

York Local Plan Preferred Options – Summary Of Responses
Section 9: Retail

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
General	Support – agree with the preferred approach to retail	59/12642	Dunnington Parish Council
	Objection - Strensall is described as having a Neighbourhood Parade of retail outlets but heading into the village from the south the only retail establishments are: At the junction of Strensall Road/York Road - Petrol Filling Station with Londis convenience store, Chinese Takeaway, Empty former Ladies Hairdresser, Six Bells Public House. On Barley Rise – Costcutter, Tanning Salon, Butcher, Dentist with a Ladies and Gentlemen’s Hairdresser above. In The Village – Gentleman’s Barber and Ladies Hairdresser, Garage Workshop, The Half Moon Public House, Fish and Chip shop, Branch of City of York Council Library, The Ship Inn, Boots Pharmacy, Tesco Express, Empty former Delicatessen (premises for sale) and Strensall Post Office. The imagination is stretched to call any of these separated locations a Neighbourhood Parade.	77/12764	Strensall with Towthorpe Parish Council
	Comment – McArthur Glen is keen to promote a retail training academy at the Designer Outlet as part of its ongoing training programme, reflecting the York Economic Strategy. Reference to the Designer Outlet as strategic employment location should include reference to this retail training academy.	244/14142	McArthur Glen Designer Outlet
	Comment – would like to see further explanation of how the impact of vitality and viability will be measured as it is important to define what makes York City centre successful and where threats lie to its vitality and viability. Those key elements that require protection should be made explicit whilst general points of principle should be set out to define vitality and viability. Also considered that changes of use from retail to restaurants, bars and takeaways should be more tightly controlled.	1592/17600	York Civic Trust
	Comment –large retail enterprises are valuable as income generators and employers but difficult to attract and tending to force out more specialist local retailers. Do we need more bargain shops; Clifton Moor has four large ones already. There is a danger of a ‘race to the bottom’ in the policy of seeking to increase the number and distribution of multiple stores, thereby destroying urban character, the proliferation of Tesco and Sainsbury neighbourhood stores has shown this elsewhere. Already class brands are leaving the city for the Designer Outlet. If more cheap brand retailers (and pubs, bookmakers etc) flood the centre the much valued attractiveness of the centre will be destroyed. The deficiency of large footplate stores is debateable. There are large retail parks, more out of centre floorspace is no longer needed but that does not mean it should be replicated in type, scale or appearance in the city centre. The only area in need of urban renewal in the city centre is Piccadilly which has been allowed to	2416/6600	

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	deteriorate for more than 30 years.		
General Continued	Support – difficult to comment but generally supportive.	3356/8568	
	Support – agree with the preferred approach to retail centres to provide local level policy to guide retail development and protect retail centres’ function, vitality and viability.	6508/17667	City Of York Council Conservative Group
Policy R1 Retail Hierarchy	Support – the county council supports the policy thrust to safeguard and promote the retail vitality of the city centre.	11/11677	North Yorkshire County Council
	Support – pleased at recognition given to importance of and need to promote the city centre and restrict developments in out of centre locations. Support protection for existing neighbourhood centres and local parades.	192/13997	
	Comment – York Designer Outlet performs a specialist retail role within a multi layered retail offer within York. The plan recognises its specialist retail role, but fails to distinguish the outlet sufficiently well as providing a different retail offer from other out of centre retail developments.	244/14137	McArthur Glen Designer Outlet
	Objection – Monks Cross Shopping Park should be explicitly acknowledged in the retail hierarchy. City centre is physically constrained by significant heritage assets. Owners of Castle Piccadilly have confirmed that the scheme is no longer viable for retail expansion. Therefore the foundation of the plan’s strategy is unfounded and out of centre locations should be given appropriate consideration in the spatial approach of the plan, especially given the lack of any sequentially preferable sites. Preference should be given to accessible sites that are well connected to the town centre. In order to compete with other town centre retail schemes, the plan should provide flexibility to support development proposals within sustainable locations which fall outside of established centres. Monks Cross Shopping Park is complementary to the city centre and is an appropriate location for large format retailers to locate which cannot be accommodated for in the city centre. The park is in a highly sustainable location, benefitting from excellent accessibility by all modes of transport.	331/14185	Monks Cross Shopping Park Trust
	Objection – do not accept the preferred approach, there has been too much development outside of the city centre, thus encouraging unsustainable traffic growth. Favour alternative 2 – to review the hierarchy to include Monks Cross and Clifton Moor.	433/16558	
	Objection – concerned that retail provision within the former British Sugar site will not be viable because of restricted accessibility and lack of main road frontage. Object to the specific location of the potential new retail hub within the former British Sugar site on this basis. The most appropriate location for facilities should not be pre-judged and should be determined through the comprehensive master-planning exercise.	434/16595	Associated British Foods plc

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Policy R1 Retail Hierarchy Continued	Support – See response 11	737/16881	
		796/16892	
	Objection - Halifax Estates does not object to the principle of the Local Plan including a retail hierarchy and supports the strategy that York City Centre is afforded the highest position within the hierarchy, followed by district and local centres. However, objects to the reference that the Strategic Allocations are likely to only include local centres. Whinthorpe has been allocated some 4,680 dwellings to be delivered during the Local Plan process, a strategy which is supported by Halifax Estates. However, there is concern that a local centre would not necessarily be sufficient to support the scale of development proposed at Whinthorpe. Therefore to create a truly sustainable community, on a scale which is not disproportionate to Haxby, Halifax Estates believes that Whinthorpe should be afforded district centre status within the retail hierarchy. Would therefore recommend that the Council includes Whinthorpe in the second bullet point of Policy R1, to reflect the aspiration to create a district centre to support the new community.	1337/17284	Halifax Estates
	Support – generally agree with the preferred approach in Policy R1.	1592/17596	York Civic Trust
	Objection – the boundary depicting the centre of the village should be extended to encompass the whole area of the village green and surrounding property, as this properly represents the centre of the village. The loss of this part of the green and loss of the woodland bordering the green, will undermine the linkage of these spaces and create a loss of facility and amenity to the village.	1599/9931	
	Support – retail hierarchy policy but do not feel that York needs to compete as a retail destination with other larger cities. Any attempt to do so would harm the special qualities that the plan seeks to protect and enhance.	1665/12947	York Environment Forum
	Objection – the key area of Hopgrove that should actually form part of the village centre is the public house and hotel, which is axiomatic, presume that this has been excluded in error. Land to the rear of the public house and hotel, a section of which fronts onto Hopgrove Lane South and is adjacent to the village centre, could potentially be developed to provide additional village services over the life of the plan.	1672/15051	Mitchells & Butlers PLC
	Support – See response 11	2124/6512	
		2521/6806	
	Comment – As a population we consume too much, need less consumption of raw materials and energy making things that are neither necessary nor essential. Too much retail space is devoted to cheap, poorly made goods that do not last and are soon thrown away.	3151/8121	

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Policy R1 Retail Hierarchy Continued	Comment – good vitality and viability of the city centre is crucial to the health and prosperous future of the city. Please ensure the policy requirements are adhered to.	3181/8181	
	Support – see response 11. Too much out of town centres.	3246/8327	
	Comment – concentrate on filling the empty shops in the city centre. Not everyone walks to the shops at large characterless out of town shops. York’s small individual shops make it unique. York shouldn’t regarded as an out of town shopping experience.	3729/10046	
	Support – see response 11	3737/10082	
	Objection – see response 11	3884/10426	
	Comment – unless something is done to make it easier to park and so use the city centre it will die i.e. no shops just cafes. Cheaper parking would help considerably. Park & Ride is not a complete answer and the bus service is virtually unreliable.	4490/11511	
	Support – see response 11	4651/11780	
		4652/11786	
	Objection – see response 11	4653/11792	
	Support – see response 11	4654/11798	
		4655/11804	
		4656/11810	
		4657/11816	
		4658/11822	
		4660/11834	
		4661/11840	
		4662/11846	
		4663/11852	
		4664/11864	
		4665/11858	
		4666/11869	
		4667/11875	
		4668/11881	
		4669/11887	
	4670/11892		
	4672/11901		
	4673/11907		
	4675/11918		
	4676/11924		

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Policy R1 Retail Hierarchy Continued	Support – see response 11	4677/11930	
		4678/11936	
		4679/11942	
		4680/11948	
		4682/11961	
		4683/11967	
	Objection – see response 11	4684/11973	
	Objection – Clifton Moor Retail Park (incorporating Q Leisure Park) should be designated within the retail hierarchy as a District Centre. This would address the lack of designated centre in this area of York and provide an appropriate location to meet the needs of the existing residential population and proposed population to be forthcoming under allocation ST14.	5163/12454	USS
	Support – agree with the preferred approach	5178/12340	
	Comment – Haxby shopping centre could be improved but not enlarged. It just about supports the community but would struggle if there were any further housing developments.	5851/15097	
	Support – see response 11	6064/15520	
		6065/15526	
	Support – support the scope for additional local convenience and retail provision required to support the provision for local day to day shopping needs to support the development of new local centres within some of the strategic allocations. Also support opportunities to maintain and enhance existing local centres and the provision of additional local centres to enhance the sustainability of new communities and strategic allocations. Support the scope for additional food store provision arising from proposed population growth and to allocate distinct/local centres for local provision. Support the evidence set out in The Retail Study (2008) and the Core Strategy Retail Supporting Paper (2011) which have identified the need for more food store provision in the City Centre and the City of York Economic and Retail Growth and Visioning Study (2013) which identifies that the food and grocery sector is expected to continue to grow over the plan period. Noted however that there is a need for the Council to undertake a more detailed assessment of the food retail capacity arising from the anticipated growth and the requirements for further main food store provision in the City. It is considered that there is scope for further superstore provision, in stores in the region of 5000 sqm sales areas, to meet customer requirements, enhance customer choice and encourage a competitive and vibrant retail sector.	6159/15657	Pegasus Group

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	Comment – National Planning Policy Framework paragraph 23 identifies the need for Local Planning Authorities to undertake an assessment of the need to expand town centres to secure significant supply of suitable sites. The Council’s ‘Economic and Retail Growth Analysis and Visioning Work’ (2013) provides insufficient evidence that the increased requirements for convenience goods provision has been fully assessed.		
Policy R1 Retail Hierarchy Continued	Objection – the policy of extending out of town sites as in recent Monks Cross expansion is bad for city centre business, the environment and traffic flow (ring road, villages).	6179/15712	
	Support – agree with the approach but should go further to pedestrianise the centre and improve the cleanliness; creating areas like the "cultural quarter". The fact that Leeds has a large new urban shopping centre does not mean we need one to compete. The out of town centres do seem to work.	6213/15749	
	Support – agree with the aim to maintain and enhance the viability of the city centre and local centres and that out of town shopping centre development needs to be carefully controlled.	6307/15949	
	Comment – accepted by the Council that Monks Cross is an accessible location. Considered that its allocation as a district centre within the retail hierarchy would recognise the ‘de facto’ position. Detailed analysis in representation.	6334/15998	Smith & Ball LLP
	Support – see response 11	6505/16255	
	Support – agree with the preferred approach to retain existing retail centre hierarchy but consider that the Council have already undermined the hierarchy by the new ‘destination shopping’ transformation of monks cross as witnessed by the cancelling of Coppergate 2.	6506/16261	City Of York Council Conservative Group
	Support – the preferred approach to the existing retail centre hierarchy remains correct and desirable. Comment – the plan is weak in terms of how the hierarchy will be achieved and needs to be strengthened.	6508/17666	York Green Party
	Support – agree with the retail hierarchy but feel that Monks Cross 2 has already undermined this as demonstrated by the recent withdrawal of plans in Castle Piccadilly.	6518/16383	Cllr Jenny Brooks

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Policy R2 District Centres, Local Centres And Neighbourhood Parade	Objection – there should be a policy to protect existing community facilities and access to them including local shops.	62/12708	Fulford Parish Council
	Objection - Policy R2 should state that retail developments will be considered acceptable in principle provided that 'it is environmentally sustainable in the context of climate change'.	90/12829	Friends of the Earth (York and Ryedale)
	Objection – welcome the first bullet point of the policy but believe it should be strengthened to the following: 'consolidates, maintains or improves upon the function, vitality and viability of the centre in relation to both its retail and its cultural and community facilities'.	178/13898	York Council for Voluntary Service
	Comment – smaller type supermarkets harm central stores and also sell alcohol and there is a serious problem with than in the city centre.	679/16860	
	Comment – the plan should include development of existing community centres which would be able to provide for residents and reduce pressures of city centre shops and travelling for shopping.	703/17055	
	Support - welcome the recognition in Policy R2 and paragraph 9.5 that local convenience and retail provision will be required to support the local day-to-day shopping needs of some of the Strategic Sites including Clifton Gate. Aspirations are for Clifton Gate to be a self- sustaining settlement, with the level of retail provision being determined and evidenced through the masterplanning process.	1523/17498	Commercial Estates Group, Hallam Land Management & T W Fields Ltd
	Support – generally agree with the preferred approach in Policy R2.	1592/17597	York Civic Trust
	Comment – policy should protect district centres, local centres and neighbourhood parades from being taken over by supermarkets and other chain stores.	1665/12948	York Environment Forum
	Support – very pleased to see protection for Bishopthorpe Road shops	2663/7053	
	Support – agree with the preferred approach	5178/12341	
	Comment - the retail facilities in Strensall are limited by the being split in to two small areas, the result of myopic, short-term, housing-focussed priorities. There has never been a plan for Strensall to develop its retail outlets and the Council has stifled any possibility by its inattention to infrastructure planning. The Council has robbed Strensall of the possibility of developing a centre through developing site H32 as housing.	5189/12405	
	Support – pleased to see that Haxby has been designed as a local centre.	5865/15134	St Mary's Parochial Church Council
	Support – the preferred approach to the retail centre hierarchy remains correct and desirable. Comment – the plan is weak in terms of how the hierarchy will be achieved and needs	6518/16384	York Green Party

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	to be strengthened.		
Paragraph 9.05	Objection – Clifton Moor Retail Park (incorporating Q Leisure Park) should be designated as a District Centre. This would address the lack of designated centre in this area of York and provide an appropriate location to meet the needs of the existing residential population and proposed population to be forthcoming under allocation ST14.	5163/12906	USS
Policy R3 York City Centre Retail	Objection – development of Monks Cross and the resultant withdrawal of the developer from the castle Piccadilly scheme makes the retail development on the west bank of the Foss redundant, reducing the estimated floor space provision. Allocation ST20 should be revised to Piccadilly only. This should also be reflected in paragraph 9.18.	103/12862	York Tomorrow
	Objection – amend third bullet to read: ‘the reuse and development of existing units (with the advice of specialist conservation officers) to create additional floorspace...’	188/13945	
	Comment – it is extremely important to ‘manage the provision of parking...to ensure it supports the vitality of the city centre.’ Parking is a key issue for the centre, faced with the free and ample parking provided by out of town competitors.	192/13999	
	Comment – support third and final bullet points of the policy. First bullet point should include a clear statement that a masterplan will be developed for the castle Piccadilly area and that piecemeal development which would be likely to prejudice the development and realisation of a comprehensive scheme for the area will not be permitted. It is essential that the area is developed comprehensively due to the sensitivity of the area and the number of potential constraints upon the scale, form and design of any development.	238/14069	English Heritage
	Objection – York Designer Outlet supports the city centre, acting as a tourist attraction and as a catalyst for drawing visitors and expenditure into the City of York. In this respect the outlet helps to support the city centre – it reinforces, rather than competes with, the city centre specialist retail offer.	244/14138	McArthur Glen Designer Outlet
	Support – generally agree with the preferred approach in Policy R3.	1592/17598	York Civic Trust
	Comment – policy is broadly supported, however retail should be one element of city centre development, as the nature of shopping changes. Need no more supermarkets in the city centre.	1665/12949	York Environment Forum
	Support – support for Newgate Market and paragraph 9.21. It needs to be advertised more within the city centre because tourists don’t know where it is. If something is not done the market will die. The market is a very important part of York’s history for past and future. Could make the market look trendier for all ages. Should be able to trade in Parliament Street, not just on a Monday.	2654/7030	

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Policy R3 York City Centre Retail	Support – agree that the city centre should be safeguarded against further retail developments outside the city. Agree that the Castle Piccadilly site should be developed for retail use.	4810/12120	
	Support - Policy R3 supports additional retail provision on key edge of centre frontages. Additionally main town centre uses in these locations are supported. Such support is welcomed particularly in relation to the area of the Hungate site adjacent the Stonebow.	5167/12901	Hungate (York) Regeneration Ltd
	Support – agree with the preferred approach	5178/12343	
	Comment – having witnessed the decline in offer at Newgate Market and the decline in ‘useful’ city centre shops (butchers, bike shops, bookshops etc) the city centre will need active encouragement and promotion to survive.	5222/12490	
	Comment – there needs to be a good balance between city centre retail provision catering for tourists and visitors as well as local residents and good convenient out of town retail provision as well.	5427/14738	
	Comment – lots of good statements about the need for good quality shops, why does the council put it at risk by permitting more major chain coffee shops when there are far too many already, allowing retail premises to be changed to pubs/cafes and not taking a strong line in general.	5523/14938	
	Comment – there are good access links for the city centre but this is typically only for entertainment purposes.	5740/13526	
	Comment – the expansion of Monks Cross will progressively weaken the city centre shops, encourage their replacement by bars and cafes which offer little to residents and erode the special character.	6296/17235	
	Comment – in supporting Newgate Market this should be backed up by proposing to carry out the recommendations of the Newgate Market Scrutiny Review by Members, adopted in January 2011.	6518/16385	York Green Party
	Support – the policy of retaining the retail centre hierarchy, and local plans to protect retail centres and restrict out of town developments.	Petition 20	
Paragraph 9.18	Support – paragraph 9.18 supports additional retail provision on key edge of centre frontages. Additionally main town centre uses in these locations are supported. Such support is welcomed particularly in relation to the area of the Hungate site adjacent the Stonebow.	5167/12902	Hungate (York) Regeneration Ltd
Policy R4 Out Of Centre Retailing	Support – the county council support Policy R4 and its aim of seeking to limit further retail development at Monks Cross.	11/11678	North Yorkshire County Council
	Support – agree with the principles set out in Policy R4. It is important that the vitality	62/12701	Fulford Parish Council

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	and viability of the city centre as a retail location is maintained to preserve the historic fabric and maintain the city's tourist offer. This would be threatened by further growth of the out of centre retailing destinations such as the Designer Outlet at Naburn. Objection – considered that the definition of 'what is small in nature' should be reduced to 100sqm so that it is consistent with the need for an impact and sequential assessment.		
Policy R4 Out Of Centre Retailing Continued	Objection - Policy R4 should state that the creation of further floor space or changes to the type of retail at these locations will only be permitted if the proposal is small in nature (less than 200 m2) and will not impact upon the city centre vitality and viability, or significantly impact negatively on environmental sustainability in the context of climate change.	90/12830	Friends of the Earth (York and Ryedale)
	Comment – would welcome greater clarity as to the 200sqm limit; does this mean per proposed development or overall site expansion?	178/13899	York Council for Voluntary Service
	Support – restriction of developments in out of centre retail locations.	192/13998	
	Objection – plan does not fully reflect the role York Designer Outlet can play in bringing inward regional, national and international expenditure – retail and tourism. In this it differs significantly from other out of centre retail destinations which concentrate on meeting more local needs and competing amongst themselves and the city centre. As it performs a wider tourism and specialist retail function supporting the strength of the city centre it should not be constrained in the same way as Monks Cross and Clifton Moor in terms of limiting future growth. The policy should allow 5,000 – 9,300sqm net of additional floorspace in the plan period, for specialist outlet retail use only.	244/14139	McArthur Glen Designer Outlet
	Objection – policy considered to be unjustified and neither positively prepared nor consistent with national policy. To preclude retail development in excess of 200sqm at out of centre retail destinations is unduly restrictive and neither flexible nor based on appropriate evidence it is therefore unjustified. Policy is not based on a robust assessment of retail need and evidence base is not up to date. Owners have confirmed that castle Piccadilly retail scheme is no longer viable – plan should therefore be flexible enough to accommodate any future retail need as this site will not come forward. Policy is worded such that the restriction, of less than 200sqm, on retail development applies to Monks Cross, Designer Outlet and Clifton Moor and freestanding retail warehouses only and therefore other out of centre retailing would not be subject to this restriction – this is not consistent with national policy. The terminology 'will not impact on the city centre vitality and viability' is inconsistent with	331/14186	Monks Cross Shopping Park Trust

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	the National Planning Policy Framework – policy should be amended to adopt the same terminology regarding ‘significant adverse impact’. Requirement for impact assessment for out of centre proposals over 100sqm is not based on any evidence. General Development Procedure Order permits up to 200sqm without planning permission. Recommend policy reworded as follows: ‘the city contains several out of centre retailing destinations, some of which provide a wider role within the catchment. These are Monks Cross, Designer Outlet and Clifton Moor as well as other free standing retail warehouses. The creation of further retail floorspace or changes to the change of retail in these locations will only be permitted if the proposal is in accordance with the requirement of the sequential and impact test as set out in the National Planning Policy Framework.’		
Policy R4 Out Of Centre Retailing Continued	Objection – no further development of out of town retail centres should be permitted.	433/16559	
	Support – generally agree with the preferred approach in Policy R4.	1592/17599	York Civic Trust
	Comment – pleased that no further substantial out of town retail development will be considered, although ask whether this can be believed given the u-turn on monks cross, which was contrary to the policies in the Core Strategy.	1665/12950	York Environment Forum
	Comment – should the Council seek to support the allocation of land located to the north and south of Nicholas Avenue (designer outlet) it may be necessary to amend the wording of Policy R4 to ensure that the delivery of a petrol filling station and car showroom and sales are not prohibited.	1736/9818	Oakgate Group PLC
	Comment – no more out of town retail, should revive the city centre.	1886/9902	
	Comment – 30 or 40 years ago York used to be full of ‘small’ shops but the council have increased rates to such a level that it is not affordable. Drop the rates and the small shops will return this making York attractive to locals and visitors alike.	1908/9910	
	Comment – the new retail park, stadium and extra housing at Monks Cross will bring more traffic to the area. What is being done to prepare for this? Local residential areas should be protected.	2470/6754	
	Objection – against any future expansion of out of town shopping centres.	2765/7309	
	Support – agree with the proposed approach.	2846/7543	
	Objection – more out of town retail so it can only be access conveniently by car, then penalises the driver for by charging for parking. Should seek to limit retail and not build any more out of town retail units.	3151/8122	
Comment – the constant development of more and more shopping centres is already in danger of making the city centre merely a place for tourists to wander round not the town one goes to as a local resident for a pleasant shopping trip during which one	3353/8550		

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	might bump into a friend. The neighbourliness and character of the city is changing.		
Policy R4 Out Of Centre Retailing Continued	Comment – restricting retail development to Clifton Moor, Monks Cross and the Designer Outlet will create massive traffic jams in these areas made worse by the restrictions on travelling into the city centre.	3949/10506	
	Objection – does not accord with paragraph 182 of the National Planning Policy Framework (NPPF) given that the justification of the strategy set out in the first part of the policy is not based on a robust assessment of retail need, the restriction on the provision of additional retail floorspace or changes in the type of retail use in out of centre retail destinations is not consistent in terms of the sequential test set out in the NPPF, there is no robust evidence to support the adoption of a local threshold of 100sqm for sequential and impact assessments or that this threshold is proportionate. The first part of the policy is inconsistent with paragraph 9,28 of the local plan, the second part is inconsistent with paragraph 9.17 of the local plan, and is inconsistent with extant permitted development rights in relation to retail floorspace conferred by section 55 of the 1990 act and article 2a of the General Development Procedure Order.	5163/12456	USS
	Support – agree with the preferred approach	5178/12342	
	Comment – out of town needs more control than encouragement.	5222/12491	
	Comment – following the expansion of Monks Cross there should be no further expansion at out of town shopping centres until the city centre offer is improved.	5419/14718	
	Comment – there needs to be a good balance between city centre retail provision catering for tourists and visitors as well as local residents and good convenient out of town retail provision as well.	5427/14739	
	Comment – access to major retail centres (Foss Islands, Clifton Moor, Monks Cross) for the extended developments needs to be catered for within the plan.	5740/13527	
	Comment – there should be a clear policy against expansion of out of town retail (unlike recent Monks Cross expansion). For this reason do not support the proposed expansion of the Designer Outlet.	5754/13590	
	Objection - Policy R4 identifies that all retail (convenience and comparison) over 100 m ² in out of centre locations will be required to be supported by an impact and sequential assessment. This is significantly less than the National Planning Policy Framework default for requirement a retail assessment of 2500m ² . The suggested threshold of 100m ² is not justified within the draft plan or the baseline information. The National Planning Policy Framework states that local threshold should be 'proportionate'.	6159/15658	Pegasus Group
	Policy R4 Out Of	Objection – the policy of extending out of town sites as in recent Monks Cross	6179/15713

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Centre Retailing Continued	expansion is bad for city centre business, the environment and traffic flow (ring road, villages).		
	Objection – the restriction on new retail development in out of centre locations to 200sqm maximum is inconsistent with the NPPF. The threshold for retail impact and sequential test assessment of 100sqm is too low. Detail analysis in representation.	6334/15999	Smith & Ball LLP
	Support – Agree with the preferred approach and the provision of local level policy to guide retail development in retail centres/out of town centres, that protects retail centres’ function, vitality and viability and restricts development of out of town centre retail to small scale expansion. However it is considered that this last principles has already been destroyed by the nature of the new Monks cross development which will inevitably lead to redevelopment of existing square footprint out of town centres such as Clifton Moor to favour the ‘destination/leisure’ model of shopping over the ‘utility’ model and therefore weaken the city centre.	6508/17668	City Of York Council Conservative Group
	Objection – policy is still too weak. There should be a clear presumption against the building of more out of town shopping centres as stated by Planning Minister Greg Clark.	6518/16386	York Green Party
Question 9.01	Support – agree with the preferred approach	103/12864	York Tomorrow
	Support – preferred options on retail hierarchy, retail development, protection of the vitality and viability of retail centres and out of town retail development.	188/13946	
	Comment – there should be a greater emphasis on the development of city centre retail rather than out of town development.	943/16953	
	Support – excellent section. It is worrying that the city centre market share has decreased, the city centre needs encouragement.	1109/17186	
	Support – agree with the preferred approach to policies R1, R2. R3 and R4.	1457/17401	
	Support – support for the general principles of the preferred approach.	1736/9819	Oakgate Group PLC

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy R1 Retail Hierarchy	Support – the county council supports the policy thrust to safeguard and promote the retail vitality of the city centre.	11/11677	North Yorkshire County Council
	Support – pleased at recognition given to importance of and need to promote the city centre and restrict developments in out of centre locations. Support protection for existing neighbourhood centres and local parades.	192/13997	
	Comment – York Designer Outlet performs a specialist retail role within a multi layered retail offer within York. The plan recognises its specialist retail role, but fails to distinguish the outlet sufficiently well as providing a different retail offer from other out of centre retail developments.	244/14137	McArthur Glen Designer Outlet
	Objection – Monks Cross Shopping Park should be explicitly acknowledged in the retail hierarchy. City centre is physically constrained by significant heritage assets. Owners of Castle Piccadilly have confirmed that the scheme is no longer viable for retail expansion. Therefore the foundation of the plan’s strategy is unfounded and out of centre locations should be given appropriate consideration in the spatial approach of the plan, especially given the lack of any sequentially preferable sites. Preference should be given to accessible sites that are well connected to the town centre. In order to compete with other town centre retail schemes, the plan should provide flexibility to support development proposals within sustainable locations which fall outside of established centres. Monks Cross Shopping Park is complementary to the city centre and is an appropriate location for large format retailers to locate which cannot be accommodated for in the city centre. The park is in a highly sustainable location, benefitting from excellent accessibility by all modes of transport.	331/14185	Monks Cross Shopping Park Trust
	Objection – do not accept the preferred approach, there has been too much development outside of the city centre, thus encouraging unsustainable traffic growth. Favour alternative 2 – to review the hierarchy to include Monks Cross and Clifton Moor.	433/16558	
	Objection – concerned that retail provision within the former British Sugar site will not be viable because of restricted accessibility and lack of main road frontage. Object to the specific location of the potential new retail hub within the former British Sugar site on this basis. The most appropriate location for facilities should not be pre-judged and should be determined through the comprehensive master-planning exercise.	434/16595	Associated British Foods plc
	Support – See response 11	737/16881 796/16892	
	Objection - Halifax Estates does not object to the principle of the Local Plan including a retail hierarchy and supports the strategy that York City Centre is afforded the highest position within the hierarchy, followed by district and local centres. However, objects	1337/17284	Halifax Estates

York Local Plan Preferred Options – Summary Of Responses
Section 9: Retail Continued

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	to the reference that the Strategic Allocations are likely to only include local centres. Whinthorpe has been allocated some 4,680 dwellings to be delivered during the Local Plan process, a strategy which is supported by Halifax Estates. However, there is concern that a local centre would not necessarily be sufficient to support the scale of development proposed at Whinthorpe. Therefore to create a truly sustainable community, on a scale which is not disproportionate to Haxby, Halifax Estates believes that Whinthorpe should be afforded district centre status within the retail hierarchy. Would therefore recommend that the Council includes Whinthorpe in the second bullet point of Policy R1, to reflect the aspiration to create a district centre to support the new community.		
Policy R1 Retail Hierarchy Continued	Support – generally agree with the preferred approach in Policy R1.	1592/17596	York Civic Trust
	Objection – the boundary depicting the centre of the village should be extended to encompass the whole area of the village green and surrounding property, as this properly represents the centre of the village. The loss of this part of the green and loss of the woodland bordering the green, will undermine the linkage of these spaces and create a loss of facility and amenity to the village.	1599/9931	
	Support – retail hierarchy policy but do not feel that York needs to compete as a retail destination with other larger cities. Any attempt to do so would harm the special qualities that the plan seeks to protect and enhance.	1665/12947	York Environment Forum
	Objection – the key area of Hopgrove that should actually form part of the village centre is the public house and hotel, which is axiomatic, presume that this has been excluded in error. Land to the rear of the public house and hotel, a section of which fronts onto Hopgrove Lane South and is adjacent to the village centre, could potentially be developed to provide additional village services over the life of the plan.	1672/15051	Mitchells & Butlers PLC
	Support – See response 11	2124/6512	
		2521/6806	
	Comment – As a population we consume too much, need less consumption of raw materials and energy making things that are neither necessary nor essential. Too much retail space is devoted to cheap, poorly made goods that do not last and are soon thrown away.	3151/8121	
	Comment – good vitality and viability of the city centre is crucial to the health and prosperous future of the city. Please ensure the policy requirements are adhered to.	3181/8181	
	Support – see response 11. Too much out of town centres.	3246/8327	
Comment – concentrate on filling the empty shops in the city centre. Not everyone walks to the shops at large characterless out of town shops. York’s small individual	3729/10046		

York Local Plan Preferred Options – Summary Of Responses
Section 9: Retail Continued

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	shops make it unique. York shouldn't regarded as an out of town shopping experience.		
Policy R1 Retail Hierarchy Continued	Support – see response 11	3737/10082	
	Objection – see response 11	3884/10426	
	Comment – unless something is done to make it easier to park and so use the city centre it will die i.e. no shops just cafes. Cheaper parking would help considerably. Park & Ride is not a complete answer and the bus service is virtually unreliable.	4490/11511	
	Support – see response 11	4651/11780	
		4652/11786	
	Objection – see response 11	4653/11792	
		4654/11798	
	Support – see response 11	4655/11804	
		4656/11810	
		4657/11816	
		4658/11822	
		4660/11834	
		4661/11840	
		4662/11846	
		4663/11852	
		4664/11864	
		4665/11858	
		4666/11869	
		4667/11875	
		4668/11881	
		4669/11887	
		4670/11892	
	Support – see response 11	4672/11901	
		4673/11907	
	Support – see response 11	4675/11918	
		4676/11924	
		4677/11930	
		4678/11936	
Support – see response 11	4679/11942		
	4680/11948		
	4682/11961		

York Local Plan Preferred Options – Summary Of Responses
Section 9: Retail Continued

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy R1 Retail Hierarchy Continued	Support – see response 11	4683/11967	
	Objection – see response 11	4684/11973	
	Objection – Clifton Moor Retail Park (incorporating Q Leisure Park) should be designated within the retail hierarchy as a District Centre. This would address the lack of designated centre in this area of York and provide an appropriate location to meet the needs of the existing residential population and proposed population to be forthcoming under allocation ST14.	5163/12454	USS
	Support – agree with the preferred approach	5178/12340	
	Comment – Haxby shopping centre could be improved but not enlarged. It just about supports the community but would struggle if there were any further housing developments.	5851/15097	
	Support – see response 11	6064/15520	
	Support – support the scope for additional local convenience and retail provision required to support the provision for local day to day shopping needs to support the development of new local centres within some of the strategic allocations. Also support opportunities to maintain and enhance existing local centres and the provision of additional local centres to enhance the sustainability of new communities and strategic allocations. Support the scope for additional food store provision arising from proposed population growth and to allocate distinct/local centres for local provision. Support the evidence set out in The Retail Study (2008) and the Core Strategy Retail Supporting Paper (2011) which have identified the need for more food store provision in the City Centre and the City of York Economic and Retail Growth and Visioning Study (2013) which identifies that the food and grocery sector is expected to continue to grow over the plan period. Noted however that there is a need for the Council to undertake a more detailed assessment of the food retail capacity arising from the anticipated growth and the requirements for further main food store provision in the City. It is considered that there is scope for further superstore provision, in stores in the region of 5000 sqm sales areas, to meet customer requirements, enhance customer choice and encourage a competitive and vibrant retail sector. Comment – National Planning Policy Framework paragraph 23 identifies the need for Local Planning Authorities to undertake on assessment of the need to expand town centres to secure significant supply of suitable sites. The Council’s ‘Economic and Retail Growth Analysis and Visioning Work’ (2013) provides insufficient evidence that the increased requirements for convenience goods provision has been fully assessed.	6065/15526 6159/15657	Pegasus Group

York Local Plan Preferred Options – Summary Of Responses
Section 9: Retail Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy R1 Retail Hierarchy Continued	Objection – the policy of extending out of town sites as in recent Monks Cross expansion is bad for city centre business, the environment and traffic flow (ring road, villages).	6179/15712	
	Support – agree with the approach but should go further to pedestrianise the centre and improve the cleanliness; creating areas like the "cultural quarter". The fact that Leeds has a large new urban shopping centre does not mean we need one to compete. The out of town centres do seem to work.	6213/15749	
	Support – agree with the aim to maintain and enhance the viability of the city centre and local centres and that out of town shopping centre development needs to be carefully controlled.	6307/15949	
	Comment – accepted by the Council that Monks Cross is an accessible location. Considered that its allocation as a district centre within the retail hierarchy would recognise the 'de facto' position. Detailed analysis in representation.	6334/15998	Smith & Ball LLP
	Support – see response 11	6505/16255 6506/16261	
	Support – agree with the preferred approach to retain existing retail centre hierarchy but consider that the Council have already undermined the hierarchy by the new 'destination shopping' transformation of monks cross as witnessed by the cancelling of Coppergate 2.	6508/17666	City Of York Council Conservative Group
	Support – the preferred approach to the existing retail centre hierarchy remains correct and desirable. Comment – the plan is weak in terms of how the hierarchy will be achieved and needs to be strengthened.	6518/16383	York Green Party
	Support – agree with the retail hierarchy but feel that Monks Cross 2 has already undermined this as demonstrated by the recent withdrawal of plans in Castle Piccadilly.	6519/16466	Cllr Jenny Brooks

York Local Plan Preferred Options – Summary Of Responses
Section 9: Retail Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy R2 District Centres, Local Centres And Neighbourhood Parade	Objection – there should be a policy to protect existing community facilities and access to them including local shops.	62/12708	Fulford Parish Council
	Objection - Policy R2 should state that retail developments will be considered acceptable in principle provided that 'it is environmentally sustainable in the context of climate change'.	90/12829	Friends of the Earth (York and Ryedale)
	Objection – welcome the first bullet point of the policy but believe it should be strengthened to the following: 'consolidates, maintains or improves upon the function, vitality and viability of the centre in relation to both its retail and its cultural and community facilities'.	178/13898	York Council for Voluntary Service
	Comment – smaller type supermarkets harm central stores and also sell alcohol and there is a serious problem with than in the city centre.	679/16860	
	Comment – the plan should include development of existing community centres which would be able to provide for residents and reduce pressures of city centre shops and travelling for shopping.	703/17055	
	Support - welcome the recognition in Policy R2 and paragraph 9.5 that local convenience and retail provision will be required to support the local day-to-day shopping needs of some of the Strategic Sites including Clifton Gate. Aspirations are for Clifton Gate to be a self- sustaining settlement, with the level of retail provision being determined and evidenced through the masterplanning process.	1523/17498	Commercial Estates Group, Hallam Land Management & T W Fields Ltd
	Support – generally agree with the preferred approach in Policy R2.	1592/17597	York Civic Trust
	Comment – policy should protect district centres, local centres and neighbourhood parades from being taken over by supermarkets and other chain stores.	1665/12948	York Environment Forum
	Support – very pleased to see protection for Bishopthorpe Road shops	2663/7053	
	Support – agree with the preferred approach	5178/12341	
	Comment - the retail facilities in Strensall are limited by the being split in to two small areas, the result of myopic, short-term, housing-focussed priorities. There has never been a plan for Strensall to develop its retail outlets and the Council has stifled any possibility by its inattention to infrastructure planning. The Council has robbed Strensall of the possibility of developing a centre through developing site H32 as housing.	5189/12405	
	Support – pleased to see that Haxby has been designed as a local centre.	5865/15134	St Mary's Parochial Church Council
	Support – the preferred approach to the retail centre hierarchy remains correct and desirable. Comment – the plan is weak in terms of how the hierarchy will be achieved and needs	6518/16384	York Green Party

York Local Plan Preferred Options – Summary Of Responses
Section 9: Retail Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	to be strengthened.		
Paragraph 9.05	Objection – Clifton Moor Retail Park (incorporating Q Leisure Park) should be designated as a District Centre. This would address the lack of designated centre in this area of York and provide an appropriate location to meet the needs of the existing residential population and proposed population to be forthcoming under allocation ST14.	5163/12906	USS

York Local Plan Preferred Options – Summary Of Responses
Section 9: Retail Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy R3 York City Centre Retail	Objection – development of Monks Cross and the resultant withdrawal of the developer from the castle Piccadilly scheme makes the retail development on the west bank of the Foss redundant, reducing the estimated floor space provision. Allocation ST20 should be revised to Piccadilly only. This should also be reflected in paragraph 9.18.	103/12862	York Tomorrow
	Objection – amend third bullet to read: ‘the reuse and development of existing units (with the advice of specialist conservation officers) to create additional floorspace...’	188/13945	
	Comment – it is extremely important to ‘manage the provision of parking...to ensure it supports the vitality of the city centre.’ Parking is a key issue for the centre, faced with the free and ample parking provided by out of town competitors.	192/13999	
	Comment – support third and final bullet points of the policy. First bullet point should include a clear statement that a masterplan will be developed for the castle Piccadilly area and that piecemeal development which would be likely to prejudice the development and realisation of a comprehensive scheme for the area will not be permitted. It is essential that the area is developed comprehensively due to the sensitivity of the area and the number of potential constraints upon the scale, form and design of any development.	238/14069	English Heritage
	Objection – York Designer Outlet supports the city centre, acting as a tourist attraction and as a catalyst for drawing visitors and expenditure into the City of York. In this respect the outlet helps to support the city centre – it reinforces, rather than competes with, the city centre specialist retail offer.	244/14138	McArthur Glen Designer Outlet
	Support – generally agree with the preferred approach in Policy R3.	1592/17598	York Civic Trust
	Comment – policy is broadly supported, however retail should be one element of city centre development, as the nature of shopping changes. Need no more supermarkets in the city centre.	1665/12949	York Environment Forum
	Support – support for Newgate Market and paragraph 9.21. It needs to be advertised more within the city centre because tourists don’t know where it is. If something is not done the market will die. The market is a very important part of York’s history for past and future. Could make the market look trendier for all ages. Should be able to trade in Parliament Street, not just on a Monday.	2654/7030	
	Support – agree that the city centre should be safeguarded against further retail developments outside the city. Agree that the Castle Piccadilly site should be developed for retail use.	4810/12120	
	Support - Policy R3 supports additional retail provision on key edge of centre frontages. Additionally main town centre uses in these locations are supported. Such support is welcomed particularly in relation to the area of the Hungate site adjacent	5167/12901	Hungate (York) Regeneration Ltd

York Local Plan Preferred Options – Summary Of Responses
Section 9: Retail Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	the Stonebow.		
Policy R3 York City Centre Retail Continued	Support – agree with the preferred approach	5178/12343	
	Comment – having witnessed the decline in offer at Newgate Market and the decline in ‘useful’ city centre shops (butchers, bike shops, bookshops etc) the city centre will need active encouragement and promotion to survive.	5222/12490	
	Comment – there needs to be a good balance between city centre retail provision catering for tourists and visitors as well as local residents and good convenient out of town retail provision as well.	5427/14738	
	Comment – lots of good statements about the need for good quality shops, why does the council put it at risk by permitting more major chain coffee shops when there are far too many already, allowing retail premises to be changed to pubs/cafes and not taking a strong line in general.	5523/14938	
	Comment – there are good access links for the city centre but this is typically only for entertainment purposes.	5740/13526	
	Comment – the expansion of Monks Cross will progressively weaken the city centre shops, encourage their replacement by bars and cafes which offer little to residents and erode the special character.	6296/17235	
	Comment – in supporting Newgate Market this should be backed up by proposing to carry out the recommendations of the Newgate Market Scrutiny Review by Members, adopted in January 2011.	6518/16385	York Green Party
	Support – the policy of retaining the retail centre hierarchy, and local plans to protect retail centres and restrict out of town developments.	Petition 20	
Paragraph 9.18	Support – paragraph 9.18 supports additional retail provision on key edge of centre frontages. Additionally main town centre uses in these locations are supported. Such support is welcomed particularly in relation to the area of the Hungate site adjacent the Stonebow.	5167/12902	Hungate (York) Regeneration Ltd

York Local Plan Preferred Options – Summary Of Responses
Section 9: Retail Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy R4 Out Of Centre Retailing	Support – the county council support Policy R4 and its aim of seeking to limit further retail development at Monks Cross.	11/11678	North Yorkshire County Council
	Support – agree with the principles set out in Policy R4. It is important that the vitality and viability of the city centre as a retail location is maintained to preserve the historic fabric and maintain the city’s tourist offer. This would be threatened by further growth of the out of centre retailing destinations such as the Designer Outlet at Naburn. Objection – considered that the definition of ‘what is small in nature’ should be reduced to 100sqm so that it is consistent with the need for an impact and sequential assessment.	62/12701	Fulford Parish Council
	Objection - Policy R4 should state that the creation of further floor space or changes to the type of retail at these locations will only be permitted if the proposal is small in nature (less than 200 m2) and will not impact upon the city centre vitality and viability, or significantly impact negatively on environmental sustainability in the context of climate change.	90/12830	Friends of the Earth (York and Ryedale)
	Comment – would welcome greater clarity as to the 200sqm limit; does this mean per proposed development or overall site expansion?	178/13899	York Council for Voluntary Service
	Support – restriction of developments in out of centre retail locations.	192/13998	
	Objection – plan does not fully reflect the role York Designer Outlet can play in bringing inward regional, national and international expenditure – retail and tourism. In this it differs significantly from other out of centre retail destinations which concentrate on meeting more local needs and competing amongst themselves and the city centre. As it performs a wider tourism and specialist retail function supporting the strength of the city centre it should not be constrained in the same way as Monks Cross and Clifton Moor in terms of limiting future growth. The policy should allow 5,000 – 9,300sqm net of additional floorspace in the plan period, for specialist outlet retail use only.	244/14139	McArthur Glen Designer Outlet
	Objection – policy considered to be unjustified and neither positively prepared nor consistent with national policy. To preclude retail development in excess of 200sqm at out of centre retail destinations is unduly restrictive and neither flexible nor based on appropriate evidence it is therefore unjustified. Policy is not based on a robust assessment of retail need and evidence base is not up to date. Owners have confirmed that castle Piccadilly retail scheme is no longer viable – plan should therefore be flexible enough to accommodate any future retail need as this site will not come forward. Policy is worded such that the restriction, of less than 200sqm, on retail development applies to Monks Cross, Designer Outlet and Clifton Moor and	331/14186	Monks Cross Shopping Park Trust

York Local Plan Preferred Options – Summary Of Responses
Section 9: Retail Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	<p>freestanding retail warehouses only and therefore other out of centre retailing would not be subject to this restriction – this is not consistent with national policy. The terminology ‘will not impact on the city centre vitality and viability’ is inconsistent with the National Planning Policy Framework – policy should be amended to adopt the same terminology regarding ‘significant adverse impact’. Requirement for impact assessment for out of centre proposals over 100sqm is not based on any evidence. General Development Procedure Order permits up to 200sqm without planning permission. Recommend policy reworded as follows: ‘the city contains several out of centre retailing destinations, some of which provide a wider role within the catchment. These are Monks Cross, Designer Outlet and Clifton Moor as well as other free standing retail warehouses. The creation of further retail floorspace or changes to the change of retail in these locations will only be permitted if the proposal is in accordance with the requirement of the sequential and impact test as set out in the National Planning Policy Framework.’</p>		
<p>Policy R4 Out Of Centre Retailing Continued</p>	<p>Objection – no further development of out of town retail centres should be permitted.</p>	433/16559	
	<p>Support – generally agree with the preferred approach in Policy R4.</p>	1592/17599	York Civic Trust
	<p>Comment – pleased that no further substantial out of town retail development will be considered, although ask whether this can be believed given the u-turn on monks cross, which was contrary to the policies in the Core Strategy.</p>	1665/12950	York Environment Forum
	<p>Comment – should the Council seek to support the allocation of land located to the north and south of Nicholas Avenue (designer outlet) it may be necessary to amend the wording of Policy R4 to ensure that the delivery of a petrol filling station and car showroom and sales are not prohibited.</p>	1736/9818	Oakgate Group PLC
	<p>Comment – no more out of town retail, should revive the city centre.</p>	1886/9902	
	<p>Comment – 30 or 40 years ago York used to be full of ‘small’ shops but the council have increased rates to such a level that it is not affordable. Drop the rates and the small shops will return this making York attractive to locals and visitors alike.</p>	1908/9910	
	<p>Comment – the new retail park, stadium and extra housing at Monks Cross will bring more traffic to the area. What is being done to prepare for this? Local residential areas should be protected.</p>	2470/6754	
	<p>Objection – against any future expansion of out of town shopping centres.</p>	2765/7309	
	<p>Support – agree with the proposed approach.</p>	2846/7543	
<p>Objection – more out of town retail so it can only be access conveniently by car, then penalises the driver for by charging for parking. Should seek to limit retail and not build any more out of town retail units.</p>	3151/8122		

York Local Plan Preferred Options – Summary Of Responses
Section 9: Retail Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	Comment – the constant development of more and more shopping centres is already in danger of making the city centre merely a place for tourists to wander round not the town one goes to as a local resident for a pleasant shopping trip during which one might bump into a friend. The neighbourliness and character of the city is changing.	3353/8550	
Policy R4 Out Of Centre Retailing Continued	Comment – restricting retail development to Clifton Moor, Monks Cross and the Designer Outlet will create massive traffic jams in these areas made worse by the restrictions on travelling into the city centre.	3949/10506	
	Objection – does not accord with paragraph 182 of the National Planning Policy Framework (NPPF) given that the justification of the strategy set out in the first part of the policy is not based on a robust assessment of retail need, the restriction on the provision of additional retail floorspace or changes in the type of retail use in out of centre retail destinations is not consistent in terms of the sequential test set out in the NPPF, there is no robust evidence to support the adoption of a local threshold of 100sqm for sequential and impact assessments or that this threshold is proportionate. The first part of the policy is inconsistent with paragraph 9,28 of the local plan, the second part is inconsistent with paragraph 9.17 of the local plan, and is inconsistent with extant permitted development rights in relation to retail floorspace conferred by section 55 of the 1990 act and article 2a of the General Development Procedure Order.	5163/12456	USS
	Support – agree with the preferred approach	5178/12342	
	Comment – out of town needs more control than encouragement.	5222/12491	
	Comment – following the expansion of Monks Cross there should be no further expansion at out of town shopping centres until the city centre offer is improved.	5419/14718	
	Comment – there needs to be a good balance between city centre retail provision catering for tourists and visitors as well as local residents and good convenient out of town retail provision as well.	5427/14739	
	Comment – access to major retail centres (Foss Islands, Clifton Moor, Monks Cross) for the extended developments needs to be catered for within the plan.	5740/13527	
	Comment – there should be a clear policy against expansion of out of town retail (unlike recent Monks Cross expansion). For this reason do not support the proposed expansion of the Designer Outlet.	5754/13590	
	Objection - Policy R4 identifies that all retail (convenience and comparison) over 100 m ² in out of centre locations will be required to be supported by an impact and sequential assessment. This is significantly less than the National Planning Policy Framework default for requirement a retail assessment of 2500m ² . The suggested threshold of 100m ² is not justified within the draft plan or the baseline information.	6159/15658	Pegasus Group

York Local Plan Preferred Options – Summary Of Responses
Section 9: Retail Continued

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	The National Planning Policy Framework states that local threshold should be 'proportionate'.		
Policy R4 Out Of Centre Retailing Continued	Objection – the policy of extending out of town sites as in recent Monks Cross expansion is bad for city centre business, the environment and traffic flow (ring road, villages).	6179/15713	
	Objection – the restriction on new retail development in out of centre locations to 200sqm maximum is inconsistent with the NPPF. The threshold for retail impact and sequential test assessment of 100sqm is too low. Detail analysis in representation.	6334/15999	Smith & Ball LLP
	Support – Agree with the preferred approach and the provision of local level policy to guide retail development in retail centres/out of town centres, that protects retail centres' function, vitality and viability and restricts development of out of town centre retail to small scale expansion. However it is considered that this last principles has already been destroyed by the nature of the new Monks cross development which will inevitably lead to redevelopment of existing square footprint out of town centres such as Clifton Moor to favour the 'destination/leisure' model of shopping over the 'utility' model and therefore weaken the city centre.	6508/17668	City Of York Council Conservative Group
	Objection – policy is still too weak. There should be a clear presumption against the building of more out of town shopping centres as stated by Planning Minister Greg Clark.	6518/16386	York Green Party

York Local Plan Preferred Options – Summary Of Responses
Section 9: Retail Continued

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Question 9.01	Support – agree with the preferred approach	103/12864	York Tomorrow
	Support – preferred options on retail hierarchy, retail development, protection of the vitality and viability of retail centres and out of town retail development.	188/13946	
	Comment – there should be a greater emphasis on the development of city centre retail rather than out of town development.	943/16953	
	Support – excellent section. It is worrying that the city centre market share has decreased, the city centre needs encouragement.	1109/17186	
	Support – agree with the preferred approach to policies R1, R2. R3 and R4.	1457/17401	
	Support – support for the general principles of the preferred approach.	1736/9819	Oakgate Group PLC