does not perform green belt purposes.

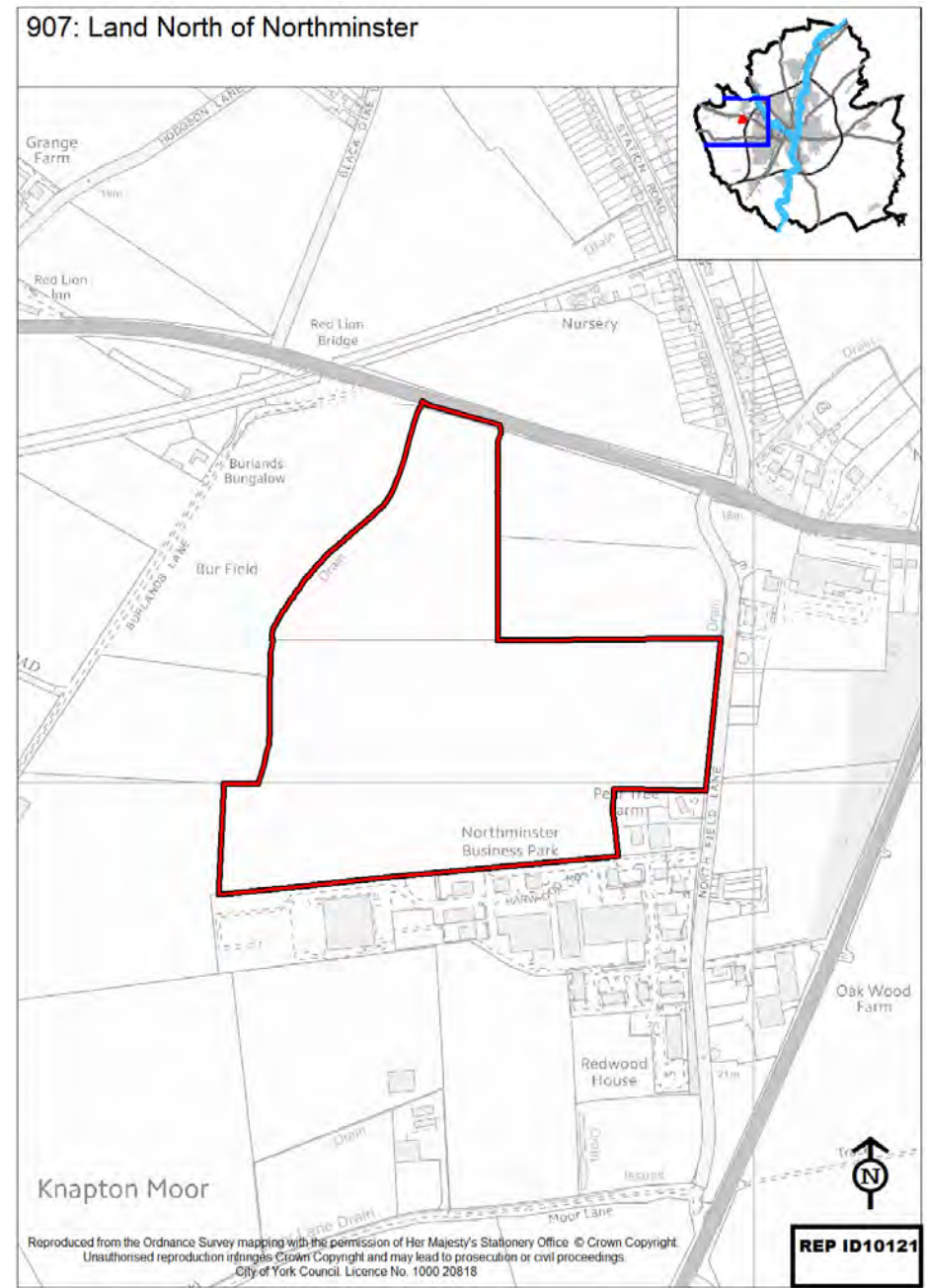
Proposed site boundary



**Site 907 (no former allocation) Land North of Northminster
Summary of site submission**

Land north of Northminster Business Park, south of the A59, Poppleton. Promotes residential development, local convenience store and proposed country parkland. Approx 320 dwellings. Sustainable location near park and ride. The land is undesignated 'white land' in the Upper and Nether Neighbourhood Plan and was previously allocated for employment in the 2005 draft local plan. Site plan included with development summary stating: gross area as 27.13 ha, net area for residential as 10.61 ha, area for convenience store 0.07 ha, area for country park as 6.20 ha, dwellings achievable as 320.

Proposed site boundary



Site 926 (H28) Land North of North Lane, Wheldrake Summary of site submission

Both Linden Homes and Pilcher Homes object to the sites omission as a housing allocation in the Local Plan. Linden Homes resubmit boundary 926. The site size is 3.15ha of relatively flat land. The site is suitable, deliverable and viable and has a willing developer. There are not considered to be any technical constraints to preclude delivery now that access had been clarified. Evidence base undertaken to support the site remains valid including a topographical and archaeological surveys, geo-environmental appraisals, flood risk and drainage, air quality impact assessment, transport assessment and ecological assessments. Support the officers' recommendation in July 2017 that the site could be reinstated for a housing allocation. Does not perform Green Belt function and therefore should be excluded from the Green Belt and included within the settlement of Wheldrake. Evidence base attached includes site plan, site allocation density information and a technical report on housing issues by consultants Lichfields. Pilcher Homes also confirm that H28 should be included as sustainable and technically deliverable. Revised access meets technical officer comments for exclusion. No issues with drainage. And submit and updated boundary (926)

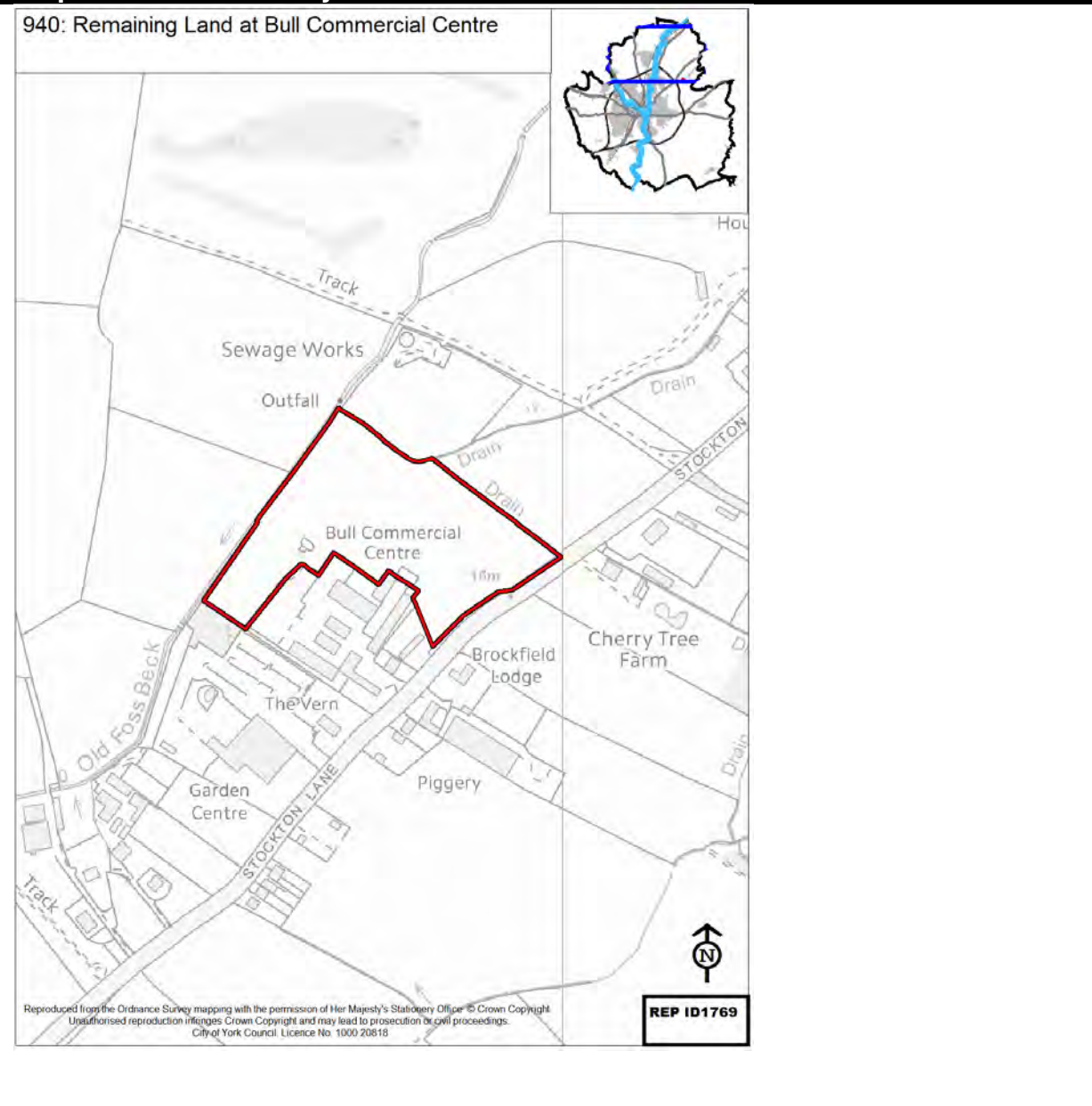
Proposed site boundary



**Site 940 (no former allocation) Remaining Land at Bull Commercial Centre
Summary of site submission**

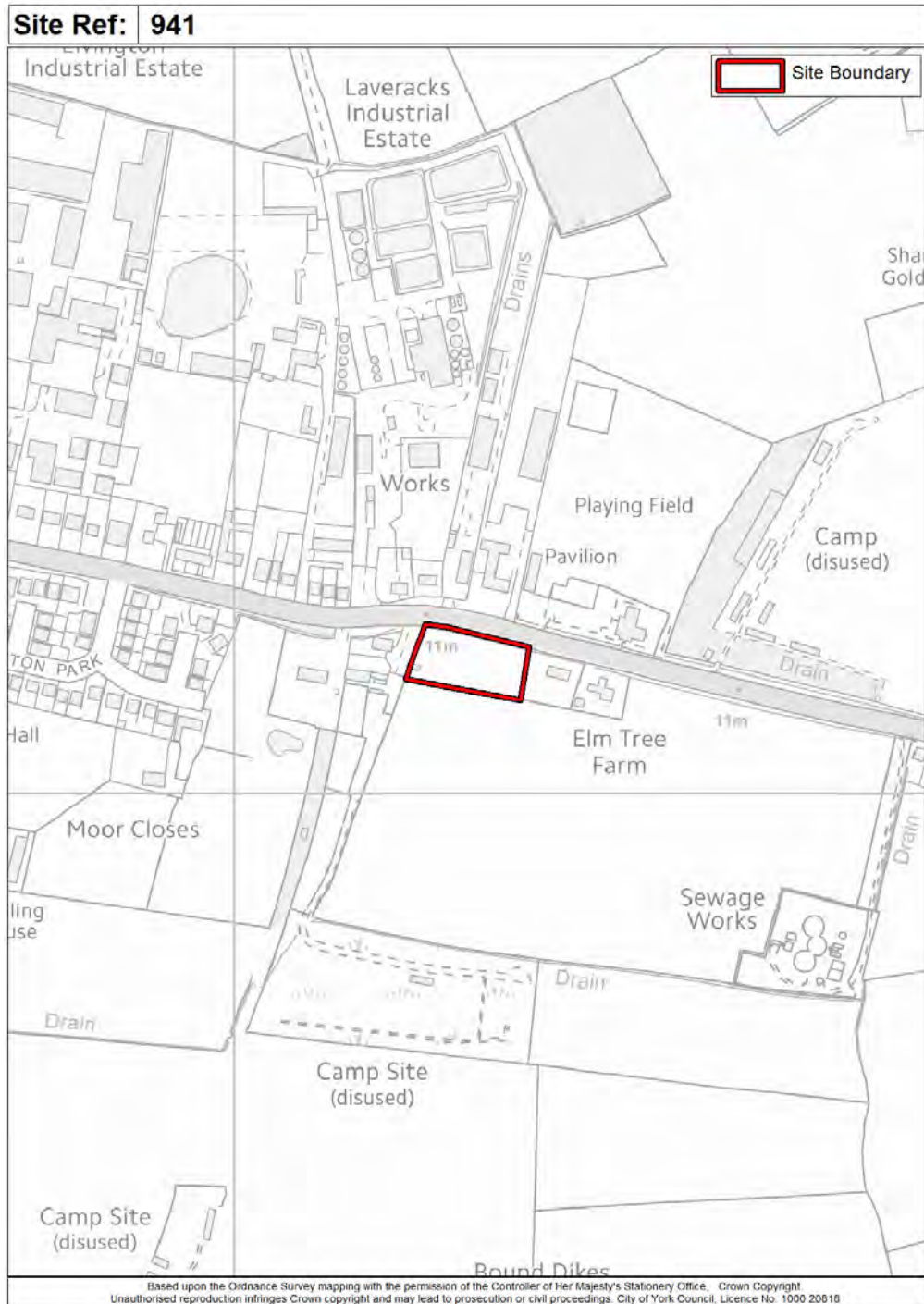
Objects to land adjacent to the Bull Commercial Centre, Stockton Lane, York YO32 9LE not being included for employment use, and that the new plan has no new land for smaller light industrial units, which is in short supply. Employment use in plan is predominantly for office development. The Centre has been permanently let, with several businesses wanting to take this unit - this illustrates the demand. A business was forced to relocate when it grew to Ryedale. Suggests an extension of the centre into land previously in horticultural use, with 2x6m wide access roads and area for parking. It is well screened with trees. Extends to clear boundaries bordered by sewage treatment works and a garden centre. Better alternative to developing in green belt. Centre has a record for job creation and business growth.

Proposed site boundary



**Site 941 (no former allocation) Land West of Elm Tree Farm Elvington
Summary of site submission**

Proposed site boundary

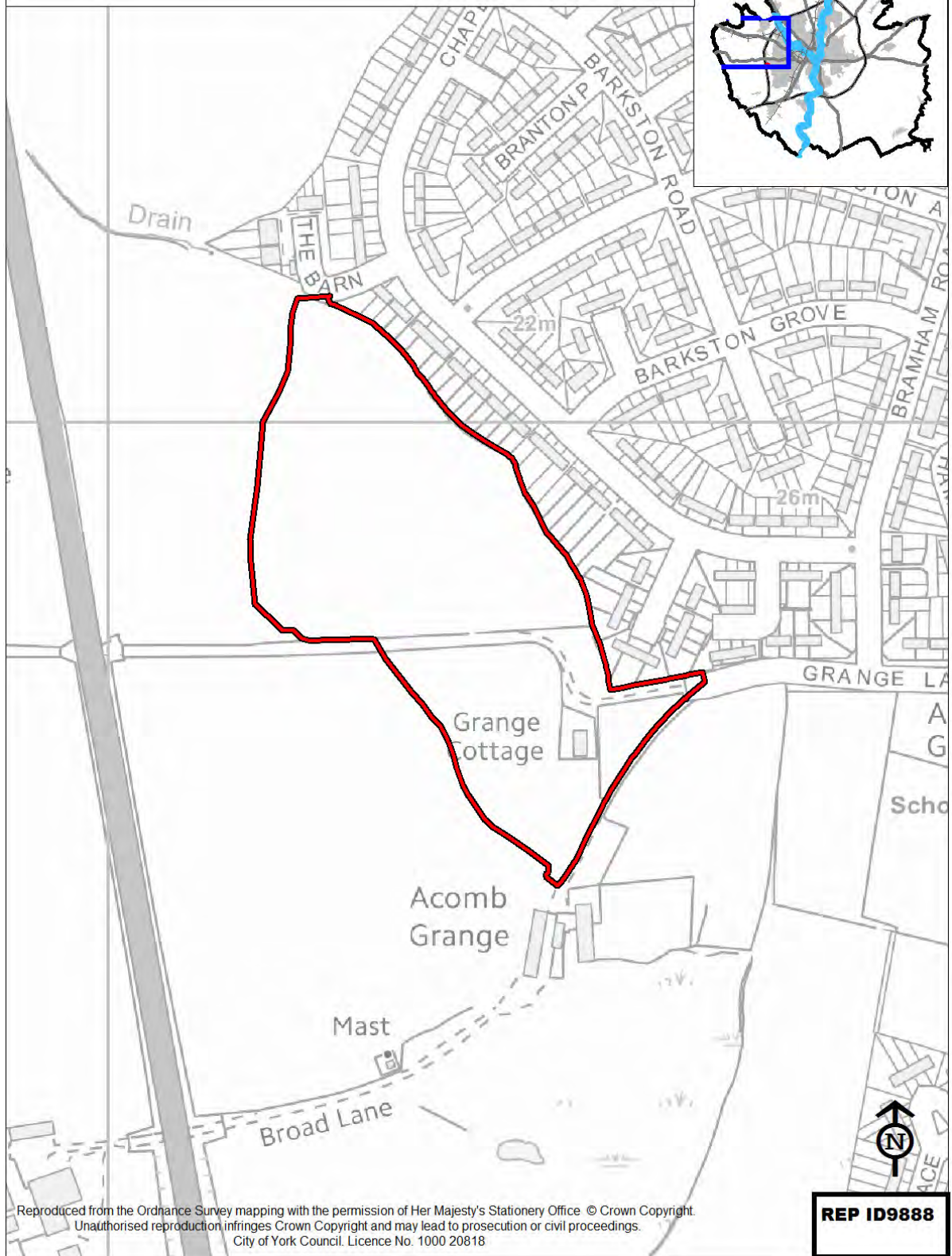


**Site 942 (no former allocation) Land at Chapel fields York Duplicate
Summary of site submission**

Promoting the site Land West of Chapelfields, can accommodate 90 dwellings and would be an urban extension of the existing Chapelfields settlement. The case for this site at Chapelfields has been made in previous iterations of the Local Plan. In 2013 the promoters sought pre-application advice on the understanding the site sat out of the Draft Green Belt. Extensive technical studies have been undertaken regarding the suitability of the site, these include:- Landscape Assessment; Geotechnical assessment; Transport Assessment; Flood Risk and Drainage; Cultural Heritage assessment. All the above studies individually concluded the site to carries no overriding technical constraint and cumulatively confirm the site would represent sustainable development. Over recent years our client has worked very closely with the Rufforth and Knapton Neighbourhood Plan and has reached a stage with them where there is agreement between the parties that the Neighbourhood Plan Team agree that if Green Belt release is required within the Parish to meet York's housing target then this site is their preferred option. Goes on to detail access; flood risk; cultural heritage; ecology; residential amenity and social infrastructure, none of which are barriers to development. This Local Plan provides the Council with an opportunity to consider all draft Green Belt and non draft Green Belt areas afresh. It is our opinion this site at Chapelfields would never have formed part of the original draft York Green Belt given the inner boundaries were never fixed. 3.8 Having regard to paragraph 80 of the Framework, the site performs none of the five purposes of Green Belt:- 1) The site does not promote urban sprawl given it appears as a logical 'rounding off' of the urban form. 2) The site does not create a threat to merging neighbouring towns. 3) The site does not represent an encroachment into the countryside given the Outer Ring Road represents the point for more open countryside. 4) The site has not been kept open in order to preserve any historic setting. 5) Not developing the site would not otherwise result in urban regeneration. It is clear that the draft Green Belt Boundaries of York will need to be altered and it is considered that the site at Chapelfields would be a suitable site to allocate for housing. The development of this site would provide a logical urban extension to the existing settlement of Chapelfields. Chapelfields Promotional Brochure, Transport Corridors Plan and Landscape Text and Plan are all attached as appendices.

Proposed site boundary

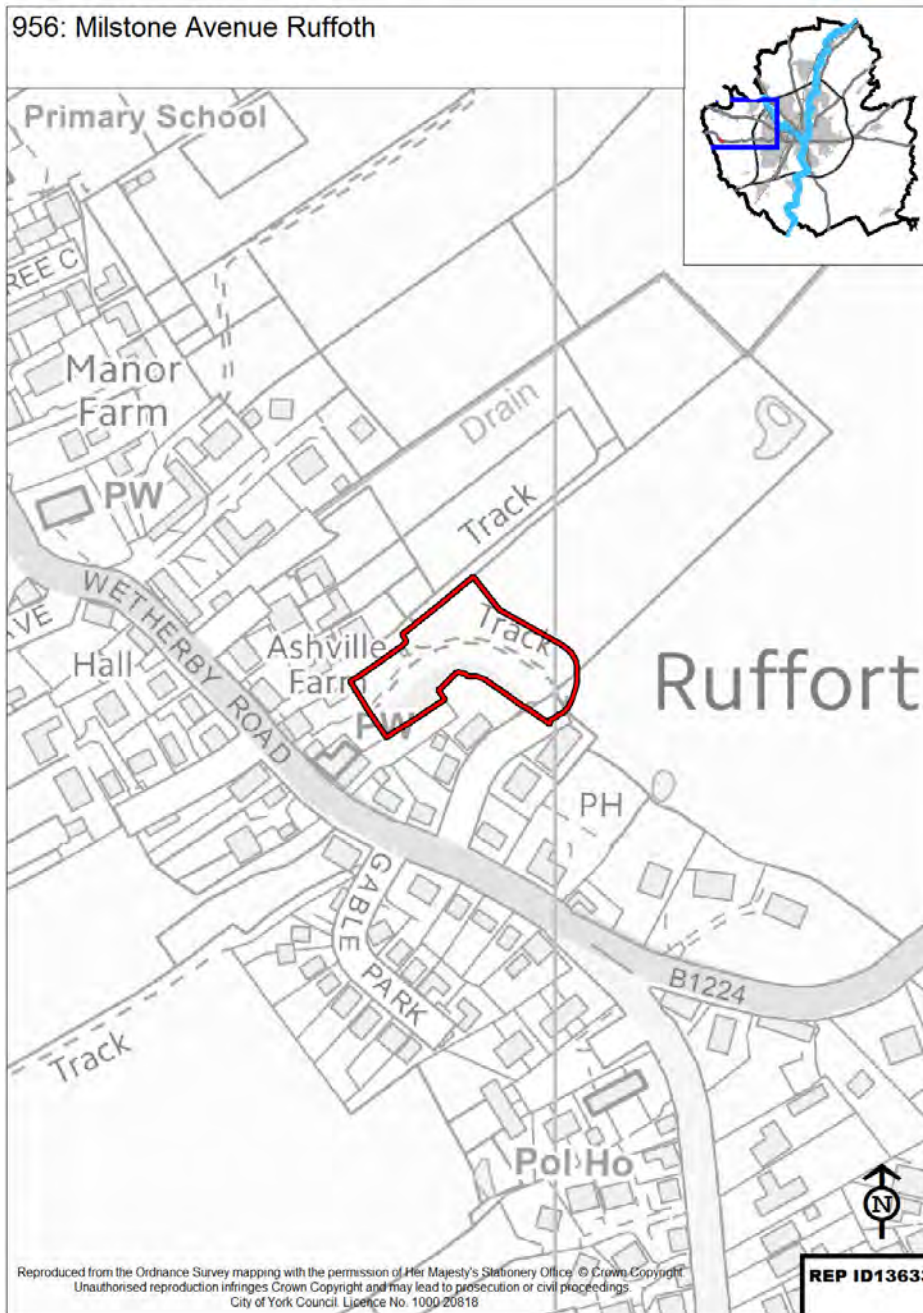
942: Land at Chapelfields York



Site 956 (no former allocation) Milestone Avenue Ruffoth
Summary of site submission

A New Site is submitted at the end of Milestone Avenue, Ruffoth. 0.37 ha with capacity for 9 dwellings. Site is supported in the Ruffoth with Knapton Neighbourhood Plan (site ref RK H2). The site is suitable and deliverable. This is demonstrated by various assessments that have been undertaken: flood risk and drainage strategy, noise assessment, assessment of vehicular access arrangements. Land has been provided to Rwk Parish Council to enable the creation of a cycle path to connect the path from Ruffoth village to Harewood Whin cycle path and Knapton village. The land does not serve Green Belt purposes- it is enclosed by development on three sides and 'rounds' off the settlement.

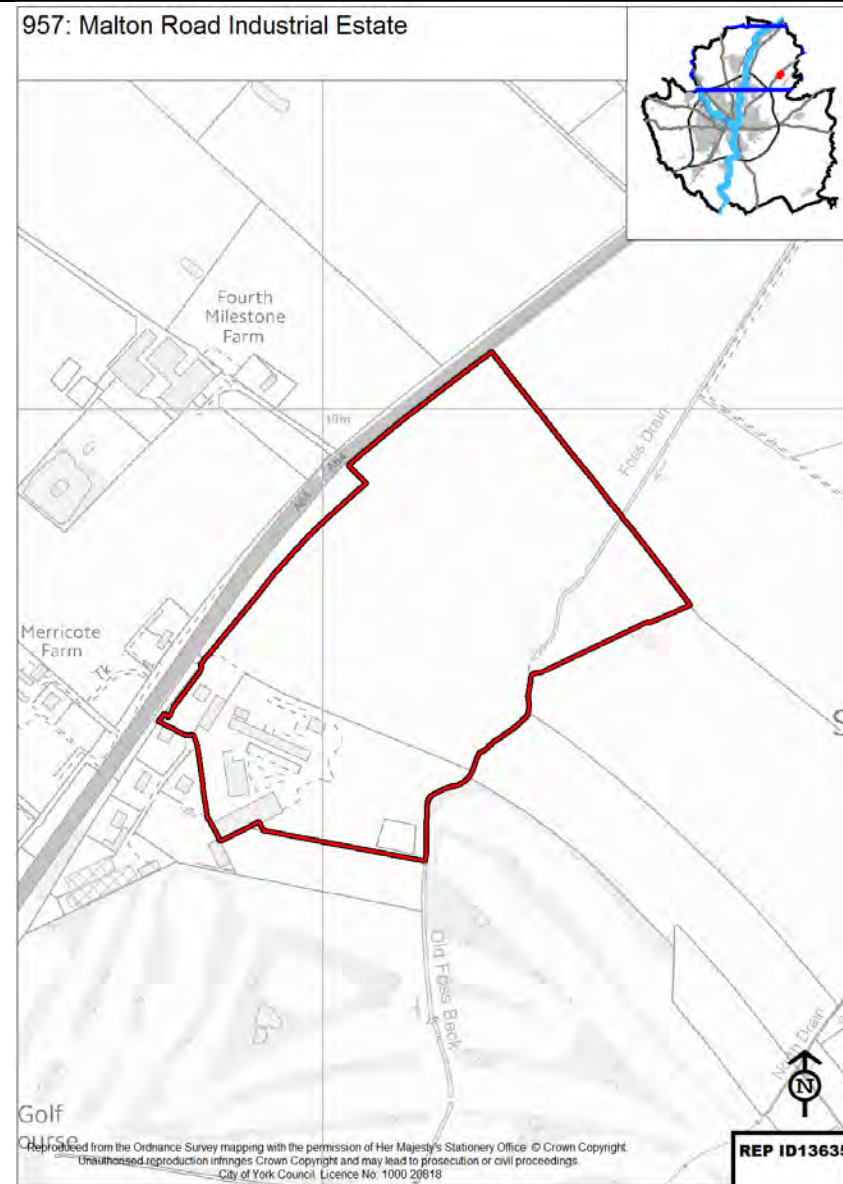
Proposed site boundary



Site 957 (no former allocation) Malton Road Business Park
Summary of site submission

Representation for allocating Malton Road Business park and land to the north east of the Business Park for employment use. The total developed and undeveloped site comprises 14.66 hectares. The site is not subject to any statutory nature conservation, landscape or other designations and should be allocated for employment use in the Plan. The allocation of the site will assist in meeting identified requirement for sustainable employment development. The allocation of the site will enable the Council to define Green Belt boundaries that will endure beyond the plan period and therefore check the unrestricted sprawl of the larger urban area. The site does not perform an important role in preventing neighbouring town merging into one another. The allocation of the site will enable the Council to define Green Belt boundaries that will endure beyond the plan period and therefore safeguard the countryside from encroachment. The site is not identified as being important to the setting or special character of the City.

Proposed site boundary



Site 958 (no former allocation) Black Dyke Upper Poppleton

Summary of site submission

Previously considered SHLAA/SA site 763.

• General address: Land at Black Dike Lane, Upper Poppleton • Site size: 5.35ha (3.9ha net developable area) • Preferred use: Residential • No of dwellings: 117-137 dwellings • Suggested delivery and phasing of development: Planning Application Summer 2019, Start on Site early 2020 first dwelling completed Summer 2020 with a density of between 30-35dph at 30 dw per annum. • Technical documents: Landscape Context Appraisal by Surface Property (Appendix 2), Indicative Concept Sketch Layout by Sten Architecture (Appendix 3) • Summary of technical evidence submitted. The Landscape Context Appraisal by Surface Property shows the impact of the proposed development on the locality by means of a Landscape Constraints Plan and indicates that the best potential for development is the area which is formed by the boundaries of the site which is the basis of the submission. The development of the site could be developed whilst preserving the setting and special character of York as the primary purpose of the Green Belt. The site is located in Flood Zone 1. The foul sewerage would be connected to the local mains sewer with surface water directed to soakaways. Access to the site would be taken from Black Dike Lane on the northern boundary of the site. A full Traffic Impact Assessment report would be provided in due course. The site is not of particular environmental or amenity value or protected for nature conservation. In comparison with other sites on the edge of the village of Poppleton it is not identified as an 'Area Preventing Coalescence' and it is not part of a green corridor or green infrastructure. The site is currently identified as Green Belt but it does not contribute to the main purposes of the Green Belt around York which is to preserve the setting and character of the historic town or prevent coalescence. As such the Council's housing land and Green Belt Strategies are considered flawed by failing to identify opportunities for continued growth at sustainable settlements, such as Poppleton around York.

Proposed site boundary

958: Land at Black Dyke Upper Poppleton

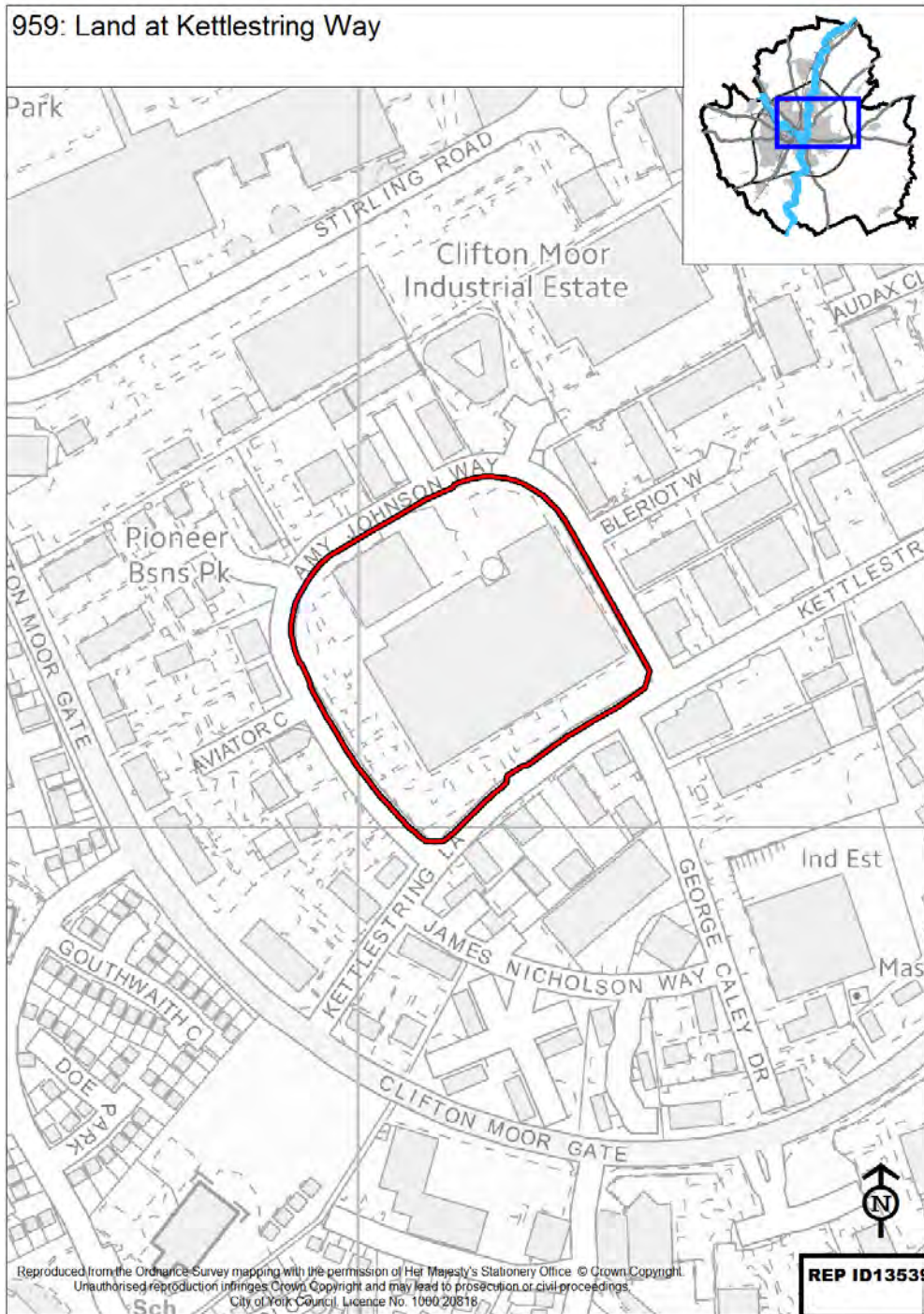


Site 959 (no former allocation) Land at Kettlestring Way

Summary of site submission

Site at Kettlestring Lane/Amy Johnson Way, Clifton Moor Industrial Estate, York, YO30 4XF. 3.20ha. Should allocate for housing. Existing commercial premises under-utilised and will become vacant in the near future. Good access to facilities at Clifton Moor and access to A1237 via roundabout. Indicative plan attached shows 90 townhouses and 40 apartments.

Proposed site boundary



Site 960 - Land North of Harewood Close Wigginton

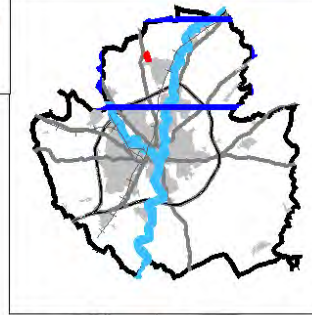
Summary of site submission

General address: Land to the north of Harewood Close, Windsor Drive, Wigginton, York, YO32 2QH. Grid Reference: 459607, 458976. The site is located to the east of Wigginton Road, Sutton Road and Wigginton Playing Fields. The site lies to the north of Windsor Drive and Harewood Drive which are located immediately south, abutting the site providing the proposed access into the land.

- Site size: 27 acres (11ha)
- Preferred use: Residential
- No of dwellings: 350 + dwellings at a density of 30 dwellings per hectare.
- Suggested delivery and phasing of development: The site is available immediately and can come forward within the period 0-5 years.
- Technical documents – Green Belt Assessment
- Summary of technical evidence submitted - Information on the five purposes of the Green Belt given. It is not considered that the inclusion of this site would lead to unrestricted sprawl given the nearby defensible boundaries, in which it is situated. The site would not lead to the physical connection or coalescence of any settlement. The land could be designed so as not to encroach into the countryside. The site is within an extended green wedge. There is an acceptance in York that there will need to be a release for Green Belt sites to the OAHN.

Proposed site boundary

960: Land to the North of Harewood Close Wigginton



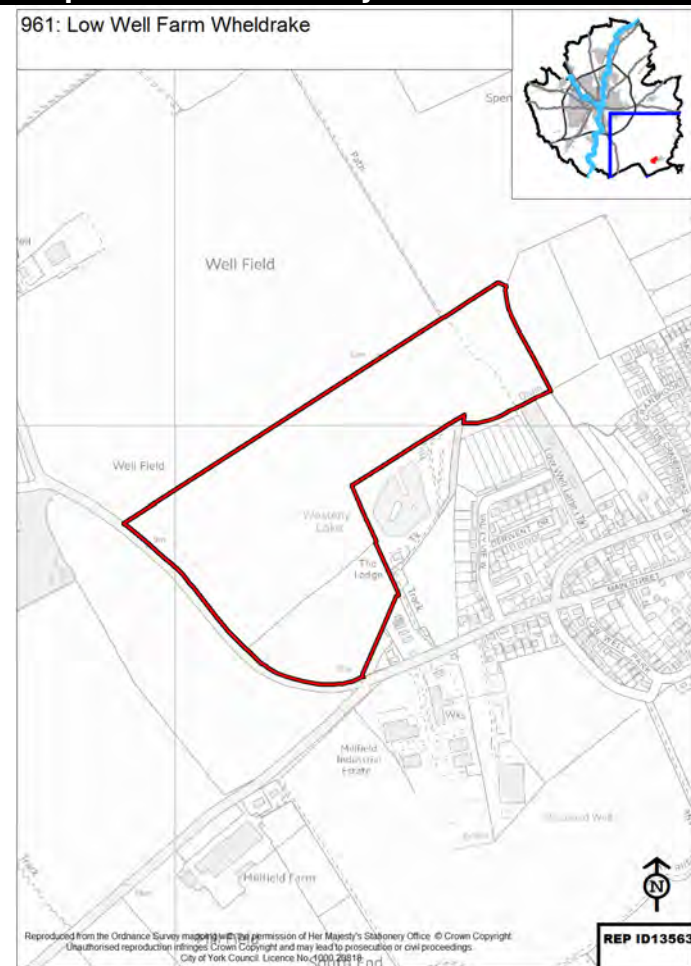
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Site 961 - Low Well Farm Wheldrake

Summary of site submission

- General address: Land to the east of Wheldrake Lane, Wheldrake, York, YO19 6NA. Grid Reference 467128, 444863
- Site size: 42 acres (17ha)
- Preferred use: Residential
- No of dwellings: 500+ dwellings at a density of 30 dwellings per hectare
- Suggested delivery and phasing of development: The site is available immediately and can come forward within the period 0-5 years.
- Technical documents: Green Belt Assessment
- Summary of technical evidence submitted: Information on the five purposes of the Green Belt given. It is not considered that the inclusion of this site would lead to unrestricted sprawl given the strong defensible boundaries which would ensure growth within this location can be restricted. The site would not lead to the physical connection or coalescence of any settlement. The land could be designed so as not to encroach into the countryside. Development could be designed to protect the historic core of the village. There is an acceptance in York that there will need to be a release for Green Belt sites to the OAHN.

Proposed site boundary

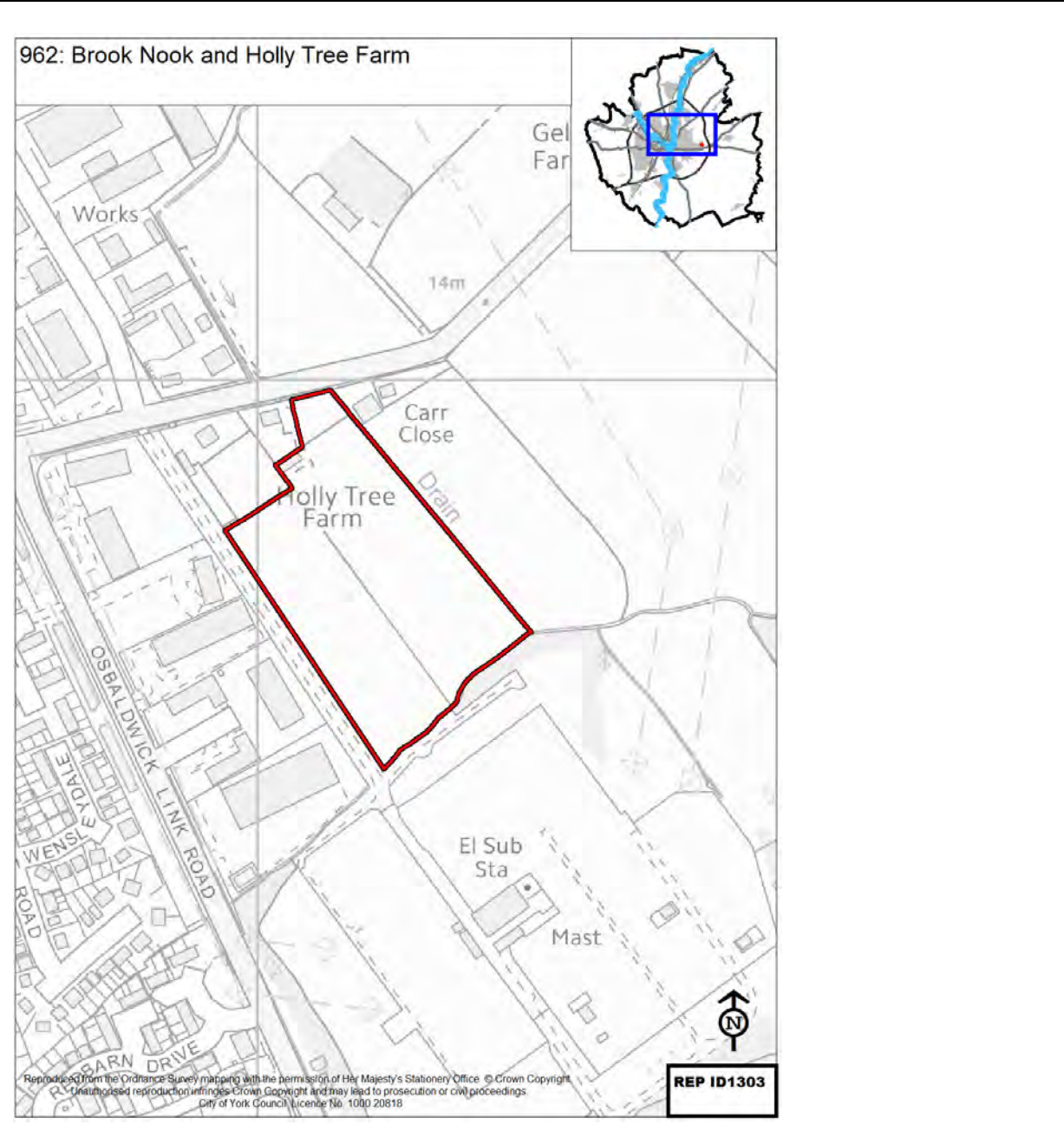


Site 962 - Brook Nook and Holly Tree Farm

Summary of site submission

New site submission. Land at Brook Nook and Holly Tree Farm for residential development. Proposed capacity is 78 dwellings of which 35% could be affordable. Has willing landowners. Flood report supplied previously which is relevant to this submission.

Proposed site boundary



Site 963 - Brook Nook

Summary of site submission

Land at Brook Nook, Osbaldwick. 3.13 acre site proposed for residential use with 25% affordable housing. Proposed approx 38 houses or care/respice home or commercial units for immediate start subject to planning. Consider the site to be secluded and all services are available. Comparison in site made to Beckett Drive, Murton Way. Location plan and sites photos submitted.

Proposed site boundary



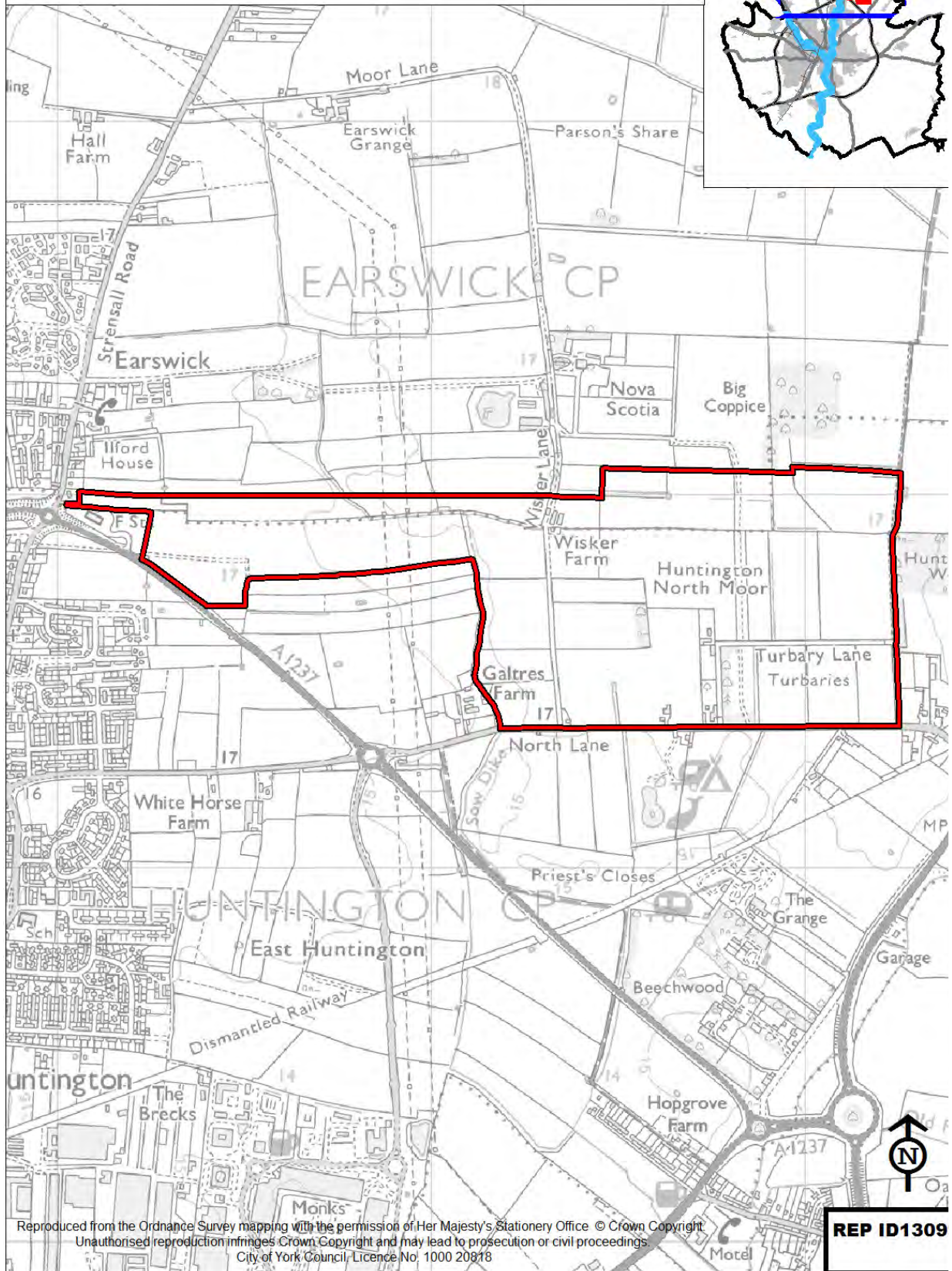
Site 964 - Galtres Garden Village

Summary of site submission

Galtres Village Development Company object to the rejection of their previously submitted boundaries and propose a revised boundary of 77.37 ha for 1753 dwellings of which 1403 would be market and affordable dwellings, 286 for retirement dwellings and a 64 bed care-home (4117 residents in total) as well as 15.6 ha new country park and 3.49 ha for community facilities, including a primary school. Indicative site density would be 32 dph. The revised boundary reflects consideration of officer's previous comments on the site; the boundary has been pushed back setting the development away from the ring-road (similarly to other allocated sites) with improved access off North Lane to be a standalone site. Site is landscape-led to and responds to location and evidence base undertaken. Able to deliver 30% affordable housing on site in an innovative way and would support self and custom house building. With financial support from HCA and Council there is also the ability to deliver affordable housing through accelerated delivery in the first 5 years. Consider that the site is suitable, deliverable and viable (using PBA Viability methodology). The site is predominantly a mixture of arable farmland, pasture and woodland. It is considered that the land does not meet green belt purposes. Evidence base underpinning the site submitted includes: Indicative masterplan, Transport Technical Note, Landscape Capacity Report, Ecology Report, Heritage Report, Flood Risk Assessment and Drainage statement, Phase 1 habitat report and Heritage Appraisal as well as a prospectus for delivery.

Proposed site boundary

964: Galtres Garden Village



Site 965 - Land South of Rufforth Airfield

Summary of site submission

Suggested site to include in plan approximately 1.5ha of land immediately to the south of Southfield close, Rufforth. Located on former Rufforth airfield. Rufforth village has good transport and services. Site is in proposed Green Belt and currently used for agriculture, and within the Vale of York National Landscape Classification Area. Accessible to York and well located site, borders Bradley Lane which leads to the B1224, near local bus stops. Is in Flood Zone 1 so low risk of flooding and no species of ecological importance or listed structures on site. Site has been previously assessed and failed despite only scoring red in landscape/design. No issues identified which could preclude development from site. There is also a need for housing as stated by the recent DCLG's consultation, and no defined boundaries for York's green belt. This site has been proposed to be included in the green belt. However, the site does not interfere with the 5 purposes of the green belt set out by the NPPF. It does not cause unrestricted sprawl of large built up areas as it is near the main residential area of Rufforth, and surrounded by green field and road infrastructure boundaries which would stop it from spreading. It does not provide a connection between neighbouring towns (nearest is 2 miles away to the south). The land could be designed so it does not encroach on the countryside, and is not interfering with the towns special character. Finally, the purpose of the green belt is to encourage development of brownfield sites - this site forms part of the former Rufforth Airfield. The site is a great location for housing development. Attached documents show map of site, size, and supporting evidence of floodrisk and habitat evidence (none), as well as the Technical Officer Assessment of the site.

Proposed site boundary

965: Land South of Rufforth Airfield



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**Site 966 (formerly SF14) - Land to the East of Strensall Road Earswick
Summary of site submission**

Land East of Strensall Road, Earswick (partly formerly designated as Safeguarded land). Development potential for 350 homes. This site should be a residential allocation or identified for safeguarded land. Considered that this site offers additional location for source of housing. There are exceptional circumstances to release the site from Green belt to meet housing need. Considered that this site does not meet Green Belt purposes. The site is considered to be suitable, deliverable and viable with not constraints to preclude development. Site development could commence immediately.

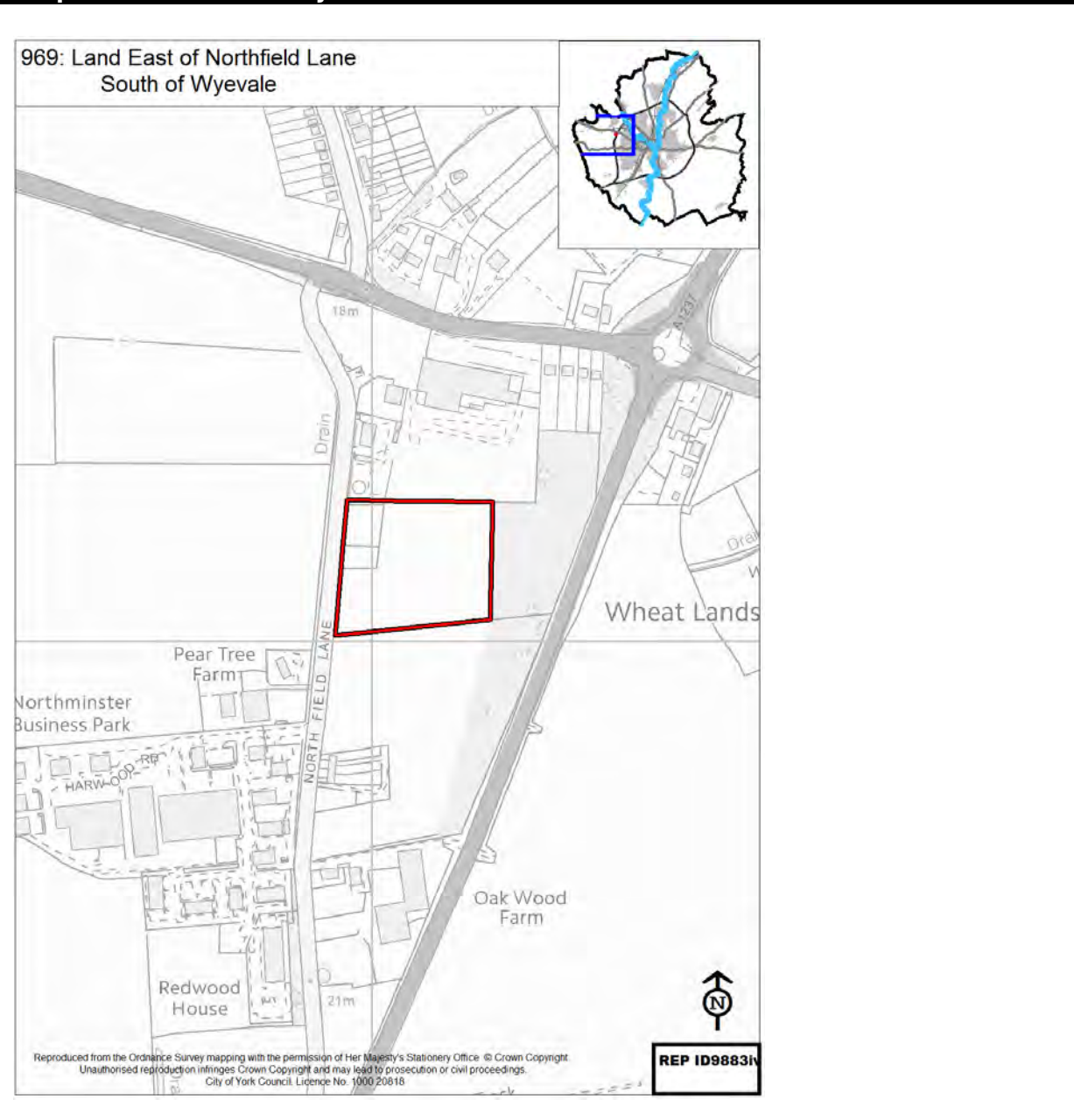
Proposed site boundary



**Site 969 - Land east of Northfield Lane and South of Wyevale Garden centre
Summary of site submission**

The Representation is for the allocation of housing or employment of approximately 4ha (10 acres) on Land east of Northfield Lane and South of Wyevale Garden centre. The site should be brought forward for allocation to assist in meeting these housing targets. The site performs none of the roles of the Green Belt as defined in the NPPF and there has been no proper justification in planning terms of including the site in the Green Belt. The site is in a highly sustainable location very close to bus and rail transport facilities as well as amenities and services. This is confirmed by the Council's analysis of the suitability of the adjacent garden centre for residential development. The housing allocations proposed in the Pre-Publication Draft document are wholly inadequate to meet the housing needs of the district. Without considerably more housing land the objectively assessed housing needs of the City will not be met and the Local Plan will be found unsound.

Proposed site boundary



Site 970 - Land at Princess Road North Strensall

Summary of site submission

Land at Princess Road, Strensall should be allocated for housing. This site and the southern part of the Southfields Road site were identified as Sites of Local Interest for nature conservation (SLI) though it was not clear why. Site does not serve green belt purposes. Well-located in terms of access to Strensall's services and facilities. The site is suitable, available and achievable and could be developed in the first 5 years. Site plan attached to rep.

Proposed site boundary



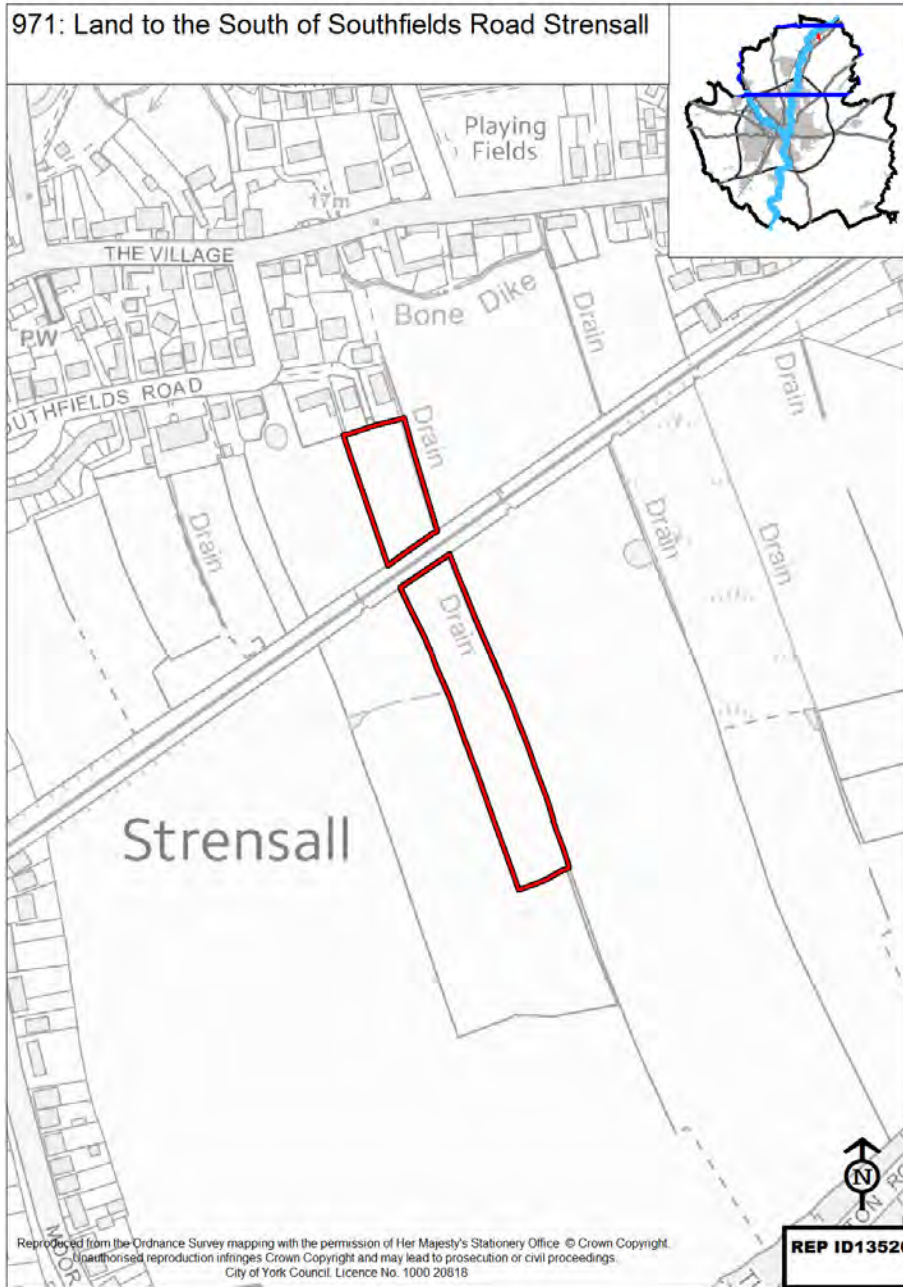
Site 971 (formerly H30) - Southfields, Strensall

Summary of site submission

Wakeford Properties confirm that site 971 (Formerly part of H30/SF1) is available in the short-term to help meet the housing requirements. The site is considered suitable available and deliverable. Part of the site is currently designated as an SLI which the respondent requests is removed. Do not consider that development would cause harm to the built or historic environment or Strensall Common SSSI. Access was primary reason for removal as an allocation and it is suggested that a solution to this can be found. Agreement is given to the Council's previous assessment that this site did not meet greenbelt purposes; considered that they form a logical expansion to the village and should be identified for allocations or safeguarded land.

Proposed site boundary

971: Land to the South of Southfields Road Strensall



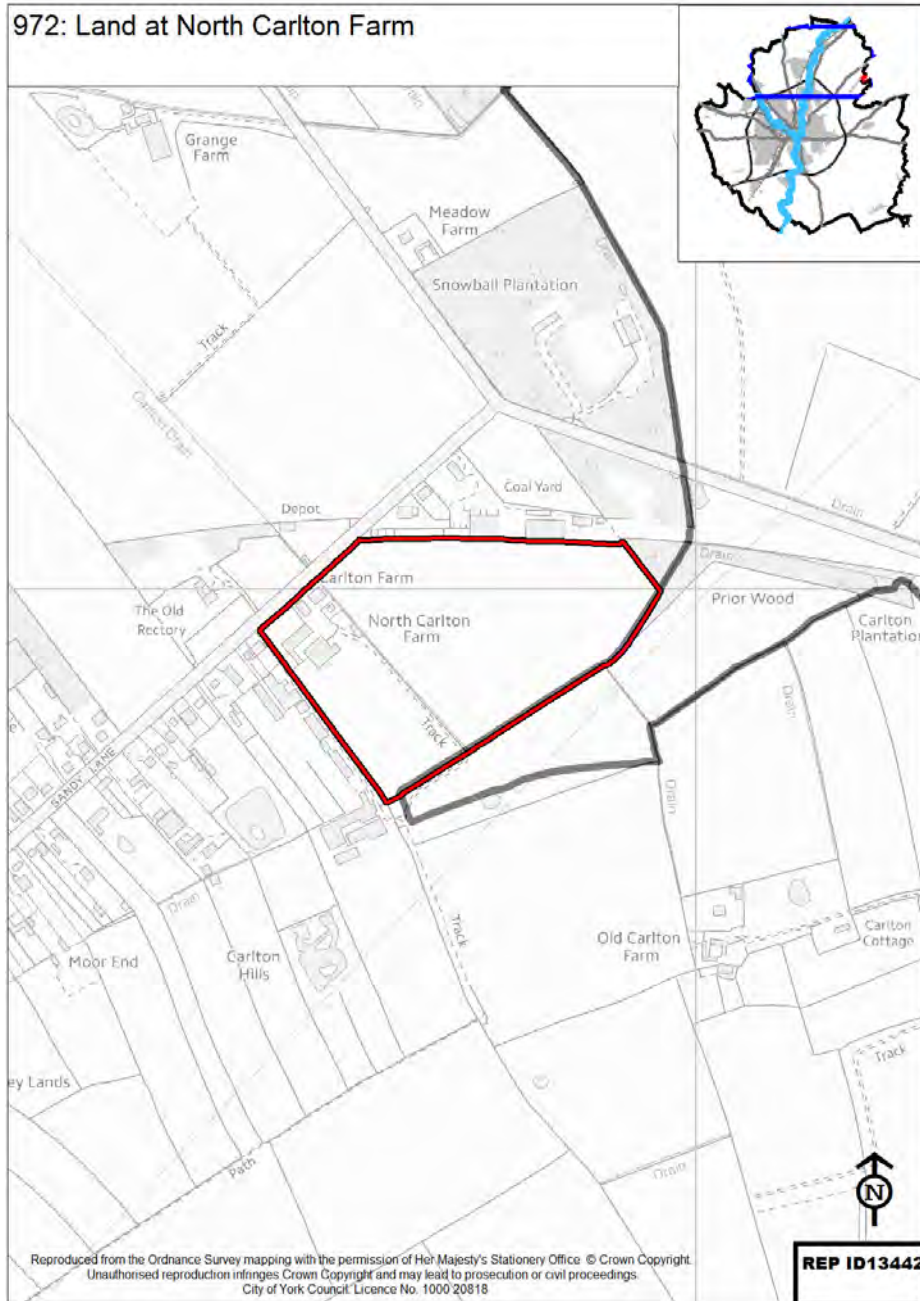
Site 972 - North Carlton Farm, Stockton-on-the-forest

Summary of site submission

New site submission. Land at North Carlton Farm, Stockton -on-the-forest. 9.93ha submitted for consideration for development. Available in short-term with willing landowner.

Proposed site boundary

972: Land at North Carlton Farm



Site 973 - Land off Mitchells Lane

Summary of site submission

Land off Mitchel's Lane, Fulford. Extends northwards towards Heslington comprises a natural sustainable urban extension to the settlement and should be supported.

Location plan submitted.

Proposed site boundary

973: Land Off Mitchells Lane



Site 982 Racecourse Greenhouses

Summary of site submission

New site: Racecourse Green houses, Middlethorpe Village. Proposed for residential use in the long-term. According to policy H2 the density would be 'rural area and village' and would support up to 35 dwellings per acre. Considered to be a sustainable location for future development.

Proposed site boundary



Sustainability Appraisal

Support	<p>Historic England broadly endorse the evaluation of the likely impact which the Policies and proposals of the Plan might have upon the historic environment however there are a few areas that require further work. Suggests that the Council undertake a comprehensive assessment of each site to ascertain what scale and density of development each can accommodate without harming the special character and setting of the City and what the implications would be if development was brought forward which did not conserve York's special character.</p> <p>Environment Agency comments that Development of brownfield land being assessed as positive is an appropriate assessment. Risks associated with land contamination will be assessed and remediated as part of the development of brownfield land can also be considered positive. The sustainability appraisal report demonstrating that Catchment Abstraction Management and water resources have been considered is supported.</p> <p>Yorkshire Wildlife Trust commented in support of the Habitat Regulation Assessment's overall screening conclusion that there are likely significant effects for policies SS19, E18, H59, SS18 and SS13.</p>
Objection	<p>While welcoming the spatial approach, limiting growth on the periphery of the City, Historic England suggest that the Council undertake a comprehensive assessment of each site to ascertain what scale and density of development each can accommodate without harming the special character and setting of the City and what the implications would be if development was brought forward which did not conserve York's special character.</p> <p>Historic England felt the impact of development of ST7 upon SOA14 should be amended to "serious harm" as it represents a large encroachment into the open countryside to the east of the City and also causes considerable harm to the views towards the eastern edge of the City from the ring road. This development will, in effect create a new free-standing settlement within the ring road under 160 metres from the edge of the existing built-up area. The Heritage Topic Paper Update identifies the relationship which York has to its surrounding settlements as being one of the elements which contribute to its special character and setting. This new settlement would appear out of keeping with the current pattern of development around York and harm this element of York's character.</p> <p>Historic England felt the impact of development of ST8 upon SOA14 should be amended to "serious harm" as it will substantially</p>

	<p>reduce the gap between the edge of the built-up area and the Ring Road and, as such, would adversely affect the rural setting of the city in this location. It would also start to enclose the western edge of the green wedge that is centred on Monk Stray and impact the open areas either side of Monk's Cross Link Road with the remnants of historic field patterns that contribute to the character of this area.</p> <p>Historic England felt the impact of development of ST14 upon SOA14 should be amended to "serious harm" as it will clearly affect the openness of the Green Belt, resulting in harm to elements which contribute to the special character and setting of the historic City. The degree of harm may be far less than development on the edge of the existing built-up area of the City of within the villages surrounding the main built-up area. However, at this stage, it is by no means clear what impact the infrastructure necessary to facilitate this development might have on the elements which contribute to York's special character and setting.</p> <p>Historic England felt the impact of development of ST15 upon SOA14 should be amended to "serious harm" as it will clearly affect the openness of the Green Belt, resulting in harm to elements which contribute to the special character and setting of the historic City. The degree of harm may be far less than development on the edge of the existing built-up area of the City of within the villages surrounding the main built-up area. However, at this stage, it is by no means clear what impact the infrastructure necessary to facilitate this development might have on the elements which contribute to York's special character and setting.</p> <p>Historic England felt the impact of development of ST31 upon SOA14 should be amended to "serious harm" as it could harm a number of elements which contribute to the special character of the historic City. The site is perceived as being a part of the swathe of open countryside south of the ring road, it would alter the relationship of the historic city of York to the surrounding villages and would further reduce the distance between Copmanthorpe and the edge of the City to less than 1km.</p> <p>Historic England felt the impact of development of ST27 upon SOA14 should be amended to "serious harm" as it could harm two elements which contribute to the special character of the historic City. Expansion of the University would bring development very close to the Ring Road, this will fundamentally change the relationship which the southern edge of York has with the countryside to its south and perceptions of the city while travelling along this route. Development would also alter the relationship of the historic city of York to the surrounding villages, expansion of the University would effectively reduce the gap between the edge of the built up area of the City and this proposed new settlement at</p>
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	<p>Heslington Lane (ST15) to 1.6km.</p> <p>Historic England felt the impact of development of ST19 upon SOA14 should be amended to “serious harm”. In order to retain the separation between the Business Park and nearby villages, the southern extent of this area should not extend any further south than the existing car park to the south of Redwood House. Without this reduction, the development of this area would threaten the separation of Northminster Business Park from the village of Knapton which would be just 250 metres from the southern boundary of this area.</p> <p>Historic England felt the impact of development of ST37 upon SOA14 should be amended to “serious harm” as it would result in the considerable narrowing of the green wedge that centres on Bootham Stray, harming one of the key elements identified in the Heritage Topic Paper as contributing to the special character and setting of York.</p> <p>Historic England felt the impact of development of E16 upon SOA14 should be amended to “serious harm”. Residential development should not be allowed in the undeveloped area to the south of the existing buildings as it would considerably reduce the gap between the Ring Road and what would in effect be the southern edge of the village of Poppleton, harming a number of elements that contribute to the special character and setting of the city. Moreover, it would also reduce the gap between what would be perceived as being the southern edge of the village of Poppleton and Northminster Business Park leading to the threat of the coalescence of these two areas.</p> <p>Historic England disagrees with the conclusions that Policies ED1 to ED5 will have a positive impact against SAO14. Cannot support ED2 as a policy that allows existing buildings on campus to be demolished and replaced could result in considerable harm to the original University campus which is increasingly recognised for its architectural and historic value in terms of post-War University developments. Regarding ED3 same comment as ST27 (Expansion of the University would bring development very close to the Ring Road, this will fundamentally change the relationship which the southern edge of York has with the countryside to its south and perceptions of the city while travelling along this route. Development would also alter the relationship of the historic city of York to the surrounding villages, expansion of the University would effectively reduce the gap between the edge of the built up area of the City and this proposed new settlement at Elvington Lane (ST15) to 1.6km.)</p> <p>Historic England fundamentally disagree with Table 6.4 SAO14, given the considerable harm many of the strategic sites seem likely</p>
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	<p>to cause to the historic environment. The cumulative impact of the sites as currently proposed is at best uncertain and at worst likely to result in “serious harm” to that objective.</p> <p>Natural England felt SS19 should be scored negatively in relation to biodiversity considering the difficulty in mitigating for recreational disturbance on Heslington Tilmire SSSI. Expect the SA to clearly set out the wider sustainability reasons why the benefits of this site outweigh the impact of development on Heslington Tillmire SSSI. Without clear evidence of this consider the site to be unsound with regard to the NPPF Para 118 and not legally compliant concerning the SEA Directive.</p> <p>Gallagher Estates has significant concerns with regards to the process for identifying and selecting the reasonable alternatives to deliver the revised housing demand as set out in the Draft Local Plan. Not all of the proposed housing allocations selected or rejected by the new Local Plan (reasonable alternatives) have been appraised using the same methodology and evidence base (and therefore the same level of detail) as deployed in the Preferred Sites consultation paper (2016). This flaw in the methodology is a breach of the requirements of the SEA Directive and Planning Practice Guidance. To rectify this deficiency the City of York Council must undertake a complete reappraise all of the reasonable alternatives considered or rejected through the Local Plan process (including those up to the aborted Local Plan) utilising the same methodology and consult upon the final proposed allocations. These procedural deficiencies mean that the Council has failed to follow due process in undertaking SA of the Local Plan. They render the plan unsound and it does not meet the relevant legal obligations.</p> <p>Yorkshire Wildlife Trust commented to express concerns that the plan could be found unsound without a final HRA screening showing no LSE, particularly in regard to sites ST15 and ST35.</p> <p>Yorkshire Wildlife Trust were unconvinced by the assertion in para 7.1.7., suggesting that a combination of other sites could deliver similar number of houses. The site could be moved further north, a position and configuration similar to the 2014 consultation or there could be an expansion of ST7 and ST14.</p> <p>ID Planning object to the absence of a table for reasonable alternative sites so it is unclear how these sites have been assessed. The SA of the alternative sites to ST8 does not provide meaningful comparisons of environmental impacts to each site. It needs to be clear why conclusions have been made for members of public.</p> <p>Taylor Wimpey objected to ST15 scoring no differently than other</p>
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	<p>sites for proximity to services, asks if this is a flaw in scoring system.</p> <p>Barratt Homes objected to H29 scoring negatively for SA09 (Land use) and SA015 (Landscape), provided evidence to argue for a neutral or positive rating.</p> <p>York Bus Forum expressed concern at many different sections. Comments mainly highlighted the lack of clear proposals to provide bus services to serve developments, lack of work done on reducing the need to travel in areas other than the north-east of the city, three sites in particular that are likely to have significantly negative effects on already congested roads (ST32 and ST36) or have limited access options other than the car (ST26) and will contribute significant amounts of pollution in the already severely polluted AQMAs. ST26 is assessed as having a significant negative effect on SA Objective 7 (climate change) because of very poor sustainable transport links yet there are apparently no proposals in the Plan to address this problem. In Appendix D, Section 6.1 there are no proposals to provide better bus services to address the issue of bus services from areas of York with the highest number of households without a car to other areas of York being less well provided than from the same areas to the city centre. Appendix D, Section 6.2 - The Forum welcomes the Government funded 'i-Travel York' programme, but this has focused mainly on the north-east sector of York and there is no indication whether it will be extended more widely. The plan does not appear to contain any evidence of the results of the programme.</p> <p>One member of the public objected to table NTS3, education should be significant negative effect as the existing primary and secondary schools could not accommodate 300 further families, never mind a full 1,500. They also felt transport in table NTS3 should be significant negative effect are surrounding roads are already at capacity, specifically mentioned Holgate Road and concerns around road safety for school children. In addition, at 6.5.22 comments on significantly positive effect on SA Objective 4 (education and training) are totally inappropriate, these comments relate to employment and do not consider the education needs of families taking up new housing.</p> <p>One member of the public objected to site H31 due to the negative impact it would have on many of the SA objectives.</p> <p>One member of the public objected to site H39, criticises the SA's methodology and states it is subjective. Scoring is not explained, nor is the rationale for including this site or detail regarding negative effect on green belt. There is no clarity over the influence of Green Belt in the SA process. Objects to lack of boundaries for green belt, which influences the clarity of the SA and the suitability of the site.</p>
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	<p>Claims site will reduce impact on climate change but not evidence of this. Elvington has limited services which will lead to people travelling in private cars.</p> <p>One member of the public objected to ST8 scoring against SA objectives, thought it would do worse than alternatives due to the gap to Huntington. Considers that the SA does not evaluate equally the reasonable alternatives identified between Appendix H and Appendix I. It does not present alternative strategic sites in Appendix I which makes comparison of allocated sites to reasonable alternatives impossible. The SA does not offer reasoning as to how conclusions were reached in selecting sites for allocation (or choosing not to) and therefore renders the assessment outside the scope of the applicable regulations. Importance of this point confirmed through high Court judgement Save Historic Newmarket Ltd and others vs Forest Heath District Council and the SoS for CLG.</p>
Comments	<p>Historic England felt it was not clear precisely how the conclusions of the Heritage Impact Assessment (HIA) have been incorporated into the Sustainability Appraisal. The HIA evaluates the impact of each of the allocations against each of the six Principal Characteristics of the City which are set out in the Heritage Topic Paper. However, the HIA does not make an overall conclusion about the likely impact of each of those sites upon the historic environment. It is therefore not clear how Table NTS3, for example, has arrived at its assessment of the likely impact of each of the sites upon SAO14. There needs to be greater clarity of how the conclusions of the HIA relate to SOA14.</p> <p>Historic England commented that there was no explanation as to why some of the columns in table NTS3 are sub-divided into two.</p> <p>Historic England doubt that the quantum of development being proposed for York Central is deliverable in a manner which will safeguard the numerous heritage assets in its vicinity but also not have significant knock-on effects upon the remainder of the historic core of York. Given this, the impact of the development of this site upon SOA14 should be amended to uncertain.</p> <p>Historic England strongly advises that the council's conservation and archaeological staff are closely involved throughout the SA part of the plan.</p> <p>Environment Agency comments on how the baseline assessment for geology (Para. 4.14.1) focuses on agricultural soil. Information could be included on local bedrock (Sherwood Sandstone) and aquifer designations (principal Aquifer). Enquired whether it would be possible to provide some further explanation of each sustainability objective in the documentation to better understand</p>

	<p>how the impacts on groundwater have been considered in the sustainability assessment. The SUNO CAMS updated in 2013 referred to in Section 4.8.6 has been updated again, recently, and will be uploaded at the end of 2017. Any local Plan updates after the CAMS is published should reference the updated CAMS.</p> <p>Environment Agency comments that the assessment of potential impacts on groundwater quality and quantity should form part of Objective 10 'Improve water efficiency and quality'. It is unclear whether this is the case [in the SA]. It would be good to see the importance of the Sherwood Sandstone Principal Aquifer recognised [in the baseline assessment for geology].</p> <p>Para 7.1.7 that states no appropriate alternatives to site ST15 were identified, Natural England requests more details be provided on alternatives which were considered to comprise the Spatial Shapers of the City criteria, plus an explanation of how the different components of the Spatial Shapers of the City framework including nature conservation sites were weighed up against each other to determine that ST15 was the most sustainable option. Recommends that para 7.1.6 (regarding the avoidance of locations that have high biodiversity and recreational value in the context of ST15) should be clarified.</p> <p>Natural England is broadly in agreement with the Habitat Regulation Assessment. Broadly welcome and agree with the screening of policies in section 3, however there are a number of concerns regarding the screening out of certain impacts. 1. Agree that air quality impacts from traffic emissions on roads in close proximity to Strensall Common SAC cannot be ruled out with regard to likely significant effects and traffic modelling should be undertaken. This should be with regards to the impact of the wider plan and any neighbourhood plans not just the nearby housing and employment allocations. However it is correct to identify that these sites are likely to contribute most. 2. The issues identified in paras 3.61 to 3.72 can be considered in the assessment, the assessment of traffic emissions on the River Derwent SAC, Lower Derwent Valley SAC, Ramsar and Special Protection Area (SPA and Skipwith Common SAC should focus on whether there are roads within 200m of the sites and if they are to see significant increases). 3. Broadly agree with the assessment of recreation disturbance in paras 3.24 to 3.51 the wider cumulative and in-combination impacts of the Plan and neighbouring plans should be considered in relation to recreational disturbance on Strensall Common SAC. Further discussion of available alternative Greenspace and potential for mitigation should be explored in relation to the Lower Derwent Valley European Sites. Agree with the conclusions with regards to the impacts of Policy SS19 and sites E18 and H59. Proximity of ST35 to Strensall Common wider urban edge effects should be considered in the Appropriate Assessment. Welcome the</p>
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	<p>identification that further assessment is required with regards to the impacts from ST15 on the Lower Derwent Valley SPA bird species. Site ST35 includes a section of the Strensall Common SAC within its boundaries. This should be removed in order to avoid any direct loss of designated features.</p> <p>Gallagher Estates commented that as part of the new Local Plan, a review of the spatial distribution strategy should have been undertaken to address a number of key sustainability issues which could be positively addressed by ensuring that the spatial strategy considers social, economic and environmental matters in a balanced manner. Section 4.4 of the Sustainability Appraisal identifies that whilst there has been a general reduction in deprivation across York there remain notable pockets of deprivation which should be tackled and is identified as a key sustainability issue for the Local Plan. The location of new housing within or close to these areas of deprivation would bring substantial social benefit which should be considered against any environmental impact. Also, given the level of out-commuting to the City of Leeds, there is a strong sustainability argument for focusing development in the western part of the city.</p> <p>One member of the public mentioned that a neighbourhood forum has been set up for Acomb and Westfield and a plan developed to create policies to conserve, maintain and enhance the heritage in the area. A 2013 CYC historic character assessment survey was carried out in Westfield and North Acomb that noted an unusually high number of listed buildings, survival of the medieval village plan and areas of archaeological and conservation importance. The survey made a number of recommendations - these should be incorporated within the Plan and the significant heritage Acomb centre should be included in the Heritage Topic Paper. Please note also that non-designated heritage assets do not have to be on the local list in order to be protected within NPPF.</p>
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Heritage Impact Appraisal

Over the past few years the Council has undertaken a great deal of work to identify the various elements which contribute to the special character and setting of the historic City. This work, the Heritage Topic Paper, has helped to provide a framework against which to consider not only the appropriateness of the development strategy for the future growth of the City, but also the individual sites where that growth may be accommodated. Historic England welcome the summary of the Six Principle Characteristics which contribute towards York's special character and setting and illustrates how the various elements of the Plan are intended to safeguard or reinforce these characteristics.

However, Historic England queries how the conclusions of the Heritage Impact Assessment (HIA) have been incorporated into the Sustainability Appraisal. While the HIA evaluates the impact of each of the allocations against each of the six Principal Characteristics of the City which are set out in the Heritage Topic Paper, it does not make an overall conclusion about the likely impact of each of those sites upon the historic environment. It is therefore not clear how Table NTS3, for example, has arrived at its assessment of the likely impact of each of the sites upon SAO14. There needs to be greater clarity of how the conclusions of the HIA relate to SOA14.

Historic England suggests that the Council undertakes a comprehensive assessment of each site to ascertain what scale and density of development each can accommodate without harming the special character and setting of the City and what the implications would be if development was brought forward which did not conserve York's special character. Comments make particular reference to:

Site	Heritage Impact Appraisal comment
ST5 (York Central) – doubt that the quantum of development being proposed (1,500 dwellings/61,000sqm of office floorspace) is deliverable in a manner which will safeguard the numerous assets in its vicinity but also not have a significant knock-on effects upon the remainder of the historic core of York.	The impact of development upon principle characteristics 1, 3 and 4 should be amended to ‘uncertain’. The HIA should recommend that a masterplan is produced for the site to demonstrate whether the scale of development proposed for the area is consistent with the conservation of the elements which contribution to the special character of the historic city.
ST7 (Land east of Metcalfe Lane) - The allocation will harm a number of key elements identified in the Heritage Topic Paper as being of importance to the special character and setting of the City: would reduce the gap between the A56 and the edge of the built up area to just 575 m at its narrowest point, impacting on key views and a large encroachment into open countryside; a new settlement so close to the existing urban edge would appear out of keeping with York's historic pattern of development, harming this element of its character. Development should be pulled away from the ring road - the most appropriate approach may be for some limited development on the eastern edge of the City, of a scale which does not harm the scale or compact nature of the City.	The Heritage Topic Paper Update identifies the relationship which York has to its surrounding settlements as being one of the elements which contribute to its special character and setting. This new settlement would appear out of keeping with the current pattern of development around York and harm this element of York's character. The HIA should recommend that the eastern edge of ST7 is pulled away from the ring road. The most appropriate approach might be to allow limited development on the eastern edge of the existing built up area of the city provided that this is of a scale that does not harm the scale or compact nature of the city. The impact of the development on principal characteristic 6 should be amended to ‘serious harm’.

Site	Heritage Impact Appraisal comment
<p>ST8 (Land north of Monks Cross) - The allocation seems likely to harm a number of key elements which contribute to the special character and setting of the City: development would reduce the gap between the ring road and the urban edge, impacting on the rural setting of the City. It would start to enclose the western edge of Monk Stray, one of the City's important green wedges; the open areas either side of Monks Cross Link Road, along with historic field patterns, contribute to the character of this area. Development would be poorly linked to existing residential areas. In order to reduce the site's impact, development should be pulled away from the ring road and the Monks Cross Link Road.</p>	<p>Development will substantially reduce the gap between the edge of the built-up area and the Ring Road and, as such, would adversely affect the rural setting of the city in this location. It would also start to enclose the western edge of the green wedge that is centred on Monk Stray and impact the open areas either side of Monk's Cross Link Road with the remnants of historic field patterns that contribute to the character of this area. The HIA should identify serious harm in relation to principle characteristic 6, and further recommend that development is pulled away from the northern Ring Road and Monks Cross Link Road.</p>
<p>ST14 (Land west of Wigginton Road) - There is considerable work still to do to demonstrate that the infrastructure necessary to deliver this scale of housing can be achieved in a manner which will minimise harm to the rural setting and does not harm other elements which contribute to the special character and setting of York.</p>	<p>Development will clearly affect the openness of the Green Belt, resulting in harm to elements which contribute to the special character and setting of the historic City. The degree of harm may be far less than development on the edge of the existing built-up area of the City of within the villages surrounding the main built-up area. However, at this stage, it is by no means clear what impact the infrastructure necessary to facilitate this development might have on the elements which contribute to York's special character and setting. The HIA should identify serious harm in relation to principle characteristic 6, and further recommend that the impact that infrastructure necessary to facilitate development might have on the special character and setting of the city.</p>
<p>ST15 (Land west of Elvington Lane) - There is considerable work still to do to demonstrate that the infrastructure necessary to deliver this scale of housing can be achieved in a manner which will minimise harm to the rural setting and does not harm other elements which contribute to the special character and setting of York.</p>	<p>Development will clearly affect the openness of the Green Belt, resulting in harm to elements which contribute to the special character and setting of the historic City. The degree of harm may be far less than development on the edge of the existing built-up area of the City of within the villages surrounding the main built-up area. However, at this stage, it is by no means clear what impact the</p>

Site	Heritage Impact Appraisal comment
	infrastructure necessary to facilitate this development might have on the elements which contribute to York's special character and setting. The HIA should recommend that the impact of necessary infrastructure on the special character and setting of the city should be evaluated.
ST19 (Northminster Business Park) - No objection to the principle of development provided that, in order to retain separation between the business park and nearby villages, the southern extent of this area should not extend any further south than the existing car park to the south of Redwood House. Without this reduction development would threaten the separation of Northminster Business Park from the village of Knapton which would be just 250m from the southern boundary of the area.	In order to retain the separation between the Business Park and nearby villages, the southern extent of this area should not extend any further south than the existing car park to the south of Redwood House. Without this reduction, the development of this area would threaten the separation of Northminster Business Park from the village of Knapton which would be just 250 metres from the southern boundary of this area. The HIA should identify serious harm in relation to principle characteristic 6, and further recommend that the southern boundary of the site should extend no further than the car park to the south of Redwood House.
ST27 (University of York) - The future expansion of the University should be restricted to within the Campus East and consideration should be given to the expansion of the university in a northerly direction onto site ST4 instead. Notwithstanding stated policy caveats, development could harm 2 elements which contribute to the special character and historic setting of the City, notably: the site's prominence in relation to the A64 - development would fundamentally change the relationship which the southern edge of York has with the countryside to its south. It will alter people's perceptions when travelling along this route about the setting of the city within an area of open space, and may not be successfully mitigated through 'landscaping' (previously amounting to alien earth bunding); the expansion would alter the relationship of York to its surrounding villages, in terms of distance, scale and the fact that they are free-standing and clearly definable settlements. The	Development could harm two elements which contribute to the special character of the historic City. Expansion of the University would bring development very close to the Ring Road, this will fundamentally change the relationship which the southern edge of York has with the countryside to its south and perceptions of the city while travelling along this route. Development would also alter the relationship of the historic city of York to the surrounding villages, expansion of the University would effectively reduce the gap between the edge of the built up area of the City and this proposed new settlement at Elvington Lane (ST15) to 1.6km. The HIA should identify serious harm in relation to principle characteristic 6, and further recommend that expansion of the campus is restricted to Campus East and consideration should be given to the expansion on the university in a northerly direction to ST4.

Site	Heritage Impact Appraisal comment
development would reduce the gap between the city and ST15 to 1.6km.	
ST31 (Land south of Tadcaster Road, Copmanthorpe) - Recommends deletion of the site. The development could harm a number of elements which contribute to the special character and setting of the City. Site is perceived as being part of a swathe of open countryside south of the ring road; would impact on the relationship of Copmanthorpe with the City of York, in which the village is currently identifiable as a freestanding settlement; cumulative impact of P+R site at Askham Bar with proposed allocation would reduce the gap with the urban edge to less than 1km.	Development could harm a number of elements which contribute to the special character of the historic City. The site is perceived as being a part of the swathe of open countryside south of the ring road, it would alter the relationship of the historic city of York to the surrounding villages and would further reduce the distance between Copmanthorpe and the edge of the City to less than 1km. The HIA should identify serious harm in relation to principle characteristic 6. The HIA should recommend that ST31 is deleted.
ST37 (Whitehall Grange) - Recommends deletion of the site. The site forms part of the green wedge that extends into the north of the City, which is centred on Bootham Stray. Although there are a handful of building on this site, it is clearly perceived as a part of this open area. The loss of this site and its subsequent redevelopment would result in the considerable narrowing of this wedge and harm one of the key elements identified in the Heritage Topic Paper as contributing to the special character and setting of York.	Development would result in the considerable narrowing of the green wedge that centres on Bootham Stray, harming one of the key elements identified in the Heritage Topic Paper as contributing to the special character and setting of York. The HIA should identify serious harm in relation to principle characteristic 6. The HIA should recommend that site ST37 is deleted.
E16 (Poppleton Garden Centre) - Objects to the extension of development beyond the footprint of existing buildings on site. Such development would reduce the gap between the ring road the effective southern boundary of Poppleton. It would harm a number of elements identified as contributing to the special character and setting of the City. Along with ST2, this would result in a considerable alteration to the setting of Poppleton as a free standing settlement, and its relationship with the City. It would threaten coalescence with Northminster Business Park to the south.	Residential development should not be allowed in the undeveloped area to the south of the existing buildings as it would considerably reduce the gap between the Ring Road and what would in effect be the southern edge of the village of Poppleton, harming a number of elements that contribute to the special character and setting of the city. Moreover, it would also reduce the gap between what would be perceived as being the southern edge of the village of Poppleton and Northminster Business Park leading to the threat of the coalescence of these two areas. The HIA should identify serious harm in relation to principle characteristic 6

Duty to co-operate/cross boundary issues

Summary of Prescribed Body Representations on City of York Local Plan Pre Publication Draft (Regulation 18) Consultation, 2017	
Prescribed Body	Summary of Representation
East Riding of Yorkshire Council (ERC)	<ul style="list-style-type: none"> The draft plan, which has been based on ongoing co-operation between the two authorities throughout the plan making process. Strongly supports the provision of sufficient housing within the York Local Plan to enable the full need for housing to be met within the York HMA. Welcomes the identification of strategic highways network improvements at Grimston Bar in policy T4 and the need for joint working. Expressed concern at the Breen Belt boundary being set precisely at 6miles from the city centre as this would encroach into East Riding. More detailed comments relating to Site ST15 Land West of Elvington Lane
Environment Agency	<ul style="list-style-type: none"> On the whole, the Environment Agency's comments from previous consultations have been taken on board and the EA find the content of the plan positive. The section on green infrastructure is good and recognises the dual of both green open spaces and mitigation of current and future flood risk, as sustainable drainage systems (SuDS) or flood storage, can be achieved. More detailed comments on policies relevant to its remit, e.g. Flood risk and land contamination.
Hambleton District Council (HDC)	<ul style="list-style-type: none"> The document identifies sufficient land to meet the development needs of the City and establishes a Green Belt enduring 20 years. It does not safeguard land for development and recognises the build out time of the strategic sites will extend beyond the plan period. The proposed detailed boundaries of the Green Belt offer little opportunity to accommodate the increased level of growth proposed in the White Paper, should this be required. If the City of York does not ensure that its longer term development needs are met this will place pressure on areas in neighbouring authorities. The Local Plan has been subject to viability testing and the proposed allocations have been selected through a robust assessment process, but the level of assessment that has been undertaken to confirm the viability and deliverability of the allocated sites is unclear
Harrogate Borough Council (HBC)	<ul style="list-style-type: none"> No representation made at this stage but ongoing discussions under the Duty will continue as the plan is taken forward
Highways England (HE)	<ul style="list-style-type: none"> Welcome the emphasis on sustainable travel, high quality public transport links serving new sustainable

Summary of Prescribed Body Representations on City of York Local Plan Pre Publication Draft (Regulation 18) Consultation, 2017

Prescribed Body	Summary of Representation
	<p>communities and travel planning as key components of policy, and that new development sites are located with good access to public transport, walking and cycling networks, thereby minimising growth in traffic.</p> <ul style="list-style-type: none"> • The Plan lacks recognition of the scale of the forecast traffic growth on the A64 trunk road and its junctions with local primary roads will require physical mitigation in the form of investment in highway infrastructure despite the extensive sustainable travel proposals. • The spatial distribution and particularly the development of land opportunities in the south and eastern parts of York should be dependent upon agreement between the Council and HE of a Management Strategy for the A64 and its junctions with the local primary road network. • HE expects that the strategic sites located around the A1237 Northern Ring Road will combine to have a significant impact on the junctions of the A1237 with that A64 east and west of York. It will need to have a good understanding of that cumulative impact if it is to be able to state that the Plan is sound at Publication Draft stage. • HE will continue to work in partnership with CYC to understand the impact of the Local Plan proposals on the operation of the A64 and its junctions with the primary road network. • Requested that the key principles in many of the Spatial Strategy (SS) policies for the strategic sites be modified to include HE as an organization to be consulted with by developers when demonstrating that all transport issues have been addressed. • Requested explanatory text to several Spatial Strategy (SS) policies for the strategic sites be modified to include the need for a Transport Assessment to support the key principles relating to demonstrating that all transport issues have been addressed.
Leeds City Region Local Enterprise Partnership (LCR LEP) / West Yorkshire Combined Authority (WYCA)	<ul style="list-style-type: none"> • The Plan forms a complete suite of local policies and directly addresses many aspects of the strategies in the SEP. • Land allocations for the provision of jobs will support sustainable economic activity with a focus on allocating enough sites to satisfy market demand and maximise connectivity to transport • The Plan supports the aim of increasing the amount of energy generated from renewable and low carbon sources, and supports proposals for renewable and low carbon infrastructure. These elements are well-aligned with the SEP • York has not applied the 10% market signals adjustment as recommended in the York 2017 Strategic Housing Market Assessment.

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Prescribed Body	Summary of Representation
	<ul style="list-style-type: none"> • The Plan policies could strengthen the commitment to delivering better digital infrastructure which would support the SEP priorities • Sites and policies are not supported by an up to date infrastructure delivery plan and one would be expected. • The Plan acknowledges that commuting to destinations outside York occurs. Welcome that improvements to York Railway Station are included in the plan to accommodate enhancements for the planned electrification of the Trans Pennine Line, HS2 and Northern Powerhouse Rail aspirations.
North Yorkshire County Council (NYCC)	<ul style="list-style-type: none"> • York is an important driver for growth both within the York, North Yorkshire and East Riding LEP area and the Leeds City Region. It is important that the City has a robust and high quality Local Plan in place that best enables it to unlock economic growth and prosperity for the benefit of its communities and those of its wider hinterland. • Welcome the commitments set out in Policy DP1: York Sub Areas. In particular that York will <i>'fulfil its role as a key driver in the Leeds City Region , York, North Yorkshire and East Riding Local Enterprise Partnership (LEP) area...'</i> and <i>'The housing needs of City of York 's current and future population including that arising from economic and institutional growth is met within the York local authority area.'</i> • Support the general thrust and intent of Policy SS1 : Delivering sustainable growth for York • Policy SS2: the Role of York's Green Belt - defining a clear and detailed inner boundary of the York Green Belt is welcomed and supported. In defining the Green Belt boundary it is important that the evidence underpinning the decision is clearly presented and included within the narrative accompanying the policy. NYCC recognise that the Plan makes provision up to 2038, providing for an additional 5 years beyond the plan period. In adopting this approach it is acknowledged that in the longer term consideration will need to be given to how future growth needs will be managed to provide confidence in relation to planning for infrastructure and services including within neighbouring parts of North Yorkshire • Any traffic impact on NYCC's local highway network that could arise from allocations need to be identified and considered. Where it is clear that a development will have a material impact on its local highway network, NYCC request to be included in agreeing the scoping for the Transport Assessment (TA) and Travel Plan (TP) in addition to being formally consulted during the application process. • Ask that within CYC's transport evidence account is taken

Summary of Prescribed Body Representations on City of York Local Plan Pre Publication Draft (Regulation 18) Consultation, 2017

Prescribed Body	Summary of Representation
	<p>of the traffic generated by the allocations of surrounding planning authorities., particularly Harrogate district and the Green Hammerton settlement and that committed developments within North Yorkshire that will impact on cross border issues are included.</p> <ul style="list-style-type: none"> • The Development of the York Central site will provide new economic and residential uses and activity in the centre of the City in a location well connected to sustainable transport which will benefit from regeneration.
Ryedale District Council (RDC)	<ul style="list-style-type: none"> • No representation made at this stage but ongoing discussions under the Duty will continue as the plan is taken forward
Selby District Council (SDC)	<ul style="list-style-type: none"> • Broadly supports the Local Plan approach and its policies, and more specifically, Policy DP1 • SDC notes Policy SS1 states that the plan will deliver a minimum of 867 dwellings per year .Having read the SHMA Addendum, it is also noted that this figure does not take into account the level of employment growth proposed by the Local Plan and that the SHMA has not undertaken a full update to the analysis of economic growth. Whilst the SHMA concludes that there is unlikely to be any justification for an uplift in housing numbers in York to support expected growth in employment, Selby District Council need to be confident that undertaking a policy-on approach to housing need would identify no more than 867 dwellings per annum. • CYC will also be aware of the proposed methodology for the calculation of housing need requirements set out in the in the DCLG consultation on 'Planning for the Right Homes in the Right Places', which if taken forward would increase York's housing requirement figure to 1,070 dwellings per annum. Whilst you are confident that you can realise the growth aspirations detailed within the Pre-Publication Local Plan within the City of York boundary, Selby District Council is concerned that any increases to this figure could raise significant cross-boundary issues. • Question whether a Green Belt boundary enduring for 20 years is sufficient to meet the NPPF as it pertains to the intended permanence of Green Belt boundaries in the long term so they are capable of enduring beyond the plan period. • Site ST15 is in a remote location and will require significant investment in public transport infrastructure. The cumulative impact of this proposed new settlement on the highways network, along with the proposed expansion of York University (Site ST27) and the employment allocation at Elvington Airfield will need to be mitigated. Selby District Council need more detail to that shown in the Transport Topic Paper, before providing any further comments on the potential impact this allocation

Summary of Prescribed Body Representations on City of York Local Plan Pre Publication Draft (Regulation 18) Consultation, 2017

Prescribed Body	Summary of Representation
	<p>may have on Selby district.</p> <ul style="list-style-type: none"> • CYC as education authority, will need to be satisfied that Wheldrake with Thorganby CE School is capable of meeting any additional demand generated by Site ST33, without any detriment to the population of Thorganbury (in Selby District)
<p>York, North Yorkshire and East Riding Local Enterprise Partnership (YNYER LEP)</p>	<ul style="list-style-type: none"> • The quantum and nature of the proposed development will be of great strategic benefit to this LEP area and it is important that the Local Plan is advanced to adoption quickly to allow delivery of these sites. • Past issues of under delivery of housing, together with recent market signals for York mean that it will be essential to achieve the proposed minimum annual provision of 867 dwellings over the plan period, together with any additional homes to reflect under delivery. • Concerned at only 60,000m² of B1a office space at York Central, given the significantly higher figure in the EZ proposal and the pivotal role of such development on this site for the economy of York and the LEP area • Welcome the funding from WYCA to undertake feasibility and business case development for dualling the A1237 • Grimston Bar junction, that already has capacity problems and faces increasing pressure through the Local Plan proposals, is important for east-west connectivity

Comments re Plan Methodology

<p>Support</p>	<p>Earswick Parish Council and Fulford Parish Council both support safeguarded land no longer being designated for longer-term development</p> <p>Earswick Parish Council also supports the protection of environmental assets, open space and prevention of village coalescence. Also support setting a detailed green belt boundary. Suggests considering the period beyond the plan period to 2037 - a requirement of the NPPF.</p> <p>Support of the use of brownfield sites to deliver homes.</p>
<p>Objection</p>	<p>Home Builders Federation recommends that more sites are allocated than required to meet the housing requirement. Such an approach would be consistent with the NPPF requirements. 70% for large strategic sites may be an over-estimate given the infrastructure contributions will be required. It is more appropriate for the Council to continue to work with site developers to ensure appropriate numbers are used.</p> <p>How Planning on behalf of Barwood Strategic Land LLP comment that there is a lack of evidence in the evidence base and much is out of date, such as the historic character and setting evidence base. This renders the sites unsound.</p> <p>Johnson Mowat (on behalf of KCS Development Ltd, Redrow Homes, Linden Homes, Yorvik Homes, K Hudson and G M Ward Trustees and Vernon and Co.) objects to the Spatial Strategy not explaining how or why the Council arrived at this approach, or including the implications of this of spatial distribution/ the alternatives.</p> <p>Concern over the substitute space at Haxby Road Sports field and the distance of 15 minutes. A walk by Save-Our-Space campaigners proved it took much longer to cover the near three-mile route to the University's Haxby Road sports fields - the substitute offered by York St John. This has been amended to 20 minutes by public transport in the site selection methodology again without consultation or explanation. This does not take regard for the fact that it could involve changing buses and not everyone will have the same start point.</p> <p>(Turley representing Gallagher Estates) Unclear why some sites have been chosen over others, as no comparative assessment included. Justification should be included. The 2013 Site Selection Paper states that sites over 100 ha in size/ having 3,000+ units were not assessed against criteria 4a and 4b on the basis that they are large enough to provide this infrastructure. None of the new</p>

	<p>settlement options now proposed as part of the Draft Local Plan will provide 3,000 residential units over the plan period. These sites do not provide the numbers for a community and sustainable transport infrastructure needed.</p> <p>Sites of 300-400 residential units can offer the potential to fund improvements to existing local infrastructure in order to improve sustainability of the overall area.</p> <p>Doesn't agree that sites in rural setting should be discounted from site appraisal. From the above mentioned report 'The Approach to the Green Belt Appraisal' states there is land outside built up areas that should be retained as open land due to their role in preserving the historic character and setting of York.' This is at odds with paragraph 84 of the NPPF. It's unreasonable to treat sites in the rural setting of York in the same manner as sites within Flood Zone 3b or areas of ancient woodland for example as the Council has.</p> <p>Ring road land immediately surrounding the main urban area functions as a physical defensible boundary to more open areas of countryside beyond. This is given no consideration and this approach is unjustified.</p> <p>All sites, irrespective of their assumed Green Belt function, need to be subject to a full sustainability appraisal.</p> <p>The publication of a proper Green Belt Assessment important for the development of the Local Plan. Without it is not possible to identify the boundaries of the Green Belt or the appropriate sites to develop. CYC has not produced one and this is a key legal deficiency and fundamental flaw in the plan making process.</p> <p>Pilcher Homes Ltd suggest that an evidence base study is undertaken of the economic and other benefits of the best and most versatile agricultural land within the district.</p> <p>Objection to the designation of H56 which was changed from open space to general housing without any consultation or notification and in breach of guidelines and criteria.</p> <p>Thousands of new homes on greenfield land should not be allowed.</p>
<p>Comments</p>	<p>Locals haven't been listened to or consulted in local plan process. CYC have given the larger sites and landowners priority for ease of development regardless of their suitability. Question as to whether York, an ancient, historic City, needs a new town, rather than extending existing settlements. There are outlying local villages that are losing local services - moderate development in these areas would build houses where they are much needed to ensure their survival and community spirit.</p>

Comments re Spatial Strategy/General Approach to Growth

<p>Support</p>	<ul style="list-style-type: none"> • The ambition that the city's special qualities and distinctiveness should have global recognition is supported by North Yorkshire County Council. • Pegasus on behalf of Lovel Developments Ltd. Support the vision of the Local Plan. Support that the plan seeks to plan for a vibrant city which enhance the vitality of local communities through meeting housing economic development whilst enhancing the city's unique historic, cultural and natural environmental assets. • CPRE - North Yorkshire - support the detailed vision for the Local Plan which is in accordance with the NPPF. The unique approach taken by CYC in setting out its individual development principles is welcomed reflecting the NPPFs requirement for Councils to produce a locally distinctive Plan and allows the reader to clearly understand what CYC is hoping to achieve in order to deliver the vision. • Support for the council's approach that strategic sites contribute to delivering the long-term Green Belt permanence. • Support the vision of the Local Plan. Support that the plan seeks to result in communities that are well connected, well served, environmentally sensitive and considerate of the local environment. • NTR Planning obo McArthur Glen, Aviva Investors & York Designer Outlet give continued support for the need of York to have an up to date Local Plan which delivers the best possible future for the City. The York Designer Outlet has an important role to play in delivering the Council's aspirations in the Plan, providing an important economic and tourist location, employing 1600 people and attracting over 4.5 million visitors per year.
<p>Objection</p>	<ul style="list-style-type: none"> • York and North Yorkshire Chamber of Commerce highlight a disconnect between the broad ambitions in the plan and how they are to be delivered. The Background and Vision acknowledges the importance of the City's two universities to the City's economic strength but later fails to allocate the land the University of York says it requires to accommodate its future growth. The Chamber fundamentally disagrees with the cautious approach to using the baseline forecast to inform the employment land requirements of the Plan.

	<ul style="list-style-type: none"> • Johnson Mowat on behalf of KCS Development- Page 16 Para 2.5 informs that 'By the end of the plan period sufficient sites will have been identified for viable and deliverable house sites ...'. This needs rewording to inform these sites are to be identified now, at the start of the plan period. This para also needs to be clear over the plan period, that being up to 31 March 2038. The quantum of housing referenced in this para at 867 dwellings per annum is also at odds with that referenced in Trajectory Table 5.2 which seeks to make good the early years (2012 to 2017) shortfall and adds back a further 56 dwellings per annum up to 31 March 2033. As such, the requirement for 1st April 2017 to 31st March 2033 is 923 per annum. For the avoidance of doubt, we don't accept that figure but if the Council are to continue with 867, it should at least be referenced correctly. • Johnson Mowat obo landowner indicates the Plan does not adequately set out a proposed spatial strategy and framework for the future development of the City of York. The document contains no narrative as to how or why the council has arrived at its suggested approach, nor does it set out the implications of this pattern of spatial distribution or discuss the alternative options considered. • Several respondents feel the plan should be far more ambitious, not just making the city "fit for the future" but a city that sets new standards other aspire to emulate, it should be looking to radically improve quality of life. Suggestions include: should be doing far more to promote active travel, mentions removing the Castle Car Park and replacing with a city centre cycle park. The university is going to expand again, as is the city as a whole, there should be a 24 hour rail service. Car parking should only be available to those with mobility issues. Make York the greenest city in the UK, with longest-lived, healthiest inhabitants, richest habitats for wildlife and best-preserved heritage. Housing stock should be of highest sustainability standards, well insulated and heated / powered by renewables. Development should be confined to brownfield sites in order to protect wildlife, mixed developments with good quality affordable housing allows communities to thrive. Concerned about the threats to Strensall Common and habitats in Elvington for golden plover and lapwings. Transport in York needs to be radically re-thought, major investment needed in foot and cycle ways. Restrictions on parking both in the city centre and residentially could improve air quality, public transport is a better alternative but should be electric not diesel, small electric vehicles (seating up to six people, as works in the narrow streets of Rome that are similar to York) could be provided for people unable to walk or cycle. Stresses the need for quality modern design, resents poorly deisgned 1960s buildings.
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	<ul style="list-style-type: none"> • A respondent was not clear of the position in relation to the Council's 'City Vision 2030' and the local plan's vision. The background section adds to the lack of clarity, specifically in relation to the RSS, One Planet York, York Economic Strategy plus numerous references to other plans and programmes with no explanation to their relevance. Another respondent was disappointed by lack of vision - a collection of sites that are required to meet minimum standards for environmental protection, sustainability, transport requirements, green spaces, energy efficiency and social housing. Mentions the urgency of climate change, as such would like to houses built to highest environmental standards, community gardens, a car free city centre, cycling infrastructure, air quality etc. Would like to see more communities actively involved in running of their local areas. Should be able to walk / cycle the length of the river on either side, need more ambitious plans for riverside development. • One respondent considered that it would be better to add development to existing villages rather create a new garden village. Another respondent said there does not need to be any more building in York, not for housing, businesses, roads or anything else as enough land has been taken by the universities. Land is for growing food and rearing livestock, university sports fields should be returned to agriculture. York is no longer a historic city, just student housing office buildings and car parks.
<p>Comments</p>	<ul style="list-style-type: none"> • York and North Yorkshire Chamber of Commerce state that the analysis presented in the Background and Vision Chapter is confusing and contradictory. For example, Para. 1.24 states the city is in good shape, but Para.1.31 then highlights that the City's ranking on the Index of Multiple Deprivation indicates that as a whole it has become more deprived. • Historic England give support for the general summary of the City's many heritage assets and the general contribution that York's historic environment makes to the City. Note suggested change at para 1.49 to identify 'safeguarding the special character and setting of the history city' as being the 'primary' purpose of York's green belt, using terminology from NPPF and daved RSS. Notes that the vision itself is not particularly place specific, nor does it articulate the special qualities and distinctiveness of the historic city. Suggested alternative text: "York aspires to be a City whose special qualities and distinctiveness are recognised worldwide, where its unique legacy of historic assets are preserved and enhanced, and where the full potential that its historic buildings, spaces and archaeology can contribute to the economic and social welfare of the community is realised. The Local Plan...etc". Given that york's historic environment plays such a key role in the economic

	<p>well-being of the City, the quality of life enjoyed by its communities and in placemaking, that the Vision and approach to managing the City's heritage assets should place Heritage at the forefront of the plan (ref para 2.8-2.11, to be moved to below the vision box, and renamed 'Conserving and enhancing the environment' to reflect NPPF). Sub-heading para 2.8 amend to 'The historic environment'.</p> <ul style="list-style-type: none"> • York Green Party stress the importance of getting a plan in place, protecting local green space as well as the green belt but wish the plan was more ambitious in terms of sustainable public transport infrastructure and had strategic action behind it as opposed to the current laudable but ultimately aspirational objectives. Specifically mentions the prospect of a light rail system (funded through planning gain and regional infrastructure funding) as many strategic sites admit congestion is a major problem but only offer very limited solutions. Generally support the plan but disagree with the higher housing target as it is pushing at and beyond the boundaries of what the city's infrastructure can sustain, particularly in terms of transport and air quality, but drainage and biodiversity too. Stress the importance of providing affordable housing given our past under-delivery, the council should be funding some affordable housing directly. Furthermore, for affordable housing to be truly accessible it must be combined with sustainable, affordable public transport. Remain sceptical that a high housing target will make any difference to the actual delivery of affordable housing. Feel that the plan should consider a more equitable distribution of new housing across the city. To create sustainable developments which respect York's environment, provide warm affordable homes and are resilient against a future of rising energy prices and diminishing resources the Plan must also include an active and clear commitment to the environmental sustainability embodied in the One Planet York principles, including zero carbon building and the development of local renewable energy networks. All development principles and site allocations should be measured against this using an improved version of the decision making tool currently being trialled for major policy decisions. Points regarding the written style of the plan: 1) Throughout the document statements of intent need to be clearer and more definite, without so many qualifying clauses. 2) There is lack of consistency between the treatment of the various strategic sites in the document. There is a great deal of detail in the policy principles for some relatively small sites, whilst some far larger sites are very short on detail. Principles that apply to one site, for example requirements for very high levels of sustainable building, should be applied to all sites, unless there is an exceptionally good reason why they wouldn't be applicable. 3) Not at all clear why for some sites make reference to the provision of affordable housing in keeping with
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	<p>the affordable housing policy and some don't. Surely they should all say this?</p> <ul style="list-style-type: none">• Johnson Mowat obo landowner indicate it is unclear which jobs growth forecast has been used, and how this relates to the Leeds City Region work and the Northern Powerhouse.• Several responses related to housing affordability, in particular it was felt unmet housing need in York exacerbates affordability issues and puts pressure on neighbouring authorities to meet need. The plan is reliant on several large strategic sites to deliver very significant dwelling numbers and will require significant infrastructure. It was also considered that the plan's vision may not be in the interests of ordinary hard working families, with particular reference to the lack of social/affordable housing. The Plan should focus more on addressing and discussing key planning, community and development issues. Should generally focus more on social issues.• It was also highlighted that providing recreational facilities does little to promote healthy lifestyles when surrounding streets are traffic clogged and polluted. The proposals for the Green Belt do not currently direct development to the most sustainable locations. Requires more holistic approach.
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Comments re Duration of the Plan/Phasing

Support	N/A
Objection	<p>Home Builders Federation has objected stating that the Plan covers the period from 2017 to 2032/33 with the exception of the Green Belt boundaries that endure up to 2037/38. However, they state that it is evident that other policies within the Plan also include information for the period to 2032/33. This may provide confusion and also that it is more appropriate to move to a consistent Plan period to 2037/38 throughout. They also note that the 2032/33 period will not endure a 15 year time horizon post adoption as preferred in NPPF (paragraph 157). Understanding that there may well be implications for the evidence base, site allocations and policies, HBF still recommend that CYC consider extending the end date to the Plan.</p> <p>Johnson Mowat (on behalf of KCS Development and landowners) objects to the fact that CYC have not produced a trajectory or evidence to support a 5 year housing supply as required by NPPF. Clarity has been requested surrounding the 'About the Plan' paragraph i) that confirms that the Local Plan period runs from 2017 to 2032/33 with the exception of Green Belt boundaries which will endure to 2037/38. They believe the Plan period should be described as from 1st April to 31st March 2038 to avoid confusion. They highlight that housing delivery beyond 2033 tails off (delivering half the required annual requirement through only three known sites and windfalls). Given the lack of safeguarded land the Plan fails to justify its 2038 end date and point to potential delivery issues on sites such as York Central.</p> <p>Johnson Mowat also raise the issue of the relevant OAN to be applied and depending on which figure is used will potentially highlight further the 5 year supply and buffer issues in the trajectory. Both the Council's 2017 Local Plan and SHLAA contain a delivery trajectory but lack any real detail. They believe CYC are heavily reliant upon several large strategic sites making an early delivery of a large number of homes – this is seen as being unrealistic especially given the known lead in times for large sites such as ST14, ST15 and ST35. With a larger OAN and longer lead in times, the Plan falls well short of achieving a 5 year housing supply.</p> <p>How Planning (on behalf of Barwood Strategic Land LLP) state that the inclusion of specific provisions with strategic policies gives no certainty to the delivery of sites.</p> <p>General objections throw doubt on sites being available on time to deliver the required housing levels to meet York's urgent housing need. Decontamination issues at the British Sugar site and both</p>

	<p>Imphal and Strensall Barracks availability for development have been highlighted as potential delays to meeting housing requirements within the Plan period.</p>
<p>Comments</p>	<p>Johnson Mowat (on behalf of Taylor Wimpey) question how the trajectory can support brownfield sites first if all sites are being released in a single phase.</p> <p>General comments received to this theme agree with the delivering of brownfield sites first within the Plan period, especially those close to the City Centre. Though there was a general concern that the delivery of identified strategic sites was speculative at best.</p>

General Comments

<p>Support</p>	<p>Duration of the Plan, Green Belt and Safeguarded Land (Principle of Green Belt, Flexible land supply, Green Belt Appraisal)</p> <ul style="list-style-type: none"> • (Environment Agency) Previous comments have been taken on board. Finds the sections on Green Infrastructure positive and recognises the dual of both green open spaces and mitigation of current and future flood risk, as sustainable drainage systems (SuDS) or flood storage, can be achieved. • (Wheldrake Parish Council, Skelton Village Action Group, Councillor) Supports efforts made to ensure that emphasis is placed upon Brownfield sites and ‘Brownfield first’ approach • (Yorkshire Wildlife Trust) Strongly supports completion of the Local Plan as this can protect wildlife sites from speculative development proposals. • Support of allocation of green space. • A number of respondents support the Plan’s intent to define a green belt boundary for the first time (incl Earswick Parish Council, and Strensall with Towthorpe Parish Council) <p>Economic Growth</p> <ul style="list-style-type: none"> • (West Yorkshire Combined Authority) supports the plan as it supports many of the objectives set out in their Strategic Economic Plan. • Support plan supporting local businesses/economy and working with them to understand changing needs. <p>Infrastructure Delivery and viability</p> <ul style="list-style-type: none"> • Hopes infrastructure has been considered alongside local plan schemes. <p>Historic Environment</p> <ul style="list-style-type: none"> • (Campaign to Protect Rural England North Yorkshire) Fully supports the introductory paragraphs to section 8 Place making: Heritage, Design and Culture. <p>Natural Environment</p> <ul style="list-style-type: none"> • CPRE supports York maintaining tis green infrastructure network and the character and environmental quality of the city. • Yorkshire Wildlife Trust supports the conclusions from HRA screening that there are likely significant effects for policies SS19, E18, H59, SS18 and SS13. <p>Healthcare</p> <ul style="list-style-type: none"> • Local Plan can ensure holistic approach to improving health and well-being of populations to ensure actions match
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	<p>rhetoric.</p> <p>Renewable energy/Climate Change</p> <ul style="list-style-type: none"> • Amongst others, Leeds City Region Local Enterprise Partnership and West Yorkshire Combined Authority support the Plan's aim to increase the amount of energy generated from renewable and low carbon sources. • The HCA supports the Plan's policies relating to Climate change/Renewables. • York TUC strongly supports sustainable design/zero carbon given impact on living standards and fuel poverty. District heating for large developments should be an essential requirement. <p>General Comments (General approach to Growth/ Duty to co-operate/ SA /Consultation process)</p> <ul style="list-style-type: none"> • (Selby District Council) Supports local plan and policies. • (Rufforth with Knapton Parish Council) Well thought out document balancing employment needs for the city whilst protecting the setting of the historic city and rural character of the surrounding villages. • (East Riding of Yorkshire Council) Comments on duty to cooperate and opportunity to comment on plan. • (York Civic Trust) Supports the emerging draft, which embodies the wishes of the citizens of York and their elected representatives. • General support for sites • Copmanthorpe Parish Council – strongly supports the Plan as it affects Copmenthorpe. • NTR Planning obo Mc Arthur Glen etc support the removal of the Designer outlet from the green belt. <p>Education</p> <ul style="list-style-type: none"> • The HCA supports the Plan's general approach to education. <p>Flooding and Drainage</p> <ul style="list-style-type: none"> • CPRENY supports the Flood Risk policies contained within Section 12. <p>Transport</p> <ul style="list-style-type: none"> • Highways England, York Cycle Campaign, support good access to public transport and walking and cycling networks. • York Bus Forum is pleased to see the Council recognise that "Co-location of Development with
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	<p>sustainable transport is paramount and without policy intervention this may not be achieved, negatively affecting the City's ambition to become a more sustainable and environmentally friendly city.”</p> <ul style="list-style-type: none"> • Network Rail support role of public transport within plan. • West Yorkshire Combined Authority and Leeds City Region Local Enterprise Partnership encourages plan to share policies that are in the Transport Strategy. • GVA on behalf of the Homes and Communities Agency (HCA) supports York Central's connectivity.
Objection	<p>Duration of the Plan, Green Belt and Safeguarded Land (Principle of Green Belt, Flexible land supply, Green Belt Appraisal)</p> <ul style="list-style-type: none"> • (York and North Yorkshire Chamber of Commerce) Plan will be ineffective as makes no provision for safeguarded land so will not meet development needs of the city. • A significant number of responses query the expected permanence of the green belt and that the Plan underdelivers against its expected housing target. • Minimal green belt development, relying on industrial land. Two large sites are proposed in the Green Belt, away from existing transport corridors, for which there has been great opposition. Brownfield developments will only add to congestion and no details are given on how these will be achieved. • (Turley representing Gallagher Estates) Absence of a comprehensive Green Belt review, a need to identify more land for release from the Green Belt to meet the need for housing development over the plan period and to ensure the Green Belt can endure beyond this. Also a failure to have regard to the guidance in paragraphs 84 and 85 of the NPPF in appraising sites for allocation and definition of the Green Belt in York. • (Johnson Mowat on behalf of landowner) The spatial strategy and housing figures unsound, five year land supply inadequate. • East Riding of Yorkshire Council consider it inappropriate for the Plan to prescribe the exact extent of the outer green belt boundary, noting that part of ERC would sit within the extent 6 miles form the centre of York. • Fulford Parish Council considers that the Plan's proposed development would cause serious harm to the setting and

	<p>special character of the City.</p> <ul style="list-style-type: none"> • The Local Plan boundary should reflect the Neighbourhood Plan (Nether and Upper Poppleton Parish Councils). • Boundary at York Racecourse unduly restrictive • <p>Housing Growth (including Housing Delivery and the OAHN)</p> <ul style="list-style-type: none"> • More housing will lead to strain on roads, schools and NHS. • (Turley representing Gallagher Estates also supports this) Too few houses planned, 3000 short of government's suggested level. • There is concentrated housing development in the main built up part of the City and not in outlying villages. However, improving the infrastructure of existing peripheral settlements and building additional housing would seem a better solution than the creation of new settlements ST14 and ST15. • (O'Neill Associates on behalf of Jorvik Homes and Galtrees Garden Village Development Company) The number of housing allocations is inadequate to meet anticipated housing needs. • (Johnson Mowat on behalf of Taylor Wimpey) The 'Delivery and Monitoring Tables' to the rear of the Plan contain no requirement to maintain a 5 year supply and what actions are to be taken in the event of a housing delivery failure. This is a failure of the Plan as drafted. Also, in the 'About the Plan' section, the plan period should be clarified to "1st April 2017 Natural Environemnt to 31st March 2038" to avoid confusion. It is unclear in paragraph 1.34 and 4.2 which jobs forecast are being referred to. Para 2.5 should be revised to reference that the sufficient sites are being identified that the start of the plan period and clarify the plan period. For the avoidance of doubt, the housing figure plus backlog should be referenced and therefore 867 dpa should actually be stated as 923 dpa. • (York Labour Group Members) Objects to the plan as it fails to meet York's housing and employment needs, with concern around affordable housing, sustainable communities and economic growth opportunities. • (York Environment Forum) The plan does nothing to address deliverability or affordability. • The National Federation of Gypsy Liaison groups and York Travellers Trust do not accept the outcome of research which concludes only 3 pitches are needed for those meeting the definition – this represents less than 10% of assessed need. Addressing the needs of the community is one of the ways that the plan will enable York can meet its commitments as the UK's first Human Rights City. <p>Economic Growth</p>
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	<ul style="list-style-type: none"> • (York and North Yorkshire Chamber of Commerce) Concerns from 2016 representation about the under provision of housing and employment land have not been addressed. Fails to prepare for future economic challenges which may lead to people leaving the city. • (Integrated Built Environment Ltd.) Ambiguity between national legislation and the Local Plan. Council should ensure that a financial viability assessment report is made available for the developments within the local plan and be open to public scrutiny. Difficult for groups making a case for community-led and other affordable housing developments. • Employment sites are unlikely to provide the number of jobs shown, and the Plan fails to allocate enough employment land to meet current and future demand. • Leeds City Region Local Enterprise Partnership and West Yorkshire Combined Authority note that broadband is a key priority for the City to grow and compete globally. Plan could include policies to strengthen digital infrastructure <p>Transport</p> <ul style="list-style-type: none"> • Roads not able to cope with extra traffic , each site should assess transport demand and resulting environmental damage • Concern over transport infrastructure. • Highways England note concern with extra traffic and need for more infrastructure. • Nether and Upper Poppleton Parish Council and Poppleton Neighbourhood Plan Committee note that in Para 2.15 the second bullet point: the word 'safe' should be inserted between strategic and cycling. Final new bullet point should refer to Park and Ride schemes on the roads from Wigginton and Haxby to the city. • York Cycle Campaign and Cycling UK object to lack of information on cycling in plan and inaccurate approximates of how many extra vehicles on the roads the new houses will generate. • York TUC and York Bus Forum show concern over Transport section being inadequate. • York Bus Forum also notes that there is no clear proposals to provide bus services to serve developments. • Julian Sturdy MP notes concerns on the Outer Ring Road which is already at capacity. • No requirements for the safety of horse riders in the Plan. <p>Infrastructure Delivery and viability</p> <ul style="list-style-type: none"> • Infrastructure overstretched, drainage issues. • (Turley representing Gallagher Estates) Fails to analyse different spatial options for meeting the needs of York, instead appraising individual sites against narrow,
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	<p>environmentally focused criteria. Inconsistency between the spatial distribution of allocated sites and the preferred distribution tested through the 2013 Sustainability Appraisal process.</p> <p>Historic Environment</p> <ul style="list-style-type: none"> • (Turley representing Gallagher Estates) Deficiencies in the heritage and landscape evidential basis for the selection of sites for allocation in the Local Plan; <p>Natural Environment</p> <ul style="list-style-type: none"> • Yorkshire Wildlife Trust note the lack of policy regarding the Lower Derwent Valley. • Wheatlands Woodland should not be designated as an SLI (O'Neill's Assoc obo SBO Land LTD) • Plan needs more weight to protect natural habitats. <p>Open Space</p> <ul style="list-style-type: none"> • Rachel Maskell MP supports mitigation of flooding through creation of more open space. • Cllr Hayes raises concerns about changes to open space designation at Clifford's Tower (motte), noting the Local Government Act 1972. <p>Environmental Quality</p> <ul style="list-style-type: none"> • Queries Plan's approach to reducing congestion and air pollution. <p>Healthcare</p> <ul style="list-style-type: none"> • Health centres full • Mental health care provision is severely limited in York • No plan on how homelessness can be tackled. <p>Environmental Quality</p> <ul style="list-style-type: none"> • Nether and Upper Poppleton Parish Council and the Poppleton Neighbourhood Plan Committee and Rachel Maskell MP are concerned about standing traffic and its impact on air quality, which could be exacerbated with additional housing. • Plan should do more to fulfil One Planet York aspirations • General concerns for city's air quality (noting Transport Topic Paper)
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	<p>General Comments (General approach to Growth / Duty to cooperate / SA / Consultation process)</p> <ul style="list-style-type: none"> • (Environment Agency) Document would be easier to navigate if there was an individual section for each site allocations with associated references. • (York and North Yorkshire Chamber of Commerce) Document could be shortened and policies put into SPDs i.e. Health and Wellbeing, as it does not relate to land use. • Should include paragraph indicating that York is the UK's first Human Rights City. • Evidence base is difficult to find on the website, and some documents are missing, out of date or inaccurate. Should be made available to those without internet access. • (Network Rail) Some commentary is outdated and should be removed. • Notes contradictions across the document - deprivation stats within the spatial portrait are conflicting (para 1.24 vs. para 1.31) re deprivation indices. • Plans do not have long term vision. • (Turley representing Gallagher Estates) Old comments on 2016 plan still apply. No changes have been made. Have a general dissatisfaction with the manner in which the Local Authority has managed this process, as have used dated evidence which has been subject to updates as part of the process but most documents have never been replaced or superseded. • (Barton Wilmore on Behalf of Barratt and David Wilson Homes) It is considered that the Plan can be made sound subject to making reservations to the issues outlined within the representor's representations. <p>Specific sites comments</p> <ul style="list-style-type: none"> • York Civic Trust requests to add reference to the York Central Historic Core Conservation Area Appraisal. • More emphasis on the importance of the Racecourse. • Haxby Station should be reopened. • No vehicle access to Rawcliffe School. Concerned about child safety, proposed development (gym) has already been turned down due to safety issues. • (Haxby Town Council) Experiencing cutbacks in maintenance in Haxby.
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	<p>Education</p> <ul style="list-style-type: none"> • A number of Parish Council's object to the Plan's approach to education and student housing, commenting on the potential for it to impact on existing provision. Note also that Plan should refer to Manor Academy rather than Manor School. <p>Renewables</p> <ul style="list-style-type: none"> • A number of objections were received in relation to wind turbine development at Dunnington/Scoreby due to impact on landscape and residents. • Some concern expressed that the Plan pays only lip service to sustainability. <p>Sustainable Design</p> <ul style="list-style-type: none"> • Home Builders Federation objects to policies seeking to set standards for new buildings on the grounds that obligations should not threaten viability. <p>Flooding and Drainage</p> <ul style="list-style-type: none"> • Flood risk should have its own section in the Local Plan, and current maps are out of date and inaccurate. • Sewage and drainage in York is at capacity. <p>Minerals and Waste</p> <ul style="list-style-type: none"> • North Yorkshire County Council note that the Joint City of York, North Yorkshire and North York Moors Waste and Minerals Local Plan is incorrectly titled. It should be amended to refer to the Minerals and Waste Joint Plan.
<p>Comments</p>	<p>- Duration of the Plan, Green Belt and Safeguarded Land (Principle of Green Belt, Flexible land supply, Green Belt Appraisal)</p> <p>Nether Poppleton Parish Council, Upper Poppleton Parish Council</p>

	<p>and Poppleton Neighbourhood Plan Committee all say that whilst the plan needs to be flexible there are no dates provided in the plan.</p> <p>Osbalwick and Derwent Ward Councillor (Cllr Brooks) stresses that villages must be well separated from new development. Any new access roads for proposed developments must have minimum impact on existing residents and the green belt.</p> <p>Strensall with Towthorpe Neighbourhood Plan Steering Group generally approves of the approach to green belt and spatial strategy.</p> <p>Body Fix Transformation Centre requested the green belt boundary / site status of Clifton Gate Business Park's is changed to leisure use (non green belt).</p> <p>Redrow Homes, Linden Homes, K Hudson and G M Ward Trustees stress the need for clarity regarding the plan period It should be 1st April 2017 to 31st March 2038. Given the lack of safeguarded land, the plan fails to justify the 2038 end date.</p> <p>Campaign to Protect Rural England stress the importance of the local plan setting firm green belt boundaries to protect the city's setting and character.</p> <p>One member of the public commented to say that the plan needs speeding up as politics has directed development toward / away from certain areas, more housing is needed across the city and would welcome central government intervention.</p> <p>Comments note the lack of a green belt review.</p> <p>Julian Sturdy MP notes that, although insufficient brownfield sites are available, this should not necessitate running roughshod over rural communities/green belt.</p> <p>Rachel Maskell MP supports defining the green belt boundary, without risk to delaying the Plan.</p> <p>A number of comments query how the '6 miles from the city centre' green belt boundary is defined.</p> <p>- Housing Growth (including Housing Delivery and the OAHN)</p> <p>Elvington Parish Council does not oppose new development but has never been asked what the village actually needs.</p> <p>York TUC was concerned that the proposed Elvington Airfield Development is not big enough to fund a full range of community</p>
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	<p>facilities to make it self sufficient. It should be larger to help the housing shortfall.</p> <p>Wakeford Properties commented that there is no evidence that sites selected are deliverable or developable when considered against the definitions in national guidance. This failure to set out suitability, availability and achievability means the plan is not justified, sound nor effective. Inclusion of so many large strategic sites will cause a delay to planning and delivery.</p> <p>Westfield Lodge and Yaldara Ltd questioned the reliance on several large strategic sites which require significant infrastructure and the deliverability of a 5 year housing supply. The plan should include a wider range of sites of varying sizes which could come on stream more readily throughout the plan period.</p> <p>A few members of the public commented to say the universities to accommodate more students on campus, however most comments (15-20) were stressing the need for genuinely affordable housing with approximately half of these also specifically mentioning the need for social housing.</p> <p>A few members of the public expressed anger at, or questioned why, the council commissioned the GL Hearn report on housing need only to then ignore the recommendations. Almost all of these went on to say York should be building more housing than is allocated in the plan.</p> <p>One member of the public commented to say there housing target is inadequate, 4000 further homes required, should be built on green belt, not just flats. A couple of others said that housing and infrastructure should be built at existing peripheral settlements instead of whole new settlements and further city centre development.</p> <p>One member of the public supported York Civic Trust's arguments in favour of new settlements that are large enough to become self-sustaining.</p> <p>One member of the public notes that latest figures show UK population is expected to be two million less than when the guidelines for the local plan were set, asks when the plan will be amended to take this into account.</p> <p>- Economic Growth Three developers commented that Paras 1.34 and 4.2 both make reference to jobs growth forecast although it is unclear which forecast has been used to calculate the housing requirement.</p> <p>York Racecourse felt there should be more focus on the racecourse</p>
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	<p>throughout the plan to reflect it's economic and tourism value.</p> <p>Jennifer Hubbard Town Planning Consultant comments that given the residual approach to the Green Belt, the Plan provides very few opportunities for rural / land based businesses to become established or expand. The problem is compounded by the opportunities which now exist under PD rights to convert many agricultural buildings to up to 3 dwellings and convert office premises to dwellings, due to financial reasons. See also para 28 of NPPF.</p> <p>- Transport</p> <p>Highways England point out that their comments build on previous responses to Local Plan Preferred Options stage in 2013 and Preferred Sites Consultation in 2016 and are set in the context of Department for Transport Circular 02/2013. The list of supporting documents includes a Transport Topic Paper that is mainly devoted to modelling issues, but there is no link to and infrastructure Delivery plan (IDP) or similar document which HE would normally look to identify any potential requirements for the SRN. HE would like to have an input to the updating of the IDP (produced in 2013) before full Publication Draft consultation.</p> <p>Holtby Parish Council notes that although no new building is planned for Holtby, the impact of development in Stamford Bridge area could increase the volume of traffic through the village. Concerns over the current flows of traffic and road safety should be noted and funded accordingly.</p> <p>A few members of the public commented on the need for regular and affordable public transport for both new and existing developments.</p> <p>A few members of the public commented on dangers existing / additional congestion causes for emergency services, one of which was an on-call doctor who currently has difficulty reaching the hospital from Haxby / Wigginton and is concerned this will be made worse in future. Wigginton Parish Council notes there is no off street parking or safe cycle routes.</p> <p>A few members of the public stressed that York should be more ambitious in terms of sustainable transport and have a stronger "green" vision for York generally (renewable energy, open space, tree planting etc.)</p> <p>Almost all comments on transport in and around Haxby were supportive of a train station but many doubted it would come to fruition and had concerns about where parking would be provided.</p>
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	<p>One member of the public suggested that an integrated bus / train transport interchange should be built at the York Central site.</p> <p>One member of the public raised the issue of the plan not seeming to include the 3,000 homes at Cattal being proposed by Harrogate Council, which would affect transport coming into York from the west.</p> <p>North Yorkshire County Council has produced a Strategic Transport Prospectus for North Yorkshire and the Strategic Transport Priorities for it.</p> <p>Heslington Parish Council asks for cumulative traffic flow to be analysed across the developments.</p> <p>Nether and Upper Poppleton feels sustainable modes of transport need to be defined.</p> <p>York Green Party notes buses should be affordable and reliable. Julian Sturdy MP comments that York's future housing need must be provided with effective road and community infrastructure.</p> <p>Network Rail comments on the increased potential for rail usage.</p> <p>- Infrastructure Delivery and viability</p> <p>York, North Yorkshire and East Riding LEP welcome early discussions regarding schemes where external funding (through Local Growth Fund or HCA initiative for example) is likely to be required.</p> <p>National Grid has three assets within City of York Council's administrative area (shown on a plan ET136 submitted as Appendix 1.) To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect its assets. National Grid prefers that buildings are not built directly beneath its overhead lines. National Grid must be consulted on any Development Plan Document (DPD) or site-specific proposals that could affect its infrastructure.</p> <p>York and North Yorkshire Chamber of Commerce are concerned that there will not be enough funding to meet the full development needs of the City.</p> <p>York TUC are concerned that community facilities promised in master plans and planning briefs are not delivered and can lead to unbalanced communities, provision of such facilities should be</p>
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<p>protected by the Local Plan - provision remote from the communities these served is unacceptable. It is important that brown field site developments contribute their share of new green space including play and sports facilities and address specific shortfalls to ensure quality environments.</p> <p>The majority of general comments from members of the public were concerns around additional strain being put on infrastructure that is struggling to cope at present; there were around 30 comments of this nature (roads – congestion, safety and air quality; doctors; schools; parking, drainage/sewage and open space for recreation).</p> <p>Integrated Built Environment Ltd suggest that the plan should address the concerns of local residents to the impact a new development may bring.</p> <p>The HCA is concerned by the level of information that developers are being asked to provide to support planning applications by these policies [HW1 to HW7 and ED6]. It may delay development.</p> <p>- Historic Environment</p> <p>One member of the public stressed the importance of keeping listed buildings in use so they do not become derelict and making sure that any new development is in-keeping with character of the city.</p> <p>NYCC note that the Plan is overly focused on the urban areas.</p> <p>York Civic Trust notes that the Plan should make more reference to statutory and non-statutory consultees.</p> <p>More reference should be made of Acomb, particularly in the context of the emerging Neighbourhood Forum.</p> <p>Open Space</p> <p>Wigginton Parish Council notes the need for more open space incl sports playing area facilities and allotments.</p> <p>Sport England – potential allocations must be consistent with Sport England’s Playing Fields Policy</p> <p>A number of respondents, including the NFU request clarification on definitions of open space.</p> <p>A further number of comments note the importance of open space and the need for additional provision.</p> <p>- Flooding and Drainage</p>

	<p>Dunnington Parish Council is opposed to developments in back gardens which add to the surface water problems in the village and change the character of the village.</p> <p>The Environment Agency (EA) is keen to develop the York Urban Becks Project.</p> <p>Nether and Upper Poppleton Parish Council, Poppleton Neighbourhood Plan Committee and NFU suggest avoiding the use of flood plain areas for development.</p> <p>Wigginton Parish council note concerns about the sewage and drainage management in Haxby and Wigginton.</p> <p>NFU suggest consideration should be given to infiltrate surface water into the ground wherever possible, followed by discharge into an open watercourse.</p> <p>Rachael Maskell MP notes the flooding issues facing York are made worse by intense development.</p> <p>- Healthcare</p> <p>York Natural Environment Trust were disappointed by one single mention of disability (in the Housing Section) is provided in the entire document. Given much of 'old' York has access problems guidance on the provision and design of accessible new buildings and public spaces should be added.</p> <p>NHS Vale of York Clinical Commissioning Group would expect to be consulted at an early state on new major housing sites.</p> <p>Wigginton Parish Council note healthcare (doctor and dentist) provision in Haxby and Wigginton is nearing capacity.</p> <p>- Minerals and Waste (including Fracking)</p> <p>Two members of the public commented to say that residents concerns / opposition to fracking must be listened to.</p> <p>Wigginton Parish Council notes existing waste sites will struggle to cope with increased demand, and consider the impact of Fracking upon York.</p> <p>- Natural Environment</p> <p>York Environment Forum and Treemendous both note a lack of tree data and no tree strategy in the green infrastructure section. Feels</p>
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	<p>the natural environment will not be protected until there is a Green Infrastructure Strategy in place.</p> <p>Campaign to Protect Rural England stress the importance of green corridors linking the urban centre to the countryside.</p> <p>North Yorkshire County Council note the potential for cross-boundary working on biodiversity issues.</p> <p>York Natural Environment Trust Ltd state that CYC has a poor history of enforcing planning constraints, and that this should be rectified.</p> <p>NFU notes that agriculture continues to be a key component of our local economy.</p> <p>One comment questions the boundary of Darnhill Woods included as an SLI</p> <p>A comments notes potential of development to impact on the setting of Heslington.</p> <p>The Plan should do more to protect biodiversity and tree cover.</p> <p>- Open Space</p> <p>Quite a few members of the public commented on the importance of protection / provision of open / green space for well-being and recreational uses. The vast majority of these comments were made in reference to the YSJ playing fields off Hull Road or Old Manor School. A few mentioned the land at Walmgate Bar.</p> <p>- General Comments (General approach to Growth / Duty to cooperate / SA / Consultation process)</p> <p>Julian Sturdy MP stressed the importance of close co-operation on issues that will have impacts on neighbouring authorities, particularly transport. Also said that consultation responses must be considered before final submission.</p> <p>Historic England comment that the Proposals map should show the precise boundaries of each Conservation Area, the Area of Archaeological Importance and boundaries of each Scheduled Monument. Map identifies general location of scheduled ancient monuments, incorrectly shown in the key as 'Areas of Archaeological Importance'.</p> <p>Network Rail commented that some of the commentary in the plan is outdated and needs re-writing.</p> <p>National Railway Museum and York Central Partnership both</p>
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<p>queried why the Proposals Map features a number of very small “open spaces” at the York Central site.</p> <p>York and North Yorkshire Chamber of Commerce comment that the documents should be accessible and easy to read; currently they are lengthy and intimidating for people who are not accustomed to planning.</p> <p>Skelton Village Trust said that once estimated capacity requirement over the timescale of the plan is established then a coasted commitment to meet that requirement before or in line with the growth in demand should be mandatory.</p> <p>Wheldrake Parish Council supports the manifesto of the York Action Group Alliance (YAGA) which supports the outer Parishes of York.</p> <p>British Sugar notes that the Proposals Map includes an annotation to the north of Site ST1 identifying a potential new bridge/ enhancement across the Harrogate rail line, this is not objected to out-right but it has been previously agreed that this is not a requirement of the British Sugar development.</p> <p>A few members of the public commented to say the overall plan and evidence base needed to be more reader-friendly, maps were low resolution and colours hard to distinguish. There was also one person comment that splitting the city up into areas in the OurCity publication made the city unrecognisable and impossible to understand.</p> <p>Two members of the public highlighted misleading information around whether previous comments are being taken into consideration or not.</p> <p>One member of the public two queries about the proposals map – 1) Nether Poppleton and York Business Park - is the nature area shown on the wrong side of the road, Minster Way? 2) At York Business Park and British Sugar does the map depict 2 new rail halts with a bridge linking the two? This could be made clearer.</p> <p>One member of the public commented that the evidence base which should support the local plan is not easy to find on the website - there is no single list and it appears that some documents are missing or out of date.</p> <p>One member of the public highlighted confusion / contradictory information around a proposed access road to ST9 via Moor Lane.</p> <p>One member of the public questioned priorities behind the plan, saying it is based on the avoidance of antagonising those who want to preserve their privileged outlook in peripheral settlements.</p>
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	<p>One member of the public said policies should be formulated more through proactive consultation with residents via neighbourhood forums / parish councils and meeting with councillors.</p> <p>- Misc.</p> <p>York Campaign For Real Ale (CAMRA) submitted a detailed suggestion for a Pub Protection Policy to be incorporated into the Local Plan. 6 pages in length, refers to NPPF and existing legislation.</p> <p>York: Human Rights City commented that the plan was a missed opportunity to promote the human rights city platform / commitment. Suggested a more positive statement about duty towards Gypsy / Traveller residents and suggested a statement about Human Rights City in the Local Strategic Context Background.</p> <p>Wigginton Parish Council says more facilities are needed in Haxby and Wigginton village specifically mentions a Citizens Advice Bureau. Asks for a skate park, dedicated police presence to maintain low crime rates, the fire station at Earswick to be manned at all times, more money to be spent on maintenance of parks / trees / roads.</p> <p>York Travellers Trust say that under Local Strategic Context an additional paragraph is needed indicating that York is the UK's first Human Rights City, and confirming that the principles of the Universal Declaration of Human Rights underpin the plan.</p> <p>One member of the public asked what provisions are being made for homeless people in York and interventions to stop the problem from evolving.</p> <p>One member of the public mentioned the importance of public toilets for the elderly and people with health conditions, without public toilets these groups may not feel comfortable leaving the house which will lead to isolation and ill-health.</p> <p>A few members of the public suggested using small, local contractors for development work.</p> <p>One member of the public thought the plan should be put on hold until Brexit is complete.</p> <p>Housing density</p> <p>A number of developers comment on the Plan's approach to housing density, stating that build out rates are not robust or realistic. Rachel Maskell MP comments that brownfield urban</p>
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	<p>densities are too high, to the detriment of York's environment.</p> <p>Education</p> <p>The HCA comments on the potential for the plan's 'disproportionate' requirements in support of planning applications to impact on deliverability; this may delay or deter successful applications from coming forward.</p> <p>ESFA ask that they are included early in discussions around site allocations, to influence the Infrastructure Delivery Plan.</p> <p>A number of Parish Councils query how predicted student numbers have been calculated.</p> <p>CPRE are in general supportive of the Plan's approach to education provision.</p> <p>Sustainability/renewable</p> <p>All new housing should be built to the highest environmental standards (Rachel Maskell MP/York TUC)</p>
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6.0 Conclusions and next steps

The Local Plan will be the development plan for York over the 15 years from 2018-2033. It will include a vision for the future development of the City and a spatial strategy, and will cover both strategic policies and allocations, alongside detailed development management policies. The preparation of the Local Plan follows on from the previous Local Development Framework process, Local Plan Preferred Options consultation (2013), Further Sites Consultation (2014) and Preferred Sites consultation (2016).

Consultation comments received as part of the previous consultation stages, alongside further technical work, will be used to help develop the emerging local plan. The next formal stage of consultation (Publication) will accord with legislation as set out in the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Development) (England) Regulations 2012. The legislation states that a local planning authority must only submit a plan for examination which it considers to be sound. This is defined by the National Planning Policy Framework as being:

- **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.

Please refer to the current Local Development Scheme for further detail of the emerging Plan's timetable.

Annex A Copy of Comments Form

City of York Local Plan

	Local Plan Pre-Publication draft (Regulation 18 Consultation, Sept 2017) Comments Form
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Responses on this form should only relate to the sites, policies and information set out in the Pre Publication draft Consultation documents. We will seek your views on the Publication Local Plan early in 2018. Comments made on previous stages of the Plan will be taken into account.

We will use the information you provide us with to inform the next stage of the Local Plan and a summary of your comments will be published. A full copy of your comments (excluding personal information) will also be placed on the Council's website. Any personal information provided will be kept in accordance with the Data Protection Act 1998. If the Council is asked an enquiry under the Freedom of Information Act or the Environmental Information Regulations then we will only disclose information we have been provided with in accordance with the relevant legislation.

- **All responses should be returned by midnight on Monday 30th October 2017 so that we can take your views into account.**
- **Please complete a separate form for each issue and/or site/s you are commenting upon.**

Please **complete all sections** of the form in **BLOCK CAPITALS**. It's important that you complete **section 3 consent**

SECTION 1: YOUR PERSONAL and CONTACT DETAILS			
Name			
Organisation <i>(if relevant)</i>			
Representing <i>(if relevant)</i>			
Address			
	Postcode		
Telephone			
Email			
Signature		Date	

SECTION 2: YOUR COMMENTS					
Site/Policy reference					
Page number (please specify which document e.g. main document or which supporting document when stating page number)					
Objection		Support		General Comment	
<p>Comments</p> <p>Please continue on a separate sheet if necessary, noting the document/page/site/policy reference to which you are responding.</p>					
SECTION 3: CONSENT – PLEASE COMPLETE					
<p>Please tick this box if you consent to the council using your information as stated above. We will be unable to use the information you give us without your consent.</p>					
<p>I do give permission for the City of York Council to contact me with information on the further stages of the Local Plan production and other planning policy documents for York (Please tick)</p>					

To find out more about what the Council does with your personal information, www.york.gov.uk/privacy

If you have any queries, please contact us:
 Tel: (01904) 552255
 E-mail: localplan@york.gov.uk

Please return completed forms (no stamp required) to:
 FREEPOST RTEG-TYYU-KLTZ
 Local Plan
 City of York Council
 West Offices
 Station Rise
 York
 YO1 6GA

Deadline midnight 30th October 2017

How did you hear about this consultation?

Do you have any general comments on this consultation process?

Annex B: Copy of Consultation Letters



Economy and Place Directorate

West Offices
Station Rise
York YO1 6GA

18th September 2017

Dear Sir/Madam

**City of York Local Plan Pre-Publication draft
(Regulation 18 Consultation, Sept 2017)**

I am writing to inform you about the opportunity to comment on the 'Local Plan Pre-Publication draft (Regulation 18 Consultation, Sept 2017) document.

The emerging Local Plan aims to support the city's economic growth, provide much needed housing and help shape future development over the next 15-years (2012 – 2032) and beyond by balancing the need for housing and employment growth with protecting York's unique natural and built environment. You may be aware that the Local Plan has been prepared over a number of stages. Previous consultation has taken place on Preferred Options (2013), Further Sites Consultation (2014) and Preferred Sites Consultation (2016) which you may have been involved with.

This Pre-Publication stage of the Local Plan presents updated policies on a range of issues including economy, retail, housing, community facilities, education, design, open space, nature conservation, heritage, Green Belt, climate change, flood risk, minerals and waste, transport and communications. The Plan also presents updated evidence in relation to both housing and employment growth and a revised portfolio of sites to meet that growth based on further technical assessment. It draws on the previous stages of consultation and technical work undertaken to support the Local Plan.

Your views on the Pre-Publication draft (2017) document are sought. The purpose of the consultation is to enable the public and other interested parties to comment on policies and sites in the context of a full draft Local Plan. Any representations made will then be taken into consideration in drafting the next stage of the plan, the Publication Draft.

The consultation period for the Local Plan Pre Publication draft (2017) document starts on **Monday 18th September 2017**. All consultation material will be live on the Council's website (www.york.gov.uk/localplan) and available in libraries from this date.

Corporate Director Economy and Place: Neil Ferris

www.york.gov.uk

Responses must be received by **midnight on 30th October 2017** and should be made on a representation form. Response forms are available on the Council's website (www.york.gov.uk/localplan) or are available from the Council's West Offices reception or from your local library. Alternatively look out for a special edition of the council's newsletter [Our City](#), which provides lots of ways you can feedback during the consultation, including a freepost address.

In addition drop-in sessions will be held across the city. At these sessions you will be able to view the documents, speak to officers and pick up a response form.

- Monday 2nd October at Strensall & Towthorpe Village Hall, Strensall (3pm-7:30pm)
- Wednesday 4th October at Fulford Social Hall, Fulford (3pm-7:30pm)
- Thursday 5th October at Clifton Library, Clifton (3pm-7pm)
- Monday 9th October at Tang Hall Library, Tang Hall (3pm-7:30pm)
- Wednesday 11th October at West Offices, York City Centre (3pm-7:30pm)
- Monday 16th October at Acomb Explore Library, Acomb (3pm-7:30pm)
- Tuesday 17th October at York Sport, Heslington (3pm-7:30pm)
- Wednesday 18th October at Oaken Grove Community Centre, Haxby (3pm-7pm)

Responses to this consultation should only relate to the sites, policies and/or information set out in the Pre-Publication draft (2017) consultation document or associated supporting documents.

We will use the information you provide us to inform the next stage of the Local Plan and a summary of your comments will be published. A full copy of your comments (excluding personal information) will also be placed on the Council's website. Any personal information provided will be kept in accordance with the Data Protection Act 1998. If the Council is asked an enquiry under the Freedom of Information Act or the Environmental Information Regulations then we will only disclose information we have been provided with in accordance with the relevant legislation.

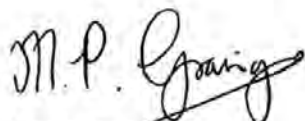
All the consultation documents and further evidence base documents published at previous rounds of consultation will also be available on the Council's website at www.york.gov.uk/localplan from 18th September 2017.

Following this consultation a Publication Local Plan will be prepared for consultation in early 2018 and submission.

If you require any further information on the consultation please contact Strategic Planning at localplan@york.gov.uk or on (01904) 552255.

We look forward to receiving your comments.

Yours faithfully



Martin Grainger
Head of Strategic Planning



Economy and Place Directorate

West Offices
Station Rise
York YO1 6GA

15th September 2017

Dear xxx,

**City of York Local Plan Pre-Publication draft
(Regulation 18 Consultation, Sept 2017)**

I am writing to inform you about the opportunity to comment on the 'Local Plan Pre-Publication draft (Regulation 18 Consultation, Sept 2017) document.

The emerging Local Plan aims to support the city's economic growth, provide much needed housing and help shape future development over the next 15-years (2012 – 2032) and beyond by balancing the need for housing and employment growth with protecting York's unique natural and built environment. You may be aware that the Local Plan has been prepared over a number of stages. Previous consultation has taken place on Preferred Options (2013), Further Sites Consultation (2014) and Preferred Sites Consultation (2016) which you may have been involved with.

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Offices reception or from your local library. Alternatively look out for a special edition of the council's newsletter [Our City](#), which provides lots of ways you can feedback during the consultation, including a freepost address.

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- Wednesday 18th October at Oaken Grove Community Centre, Haxby (3pm-7pm)

Responses to this consultation should only relate to the sites, policies and/or information set out in the Pre-Publication draft (2017) consultation document or associated supporting documents.

Please find enclosed a copy of the Pre-Publication Draft Local Plan (2017) consultation document and proposals maps (north/south/city centre inset), on which we are seeking your views and a representation form on which to submit your comments. All the supporting documents including the Sustainability Appraisal and Strategic Environmental Assessment can be viewed at the reception at the Council's West Offices and online at www.york.gov.uk/localplan.

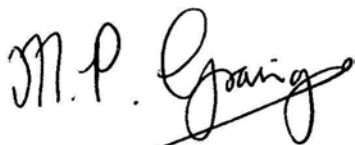
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Following this consultation a Publication Local Plan will be prepared for consultation in early 2018 and submission.

If you require any further information on the consultation please contact Strategic Planning at localplan@york.gov.uk or on (01904) 552255.

We look forward to receiving your comments.

Yours faithfully



Martin Grainger
Head of Strategic Planning

Enc:

- City of York Local Plan Pre-Publication draft (Regulation 18 Consultation, Sept 2017)
- Proposals maps (north/south/city centre inset)
- Response form