

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
General	<p>Comment – evidence base – Infrastructure Delivery Plan (IDP) - to gain a full understanding of the proposed Local Plan, the evidence base behind it and its impact on York and its various communities, there should be an Infrastructure Delivery Plan setting out what new infrastructure, roads, utilities etc may be required to deliver new housing and other development. If this report exist, it is imperative that it be fully and openly available.</p>	46/12587	Heslington Village Trust
	<p>Comment – evidence base – IDP - to gain a full understanding of the proposed Local Plan, the evidence base behind it and its impact on York and its various communities, there should be an Infrastructure Delivery Plan setting out what new infrastructure, roads, utilities etc may be required to deliver new housing and other development. If this report exist, it is imperative that it be fully and openly available.</p>	48/12596	Heslington Parish Council
	<p>Support – evidence base – IDP - pleased to see that the social and environmental role of infrastructure is referenced in the IDP. Equally pleased to see that infrastructure is explained to include health, education, affordable housing, green space and community facilities.</p> <p>Objection - evidence base – IDP – concerns at the lack of consultation with the voluntary, community and social enterprise sector partners who in many cases are responsible for significant delivery in these areas. No consultation with the Health and Wellbeing Board, its subgroups and relevant voluntary sector forums, no apparent consultation with housing associations and housing advice agencies and no consultation with environmental Non-Governmental Organisations including landholders. Surprising that there as been no consultation with any voluntary, community or social enterprise organisations in relation to community facilities given that the IDP lists charities, community groups and other third sector organisations as being responsible for delivery. Find the conclusion of the IDP that the Local Plan is deliverable to be a premature conclusion. Strongly recommend that consultation about Community Infrastructure Levy (CIL) and Section 106 Agreements (S106) take place in advance of the adoption of the Local Plan. If it is left until adoption there could be an intervening period where the plan is active and no CIL/S106 guidance is in place which could allow less responsible developers to take advantage of the temporary loophole.</p>	178/14441	York Council for Voluntary Service
	<p>Comment - request formal consultation on the preparation of the further planning document referred to in paragraph 25.2. The plan must ensure, in accordance with the NPPF that the requirement for funding of strategic infrastructure on developers does</p>	434/16594	Associated British Foods plc

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	<p>not hamper the viability and delivery programme of key strategic sites. Any infrastructure requirements associated with new developments must be directly related to the impact of that particular development, in accordance with Community Infrastructure Levy (CIL) regulations. The commercial viability of a development should not be compromised by the requirement of large scale infrastructure. The absence of an adopted CIL tariff in the short term should not delay the progression of development sites through the planning process. It will be critical that this further planning document provides clarity on the difference between funding sought via Section 106 Agreements (which should related solely to the site specific or local impacts of particular development, with limited pooling of contributions), and the strategic infrastructure requirements that are to be funded via CIL payments. This is important to avoid any double counting of contributions sought from developers.</p>		
General Continued	<p>Comment – development will only succeed if it follows infrastructure. This will necessitate at least partial funding by developers as the capital costs cannot all be met from Council budgets. Capital beneficiaries (i.e. the private sector and public agencies) will have to bear the brunt of any improvements in city infrastructure verses assets.</p>	2416/6687	
	<p>Objection – evidence base – Infrastructure Delivery Plan (IDP) – Table 5.1 indicates principle transport infrastructure measures in the north of the city without funding sources being secure and does not accord with the projected timescales for the significant scale of house building proposed adjacent to the outer ring road meaning that these sites are both financially and environmentally unsustainable. The same lack of evidence of deliverable transport infrastructure (sustainable or otherwise) applies in the short term at least in relation to Whinthorpe. Para 4.88 (capacity at the Rawcliffe WWTW) suggests that major development alongside the outer ring road is not viable within the first 5years of the plan. Para 4.101 states the areas that have experienced surface water flooding in the past, this information needs to be mapped as part of the Surface Water Management Plan and the likely upgrades required to the drainage infrastructure within the plan period should be identified. This will assist potential developers who need to be aware of the likely infrastructure costs. For waste, the current uncertainty over Allerton Park means that the plan should identify contingency plans and sites for an alternative approach.</p> <p>Support – evidence base – IDP – support the proposed approach to the provision of community facilities with an emphasis on access by sustainable transport to existing or new provision. It will be important to ensure that these are accessible financially as well as physically, with social inclusion a key criterion for provision for new residential</p>	6518/16457	York Green Party

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	developments.		

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy IDC1 Infrastructure And Developer Contributions	Objection – evidence base – Infrastructure Delivery Plan (IDP) – delivery of green infrastructure (GI) is limited in the IDP, of most concern is the deferral of identifying future needs to the GI strategy (para 4.126) without any timetable for this document’s completion. The positive approach to GI and Biodiversity in the plan should be mirrored in the IDP. Given the potential requirement to provide natural greenspace/recreational buffers around ST10 and ST15 these requirements should at the very least be identified in the IDP as the delivery of these allocations may depend on the delivery of this GI. Reliance on development contributions and focus on recreational open space (para 4.128) without a strategy in place may jeopardise the delivery of a GI strategy and ecological network as required by the NPPF.	2/11594	Natural England
	Objection – Policy IDC1 should make specific reference to developers being required to provide contributions towards new flood alleviation schemes, the long term maintenance of existing defences and habitat creation through Community Infrastructure Levy (CIL). Would especially encourage the plan to seek developer contributions for any proposed development within the Foss Basin towards the maintenance/improvement of existing defences i.e. the Foss Barrier.	3/11636	Environment Agency
	Comment – development will require major infrastructure to be delivered to ensure development proceeds, pleased to note that a CIL mechanism is being progressed alongside the plan to provide for developer contributions so development should not be delayed from lack of funding.	7/11647	Hambleton District Council
	Objection – there should be a policy that ensures that a significant proportion of funds raised by S106 obligations and CIL are used to benefit community facilities in the local areas affected by development.	62/12709	Fulford Parish Council
	Comment – before the first brick is laid (in Haxby) arrangements should be made to ensure that that the correct infrastructure and funding are in place. Concerned that development will occur in an incremental fashion where no one developer is seen to breach the hurdles for infrastructure impact therefore leading eventually to the large scale work outlined in the plan but having already allocated the smaller CIL monies to other projects. The result would be that provision for wider infrastructure improvements were not made.	63/12720	Haxby Town Council
	Objection - the plan’s preferred approach is to require infrastructure to be in place ‘prior to development’. This approach will not be feasible for some of the strategic sites, given the substantial upfront costs in providing infrastructure. Policy IDC1 should be amended to refer to phasing. The following text is suggested: ‘In the case of the Strategic Sites, the associated infrastructure and the timescales for its delivery will be	144/12890	Hogg Builders (York) Ltd

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	agreed on a site-by-site basis, taking into account phasing and viability.'		
Policy IDC1 Infrastructure And Developer Contributions Continued	Objection - once Community Infrastructure Levy (CIL) is adopted this should be the only tool for collecting funds to address the cumulative impacts of development on types of infrastructure. Therefore the policy needs to explicitly explain any funds received through section 106 agreements will relate solely to the requirements necessary to make the development acceptable in planning terms; be directly related to the development and be fairly and reasonably related in scale and kind to the development. They should not seek to rectify existing deficits or wider strategic infrastructure issues as this is the role of CIL. Whilst the supporting Infrastructure Delivery Plan (IDP) is noted it is recommended that the policy be amended to clearly define how section 106 and CIL will work in practice and how the funding from each will be used to promote development.	145/13878	Home Builders Federation
	Objection – the Chamber is concerned that Policy IDC1 makes no reference to viability considerations in setting out the requirement for infrastructure and developer contributions. There is no evidence to demonstrate the requirements of the policy will not render development unviable. Viability consideration should be one of the guiding principles informing this policy. The policy should be rewritten having regard to paragraphs 173 and 174 of the NPPF.	187/13927	York & North Yorkshire Chamber of Commerce
	Comment – supports the identification of community facilities (includes built sports facilities) and sports pitches as infrastructure that might be required of development under Policy IDC1. Concerned however that neither the Built Sports Facilities Strategy nor the Playing Pitch Strategy are currently clear in what is required in respect of pitches or facilities in order to be able to inform this policy.	349/14195	Sport England
	Comment – infrastructure should be provided prior to and during development rather than following it. This should include adequate leisure provision and open space.	387/14207	Active York
	Objection - object to the wording of the preferred approach to require physical, social and economic infrastructure to be in place prior to development. It is considered this approach is overly restrictive on the timing of new development. For certain sites, including large scale brownfield regeneration sites, the costs of providing all physical, social and economic infrastructure in advance of any development may have the effect of rendering the development unviable, at least in the early stages, and therefore a more pragmatic, realistic and flexible approach is warranted.	434/16593	Associated British Foods plc
	Objection – flexibility is required when negotiating developer contributions to ensure that a scheme remains viable following potential S106 agreements and/or CIL requirements. Each scheme must be assessed on its individual merits to ensure	528/16676	York Diocesan Board of Finance

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	development can and will take place. It is essential that the policy goes further to ensure that the plan will seek to 'strike a balance' between the level of contribution to ensure sustainable development and the realities of economic viability. Reference should be made to the Local Housing Delivery Group June 2012 document and paragraph 173 and 174 of the NPPF. Policy IDC1 must ensure that the addition of developer contributions and/or CIL will not put the overall development at serious risk.		
Policy IDC1 Infrastructure And Developer Contributions Continued	<p>Objection – does not allow for viability to be taken into consideration. It will be vital to explain how any funds received through Section 106 will relate solely to the requirements necessary to make the development acceptable in planning terms, be directly related to the development and be fairly and reasonably related in scale to the development. Recommend that the policy be amended to define more clearly how section 106 agreements and Community Infrastructure Levy (CIL) will work in practice and how funding from each will be used to promote development. The following text is recommended 'it is accepted that there may be times when development viability may prevent proposals from meeting all of their necessary planning obligations. Where such a case is being made, applications will need to be accompanied by a detailed viability assessment which will be considered by an independent assessor'.</p> <p>Objection – evidence base – Infrastructure Delivery Plan (IDP) - once CIL is adopted this will be the only tool for collecting funds to address the cumulative impacts of development on various types of infrastructure. This is not explicitly clear within the IDP.</p>	659/15093	Persimmon Homes
	Objection - once CIL is adopted this should be the only tool for collecting funds to address the cumulative impacts of development on types of infrastructure. Therefore the policy needs to explicitly explain any funds received through section 106 agreements will relate solely to the requirements necessary to make the development acceptable in planning terms; be directly related to the development and be fairly and reasonably related in scale and kind to the development. They should not seek to rectify existing deficits or wider strategic infrastructure issues as this is the role of CIL. Whilst the supporting Infrastructure Delivery Plan is noted it is recommended that the policy be amended to clearly define how section 106 and CIL will work in practice and how the funding from each will be used to promote development.	673/16851	Taylor Wimpey UK Ltd
	Comment – the infrastructure regarding roads, local centres, schools and shopping need clarification and the ring road should be moved ahead of other proposals as the density of traffic is unacceptable.	703/17054	
	Objection – see response 11	737/16883	

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy IDC1 Infrastructure And Developer Contributions Continued	Objection – see response 11	796/16894	
	Objection – cannot see how developers can be expected to provide all services, roads, community buildings, education and health establishments and still fulfil the outline of the local plan.	969/16998	
	Support – support the principle that new development will not be permitted unless the necessary infrastructure to meet local and wider (strategic) demand generated by development can be provided and coordinated. Comment – concerned that any physical measures which are identified on the strategic road network or at its junctions with the local primary road network in order to mitigate the impact of development traffic can be funded through Community Infrastructure Levy (CIL) or other appropriate mechanisms. Considered essential that the Highways Agency is party to future discussions on CIL and in particularly on the criteria and priorities to be applied in the allocation of CIL funds.	1264/17163	Highways Agency
	Comment - what are the plans for a larger water supply and increased sewage disposal?	1272/211	
	Comment - note that CIL has yet to be fully viability tested. The Local Plan Viability Study states that further viability testing of strategic sites is required before draft CIL rates are proposed.	1337/17300	Halifax Estates
	Objection – although some viability work has been undertaken, concerned that this does not consider the full range of potential financial constraints imposed by the draft policies. The respective policies do not incorporate sufficient flexibility to enable a viable solution for delivery to be realised where this is considered to be desirable in planning terms. The approach to viability and delivery of development needs to be comprehensively reviewed.	1361/17341	National Grid
	Support – agree with the preferred approach to infrastructure and developer contributions. Comment – whilst accepting the principles in the preferred approach a policy needs to be developed through the Neighbourhood Plan mechanism that establishes the principle that Parishes should have a right to determine where and how some of the S106, CIL and other monies resulting from developments in their area are spent.	1457/17435	
	Objection - once CIL is adopted this should be the only tool for collecting funds to address the cumulative impacts of development on types of infrastructure. Therefore the policy needs to explicitly explain any funds received through section 106 agreements will relate solely to the requirements necessary to make the development acceptable in planning terms; be directly related to the development and be fairly and	1514/17487	Monks Cross North Consortium

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	reasonably related in scale and kind to the development. They should not seek to rectify existing deficits or wider strategic infrastructure issues as this is the role of CIL. Whilst the supporting Infrastructure Delivery Plan is noted it is recommended that the policy be amended to clearly define how section 106 and CIL will work in practice and how the funding from each will be used to promote development		
Policy IDC1 Infrastructure And Developer Contributions Continued	Objection - the plan's preferred approach is to require this infrastructure to be in place 'prior to development'. This approach will not be feasible for some of the strategic sites, given the substantial upfront costs in providing infrastructure. Policy IDC1 should be amended to refer to phasing. The following text is suggested: 'In the case of the Strategic Sites, the associated infrastructure and the timescales for its delivery will be agreed on a site-by-site basis, taking into account phasing and viability.'	1523/17515	Commercial Estates Group, Hallam Land Management & T W Fields Ltd
	Objection - Policy IDC 1 refers to the Infrastructure Delivery Plan. The proposed strategy is unclear as to how developer contributions will be dealt with. Greater clarity is required in order to ensure certainty for developers in assessing development proposals. The plan also needs to demonstrate that a detailed viability appraisal of the proposals has been undertaken to ensure that the potential effect of the plan accords with the Government's requirement that viable development is not inhibited by policy requirements (NPPF paragraph 173).	1661/9955	Linden Homes
	Objection – the government inspector commented negatively on the scale of obligations affecting viability of developments in the previous Core Strategy. How is this different? There are even more obligations.	1665/12932	York Environment Forum
	Comment – the policy needs to set out how this will work alongside S106 contributions and Community Infrastructure Levy (CIL). It is imperative that the policy does not conflict with CIL regulations.	1668/15047	Barratt & David Wilson Homes
	Comment – developer contributions should be the direct result of a need generated for development and that planning obligations can only be sought where they are necessary to address the unacceptable impacts of a development and so directly related to the impacts of a proposals that should be permitted without them. Contributions must be based on up to date robust evidence of infrastructure needs and clearly based on policy requirements. Planning obligations cannot be used to make up the funding gap for desirable infrastructure or to support the provision of unrelated items. It is important to remember that planning obligations should be applied flexibly to prevent planning development from being stalled. Where obligations are being sought they should take account of market conditions over time. The costs of any requirements likely to be applied to development should, when taking account of the	1705/9799	Gladman Developments

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	normal costs of developments, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable.		
Policy IDC1 Infrastructure And Developer Contributions Continued	Comment - no enhanced land value with agricultural development therefore CIL would have to be paid from revenue making all/most agricultural development unviable. To ensure a clear and fair charging schedule suggest that agriculture, agriculture tied houses and barn conversions be excluded from any proposed charge.	1742/2128	NFU
	Comment – it is stated that the plan requires infrastructure improvements will be the responsibility of developers. In such cases explanation is needed to explain how the cost and responsibility will be split between several developers, potentially over a number of years and how it will be ensured that the improvements are completed before the houses are built.	2012/6501	
	Objection – see response 11	2124/6514	
	Objection - building 22000 new homes would require massive investment in infrastructure. No evidence that funds for this will be available.	2127/1434	
	Objection – see response 11	2521/6807	
	Objection – flexibility is required when negotiating developer contributions to ensure that a scheme remains viable following potential Section 106 agreements and/or Community Infrastructure Levy (CIL) requirements. Each scheme must be assessed on its individual merits to ensure development can and will take place. It is essential that the policy goes further to ensure that the plan will seek to 'strike a balance' between the level of contribution to ensure sustainable development and the realities of economic viability. Reference should be made to the Local Housing Delivery Group June 2012 document and paragraph 173 and 174 of the NPPF. Policy IDC1 must ensure that the addition of developer contributions and/or CIL will not put the overall development at serious risk.	2769/7331	
	Comment – please plan with care and love.	2787/7386	
	Comment - there appears to have been little serious consideration given to the impact of the proposed housing developments on the local infrastructure - traffic, schools, leisure facilities etc. Even a cursory look at the proposed plans is enough to realise that a very large investment would have to be made to help simply cope with such developments - money spent to alleviate problems caused as opposed to money spent to improve the quality of life of York residents.	2798/7427	
	Comment – concerned about the ability of schools, hospitals, doctors and dentists to absorb the huge increases in population numbers.	2806/7449	

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	Comment – had hoped to obtain land on Common Road, Dunnington for extra playing fields and car parking facilities. Both are badly needed. The need for larger playing fields is of great importance to the village as a whole. The Common Road area is the only suitable area for this.	2840/7522	
	Support – agree with the approach to infrastructure and developer contributions.	2846/7580	
	Comment – consider that an investigation should take place to find out whether shops and services like the hospital or fire department can manage with the proposed new residents.	2849/7588	
	Comment – large developments need a balanced mix of amenities (churches, schools, parks, libraries, shops, restaurants, surgeries/health centres, community centres etc). Developers must guarantee such delivery.	2995/7785	
	Objection – see response 11	3246/8329	
	Comment – the non-delivery of essential infrastructure is relevant to the Plan's proposed housing and commercial developments on and around the A1237 outer ring road. Prior to the start of the proposed developments around the A1237 a major upgrade to the road is essential to cope with the extra volume of traffic which will be generated and to make the proposed development a sustainable one.	3428/8775	
	Comment – the infrastructure is not sufficiently developed within the city to a good enough standard to satisfy the needs of an additional 65,000 residents.	3609/9599	
	Objection – see response 11	3737/10083	
	Objection – see response 11	3884/10427	
	Objection – concerned that there is not sufficient detail in the Infrastructure Delivery Plan around each of the local areas designated for the Plan. Worry that promises such as upgrading the bypass and providing a railway station and other considerations to improve infrastructure will not occur but that the building will go ahead anyway.	4200/10938	
	Objection – no mention of infrastructure like education, roads, water surface drainage, traffic congestion that will accrue in and around Haxby Town on narrow country roads which are totally inadequate for the number of residents currently present, let alone ones envisaged in the Plan.	4253/11061	
	Objection – infrastructure normally follows development and there would appear to be no mention as to either how or when this would be developed. Funding for such developments is not clearly defined. Is this to be government backed, developer financed or are the Council Tax payers expected to make good?	4275/11090	
	Comment – queries whether the overall infrastructure can support the planned new developments.	4284/11112	

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy IDC1 Infrastructure And Developer Contributions Continued	Objection – see response 11	4651/11781	
	Objection – see response 11	4652/11787	
	Objection – see response 11	4653/11793	
	Objection – see response 11	4654/11799	
	Objection – see response 11	4655/11805	
	Objection – see response 11	4656/11811	
	Objection – see response 11	4657/11817	
	Objection – see response 11	4658/11823	
	Objection – see response 11	4659/11829	
	Objection – see response 11	4660/11835	
	Objection – see response 11	4661/11841	
	Objection – see response 11	4662/11847	
	Objection – see response 11	4663/11853	
	Support – see response 11	4664/11865	
	Objection – see response 11	4665/11859	
	Objection – see response 11	4666/11870	
	Objection – see response 11	4667/11876	
	Objection – see response 11	4668/11882	
	Objection – see response 11	4669/11888	
	Objection – see response 11	4670/11893	
	Objection – see response 11. The erosion of infrastructure by central government is already having dire consequences.	4671/11897	
	Objection – see response 11	4672/11902	
	Objection – see response 11	4673/11908	
	Objection – see response 11	4674/11913	
	Objection – see response 11	4675/11919	
	Objection – see response 11	4676/11925	
	Objection – see response 11	4677/11931	
	Objection – see response 11	4678/11937	
	Objection – see response 11	4679/11943	
	Objection – see response 11	4680/11949	
Objection – it would appear that the infrastructure has not been thought about at all in this first draft. This in itself is a major cause for concern. Surely any initial planning should be in terms of an end product with all major elements included.	4681/11957		

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy IDC1 Infrastructure And Developer Contributions Continued	Objection – see response 11	4682/11962	
	Objection – see response 11	4683/11968	
	Objection – see response 11	4684/11974	
	<p>Comment – how will the green infrastructure get off the ground and consulted on if funding is not found? No mention of Biodiversity offsetting developer contributions. Section 106 orders do not work effectively and there is little or no policing which lowers standards - all due to CYC staffing cuts and the lack of training for the new skills required.</p> <p>Objection – evidence base – Infrastructure Delivery Plan (IDP) – paragraph 4.126 states that Green Infrastructure cuts across most documents and refers to multiple benefits but does not deliver on it. Evidence collated by the York Environment Form, Treemendous York and other volunteers proves future infrastructure funding needs will not come from intended resources to prepare a green infrastructure strategy and operate it on new capital projects and action plans, also to improve and maintain to the necessary Natural England standards. Where will it come from?</p>	4819/14311	York Environment Forum (Natural Environment Sub Group) & Treemendous York
	<p>Support – agree with the preferred approach to infrastructure and developer contributions.</p> <p>Comment – whilst accepting the principles in the preferred approach a policy needs to be developed through the Neighbourhood Plan mechanism that establishes the principle that Parishes should have a right to determine where and how some of the Section 106, Community Infrastructure Levy (CIL) and other monies resulting from developments in their area are spent.</p>	5178/12376	
	Comment - developers contributions sounds like bribery.	5228/12541	
	<p>Objection - the preferred approach is to require this infrastructure to be in place 'prior to development'. This approach will not be feasible for some of the strategic sites, given the substantial upfront costs in providing infrastructure. Policy IDC1 should be amended to refer to phasing. The following text is suggested: 'In the case of the Strategic Sites, the associated infrastructure and the timescales for its delivery will be agreed on a site-by-site basis, taking into account phasing and viability.'</p>	5245/14343	Hogg Builders (York) Ltd
	<p>Objection – infrastructure is always the key element and although it may be talked about, no specifics are ever at hand. If the plan is to be taken seriously it needs to address each of the relevant infrastructure requirements, fully costed.</p>	5262/14358	
<p>Objection – the infrastructure is inadequate for current levels of traffic, improving this, even if desirable, does not look remotely viable.</p>	5264/14362		

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy IDC1 Infrastructure And Developer Contributions Continued	Objection – concerned about the impact of the local plan on schools and health care provision, the Infrastructure Delivery Plan (IDP) does not offer any reassurances that there are well thought out plans in place to deal with shortfalls in education and health care provision if further housing is built. This should be looked at more closely before any plans are potentially approved.	5696/13419	
	Objection – object to the absence of specific infrastructure development to support the proposed expansion.	5755/13605	
	Comment – who will pay for all of the new infrastructure required to ‘sustain’ the new developments? Cannot assume that developer contributions will be any more than the bare minimum.	5780/13678	
	Objection – the local plan fails to address the improvements required to the local infrastructure to accommodate the influx of population that the 20% increase in housing would cause. The infrastructure within the city limits is not capable of absorbing additional loading from the increased development that is proposed.	5800/13730	
	Objection – the plans seem to have little consideration for the impact of the people who will inhabit the new housing on the local infrastructure. Any housing developments need to go hand in hand with infrastructure improvements.	5805/13742	
	Objection – see response 11	6064/15522	
	Objection – see response 11	6065/15528	
	Objection - once Community Infrastructure Levy (CIL) is adopted this should be the only tool for collecting funds to address the cumulative impacts of development on types of infrastructure. Therefore the policy needs to explicitly explain that any funds received through section 106 agreements will relate solely to the requirements necessary to make the development acceptable in planning terms; be directly related to the development and be fairly and reasonably related in scale and kind to the development. They should not seek to rectify existing deficits or wider strategic infrastructure issues as this is the role of CIL. Whilst the supporting Infrastructure Delivery Plan is noted it is recommended that the policy be amended to clearly define how section 106 and CIL will work in practice and how the funding from each will be used to promote development.	6351/17637	Gladedale Estates
	Objection – see response 11	6505/16257	
	Objection – see response 11	6506/16263	
	Support – agree with the preferred approach to infrastructure and developer contributions. Comment – continue to believe that individual developments and their required	6508/17695	City Of York Council Conservative Group

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	contributions should be governed by general principles with each development situation analysed individually.		
Policy IDC1 Infrastructure And Developer Contributions Continued	Support – no objection to the preferred approach to infrastructure and developer contributions as it could be applied whichever growth option is adopted.	6516/16348	City Of York Council Liberal Democrat Group
	Support – agree with the preferred approach to infrastructure and developer contributions. Comment – believe that individual developments and their required contributions should be governed by general principles with each development situation analysed individually.	6519/16489	Cllr Jenny Brooks
	Objection – there seem to be no plans to ease the already over burdened and gridlocked roads by road widening or expansion.	6523/16512	
Para 25.03	Comment – does CIL cover the natural environment infrastructure funding and if not where and how will sufficient funding be found especially as biodiversity offsetting still not be in place to raise, maintain or improve standards of the natural environment?	4819/14317	York Environment Forum (Natural Environment Sub Group) & Treemendous York
Para 25.04	Comment – evidence base – Infrastructure Delivery Plan (IDP) – highly likely that an improvement to the Grimston Bar interchange will be required to accommodate City of York and East Riding’s combined development aspirations. This should be referenced in the IDP.	10/11671	East Riding of Yorkshire Council
	Comment – evidence base – IDP – Leeds City Region (LCR) authorities identified as a funding source for essential and major pieces of infrastructure. Seek clarification that it is not the intention to seek direct funding from the LCR for the provision of essential infrastructure necessary to support the plan.	11/11682	North Yorkshire County Council
	Objection – evidence base – IDP - concerned that Green Infrastructure (GI) is very poorly covered in the IDP with no overarching GI plan in place, no projects suggested, and no funding or project partners listed. The approach appears merely to be to work with developers to provide GI within developments rather than to consider how to join up areas of GI. GI will become increasingly important in the future, climate change will exacerbate the urban heat trees, green roofs and walls, and green spaces will be vital. GI can reduce the effects of intense rainfall, flooding and drought, improve health and the amount of exercise people take and also support biodiversity. In a number of ways well designed and implemented GI can save money in dealing with drainage and flooding issues and also improve health and the amount of inward investment in the city. Would expect that a definite date for the completion of a GI plan should be set and it should also include a mapping component to identify areas to enhance and	42/11724	Yorkshire Wildlife Trust

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	connect for biodiversity. Projects to fund and partners to work with should also be identified so that if the authority decides on a Community Infrastructure Levy (CIL) in the future GI will be funded and put in place. The plan will also be important if Biodiversity Offsetting becomes government policy. The Yorkshire Wildlife Trust would be happy to work with the authority on this.		
Para 25.04	Comment – where will funding come from for the green infrastructure strategy?	4819/14318	York Environment Forum (Natural Environment Sub Group) & Tremendous York

York Local Plan Preferred Options – Summary Of Responses
Section 25: Infrastructure and Developer Contributions Continued

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Question 25.01	Support – agree with the preferred approach to infrastructure and developer contributions. Comment – whilst accepting the principles of the preferred approach a policy needs to be developed through the Neighbourhood Plan mechanism that establishes the principle that Parishes should have a right to determine where and how some of Section 106, CIL and other monies resulting from developments in their area are spent.	59/12679	Dunnington Parish Council
	Comment - acknowledge that developer contributions can facilitate a more sustainable approach to development throughout the York district and that contributions would be legitimate and fair under the circumstances. It is recognised that such funding can aid the Drainage Boards in achieving local solutions on a case by case basis to facilitate development and that this policy background would specifically cover issues of drainage and flood protection. However, the Boards have a responsibility under their permissive powers for continued maintenance of adopted watercourses and other assets and could not be expected to absorb the ever increasing revenue costs of such maintenance as a result of development. This is often a strategic function that should not be undermined or hindered through the diversion of limited funding to accommodate inappropriate development. Irrespective of contributions there will inevitably be applications that are deemed to be detrimental to longer term strategic flood risk management and where those contributions could not be accepted on that basis. Conscious that current drainage infrastructure is under pressure and that there is a need to develop sites to meet the needs of the city. It would therefore be prudent and beneficial that this policy is pursued along the lines indicated and mindful of the Drainage Board’s function.	190/13988	York Consortium of Drainage Boards
	Support - the proposed approach and guidance to infrastructure and development contributions. Particularly welcome the intention to use such funding to help secure public realm improvements, protection and improvement of the historic environment and for Green Infrastructure including public open space.	238/14127	English Heritage
	Agree with the preferred approach to infrastructure and developer contributions.	943/16977	
	Agree with the preferred approach to infrastructure and developer contributions. This is the most important section in the whole plan. NPPF guidance must be adhered to. Very important that Community Infrastructure Levy (CIL) is administered by Parish Councils that reflect local communities wishes. Robust evidence, consisting of surveys and consultations must be part of the process.	1109/17223	