

**The table below sets out a summary of comments received in relation to the Plan in general, under the following themes:**

- Methodology
- General Economic Growth
- General Housing Growth
- General Growth in York (Vision)
- Housing site capacity
- Open Space/Green Infrastructure
- Green Belt (non site specific)
- Gypsies, Travellers and Showpeople
- Renewable Energy and Climate Change
- Waste and Minerals incl Fracking
- Transport, Communications Infrastructure
- Infrastructure Delivery Plan/Viability
- Residential Amenity
- Healthcare
- General area based comment (non site specific)
- Safeguarded Land (non site specific)
- General Objections
- General Comments

Responses to each theme are sorted sequentially (comment/objection/support) and then in ID order.

**Comments relating to specific policies and/or sites are summarised in their relevant Plan sections, in separate documents.**

Pre-Publication Draft Local Plan (2018) summary of consultation responses

ID	Obj/ Supp/ Comm	Summary	Named organisation/ Specific consultee
<b>Methodology</b>			
5259	Comm	Rather than a 'local plan', the consultation imposes development on us without anyone from CYC ever having visited the village to listen to what development the villagers would like. We have only ever been asked to comment on CYC proposals. Residents of Elvington have never been consulted as to what the village needs.	
5671	Comm	Supports the protection of the rural setting of York, the unique historic character of the City and its surrounding rural areas and the preservation of high quality agricultural land. However, there has been no meaningful consultation with residents as to where housing and strategic sites should be located prior to the 1st draft consultation; it relied on landowners putting forward land though no direct CYC approach was made to all landowners. This biased the process towards large, well connected landowners. CYC have given the larger sites, in single or low ownership, priority for ease of development regardless of their suitability. Further, there is still the question as to whether York, an ancient, historic City, needs a new town, rather than extending existing settlements. There are outlying local villages that are losing local services - moderate development in these areas would build houses where they are much needed to ensure their survival and community spirit.	
145	Obj	Strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. In principle, the use of gross to net ratios for sites is considered appropriate. However the use of 70% for large strategic sites may be an over-estimate given the significant infrastructure contributions that are likely to be required. It is considered that it is more appropriate for the Council to continue to work with site promoters, owners or developers to ensure appropriate numbers are used.	Home Builders Federation
9254	obj	There is a lack of evidence underpinning decisions. Considered that the historic character and setting evidence base is out-of-date and cannot be relied upon. Lack of an up-to-date evidence base to support the plan and the site allocations would render the plan unsound. Several strategic sites have significant issues.	How Planning on behalf of Barwood Strategic Land LLP

Pre-Publication Draft Local Plan (2018) summary of consultation responses

9888	Obj	The Spatial Strategy contains no narrative as to how or why the Council arrived at this approach, not does it set out the implications of this pattern of spatial distribution or discuss the alternatives.	Johnson Mowat on behalf of KCS Development Ltd
10121	Obj	The Spatial Strategy contains no narrative as to how or why the Council arrived at this approach, not does it set out the implications of this pattern of spatial distribution or discuss the alternatives.	Johnson Mowat on behalf of Vernon and Co.
12922	Obj	Concern over the granting of outline planning permission for 70 houses on land at Windmill Lane-Hull Road (site H56) in advance of the of the Local Plan. This green wedge was previously open space. Concern as the land was made available to York St John for sporting and community uses in the 1930's by the Deramore Estate not for 70 houses. Concern over the substitute space at Haxby Road Sports field and the distance of 15 minutes. A walk by Save-Our-Space campaigners proved it took much longer to cover the near three-mile route to the University's Haxby Road sports fields - the substitute offered by York St John. This has been amended to 20 minutes by public transport in the site selection methodology again without consultation or explanation. This does not take regard for the fact that it could involve changing buses and not everyone will have the same start point.	
13030	Obj	The justification for the selection of the chosen sites, and the discounting of reasonable alternatives, is unclear. There is no single analysis which presents a comparative assessment of all of the site options working to a consistent sustainability criteria and there is no evidence that sites have considered on an equal footing. It is incumbent upon the Council to present clear evidence and justification for its decisions. The site selection evidence simply does not provide this, with inconsistencies and contradictions throughout. This issue alone is likely to mean that the plan is not capable of being found to be unsound. The 2013 Site Selection Paper sets out the process of appraising the sustainability of sites considered for development. This comprised 4 criteria. Criterion 4a and 4b relate to access to services and sustainable transport. Paragraph 15.1 of the paper states that sites over 100 ha in size and capable of accommodating more than 3,000 units were not assessed against this criteria 4a and 4b on the basis that they are large enough to provide this infrastructure as part of the development (i.e. they effectively satisfy the criterion without further assessment)	Turley representing Gallagher Estates

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13030	Obj	<p>The representor notes that none of the new settlement options now proposed as part of the Draft Local Plan will provide 3,000 residential units over the plan period, with the largest (Allocation ST5) assumed to provide 2,200 units over the plan period. These sites do not provide the critical mass of residential development to fund the provision of the full suite of community and sustainable transport infrastructure needed for these settlements to become sustainable places, in accordance with the Council's own assessment criteria. The inclusion of these sites is therefore unsound. Urban extensions should be assessed on a different basis to new settlements. Sites comprising as little as say 300- 400 residential units can offer the potential to fund improvements to existing local infrastructure in order to improve the sustainability credentials of the site and to improve the accessibility to such facilities for existing residents.</p>	Turley representing Gallagher Estates
13030	Obj	<p>As part of the site appraisal process undertaken by the Council, sites which are deemed to fall wholly within one or more areas identified as forming part of the historic setting and character of the City were discounted and not subject to further consideration, with some isolated exceptions. The approach is summarised at paragraph 9.2 of the 2013 Site Selection report:  <i>'The Approach to the Green Belt Appraisal (2003) study carried out by the Council indicates that, regardless of the extent to which the City may have to identify further land to meet its development requirements and needs, there are areas of land outside the existing built up areas that should be retained as open land due to their role in preserving the historic character and setting of York.'</i> This approach is at odds with the guidance provided at paragraph 84 of the NPPF. In this regard it is unreasonable and inconsistent with national planning policy to treat sites which are deemed to be within the rural setting of York in the same manner as sites within Flood Zone 3b or areas of ancient woodland for example, as the Council has done.</p>	Turley representing Gallagher Estates
13030	Obj	<p>Whilst fully acknowledging the need for a considered and cautious approach to sites immediately surrounding the urban area of York, the Representor does not agree with the Council's contention that sites which fall within areas 'retaining rural setting' are sacrosanct and should automatically be discounted as part of the site appraisal process. In this regard it is unreasonable and inconsistent with national planning policy to treat sites which are deemed to be within the rural setting of York in the same manner as sites within Flood Zone 3b or areas of ancient woodland for example, as the Council has done.</p>	Turley representing Gallagher Estates

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13030	Obj	<p>Given the presence of the York ring road, the rural land immediately surrounding the main urban area makes a much lesser contribution to purposes 1 and 3 of the NPPF Green Belt purposes (namely 'to check the unrestricted sprawl of the built up area' and 'to assist in safeguarding the countryside from encroachment') than other areas of open land. In this regard, the ring road functions as a physical defensible boundary to more open areas of countryside beyond. This is given no consideration in the Council's appraisal of sites and this approach is unjustified. No site can be justifiably discounted before a consideration of the wider sustainability benefits which might arise through its development unless a clear direction to this effect is provided in the NPPF. In the context of paragraph 84, and in respect of sites deemed to perform a specific Green Belt function, no such direction is provided. All sites, irrespective of their assumed Green Belt function, need to be subject to a full sustainability appraisal, with appropriate weighting given to each dimension of sustainability.</p>	Turley representing Gallagher Estates
13030	Obj	<p>Attention is drawn the letter issued by the Inspectors in respect of the Cambridge City and South Cambridgeshire Local Plan Examinations. This highlights weaknesses in the Councils' evidence base and justification for rejecting the selection of sites on the urban edge of the main settlements on the basis of these being more sensitive to development in Green Belt terms, without a counter assessment of the sustainability benefits which would be derived from their release. The issues presented in this letter are very similar to those present in respect of the York Local Plan and centre on the premature and unjustified rejection of site options based on a narrow appraisal (limited to a single topic area) of sustainability. York Local Plan is very clearly at risk of being found to be unsound on a similar basis to the Cambridge City and South Cambridgeshire Local Plans in falling foul of the same issue. The Council's appraisal therefore represents a flawed approach to the selection of sites at odds with the NPPF and the Plan is unsound as a result</p>	Turley representing Gallagher Estates
13030	Obj	<p>The publication of a proper Green Belt Assessment is a critical part of the evidence base for the development of the Local Plan. Without this, it is not possible to identify how the Green Belt should be defined through the Local Plan nor to identify sites and areas of land which may be capable of being developed with affecting the ability of the retained open land from fulfilling a Green Belt function in the long term. The Preferred Sites Paper published for consultation in 2016 confirmed that work is 'ongoing' to look at the parcels of land around York to understand their significance and contribution against Green Belt purposes set out in the NPPF. No further work has been published by the Council as part of the Draft Local Plan consultation and so at this juncture, it remains the case that the Council has failed to publish a Green Belt Assessment to inform the selection of sites for allocation. This is a key legal deficiency and fundamental flaw in the plan making process.</p>	Turley representing Gallagher Estates

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13030	Obj	The Local Plan will need to reconsider the categorisation of open land inside the ring road and its Green Belt function given the incorrect characterisation of selected areas of land as forming part of the historic setting and character of York. The Council and will need to reappraise land which is deemed to contribute to the historic setting and character of York and its suitability to accommodate development in a sustainable manner (based on all dimensions of sustainability) in accordance with the requirements of paragraph 84 of the NPPF.	
13103	Obj	The Spatial Strategy contains no narrative as to how or why the Council arrived at this approach, not does it set out the implications of this pattern of spatial distribution or discuss the alternatives.	Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees
13104	Obj	The Spatial Strategy contains no narrative as to how or why the Council arrived at this approach, not does it set out the implications of this pattern of spatial distribution or discuss the alternatives.	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
13411	Obj	Suggest that an evidence base study is undertaken of the economic and other benefits of the best and most versatile agricultural land within the district.	Pilcher Homes Ltd
13426	Obj	Object to the designation of H56 which was changed from open space to general housing without any consultation or notification and in breach of guidelines and criteria.	
13653	Obj	The Spatial Strategy contains no narrative as to how or why the Council arrived at this approach, not does it set out the implications of this pattern of spatial distribution or discuss the alternatives.	Johnson Mowat on behalf of Yorvik Homes
NDM2	Obj	Thousands of new homes on greenfield land should not be allowed.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

60	Supp	<p>Earswick PC wish to support latest draft LP whereby safeguarded land is no longer designated. Also the protection of environmental assets (including those of historic character and setting, nature and conservation); protection of open space and prevention of coalescence of villages and/or main urban areas. Also support setting a detailed green belt boundary - CYC should also consider the period beyond the plan period to 2037 - a requirement of the NPPF. Earswick PC note that the plan echoes the wishes expressed by residents in the last round of consultation to;</p> <ul style="list-style-type: none"> <li>*protect as much green belt as possible</li> <li>*retain agricultural land with open views to the countryside</li> <li>*maintain the character and individuality of our ancient villages</li> <li>*mitigate overloading of infrastructure and public services</li> <li>*prevent traffic congestion and consequential environmental pollution on routes into/out of city</li> </ul>	Earswick Parish Council
62	Supp	<p>Supports not identifying specific areas of safeguarded land for longer-term development requirements which is considered justified in the particular circumstances of York.</p>	Fulford Parish Council
238	Supp	<p>Over the past few years the Council has undertaken a great deal of work to identify the various elements which contribute to the special character and setting of the historic City. This work, the Heritage Topic Paper, has helped to provide a framework against which to consider not only the appropriateness of the development strategy for the future growth of the City, but also the individual sites where that growth may be accommodated. We welcome the summary of the Six Principle Characteristics which contribute towards York's special character and setting and illustrates how the various elements of the Plan are intended to safeguard or reinforce these characteristics.</p>	Historic England
13323	supp	<p>Support the use of brownfield sites to deliver homes.</p>	

General Economic Growth			
10292	Obj	There isn't enough employment in York at the moment.	
13103	Comm	Paras 1.34 and 4.2 both make reference to jobs growth forecast although it is unclear which forecast has been used to calculate the housing requirement.	Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees
13104	Comm	Paras 1.34 and 4.2 both make reference to jobs growth forecast although it is unclear which forecast has been used to calculate the housing requirement.	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
13635	Obj	The representor fundamentally disagrees with the cautious approach using the baseline forecast to inform the employment land requirements of the Plan, because of uncertainties in long term economic forecasting. As Green Belt Boundaries are being defined for the first time the Plan should exclude enough land from the Green Belt to cater for anticipated and unexpected development needs for at least 10 years beyond the Plan period, not 5 years as proposed.	O'Neill Associates on behalf of Malton Road Developments Ltd.
13653	Comm	Paras 1.34 and 4.2 both make reference to jobs growth forecast although it is unclear which forecast has been used to calculate the housing requirement.	Johnson Mowat on behalf of Yorvik Homes



General Housing Growth			
10	Comm	Government has suggested that the agreed HMA (housing market area] would represent an appropriate basis for preparing a statement of common ground [SOCG] between local planning authorities. East Riding of Yorkshire Council (ERC) supports the identification of the York HMA, which combines the administrative areas of City of York Council and Selby District Council. This would form the most appropriate basis for any future SOCG covering the scale and distribution of housing growth. It may also be useful to consider references to specific cross-boundary infrastructure priorities, such as improvements to the Grimston Bar junction, which are relevant to other authorities outside the HMA.	East Riding of Yorkshire Council
59	Comm	The Parish Council would strongly oppose any proposals which would increase further the housing numbers beyond those included within the pre-publication draft.	Dunnington Parish Council
187	Comm	In the 12 months since the Chambers' previous representations, the Government has published a consultation document on a methodology for assessing housing need that every Local Planning Authority would have to use when preparing a Local Plan. Along with the Consultation Paper the Government included a calculation of the housing requirement for each local authority in the country. The calculation for York was a housing requirement of 1,070 dwellings per annum as the starting point.	York and North Yorkshire Chamber of Commerce
384	Comm	The current plan fails to provide enough housing, particularly affordable/social housing. And falls massively short of the Governments evaluation of 1070 homes per year and ignores CYCs own officers and consultants advice for a minimum 10% uplift. There should be a greater front loading of the future housing allocations to address extreme housing pressures.	York TUC
431	Comm	In order to achieve a balance between the housing requirement and housing supply the requirement would have to fall significantly. Based on the evidence prepared for the Local Plan, this scenario is highly unlikely. Alternatively, the requirement / supply balance could be achieved by a rapid increase in the supply of deliverable sites in the 5-year period. Again, on the basis of the evidence available this is less likely because a significant proportion of the draft housing allocations are large sites that will take several years before they deliver a significant increase in housing supply.	O'Neill Planning Consultants Representing Shepherd Homes
1675i	comm	Although the DCLG document carries not weight for now, it is clear that the Governments figure (even without employment growth) is higher than that in the Pre Publication draft plan and broadly similar to the SHMA evidence. Although affordable housing issues are noted in para 1.46, this issue is not reflected in the housing requirement.	Johnson Mowat on behalf of Taylor Wimpey
5151	Comm	Build high quality environmentally friendly dense social housing of different types and mix. Building in the city or close to it with good transport infrastructure would obviate the need for commuting by car. This in turn would avoid overloading the surrounding already busy roads (A64, A19, A59) and there would be less pollution by noise and fumes. Productive agricultural land should be avoided.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

5689	Comm	Once again the plan will be delayed further by the governments new consultation on changing the housing need calculation, to factor in house prices. It is hoped so.	
9254	Comm	It has not been possible to assess deliverability and density in detail as the Council's assumptions and detailed trajectory have not been released.	How Planning on behalf of Barwood Strategic Land LLP
9883iv	Comm	In order to achieve a balance between the housing requirement and housing supply the requirement would have to fall significantly. Based on the evidence prepared for the Local Plan, this scenario is highly unlikely. Alternatively, the requirement / supply balance could be achieved by a rapid increase in the supply of deliverable sites in the 5-year period. Again, on the basis of the evidence available this is less likely because a significant proportion of the draft housing allocations are large sites that will take several years before they deliver a significant increase in housing supply.	O'Neill Planning Consultants representing SBO Lands Ltd.
10297	Comm	York needs many more houses. Notes that Haxby can accommodate a great many more, even more than the 750 or so in the plan. We can no longer employ a 'NIMBY' attitude as the needs of the many outweigh the wishes of the few.	
12284	Comm	The plan should include more homes - the council has underestimated demand. Disappointed that the council has ignored planning consultants advise. More affordable and social homes should be built.	
12389	comm	This representation refers to previous consultation (2016) wherein developers expressed that the OAHN was too low and the majority supported a higher figure. The government's proposed standard methodology figure of 1070 dpa is 20% higher than proposed OAHN which is consistent with this view.	
12655	comm	The Governments announcement could result in an increased housing target for York by an additional 203 dpa to 1070 dpa meaning an additional requirement for 2,030 dwellings over the 10 year period 2016-2026.	GVA on behalf of DIO Estates (MOD)
13003	Comm	Many parts of the local economy are experiencing skill shortages, so in sequencing planning, it is vital to ensure that housing provision keeps pace with economic demand.	Rachael Maskell MP

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13030	Comm	<p>The Representer acknowledges that the Council has updated its evidence base to take account of the latest available data and representations, through the May 2017 publication of the 'Strategic Housing Market Assessment – Addendum Update' 1. This evidences a higher OAN for York (953 dwellings per annum) relative to that concluded in the 2016 SHMA (841dpa) and its subsequent addendum (706 – 898dpa), and is broadly considered to follow Planning Practice Guidance (PPG) and respond positively to earlier representations made by the representer and others. A technical review of the OAN concluded in the SHMA Update justifies its resultant increase in the OAN for York, indicating that its concluded need for 953 dwellings per annum at best represents the minimum level of need which should be planned for.</p>	Turley representing Gallagher Estates
13030i	Comm	<p><u>Appendix 3</u>: The Draft Plan and the Council's evidence base both agree that affordability represents an issue for the City. The ONS series of affordability tables covering each authority in England and Wales, published in March 2017, confirmed that affordability issues in York have continued to worsen even over the last year.</p>	
13030i	Comm	<p><u>Appendix 3</u> Continued: From the review of representations received following the last stage of consultation – as set out in Appendix A to the SHMA Update – that the representer's points of concern and critique were shared by others. Twelve responses were received and were considered to provide a detailed challenge to the OAN consultation, of which the response submitted by Turley is listed as one. The Representer also notes that within these responses a number of alternative OANs were proposed. The Government's current consultation on a standardised methodology for calculating OAN re-asserts the principle as to a need for adjustment to respond to evidence of affordability issues stating: <i>'There is a longstanding principle in planning policy that assessing an appropriate level of housing must address the affordability of new homes, which means in practice that projected household growth should be adjusted to take account of market signals.'</i> A mandatory upward adjustment, responding to this aspect, is proposed through Step 2 of the proposed standardised methodology, so there is an existing imperative for the OAN to take full account of issues relating to affordability.</p>	
13030i	Comm	<p><u>Appendix 3</u> continued: Reflecting on the market signals evidence presented in the SHMA Update – as well as the latest datasets – it is considered that a 10% adjustment should be considered as an absolute minimum level of adjustment required. It is considered that there is an evidenced justification for potentially suggesting a more pronounced adjustment would also be reasonable. It is noted that this scale of adjustment still falls below that indicated by the draft DCLG standardised methodology, which as noted above is closer to a 27% adjustment.</p>	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13093	comm	<p>The biggest housing issues faced in York are shortage of housing, shortage of affordable housing and shorting of housing and care homes for the elderly (requirement for 900 care home bed spaces to 2030). Housing calculation including a backlog has implications for the Green belt boundary. An Assessment of Housing Need prepared by Nathaniel Litchfields and Partners (2016) submitted previously suggested that the OAHN for York was in the range 1125 dpa and 1255 dpa. Using this range would have ensured compliance against paragraphs 19 and 47 of NPPF. The requirement/supply balance could be achieved by a rapid increase in the supply of deliverable sites within the first 5 years of the plan.</p>	O'Neill Associates on behalf of Jorvik Homes
13099	comm	<p>The biggest housing issues faced in York are shortage of housing, shortage of affordable housing and shorting of housing and care homes for the elderly (requirement for 900 care home bed spaces to 2030). Housing calculation including a backlog has implications for the Green belt boundary. An Assessment of Housing Need prepared by Nathaniel Litchfields and Partners (2016) submitted previously suggested that the OAHN for York was in the range 1125 dpa and 1255 dpa. Using this range would have ensured compliance against paragraphs 19 and 47 of NPPF. The requirement/supply balance could be achieved by a rapid increase in the supply of deliverable sites within the first 5 years of the plan.</p>	O'Neills Associates on behalf of Galtrees Garden Village Development Company
13103	Comm	<p>Support reference to 'notable affordable housing need' and affordability concerns but this has not been taken forward into the housing requirement number.</p>	Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees
13104	Comm	<p>Support reference to 'notable affordable housing need' and affordability concerns but this has not been taken forward into the housing requirement number.</p>	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
13204	Comm	<p>The representor notes that York has not applied the 10 percent market signals adjustment as recommended in the York 2017 Strategic Housing Market Assessment. This market adjustment was recommended based on an assessment of both market signals and affordable housing need.</p>	Leeds City Region Local Enterprise Partnership

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13205	Comm	Past issues with under delivery of housing together with recent market signals for York, mean that it will be essential to achieve the proposed minimum annual provision of 867.	York, North Yorkshire and East Riding LEP
13182	Comm	The representor notes that all 10 recommendations that were included within the Local Plan Working Group report were approved by members of the Executive Board, which the exception of adding a 10% uplift to the revised OAN figure for market signals. Despite the evidence that was presented to Executive Board, members requested that the 10% uplift for market signals be removed and that the revised baseline figure of 867 dwellings be taken forward as the Council's OAN figure. As a result of the proposed increase in the housing target, the Local Plan Working Group were also proposing to make amendments to proposed housing allocations which are within the control of the representor's Client, which would have assisted in achieving the higher OAN. The Department for Communities and Local Government (DCLG) recently published a document entitled 'Planning for the Right Homes in the Right Places'. One of the key components of the document is the proposed standardised methodology for calculating OAN. With specific regard to York, the most current publicly available data states that there is an annual housing requirement of 867 dwellings. However, if the standardised methodology is used, the figure rises to 1,070 dwellings per annum.	Barton Wilmore on Behalf of Barratt and David Wilson Homes
13401	Comm	There is something odd going on with the Local Plan - all main parties are saying how they can be entrusted as keepers of the green belt but the Plan shows the fear isn't York growing outward but villages growing in. The Plan is a weird urbanisation in reverse. New developments will encircle York and slowly rob villages of their identity. The city will become entombed by lots of mini Milton Keynes with the need for increased services to cover these areas that will erode the existing Green Belt. There should be an admission that as much as new housing is needed there is plenty of land available within the ring road. Leave the strays, river and wildlife corridors but don't plonk new villages everywhere or tag an estate onto existing villages or the only bit of green belt will be on slithers of land between York and the A64/A1237 that could be eaten up if the ring road were to be dualled.	
13458	Comm	More housing is needed in general. Rent in York is too high for many people.	
13584	Comm	The representor notes that York has not applied the 10 percent market signals adjustment as recommended in the York 2017 Strategic Housing Market Assessment. This market adjustment was recommended based on an assessment of both market signals and affordable housing need.	West Yorkshire Combined Authority
13615	Comm	The expert advice of planning consultants has been ignored. The Plan also seems to include sites that wont be ready on time (British Sugar/Imphal Barracks/Strensall Barracks) where plans for their future have not been finalised or whether these sites will even be sold. Concerned that Greenfield sites will be developed rather than protected. The Plan should prevent their use and by there being no Plan these sites are left venerable to development.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13653	Comm	Support reference to 'notable affordable housing need' and affordability concerns but this has not been taken forward into the housing requirement number.	Johnson Mowat on behalf of Yorvik Homes
42	Obj	Concern that the housing numbers proposed may not be sufficient for the plan to be acceptable to the Planning Inspectorate. If the Plan is not acceptable this will lead to delays and pressure from developers.	Yorkshire Wildlife Trust
42	Obj	The paragraphs maintain that there is no alternative to a large development at ST15 and that other possibilities have been examined and rejected. However it is suggested that a combination of other sites could deliver similar number of houses. Not convinced that ST15 is the only possible large allocation in the position shown. The site could be moved further north, a position and configuration similar to the 2014 consultation or there could be an expansion of ST7 and ST14.	Yorkshire Wildlife Trust
62	Obj	Supports the reduction in the housing and employment requirements for the city from the unrealistically high figures set out in the 2014 Submission Draft. However, considers that these requirements are still set too high and further reductions should be made.	Fulford Parish Council
187	Obj	The Chamber is concerned that the Council is taking the wrong approach in that it is aiming to provide the minimum level of housing at 867 dwellings per annum which is considerably less than the 953 dwellings per annum recommended by the Council's consultants G L Hearne. Failure to meet housing need has significant direct and indirect negative impacts. The chamber is particularly at the scale of the backlog in house provision in recent years and believes the Council has adopted the wrong approach in estimating housing commitments, housing backlog and the inclusion of student housing in the backlog and housing commitments.	York and North Yorkshire Chamber of Commerce

Pre-Publication Draft Local Plan (2018) summary of consultation responses

431	Obj	<p>Consider the assessment of the housing requirement and the housing allocations set out in the Draft Plan to be inadequate for the following reasons:</p> <ul style="list-style-type: none"> <li>(i) The housing requirement is too low;</li> <li>(ii) The calculation of completions since 2012 is too high (i.e. the Councils estimate of backlog is too low)</li> <li>(iii) Outstanding commitments includes student housing that should be excluded</li> <li>(iv) The assumptions on windfalls are questionable and should not be treated as a component of the Plan.</li> </ul> <p>The updated housing requirement as reported to the Local Plan Working Group (LPWG) on the 10th July 2017, identified an annual housing requirement of 953 dwellings per annum composed of a Demographic baseline of 867 dwellings; and an adjustment for ‘market signals’ of 10%, based on evidence provided by the Council’s own consultants in the Draft Strategic Housing Market Assessment. Members did not agree with this assessment of the housing requirement presented by officers and set the housing requirement at 867 dwellings per annum.</p>	O'Neill Planning Consultants Representing Shepherd Homes
431	Obj	<p>The Council has underestimated the scale of the backlog and the Council’s annual allowance of 56 dwellings included for backlog, amounting to 840 over the 15-year plan Period, is too low. To calculate the backlog, our assessment uses the figure of 953 as this is the housing requirement figure recommend by the Council’s independent Consultants, G L Hearn for the period from 2012. The Local Plan must demonstrate it can provide deliverable sites for the 5-year tranches within the plan period. Government guidance advises that the calculation of the 5-year supply must take account of any shortfall from previous years. A high proportion of the total number of dwellings to be delivered over the plan period will be derived from the 19 strategic sites. However, there is no real certainty over the rate of delivery that can be achieved on some of these sites. Providing additional allocations that include sites that can deliver homes in the first 5 years of the plan period will assist in addressing the shortfall between the housing requirement and housing supply.</p>	O'Neill Planning Consultants Representing Shepherd Homes

Pre-Publication Draft Local Plan (2018) summary of consultation responses

431	Obj	<p>Housing completion data contained within the Council’s Annual Housing Monitoring Updates revealed that after many years of under provision, completion figures for the year 2015/16 suggested a surplus. However, the completion figure of 1,121 for 2015/16 includes 579 purpose built student accommodation units. Likewise, the completions figure of 977 for 2016/17 must be adjusted to exclude 152 student units. The Council has included the student units in their completion and commitments figures based on the definition of dwelling units used in the DCLG General Definition of Housing Terms. Government Planning Practice Guidance (which is more recent than the DCLG dwelling definition) is that student accommodation units can only be included within the housing supply “...based on the amount of accommodation it releases in the housing market.” ( Reference ID: 3-038-20140306).</p>	O'Neill Planning Consultants Representing Shepherd Homes
431	Obj	<p>The Council has not produced any evidence to demonstrate how market housing supply has been increased by students transferring from traditional private sector shared housing. Indeed, the available evidence presented in the City of York Council Strategic Housing Market Assessment June 2016 is that new purpose-built student accommodation has not displaced students from market or family housing. The Council has not demonstrated that students form part of the objectively assessed housing need nor demonstrated that new student housing accommodation would contribute towards meeting the housing requirement. Case law has established that in these circumstances purpose built student accommodation cannot count towards the housing supply Exeter City Council v Secretary of State for Communities and Local Government, Waddeton Park Limited, The R B Nelder Trust. Case No: CO/5738/2104. Removing these 579 student units from the completions data reduces the completions for 2015/16 to 542. Likewise removing the 152 student units from 2016/17 data reduces the completions for that year to 825. These are the figures used in the representor's calculation of the backlog.</p>	O'Neill Planning Consultants Representing Shepherd Homes
431	Obj	<p>In the list of the planning permissions that make up the Council’s estimate of un-implemented planning permissions, the figure of 3,578 includes 542 student units which should not be included in the housing provision figures. This reduces the commitments figure to 3,036. A further discount of 10% should be applied to account for non-implementation of a proportion of these commitments, giving a more robust figure of 2,732 dwellings for outstanding commitments.</p>	O'Neill Planning Consultants Representing Shepherd Homes
431	Obj	<p>The Council has not produced any evidence to demonstrate how market housing supply has been increased by students transferring from traditional private sector shared housing. Indeed, the available evidence presented in the City of York Council Strategic Housing Market Assessment June 2016 is that new purpose-built student accommodation has not displaced students from market or family housing.</p>	O'Neill Planning Consultants Representing Shepherd Homes



Pre-Publication Draft Local Plan (2018) summary of consultation responses

536	Obj	The Plan sets out a minimum of 867 dwellings per annum, equating to an overall requirement of 13,005 across the Plan period. This is derived from the SHMA which found established 867 as the baseline figure. However the 2017 SHMA update added a 10% uplift should be added, taking the figure to 953 per annum to take account of market signals. This uplift was rejected by the Council's Executive, making the Plan not in accordance with the evidence base. This risks the Plan being found unsound at Examination.	Lichfields obo Keyland Developments
540	Obj	The provision currently included in the draft Plan does not reflect the evidence provided by the Council's own consultants or the recently published national methodology for calculating housing need. Additional housing sites will almost certainly be needed to meet the requirement when properly recalculated, particularly since the Plan proposes that housing needs should be met entirely within the Council's administrative area. Additional small and medium sized sites need to be allocated to ensure delivery of the requirement. Rep has attached presentation pack delivered to the House of Commons Communities and Local Government Committee in September 2016 on behalf of Daniel Gath Homes and a Press Notice of the Committee Report (29th April 2017) which consider the issues.	Jennifer Hubbard Town Planning Consultant
554	Obj	A full assessment of the Councils approach to its assessment of housing need has been submitted in a separate report by Lichfields (City of York Local Plan Pre- Publication Draft - Technical Report on Housing Issues, October 2017). It is against the back drop of the findings in this report and the councils failure to plan for it OAHN that the comments are made. The plan aspires to deliver a minimum of annual provision of 867 new dwellings over the plan period 2032/33 and post plan period to 2037/38. This figure falls significantly short of what a full assessment of OAHN would likely to include. The true need is nearer to 1150 units per annum, a figure 25% higher than the unevidenced figure. The 867 figure is incorrect and ignores both the NPPF and GL Hearn evidence base. The plan will be found unsound on this alone.	Persimmon Homes (Yorkshire) Ltd
764	Obj	Objects to housing numbers, which are below consultants advice of 953/yr (inclusive of 573/yr affordable). This represents over 50% of all homes being affordable, and council policy is currently 20% bf and 30% gf.	
1352	obj	The OAHN needs ot be revisited. The OAHN does not accord with national policy or guidance. The Council is not providing sufficient land to meet the housing needs of the City and further sites should be allocated for development to make up the shortfall identified.	Lichfields on behalf of Wakeford Properties

Pre-Publication Draft Local Plan (2018) summary of consultation responses

1352	obj	The 867 dpa does not reflect GL Hearn's acceptance of an increase in household formation rates. The respondent agrees with making this change and it is therefore illogical to not apply the adjusted rates. The SHMA (2017) fails to distinguish between market and affordable homes and mixes this with market uplift figure resulting in a conflated figure which is lower than the level of uplift required. Guidance is clear that the worse affordability issues are, the larger the additional supply response should be. A 20% rather than 10% uplift is considered more appropriate and should be applied to the OAHN.	Lichfields on behalf of Wakeford Properties
1355	Obj	The York Outer Ring Road is already over capacity and views have been expressed clearly over a number of years about the need for upgrades. Proposals in the Local Plan, particularly the land west of Wigginton Road, North of Monks Cross and North of Haxby will place even greater strain on the A1237, concerns remain about the level of development north of the city.	Julian Sturdy MP
1498	obj	The 867 dpa does not reflect GL Hearn's acceptance of an increase in household formation rates. The respondent agrees with making this change and it is therefore illogical to not apply the adjusted rates. The SHMA (2017) fails to distinguish between market and affordable homes and mixes this with market uplift figure resulting in a conflated figure which is lower than the level of uplift required. Guidance is clear that the worse affordability issues are, the larger the additional supply response should be. A 20% rather than 10% uplift is considered more appropriate and should be applied to the OAHN.	Lichfields on behalf of Bellway Homes
1668	obj	The Council are failing to meet their full OAHN as set out in the evidence base (953 dpa which incorporates a 10% uplift for market signals) and is therefore not sound when considered against the NPPF. No evidence has been provided to justify the removal of 10% uplift and it is assumed that this has been a way to reduce housing numbers. This is not a sound or robust approach. Previous OAHN assessment submitted by Barton Willmore (2016) supported a higher figure of between 920 - 1070 dwellings per annum. Also concerned about inclusion of windfalls at 19% of overall annual housing requirement. This is contrary to the legislative provision of plan-led system and should not form basis of moving forward. Also no provision of affordable housing on windfalls sites.	PBPlanning on behalf of Barratt and David Wilson Homes
1668	obj	The Council are failing to meet their full OAHN as set out in the evidence base (953 dpa which incorporates a 10% uplift for market signals) and is therefore not sound when considered against the NPPF. No evidence has been provided to justify the removal of 10% uplift and it is assumed that this has been a way to reduce housing numbers. This is not a sound or robust approach. Previous OAHN assessment submitted by Barton Willmore (2016) supported a higher figure of between 920 - 1070 dwellings per annum.	PBPlanning on behalf of Barratt and David Wilson Homes

Pre-Publication Draft Local Plan (2018) summary of consultation responses

1668	obj	Also concerned about inclusion of windfalls at 19% of overall annual housing requirement. This is contrary to the legislative provision of plan-led system and should not form basis of moving forward. Also no provision of affordable housing on windfalls sites.	PBPlanning on behalf of Barratt and David Wilson Homes
1675	obj	The document does not accurately reflect the correct OAHN in the evidence base and does not accord with national policy; it is therefore unsound. The Council's Sustainability Appraisal shows that the evidence base figure of 953 dpa is more sustainable than the 867 dpa figure taken forward in relation to SAO1: meeting the diverse housing needs for the people in a sustainable way. Alternative housing need work undertaken by consultants NLP (2017) (attached) is supported, which sets out a revised OAHN of 1,050 dpa and a five year land requirement of 1,980 dpa. It is noted that under delivery amounted to almost 23% between 2004/05 and 2013/14 and affordability continues to deteriorate; these issues warrant a market signals uplift of 20%. A Technical Report of Housing Issues by Lichfields is attached. The housing allocations only partly extend beyond 2033 and delivery significantly tails off to 2038. Given the Plan contains no Safeguarded Land and is overly tight in the provision such that it contains no flexibility in the event of a delivery failure, the Plan contains no review mechanism. In other words, it lacks any Plan B options should Plan A fail. It is therefore unsound in that the option chosen with no flexibility and overlooking key parts of the OAN evidence base are unjustified.	Johnson Mowat on behalf of Taylor Wimpey
1675	obj	The document does not accurately reflect the correct OAHN in the evidence base and does not accord with national policy; it is therefore unsound. The Council's Sustainability Appraisal shows that the evidence base figure of 953 dpa is more sustainable than the 867 dpa figure taken forward in relation to SAO1: meeting the diverse housing needs for the people in a sustainable way. Alternative housing need work undertaken by consultants NLP (2017) (attached) is supported, which sets out a revised OAHN of 1,050 dpa and a five year land requirement of 1,980 dpa. It is noted that under delivery amounted to almost 23% between 2004/05 and 2013/14 and affordability continues to deteriorate; these issues warrant a market signals uplift of 20%. A Technical Report of Housing Issues by Lichfields is attached.	Johnson Mowat on behalf of Taylor Wimpey
1705	Obj	The objective assessment should identify the full need for housing before the Council consider undertaking any process of assessing the ability to deliver this figure.	Gladman Developments

Pre-Publication Draft Local Plan (2018) summary of consultation responses

1718	Obj	<p>Surprising decision of the Local Plan Working Group to not accept GL Hearn's 953 dwelling per annum figure. The 867dpa figure is not realistic to adequately satisfy the future housing needs of the city. The position will be further exacerbated if the governments 'Planning for the Right Homes in the Right Places' consultation document becomes formal government advice. The proposed figure for York under the new formula shows an annual dwelling target of 1070dpa as opposed to the current 867dpa, which is an increase of 203dpa. There is still an overriding need for additional housing land to be identified in the city.</p>	<p>Yew Tree Associates on behalf of Daniel Garth Homes</p>
1741	obj	<p>The housing market in York has become over heated through lack of development. Brought about by the combination of a tight green belt and lack of an adopted Plan which have restricted new housing opportunities which is uncharacteristic for the region. GL Hearn's SHLA recognises these factors in arriving at a baseline OAN for housing of 867 dwellings pa. After the inclusion of market signals the OAN rises to 953 pa. However, when the draft Plan was considered at the Local Plan Working Group it was resolved to accept only the OAN baseline figure. No evidence was presented by the speakers or Committee Members to justify this outcome - as such the approach taken is unusual as councillors accept the baseline but reject market signals uplift and goes against the core planning principles of paragraph 17 of the NPPF. Since this time government has produced the Planning for the Right Homes in the Right Places paper for consultation with proposed new methodology for assessing housing need - York's figure suggested at 1,070 homes pa. CYC should seek to over-allocate to provide a robust supply adding flexibility and take account of under supply. The Plan will fail to plan positively for growth or boost housing land supply an uplift of 25% should be considered. The 20% buffer for persistent under deliver appears to have been accepted by CYC however the Sedgfield method should be used in order to deal with the shortfall. More smaller sites should be used to address the shortfall in the early years of the Plan.</p>	<p>Carter Jonas on behalf of client</p>

Pre-Publication Draft Local Plan (2018) summary of consultation responses

1741	Obj	<p>The housing market in York has become over heated through lack of development. Brought about by the combination of a tight green belt and lack of an adopted Plan which have restricted new housing opportunities which is uncharacteristic for the region. GL Hearn's SHLA recognises these factors in arriving at a baseline OAN for housing of 867 dwellings pa. After the inclusion of market signals the OAN rises to 953 pa. However, when the draft Plan was considered at the Local Plan Working Group it was resolved to accept only the OAN baseline figure. No evidence was presented by the speakers or Committee Members to justify this outcome - as such the approach taken is unusual as councillors accept the baseline but reject market signals uplift and goes against the core planning principles of paragraph 17 of the NPPF. Since this time government has produced the Planning for the Right Homes in the Right Places paper for consultation with proposed new methodology for assessing housing need - York's figure suggested at 1,070 homes pa. CYC should seek to over-allocate to provide a robust supply adding flexibility and take account of under supply. The Plan will fail to plan positively for growth or boost housing land supply an uplift of 25% should be considered.</p>	Carter Jonas on behalf of client
2412	Obj	<p>There is no indication within the Plan to indicate how CYC wish to reduce levels of deprivation within the City. Housing delivery in the Plan shows a 23.5% shortfall against DCLG housing need of 1,070 homes/year. If the Council insist on going ahead with this, deprivation, possibly leading to destitution, can be the only result. I would prefer CYC to agree with the (higher) DCLG figure, and will write to DCLG asking for the figure to be revised upwards should CYC proceed with 867/annum figure.</p>	
4159	Obj	<p>Object to the new Plan which controversially plans to build 11000 new homes in York over the next 15-20 years. The scale of which is completely unsustainable and entirely inappropriate for a historic city surrounded by greenbelt and would make York an over populated West Yorkshire suburb of Leeds. Development on inappropriate sites without the necessary investment in our infrastructure would result in the existing congestion problems rapidly deteriorating. Clearly there is a need to grow our local economy but I am opposed to the scale of development proposed.</p>	
5265	Obj	<p>The GL Hearn figures of 953 houses is sensible given the housing crisis facing the city. The proposals put forward regarding housing numbers are completely inadequate to meet the city's housing needs. It is not a plan to provide urgent needed homes but to protect the Green Belt as its first priority and for this reason should be rejected.</p>	
5265	Obj	<p>The current plan is against the advice of expert consultants. The first priority should be to provide homes for people to live in.</p>	
5710	obj	<p>Consider that 867 dpa is not a realistic housing growth figure to satisfy future requirements. This is likely to be an 'unsound' approach at examination. This will be exacerbated should the DCLG consultation standardised methodology be implemented. The timescale for producing the plan will mean that the new approach will apply.</p>	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

9210	Obj	Concerned about population increase and percentage accounted for by foreign students. Considers number of houses proposed too high as accounting to population increase. Suggests developments should be on brownfield sites first.	
9254	obj	The approach to OAHN is deeply flawed. The evidence points to strong inclusion of market signals and an uplift of 10-20% is accepted by numerous LP Inspectors. GL Hearne have not properly considered the need for economic adjustment; under the higher economic scenario should have included an uplift taking the starting point to circa 1050 dpa. Including an market signals uplift this would equate to a OAHN of 1,150 dpa. New methodologies , Local Plans Expert Group (2016) and DCLG (2017) mean OAHN of at least 1070 dpa and therefore this hould be the OAHN for York. There is no allowance for flexibility in the supply should 1070 dpa be used to maintain a 5 year land supply. Suitable allocation should be allocated rather than having a reliance on windfalls; These are considered to be a finite resource with no guarantee of delivery. Windfalls could provide flexibility on top of allocations. Delivery of windfalls is higher than would be if plan-led approach to development was functioning properly. Recommended that a 10% reduction is applied in line with other authorities.	How Planning on behalf of Barwood Strategic Land LLP
9381	obj	Do not think that windfalls should be relied upon as a source of supply. It should not inform the source of safeguarded land.	DPP Planning on behalf of Linden Homes
9381	obj	The Local Plan does not provide sufficient housing land to meet a properly formulated assessment of objective need and those sites identified do not provide a wide choice of outlets. N this basis we consider the plan to be unsound and will not be effective. Evidence base produced by Lichfields is attached. This sets out that the 867 dpa does not reflect GL Hearn's acceptance of an increase in household formation rates. Lichfields agree with making this change and it is therefore illogical to not apply the adjusted rates. The SHMA (2017) fails to distinguish between market and affordable homes and mixes this with market uplift figure resulting in a conflated figure which is lower than the level of uplift required. Guidance is clear that the worse affordability issues are, the larger the additional supply response should be. A 20% rather than 10% uplift is considered more appropriate and should be applied to the OAHN. This would provide a final OAHN total of 1150 dpa. Lack of sites and safeguarded land will stifle housing growth.	DPP Planning on behalf of Linden Homes

Pre-Publication Draft Local Plan (2018) summary of consultation responses

9883	Obj	<p>Consider the assessment of the housing requirement and the housing allocations set out in the Draft Plan to be inadequate for the following reasons:</p> <ul style="list-style-type: none"> <li>(i) The housing requirement is too low;</li> <li>(ii) The calculation of completions since 2012 is too high (i.e. the Councils estimate of backlog is too low)</li> <li>(iii) Outstanding commitments includes student housing that should be excluded</li> <li>(iv) The assumptions on windfalls are questionable and should not be treated as a component of the Plan.</li> </ul> <p>The updated housing requirement as reported to the Local Plan Working Group (LPWG) on the 10th July 2017, identified an annual housing requirement of 953 dwellings per annum composed of a Demographic baseline of 867 dwellings; and an adjustment for 'market signals' of 10%, based on evidence provided by the Council's own consultants in the Draft Strategic Housing Market Assessment. Members did not agree with this assessment of the housing requirement presented by officers and set the housing requirement at 867 dwellings per annum.</p>	O'Neill Planning Consultants representing SBO Lands Ltd.
9883	Obj	<p>The Representor's representations to the preferred Sites Consultation 2016 included an Assessment of Housing Need by Nathaniel Lichfield and Partners that found that the OAHN for the City of York was between 1,125 dwellings per annum (dpa) and 1,255 dpa.</p>	O'Neill Planning Consultants representing SBO Lands Ltd.
9883	Obj	<p>The Council has underestimated the scale of the backlog and the Council's annual allowance of 56 dwellings included for backlog, amounting to 840 over the 15-year plan Period, is too low. To calculate the backlog, our assessment uses the figure of 953 as this is the housing requirement figure recommend by the Council's independent Consultants, G L Hearn for the period from 2012. The Local Plan must demonstrate it can provide deliverable sites for the 5-year tranches within the plan period. Government guidance advises that the calculation of the 5-year supply must take account of any shortfall from previous years. A high proportion of the total number of dwellings to be delivered over the plan period will be derived from the 19 strategic sites. However, there is no real certainty over the rate of delivery that can be achieved on some of these sites. Providing additional allocations that include sites that can deliver homes in the first 5 years of the plan period will assist in addressing the shortfall between the housing requirement and housing supply.</p>	O'Neill Planning Consultants representing SBO Lands Ltd.

Pre-Publication Draft Local Plan (2018) summary of consultation responses

9883	Obj	It is anticipated that the consultation process for the Draft Local Plan will establish that a number of sites allocated for housing are not viable or deliverable within the plan period. Consequently, alternative sites will need to be allocated by the Council in order to meet its housing targets for the Plan period.	O'Neill Planning Consultants representing SBO Lands Ltd.
9883	Obj	Housing completion data contained within the Council's Annual Housing Monitoring Updates revealed that after many years of under provision, completion figures for the year 2015/16 suggested a surplus. However, the completion figure of 1,121 for 2015/16 includes 579 purpose built student accommodation units. Likewise, the completions figure of 977 for 2016/17 must be adjusted to exclude 152 student units. The Council has included the student units in their completion and commitments figures based on the definition of dwelling units used in the DCLG General Definition of Housing Terms. Government Planning Practice Guidance (which is more recent than the DCLG dwelling definition) is that student accommodation units can only be included within the housing supply "...based on the amount of accommodation it releases in the housing market." ( Reference ID: 3-038-20140306).	O'Neill Planning Consultants representing SBO Lands Ltd.
9883	Obj	The Council has not produced any evidence to demonstrate how market housing supply has been increased by students transferring from traditional private sector shared housing. Indeed, the available evidence presented in the City of York Council Strategic Housing Market Assessment June 2016 is that new purpose-built student accommodation has not displaced students from market or family housing. The Council has not demonstrated that students form part of the objectively assessed housing need nor demonstrated that new student housing accommodation would contribute towards meeting the housing requirement. Case law has established that in these circumstances purpose built student accommodation cannot count towards the housing supply Exeter City Council v Secretary of State for Communities and Local Government, Waddeton Park Limited, The R B Nelder Trust. Case No: CO/5738/2104. Removing these 579 student units from the completions data reduces the completions for 2015/16 to 542. Likewise removing the 152 student units from 2016/17 data reduces the completions for that year to 825. These are the figures used in the representor's calculation of the backlog.	O'Neill Planning Consultants representing SBO Lands Ltd.
9883	Obj	In the list of the planning permissions that make up the Council's estimate of un-implemented planning permissions, the figure of 3,578 includes 542 student units which should not be included in the housing provision figures. This reduces the commitments figure to 3,036. A further discount of 10% should be applied to account for non-implementation of a proportion of these commitments, giving a more robust figure of 2,732 dwellings for outstanding commitments.	O'Neill Planning Consultants representing SBO Lands Ltd.



Pre-Publication Draft Local Plan (2018) summary of consultation responses

9883	Obj	The Council has not produced any evidence to demonstrate how market housing supply has been increased by students transferring from traditional private sector shared housing. Indeed, the available evidence presented in the City of York Council Strategic Housing Market Assessment June 2016 is that new purpose-built student accommodation has not displaced students from market or family housing.	O'Neill Planning Consultants representing SBO Lands Ltd.
9888	Obj	Housing requirement needs to reflect the housing trajectory (Table 5.2) to recognise the housing shortfall since 2012. Concern that the Council has taken a political route in selecting the lowest possible housing number available. It is considered that a market signals uplift of 20% is warranted. Although the DCLG 2017 Housing Methodology consultation paper carries no weight, it suggests the net annual requirement is higher than the figure contained in the local plan. Concerns relating to the 5 year housing supply.	Johnson Mowat on behalf of KCS Development Ltd
10097	obj	The Local Plan does not provide sufficient housing land to meet a properly formulated assessment of objective need and those sites identified do not provide a wide choice of outlets. N this basis we consider the plan to be unsound and will not be effective. Evidence base produced by Lichfields is attached. This sets out that the 867 dpa does not reflect GL Hearn's acceptance of an increase in household formation rates. Lichfields agree with making this change and it is therefore illogical to not apply the adjusted rates. The SHMA (2017) fails to distinguish between market and affordable homes and mixes this with market uplift figure resulting in a conflated figure which is lower than the level of uplift required. Guidance is clear that the worse affordability issues are, the larger the additional supply response should be. A 20% rather than 10% uplift is considered more appropriate and should be applied to the OAHN. This would provide a final OAHN total of 1150 dpa. Lack of sites and safeguarded land will stifle housing growth.	DPP Planning on behalf of Shepherd Homes
10121	Obj	Housing requirement needs to reflect the housing trajectory (Table 5.2) to recognise the housing shortfall since 2012. Concern that the Council has taken a political route in selecting the lowest possible housing number available. It is considered that a market signals uplift of 20% is warranted. Although the DCLG 2017 Housing Methodology consultation paper carries no weight, it suggests the net annual requirement is higher than the figure contained in the local plan. Concerns relating to the 5 year housing supply.	Johnson Mowat on behalf of Vernon and Co.
10292	Obj	Why do we need more housing in York	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

12340	Obj	867 dwellings to be built per year is not enough when the government have advised 1070 in order to fulfil York's housing demand. Three sites listed are not assured for development including ST1, which is unclear on availability due to cost of cleaning up the contaminated land and issues over affordable housing. ST35 not until 2023 and ST36 not until after 2031. Sites should be assured before they are included in the plan so as to avoid an unpredictable shortfall in dwelling completions.	
12389	obj	The representation objects to the objectively assessed housing need figure approved by Members, which is considered to render the figures non-compliant with the NPPF and NPPG guidance. Consequently, they believe that the plan cannot be found sound. Support 10% market signals uplift included in OAHN and therefore the OAHN 953 dpa set out in the SHMA. Consider that this would still represent a conservative approach. Support also for inclusion of sites in Table 5, Annex 3 of the Executive Report (July 2017), particularly H37 as part of the portfolio of sites, to meet the higher OAHN figure. Support in general a wider variety of sites to meet need across the plan period instead of reliance on several strategic sites.	
12389	obj	The representation objects to the objectively assessed housing need figure approved by Members, which they consider renders the figures non-compliant with the NPPF and NPPG guidance. Consequently, they believe that the plan cannot be found sound. Support 10% market signals uplift included in OAHN and therefore the OAHN 953 dpa set out in the SHMA. Consider that this would still represent a conservative approach. Support also for inclusion of sites in Table 5, Annex 3 of the Executive Report (July 2017), particularly H37 as part of the portfolio of sites, to meet the higher OAHN figure.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

12560	obj	<p>The Local Plan does not provide sufficient housing land to meet a properly formulated assessment of objective need and those sites identified do not provide a wide choice of outlets. N this basis we consider the plan to be unsound and will not be effective.</p> <p>Evidence base produced by Lichfields is attached. This sets out that the 867 dpa does not reflect GL Hearn's acceptance of an increase in household formation rates. Lichfields agree with making this change and it is therefore illogical to not apply the adjusted rates. The SHMA (2017) fails to distinguish between market and affordable homes and mixes this with market uplift figure resulting in a conflated figure which is lower than the level of uplift required. Guidance is clear that the worse affordability issues are, the larger the additional supply response should be. A 20% rather than 10% uplift is considered more appropriate and should be applied to the OAHN. This would provide a final OAHN total of 1150 dpa.</p> <p>Lack of sites and safeguarded land will stifle housing growth.</p>	DPP on behalf of landowner
13003	Obj	<p>The Government recommend that at least 1070 homes are built a year, however the City of York Council want to build 867 of this. The Government have now made it clear that its own projections fell woefully short of need so are demanding that further progress is made, which could be a further 10% on their figures, taking York to around 1200 homes a year. It is understood that the Council leaders have rejected expert advice on these matters, including from their own consultants which they paid to undertake the work. The Plan fails to meet statutory guidelines for Local Plans in planning too few new housing units, falling far below the Government, and indeed the Council's consultants' recommendations. This will result in an under ambition in development. Around 2,500 houses are written into the Plan that should not be included for this development period because the sites are not going to be available, including British Sugar and the Barracks sites.</p>	Rachael Maskell MP
13026	obj	<p>The Council are failing to meet their full OAHN as set out in the evidence base (953 dpa which incorporates a 10% uplift for market signals) and is therefore not sound when considered against the NPPF. No evidence has been provided to justify the removal of 10% uplift and it is assumed that this has been a way to reduce housing numbers. This is not a sound or robust approach. Previous OAHN assessment submitted by Barton Willmore (2016) supported a higher figure of between 920 - 1070 dwellings per annum. Also concerned about inclusion of windfalls at 19% of overall annual housing requirement. This is contrary to the legislative provision of plan-led system and should not form basis of moving forward. Also no provision of affordable housing on windfalls sites.</p>	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13026	obj	The Council are failing to meet their full OAHN as set out in the evidence base (953 dpa which incorporates a 10% uplift for market signals) and is therefore not sound when considered against the NPPF. No evidence has been provided to justify the removal of 10% uplift and it is assumed that this has been a way to reduce housing numbers. This is not a sound or robust approach. Previous OAHN assessment submitted by Barton Willmore (2016) supported a higher figure of between 920 - 1070 dwellings per annum.	
13026	obj	Also concerned about inclusion of windfalls at 19% of overall annual housing requirement. This is contrary to the legislative provision of plan-led system and should not form basis of moving forward. Also no provision of affordable housing on windfalls sites.	
13027	obj	The Council are failing to meet their full OAHN as set out in the evidence base (953 dpa which incorporates a 10% uplift for market signals) and is therefore not sound when considered against the NPPF. No evidence has been provided to justify the removal of 10% uplift and it is assumed that this has been a way to reduce housing numbers. This is not a sound or robust approach. Previous OAHN assessment submitted by Barton Willmore (2016) supported a higher figure of between 920 - 1070 dwellings per annum. Also concerned about inclusion of windfalls at 19% of overall annual housing requirement. This is contrary to the legislative provision of plan-led system and should not form basis of moving forward. Also no provision of affordable housing on windfalls sites.	PBPlanning on behalf of David Wilson Homes.
13027	obj	The Council are failing to meet their full OAHN as set out in the evidence base (953 dpa which incorporates a 10% uplift for market signals) and is therefore not sound when considered against the NPPF. No evidence has been provided to justify the removal of 10% uplift and it is assumed that this has been a way to reduce housing numbers. This is not a sound or robust approach. Previous OAHN assessment submitted by Barton Willmore (2016) supported a higher figure of between 920 - 1070 dwellings per annum.	PBPlanning on behalf of David Wilson Homes.
13027	obj	Also concerned about inclusion of windfalls at 19% of overall annual housing requirement. This is contrary to the legislative provision of plan-led system and should not form basis of moving forward. Also no provision of affordable housing on windfalls sites.	PBPlanning on behalf of David Wilson Homes.

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13030	Obj	<p>A full critique of objectively assessed need for housing in York is provided at Appendix 3 of the Report (representation). The Council has taken the decision to disagree with its own evidence base and prefers to recognise only the housing need suggested by the 'starting point' of the 2014-based household projections, which suggest a purely trend-based demographic need of 867 dwellings per annum. Within the Plan reference is misleadingly made to an 'objectively assessed need' for 867 dwellings per annum, entirely omitting reference to the OAN for 953 dwellings per annum concluded in the SHMA Update (2017). In presenting its 'interpretation' of the OAN within the draft Local Plan the Council has dismissed necessary adjustments applied within its evidence and selected a figure derived from a partial application of the PPG methodology. In justifying the advanced OAN the Council has made a clear inference that environmental constraints in particular should moderate the Council's OAN. The approach taken by the Council is therefore fundamentally unsound.</p>	Turley representing Gallagher Estates
13030	Obj	<p>The Council has sought to accelerate its plan-making to ensure that its Local Plan is tested against this [Planning Practice] Guidance, in preference to the outcome of the new methodology currently being consulted upon by DCLG, that indicates a higher need for 1,070 dwellings per annum. It is strongly suggested that the Council should be planning to accommodate closer to 1,070 dwellings per annum. The Council's attempt to justify an OAN of only 867 dwellings per annum is unjustified, strongly challenged and must be revised prior to submission of the Local Plan in order for the housing figure to be found sound. The Local Plan will need to allocate significantly more land for residential development to meet the Local Plan housing requirement and additional land either for residential development or safeguarded for future development beyond the plan period to ensure an enduring Green Belt.</p>	Turley representing Gallagher Estates

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13093	obj	<p>The housing requirement of 867 dpa is inadequate because the requirement is too low, the calculation of completions since 2012 is too high (and backlog is therefore too low), outstanding commitments include student housing that should be excluded and windfalls should not be considered as an element to the plan. Backlog is too low because completion figures back dated to 2012 include for purpose built student accommodation units which does not conform to the NPPG. No evidence to demonstrate conformity and conflicts with SHMA (2016) which states that this type of accommodation has not displaced students from market housing (para 10.67). Five year housing supply should include additional 20% buffer for under delivery. Commitments should exclude student housing and be discounted by 10%. Windfalls should follow Scarborough DC wherein they are treated as a flexible allowance to allocations and not included in housing provision which was accepted by Inspector. Analysis is undertaken to estimate more reliable figure of overall need indicates requirement as 18114 dwellings (gross - 16,050 dwellings between 2017-2033 and a backlog of 2064), 2734 unimplemented permissions (minus student applications) with a net requirement of 15, 382 dwellings. In total the draft plan needs to allocated over 3,000 additional houses in the plan to 2033.</p>	O'Neill Associates on behalf of Jorvik Homes
13099	obj	<p>The housing requirement of 867 dpa is inadequate because the requirement is too low, the calculation of completions since 2012 is too high (and backlog is therefore too low), outstanding commitments include student housing that should be excluded and windfalls should not be considered as an element to the plan. Backlog is too low because completion figures back dated to 2012 include for purpose built student accommodation units which does not conform to the NPPG. No evidence to demonstrate conformity and conflicts with SHMA (2016) which states that this type of accommodation has not displaced students from market housing (para 10.67). Five year housing supply should include additional 20% buffer for under delivery. Commitments should exclude student housing and be discounted by 10%. Windfalls should follow Scarborough DC wherein they are treated as a flexible allowance to allocations and not included in housing provision which was accepted by Inspector. Analysis is undertaken to estimate more reliable figure of overall need indicates requirement as 18114 dwellings (gross - 16,050 dwellings between 2017-2033 and a backlog of 2064), 2734 unimplemented permissions (minus student applications) with a net requirement of 15, 382 dwellings. In total the draft plan needs to allocated over 3,000 additional houses in the plan to 2033. Evidence of housing trajectories assumed for allocations in the plan included as an appendix.</p>	O'Neills Associates on behalf of Galtrees Garden Village Development Company
13100	obj	<p>Previous evidence submitted demonstrated a housing need in York for at least 976 dwellings per annum. The housing need in York is greater than that which the draft Plan is currently planning for. There is a pressing need to deliver homes in the short-term.</p>	Quod on behalf of Sandy (York) Ltd and Oakgate/Caddick Group

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13102	Obj	<p>We are aware of modelling of housing need undertaken by NLP and others. As noted within our comments upon the Duty to Co-operate above neither the 2016 SHMA, nor its addendum have considered the implications of the LEP ambitions for growth. This should be factored into the assessment. The 2016 SHMA identifies a small increase of just 8dpa to take account of market signals, this is less than 1% of the identified OAN. Paragraph 11.34 identifies that this adjustment is made to reflect the level of suppression in household formation. We consider this uplift to be too low. The PPG, paragraph 2a-019, identifies a series of market signals which should be considered. These include land prices, house prices, rents, affordability, rates of development and overcrowding. According to the PPG a worsening trend in <b>any</b> indicator requires an upward adjustment to planned housing numbers compared to ones based solely on household projections (paragraph 2a-020). The SHMA correctly considers the majority of these signals. It is notable from the analysis that York performs poorly against rates of development and affordability. In terms of under-delivery this amounted to almost 23% of the target between 2004/5 and 2013/14 (paragraph 8.38; 2016 SHMA). If this were further updated this under-delivery would further increase. In terms of affordability this continues to deteriorate and stands significantly above the national average. These two indicators alone suggest a need for a market signals uplift. It is recognised that the 2016 SHMA applies an uplift to HRRs which may account for some of the suppression of household formation. It is, however, notable that the PPG provides a distinction between adjustments for household formation rates from any market signals uplift. (cont...)</p>	Johnson Mowat on behalf of KCS Development
-------	-----	---	--

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13102	Obj	<p>(cont...) The PPG question ‘What is the starting point to establish the need for housing?’ (ID 2a-015) is clear that the household projections plus such adjustments for issues such as household formation and the effects of under-delivery on migration represent the demographic starting point. A market signals uplift is clearly made after this starting point. The PPG clearly separates the two issues and states; “The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals” (PPG ID 2a-019). Given the signals described above it is considered that a market signals uplift of 20% is warranted. The need for such an uplift is also supported by the significant affordable housing need within York. As stated above, we are aware of the work on OAHN undertaken by others including the modelling work of NLP. We acknowledge the approach taken by NLP which we understand forms part of their submission and concludes an OAHN of at least 1,150 pa. In reviewing the various OAN options, it is clear there is no sound evidential approach to adopting the 867 dpa figure. The range of alternatives are:- 1) Local Plan text Policy SS1 867 dpa 2) Policy SS1 corrected for early years shortfall 923 dpa 3) 2017 SHMA recommendation = early years shortfall 996 dpa 4) DCLG Consultation Housing Methodology 1,070 dpa 5) NLP Alternative with higher adjustments for jobs and market signals 1,150 dpa. The figures of the 2017 SHMA (adjusted for early years shortfall) and the DCLG Methodology are broadly similar and would suggest the net annual requirement for York is least 1,000 dwellings per annum based upon York’s own evidence and more likely 1,150 dpa in the DCLG and NLP work once economic growth is factored in.</p>	
13103	Obj	<p>Para 2.5 needs rewording to state 'at the start of the plan period' rather than 'by the end of the plan period'. The Plan Period needs clarity.</p>	<p>Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees</p>
13103	Obj	<p>Housing requirement needs to reflect the housing trajectory (Table 5.2) to recognise the housing shortfall since 2012. Concern that the Council has taken a political route in selecting the lowest possible housing number available. It is considered that a market signals uplift of 20% is warranted. Although the DCLG 2017 Housing Methodology consultation paper carries no weight, it suggests the net annual requirement is higher than the figure contained in the local plan. Concerns relating to the 5 year housing supply.</p>	<p>Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees</p>
13104	Obj	<p>Plan doesn't present the correct OAHN which flows from the evidence base and does not accord with guidance set out in NPPF and NPPG. The Council's delivery of sites fails to deliver the right housing in the right locations across the plan period to 2038 such that an appropriate green belt boundary can be established. Supportive of the housing requirement work undertaken by NLP in October 2017 (attached at Appendix 2 to rep).</p>	<p>Johnson Mowat on behalf of Redrow Homes and Linden Homes.</p>



Pre-Publication Draft Local Plan (2018) summary of consultation responses

13104	Obj	Para 2.5 needs rewording to state 'at the start of the plan period' rather than 'by the end of the plan period'. The Plan Period needs clarity.	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
13104	Obj	Housing requirement needs to reflect the housing trajectory (Table 5.2) to recognise the housing shortfall since 2012. Concern that the Council has taken a political route in selecting the lowest possible housing number available. It is considered that a market signals uplift of 20% is warranted. Although the DCLG 2017 Housing Methodology consultation paper carries no weight, it suggests the net annual requirement is higher than the figure contained in the local plan. Concerns relating to the 5 year housing supply.	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
13106	Obj	OAHN does not accord with NPPF/PPG; it does not incorporate the latest projects on household formation and jobs growth. The City's unmet housing need has not been addressed. We are mindful of housing requirement work undertaken by NLP and are supportive of its findings that conclude the housing requirement for the Plan period should be at least 1,150 dwellings per annum. further, housing requirement does not take account of identified affordable housing need. Concerned the Council has taken political route in selecting the lowest possible housing number available, contrary to the Framework, evidence and SA. Housing growth figure should also reflect the LEP's ambitions for growth. Given past delivery rates and affordability signals, PPG requires an upward adjustment to planned housing numbers (a market signals uplift). Rep suggests that given these signals an uplift of 20% is warranted.	Johnson Mowat obo landowner
13106	Obj	OAHN does not accord with NPPF/PPG; it does not incorporate the latest projects on household formation and jobs growth. The City's unmet housing need has not been addressed. We are mindful of housing requirement work undertaken by NLP and are supportive of its findings that conclude the housing requirement for the Plan period should be at least 1,150 dwellings per annum. further, housing requirement does not take account of identified affordable housing need. Concerned the Council has taken political route in selecting the lowest possible housing number available, contrary to the Framework, evidence and SA. Housing growth figure should also reflect the LEP's ambitions for growth. Given past delivery rates and affordability signals, PPG requires an upward adjustment to planned housing numbers (a market signals uplift). Rep suggests that given these signals an uplift of 20% is warranted.	Johnson Mowat obo landowner

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13182	Obj	<p>As part of the representor's submissions to the Preferred Options consultation its Client instructed the representor to undertake a Technical Review of the Council's SHMA and the SHMA addendum, which was prepared by GL Hearn in June 2016. This is included as an appendix to this representation. The technical review concluded that affordability has worsened sharply since 2013, compared to the 5 years preceding, which has led to greater affordability pressures than reported by the SHMA, requiring a greater than 'modest' upward adjustment to the 2014-based SNPP demographic based assessment of housing need&gt; It also concluded that no uplift for future jobs is recommended and the demographic and future jobs objectively assessed need is 920 dwellings per annum. When Market Signals Uplift is considered the full objectively assessed need is considered to range between 920 dwellings per annum and 1,070 dwellings per annum. The representor notes that the higher end of the representor's threshold directly aligns with the figure that is generated when utilising the DCLG standardised methodology. The Council has decided to progress with a housing target which is based solely on the baseline figure which is derived from the ONS 2014-based sub-national household projections and does not include the 10% uplift for market signals which is advised within the SHMA. By omitting the 10% uplift, and not progressing with a housing requirement of 953 dwellings per annum, the Council is failing to meet its full OAN, as required by the Framework and the Planning Practice Guidance (PPG) and the representor's client strongly objects to this approach, and the housing target outlined in Policy SS1 of the Plan. This is a fundamental issue to the entire Plan as the approach fails to meet the any of the tests of soundness set out in paragraph 182 of the Framework</p>	Barton Wilmore on Behalf of Barratt and David Wilson Homes
13182	Obj	<p>No evidence has been provided by Members to justify the removal of the 10% uplift and it is assumed that this has been viewed as a way of reducing the overall housing target. This is unacceptable and is not a sound and robust means of preparing a Local Plan. The DCLG proposed standardised methodology includes for an uplift for market signals over and above the baseline figure and in the specific case of York, would lead to a housing requirement of 1,070 dwellings per annum. Although the methodology is subject to consultation and therefore carries limited weight, it provides an indication as to how the Government considered housing requirements should be calculated, and the consideration of market signals is a key issue. In order to make the plan sound, the housing figure should be adjusted upwards to consider market signals. This is turn will require additional sites to be allocated for residential development.</p>	Barton Wilmore on Behalf of Barratt and David Wilson Homes

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13193	obj	Current 867 dpa OAHN figure significantly underestimates annual housing number. The inclusion of 10% market signals uplift is necessary and failure to add it has no justified empirical analysis underlying it. Also consider that it is unreasonable to rely on windfalls and therefore the windfall allowance should be removed and added to the requirement to identify sites. Consider that splitting shortfall across plan period should be changed to across the first five years of plan period. There is an over reliance on strategic sites which will not deliver until later in the plan period. Support minimum target of 1234 dpa which incorporates markets signals adjustment (86), windfalls (169) and shortfall (112). Also support for more sites included in the short term to meet need.	
13193	obj	Current 867 dpa OAHN figure significantly underestimates annual housing number. The inclusion of 10% market signals uplift is necessary and failure to add it has no justified empirical analysis underlying it. Also consider that it is unreasonable to rely on windfalls and therefore the windfall allowance should be removed and added to the requirement to identify sites. Consider that splitting shortfall across plan period should be changed to across the first five years of plan period. Support minimum target of 1234 dpa which incorporates markets signals adjustment (86), windfalls (169) and shortfall (112).	
13405	Obj	The Council's Plan doesn't meet York's housing need. Govt figures suggest that York will need to build at least 1070 homes a year to meet growing demand. However, the Tories and Lib Dems refuse to allocate enough houses and don't plan to build any social housing at all. Not enough housing means higher house prices and rents. The Council Plan doesn't include enough affordable housing. The Tory / Lib Dem Plan will mean fewer affordable homes for local people. For every 5 homes that York needs, the Council only plans to build 4. The Plan has 3300 fewer homes than needed.	
13408	obj	Council should update the plan to reflect the Government's proposed standardised methodology and support the figure of 1070 dpa as a housing target. Consider that further sites will need to be identified as a result of this.	
13410	Obj	Concerned to see that prospective sites are included in the housing figures, including those that won't be available for years - if at all.	
13525	Obj	The consultation has not given sufficient attention to the overall housing numbers required for York. Under national policy the council is obliged to deliver the correct number of houses.	
13539	Obj	Council not provided a trajectory for the housing allocations so it is difficult to analyse the likely delivery rates of the individual sites. However, based on limited information, appears that the Plan underestimates length of time it will take housing allocations to start delivering completions.	Carter Jonas on behalf of Picton Capital Ltd

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13560	Obj	Disappointed that the Council is ignoring the evidence based advise on how many homes are needed in York. There are many homes that are overcrowded and consequently people living in poor conditions or people moving away from York due to the lack of Council Housing. The homeless community in York is growing and will continue to grow whilst the Council ignores this situation. Allowing only private rental or university/student lets to take over will leave York residents without homes. The lack of clarity on this and that the Council are ignoring their own reports that have been commissioned is disgusting. Please rethink.	
13595	Obj	By omitting the 10% uplift, and not progressing with a housing requirement of 953 dwellings per annum, the Council are failing to meet government guidance.	PB Planning on behalf of Mr K Chan
13653	Obj	Major concerns that the local plan doesn't set out proposed spatial strategy, the OAHN does not accord with national guidance, no housing trajectory or detailed assessment of the 5-year supply has been produced. Supply is overly reliant on windfalls. The selection and de-selection of sites based upon landscape quality is not proven.	Johnson Mowat on behalf of Yorvik Homes
13653	Obj	Para 2.5 needs rewording to state 'at the start of the plan period' rather than 'by the end of the plan period'. The Plan Period needs clarity.	Johnson Mowat on behalf of Yorvik Homes
13653	Obj	Housing requirement needs to reflect the housing trajectory (Table 5.2) to recognise the housing shortfall since 2012. Concern that the Council has taken a political route in selecting the lowest possible housing number available. It is considered that a market signals uplift of 20% is warranted. Although the DCLG 2017 Housing Methodology consultation paper carries no weight, it suggests the net annual requirement is higher than the figure contained in the local plan. Concerns relating to the 5 year housing supply.	Johnson Mowat on behalf of Yorvik Homes

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13030i	Obj	<p><u>Appendix 3</u>: The representor is significantly concerned with the Draft Plan’s disregarding of the evidence set out in the SHMA Update. In publishing the Draft Plan, the Council has taken the decision to disagree with its own evidence base document, preferring to revert to a position which only recognises the scale of housing growth represented by the ‘starting point’ of the 2014-based sub-national household projections (SNHP). The Draft Plan therefore expressly advances a variant OAN of only 867 dwellings per annum. This position cannot be viewed as sound. The Council has presented no evidence to justify deviation from the OAN most recently identified in its own evidence base, nor the reasons for preferring its alternative figure. On 14 September, the Government published its consultation proposals ‘Planning for the right homes in the right places’. This incorporates a new methodological approach for calculating housing needs, with the Government publishing an indicative OAN for each authority in England. Under the standardised method proposed, the indicative figures published by DCLG indicate that York should as a minimum plan to meet a need for 1,070 dwellings per annum over the next decade (2016 – 2026).</p>	Turley representing Gallagher Estates
13030i	Obj	<p><u>Appendix 3</u> continued: It is recognised that the methodology is only published for consultation, and there is no certainty that it will continue to be advanced in its current form or in an adapted form. It is apparent that the DCLG’s indicative OAN exceeds that concluded in the Council’s evidence base to a relatively modest degree and the alternative figure selected by the Council to a much greater extent. Under the DCLG’s proposals, the Council would be required – in the absence of an up-to-date Local Plan – to plan on the basis of the standardised methodology from 1 April 2018. The Council’s decision to accelerate its plan-making process represents a clear response to this timetable, with the plan to seek to ensure that the submitted Plan is tested against the current guidance.</p>	Turley representing Gallagher Estates

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13030i	Obj	<p>Appendix 3 continued: It is of note that the DCLG proposals are clear to introduce the standardised OAN as a <i>'minimum'</i> position of housing need. Indeed, the consultation documents confirm the expectation that authorities will use the standardised method to establish a minimum level of need, although it is proposed that: <i>"Plan makers may put forward proposals that lead to a local housing need above that given by our proposed approach. This could be as a result of a strategic infrastructure project, or through increased employment (and hence housing) ambition as a result of a Local Economic Partnership investment strategy, a bespoke housing deal with Government or through delivering the modern Industrial Strategy.'</i> This forms an important context in considering the scale of the economic ambition of the Council and its partners within the wider economic geography within which York operates. A failure to plan positively for new housing in the context of a realisation of the economic growth objectives of the city will place increasing pressure on the housing market, having implications for the affordability of housing and leading to unsustainable commuting patterns.</p>	Turley representing Gallagher Estates
13030i	Obj	<p>Appendix 3 continued: The Council's decision to simply disregard the justification for any market signals adjustment is clearly at odds with national guidance and its own evidence base and simply ignores the evidence of the symptoms of worsening affordability in the latest data. The Council's proposition that no additional need is required to be provided for above the <i>'starting point'</i> projection effectively serves to dismiss the implications of this historic failure to provide the homes that were needed. This fails the test of reasonableness and is clearly not justified. The implied reduction in the need must therefore be viewed as unsound.</p>	Turley representing Gallagher Estates
13030i	Obj	<p><u>Appendix 3:</u> The SHMA Update as published is prefaced by a note drafted by the Council to provide an <i>'introduction and context to [the] objective assessment of need'</i>. This acknowledges that the PPG describes <i>'official projections...as a baseline only'</i>, but proceeds to <i>"accept"</i> only this figure. It is stated that: <i>'Executive also resolved that the recommendation prepared by GL Hearn in the draft Strategic Housing Market Assessment, to apply a further 10% to the above figure [867] for market signals (to 953 dwellings), is not accepted on the basis that Hearn's conclusions were speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental considerations.'</i> This demonstrates that the Council has dismissed the adjustment applied by its consultants and selected a figure derived from a partial application of the PPG methodology. The inference that <i>'environmental considerations'</i> should moderate the Council's OAN evidently strays into the process of establishing a housing requirement, and is wholly irrelevant in objectively assessing needs.</p>	Turley representing Gallagher Estates

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13030i	Obj	<p><u>Appendix 3</u> continued: This is clearly confirmed in legal judgments, which have highlighted that the NPPF requires a two stage process whereby the OAN is first identified before justification is provided as to whether or not this can be accommodated in the establishment of the housing requirement. The approach taken by the Council is therefore unsound even outside of any consideration as to the technical components of the OAN calculation. The Representor notes the adjustment in isolation indicates a higher level of need than advanced through the Draft Plan (867dpa). This suggests that the Draft Plan fails to provide even for a basic level of demographic housing need. It is considered that whilst the SHMA evidence confirms that the forecast levels of employment growth can be supported by the OAN, the Council should provide a greater level of clarity as to the justification for its selection of a comparatively low employment target against the backdrop of an apparently more ambitious economic strategy. In the representor's technical report, we raised concerns around the lack of transparency in the assumptions applied in assessing the balance between job growth and labour-force growth in the demographic projections. The response to this issue provided in Appendix A to the SHMA Update is not considered to</p>	Turley representing Gallagher Estates
13090i	obj	<p>The Council are failing to meet their full OAHN as set out in the evidence base (953 dpa which incorporates a 10% uplift for market signals) and is therefore not sound when considered against the NPPF. No evidence has been provided to justify the removal of 10% uplift and it is assumed that this has been a way to reduce housing numbers. This is not a sound or robust approach. Previous OAHN assessment submitted by Barton Willmore (2016) supported a higher figure of between 920 - 1070 dwellings per annum.</p>	PBPlanning on behalf of TW Fields
13090i	obj	<p>The Council are failing to meet their full OAHN as set out in the evidence base (953 dpa which incorporates a 10% uplift for market signals) and is therefore not sound when considered against the NPPF. No evidence has been provided to justify the removal of 10% uplift and it is assumed that this has been a way to reduce housing numbers. This is not a sound or robust approach. Previous OAHN assessment submitted by Barton Willmore (2016) supported a higher figure of between 920 - 1070 dwellings per annum.</p>	PBPlanning on behalf of TW Fields
13411i	Obj	<p>Has CYC undertaken a study of the economic and other benefits of the best and most versatile agricultural land within the district? Notes NPPF para 112 "<i>Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality</i>". The analysis undertaken in the 2014 SHLAA sows no adequately address this matter. Many of the draft sites perform poorly for sustainability and use Greenfield (draft Green Belt) land where the agricultural value has not been ranked.</p>	Thomas Pilcher Homes Ltd

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13411v	Obj	<p>It is of a great concern to all stakeholders of the York Local Plan that it should be considered sound. It is crucial the Plan is positively prepared to meet the objectively assessed need and infrastructure requirements. Currently the Plan is inadequate for the number of dwellings needed during the Plan period, it does not account for market signals or comply with national methodology. Deliverability is also a concern - the Plan relies too heavily on a few large new settlements which would have a long time frame for delivery and are less sustainable than many smaller sites. It is safe to say the current draft plan would not be effective as described in Para 182 of the NPPF. There is uncertainty about the availability of the MOD land within the Plan period and also infrastructure requirements for sites ST14, ST15 and ST5. The undersupply of housing should be dealt with early in the Plan - it should also find a greater number of small and medium sized deliverable sites to help the 5-year supply.(e.g. Site 191)</p>	Pilcher Homes
13411v	Obj	<p>It is of a great concern to all stakeholders of the York Local Plan that it should be considered sound. It is crucial the Plan is positively prepared to meet the objectively assessed need and infrastructure requirements. Currently the Plan is inadequate for the number of dwellings needed during the Plan period, it does not account for market signals or comply with national methodology. Deliverability is also a concern - the Plan relies too heavily on a few large new settlements which would have a long time frame for delivery and are less sustainable than many smaller sites. It is safe to say the current draft plan would not be effective as described in Para 182 of the NPPF. There is uncertainty about the availability of the MOD land within the Plan period and also infrastructure requirements for sites ST14, ST15 and ST5. The undersupply of housing should be dealt with early in the Plan - it should also find a greater number of small and medium sized deliverable sites to help the 5-year supply.(e.g. Site 191)</p>	Pilcher Homes
13411v	Obj	<p>It is clear any Plan that does not take account of market signals figure of 953 (as recommended by GL Hearn) is certain to be refused sign off from the Secretary of State. Furthermore, the standardised oAHN figure is rumoured to be 1070 dwellings pa. It is vital CYC is capable of delivering the larger of either figure if the Plan is to be approved. NLP reached a range of 1125 min to 1255 (inc. affordable housing need) and Regeneris concluded 1020 dpa but up to 1320 to meet affordable need. Failure to produce a Local Plan would result in Whitehall taking control of the process. The Executive need to be informed of the seriousness of their recent actions.</p>	Pilcher Homes



Pre-Publication Draft Local Plan (2018) summary of consultation responses

13411v	Obj	It is clear any Plan that does not take account of market signals figure of 953 (as recommended by GL Hearn) is certain to be refused sign off from the Secretary of State. Furthermore, the standardised oAHN figure is rumoured to be 1070 dwellings pa. It is vital CYC is capable of delivering the larger of either figure if the Plan is to be approved. NLP reached a range of 1125 min to 1255 (inc. affordable housing need) and Regeneris concluded 1020 dpa but up to 1320 to meet affordable need. Failure to produce a Local Plan would result in Whitehall taking control of the process. The Executive need to be informed of the seriousness of their recent actions.	Pilcher Homes
NDM2	Obj	Nearly 15,000 houses equates to around 37,500 residents - far, far too many.	
77	Supp	Support the figure of 867 dwellings per annum. The most recent DCLG figure in September 2017 of 1070 dwellings for York is perverse, in view of the likely effects of Brexit, which may result in a reduction in inward migration and a reduced housing need. If the latest figure suggested DCLG figure of 1070 per annum is implemented, it would lead to excessive strain on the City's infrastructure. There is also doubt about whether the local building industry could cope with that level of building.	Strensall With Towthorpe Parish Council
1355	Supp	Has raised concerns in previous Local Plan submissions about the scale of development and the impact on village communities around York. Is pleased that the Council reassessed housing numbers to bring them under control and in appreciation of the local infrastructure and transport network. The current housing allocation of 867 per annum is a far more sustainable number. The Council's work bringing this number down shows that it is listening to the concerns that have been raised over several consultation periods.	Julian Sturdy MP
2416	Supp	It is appropriate that 'garden villages' which had its origins in the work of Unwin and Parker at New Earswick and more recently translated at Derwenthorpe, should be advocated as part of the solution to the city's housing need.	
2846	Supp	Support the figure of 867 dwellings per annum. The most recent DCLG figure in September 2017 of 1070 dwellings for York is perverse, in view of the likely effects of Brexit, which may result in a reduction in inward migration and a reduced housing need. If the latest figure suggested DCLG figure of 1070 per annum is implemented, it would lead to excessive strain on the City's infrastructure. There is also doubt about whether the local building industry could cope with that level of building.	
5167	Supp	Support for the allocation of major strategic sites to deliver substantial numbers of new housing in sustainable locations across York. Specifically support the regeneration of accessibly located brownfield land sites within the urban area for the delivery of housing.	Lichfields on behalf of Hungate (York) Regeneration Ltd

Pre-Publication Draft Local Plan (2018) summary of consultation responses

5671	Supp	Supports the protection of the rural setting of York, the unique historic character of the City and its surrounding rural areas and the preservation of high quality agricultural land. It is therefore pleasing to see house numbers have been substantially reduced, more brownfield sites are being used and consequently a lesser removal of Green Belt land.	
13030	Supp	<u>Appendix 3 Continued:</u> The representor acknowledges that the most recently published SHMA Update has taken into consideration a number of the points raised through this review. Indeed, it is considered helpful that Appendix A to the SHMA Update includes a summary of the points raised by the representor and other parties with regards to the OAN and the action taken to respond. The approach taken in the SHMA Addendum to consider more fully the 2014-based SNPP is welcomed and responds to the previously raised concern. The representor agrees as the SHMA identifies that the latest demographic evidence confirms ‘very strong trends’ in population growth which would mean that any suggestion of a lower level of growth which ignores these more recent trends would ‘ <i>not be defensible.</i> ’ It is also agreed that it is appropriate and necessary to take into account evidence of the historic suppression of younger household formation, with this primarily linked to worsening affordability over recent years. The 2017 SHMA proposes a more pronounced adjustment to respond to market signals. A 10% adjustment is deemed as being required and reasonable to account for evidence of worsening market signals. A more pronounced uplift is welcomed and responds positively to the points of critique raised previously.	Turley representing Gallagher Estates
13204	Supp	The provision proposed in the York Plan (without the market signal adjustment) will still allow the collective LCR housing growth range to be achieved. On that basis the Local Plan will contribute to the SEP housing delivery ambitions.	Leeds City Region Local Enterprise Partnership
13319	Supp	Supports building more houses	
13584	Supp	The provision proposed in the York Plan (without the market signal adjustment) will still allow the collective LCR housing growth range to be achieved. On that basis the Local Plan will contribute to the SEP housing delivery ambitions.	West Yorkshire Combined Authority

General Growth in York (Vision)			
187	Comm	The analysis presented in the Background and Vision Chapter is confusing and contradictory. For example, Para. 1.24 states the city is in good shape, but Para.1.31 then highlights that the City's ranking on the Index of Multiple Deprivation indicates that as a whole it has become more deprived.	York and North Yorkshire Chamber of Commerce
238	Comm	Re spatial portrait/vision - support for the general summary of the City's many heritage assets and the general contribution that York's historic environment makes to the City. Note suggested change at para 1.49 to identify 'safeguarding the special character and setting of the history city' as being the 'primary' purpose of York's green belt, using terminology from NPPF and daved RSS. Notes that the vision itself is not particularly place specific, nor does it articulate the special qualities and distinctiveness of the historic city. Suggested alternative text: "York aspires to be a City whose special qualities and distinctiveness are recognised worldwide, where its unique legacy of historic assets are preserved and enhanced, and where the full potential that its historic buildings, spaces and archaeology can contribute to the economic and social welfare of the community is realised. The Local Plan...etc". Given that york's historic environment plays such a key role in the economic well-being of the City, the quality of life enjoyed by its communities and in placemaking, that the Vision and approach to managing the City's heritage assets should place Heritage at the forefront of the plan (ref para 2.8-2.11, to be moved to below the vision box, and renamed 'Conserving and enhancing the environment' to reflect NPPF). Sub-heading para 2.8 amend to 'The historic environment'.	Historic England

Pre-Publication Draft Local Plan (2018) summary of consultation responses

386	Comm	<p>General comments stress the importance of getting a plan in place, protecting local green space as well as the green belt and so on but wish the plan was more ambitious in terms of sustainable public transport infrastructure and had strategic action behind it as opposed to the current laudable but ultimately aspirational objectives. Specifically mentions the prospect of a light rail system (funded through planning gain and regional infrastructure funding) as many strategic sites admit congestion is a major problem but only offer very limited solutions. Generally support the plan but disagree with the higher housing target as it is pushing at and beyond the boundaries of what the city's infrastructure can sustain, particularly in terms of transport and air quality, but drainage and biodiversity too. Stress the importance of providing affordable housing given our past under-delivery, the council should be funding some affordable housing directly. Furthermore, for affordable housing to be truly accessible it must be combined with sustainable, affordable public transport. Remain sceptical that a high housing target will make any difference to the actual delivery of affordable housing. Feel that the plan should consider a more equitable distribution of new housing across the city. To create sustainable developments which respect York's environment, provide warm affordable homes and are resilient against a future of rising energy prices and diminishing resources the Plan must also include an active and clear commitment to the environmental sustainability embodied in the One Planet York principles, including zero carbon building and the development of local renewable energy networks. All development principles and site allocations should be measured against this using an improved version of the decision making tool currently being trialled for major policy decisions. Points regarding the written style of the plan: 1) Throughout the document statements of intent need to be clearer and more definite, without so many qualifying clauses. 2) There is lack of consistency between the treatment of the various strategic sites in the document. There is a great deal of detail in the policy principles for some relatively small sites, whilst some far larger sites are very short on detail. Principles that apply to one site, for example requirements for very high levels of sustainable building, should be applied to all sites, unless there is an exceptionally good reason why they wouldn't be applicable. 3) Not at all clear why for some sites make reference to the provision of affordable housing in keeping with the affordable housing policy and some don't. Surely they should all say this?</p>	York Green Party
456	Comm	<p>Term 'garden village' is meaningless - just a way to make suburban sprawl sound more appealing. Only one of the proposed sites is sufficient in scale to be sustainable.</p>	
456	Comm	<p>Providing recreational facilities does little to promote healthy lifestyles when surrounding streets are traffic clogged and polluted. Requires more holistic approach.</p>	
456	Comm	<p>The proposals for the Green Belt do not currently direct development to the most sustainable locations.</p>	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

9888	Comm	Does not set out adequate spatial strategy. OAHN does not accord with national guidance. Council has not produced trajectory or detailed assessment of 5-year supply. Council's selection and de-selection based on landscape quality is not proven. The city's unmet housing need has not been addressed. Support housing work undertaken by NLP and conclude that housing requirement per annum should be at least 1,150.	Johnson Mowat on behalf of KCS Development Ltd
10121	Comm	Does not set out adequate spatial strategy. OAHN does not accord with national guidance. Council has not produced trajectory or detailed assessment of 5-year supply. Council's selection and de-selection based on landscape quality is not proven. The city's unmet housing need has not been addressed. Support housing work undertaken by NLP and conclude that housing requirement per annum should be at least 1,150.	Johnson Mowat on behalf of Vernon and Co.
12389	comm	Unmet housing need in York exacerbates affordability issues and puts pressure on neighbouring authorities to meet need. The plan is reliant on several large strategic sites to deliver very significant dwelling numbers and will require significant infrastructure.	
12656	comm	Concerns over spatial approach reliant on the creation of new villages; consider that urban extensions of existing villages is preferable.	Pegasus on behalf of Lovel Developments Ltd.
13030	Comm	<u>Appendix 3</u> : The representor notes that the Council continues to take a cautious approach to the scale of job growth which will be achieved over the plan period, but this is immediately followed by a statement of ' <i>ambition</i> '	
13106	Comm	It is unclear which jobs growth forecast has been used, and how this relates to the Leeds City Region work and the Northern Powerhouse.	Johnson Mowat obo landowner
13473	Comm	Suggests that the plan's vision may not be in the interests of ordinary hard working families, with particular reference to the lack of social/affordable housing.	
13637	Comm	Support the detailed vision for the Local Plan which is in accordance with the NPPF. The unique approach taken by CYC in setting out its individual development principles is welcomed reflecting the NPPFs requirement for Councils to produce a locally distinctive Plan and allows the reader to clearly understand what CYC is hoping to achieve in order to deliver the vision.	CPRE - North Yorkshire
13639	Comm	Plan should focus more on addressing and discussing key planning, community and development issues. Should generally focus more on social issues and move planning policy / aspirations to an appendix.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

145	Obj	Local Plan states that it looks to provide sufficient land to accommodate an annual provision of around 650 new jobs. It is important to ensure an appropriate balance between employment and housing. As noted in previous comments to the plan, neither the 2016 SHMA, nor its addendum have considered the implications of the LEP ambitions for growth. This should be factored into the housing need assessment (whether using the Council's methodology or the DCLG standard methodology) to ensure that there is an appropriate balance between employment growth aspirations and homes.	Home Builders Federation
536	Obj	There is a total lack of evidence provided within the Local Plan & the supporting evidence base on specific site phasing, lead in times & delivery rates. As currently drafted the Local Plan approach to housing supply is considered to be unjustified due to the lack of evidence and inconsistent with paragraph 47 of the NPPF. The Plan's Spatial Strategy relies on the delivery of large strategic sites to provide the majority of the housing requirement - however, they often have complex masterplanning issues which will affect lead in times (Rep includes national research on lead in times across the country). The Plan has 10 strategic sites which, according to national research, would not deliver until later in the plan period - this should be indicated in the housing trajectory. Additional smaller sites should add flexibility. Also, lack of info on how densities calculated.	Lichfields obo Keyland Developments
544	Obj	Not clear of the position in relation to the Council's 'City Vision 2030' and the local plan's vision. The background section adds to the lack of clarity, specifically in relation to the RSS, One Planet York, York Economic Strategy plus numerous references to other plans and programmes with no explanation to their relevance.	
1675	obj	The plan does not evidence or justify its decision-making for the spatial strategy of site allocations. The plan does not deliver sites in the right location across the plan period to 2038 such that an appropriate Greenbelt Boundary can be established. On this basis it is not possible to consider the suitability of the revised portfolio of sites.	Johnson Mowat on behalf of Taylor Wimpey
1741	Obj	York has the opportunity to build upon an already diverse economy and positively encourage new employers by having a good range of deliverable new employment sites supporting economic vitality and new jobs. We consider the Plans message is one of constraint rather than growth. On the whole we consider there to be a need to deliver more land for employment rather than less to help the aspirations of the city for a shift towards a higher value economy. We have seen in recent years a loss of employment use to housing through office to residential conversions through permitted development rights and know on effects to adjoining employment sites. There have also been delays in delivery of new employment floor space at regeneration sites.	Carter Jonas on behalf of client

Pre-Publication Draft Local Plan (2018) summary of consultation responses

6663	Obj	<p>Objects to the lack of safeguarded land policy and allocations. Rather than allocating safeguarded land the Council are proposing to rely on the continued delivery of a limited number of large allocations beyond the Plan period, believing that this approach will ensure that the green belt boundaries will not need to be altered at the end of the Plan period. We disagree with the Council's stance on this matter, which conflicts with recent Counsel advice regarding advice on the approach contained in the Local Plan. Counsel notes that the most important point is the ability to demonstrate that the Green Belt boundary will not be affected. Counsel also notes that the Council need to provide sufficient land to ensure that the Green Belt remains unaltered well beyond the plan period - this is usually done in the form of safeguarded land but it does not exclude the approach adopted in the Local Plan. The Local Plan has not identified a sufficient supply of sites to meet the future development needs of the District. An insufficient supply of sites to meet the City's development needs and the complete absence of any safeguarded land policy and safeguarded land allocations will mean that there would be nowhere else within the district where the City's development needs could be met. This would be exacerbated if the delivery from some of the allocated sites were delayed by the planning process or not brought forward at all. Plan should allow for a safety net of safeguarded land to ensure that the green belt does not need to be amended at an early stage. NPPF requires local planning authorities to maintain a 5-year housing land supply. The Plan does not provide sufficient sites to deliver this, meaning that the Council would have to undertake a review of the Plan to identify additional sites before the end date of the Plan. If there us no 5-year housing supply there will be significant pressure to amend the greenbelt in 2032 or earlier.</p>	DPP obo Linden Homes Strategic Land
10931	Obj	<p>Disappointed by lack of vision - a collection of sites that are required to meet minimum standards for environmental protection, sustainability, transport requirements, green spaces, energy efficiency and social housing. Mentions the urgency of climate change, as such would like to houses built to highest environmental standards, community gardens, a car free city centre, cycling infrastructure, air quality etc. Would like to see more communities actively involved in running of their local areas. Should be able to walk / cycle the length of the river on either side, need more ambitious plans for riverside development.</p>	
12160	obj	<p>Consider that it would be better to add development to existing villages rather create a new garden village.</p>	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13102	Obj	Page 16 Para 2.5 informs that 'By the end of the plan period sufficient sites will have been identified for viable and deliverable house sites ...'. This needs rewording to inform these sites are to be identified now, at the start of the plan period. This para also needs to be clear over the plan period, that being up to 31 March 2038. The quantum of housing referenced in this para at 867 dwellings per annum is also at odds with that referenced in Trajectory Table 5.2 which seeks to make good the early years (2012 to 2017) shortfall and adds back a further 56 dwellings per annum up to 31 March 2033. As such, the requirement for 1st April 2017 to 31st March 2033 is 923 per annum. For the avoidance of doubt, we don't accept that figure but if the Council are to continue with 867, it should at least be referenced correctly.	Johnson Mowat on behalf of KCS Development
13102	Obj	Paras 1.34 and 4.2 both make reference to the jobs growth forecast although para 4.2 makes reference to an additional forecast from Experian. It is now unclear as to which forecast has been used and how these relate to the Leeds City Region work and Northern Powerhouse.	Johnson Mowat on behalf of KCS Development
13106	Obj	Spatial Strategy - the Plan does not adequately set out a proposed spatial strategy and framework for the future development of the City of York. The document contains no narrative as to how or why the council has arrived at its suggested approach, nor does it set out the implications of this pattern of spatial distribution or discuss the alternative options considered.	Johnson Mowat obo landowner
13461	Obj	Says there does not need to be any more building in York, not for housing, businesses, roads or anything else as enough land has been taken by the universities. Land is for growing food and rearing livestock, university sports fields should be returned to agriculture. York is no longer a historic city, just student housing office buildings and car parks.	
13513	Obj	Pleased that sustainability is supposed to underpin the plan but feels the plan should be far more ambitious, not just making the city "fit for the future" but a city that sets new standards other aspire to emulate. Should be doing far more to promote active travel, mentions removing the Castle Car Park and replacing with a city centre cycle park. The university is going to expand again, as is the city as a whole, there should be a 24 hour rail service. Car parking should only be available to those with mobility issues.	
13550	Obj	Paragraph's 1.35-1.44 of Reg 18 Local Plan. The projections for employment growth in Para 1.35 are presented as though the growing job market and the local economy is a good thing. Queries whether this is compatible with a sustainable future. Growth in employment will lead to increasing population and additional carbon emissions, stress on the existing infrastructure and a more crowded city. The city's roads are already at breaking point. Most job growth will be from tourism and the two universities. This would be to the detriment of the general population. The character of York is being diminished. The council should think about rebalancing the economy.	



Pre-Publication Draft Local Plan (2018) summary of consultation responses

13620	Obj	York is a pleasant place to live but the overall plan lacks ambition, should be looking to radically improve quality of life - make York the greenest city in the UK, with longest-lived, healthiest inhabitants, richest habitats for wildlife and best-preserved heritage. Housing stock should be of highest sustainability standards, well insulated and heated / powered by renewables. Development should be confined to brownfield sites in order to protect wildlife, mixed developments with good quality affordable housing allows communities to thrive. Concerned about the threats to Strensall Common and habitats in Elvington for golden plover and lapwings. Transport in York needs to be radically re-thought, major investment needed in foot and cycle ways. Restrictions on parking both in the city centre and residentially could improve air quality, public transport is a better alternative but should be electric not diesel, small electric vehicles (seating up to six people, as works in the narrow streets of Rome that are similar to York) could be provided for people unable to walk or cycle. Stresses the need for quality modern design, resents poorly designed 1960s buildings.	
11	Supp	The ambition that the city's special qualities and distinctiveness should have global recognition is supported.	North Yorkshire County Council
12656	supp	Support the vision of the Local Plan. Support that the plan seeks to plan for a vibrant city which enhance the vitality of local communities through meeting housing economic development whilst enhancing the city's unique historic, cultural and natural environmental assets.	Pegasus on behalf of Lovel Developments Ltd.
13026	supp	Support Council's approach that strategic sites contribute to delivering the long-term Green Belt permanence.	
13408	supp	Support the vision of the Local Plan. Support that the plan seeks to result in communities that are well connected, well served, environmentally sensitive and considerate of the local environment.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

Housing site capacity			
13030	Comm	The question of deliverability is a critical one for York, particularly in being reliant on a small number of very large sites to meet its housing requirement. For example, site ST15 is proposed to deliver 2,200 dwellings over the plan period. At this stage, no evidence is presented which outlines when this site might be expected to come forward and how it will deliver an average of 130 residential dwellings per annum over the entire plan period.	Turley representing Gallagher Estates
13093	comm	There is no certainty over the delivery rates that can be achieved on some of the strategic sites allocated to how associated yields will address the requirement.	O'Neill Associates on behalf of Jorvik Homes
13099	comm	There is no certainty over the delivery rates that can be achieved on some of the strategic sites allocated to how associated yields will address the requirement.	O'Neills Associates on behalf of Galtrees Garden Village Development Company
1741	Obj	CYC has not provided a housing trajectory for housing allocations and therefore it is difficult to provide a detailed analysis of the likely delivery rates of individual sites. Based on the limited information provided we consider that the proposal significantly under estimates the length of time it will take for allocations to deliver completions. The majority of sites are large strategic allocations likely to take a number of years to go through the planning process. Many sites are under multiple ownership and land assembly will take considerable time. In the early years of the Plan a large number of sites will not deliver housing and given the need for a realistic OAN this will result in a delivery shortfall. Concern is raised with the capacity calculation for sites and fear that proposed allocations have been over estimated.	Carter Jonas on behalf of client

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13030	Obj	<p>At this stage, the Council has presented no evidence that these larger sites [ST7, ST8, ST9, ST14 and ST15] are deliverable at the rate suggested. This is a particular issue for very large sites given the extent new infrastructure needed to unlock them. Such sites must be subject to further deliverability testing and until such time, they cannot be relied upon to deliver the Local Plan. The proposed reliance on the larger sites is not sufficiently justified and the Local Plan is therefore unsound. It is important that the Local Plan includes an appropriate allowance for flexibility. Whilst the Framework does not prescribe a 'Flexibility Factor' with respect to housing allocations, a recent Report to the Communities Secretary and the Minister of Housing and Planning (March 2016) prepared by the Local Plans Expert Group recommends that Local Plans should include a mechanism for the release of developable 'Reserve Sites' equivalent to 20% of their total housing requirement to enable a Plan to respond to rapid change. A flexibility allowance of at least 20% should be pursued to ensure that the full objectively assessed need for housing is met.</p>	<p>Turley representing Gallagher Estates</p>
-------	-----	--	--

Open Space/Green Infrastructure			
386	Comm	<p>Would like to support Cllr Hayes submission saying that the area of land adjacent to the city walls near Walmgate Bar identified as 'amenity green space' should be extended to include the open space between the fenced garden of the former Willow House Older Persons Home and frontage onto Walmgate. Would also add that all of the green space that surrounds CYC housing blocks both sides of Walmgate, from George Street down to the river Foss should be counted as 'amenity green space', joined up with the area designated alongside the city walls. Cllr Craghill was elected in May 2015 and does not remember being asked to check over or make submissions to the Guildhall ward map for green space but may have missed this.</p>	York Green Party

Pre-Publication Draft Local Plan (2018) summary of consultation responses

<b>Green Belt (non site specific)</b>			
71	Comm	Green Belt. Where is the measurement of 6 miles from the city centre measured from? The Green Belt boundary in many cases is not 6 miles from the city centre.	Nether Poppleton Parish Council
71	Comm	Para 3.15 states that Green Belt boundaries should be defined using definable features on the ground. What happens where features such as hedgerows and trees are removed?	Nether Poppleton Parish Council
71	Comm	Green Belt. Where is the measurement of 6 miles from the city centre measured from? The Green Belt boundary in many cases is not 6 miles from the city centre.	Poppleton Neighbourhood Plan Committee
71	Comm	Para 3.15 states that Green Belt boundaries should be defined using definable features on the ground. What happens where features such as hedgerows and trees are removed?	Poppleton Neighbourhood Plan Committee
78	Comm	Green Belt. Where is the measurement of 6 miles from the city centre measured from? The Green Belt boundary in many cases is not 6 miles from the city centre.	Upper Poppleton Parish Council
78	Comm	Para 3.15 states that Green Belt boundaries should be defined using definable features on the ground. What happens where features such as hedgerows and trees are removed?	Upper Poppleton Parish Council
80	Comm	Important to build on Brownfield sites before encroaching on areas recognised as Green Belt.	Wigginton Parish Council
220	comm	There has been no Green Belt Review undertaken during the Local Plan process which would be a useful tool to inform the strength of the Green Belt Boundary.	
536	Comm	Whilst the need for Green Belt release in appropriate locations in order to meet the housing requirement is not disputed, this should only be done following a review of all other non-green belt options.	Lichfields obo Keyland Developments
1355	Comm	Whilst it is appreciated that there are not enough brownfield sites to satisfy York's future housing need, this should not mean running roughshod over village communities and unnecessarily concreting over swathes of Green Belt land.	Julian Sturdy MP
1668	comm	Recent examples in approved Development Plans of what constitutes "well beyond the plan period" in relation to greenbelt permanence. Can equate to additional 10% of land allocations, an additional 5 years worth of land or in some cases 10 years worth of land.	PBPLanning on behalf of Barratt and David Wilson Homes

Pre-Publication Draft Local Plan (2018) summary of consultation responses

4159	Comm	Greenbelts are absolutely necessary for protecting the rural countryside and character and setting of our cities and prevent sprawl. NPPF is very clear on the need for sustainable development, this revised Plan is profoundly unsustainable. To add tens of thousands of homes would add massive amounts of cars to the roads. Cycle should make more use of brownfield sites. York's green belt is clearly under threat and I remain deeply concerned CYC is using localism to ignore aspects of the NPPF. Protection of the greenbelt is essential to protecting the character and setting of our historic city.	
6341	Comm	Previously we have passed comment on the absence of safeguarded land in the Sept 2016 Consultation. The tight inner and inset green belt boundaries now proposed are unjustified in relation to the latest OAN and increased housing needs derived from the recently published national methodology. There is no flexibility within the draft plan for contingencies from allocated housing sites. Draft Policy DP1 proposes an outer boundary for the Green Belt 6 miles from the city centre. No justification is provided for extending the green belt - Accordingly the outer boundary should be re-drawn. The Plan is neither justified nor consistent with national policy in respect of green belt policy.	
9254	comm	Consider that exceptional circumstances exist and that a general review of the green belt is necessary. The Green Belt boundary has materially frustrated York's expansion and successful adoption of a new local plan.	How Planning on behalf of Barwood Strategic Land LLP
9381	comm	To ensure that a green belt is permanent local planning authorities allocate safeguarded land to strike a balance between an enduring green belt and future growth. A plan that includes for this is sound and justified. 10 year post plan period is often recommend to set an enduring Green belt.	DPP Planning on behalf of Linden Homes
9883	Comm	In the absence of an adopted Local Plan, some considerable confusion surrounds the status of the Green Belt. Much of the commentary relating to the Green Belt speaks from a position that assumes the Green Belt boundaries are fixed in an adopted plan and that any suggestion that sites should be allocated for development will result in land being taken out of the Green Belt (in which case the second sentence of paragraph 83 of the NPPF would apply i.e. Green Belt boundaries should only be altered in exceptional circumstances). This is an erroneous assumption because the Green Belt boundaries around York are being defined (or established) for the first time. They are not being altered. In this case, paragraph 85 of the NPPF is therefore the Key advice to be considered. It is not a question of what land should be taken out of the Green Belt. The Council is at the point of deciding what land should not be included in the Green Belt in order to meet the identified requirements for sustainable development.	O'Neill Planning Consultatnts representing SBO Lands Ltd.
10988	Comm	Questions need to build on green field sites when there are plenty of brown field sites available to satisfy demand.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

12389	comm	A fundamental review of the green belt boundaries is long overdue and would be in accordance with NPPG guidance (para 85) to plan positively for sustainable growth to meet overall housing need.	
13003	Comm	The Green Belt does need defining, but with the delays expected in the Plan due to the under development proposed, this further risks the Green Belt.	Rachael Maskell MP
13026	comm	Recent examples in approved Development Plans of what constitutes "well beyond the plan period" in relation to greenbelt permanence. Can equate to additional 10% of land allocations, an additional 5 years worth of land or in some cases 10 years worth of land.	
13027	comm	Recent examples in approved Development Plans of what constitutes "well beyond the plan period" in relation to greenbelt permanence. Can equate to additional 10% of land allocations, an additional 5 years worth of land or in some cases 10 years worth of land.	PBPlanning on behalf of David Wilson Homes.
13030	Comm	A total of 347 ha of land will be removed from the Green Belt to deliver the housing requirements of the Local Plan and a limited period beyond (5 years). York has been reliant on its urban land supply to meet its housing requirements for many years insofar as no designated Green Belt land has been permitted to be developed either through its removal from the Green Belt or via speculative planning applications. Over the ten year period to 2016/17, the urban area has delivered a net increase of 5,748 dwellings at an average of 579 dwellings per annum. Brownfield land is a diminishing source of sites and it is highly questionable whether historic rates of delivery from this source can be sustained going forward. This brings into question the likelihood of a 26% increase in annual yield from urban sites over the next 16 years compared with the previous 10 years, as assumed in the Plan	Turley representing Gallagher Estates
13274	Comm	Green belt should remain as green belt, not bricks and concrete.	
13417	Comm	Wants the Green Belt to be protected. York has a wonderful green atmosphere and we must try to maintain it. Vital that brownfield sites are built out first and as soon as possible.	
13531	Comm	Concerned about the Green Belt which is unprotected at the moment.	
13542	Comm	Green Belt is at risk without a local plan, it should be pushed forward as a matter of urgency.	
13543	Comm	Green Belt is at risk without a local plan, it should be pushed forward as a matter of urgency.	
13628	Comm	Green Belt. Where is the measurement of 6 miles from the city centre measured from? The Green Belt boundary in many cases is not 6 miles from the city centre.	Poppleton Neighbourhood Plan Committee
13628	Comm	Para 3.15 states that Green Belt boundaries should be defined using definable features on the ground. What happens where features such as hedgerows and trees are removed?	Poppleton Neighbourhood Plan Committee

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13635	Comm	<p>In the absence of an adopted Local Plan, some considerable confusion surrounds the status of the Green Belt. Much of the commentary relating to the Green Belt speaks from a position that assumes the Green Belt boundaries are fixed in an adopted plan and that any suggestion that sites should be allocated for development will result in land being taken out of the Green Belt. This is an erroneous assumption because the Green Belt boundaries around York are being defined (or established) for the first time. They are not being altered. Thus, it is not a question of what land should be taken out of the Green Belt. The Council is at the point of deciding what land should not be included in the Green Belt in order to meet the identified requirements for sustainable development.</p>	O'Neill Associates on behalf of Malton Road Developments Ltd.
13637	Comm	<p>In general CPRENY supports this section within the Local Plan. Whilst Policy GB1 follows National Planning Guidance it is considered that the following words should be added to the first bullet point for purposes of clarification under the following heading - 'AND it is for one of the following purposes:  <u>*Buildings for existing agriculture or forestry activities;</u>'</p>	CPRE - North Yorkshire
10	Obj	<p>Policy DP1 (viii) identifies that the outer boundary of the York Green Belt "will" be 6 miles from the city centre. A small part of ERC's authority area would lie within 6 miles of the city centre boundary. ERC does not consider it appropriate for the York Local Plan to prescribe the exact extent of the outer Green Belt boundary where this would extend into a neighbouring local authority area. Policy DP1 (viii) should be amended to clarify that, where relevant, it will be for neighbouring authorities to determine the boundary which would be "about" miles from the centre of the city. This would reflect Policy SS1 of the City of York Local Plan Preferred Options as well as the Regional Spatial Strategy which is outlined in paragraph 1.50</p>	East Riding of Yorkshire Council



Pre-Publication Draft Local Plan (2018) summary of consultation responses

62	Obj	<p>The Green Belt proposed by the PPD is the residual of the open land not required to accommodate development needs in the plan period 2012-2033 and beyond to 2038. FPC considers this is not the correct approach for preparing detailed Green Belt boundaries for a historic city like York of international and national importance where its open land setting is a very important part of its special character. Instead, Green Belt boundaries should be based upon an assessment of what land is important for the five purposes of the Green Belt as set out in paragraph 80 of the Framework and in particular whether land needs to be kept open to preserve the setting and special character of the City. Only land which is not important for these purposes should be excluded from the Green Belt and considered further for potential development. York’s special character is not just related to the walled city or its conservation areas (such as Fulford) or even the green wedges extending into the City. It relates more to the general size, scale and character of York, especially as a compact city set in the open countryside. Fig 3.1. should be adjusted to show the entirety of the open land beyond the Outer Ring Road as it contributes to the special character and setting. It should also be adjusted to identify the value of the green buffer of open land which encircles the Outer Ring Road and the existing urban edge (except in the vicinity of Clifton). Views from the Outer Ring Road are of especial significance, particularly when they include views of the Minster which defines the location of the city centre and indicates the general scale and character of York. Serious harm would be caused to the special character of the City if development is allowed to intrude significantly into this green corridor around the City, and especially if it should come close to the Ring Road or even leap-frog it. This has already happened in the Clifton area where the harm to the special character is self-evident. We must emphasise that our view on this matter is very similar to that expressed by the Inspector who held the Inquiry into the York Green Belt Local Plan. (cont...)</p>	Fulford Parish Council
----	-----	--	------------------------

Pre-Publication Draft Local Plan (2018) summary of consultation responses

62	Obj	<p>(cont...) FPC considers that the PPD development proposals would cause serious harm to the setting and special character of the City as 1). Development would be brought much closer to the Outer Ring Road, intruding significantly into the sensitive buffer of open land between the main urban area and the road. At some points, the buffer would be reduced to a very narrow gap, sometimes little more than a landscaped strip. Such development would significantly damage the current perception of York as a compact historic town set into the open countryside. Instead it would appear as a sprawling large urban area extending out towards the Ring Road. The mistake of Clifton Moor would have been repeated. 2)The two large new settlements proposed would have major urbanising effects on the wider countryside setting of York beyond the Ring Road. These urbanising effects would not be confined to the sites themselves but would extend over much larger areas because of the need for major new transport and other infrastructure to service them. This infrastructure would include major new junctions onto the Outer Ring Road with very substantial land-takes in vulnerable parts of the Green Belt. The combined result would be a substantial deterioration in the landscape and other rural qualities of the open countryside which forms a belt around York and which the Green Belt is meant to preserve. (As a matter of detail, FPC agrees with the designation of open land to the west of the A19 as fulfilling green wedge and river corridor functions. It also agrees that the open land between the A64 and Fulford and Heslington makes a particular contribution to special character, not least because it fulfils the role of an attractive rural buffer to the Ring Road in this part of the City. After saying this, FPC considers that this designation should be extended to include all the open land to the south of Hull Road currently without planning permission for development as it too fulfils an important buffer function.)</p>	Fulford Parish Council
71	Obj	<p>The 2005 4th set of changes is the current Green Belt boundary. The Poppleton Neighbourhood Plan is now a statutory document and shows the settlement line and Green Belt boundary. The latest version of the Local Plan 2017 indicates an alteration to the boundary of the Green Belt that no longer matches the settlement boundary of Poppleton - to the rear of properties on Station Road in particular. Oppose any change to the Green Belt/settlement line.</p>	Nether Poppleton Parish Council
71	Obj	<p>The 2005 4th set of changes is the current Green Belt boundary. The Poppleton Neighbourhood Plan is now a statutory document and shows the settlement line and Green Belt boundary. The latest version of the Local Plan 2017 indicates an alteration to the boundary of the Green Belt that no longer matches the settlement boundary of Poppleton - to the rear of properties on Station Road in particular. Oppose any change to the Green Belt/settlement line.</p>	Poppleton Neighbourhood Plan Committee

Pre-Publication Draft Local Plan (2018) summary of consultation responses

78	Obj	The 2005 4th set of changes is the current Green Belt boundary. The Poppleton Neighbourhood Plan is now a statutory document and shows the settlement line and Green Belt boundary. The latest version of the Local Plan 2017 indicates an alteration to the boundary of the Green Belt that no longer matches the settlement boundary of Poppleton - to the rear of properties on Station Road in particular. Oppose any change to the Green Belt/settlement line.	Upper Poppleton Parish Council
187	Obj	The Chamber is increasing concerned at the failure of the Council to acknowledge the need to exclude enough land from the Green Belt. As the Plan is defining Green Belt boundaries for the first time, this is the moment to ensure adequate land, in the form of allocations and safeguarded land, is excluded from the Green Belt to provide flexibility to respond to as yet unknown land requirements and to meet the development needs of the city.	York and North Yorkshire Chamber of Commerce
220	obj	The York Green belt proposed around the Racecourse is unduly restrictive and places the existing racecourse buildings in the Green Belt with no acknowledgement of the developed nature of the sites. This will not allow for future change to manage adaptation and evolution of facilities at the racecourse given that Green Belt policy will apply and change may be deemed inappropriate development. This is counter to Policy EC4 which promotes the racecourse as a tourism venue. Previously this area was designated in policy GB10 as a "Major Developed site in the Green Belt". Although it is accepted that the NPPF no longer includes this policy, it does not prevent a similar designation being made within the plan. There is inconsistency across the plan how previous sites of this designation have been treated. Two options are proposed to rectify this for the racecourse: 1) The areas previously designated in policy GB10 should be removed from the Green Belt or 2) an appropriate policy is included which continues to recognise the developed nature of the racecourse and provides flexibility as with the former GB10 policy. Both options would offer a degree of to the operational ability and long-term sustainable success of the Racecourse.	
431	Obj	The allocations in table 5.1 of the Plan amount to 14,899 dwellings for the 20-year period 2017 to 2038. For the 15 year Plan period the housing provision is over 3,000 dwellings short of the representor's estimated housing requirement of 15,254 dwellings. For the 5-year period following the Plan period, the shortfall is 1,782 using the Council's figures or 2,797 short using the representor's figures. This illustrates that the Council cannot demonstrate that Green Belt boundaries will endure beyond the Plan period thus failing one of the fundamental objectives of Green Belt Policy in the NPPF. Without additional housing land allocations, the Green Belt boundaries cannot be confirmed.	O'Neill Planning Consultatnts Representing Shepherd Homes

Pre-Publication Draft Local Plan (2018) summary of consultation responses

540	Obj	Object to the Green Belt boundaries as currently drafted. The Green Belt should not include land which it is unnecessary to keep permanently open (NPPF paragraph 85). Some difficulty in understanding the justification for now including some sites within the Green Belt which have previously been proposed in total or in part for development (eg. North of Escrick, West of Copmanthorpe, North of Hull Road / Grimston Bar). The potential development of these sites could not have been contemplated at previous stages of the Plan process if they were thought to contribute to the main or any other purpose of the Green Belt. There is no justification for defining the outer boundaries which are beyond 6 miles from the City Centre. No justification for the outer boundary of the Green Belt immediately to the north of Escrick - the Green Belt just stops where it hits the administrative boundary.	Jennifer Hubbard Town Planning Consultant
544	Obj	The general approach to the green belt and the lack of safeguarded land is not properly addressed and is supported by inadequate evidence base. No justification to support green belt being more than 6 miles beyond the centre of York.	
1673	obj	The Walnut Close area is surrounded by development and cannot credibly perform Green Belt function. Green Belt boundary should be revised logically to be south along Holmfield land and then east to the RO of Halifax College / continue along Heslington Lane/ Main StreetWest. Revised university boundary critical to ensure enduring green belt.	O'Neills Associates on behalf of University of York
6663	Obj	Not enough land is identified to set an enduring Green Belt for the first time. No safeguarded land or safeguarded land policy is proposed in the Local Plan; This approach is unsound. Although the Council rely on strategic sites to develop out over a longer period, provision in the longer is severely limited and therefore safeguarded land should be identified to ensure the Green Belt endures. This approach is endorsed by Counsel statements. . The approach taken in the Publication draft (2014) and Preferred Options (2013) is supported. Far greater harm to the Green Belt may come from not allocating safeguarded land. It is considered that the plan will not be able to demonstrate a 5 year housing land supply and therefore the Green Belt will have to be reviewed early. The timescale of the plan is only likely to be 12-13 years fom adoption of the plan. This will not create a permanent or enduring green belt. 10 years post plan should be used rather than 5 to create permanence. NPPF requires local planning authorities to maintain a 5-year housing land supply. The Plan does not provide sufficient sites to deliver this, meaning that the Council would have to undertake a review of the Plan to identify additional sites before the end date of the Plan. If there us no 5-year housing supply there will be significant pressure to amend the greenbelt in 2032 or earlier.	DPP obo Linden Homes Strategic Land

Pre-Publication Draft Local Plan (2018) summary of consultation responses

9254	obj	Evidence base to support the detailed green belt boundaries is absent and key decisions in relation to the spatial strategy have been made without an adequate evidence base. Safeguarded land should be provided to ensure the Green belt can endure 10-15 years beyond the plan period. The Plan needs to strike a balance for land release now, avoiding a new for a green belt review at the end of the plan period and unnecessary releases from the green belt at this time. The current approach is contrary to NPPF.	How Planning on behalf of Barwood Strategic Land LLP
9381	obj	Not enough land is identified to set an enduring Green Belt for the first time. No safeguarded land or safeguarded land policy is proposed in the Local Plan; This approach is unsound. Although the Council rely on strategic sites to develop out over a longer period, provision in the longer is severely limited and therefore safeguarded land should be identified to ensure the Green Belt endures. This approach is endorsed by Counsel statements. . The approach taken in the Publication draft (2014) and Preferred Options (2013) is supported. Far greater harm to the Green Belt may come from not allocating safeguarded land. It is considered that the plan will not be able to demonstrate a 5 year housing land supply and therefore the Green Belt will have to be reviewed early. The timescale of the plan is only likely to be 12-13 years fom adoption of the plan. This will not create a permanent or enduring green belt. 10 years post plan should be used rather than 5 to create permanence. Site SF4 should be excluded from the Green belt as it is not required to keep permanently open. Reinstatement of this site in the Green belt goes against national policy	DPP Planning on behalf of Linden Homes
9381	obj	It is considered that the plan will not be able to demonstrate a 5 year housing land supply and therefore the Green Belt will have to be reviewed early. The timescale of the plan is only likely to be 12-13 years fom adoption of the plan. This will not create a permanent or enduring green belt. Lack of safeguarded land is an unsound approach.	DPP Planning on behalf of Linden Homes
9883	Obj	The allocations in table 5.1 of the Plan amount to 14,899 dwellings for the 20-year period 2017 to 2038. For the 15 year Plan period the housing provision is over 3,000 dwellings short of the representor's estimated housing requirement of 15,254 dwellings. For the 5-year period following the Plan period, the shortfall is 1,782 using the Council's figures or 2,797 short using the representor's figures. This illustrates that the Council cannot demonstrate that Green Belt boundaries will endure beyond the Plan period thus failing one of the fundamental objectives of Green Belt Policy in the NPPF. Without additional housing land allocations, the Green Belt boundaries cannot be confirmed.	O'Neill Planning Consultatnts representing SBO Lands Ltd.
10097	obj	Site ST13 should be omitted from the Green Belt as it does not serve Green Belt purposes and is not important to keep permanently open.	DPP Planning on behalf of Shepherd Homes

Pre-Publication Draft Local Plan (2018) summary of consultation responses

10097	obj	It is considered that the plan will not be able to demonstrate a 5 year housing land supply and therefore the Green Belt will have to be reviewed early. The timescale of the plan is only likely to be 12-13 years fom adoption of the plan. This will not create a permanent or enduring green belt. Lack of safeguarded land is an unsound approach.	DPP Planning on behalf of Shepherd Homes
12560	obj	It is considered that the plan will not be able to demonstrate a 5 year housing land supply and therefore the Green Belt will have to be reviewed early. The timescale of the plan is only likely to be 12-13 years fom adoption of the plan. This will not create a permanent or enduring green belt. Lack of safeguarded land is an unsound approach.	DPP on behalf of landowner
12655	obj	<p>An alternative boundary is proposed for ST35 to include part of the site currently excluded and within the Green Belt; a site plan is provided. It is considered that currently the boundary is illogical and the amendment would fit national policy regarding green belts creating a clear and defensible boundary to the site. It is not considered that this parcel contributes to the Green Belt.</p> <p>An alternative boundary is proposed for ST36 to include part of the site currently excluded and within the Green Belt tot he east; a site plan is provided. It is considered that a revision to the boundary to extend the site would facilitate an enduring Green Belt boundary enduring beyond the plan period. It is not considered that this parcel contributes to the Green Belt.</p>	GVA on behalf of DIO Estates (MOD)
13030	Obj	<p>Going forward, a more conservative estimate of say 15% increase in yield from the urban area is more realistic and provides a more robust basis on which to plan for meeting the Local Plan’s housing needs. Notwithstanding this, the Council has presented no evidence that the assumed urban capacity is deliverable. This supply must be subject to further deliverability testing and until this time, this supply cannot be assumed to be deliverable over the plan period. This aspect of the plan is not sufficiently justified and is therefore unsound. Paragraph 83 of the NPPF advises that in Local Authorities should define Green Belt boundaries having regard to their intended permanence in the long term. Seeking to meet development needs for only five years after the plan period is not consistent with the NPPF requirement to ensure Green Belts endure over the ‘long term’. The emerging Local Plan should therefore seek to define Green Belt boundaries to ensure these can endure for at least ten years after the plan period.</p>	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13030	Obj	<p>Calculations made by the representor demonstrate a need to release land capable of delivering at least 9,653 residential units from the Green Belt to meet needs over the plan period and beyond based on a requirement for 867 residential units per annum, or 17,275 units based on a requirement for 1,070 units per annum. This compares to the Plan proposal to release 347 ha of land from the Green Belt to deliver 6,590 units, representing a shortfall of between 4,051 and 10,685 units and approximately 202 to 534 ha.</p>	Turley representing Gallagher Estates
13093	obj	<p>The proposed Green Belt boundaries are not defensible because insufficient land has been excluded to meet development needs beyond the 15 year plan period. The Council cannot demonstrate the Green Belt boundaries will endure post plan period fails one of the fundamental objectives of policy in the NPPF. The Plan should allow for 10 years beyond the plan period either through allocations or safeguarded land to provide robust Green Belt boundaries. The Council's evidence base that have informed the approach to the definition of Green Belt since 2003 (Green Belt Appraisal and subsequent documents) provide useful technical analysis but are evidence base for an unadopted plan and consequently have no statutory basis.</p>	O'Neill Associates on behalf of Jorvik Homes
13099	obj	<p>The proposed Green Belt boundaries are not defensible because insufficient land has been excluded to meet development needs beyond the 15 year plan period. The Council cannot demonstrate the Green Belt boundaries will endure post plan period fails one of the fundamental objectives of policy in the NPPF. The Plan should allow for 10 years beyond the plan period either through allocations or safeguarded land to provide robust Green Belt boundaries. The Council's evidence base that have informed the approach to the definition of Green Belt since 2003 (Green Belt Appraisal and subsequent documents) provide useful technical analysis but are evidence base for an unadopted plan and consequently have no statutory basis.</p>	O'Neills Associates on behalf of Galtrees Garden Village Development Company
13106	Obj	<p>Objects to the lack of identified safeguarded land. Safeguarded Land is a requirement of green belt permanence, noting that York will be setting its green belt for the first time. It would also provide flexibility and allow land to be brought forward quickly without a fundamental review of the Local Plan if identified sites were unable to deliver the quantum of development envisaged. The approach conflicts with Counsel advice (ref John Hobson QC - <i>"In my opinion if no safeguarded land is identified in the emerging Local Plan this would give rise to a serious risk of the Plan being found unsound. There would be a failure to identify how longer term needs of the area could be met, and in particular a failure to indicate how those longer term needs could be met without encroaching into the Green Belt and eroding its boundaries."</i> Counsel have also advised that it would be appropriate for the green belt to endure for a ten year period beyond the life of the Plan. We therefore request that the Plan is amended accordingly to ensure that it is effective and consistent with national policy.</p>	Johnson Mowat obo landowner

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13525	Obj	Insufficient attention is given to the Green Belt plan.	
13628	Obj	The 2005 4th set of changes is the current Green Belt boundary. The Poppleton Neighbourhood Plan is now a statutory document and shows the settlement line and Green Belt boundary. The latest version of the Local Plan 2017 indicates an alteration to the boundary of the Green Belt that no longer matches the settlement boundary of Poppleton - to the rear of properties on Station Road in particular. Oppose any change to the Green Belt/settlement line.	Poppleton Neighbourhood Plan Committee
13635	Obj	The 2013 Preferred Options Draft Local Plan sensibly included a reasonable amount of safeguarded land to ensure the proposed Green Belt Boundaries would remain permanent beyond the Plan period. Unfortunately, this sensibility appears to have been abandoned in the latest further site consultation document. The previous two Planning Inspectors in 2000 and 2010 both dismissed the draft Development Plan due to a lack of evidence confirming that Green Belt boundaries would endure beyond the Plan period. The omission of this key component of the Local Plan spatial strategy is a serious weakness and may well result in the Plan being found unsound, particularly as the Plan period is only up to 2033.	O'Neill Associates on behalf of Malton Road Developments Ltd.
13639	Obj	Objects to the huge amount of building planned on Green Belt.	
13653	Obj	The Plan fails to provide sufficient land for housing and does not contain safeguarded land. Consider that safeguarded land is needed to provide degree of permanence to the Green Belt boundary.	Johnson Mowat on behalf of Yorvik Homes
60	Supp	Earswick PC wish to support latest draft LP whereby safeguarded land is no longer designated. Also the protection of environmental assets (including those of historic character and setting, nature and conservation); protection of open space and prevention of coalescence of villages and/or main urban areas. Also support setting a detailed green belt boundary - CYC should also consider the period beyond the plan period to 2037 - a requirement of the NPPF. Earswick PC note that the plan echoes the wishes expressed by residents in the last round of consultation to; *protect as much green belt as possible *retain agricultural land with open views to the countryside *maintain the character and individuality of our ancient villages *mitigate overloading of infrastructure and public services *prevent traffic congestion and consequential environmental pollution on routes into/out of city	Earswick Parish Council
77	Supp	Welcome the confirmation in paragraph 2.10 of the value of the surrounding villages, the green infrastructure and the primary function of York's Green Belt in preserving its setting and special character.	Strensall With Towthorpe Parish Council



Pre-Publication Draft Local Plan (2018) summary of consultation responses

77	Supp	Support the policies in paras 3.6 - 3.8 referring to the use of green wedges to prevent coalescence of settlements and protect the special character of York and the protection of sensitive environmental sites a shown in Fig 3.1 and 3.2.	Strensall With Towthorpe Parish Council
244	Supp	Support the removal of the Designer Outlet from the Green Belt.	NTR Planning obo McArthur Glen, Aviva Investors & York Designer Outlet
2846	Supp	Welcome the confirmation in paragraph 2.10 of the value of the surrounding villages, the green infrastructure and the primary function of York's Green Belt in preserving its setting and special character.	
2846	Supp	Support the policies in paras 3.6 - 3.8 referring to the use of green wedges to prevent coalescence of settlements and protect the special character of York and the protection of sensitive environmental sites a shown in Fig 3.1 and 3.2.	
8032	Supp	Glad to see the Green Belt protected. It is necessary to protect the countryside alongside urban development - I think the plan goes a long way to doing this. Appreciate the effort put into the plan to find acceptable solutions.	
13117	Supp	Supports keeping the strip of land between Avon Drive and the northern ring road as green belt and preserving the green belt around the city.	

<b>Gypsies, Travellers and Showpeople</b>			
262	Obj	Para. 1.47. Text gives the impressions that CYC only make provision for Gypsies and Travellers because Government policy requires it to do so. Para should be re-written to indicate that G&Ts are York's longest established but also most disadvantaged ethnic minority, many live in bricks and mortar housing, the plan aims to address shortage of accommodation, and addressing the needs of the community is one of the ways that the plan will enable York to deliver on its commitments as the UK's first Human Rights City.	York Travellers Trust
262	Obj	Para. 5.38, Table 5.3 of the Local Plan refer to the Gypsy, Traveller and Showpeople Accommodation Assessment (2017). Number of concerns with the GTAA (2017) as it underestimates the needs of G&Ts. Concerns include: the stakeholder involvement didn't include the Travellers themselves, there is a much greater need for G&Ts living in bricks and mortar, may also be need for nomadic travellers and those wanting to move to the area, there are inconsistencies between the findings and the figures.	York Travellers Trust
1654	Obj	Do not accept the outcome of the research which concludes that only 3 pitches are needed for those meeting the definition. This represents less than 10% of the assessed need.	The National Federation of Gypsy Liaison Groups
13529	Supp	It would make sense to make the temporary planning permission (SP1) permanent for the benefit of the family currently living there.	

Renewable Energy and Climate Change			
80	Comm	Need for energy arrangements requires careful consideration particularly if wind farms are envisaged in the area.	Wigginton Parish Council
192	Comm	Solar Panels - impact on the historic roof-scape of York (and in conservation areas) is this controlled anywhere in the Local Plan?	
384	Comm	Given the squeeze on living standards, fuel poverty and threat from climate change low carbon sustainable design and working to zero carbon at the earliest opportunity is essential. Local renewable energy supply including wind and solar should be strongly supported and carbon polluting fracking banned. District heating for York Central and possibly other large developments should be essential. There are opportunities for the use of modular housing construction to help speedily address the housing crisis in the city and if constructed locally (Portakabin) will regenerate York's manufacturing base.	York TUC
3159	Obj	Objecting to any wind turbine development at Dunnington / Scoreby as they will be damaging to views / the landscape, flashing lights on the turbines will disturb residents. This is one of the few greenbelt farming areas around the city within its boundary and should not be built on. Solar panels should be made mandatory on all new housing instead.	
4636	Obj	Objecting to any wind turbine development at Dunnington / Scoreby as they will be damaging to views / the landscape, flashing lights on the turbines will disturb residents. This is one of the few greenbelt farming areas around the city within its boundary and should not be built on. Solar panels should be made mandatory on all new housing instead.	
12245	Comm	While controls should be in place NFU believe farming can play a key role in meeting government renewable energy targets committing to produce at least 15% energy from renewable by 2020. Since 2007, NFU has led a joint agriculture climate change task force in recognition the many opportunities to tackle climate change and developing a greenhouse gas action plan for our sector. Robust responses have been submitted to government on its renewable energy strategy and incentive schemes for renewable electricity heat and transport fuels. With 75% of UK land in agricultural sector NFU believes its members are well placed to capture renewable natural energy flows whilst maintaining its normal roles. NFUs stated aspirations are that every farmer and grower should have the opportunity to diversify and create green jobs by supplying renewable energy services.	NFU

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13003	Comm	All new houses should be built to the highest environmental standards, should be carbon neutral and should lower energy need. In addition housing should meet the needs of the community, enabling homes to be suitable for disabled people as well as non-disabled people. Rooms should be built to high quality guidance to ensure that people are not living in cramped accommodation.	Rachael Maskell MP
13204	Supp	The Plan supports the aim of increasing the amount of energy generated from renewable and low carbon sources. It also supports proposals for renewable and low carbon energy infrastructure where appropriate. These elements of the Plan are well aligned with the SEP. The Plan also looks to create sustainable locations by concentrating growth to the existing hierarchy of settlements, this is consistent with the SEP's aspirations in relation to resource efficiency.	Leeds City Region Local Enterprise Partnership
13213	Supp	The HCA supports the principles of Policies CC1 to CC3	GVA on behalf of the Homes and Communities Agency (HCA)
13384	Obj	Objecting to any wind turbine development at Dunnington / Scoreby as they will be damaging to views / the landscape, flashing lights on the turbines will disturb residents. This is one of the few greenbelt farming areas around the city within its boundary and should not be built on. Solar panels should be made mandatory on all new housing instead.	
13385	Obj	Objecting to any wind turbine development at Dunnington / Scoreby as they will be damaging to views / the landscape, flashing lights on the turbines will disturb residents. This is one of the few greenbelt farming areas around the city within its boundary and should not be built on. Solar panels should be made mandatory on all new housing instead.	
13470	Comm	There should be a stronger commitment to addressing Climate Change on a local level. There should be less reliance on the car, encouraging more walking and cycling and low-energy urban infrastructure.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13550	Obj	<p>The draft Local Plan makes a number of references to sustainable development but this only plays lip service to the core concepts. Concern over the information in Para 1.29 in relation to the predicted rise in York's population and how this is not sustainable providing new homes and services to meet population growth will inevitably lead to growth in carbon emissions. The degree of population growth is not compatible with the UK's climate change targets. A particular concern in relation to sustainable development is for population not to exceed its means of food production and the Local Plan proposing development on agricultural land around York. The short term solutions should be high density apartments sized for families built on brownfield sites and linked up to district heating schemes. The Local Plan also fails to address support infrastructure required for the new developments proposed.</p>	
13584	Supp	<p>The Plan supports the aim of increasing the amount of energy generated from renewable and low carbon sources. It also supports proposals for renewable and low carbon energy infrastructure where appropriate. These elements of the Plan are well aligned with the SEP. The Plan also looks to create sustainable locations by concentrating growth to the existing hierarchy of settlements, this is consistent with the SEP's aspirations in relation to resource efficiency.</p>	West Yorkshire Combined Authority
13593	Comm	<p>Commenting on the SHMA but asks where references to renewable energy are.</p>	
13600	Comm	<p>25% of UK carbon dioxide emissions are generated by transport, however, there are no measures proposed in the Climate Change Section of the Plan to reduce emissions by reducing road traffic in the Plan area. The Environmental Quality and Flood Risk Section does refer to the reduction of emissions, however, this is in the context of air quality. There should be an explicit statement that CYCs strategy for mitigating climate change in the area included reducing carbon emissions from road transport.</p>	

<b>Sustainable Construction</b>			
145	Obj	Objects to policies seeking to set standards for new dwellings i.e. DP3, CC1, CC2 and CC3. To comply with NPPF developers should not be subject to obligations that threaten viability. The Council needs to ensure that these policies are taken into account and their cumulative impact on viability is considered, the need for such policies must be justified by evidence. Council should be aware of a written ministerial statement dated 25th March 2015 which introduced the Government's Housing Standards, local authorities should not be seeking to require additional standards over and above this.	Home Builders Federat
384	Comm	Given the squeeze on living standards, fuel poverty and threat from climate change low carbon sustainable design and working to zero carbon at the earliest opportunity is essential. Local renewable energy supply including wind and solar should be strongly supported and carbon polluting fracking banned. District heating for York Central and possibly other large developments should be essential. There are opportunities for the use of modular housing construction to help speedily address the housing crisis in the city and if constructed locally (Portakabin) will regenerate York's manufacturing base.	York TUC
13003	Comm	All new houses should be built to the highest environmental standards, should be carbon neutral and should lower energy need. In addition housing should meet the needs of the community, enabling homes to be suitable for disabled people as well as non-disabled people. Rooms should be built to high quality guidance to ensure that people are not living in cramped accommodation.	Rachael Maskell MP
13025	Obj	Unclear what benchmarks will be used to assess the build quality and lifecycle performance of the dwellings.	Integrated Built Environment Ltd
13213	Supp	The HCA supports the principles of Policies CC1 to CC3	GVA on behalf of the Homes and Communities Agency (HCA)

Flooding and Drainage			
3	Comm	The Environment Agency (EA) is keen to develop the York Urban Becks Project. This will initially focus on Osbaldwick and Tang Hall Beck. Initial contacts for developing any Catchment Partnership Projects in the Foss or Ouse Catchment are <a href="mailto:rita.mercer@yorkshiredalesrivertrust.com">rita.mercer@yorkshiredalesrivertrust.com</a> or <a href="mailto:Claire.tunningley@environment-agency.gov.uk">Claire.tunningley@environment-agency.gov.uk</a>	Environment Agency
3	Obj	Given the level of flood risk in York and the high profile nature of the subject, it should have its own section within the local Plan.	Environment Agency
71	Obj	The Green Infrastructure network is basically the essential flood plains for the River Ouse but they are not mentioned as such in the policy.	Nether Poppleton Parish Council
71	Comm	In order to protect residents, development should avoid the use of flood plain areas. For example, despite assurances, the area around the Poppleton Park and Ride site gets flooded.	Nether Poppleton Parish Council
78	Obj	The Green Infrastructure network is basically the essential flood plains for the River Ouse but they are not mentioned as such in the policy.	Upper Poppleton Parish Council
78	Comm	In order to protect residents, development should avoid the use of flood plain areas. For example, despite assurances, the area around the Poppleton Park and Ride site gets flooded.	Upper Poppleton Parish Council
80	Comm	Current drainage and sewerage management in Haxby and Wigginton fails periodically causing problems for residents. More housing will make this worse so it needs to be addressed.	Wigginton Parish Council
9208	obj	Object to the flood risk maps that underpin assumptions in the draft Local Plan. It is considered that this is out-of-date and inaccurate; issue also raised with Environment Agency. Flood maps need updating.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

12245	Comm	All developments should be free from the risk of surface water flooding in a 1 in a 100 year flood event, plus allowance for climate change. Surface water run off from green fields should be restricted to the existing rate. The surface runoff rate from previously developed land should be established prior to redevelopment and runoff restricted to 70% of this rate or to Greenfield rates. Restricted runoff should be applied using flow control devices with on-site attenuation and other sustainable drainage systems (SuDS) measures. For smaller sites there may be limited opportunities for attenuation apparatus and source control measures alone may need to be considered to manage runoff. In accordance with building regulations consideration should be given to infiltrate surface water into the ground wherever possible followed by discharge into an open watercourse, culverted watercourse and finally a combined public sewer system. NFU strongly encourage development to be favoured in low risk flood zones. Where sites are split into parts due to flood risk would ask that careful consideration is given to the removal of water and where it is to be conveyed to. Green space and particularly agricultural land should not be seen as less valuable than properties as part of flood assessments when determining where flood water can be moved to.	NFU
12284	Comm	More trees should be planted along the rivers and throughout more housing and industrial areas to help with flooding , slowing soak up and releasing ground water as well as helping air quality and wildlife.	
12821	Obj	Treatment works at Strensall are working in full capacity and could not accept more waste.	
13003	Comm	The flooding issues facing York are made worse by intense development. City of York Council is failing to do enough to work with partners to retain more water upstream and to hold water before it comes into York.	Rachael Maskell MP
13003	Obj	The sewage/drainage system in York is at capacity. In placing more stress on the infrastructure there are higher risks of drain collapse and blockage, overflow and flooding. The lack of attention given to this infrastructure, when more demand will be placed on the system, is also deeply worrying. Mitigation of flooding and air quality through creating more green urban space and planting is needed. The Plan does not address these essential planning details.	Rachael Maskell MP
13288	Comm	Every time there is substantial rainfall there is flooding at the Water Lane / Clifton junction	
13628	Obj	The Green Infrastructure network is basically the essential flood plains for the River Ouse but they are not mentioned as such in the policy.	Poppleton Neighbourhood Plan Committee
13628	Comm	In order to protect residents, development should avoid the use of flood plain areas. For example, despite assurances, the area around the Poppleton Park and Ride site gets flooded.	Poppleton Neighbourhood Plan Committee



Pre-Publication Draft Local Plan (2018) summary of consultation responses

13637	Supp	CPRENY supports the Flood Risk policies contained within Section 12.	CPRE - North Yorkshire
71	Obj	The Green Infrastructure network is basically the essential flood plains for the River Ouse but they are not mentioned as such in the policy.	Poppleton Neighbourhood Plan Committee
71	Comm	In order to protect residents, development should avoid the use of flood plain areas. For example, despite assurances, the area around the Poppleton Park and Ride site gets flooded.	Poppleton Neighbourhood Plan Committee

Pre-Publication Draft Local Plan (2018) summary of consultation responses

<b>Waste and Minerals, incl Fracking</b>			
11	Obj	The Joint City of York, North Yorkshire and North York Moors Waste and Minerals Local Plan is incorrectly titled. It should be amended to refer to the Minerals and Waste Joint Plan.	North Yorkshire County Council
80	Comm	There has been an erosion of waste facilities in York caused by the closure and reduction of available access to disposal sites. It is likely that existing sites will fail to cope with increased demands.	Wigginton Parish Council
80	Comm	The current regional and national debates in respect of Fracking should also focus on the impact of such activity on not only Haxby and Wigginton but also York as a whole.	Wigginton Parish Council
348	Comm	There is limited coal mining legacy in York, namely two mine entries located towards the southern boundary. As there are no allocations proposed in this area, the Coal Authority has no specific comments to make.	The Coal Authority
13473	Comm	Planned approach to waste management cannot be sustainable - those living in the west of the city have to travel in to the city centre (traffic and pollution issues). Also likely to increase fly-tipping.	
13552	Comm	In favour of 'fracked' natural gas being part of the current UK energy mix and there is no reason why, outside the historic core that can't happen within the boundary of CYC.	
13637	Comm	CPRENY have actively commented on the Joint M&W Plan and as such have no further comments on this section.	CPRE - North Yorkshire

Transport			
4	Comm	When considering local Plan proposals Highways England (HE) is required to assess their 'cumulative and individual impacts[...]on the ability of the various road links and junctions to accommodate the forecast traffic flows in terms of capacity and safety.' HE requires that the capacity enhancements and infrastructure needed to deliver strategic growth is identified at the plan making stage to allow it time to assess the suitability, viability and deliverability of such proposals on the strategic road network (SRN) at the earliest opportunity. HE's comments also take account of committed and planned investment in the SRN set out in the Department for Transport's Road Investment strategy (RIS). The RIS Road Period 2 does identify a scheme for the A64 Hopgrove Roundabout (A64/A1237) that is in preparation with the aim of inclusion for implementation in the next roads period (2020 to 2025). He reiterated its belief, expressed in its consultation responses in 2013 and 2016, that spatial distribution and particularly the development of land opportunities in the south and eastern parts of York should be dependent upon agreement between the Council and HE of a Management Strategy for the A64 and its junctions with the local primary road network.	Highways England
4	Comm	Where the need for assessments of cumulative impact is identified, it must be included in the Transport Assessment. HE expects that the strategic sites located around the A1237 Northern Ring Road will combine to have a significant impact on the junctions of the A1237 with that A64 east and west of York. It will need to have a good understanding of that cumulative impact if it is to be able to state that the Plan is sound at Publication Draft stage. HE will continue to work in partnership with CYC to understand the impact of the Local Plan proposals on the operation of the A64 and its junctions with the primary road network. HE needs to determine if and where physical capacity enhancements are needed on the A64, that they are feasible and that they are affordable. This is essential to enable it to reach a position where it can find the proposals in the Local Plan to be sound at Publication Draft stage.	Highways England
4	Obj	The Plan lacks a recognition that the scale of the forecast traffic growth on the A64 trunk road and its junctions with local primary roads will require physical mitigation in the form of investment in highway infrastructure despite the extensive sustainable travel proposals.	Highways England
4	Supp	Welcome the emphasis on sustainable travel, high quality public transport links serving new sustainable communities and travel planning as key components of policy, and that new development sites are located with good access to public transport, walking and cycling networks, thereby minimising growth in traffic.	Highways England

Pre-Publication Draft Local Plan (2018) summary of consultation responses

10	Comm	The East Riding Local Plan recognises there is a strong functional relationship between the Vale of York sub-area, which is located to the northeast of the East Riding, and the city. The [ERC] Local Plan Strategy Document highlights that the attractiveness of East Riding as a location for those people working in York who want to live in a more rural location has resulted in significant pressure on the highway network and will necessitate improvements to the Grimston Bar (A64/A1079/A166) junction.	East Riding of Yorkshire Council
11	Comm	North Yorkshire County Council has produced a Strategic Transport Prospectus for North Yorkshire and the Strategic Transport Priorities therein are 1. Improving east to west connectivity (including Trans Pennine links), 2. Improving access to high speed and conventional rail, and 3. Improving long distance connectivity to the north and south. Several medium and long term transport aspirations have been identified to address these priorities. NYCC see the A59 as a key transport route for east to west connectivity.	North Yorkshire County Council
11	Comm	NYCC, as a neighbouring local highway authority, ask that within CYC's transport evidence account is taken of the traffic generated by the allocations of surrounding planning authorities, particularly Harrogate district and the Green Hammerton settlement and that committed developments within North Yorkshire that will impact on cross border issues are included.	North Yorkshire County Council
48	Comm	HPC would like to see the cumulative traffic flow impacts from these local developments - ST15, ST27, H56 and ST4 analysed by CYC/Developers to evidence that there will be no adverse traffic congestion for Hull Road, Field Lane, University Road and Heslington Lane.	Heslington Parish Council
59	Comm	The increase in car journeys arising from any new development in the village taken together with the increase in number of new houses proposed in surrounding areas will undoubtedly cause an increase in traffic on the A1079, A166 and the number of cars passing through the village. There are already major problems at the junction of the A1079 and Common Road and it will get worse. New traffic lights are required.	Dunnington Parish Council
71	Comm	There is a repeated suggestion that railway halts will be built at Poppleton Park and Haxby yet it is not within the remit of the Local Plan or Local Authority to develop these as they are the sole responsibility of the railway authority.	Nether Poppleton Parish Council
71	Comm	Sustainable modes of transport - this needs to be specifically defined e.g. Cars with low emission, electric cars. What is the city's plan for buses, taxis, vans and lorries? There is only limited provision for secure sites for bicycle parking. Cycle theft in the city is exceptionally high and nowhere in the plan is there provision to remedy this situation.	Nether Poppleton Parish Council
71	Obj	Para 2.15. Affordable transport links. Second bullet point: the word 'safe' should be inserted between strategic and cycling. Final new bullet point should refer to Park and Ride schemes on the roads from Wigginton and Haxby to the city.	Nether Poppleton Parish Council

Pre-Publication Draft Local Plan (2018) summary of consultation responses

76	Comm	The Parish council would seek to ensure safe access for the parish at Hazelbush junction. This should be considered as part of any development proposals at the MOD site at Strensall. The Coastliner bus is well used, so must not be compromised. The Parish Council would also strongly support the construction of a left filter lane at Hopgrove Lane South junction. This would allow the traffic to flow out of this junction and alleviate the heavy traffic congestion currently experienced.	Stockton-on-the-Forest Parish Council
77	Comm	Welcome the proposal in paragraph 1.5 for a new railway station in the Haxby area, but consider that a 'park & ride' station in open countryside on Towthorpe Road between Haxby & Strensall would serve both communities better.	Strensall With Towthorpe Parish Council
78	Comm	There is a repeated suggestion that railway halts will be built at Poppleton Park and Haxby yet it is not within the remit of the Local Plan or Local Authority to develop these as they are the sole responsibility of the railway authority.	Upper Poppleton Parish Council
78	Comm	Sustainable modes of transport - this needs to be specifically defined e.g. Cars with low emission, electric cars. What is the city's plan for buses, taxis, vans and lorries? There is only limited provision for secure sites for bicycle parking. Cycle theft in the city is exceptionally high and nowhere in the plan is there provision to remedy this situation.	Upper Poppleton Parish Council
78	Obj	Para 2.15. Affordable transport links. Second bullet point: the word 'safe' should be inserted between strategic and cycling. Final new bullet point should refer to Park and Ride schemes on the roads from Wigginton and Haxby to the city.	Upper Poppleton Parish Council
80	Comm	Access to proposed Haxby development is via two 'B' roads neither of which is suitable for high volume traffic. Conditions of the roads also poor. A1237 currently under strain, an increase in households and traffic will cause greater problems. Improvements similar to those on A19 and A59 junctions are needed but essentially from flyovers and underpasses.	Wigginton Parish Council
80	Comm	There is no off street parking in Wigginton. On street parking for shopping, banking, social activity and delivery vehicles causes congestion. Increased households will affect this even more.	Wigginton Parish Council
80	Comm	Public transport in Haxby and Wigginton is frequent but at times unreliable. A train halt is a longstanding proposal but if this becomes a reality that local infrastructure needs to be overhauled to cope with access and parking at new station.	Wigginton Parish Council
80	Comm	There are no safe cycle ways in Wigginton. The increase in development means that there is an urgent need to increase the number of safe cycle routes.	Wigginton Parish Council

Pre-Publication Draft Local Plan (2018) summary of consultation responses

86	Comm	States that it is clear that York was not built for as many cars as currently want to use it. The congested roads discourage more sustainable means of travel such as cycling. Proposes a light rail or tram system which links site ST15 with the University, Castle area and on to York central to address a long term issue of how to serve several existing communities and proposed developments in York with a modern low carbon transport solution. The proposal also encourages alternatives to car use, but acknowledges that the private car will remain a popular mode of transport for some years ahead. Details of route and stop locations included. Potential spurs also postulated.	
86	Comm	Road widening has led to an increase in the number of vehicles using the roads and little or no improvement in journey time. Additionally the problems of climate change and air quality mean that there is no way we should be proposing anything encourages or facilitates increased car use, with attendant CO2 and NOx particulate emissions.	
98	Comm	York Civic Trust recognises that the approach adopted largely follows that specified in the DfT WebTAG guidance, however it suggests that following that approach without modification to reflect York's current situation and expectations has led to an overestimate of the likely problems caused by the planned new development, specifically: CUBE model does not appear to reflect the use of walking and cycling as alternatives to the car; the ways in which new journeys are estimated has failed to reflect the secular changes in patterns of demand, the implications of emerging technologies, or the potential of a strategy of reducing the need to travel; the approach has apparently assumed that no additional provision will be made in new developments for public transport access. The current Transport Topic Paper overestimates the transport problems caused by the proposed new developments, and offers no solutions to these problems since the necessary tests to determine the traffic implications for the draft plan have not yet been conducted - this could well lead others to view the draft Plan as unacceptable. Recommend that additional homes are allocated to ST14/ST15 to justify requiring developed to provide dedicated public transport access. This approach could also assist the Council in responding to the recent uplift in housing need requirements.	York Civic Trust

Pre-Publication Draft Local Plan (2018) summary of consultation responses

98	Comm	<p>York Civic Trust recognises that the approach adopted largely follows that specified in the DfT WebTAG guidance, however it suggests that following that approach without modification to reflect York's current situation and expectations has led to an overestimate of the likely problems caused by the planned new development, specifically: CUBE model does not appear to reflect the use of walking and cycling as alternatives to the car; the ways in which new journeys are estimated has failed to reflect the secular changes in patterns of demand, the implications of emerging technologies, or the potential of a strategy of reducing the need to travel; the approach has apparently assumed that no additional provision will be made in new developments for public transport access. The current Transport Topic Paper overestimates the transport problems caused by the proposed new developments, and offers no solutions to these problems since the necessary tests to determine the traffic implications for the draft plan have not yet been conducted - this could well lead others to view the draft Plan as unacceptable. Recommend that additional homes are allocated to ST14/ST15 to justify requiring developed to provide dedicated public transport access. This approach could also assist the Council in responding to the recent uplift in housing need requirements.</p>	York Civic Trust
99	Comm	<p>The Local Plan presents an opportunity for York to lead the way with addressing air pollution and congestion, finding a solution for our city. York is ideally placed to make 'active transport', including cycling, more readily accessible to everyone. Increasing the level of cycling could be a big part of the solution for York and will 'future proof' our city to ensure it functions for everyone for decades to come. The York Cycle Campaign is keen to be involved in supporting progressive and sustainable vision, that will ensure the future of our city.</p>	York Cycle Campaign
99	Supp	<p>Pleased to see that many of the planning policies for the specific sites emphasise the need for routes to encourage pedestrian and cycle movements through the site.</p>	York Cycle Campaign
99	Comm	<p>York Cycle Campaign would like clear answers to the following questions: 1. Why are traffic levels predicted to increase at a greater rate than population increase ? 2. Why hasn't the impact of cycle traffic (and other forms of 'active travel') been included in the transport model? 3. What assumptions were made regarding peak time usage requirements in the transport model/ 4. how many cars per residential unit are assumed for the planned housing developments? 5. Has York's ageing population and its impact on the dependency ratio been taken into account in these calculations? 6. Has the impact of emergent and new transport technologies (such as electric cars, electric bikes and disability adapted bikes) been included in the modelling?</p>	York Cycle Campaign

Pre-Publication Draft Local Plan (2018) summary of consultation responses

99	Obj	Have grave concerns about the vision outlined in the paper and are dismayed at the lack of consideration given to cycling - find it bizarre that the paper doesn't mention cycling, or give data on current cycling habits and how they might change in the future - and other forms of sustainable transport. Concerned that cycling is not included in the model and its omission directly contradicts a number of the objectives in the Sustainability Appraisal; namely objectives 2, 6,7 and 12: Improve the health and wellbeing of York's population; Reduce the need to travel and deliver an integrated transport network; To minimise greenhouse gases that cause climate change and deliver a managed response to its effects; and improve air quality.	York Cycle Campaign
99	Obj	The Transport model figures suggest that the additional 12,990 households will generate approximately 7350 car journeys at peak times - these are questionable, based on the following evidence:2011 census figures for York state that approximately 25% of York's households didn't own a car or a van - this suggests that of the additional 12,990 households to be built by 2032 it can be expected that approximately 25% (3,248) will not own a car or a van; Currently York's dependency ratio (dependent population to working population) is 52.9% indicating that a significant proportion of households are not economically active and are unlikely to travel in peak periods; a sizeable proportion of York's population may own a car but chose to travel sustainably for much of the time. The forecasting indicating that 9,742 households will generate around 7,350 trips during the peak periods seems very high and are concerned that the transport modelling does not take [account] of the pro-sustainable transport elements of the Local Plan's policies that encourage a 'fundamental shift' away from the private car.	York Cycle Campaign
99	Obj	The transport model is failing to take into account likely changes in traffic and pollution legislation in the future. The Transport model used produces highly questionable results. York Cycle Campaign do not believe that the parameterisations used in the model are reasonable and question the transport projections they produce for the next 15 years. The current transport model (and the assumptions it rests upon) must be revised to ensure that all aspects of York's local plan are based upon rigorous evidence and that all forms of transport, and their impacts upon each other are carefully analysed.	
136	Comm	Major sections of the northern ring road cannot cope with existing traffic flow at busy times.	Skelton Village Trust
136	Comm	Users of the northern ring road will question the observation in the topic paper which underestimates the gravity of the problem and infers that the delivery of the Local plan takes priority regardless of a failure to provide necessary infrastructure improvements.	Skelton Village Trust
136	Comm	The A1237 is not just used by local traffic. The A19 feeds into it heavy commercial vehicles from the north east which are heading for the A1079 and the port of Hull.	Skelton Village Trust



Pre-Publication Draft Local Plan (2018) summary of consultation responses

136	Comm	Skelton and settlements to the east already experience traffic seeking to avoid the congested ring road. The proposed developments along the ring road will exacerbate the problem. Road infrastructure provision in the local plan proposals should recognise the problem being inflicted on residential areas as a result of ring road inadequacies.	Skelton Village Trust
187	Comm	The Chambers' 2016 Representation comments are superseded by the comment made in this representation. The scale of funding required to deliver the transport infrastructure identified in the Plan is significant, and considerable public sector funding will be required alongside the private sector funding. The Chamber will work with the Council to lobby Government to ensure the funding is forthcoming.	York and North Yorkshire Chamber of Commerce
192	Comm	It's commendable that the plan encourages walking and cycling but it is too optimistic in expecting to achieve as much as it suggests. Public transport is key. Using smaller buses would help alleviate congestion.	
384	Obj	The Transport section and policies & supporting Transport Topic Paper are completely inadequate. A projected 57% increase in congestion and associated air quality, noise, quality of life, travel delays for people/businesses is simply unacceptable. There is no analysis of what strategic public transport, cycling and walking improvements should be made to mitigate and address the traffic pressures. Where are measures to give buses priority at congested locations to provide attractive alternative to car drivers. These need stating so land can be dedicated and planning gain obtained to fund schemes. Similar points can be made about the pathetic strategic cycle routes. An updated study and version of the Transport Infrastructure Investment Requirements Study needs carrying out. Support provision of a new rail halt at Haxby but would like more as previously safeguarded in other parts of the city. The transshipment depot, CNG fuelling depot and former CC highway Depot reinstating. York's poor air quality must not be worsened by failing to plan adequate clean transport solutions.	York TUC
386	Comm	References to 'frequent bus services' through the document are welcome but in order to contribute significantly to model shift bus services must also be affordable and run reliably every evening till late and Saturday and Sundays. The requirement for public transport to be accessible within 400m walking distance of all parts of the site should be changed to 200m. This would be in keeping with our Health and Well Being Strategies and strategies to encourage active living amongst our growing older population (some of whom may be able to walk a shorter distance but not 400m, which is based on an average person's capacity).	York Green Party
1272	Comm	What contributions will new developments make to ensuring there are early morning and late evening, Saturday & Sunday services, not just daytimes?	York Bus Forum

Pre-Publication Draft Local Plan (2018) summary of consultation responses

1272	Obj	<p>The transport section and policies &amp; supporting analysis part of the document are completely inadequate. A projected 57% increase in congestion and the associated air quality, noise, quality of life, travel delays for people and businesses is simply unacceptable. There appears to be no analysis of what strategic public transport, cycling and walking improvements should be made to mitigate and address the traffic pressures indicated. The measures required to give buses priority to provide people with alternatives to driving need stating, examples being: 1) the conversion of the Leeman Road (Marble Arch) tunnel access into a public transport priority route, and bus &amp; cycle priorities on the proposed new York Central road access, 2) a public transport priority corridor from the main urban area to the suggested access to the new Elvington airfield community, 3) establishing a bus &amp; cycle link between Manor Lane &amp; Hurricane way at Clifton Moor, or 4) the local widening of Stonebow if and when Stonebow House is redeveloped to provide sufficient space for the bus stops and for buses to pass, etc..</p>	York Bus Forum
1272	Obj	<p>The previous Publication Draft of the Local Plan (September 2014) included an Annex E: Transport Infrastructure Investment Requirements Study. This listed a number of Local Transport investments required as part of the plan. Whilst a few of these are now being addressed, there is no reference to the remaining schemes in this current draft of the plan. Does this mean they have been dropped? The additional Park and Ride site at Clifton Moor would be very valuable in reducing the volume of traffic approaching York from this direction and providing a long overdue high quality connection for people working there coming from the city centre and beyond. The real danger from this plan is it through failing to positively plan for improving public transport. York's poor air quality, and the ill health and deaths it causes, must not be worsened by failing to plan adequate clean transport solutions for the city as the current plan appears to do.</p>	York Bus Forum

Pre-Publication Draft Local Plan (2018) summary of consultation responses

1272	Obj	<p>Para. 4.11.9 There are no clear proposals to provide bus services to serve developments. Para. 4.11.10 It is not clear what policy interventions are proposed to address the imbalance which impacts on the road network particularly at peak times. Para. 6.5.11 The Forum is concerned that limited work has been done on reducing the need to travel (SA Objective 6), except in the NE area of York. Moreover, despite the recognition that “some of the strategic policies include sites setaway from key areas of higher order service provision”, there are no specific provisions to provide bus services to these areas. Para. 6.5.26 The Forum is very concerned that three of the sites “are identified to have significant negative effects as they will likely exacerbate already congested roads (ST32 and ST36) or have limited transport options limiting accessibility using alternative modes to the car (ST26)”. Para. 6.5.27 The Forum is also concerned that “ST26, ST32 and ST36 were also identified to have potentially significant negative effects on air quality as result of transport and associated deteriorating air quality, with the latter sites also potentially negatively contributing to AQMAs.</p>	York Bus Forum
1272	Obj	<p>Para. 6.5.28 ST26 was assessed as having “a significant negative effect on SA Objective 7 (climate change) because of its location, paucity of bus routes and density of new employment space resulting in a significant number of employees likely to rely upon private car to travel to the site.” Yet despite these new road users adding to emissions and congestion, there are apparently no proposals in the Plan to address this problem. Appendix D, Section 6.1 - There are no proposals to provide better bus services to address the issue of bus services from areas of York with the highest number of households without a car to other areas of York being less well provided than from the same areas to the city centre. Appendix D, Section 6.2 - Since the publication of Local Transport Plan 3 City of York Council has made successful bids for Government funding to implement various packages of sustainable transport measures. The Forum welcomes the Government funded 'i-Travel York' programme, but this has focused mainly on the north-east sector of York and there is no indication whether it will be extended more widely. The plan does not appear to contain any evidence of the results of the programme.</p>	York Bus Forum
1272	Supp	<p>Para 4.11.9 The Forum is pleased to see the Council recognise that “Co-location of Development with sustainable transport is paramount and without policy intervention this may not be achieved, negatively affecting the City’s ambition to become a more sustainable and environmentally friendly city.”</p>	York Bus Forum

Pre-Publication Draft Local Plan (2018) summary of consultation responses

1272	Obj	Figure 1 identifies “congestion pain” caused by increased demand (traffic growth) and the need for a “high level viability assessment”. Apart from the bus symbol in this diagram, no other reference to the use of public transport to reduce demand seems to appear in the remainder of the document. Stage 2 para vi makes clear that the viability assessment will concentrate on additional infrastructure and whether this can be afforded. It ignores any attempt to reduce demand by encouraging greater use of public transport and increasing the current range and frequency of bus and park and ride services or provision of a new railway station at Haxby.	York Bus Forum
1272	Obj	One of the key requirements of the refresh was to ensure that the York Strategic Transport Model meets current WebTAG guidance. despite the stated requirements of the refresh, the consultancy work seems to have been devoted to traffic modelling based on a review of the 2016 York Traffic Model and has only been based on WebTAG Highway Assignment Modelling guidance. It is clear that the consultancy work does not address the need for the refresh, as it is much too narrowly based. much wider study is needed which: a) Takes into account the transport requirements of the proposals for housing, employment and industry developments set out in the Local Plan; b) Does not assume that demand should or could be met; c) Fully explores the potential for public transport interventions; d) Considers the wider impacts recommended by the Green Book – particularly on the environment and air quality	York Bus Forum
1355	Comm	York's future housing need must be provided with effective road and community infrastructure.	Julian Sturdy MP
1355	Obj	The York Outer Ring Road is already over capacity and views have been expressed clearly over a number of years about the need for upgrades. Proposals in the Local Plan, particularly the land west of Wigginton Road, North of Monks Cross and North of Haxby will place even greater strain on the A1237, concerns remain about the level of development north of the city.	Julian Sturdy MP
1466	Comm	The level of land allocations for employment, housing and retail/tourist development is such that there is a significant potential for increased rail usage. It would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. The safety, reliability and efficiency of the rail infrastructure are of paramount importance to Network Rail. Network Rail cannot agree to any proposals that jeopardise the safety of level crossings. Network Rail is committed to reducing the risk at level crossings where reasonably practicable and will seek to close and/or divert crossings or enhance their through the provision of improved safety features or equipment. It will encourage planning authorities to co-operate in securing level crossing closures or improvements in connection with new developments.	Network Rail

Pre-Publication Draft Local Plan (2018) summary of consultation responses

1466	Supp	Support the principles within the plan which recognise the strategic role of public transport and supports development that favours and facilitates the use of more sustainable transport. Support the principle of policies that seek improvements in rail infrastructure and would welcome the opportunity to work with the council to facilitate these.	Network Rail
1522	Obj	Set out the strategic priorities in the Core Strategy and indicate strategically important infrastructure on the key diagram plus any more detailed inset diagrams/ DfT guidance on local cycling and walking infrastructure should be referred to in the LDF. The LDF should include a policy which resists development that increases car dependent travel patterns, and which maximises developer contributions for measures that benefit cycling.	Cycling UK
1522	Comm	Supports the response submitted by York Cycle Campaign	Cycling UK
1522	Comm	Is deeply concerned that pedestrians and cyclists are not included in the transport model, and would like to see this use factored in. Numbers of motor vehicle occupants rather than the number of vehicles, should be used as a comparator against the number of cyclists who can pass through a junction in a given time. The road space occupied more efficiently by cyclists, should also be factored in.	Cycling UK
1732	obj	No provision or specific requirements included for horse riders (in relation to safety) or horse riding in the Local Plan	
2416	Obj	The problem of mobility into and around the city of each of these proposed developments must be addressed before any decision is made on their construction: producing new peripheral villages may release more land within the existing built up area but York's major access problems must not be further exacerbated.	
2846	Comm	Welcome the proposal in paragraph 1.5 for a new railway station in the Haxby area, but consider that a 'park & ride' station in open countryside on Towthorpe Road between Haxby & Strensall would serve both communities better.	
10158	Comm	The plan has ignored provisions for transport infrastructure for private vehicles.	
5599	Comm	Needs a clear and deliverable city wide strategy in Transport Topic paper to improve routes for cyclists and pedestrians in line with One Planet principles.	
5671	Comm	The typical York resident has to endure slow traffic speeds and congestion on both single and dual carriageway parts of the ring road and busy trains to Leeds and Manchester. Whilst encouraging cycling is commendable, this is not a feasible option for many residents who work outside York. sustainable, a appropriate and integrated infrastructure should be considered as part of the plan and not separately.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

5750	Comm	There would be a significant advantage for ST35, the A1237 and existing Earswick, Strensall and Stockton On the Forest residents if the Towthorpe/Malton Road junction was improved, allowing access to the A64 and beyond without using the A1237.	
6514	Comm	I recognise the need for housing in the City but I have concerns around infrastructure (particularly roads and health localities) and increased pressure further developments will bring. The dualling of the northern part of the A1237 and A64 must be at the heart of considerations and where practicable representations to relevant Public Bodies that may have influence should be made. Appreciate that CYC do not have the funding. Also I acknowledge the impending work to increase the capacities at roundabouts on the A1237 but see this as a sticking plaster to a much wider issue. Proposed developments in the north of the city (not least Queen Elizabeth Barracks, sites north of Clifton Moor, Haxby and Monks Cross) will add further pressure on local roads. It is understood that proposals may be forthcoming in the next few years with Government funding for some dualling of the A64 -this is eagerly awaited.	Cllr Paul Doughty
10520	Comm	There should be provision for a proper cycle path from Elvington to York on the B1228 - the number of cyclists has increased over the last few years and this road is not good to cycle on due to its width.	
11128	Comm	Remodelling work on roundabout junctions on A1237 should take place from Poppleton in the west to Monks Cross Link Road in the east before large developments such as ST8 & ST14 are permitted.	
11380	Comm	Elvington is in urgent need of a high quality cycle route to York, the main cycle route along the B1228 is narrow, fast and dangerous. Bridleway through Gypsy Wood to Heslington is also inadequate. Suggests four possible cycle routes: 1) Route through the airfield business park, joining with the west end of Langwith Stray or bridleway to Langwith House by travelling west of the airfield. This would also connect Wheldrake to York, most of the route is already surfaced so would only require landowner consent and a small amount of work to cross the airfield. 2) Skirting east of the airfield, joining and surfacing the bridleway at Gypsy Wood through to Langwith Stray. 3) Off-road dedicated cycle path alongside the B1228, there does seem to be room for this especially to the west side of the road. 4) Re-purpose the old railway line to joining cycle network at Dunnington and implement cyclist priority traffic light control to enable crossing of A1079.	
12284	Comm	Support the plan ensuring new development is close to public transport and cycling networks. The policies should go further to ensure developers create new footpaths and cycle networks to ensure continuity of safe passage for pedestrians and cyclists.	
12356	Obj	Objects to more house building, feeding more cars onto the A1237, without having undertake/published a traffic survey.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

12356	Obj	Objects to more house building, feeding more cars onto the A1237, without having undertaken/published a traffic survey.	
12734	Obj	Area 5: Council doesn't give consideration to the general infrastructure in this area. Don't appreciate number of extra cars on local roads with 3304 new houses. Northern Ring Road can't cope with the volume of traffic, often gridlocked - whole northern ring road is under designed (should have been dualled & flyovers when built) - problem will be much worse with new developments. Recurring problems of sewers, surface water and flooding in Haxby. Will be need for additional schools, shops, medical practices and other local amenities - will they be included in the allocation boundaries, or will they be outside the areas (making them even bigger)? People who go to work in suits & carry laptops won't cycle to work or to the shops - they'll go in cars. Unless the road network is vastly improved, there will be more gridlock, more wasted time and a vast cost to the business region.	
12765	Obj	One of the main concerns is the traffic movements and pollution / noise levels, but there is never any comprehensive strategy to combat it. The Plan states that it will make sure York residents will benefit from good and affordable transport links and consider ways of reducing the need to travel and make sure new development is located close to high quality public and transport links. However, no practical solutions are offered - in particular, what is the high quality public transport referred to, why are ST14 and ST15 on greenfield sites well away from public transport links, why is Haxby Station regarded as a long term development? The use of the railways in York should be fundamental to the Plan and there should be a 'Rail Plan' for York which would reduce road journeys, provide rail links to other centres such as Leeds, provide rail journeys for recreational purposes, provide some cross city journeys. Some new stations could be built or redeveloped. Retired railway staff could help the Council develop a rail strategy. No thought has been given to the future of railway requirements for York in the rush to turn what is not a particularly suitable area into the development dream for some members of City of York Council.	
13003	Comm	York needs to not just talk about the challenges but to ensure that there is concerted focus to see modal shift as a matter of urgency.	Rachael Maskell MP
13030	Obj	Out-Commuting – Given the level of out-commuting to the City of Leeds, there is a strong sustainability argument for focusing development in the western part of the city.	Turley representing Gallagher Estates

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13204	Comm	WYCA is the transport authority for West Yorkshire and is therefore required to produce a Local Transport Plan that covers the geography of West Yorkshire. This Transport Strategy is now being finalised for publication and launch in Autumn 2017. The policies contained in the draft Transport Strategy are however agreed and will not be changed in finalising the document for publication. The Transport Strategy sets the vision, objectives and policies to steer investment in transport infrastructure and services. The starting point is to encourage growth in locations that are most sustainable in terms of accessibility to employment opportunities and have good public transport services. The representor is	Leeds City Region Local Enterprise Partnership
13204	Supp	The representor is encouraged that the Plan for York has policies that share the types of objectives as are in the Transport Strategy. The methodology used enables the identification of a shortlist of [employment] sites in sustainable locations and has safeguarded the special character of the city and its surroundings. These locations take advantage of existing services and high levels of accessibility. This is consistent with the Transport Strategy objectives to promote sustainable accessible development, while still protecting the special historic character of York.	Leeds City Region Local Enterprise Partnership
13205	Comm	Funding from WYCA to undertake a feasibility and business case development for dualling the A1237 is very welcome. This will improve east-west connectivity across the LEP area. Also improvement for this connectivity is the Grimston Bar junction. The LEP will work with other organisations to achieve the required upgrading.	York, North Yorkshire and East Riding LEP
13213	Supp	The HCA is supportive of the approach to transport and connectivity, particularly those set out in Policies T1 (Sustainable Access) and T2 (Strategic Public Transport). York Central, as a major development providing new homes and jobs in a highly sustainable location, is critical to the success of these policies.	GVA on behalf of the Homes and Communities Agency (HCA)
13225	Comm	CYC should be proactive in dealing with the implications of increased volumes of traffic and reopening/construction of railway stations on the York/Scarborough line.	
13263	Comm	Concerned about transport, particularly the condition of roads; it's always about expansion, never basic maintenance.	
13284	Comm	Improving cycle route 66, making a separate cycle path along York Road, could encourage cycling between Dunnington and York. Cycle path intersections at the A64/A166 and A1079 roundabout need to be improved.	
13312	Comm	Please could provision be made for cyclists in all developments; routes, traffic light priority and parking.	



Pre-Publication Draft Local Plan (2018) summary of consultation responses

13338	Obj	Concern of heavy traffic in the City. Need for better cycle routes to be included in these plans. Not just the white painted lines which offer no protection, but proper separated routes. Must plan for better please.	
13340	Obj	Housing development means more traffic and that means more noise pollution from speeding cars day and night. Concern over road safety in Area 3 especially for the University of York Students.	
13344	Obj	Concern that if more houses are built that require access to the city and/or the ring road via the A59 residents will have difficulty driving both out and into their properties. The Park & Ride at the ring road has not had any real impact on the traffic levels that use the A59.	
13362	Comm	Road infrastructure needs investment to meet demand.	
13364	Obj	The plan needs to be more ambitious in regards to transport. York is an old city, cars cause pollution and traffic is at capacity in busy periods. The road layout cannot be changed but could be more innovative for example a tram system could be introduced from the inner ring road, to enable the inner ring road to be one way for cars. The city centre could be for pedestrians and bikes only and a bike hire scheme could be set up. More should be spent on the cycling infrastructure.	
13365	Comm	Pedestrianise Micklegate to create a decent shopping street on that side of the river.	
13393	comm	ST1, ST2, ST5, ST19 and E16 will all impact the A59/ Boroughbridge Road, which is an important route and is already congested at peak times. There are no plan to alleviate traffic. Action needs to be taken to stop the detrimental consequences, particularly health wise in regards to pollution.	
13399	Comm	Can a cycle path be built from Monks Cross linking up the North of Huntington? Looking at the proposed plan could a cycle path not be built from the back of Pear Tree Farm McDonalds from where the offices reach the cul-de-sac linking up with the back of Lea Way, Keith Ave, Garth Rd and North Moor. This would make walking/cycling an easier and quicker option than the long drive round via New Lane or via the already saturated By-pass and Monks Cross Drive. There has been talk of train station at Haxby / Wigginton for years, the perfect location for a park and ride type station would be in Towthorpe where the line runs alongside the Haxby to Strensall road. A station there would stop Haxby or Strensall getting clogged up with cars being parked for a future station. Also the time of a train from Towthorpe to the station would be surely under 10 minutes, compared with 30 mins+ on a bus or car.	
13428	Obj	Concern that pedestrians and cyclists are not adequately represented in the transport model.	
13429	Obj	Objects to lack of planning for walking and cycling provisions, which are the most important forms of transport due to their city wide benefits. Focuses on traffic related issues. Fails to see how plan is sustainable if walking and cycling is not accounted for.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13430	Obj	Concerned that pedestrians and cyclists are not included in the transport model. The omission of these forms of 'active transport' is likely to lead to an over estimate of the traffic problems (such as congestion).	
13453	Obj	No further development should be planned or take place until the City's transport infrastructure has been properly developed to cope with current unacceptable levels of traffic.	
13473	Comm	Little thought given to the role of cycle in planning for the future, particularly creating safer cycle routes as alternative to the car. Specifically notes Askham Bar route into the city centre, a hazardour one for cyclists but not subject to any improvement measures in the Plan.	
13478	Comm	One of York's biggest challenges is traffic congestion. Policies restrict traffic numbers generated by new development, while seeming to ignore the existing overload. The central area should be pedestrian, bound by a cycling area bound by buses and car area. The river should be considered as a transport corridor. There should be more pedestrian/cycling bridges over the rivers.	
13486	Obj	Object to the car-centric dominance of the Transport Topic Paper. Don't believe we have to make the assumption that more people will lead directly to more car journeys. Future actions can reduce car traffic by: not granting central housing car parking spaces, resurrecting past attempts to stop stop traffic on central roads, not dualing the outer ring road and providing more safe/segregated cycle paths.	
13498	Obj	Appreciate the Local Plan policies on cycling but feel there is room to improve.	
13502	Obj	Feels the paper is formed by an outdated transport model, does not mention walking and cycling and focuses only on motorised traffic. Suggests a variety of other transport models such as PTV. Criticises transport model as providing a predict and provide mentality rather than considering the transport goals of the city and working back from there. There is no consideration of cycling.	
13506	Obj	Very concerned by the fact that cyclists and pedestrians are not included in the transport model, this will lead to an over-estimate of traffic problems and an under-estimate of what can be further achieved by providing good active travel infrastructure. Wants York to be more forward looking like cities such as Oxford, Norwich and Cambridge, disappointed by the apparently unconcerned statement that congestion induced delays could increase by up to 50%. Wants to see cyclists and pedestrians included in the transport models.	
13513	Obj	Not considering train travel is a serious oversight, many tourists arrive by train and there is potential for more people to use the trains in future. York is also on several long-distance national bike routes, these provide scope for expansion of the city's 'active tourism' offer. Despite the pre-publication draft making multiple reference to the importance of sustainable development the Transport Topic Paper does not.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13513	Obj	Pre-publication draft and the Transport Topic Paper both fail to provide detail on cycle parking, including secure individual bike lockers, that will be of great importance to any successful transport network.	
13513	Comm	Section 106 and CIL monies should be used to support cycling by 1) looking at one-way streets around the city with the goal of making them two-way for people on bikes 2) installing secure on-street cycle parking such as bike hangars in residential areas where there are registered HMOs and on streets with terraces without garages.	
13520	Comm	Support a new rail station at Haxby but think it should provide a park and ride station close to Towthorpe Road on the eastern outskirts of Haxby to support new Haxby residents and those from Strensall and Towthorpe.	Strensall with Towthorpe Neighbourhood Plan Steering Group
13521	Comm	The main issue with building more houses is that infrastructure is not adjusted to meet demand. The incremental increases in housing will effect local traffic and a higher risk of accidents without improving infrastructure. Hope that incremental change is considered for any housing increase.	
13544	Comm	Believes the plan in its current form will not meet sustainable travel and health objectives. There is a disconnect between strategies and guidance to implement them, inconsistencies in the use of the word sustainable transport (either public transport or walking/cycling), and a lack of clarity and understanding on why sustainable transport should be increased and what developers need to do. Suggests including an increased significance to walking and cycling in plan, stronger policy statements to reduce reliance on car use and traffic, and stronger guidance on how to incorporate walking and cycling infrastructure into development.	York's Walk Cycle Forum

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13545	Comm	<p>Elvington village has an urgent need for a high quality cycle route to York. The B1228 is dangerous - numerous cyclists use the road daily and its an accident waiting to happen. The bridleway running through Gypsy Wood does not satisfy this need because it is still over 2 miles from the main road, is not surfaced and is not practical in the wet. There is no specific provision to extend the cycle network to Elvington although there are several opportunities to add cycle provision: a) Through Airfield Business Park, joining with west end of Langwith Stray or bridleway to Langwith House by travelling west of the airfield (ST26 &amp; ST15) - also providing a way to connect Wheldrake to York. Most of the route is surfaced, only requiring landowner consent and a small amount of work to cross the airfield: b) Skirting east of the airfield, joining and surfacing to the bridleway at Gypsy Wood to Langwith Stray; c) Off-road cycle path alongside B1228 - there does seem to be plenty of space for this, esp on the west side of the road; d) Re-use the old railway line to join cycle network at Dunnington and implement cyclist-priority traffic light control to enable crossing the A1079.</p>	
13550	Obj	<p>Concern over York's infrastructure. Alternatives to the car will not change people's behaviour. There needs to be a clean, frequent and safe public transport system that is cheap to use. If the population and housing stock increases the traffic congestion will get worse. The lag in infrastructure investment or lack of it exacerbates the problem of moving freely around the city. Concern over shared space for pedestrians and cyclists they should be separated. More use of the waterways in York should be explored.</p>	
13552	Obj	<p>Transport needs to be more prominent in the plan and consultation more detailed. Queries how can the merits of development off the A1237 be considered without firm plans for an upgrade? This is a problem for residents.</p>	
13584	Comm	<p>WYCA is the transport authority for West Yorkshire and is therefore required to produce a Local Transport Plan that covers the geography of West Yorkshire. This Transport Strategy is now being finalised for publication and launch in Autumn 2017. The policies contained in the draft Transport Strategy are however agreed and will not be changed in finalising the document for publication. The Transport Strategy sets the vision, objectives and policies to steer investment in transport infrastructure and services. The starting point is to encourage growth in locations that are most sustainable in terms of accessibility to employment opportunities and have good public transport services.</p>	West Yorkshire Combined Authority

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13584	Supp	The representor is encouraged that the Plan for York has policies that share the types of objectives as are in the Transport Strategy. The methodology used enables the identification of a shortlist of [employment] sites in sustainable locations and has safeguarded the special character of the city and its surroundings. These locations take advantage of existing services and high levels of accessibility. This is consistent with the Transport Strategy objectives to promote sustainable accessible development, while still protecting the special historic character of York.	West Yorkshire Combined Authority
13593	Comm	Disappointed by lack of emphasis on changing city centre transport away from cars towards walking, cycling and public transport. York has a relatively high proportion of journeys by bike but this is unlikely to increase above current levels without serious investment in cycling infrastructure. Aspires to European style, separated cycle lanes. Mentions that cycling into the city centre is still often dangerous and will be off-putting for many. Concerned by the omission of cyclists and pedestrians from the transport model, this should be amended as at present the model will over-estimate traffic problems. Feels that York's reputation as a cycling city thrives despite the city's infrastructure not because of it. Wants bold ideas to rethink the nature of the city we want York to be, feels opportunities around transport infrastructure, air quality and small scale energy generation are being missed.	
13593	Comm	Disappointed by lack of emphasis on changing city centre transport away from cars towards walking, cycling and public transport. York has a relatively high proportion of journeys by bike but this is unlikely to increase above current levels without serious investment in cycling infrastructure. Aspires to European style, separated cycle lanes. Mentions that cycling into the city centre is still often dangerous and will be off-putting for many. Concerned by the omission of cyclists and pedestrians from the transport model, this should be amended as at present the model will over-estimate traffic problems.	
13628	Comm	There is a repeated suggestion that railway halts will be built at Poppleton Park and Haxby yet it is not within the remit of the Local Plan or Local Authority to develop these as they are the sole responsibility of the railway authority.	Poppleton Neighbourhood Plan Committee
13628	Comm	Sustainable modes of transport - this needs to be specifically defined e.g. Cars with low emission, electric cars. What is the city's plan for buses, taxis, vans and lorries? There is only limited provision for secure sites for bicycle parking. Cycle theft in the city is exceptionally high and nowhere in the plan is there provision to remedy this situation.	Poppleton Neighbourhood Plan Committee
13628	Obj	Para 2.15. Affordable transport links. Second bullet point: the word 'safe' should be inserted between strategic and cycling. Final new bullet point should refer to Park and Ride schemes on the roads from Wigginton and Haxby to the city.	Poppleton Neighbourhood Plan Committee

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13639	Obj	The Plan lacks policies to really deal with York's air pollution and congestion issues, attempts to encourage walking, cycling and public transport have not and will not deliver sufficient improvements in air quality, public health will continue to deteriorate in the short / medium term. Low priced bus use and penalties for car use are needed.	
13600	Comm	Support the 'reference case' improvements and interventions in the Transport Implications... Document. Particularly support the proposal to construct a railway station at Haxby and propose that the reference case be extended to include the construction of a railway station at Strensall that would provide a suitable service to reduce pressure on the radial roads into York and the ring roads (inner and outer) and would help alleviate the traffic pressures that would be brought about by the proposed development at Queen Elizabeth Barracks.	
13637	Comm	Acknowledge that transport has an important role to play in contributing to the delivery and growth of sustainable communities and wider sustainability, environmental and health objectives. Policy T1 is in general conformity with transport policies of the NPPF but could be expanded to set out that on completion of developers obligations to ensure provision of a high quality public transport system, the developer will be required to provide details of how this service will be continued to ensure sustainability. CPRENY are supportive of the schemes and policies in the Plan but question the ability of CYC alongside its partners ability to deliver the required transport infrastructure to ensure the sustainable objectives are indeed met.	CPRE - North Yorkshire
71	Comm	There is a repeated suggestion that railway halts will be built at Poppleton Park and Haxby yet it is not within the remit of the Local Plan or Local Authority to develop these as they are the sole responsibility of the railway authority.	Poppleton Neighbourhood Plan Committee
71	Comm	Sustainable modes of transport - this needs to be specifically defined e.g. Cars with low emission, electric cars. What is the city's plan for buses, taxis, vans and lorries? There is only limited provision for secure sites for bicycle parking. Cycle theft in the city is exceptionally high and nowhere in the plan is there provision to remedy this situation.	Poppleton Neighbourhood Plan Committee
71	Obj	Para 2.15. Affordable transport links. Second bullet point: the word 'safe' should be inserted between strategic and cycling. Final new bullet point should refer to Park and Ride schemes on the roads from Wigginton and Haxby to the city.	Poppleton Neighbourhood Plan Committee

<b>Communications Infrastructure</b>			
13204	Obj	SEP Priority 4 'Infrastructure for Growth' aims to build a 21st century physical and digital infrastructure that supports the City Region to grow and compete globally. This includes digital infrastructure, within which broadband delivery is key priority. The plan policies could strengthen the commitment to delivering better digital infrastructure which would support the SEP priorities. This could include requirements on ducting or connection standards for new builds or minimum requirements in recognised economic growth areas.	Leeds City Region Local Enterprise Partnership
13584	Obj	SEP Priority 4 'Infrastructure for Growth' aims to build a 21st century physical and digital infrastructure that supports the City Region to grow and compete globally. This includes digital infrastructure, within which broadband delivery is key priority. The plan policies could strengthen the commitment to delivering better digital infrastructure which would support the SEP priorities. This could include requirements on ducting or connection standards for new builds or minimum requirements in recognised economic growth areas.	West Yorkshire Combined Authority

Infrastructure Delivery Plan/Viability			
7	Comm	The Local Plan has been subject to viability testing and the proposed allocations have been selected through a robust assessment process. The level of assessment that has been undertaken to confirm the viability and deliverability of the allocated sites is unclear. This is crucial to demonstrate that the Plan is sound. Ensuring that all sites are deliverable is essential for neighbouring authorities, that may be put under pressure if development does not come forward, especially in those settlements that offer good accessibility to York.	Hambleton District Council
7	Comm	The Local Plan has been subject to viability testing and the proposed allocations have been selected through a robust assessment process. The level of assessment that has been undertaken to confirm the viability and deliverability of the allocated sites is unclear. This is crucial to demonstrate that the Plan is sound.	Hambleton District Council
198	Comm	Recognise and endorse the need to provide appropriate social and community infrastructure. However in order that the Local Plan is sufficiently robust it is necessary that the Council updates its Infrastructure Development Plan (the most recent being published in 2013) as part of the next stage of consultation. This is vital in ensuring that sufficient land is available to provide new facilities where they are required and that the impacts of these facilities are fully taken into account as part of the plan-making process. The same principle applies to Policy EC6.	National Railway Museum
1675	Comm	The potential for a CIL does not feature in the Local Plan and from the PBA Report, it is unclear as to which of these policies [PBA report Table 3.1] would fall within the remit of a CIL should the Council decide on that route.	Johnson Mowat representing Taylor Woodrow
1675	Comm	The response is an 'interim' response on the topic of 'viability' insofar as it relates to Site ST7 (and any overlap with site ST8) and the implications of the policy requirements of the Plan and the potential for a CIL. The Council's supporting September 2017 Viability and CIL document produced by Peter Brett Associates (PBA) is helpful but equally inconclusive on many critical matters. The suggestion of a CIL rate of £150/sq.m is far higher than other northern cities and will take some defending. While PBA's use of BCIS 'Median Values' is supported as being appropriate for York, it is noted the Q3 2015 build costs costs are being justified by PBA on the basis that they are more certain than more recent BCIS estimates. The September 2017 BCIS costs are 14% higher than the Q3 2015 figures used by PBA and while we accept these are estimates, the scale of the increase in build costs over these last 2 years is not a matter than can be overlooked and we expect this to be addressed in future updates and reviews.	Johnson Mowat representing Taylor Woodrow



Pre-Publication Draft Local Plan (2018) summary of consultation responses

1675	Comm	The Greenfield Site costs are accepted as being very general and will need to be considered on a site by site basis. In the case of ST7, the Council's desire to have the development divorced from the urban area and highway network will impact significantly on costs. The £3,300 S106 'cost' for each of the 845 dwellings on ST7 would generate a total S106 pot of circa £2.8M which will not deliver; the Primary School on-site, community facilities on site, support to a new High School off-site, public transport improvements and strategic highway upgrades. Indeed, the £2.8M would provide nothing beyond a single form entry Primary School.	Johnson Mowat representing Taylor Woodrow
1675	comm	The table refers to developer contributions. While the text to support Policy DM1 makes an attempt to draw these together, it must be acknowledged they are all potentially making demands of development on matter that in the main would be covered by a CIL. The viability work currently being undertaken by CYC needs to be vigorously tested working with the development industry. Para 173 of the Framework requires robust viability testing of Plans such that policies do not. Text from Para 173 regarding reasonable returns to landowner and developer need to be added.	Johnson Mowat on behalf of Taylor Wimpey
1676	Comm	The potential for a CIL does not feature in the Local Plan and from the PBA Report, it is unclear as to which of these policies [PBA report Table 3.1] would fall within the remit of a CIL should the Council decide on that route.	Johnson Mowat representing Redrow
1676	Comm	The response is an 'interim' response on the topic of 'viability' insofar as it relates to Site ST8 (and any overlap with site ST7) and the implications of the policy requirements of the Plan and the potential for a CIL. The Council's supporting September 2017 Viability and CIL document produced by Peter Brett Associates (PBA) is helpful but equally inconclusive on many critical matters. The suggestion of a CIL rate of £150/sq.m is far higher than other northern cities and will take some defending. While PBA's use of BCIS 'Median Values' is supported as being appropriate for York, it is noted the Q3 2015 build costs costs are being justified by PBA on the basis that they are more certain than more recent BCIS estimates. The September 2017 BCIS costs are 14% higher than the Q3 2015 figures used by PBA and while we accept these are estimates, the scale of the increase in build costs over these last 2 years is not a matter than can be overlooked and we expect this to be addressed in future updates and reviews.	Johnson Mowat representing Redrow

Pre-Publication Draft Local Plan (2018) summary of consultation responses

1676	Comm	The Greenfield Site costs are accepted as being very general and will need to be considered on a site by site basis. In the case of ST8, the combined water attenuation and nature reserve east of Monks Cross Link will require a cost appraisal. The £3,300 S106 'cost' for each of the 968 dwellings on ST8 would generate a total S106 pot of circa £3.2M which will not deliver; the Primary School on-site, community facilities on site, support to a new High School off-site, public transport improvements and strategic highway upgrades. Indeed, the £3.2M would provide nothing beyond a single form entry Primary School.	Johnson Mowat representing Taylor Woodrow
12659	Comm	Policies HW1-HW5 and Policy ED6 are not supported by an up to date evidence in the form of an Infrastructure Delivery Plan (IDP). An update would allow for developer certainty and clarity for where there are up to date assessments of deficits or identified need for specific levels of infrastructure and where there was a need to address this provision onsite. It would also allow for coordination of strategic delivery of infrastructure, the creation of standard formulas and consistent outcomes across the city.	Arup on behalf of the York Central Partnership
12659	Comm	Supportive of the intent of the Local Plan to deliver a mix of housing, there remains concern that the significant demands imposed on strategic sites by policies H4,H5, H10 may negatively affect the overall viability and deliverability of development.	Arup on behalf of the York Central Partnership
13106	Comm	There are multiple policies in this draft Local Plan seeking 'Developer Contributions'. It remains unclear as to how these overlap with the CIL and the suggestion that sites are viable as currently assessed by the Council	Johnson Mowat obo landowner
13106	Comm	There are multiple policies in this draft Local Plan seeking 'Developer Contributions'. It remains unclear as to how these overlap with the CIL and the suggestion that sites are viable as currently assessed by the Council	Johnson Mowat obo landowner
434	Obj	Considerable concerns in relation to the Viability Assessment evidence base document. In particular it is noted that Paragraph 5.2.9 and associated table 5.2 in the document makes reference to the British Sugar site as one of the strategic sites being tested using site specific information. No details of this site specific information are provided within the document. For this reason unable to accept or confirm any of the inputs or assumptions that may have been used in the cited site specific assessment. Do not accept that the document provides a correct approach to valuation of the site as Peter Brett Associates opinion of the value is incorrect. Based on detailed knowledge of the site the conclusions and viability results shown in respect of the British Sugar site are not correct.	Rapleys LLP on behalf of British Sugar PLC
1675	Obj	The Local Plan lacks clarity on developer contributions and the role of the CIL.	Johnson Mowat representing Taylor Woodrow

Pre-Publication Draft Local Plan (2018) summary of consultation responses

1675	Obj	<p>Table 3.1 would be improved through the addition of a column to inform which policy item would fall within the scope of the CIL. With regard to benchmark land value Johnson Mowatt do not agree that the strategic sites can be delivered on a land value any different to that stated for urban and sub-urban sites. The developer requests professional fees be assumed at 10% with suggested 5% for contingency on sites of over 500 dwellings. All major house builders operate on a 20% return on both market and affordable housing. The 6% return on affordable housing referenced by PBA is not accepted as a reasonable approach. The developer normally works at 7% finance cost. The Representor does not agree that the strategic sites can be delivered on a land value any different to that stated for urban and sub-urban sites. The strategic sites are essentially sub-urban sites albeit the Council has chosen to divorce them from the urban area making them more expensive to deliver through higher services costs and higher access road costs. The text in Paragraph 5.4.2 needs to understand and explain what is expected of sites such as ST7.</p>	Johnson Mowat representing Taylor Woodrow
1675	Obj	<p>Affordable housing set at 25% would be a more appropriate limit on strategic sites such that more investment can be made into social infrastructure.</p>	Johnson Mowat representing Taylor Woodrow
1676	Obj	<p>The Local Plan lacks clarity on developer contributions and the role of the CIL.</p>	Johnson Mowat representing Redrow
1676	Obj	<p>Table 3.1 would be improved through the addition of a column to inform which policy item would fall within the scope of the CIL. With regard to benchmark land value Johnson Mowatt do not agree that the strategic sites can be delivered on a land value any different to that stated for urban and sub-urban sites. The developer requests 5% for contingency is used. All major house builders operate on a 20% return on both market and affordable housing. The Representor does not agree that the strategic sites can be delivered on a land value any different to that stated for urban and sub-urban sites. The strategic sites are essentially sub-urban sites albeit the Council has chosen to divorce them from the urban area making them more expensive to deliver through higher services costs and higher access road costs. The text in Paragraph 5.4.2 needs to understand and explain what is expected of sites such as ST8 and its overlap with ST7 . Affordable housing set at 25% would be a more appropriate limit on strategic sites such that more investment can be made into social infrastructure.</p>	Johnson Mowat representing Redrow

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13204	Obj	The representor notes that at this stage the sites and policies are not supported by an up to date Infrastructure Delivery Plan (IDP) which would be expected to provide the details of infrastructure projects and funding sources required to deliver the Plan. In order to assess if the Plan is in line with the SEP an up to date IDP will also be required to demonstrate the Plan is delivering objectives for wider coverage of physical, social and green infrastructure.	Leeds City Region Local Enterprise Partnership
13213	Obj	In order that the Local Plan is sufficiently robust, it is necessary that CYC updates its Infrastructure Development Plan (the most recent being published in 2013) as part of the next stage of consultation. This is vital in ensuring that sufficient land is available to provide new facilities where they are required and that the impacts of these facilities are fully taken into account as part of the plan-making process. The same principle applies to Policy EC6 (Pre-School, Primary and Secondary Education) also.	GVA on behalf of the Homes and Communities Agency (HCA)
13584	Obj	The representor notes that at this stage the sites and policies are not supported by an up to date Infrastructure Delivery Plan (IDP) which would be expected to provide the details of infrastructure projects and funding sources required to deliver the Plan. In order to assess if the Plan is in line with the SEP an up to date IDP will also be required to demonstrate the Plan is delivering objectives for wider coverage of physical, social and green infrastructure.	West Yorkshire Combined Authority
1675	Supp	Support the 10% uplift for services (external costs) and accept the land purchase costs	Johnson Mowat representing Taylor Woodrow
1676	Supp	Support the 10% uplift for services (external costs) and 8% for professional fees Also accept the land purchase cost and 6.5% figure for finance for now although interest rates are due to increase in coming years.	Johnson Mowat representing Redrow

Pre-Publication Draft Local Plan (2018) summary of consultation responses

<b>Residential Amenity</b>			
13025	Comm	The Plan should more adequately address concerns of local residents in terms of impact that any piecemeal approach to construction of a development may bring.	Integrated Built Environment Ltd
13213	Comm	The HCA is concerned by the level of information that developers are being asked to provide to support planning applications by these policies [HW1 to HW7 and ED6]. It appears disproportionate and may deter or delay successful development from coming forward. Further clarity is required as to the scope of such documents with particular reference to paragraph 46 of the Planning Practice Guidance.	GVA on behalf of the Homes and Communities Agency (HCA)
13639	Obj	Areas of high deprivation are noted but there is no serious attempt to address these with community based solutions.	
1733	supp	Support for provision of leisure and nursery provision as a result of development in the local plan	
13213	Supp	The HCA supports the intent of Policies HW1 to HW7	GVA on behalf of the Homes and Communities Agency (HCA)

Pre-Publication Draft Local Plan (2018) summary of consultation responses

Healthcare			
80	Comm	The existing healthcare (doctor and dentist) provision in Haxby and Wigginton is nearing capacity. Additional facilities will be needed if extra housing is developed.	Wigginton Parish Council
13213	Comm	The HCA is concerned by the level of information that developers are being asked to provide to support planning applications by these policies [HW1 to HW7 and ED6]. It appears disproportionate and may deter or delay successful development from coming forward. Further clarity is required as to the scope of such documents with particular reference to paragraph 46 of the Planning Practice Guidance.	GVA on behalf of the Homes and Communities Agency (HCA)
13627	Comm	Instead of closing care homes utilise the current.	
13639	Obj	Provision of mental health care in York has been severely limited for many years, major investment is needed in facilities and health care workers. Privatisation of York Hospital should be resisted and reversed with increased funding for staff and amenities.	
13639	Obj	The plan pays lip service to tackling the issue of homelessness but there is no detail or solutions offered as to how matters can be helped.	
13213	Supp	The HCA supports the intent of Policies HW1 to HW7	GVA on behalf of the Homes and Communities Agency (HCA)

Pre-Publication Draft Local Plan (2018) summary of consultation responses

General area based comment (non site specific)			
9	Comm	Area 3. The proximity of the strategic development sites at Elvington and Wheldrake to the Lower Derwent Valley - one of the largest and most important examples of traditionally managed species-rich habitats remaining in the UK - is noted. Selby District Council expects the ongoing joint working between Selby District Council, CYC, East Riding Council and North Yorkshire County Council to establish an agreed cross boundary approach to the area's protection and management, which is being progressed by East Riding Council as an SPD, to continue as the plan is progressed. Any development which increases the floor space and/or attractiveness of the Designer Outlet Centre must rigorously consider the potential strategic impact on Selby Town (as a Principal Town as defined in the adopted Core Strategy).	Selby District Council
45	Comm	Would like to see the New Earswick principles applied to the Garden Village and the two new village settlements. For example, buildings should take account of natural features, streets should be lined with trees, streets should not 'wander aimlessly' and take advantage of natural views, building lines do not need to adhere to street alignment and building in blocks of four with a central rear access tunnel providing views, gardens secluded from street. No house should face northwards (light), two sides of house should have open air space to it, every house should have a garden. Should include a green that serves as a playing field as a central feature of village. Rents should be fixed and affordable for the working classes. 12 dwellings per acre.	YEF
778	Comm	Support for the plan but queries whether doctors, shops and dentists etc have been considered.	
1732	Comm	Land at York Riding School. In preparing a local plan, the authority should take into account the needs of land based businesses, sports venues and areas for recreation. Planning policies should protect and enhance public rights of way and access. Opportunities should be sought to provide better facilities for users, for example by adding links to existing rights of way networks. Providing a green wedge in our location is of little value if there is no means of public access to it whatsoever. Riding School requires a large land area - we note that the Plan shows the proposed route of a new carriageway to widen the A1237, which necessitates the acquisition of part of the Riding School's land. Also notes that land stretches to A12367 and track access coloured red - is it being considered as a cycleway and, if so, it should also be accessible to horse riders.	The York Riding School

Pre-Publication Draft Local Plan (2018) summary of consultation responses

1901	Comm	North of the City/northern ring road. Concerned that developed is concentrated in an area to the north of the city, impactful on A1237. Notes sites ST14/ST8/ST9. At the current time, traffic trying to get onto the A1237 at the A19 roundabout queues past Skelton and some 3 miles to Shipton-by-Beningbrough. The A1237 needs upgrading before large housing estates are planned in its vicinity. Recent in-depth traffic modelling still appears to be unviable - notes the following statement: <i>"The Council is aware that further work may be required to identify additional transport ... infrastructure to lessen the impact of development, taking into account whether...it does not impose such a burden as to render the Local Plan unviable."</i> This statement suggests that having a local plan for York's future takes priority over the current needs of York's residents.	
2655	Comm	Would like to see a real commitment to affordable housing and some provision of open space for public use, preferably on the fmr Manor School site, in an area of the city with very little existing provision.	
4817	Comm	Area 5. Please scrap development plans for Strensall and Wigginton.	
9432	Comm	Concerned over impact of traffic on ring road.	
9832	Comm	(Elvington) Plan has few references to infrastructure. B1228 is already busy with many heavy goods vehicles. Alternative routes should be installed for ST15. Should be restriction on HGVs through village.	
10055	Comm	As a general comment it seems potential sites within the York Outer parliamentary constituency are easily removed from the draft Local Plan but sites within the York Central area are always the first to be kept in. Is there political bias? Is this a fair and objective process?	Hull Road Ward Councillor
10154	Comm	Proposed sites ST1, ST2 and ST14 in the north and north west of the city will bring extra congestion to the A1237 ring road and the Clifton Moor and Wigginton Road roundabouts. The plan should schedule traffic capacity improvements in advance of the housing construction. Data of school space planning should be included in plan due to lack of capacity near these sites.	
10246	Comm	(Elvington) Strongly support comments made by Elvington Parish Council, including the issue with the narrow bridge over to Sutton upon Derwent, which has had several major crashes on and be closed for repairs. Due to the possibility of more industrial units there will be more large vehicles driving over making it more dangerous - they should be redirected via Dauby Lane to Hull Road.	
13229	Comm	Area 1. Any proposed developments need to consider and fully exploit all brownfield sites prior to developing green belt. Due consideration must be paid to York's already overcrowded road network/infrastructure and how development would address this inc cycle paths. All new builds need to utilise green technologies.	



Pre-Publication Draft Local Plan (2018) summary of consultation responses

13248	Comm	Area 5. Build sufficient university accommodation for York St John students (all 3 years) so that the permanent residents of The Groves can be spared the constant noise, partying and drunkenness that blights their lives.	
13267	Comm	Area 1 / Area 2 / Area 5. Will cycle routes be provided to connect new housing areas into the City Centre?	
13325	Comm	ST1/ST2/ST5. Comment notes the potential for new road infrastructure through ST2/ST1 and following rail lines to ST5, and further notes potential for a rail link from A59 P+R joining the Poppleton line into York. Housing/business to follow the route of the new transport systems.	
13354	Comm	Area 1 - impact of ST1/ST2 and ST14 on ring road congestion. Provision needs to be made to increase the capacity of the ring road.	
13393	Comm	Area 1 - housing planned for ST1, St2, St5 totals approx 3,000 homes (with many having more than one car). Employment space on ST5, ST19 and E16 amount to about 120,000 sq m for businesses. All these proposed development will potentially impact upon traffic demands on A59/Boroughbridge Road, an important route into and out of York that is already congested at peak times with no plans to alleviate additional traffic from the proposed developments. This is incredibly irresponsible as all necessary infrastructure to support such expansion must be determined prior to development. Proposals should be reconsidered and attention to traffic impact on the A59 reviewed whilst reducing the capacities on all sites. Unless adequate steps are taken to alleviate the adverse affects. Pollution and resulting health issues along with traffic congestion all need to be taken into account.	
13521	Comm	In relation to Area 5 and the housing planned for Haxby/ Strensall, strongly recommend considering the incremental increases in traffic from more housing particularly with use of Usher Lane to Strensall (ST9) and the projected increase in train services over the level crossing to and from Scarborough. which will back up traffic off the ring road and will affect ST9 and ST35.	
13538	Comm	Area 1: Planned housing for ST1, ST2 & ST5 - roughly 3000 homes in total and many will have two cars. Approx 120,000sqm is proposed for businesses. Huge concern that these proposed developments are going to have a massive impact on the demand of traffic on the A59. The A59 is a vital route in & out of the City and has massive congestion problems especially at peak times - and there does not appear to be any plans to alleviate these issues through the proposed developments. CYC Planning department has not looked at this closely enough. This is unacceptable and this should be reassessed. The number of dwellings should be reduced. Traffic flow on the A59 will have a detrimental effect on the residents of Boroughbridge Road, increased pollution levels and gridlock. How does the Council envisage these problems being overcome?	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13626	Comm	<p>See the plan as an important step towards managing the development of the city centre and surrounding villages. Would like to point out that the road from Copmanthorpe to Colton (Colton Lane leading to Hagg Lane) is a roman road, leading from York to Tadcaster. The hedgerows, specifically those on the north side have been identified as dating back approximately a thousand years. A Roman Road with such an age would surely meet a minimum of local conservation status. Would also like to highlight severe drainage problems, encloses a photo of a waterlogged field opposite Manor Heath, that is very close to their house. Concerned that disturbance to the permeable land or subsoil in the locality will negatively impact the very important drainage function that this field provides. Any disturbance could compromise the houses standing on Manor Heath and behind, in College Road. There was additional drainage provided when the existing houses on the Manor Heath / College Road estate were built but having silted up over the course of years this is now failing as the photo clearly demonstrates. Additionally, in the winter months a body of water collects on the low lying land of the proposed development. As York floods regularly we should be more conscious of the very important function certain fields and areas play in draining away rainwater.</p>	
62	Obj	<p>Area 3. Concerned about the undue concentration of major development proposals in the south-east quadrant of the city, affecting Fulford and Heslington. The area has already been significantly impacted by the development of the University East Campus and the start of the Germany Beck development (650 dwellings) along with the continuing incremental expansion of the retail and leisure offer at the York Designer Outlet. The PPD is now proposing further major developments in this part of the City at ST4: Hull Road (211 dwellings), ST15: West of Elvington Lane (3339 dwellings), ST36 Imphal Barracks (769 dwellings), ST27 University of York Expansion (21,500 sqm of B1 employment floorspace) and H56 Land adjacent to Hull Road (70 dwellings). These proposals (and their associated transport and other infrastructure) would have a major adverse impact upon the character of the area and the living conditions of existing residents. There would not only be a significant loss of open land and visual outlook but significantly increased traffic congestion, traffic noise, air pollution and community severance. In regards to the Fulford Conservation Area the plan in its current form does not comply with the NPPF imperative for local planning authorities to recognise that heritage assets are "an irreplaceable resource" and that they should "conserve them in a manner appropriate to their significance".</p>	Fulford Parish Council
63	Obj	<p>Area 5. Haxby is already over-developed. There are serious parking issues, the schools are full and GPs overstretched. The uneven distribution of development is striking.</p>	Haxby Town Council
430	Obj	<p>Area of open space adjacent to Poppletongate House, Millgates, YO25 6AX has not been included.</p>	
1139	Obj	<p>Area 3. Wrong to consider any further building in Elvington before consideration has been given to the impact on public services. School and doctors surgery at capacity. Whole plan should be re-thought.</p>	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

3256	Obj	Area 5. (North) Believes proposed developments in the northern quadrant of outer York to be excessive and concentrated in comparison to the east, west and south. Feels the other areas have better road and rail networks and better sources of employment (Leeds).	
3428	Obj	Adjacent Local Authorities have proposed plans for significant developments to many villages north and north-west of York. These sites will also have a major impact on York as they are served by the A59, A19 and B1363 which feed into the A1237.	Skelton Village Action Group
3520	Obj	Area 1. Objects to the impact of development on the following grounds: green belt being impinged; traffic infrastructure already at capacity; services and amenities at capacity (schools/utilities/healthcare); parking overstretched; innumerable brownfield alternatives.	
3520	Obj	Area 5. Objects to the impact of development on the following grounds: green belt being impinged; traffic infrastructure already at capacity; services and amenities at capacity (schools/utilities/healthcare); parking overstretched; innumerable brownfield alternatives.	
4379	Obj	A1237 to the north of York is already beyond capacity so any development will exacerbate existing gridlock. The plan seems contradictory: it rightly notes that the junction of Usher Lane and Station Road is already dangerous especially given its proximity to a primary school, but then proposes a development nearby which will only make the junction more dangerous. The treeline along Crooklands Lane should be protected with tree preservation orders. The latest speed calming installation on Usher Lane has made no impact, access from ST9 to Usher Lane should be for bikes at the most. Haxby's infrastructure cannot cope with the current population, for instance the health centre is not providing a good service and struggling to recruit doctors.	
5674	Obj	Area 5 - all sites. Concern over infrastructure and sewerage system. 'Our City' special edition states that the Local Plan will make sure that new development is close to high quality public transport and cycling networks, where is the cycle network? It is not enough to say that you'll consider building a cycle path on Strensall Road after the housing has been built. Public Transport is reducing in frequency and is not reliable - it is not routed to serve 578 houses. Concern over the queues onto the ring road which often starts at Queen Elizabeth Barracks on the morning rush hour. There is almost no allocation for employment in this area. The sewage system is at capacity. The Barracks is currently served by a private sewer system which is to be closed. Where will the sewerage go from ST35, H59 and ST9?	
5796	Obj	Objects to housing sites in area 5 (presumably Our City) as the A1237 northern ring road cannot deal with additional traffic. Says that the estimated cost of upgrading / dualling the ring road is likely to be so high that making developers pay for upgrades will render their sites unviable. States upgrades should be made before any construction begins.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

5796	Obj	Objects to housing sites in area 1 (presumably Our City) as the A1237 northern ring road cannot deal with additional traffic. Says that the estimated cost of upgrading / dualling the ring road is likely to be so high that making developers pay for upgrades will render their sites unviable. States upgrades should be made before any construction begins.	
6735	Obj	Area 5. No thought is being given to infrastructure - at the moment the Strensall, Haxby and Wigginton roundabouts on the A1237 are totally gridlocked during the am/pm rush hour. With the addition of 1,852 homes this will be chaos.	
6873	Obj	Unable to support these proposals without evidence of upgrades to existing support infrastructure. Mainly the upgrade of the road system including the Outer Ring Road and facilities for non-vehicle users. The Outer Ring Road must be dualled before any extra housing is provided. This should be a condition within the proposals.	
7902	Obj	Northern ring road. Impact of potentially 4596 homes on to the north of York feeding onto the A1237 - could equate to a possible further 9000 cars as there are no jobs this side of the City. Please listen to residents and don't ruin this beautiful city and its surrounding areas.	
10018	Obj	North of York. Stop building to the north of York; we are bearing the brunt of development in the city.	
10888	Obj	Is objecting to both H39 and ST15 in this single response, is opposed due to the same reasons listed in their other responses. (Goes into detail on their reasons for opposing development: it would overwhelm local infrastructure (sewage, water, electricity, roads, flood defences, broadband), the loss of the airfield, the fact that Elvington has already accommodated new housing in recent years, the impact it would have on the already congested A64, schools do not have the capacity and nothing has changed since previous planning rejections.)	
12252	Obj	(Area 1) Amount of proposed building for ST5 and ST1 will be detrimental to existing roads and neighbourhoods. ST5 should be used for green space as little allocated. Only significantly sized green space in Salisbury Road area is threatened by a proposed route into ST5. Will be a loss to area. Objects to amount of employment space in ST5 when there are empty office in town.	
12515	Obj	Objects to traffic increase on B road, which will not cope. Lorries are in breach of noise and safety levels. Lack of infrastructure plans.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

12765	Obj	The group behind the Copmanthorpe Neighbourhood Plan was determined to overturn the original scheme to provide additional housing on the land west of Manor Heath and Wilstrop Farm Estate (ST12, H40 & ST31). Revised Government housing figures 'conveniently' reduced the need for these sites, and revised allocations were proposed away from these sites. Manor Heath / Wilstrop Farm sites are not inappropriate sites, having good access etc. The opposition to these sites has not been based on the best interests of the village, but for the benefit of those who don't want to relinquish the status quo. This approach of 'Pull up the ladder Jack, I'm ok' is a sad reflection of the prevailing attitude. The density of the housing proposed for Moor Lane is inappropriate for the edge of a village at 33.2 dwellings per hectare creating a ghetto with only one access route (where as ST31 has density of 19.5 dwellings per hectare suggesting that the poorer / densely populated developments will be kept away from the nicer parts of the village). Also, if H29 is developed there will be less opportunity for a station at Copmanthorpe.	
13003	Obj	Acomb Park should be designated as land for a new park development.	Rachael Maskell MP
13166	Obj	Accept the need for new housing in York but concerned over the number of houses on ST9 and the effect on it of the nearby sites of ST14, ST35 and H59 (2706 new houses in total). It is felt that there are too many houses for the community, retail and business facilities in the centre of Haxby. If any additional development at all should be undertaken it should cover a smaller area and include a much smaller number of houses.	Cllr I. Cuthbertson - Haxby and Wigginton Liberal Democrats.
13235	Obj	Area 5 - objects to development in this area on the following grounds: overstretched GPs surgeries and schools; change in character of the village; impact on open countryside.	
13237	Obj	Areas 3 and 4. Local schools, both primary and secondary, are at capacity. Development must be accompanied by suitable infrastructure in terms of primary and secondary education.	
13265	Obj	Area 1. Until the northern ring road has been dualled (made fit for purpose) there should be no further development to the north or adjacent.	
13265	Obj	Area 5. Until the northern ring road has been dualled (made fit for purpose) there should be no further development to the north or adjacent.	
13273	Obj	Plan adds approx 5,000 homes north of York - objects to the significant impact on congestion on the outer ring road. Where is the infrastructure plan to accommodate this level of development?	
13281	Obj	Area 1. Until the northern ring road has been dualled (made fit for purpose) there should be no further development to the north or adjacent.	
13281	Obj	Area 5. Until the northern ring road has been dualled (made fit for purpose) there should be no further development to the north or adjacent.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13300	Obj	Area 1. Until the northern ring road has been dualled (made fit for purpose) there should be no further development to the north or adjacent.	
13393	Obj	ST1, ST2, ST5, ST19 and E16 will all impact the A59/ Boroughbridge Road, which is an important route and is already congested at peak times. There are no plan to alleviate traffic. Action needs to be taken to stop the detrimental consequences, particularly health wise in regards to pollution. Playing fields must be preserved as a green open space for the community and air quality.	
13411	Obj	Suggest that an evidence base study is undertaken of the economic and other benefits of the best and most versatile agricultural land within the district. The analysis undertaken in the 2014 SHLAA does not adequately address this matter.	Pilcher Homes Ltd
13422	Obj	Concern for Haxby and Strensall on the following grounds: 1. the resources and infrastructure are not available, schools are not big enough, GP practices are not big enough, roads are already congested. Totally against any further housing.	
13440	Obj	Area 1: Increase in housing where already overcrowded road system is a concern - especially on the A1237, where the extra traffic pressures from ST1+2 and ST14 will create extra pressure. Skelton is used as a cut through.	
13474	Obj	The infrastructure of Haxby and Wigginton is already at full capacity in areas such as the doctors surgery, foul and surface water sewers, Haxby town centre parking and congestion of the North York ring road. These matters should be addressed before any further development takes place. Although a Haxby rail station is welcomed it is suggested that a cycle route for Haxby / Wigginton would be of far greater benefit. The existing facility is intermittent and routinely parked over and therefore dangerous.	
13474	Obj	States that the infrastructure of Haxby and Wigginton is already at full capacity in areas such as the doctors surgery, foul and surface water sewers, Haxby town centre parking and congestion on North York ring road. These matters should be dealt with before further development takes place. Welcomes the proposed train station for Haxby but says that a dedicated cycle route for Haxby / Wigginton into York city centre would be of far greater benefit as the current facility is often parked over and dangerous for cyclists.	
13665	Obj	Area 1. this area already suffers from a lot of traffic congestion, made worse since changes to ring road roundabouts. Concerned the Council won't take a holistic view, more opportunistic.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

NDM4	Obj	Area 1: Concerned about the overall number of dwellings proposed for the area along the A59 and between the A59 and B1224, to the west of York which also includes York Central. This would amount to approx 3000 dwellings. This does not include the additional 3000 dwellings proposed by Harrogate Borough Council at Cattal. These would potentially affect traffic around the west side of York. Not everyone wants to travel by train as these are very expensive.	
268	Supp	Areas 3, 4 and 5. Housing has to go somewhere, however the Plan is short on detail re road, rail and transport infrastructure.	
509	Supp	This is a sympathetic plan that addresses all the key concerns while protecting the environment and character of the area. The plan is commended.	
778	Supp	Support for the plan.	
1256	Supp	Area 5. Haxby station should be reopened.	
12515	Supp	Supports limited mixed housing, keeping airfield for its current purpose, restricting HGVs through Elvington village, finding alternative sites for houses closer to Grimston Bar.	
13295	Supp	Supports plan for Huntington.	
13339	Supp	Support for the development in and around Rufforth. Understands / appreciates the need for housing and thinks the plan is well thought out.	
13624	Supp	Supports all sites in area 2.	
13466	Supp	Supports designation of open space adjacent to Heslington Tillmire that will be managed as a conservation site. Noted that site is not listed under site references so hoped that it is considered a significant part of the plan.	

<b>Safeguarded Land (non site specific)</b>			
1668	comm	Local Plan is silent on issue of safeguarded land. NPPF clear that this can be designated for longer term. The greater amount of safeguarded land, the greater green belt permanence.	PB PLanning on behalf of Barratt and David Wilson Homes
13026	comm	Local Plan is silent on issue of safeguarded land. NPPF clear that this can be designated for longer term. The greater amount of safeguarded land, the greater green belt permanence.	
13027	comm	Local Plan is silent on issue of safeguarded land. NPPF clear that this can be designated for longer term. The greater amount of safeguarded land, the greater green belt permanence.	PB Planning on behalf of David Wilson Homes.
1352	obj	The plan should allocate safeguarded land in the plan to ensure the green belt boundaries endure beyond the plan period and avoid the need for a future review. This is entirely appropriate and in conformity with national guidance. Particularly important where deliverability of sites is uncertain die to issues of land ownership, viability and no known developer interest.	Lichfields on behalf of Wakeford Properties
1498	obj	The plan should allocate safeguarded land in the plan to ensure the green belt boundaries endure beyond the plan period to avoid the plan being found unsound; lack of identification would be a serious failure of the plan. Identification of sites is entirely appropriate and in conformity with national guidance. Particularly important where deliverability of sites is uncertain due to issues of land ownership, viability and no known developer interest. Furthermore, reserve sites ensure housing needs are met should sites not come forward as planned. Also not clear what the Council's response is should sites be brought forward by developers quicker. Land should only be released within the plan period if persistent under-delivery.	Lichfields on behalf of Bellway Homes
1675	obj	The housing allocations only partly extend beyond 2033 and delivery significantly tails off to 2038. Given no safeguarded land, the plan fails to justify the end date with allocations as presented in the trajectory. Given that it is likely the OAHN needs to be higher and that there is uncertainty in relation to the delivery of certain strategic sites, safeguarded land is required for flexibility to give the new Green Belt any degree of permanence. Given the Plan contains no Safeguarded Land and is overly tight in the provision such that it contains no flexibility in the event of a delivery failure, the Plan contains no review mechanism. In other words, it lacks any Plan B options should Plan A fail. It is therefore unsound in that the option chosen with no flexibility and overlooking key parts of the OAN evidence base are unjustified.	Johnson Mowat on behalf of Taylor Wimpey



Pre-Publication Draft Local Plan (2018) summary of consultation responses

6663	Obj	<p>Objects to the lack of safeguarded land policy and allocations. Rather than allocating safeguarded land the Council are proposing to rely on the continued delivery of a limited number of large allocations beyond the Plan period, believing that this approach will ensure that the green belt boundaries will not need to be altered at the end of the Plan period. We disagree with the Council's stance on this matter, which conflicts with recent Counsel advice regarding advice on the approach contained in the Local Plan. Counsel notes that the most important point is the ability to demonstrate that the Green Belt boundary will not be affected. Counsel also notes that the Council need to provide sufficient land to ensure that the Green Belt remains unaltered well beyond the plan period - this is usually done in the form of safeguarded land but it does not exclude the approach adopted in the Local Plan. The Local Plan has not identified a sufficient supply of sites to meet the future development needs of the District. An insufficient supply of sites to meet the City's development needs and the complete absence of any safeguarded land policy and safeguarded land allocations will mean that there would be nowhere else within the district where the City's development needs could be met. This would be exacerbated if the delivery from some of the allocated sites were delayed by the planning process or not brought forward at all. Plan should allow for a safety net of safeguarded land to ensure that the green belt does not need to be amended at an early stage. NPPF requires local planning authorities to maintain a 5-year housing land supply. The Plan does not provide sufficient sites to deliver this, meaning that the Council would have to undertake a review of the Plan to identify additional sites before the end date of the Plan. If there us no 5-year housing supply there will be significant pressure to amend the greenbelt in 2032 or earlier.</p>	DPP obo Linden Homes Strategic Land
9254	obj	<p>Object to the exclusion of safeguarded land from within the Plan. Safeguarded land should be allocated to ensure the plan can endure 10-15 years beyond the plan period (at least 2043) to create an enduring Green belt. In the context of advice received by Counsel who advised that a time horizon of 10 years beyond the lift of the plan would be considered appropriate, there is a clear risk that the plan will be unsound without the identification of safeguarded land. The justification and reason for not including safeguarded land are flawed because the OAHN taken forward does not meet needs, only 5 years post plan has been accounted for and the the councils reliance on windfalls does not allow flexibility within the plan period; therefore cannot be relied upon to provide a robust approach to the development post-plan. Lack of up-to-date evidence supporting the historic character and setting could render the plan unsound.</p>	How Planning on behalf of Barwood Strategic Land LLP

Pre-Publication Draft Local Plan (2018) summary of consultation responses

9381	obj	No safeguarded land or safeguarded land policy is proposed in the Local Plan; This approach is unsound. Although the Council rely on strategic sites to develop out over a longer period, provision in the longer is severely limited and therefore safeguarded land should be identified to ensure the Green Belt endures. This approach is endorsed by Counsel statements. Site SF4 should be excluded from the Green belt as it is not required to keep permanently open. Reinstatement of this site in the Green belt goes against national policy. The approach taken in the Publication draft (2014) and Preferred Options (2013) is supported. Far greater harm to the Green Belt may come from not allocating safeguarded land.	DPP Planning on behalf of Linden Homes
9381	obj	No safeguarded land or safeguarded land policy is proposed in the Local Plan; This approach is unsound. Although the Council rely on strategic sites to develop out over a longer period, provision in the longer is severely limited and therefore safeguarded land should be identified.	DPP Planning on behalf of Linden Homes
9888	Obj	The plan fails to provide sufficient land for housing and contains no safeguarded land. Safeguarded land needed to allow flexibility up to and beyond the plan period.	Johnson Mowat on behalf of KCS Development Ltd
10097	obj	No safeguarded land or safeguarded land policy is proposed in the Local Plan; This approach is unsound. Although the Council rely on strategic sites to develop out over a longer period, provision in the longer is severely limited and therefore safeguarded land should be identified.	DPP Planning on behalf of Shepherd Homes
10121	Obj	The plan fails to provide sufficient land for housing and contains no safeguarded land. Safeguarded land needed to allow flexibility up to and beyond the plan period.	Johnson Mowat on behalf of Vernon and Co.
12560	obj	No safeguarded land or safeguarded land policy is proposed in the Local Plan; This approach is unsound. Although the Council rely on strategic sites to develop out over a longer period, provision in the longer is severely limited and therefore safeguarded land should be identified.	DPP on behalf of landowner
12656	obj	Failure to identify safeguarded land in the plan is an unsound approach and an ineffective response to the exceptional circumstances requiring green belt review and the establishment of a permanent green belt that will endure beyond the plan period. Identification of safeguarded land is based upon a level of need that is contested and now plan reliant on strategic sites growth beyond the plan period.	Pegasus on behalf of Lovel Developments Ltd.
13099	obj	Including areas of safeguarded land to meet development needs beyond the plan period would demonstrate GB boundaries will not need to be altered post plan period. This is a key omission on the Plan and may result in the plan being found unsound. The Plan should allow for 10 years beyond the plan period either through allocations or safeguarded land to provide robust Green Belt boundaries.	O'Neills Associates on behalf of Galtrees Garden Village Development Company

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13102	Obj	<p>The Pre Publication Draft is an improvement on the Preferred Options Paper of 2016 in that it recognises the Plan Period needs to run to 2038 and not 2032. However, the Pre-publication version fails to provide sufficient land for housing and again contains no Safeguarded Land. This is in our opinion a shortcoming of the Plan. We consider that Safeguarded Land is required in the City to provide a degree of permanence to the Green Belt boundary and avoid the need for future review. It would also provide flexibility and allow land to be brought forward quickly without a fundamental review of the whole Local Plan if allocated sites were unable to deliver the quantum of development envisaged. This is particularly important when considering the complex nature of some of the sites that are proposed for allocation in the Plan e.g. York Central and land to the West of Elvington Lane. Plans is at serious risk of being unsound without any safeguarded land. The Council has also been advised by Counsel that it would be appropriate for the Green Belt to endure for a ten year period beyond the life of the Plan. We therefore request that the Plan is amended accordingly to ensure that it is effective and consistent with national policy. Towards the end of the rep goes into detail on probable long-term shortfall of housing post-2033, different housing need assessments and difficult sites, concludes: the Plan makes very little provision post 2033 meeting less than half the requirement in the period 2032/33 to 2037/38 and with no fall back Safeguarded Land. The table above demonstrates the need to identify long term sources of supply such that delivery can be maintained across the whole Plan Period. In order to remedy the lack of flexibility and potential longer term shortfall up to 2038, the Plan needs to Allocate and Safeguard more land.</p>	Johnson Mowat on behalf of KCS Development
13106	Obj	<p>Objects to the lack of identified safeguarded land. Safeguarded Land is a requirement of green belt permanence, noting that York will be setting its green belt for the first time. It would also provide flexibility and allow land to be brought forward quickly without a fundamental review of the Local Plan if identified sites were unable to deliver the quantum of development envisaged. The approach conflicts with Counsel advice (ref John Hobson QC - <i>"In my opinion if no safeguarded land is identified in the emerging Local Plan this would give rise to a serious risk of the Plan being found unsound. There would be a failure to identify how longer term needs of the area could be met, and in particular a failure to indicate how those longer term needs could be met without encroaching into the Green Belt and eroding its boundaries."</i> Counsel have also advised that it would be appropriate for the green belt to endure for a ten year period beyond the life of the Plan. We therefore request that the Plan is amended accordingly to ensure that it is effective and consistent with national policy.</p>	Johnson Mowat obo landowner
13525	Obj	<p>Insufficient attention is given to any safeguarding outside the plan period.</p>	
60	Supp	<p>Support latest draft LP whereby safeguarded land is no longer designated.</p>	Earswick Parish Council

Pre-Publication Draft Local Plan (2018) summary of consultation responses

77	Supp	Support the removal of all safeguarded land from the Plan - inc site 902 (formerly SF1) and SF14 - to protect the Green Belt, to protect the amenity of Strensall Common SAC/SSSI, to remove the prospect of severe traffic congestion between Strensall and the A1237, to allow CYC more flexibility to respond to changes over next 20 years.	Strensall With Towthorpe Parish Council
2846	Supp	Support the removal of all safeguarded land from the Plan - inc site 902 (formerly SF1) and SF14 - to protect the Green Belt, to protect the amenity of Strensall Common SAC/SSSI, to remove the prospect of severe traffic congestion between Strensall and the A1237, to allow CYC more flexibility to respond to changes over next 20 years.	
6514	Supp	Pleased all references to land identified as safeguarded have been removed from the current Draft Local Plan. It is important land identified for future development is plain and clear and this Plan is a huge improvement in terms of Green Belt protection over the Plan period.	Cllr Paul Doughty

Pre-Publication Draft Local Plan (2018) summary of consultation responses

General Objection			
42	Obj	Concerns that the plan could be found unsound without a final HRA screening showing no LSE, particularly in regard to sites ST15 and ST35.	Yorkshire Wildlife Trust
45	Obj	Plan fails to address deliverability and affordability. Included figures outlining a graphic housing trajectory and completion dates. Believes there is not the construction capacity to bring forward housing at the rate envisaged. The current help-to-buy has not led to an decrease in house prices and there is no indication that increasing housing numbers is leading to a reduction in prices as long as demand is maintained.	YEF
145	Obj	It is considered that the current evidence base does not provide sufficient guidance in this regard particularly in relation to the production of the current Local Plan document. It is recommended that further emphasis is placed on the current Local Plan document within any further iterations of the Statement.	Home Builders Federation
238	Obj	Impact of development on principle characteristics 1, 3 and 4 should be amended to 'uncertain'. The HIA should recommend that an indicative masterplan is produced for this area to demonstrate whether or not the scale of development proposed is achievable in a manner consistent with the conservation of the elements which contribute to the special character of the historic city.	
238	Obj	Impact of development of ST7 upon SOA14 should be amended to "serious harm" as it represents a large encroachment into the open countryside to the east of the City and also causes considerable harm to the views towards the eastern edge of the City from the ring road. This development will, in effect create a new free-standing settlement within the ring road under 160 metres from the edge of the existing built-up area. The Heritage Topic Paper Update identifies the relationship which York has to its surrounding settlements as being one of the elements which contribute to its special character and setting. This new settlement would appear out of keeping with the current pattern of development around York and harm this element of York's character. The HIA should recommend that the eastern edge of ST7 is pulled away from the ring road. The most appropriate approach might be to allow limited development on the eastern edge of the existing built up area of the city provided that this is of a scale that does not harm the scale or compact nature of the city. The impact of development on principal characteristic 6 should be amended to 'serious harm'	Historic England

Pre-Publication Draft Local Plan (2018) summary of consultation responses

238	Obj	Impact of development of ST8 upon SOA14 should be amended to “serious harm” as it will substantially reduce the gap between the edge of the built-up area and the Ring Road and, as such, would adversely affect the rural setting of the city in this location. It would also start to enclose the western edge of the green wedge that is centred on Monk Stray and impact the open areas either side of Monk’s Cross Link Road with the remnants of historic field patterns that contribute to the character of this area. The HIA should identify serious harm in relation to principle characteristic 6, and further recommend that development is pulled away from the northern Ring Road and Monks Cross Link Road.	Historic England
238	Obj	Impact of development of ST14 upon SOA14 should be amended to “serious harm” as it will clearly affect the openness of the Green Belt, resulting in harm to elements which contribute to the special character and setting of the historic City. The degree of harm may be far less than development on the edge of the existing built-up area of the City of within the villages surrounding the main built-up area. However, at this stage, it is by no means clear what impact the infrastructure necessary to facilitate this development might have on the elements which contribute to York’s special character and setting. The HIA should identify serious harm in relation to principle characteristic 6, and further recommend that the impact that infrastructure necessary to facilitate development might have on the special character and setting of the city.	Historic England
238	Obj	Impact of development of ST15 upon SOA14 should be amended to “serious harm” as it will clearly affect the openness of the Green Belt, resulting in harm to elements which contribute to the special character and setting of the historic City. The degree of harm may be far less than development on the edge of the existing built-up area of the City of within the villages surrounding the main built-up area. However, at this stage, it is by no means clear what impact the infrastructure necessary to facilitate this development might have on the elements which contribute to York’s special character and setting. The HIA should recommend that the impact of necessary infrastructure on the special character and setting of the city should be evaluated.	Historic England
238	Obj	The impact of development of ST31 upon SOA14 should be amended to “serious harm” as it could harm a number of elements which contribute to the special character of the historic City. The site is perceived as being a part of the swathe of open countryside south of the ring road, it would alter the relationship of the historic city of York to the surrounding villages and would further reduce the distance between Copmanthorpe and the edge of the City to less than 1km. The HIA should identify serious harm in relation to principle characteristic 6. The HIA should recommend that ST31 is deleted.	Historic England

Pre-Publication Draft Local Plan (2018) summary of consultation responses

238	Obj	The impact of development of ST27 upon SOA14 should be amended to “serious harm” as it could harm two elements which contribute to the special character of the historic City. Expansion of the University would bring development very close to the Ring Road, this will fundamentally change the relationship which the southern edge of York has with the countryside to its south and perceptions of the city while travelling along this route. Development would also alter the relationship of the historic city of York to the surrounding villages, expansion of the University would effectively reduce the gap between the edge of the built up area of the City and this proposed new settlement at Elvington Lane (ST15) to 1.6km. The HIA should identify serious harm in relation to principle characteristic 6, and further recommend that expansion fo the campus is restricted to Campus East and consideration should be given to the expansion on the university in a northerly direction to ST4.	Historic England
238	Obj	The impact of development of ST19 upon SOA14 should be amended to “serious harm”. In order to retain the separation between the Business Park and nearby villages, the southern extent of this area should not extend any further south than the existing car park to the south of Redwood House. Without this reduction, the development of this area would threaten the separation of Northminster Business Park from the village of Knapton which would be just 250 metres from the southern boundary of this area. The HIA should identify serious harm in relation to principle characteristic 6, and further recommend that the southern boundary of the site should extend no further than the car park to the south of Redwood House.	Historic England
238	Obj	The impact of development of ST37 upon SOA14 should be amended to “serious harm” as it would result in the considerable narrowing of the green wedge that centres on Bootham Stray, harming one of the key elements identified in the Heritage Topic Paper as contributing to the special character and setting of York. The HIA should identify serious harm in relation to principle characteristic 6. The HIA should recommend that site ST37 is deleted.	Historic England
238	Obj	The impact of development of E16 upon SOA14 should be amended to “serious harm”. Residential development should not be allowed in the undeveloped area to the south of the existing buildings as it would considerably reduce the gap between the Ring Road and what would in effect be the southern edge of the village of Poppleton, harming a number of elements that contribute to the special character and setting of the city. Moreover, it would also reduce the gap between what would be perceived as being the southern edge of the village of Poppleton and Northminster Business Park leading to the threat of the coalescence of these two areas. The HIA should identify serious harm in relation to principle characteristic 6	Historic England

Pre-Publication Draft Local Plan (2018) summary of consultation responses

238	Obj	disagrees with the conclusions that Policies ED1 to ED5 will have a positive impact against SAO14. Cannot support ED2 as a policy that allows existing buildings on campus to be demolished and replaced could result in considerable harm to the original University campus which is increasingly recognised for its architectural and historic value in terms of post-War University developments. Regarding ED3 same comment as ST27 (Expansion of the University would bring development very close to the Ring Road, this will fundamentally change the relationship which the southern edge of York has with the countryside to its south and perceptions of the city while travelling along this route. Development would also alter the relationship of the historic city of York to the surrounding villages, expansion of the University would effectively reduce the gap between the edge of the built up area of the City and this proposed new settlement at Elvington Lane (ST15) to 1.6km.)	Historic England
238	Obj	fundamentally disagree with Table 6.4 SAO14, given the considerable harm many of the strategic sites seem likely to cause to the historic environment. The cumulative impact of the sites as currently proposed is at best uncertain and at worst likely to result in “serious harm” to that objective.	Historic England
238	Obj	Doubt that the quantum of development being proposed for York Central is deliverable in a manner which will safeguard the numerous heritage assets in its vicinity but also not have significant knock-on effects upon the remainder of the historic core of York. Given this, the impact of the development of this site upon SOA14 should be amended to uncertain. The HIA should recommend that a masterplan is produced for the site to demonstrate whether the scale of development proposed for the area is consistent with the conservation of the elements which contribution to the special character of the historic city. The impact on principal characteristics 1, 3 and 4 should be amended to uncertain.	Historic England
244	Obj	Object to the former ST25 site (Land South of Designer Outlet) not being identified on the Key Diagram as a Strategic Site.	NTR Planning obo McArthur Glen, Aviva Investors & York Designer Outlet
244	Obj	York Designer Outlet is a major tourism destination and should be recognised as such in paragraph 1.43.	NTR Planning obo McArthur Glen, Aviva Investors & York Designer Outlet



386	Obj	<p>We endorse the detailed criticism of the transport model as submitted by York Cycle Campaign and York Bus Forum. The whole approach in the Transport topic paper fails to acknowledge anything other than private car movements in its modelling and therefore seeks to mitigate increased traffic rather than pro-actively identify potential public transport walking and cycling corridors that might be developed from the outset. As stated in response to T1 it also fails to anticipate the likely change in travel behaviour during the plan period, with less commuting and business travel, more remote working, internet shopping etc. The model also fails to take account of the known phenomenon of 'induced traffic' with increased highway capacity. Neither does it consider the detrimental effect such increased traffic across the network is likely to have on cycling and walking on roads in general and especially in and around rural villages where roads often do not have separate facilities for cyclists and pedestrians. The transport model should start from the premise of looking for the most cost effective transport provision for given new development(s) in an area before seeking to mitigate the residual private car movements. This should take account of the potential to link up a critical mass of existing and new housing and places of employment or recreation in order to finance the infrastructure. Reference to this approach particularly for major new 'garden village' sites should be made to this in T1. Lessons should be learned from the city of Freiburg which opened a new tram route linking 5000 households on Vauban to the city centre. Developing from 1998 with all homes built to be within walking distance of a tram stop, the proportion of residents living without a car has increased over time from 50% to around 70%, with nearly 60% of those now without a car having given up owning one on moving there. While funding mechanisms and cultures may be different this is a model that York should seek to emulate. Therefore we believe a much wider study is needed which:</p> <ul style="list-style-type: none"><li>a) Takes full account the transport requirements of the proposals for housing, employment and industry developments set out in the Local Plan;</li><li>b) Does not assume that private car highway demand should or could be met;</li><li>c) Fully explores the potential for public transport interventions including new modes such as light rail/ tram networks</li><li>d) Considers the wider impacts – particularly on the environment and air quality. Without this, the Transport Strategy will fail to meet the test of soundness in terms of the viability of development coming forward in a sustainable manner which doesn't place unacceptable pressure on existing highway networks.</li></ul>	York Green Party
-----	-----	---	------------------

Pre-Publication Draft Local Plan (2018) summary of consultation responses

536	Obj	There is a total lack of evidence provided within the Local Plan & the supporting evidence base on specific site phasing, lead in times & delivery rates. As currently drafted the Local Plan approach to housing supply is considered to be unjustified due to the lack of evidence and inconsistent with paragraph 47 of the NPPF. The Plan's Spatial Strategy relies on the delivery of large strategic sites to provide the majority of the housing requirement - however, they often have complex masterplanning issues which will affect lead in times (Rep includes national research on lead in times across the country). The Plan has 10 strategic sites which, according to national research, would not deliver until later in the plan period - this should be indicated in the housing trajectory. Additional smaller sites should add flexibility. Also, lack of info on how densities calculated.	Lichfields obo Keyland Developments
554	Obj	Criticises plan as confusing and lacking in evidence. References Lichfields review of plan and finding in their report. Plan needs to create a full objectively assessed housing need which it fails to do. Spatial portrait is false - it states York has 'superb quality of life' though this does not account for residents affected by housing price inflation. On the Index of Multiple Deprivation York has become more deprived and sits in the bottom 25% of local authorities in England. Concerned at failure of CYC's delivery of the right number and type of homes, current suggested figure is short of the actual need. Objects to type of developments - small developments around the built edge of the city, which are too close to the main built form and too small to be separate developments. Needs a green belt which will endure beyond the planning period.	
755	Obj	Strongly objects on grounds that we need farm land to feed ourselves, and to any development on land outside the 2 ring roads (A64 and A1237) before any available land within is used, including Hob Moor.	
961	Obj	Objects to all 5,500 proposed homes as this will mean 11,000 additional cars on the road, 11,000 people requiring access to public services (medical, police and social services). Says there is a point at which expansion is not an option.	
1743	Obj	Has read the transport topic paper and does not believe the stated impacts on road traffic are realistic, cycles into the city centre and it often appears near gridlock. Feels additional traffic would bring York to a standstill, therefore doubts the modelling methods, assumptions and subsequent predicted future journey times are accurate.	
1887	obj	evidence out of date for areas currently identified as SLIs around ST15.	
3371	Obj	Comments on how York has deteriorated in the past 20 years in terms of appearance, traffic and lack of green space. Doesn't enjoy York as a place to live.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

5589	Obj	Living in Skelton the journeys on the York Ring Road take a very long time and not uncommon for traffic to queue solidly in both directions at any time of day. Cannot imagine how the impact of extra housing on an already gridlocked ring road is going to work. CYC appear to focus on areas where houses could be built rather than on areas that are likely to sustain development.	
5740	Obj	Concerned about the amount of traffic from development sites that will contribute to congestion on the A1237. Should be more housing around the city perimeter and to the east and south-east sides.	
5741	Obj	Has no objection to some development but feels the methodology behind the plan is lacking. Elvington residents have only ever been asked to comment on CYC proposals, never consulted on what the village needs.	
5826	Obj	Volume of housing proposed is insufficient. By ignoring GL Hearn recommendations the plan risks being found unsound at examination. Executive decision to ignore uplift recommendation based on the reasoning that it 'relies too heavily on recent short-term unrepresentative trends' ignores past under-delivery that has gone on for a number of years and will have caused rapid increases in house prices and suppressed household formation rates.	
10233	Obj	Objects to whole plan because York's main industry, tourism, will be degraded by extra population and associated journeys which will overwhelm already inadequate provision of traffic management and services such as doctors, police and emergency services.	
13093	obj	The number of housing allocations is inadequate to meet anticipated housing needs.	O'Neill Associates on behalf of Jorvik Homes
13106	Obj	It is not possible to consider the suitability of the sites set out in the Plan as it is neither sound nor effective, and has not been positively prepared. Spatial Strategy - the Plan does not adequately set out a proposed spatial strategy and framework for the future development of the City of York. OAHN does not accord with NPPF/PPG; it does not incorporate the latest projects on household formation and jobs growth. The Council has not produced a trajectory or a detailed assessment of the 5-year supply position as required by the Framework.	Johnson Mowat obo landowner
13277	Obj	Concerned about Imphal Barracks Housing and impact on congested Fulford Road and full Fulford School. May cause issues with safety and local resources.	
13311	Obj	Concerned about use of land and implications for future generations.	
13376	Obj	Claims the local plan has been produced without any public consultation whatsoever. Plan fails to address the lack of affordable housing.	
13376	Obj	Asking for confirmation their earlier email has been received.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13377	Obj	There are 1600 people on the social housing waiting list in York, the plan does not provide enough housing never mind social housing. Plans needs to include new council housing and social housing as well as affordable housing for people on minimum wage. Rents should be lowered.	
13380	Obj	Has heard that the green belt is being built on, this is unacceptable. Failing to protect wildlife is short sighted and not a long term solution. Disagrees with central government policy to continue promoting fossil fuels whilst abandoning renewable as it leaves no legacy for future generations, asks for this path not to be taken locally.	
13394	Obj	Objects to a deficiency of affordable houses in the local plan. Objects to plan.	
13420	Obj	Concerns regarding sufficient school places, hospitals and GP Surgery facilities with the planned increase in houses in York and surrounding area.	
13427	Obj	Concern that the proposals do not currently demonstrate commitment to the more sustainable urban environment given climate change and population expansion. This is an opportunity for York to be at the forefront of sustainability and be innovative in terms of decreasing car use, improving air quality that increase sustainability and that are proven to be beneficial to human health and well being. There should be a clear commitment to a significant proportion of low energy, care-free developments along with the urban infrastructure to maintain these. Pedestrians and cyclists are not adequately represented in the transport model.	
13429	Obj	Objects to lack of planning for walking and cycling provisions, which are the most important forms of transport due to their city wide benefits. Focuses on traffic related issues. Fails to see how plan is sustainable if walking and cycling is not accounted for.	
13502	Obj	Feels the paper is formed by an outdated transport model, does not mention walking and cycling and focuses only on motorised traffic. Suggests a variety of other transport models such as PTV. Criticises transport model as providing a predict and provide mentality rather than considering the transport goals of the city and working back from there. There is no consideration of cycling.	
13534	Obj	The impact of developments in the local plan will irrevocably alter the special character of the city. Additional congestion (along with associated noise, air pollution and community severance) will make York a much less attractive place to live, work and visit. York being a small city is part of its special character and it cannot be treated as if it were an industrial city. The increasing student numbers has pushed to breaking point the universities' relationship with the local population. There has been a huge increase in HMOs, many of which have been poorly maintained and led to parking in residential areas. York cannot maintain its special character whilst backing expansions of the universities.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13585	Obj	At 6.5.22 comments on significantly positive effect on SA Objective 4 (education and training) are totally inappropriate, these comments relate to employment and do not consider the education needs of families taking up new housing. 6.5.25 comments on minor negative effects on SA objective 3 (education), before any planning is approved a sufficient nursery, primary and secondary education capacity should be made a compulsory condition of development including the number of each required.	
13594	Obj	The 2014 Open Space and Green Infrastructure report determined the catchment areas by geography and built environment. It then tried to present these to the reader in terms of wards and ward grouping. It is entirely perverse to suggest that because a ward boundary is changed for electoral purposes this alters the catchment areas, it does not. H56 is a defined open space in the 2005 Development Control plan but the 2017 document now states it is not despite being assessed as one in the 2014 Open Space and Green Infrastructure report, it has been removed from being open space without an NPPF compliant assessment. University of York land has no legal public access, as such the land should not be considered public open space.	
13638	Obj	Objects to plan as it does not accept evidence based data and fails to meet York's economic and housing need for the plan period, with concern around affordable housing, sustainable communities and economic growth opportunities.	York Labour Group Members
13643	Obj	No comments	Cubs
13643	Obj	No comments re HRA	Cubs

Pre-Publication Draft Local Plan (2018) summary of consultation responses

Duration of the Plan/Phasing			
764	Comm	Delivery from many identified sites is speculative eg ST1/ST5.	
5617	Comm	There are several brownfield sites which lie close to the centre of York and should be developed in preference to peripheral sites.	
5671	Comm	The plan must seek to protect the rural setting of York, a historic and unique City and its surrounding areas. Brownfield sites, of which there are many undeveloped within the City boundary, must be developed first.	
13102	Comm	It is known and accepted by the Council that it is unable to currently demonstrate a 5 year supply of housing and that matters will only worsen should the adoption of a new Local Plan be delayed. The extent of the current supply and recent shortfall is a matter of dispute as the OAN options referenced above vary significantly. The greater the OAN, the greater the shortfall and the greater the 5 year requirement looking forward over the next 5 years once the Framework para 47 shortfall and buffer are correctly applied. The Council's 2017 Local Plan and SHLAA both contain a delivery trajectory but lack any real detail. From the material available, it would appear the Council is reliant on several large strategic sites making an early delivery start with high levels of delivery. It is our opinion that this approach is unrealistic, especially given known and well researched lead in times for large strategic sites such as ST14 and ST15, ST35. When an OAN higher than that sought in the Local Plan is applied with longer lead in times from these larger more remotes sites is applied, the current Local Plan falls well short of an early years 5 years supply.	Johnson Mowat on behalf of KCS Development
13248	Comm	Build only on brownfield sites - do not build on green field sites	
10074	Comm	ST4 is a more preferable site to ST15 as it already has infrastructure in place and has better access to the A64.	
1675	comm	Unclear how trajectory support brownfield first if all sites are being released in single phase.	Johnson Mowat on behalf of Taylor Wimpey
145	Obj	The Local Plan document states that the plan covers the period from 2017 to 2032/33 with the exception of the Green Belt boundaries which will endure up to 2037/38. However, it is evident that other policies within the plan also include information to the period to 2037/38. This appears to provide opportunity for confusion and it is considered that it may be more appropriate to move to a consistent plan period to 2037/38. It is also noted that the 2032/33 plan period will not ensure a 15 year time horizon post adoption as preferred by the NPPF, paragraph 157. Whilst it is recognised this may have implications for the evidence base, site allocations and plan policies, the HBF recommends that the Council considers extending the end date of the Plan.	Home Builders Federation

Pre-Publication Draft Local Plan (2018) summary of consultation responses

9254	obj	The inclusion of specific provisions with strategic policies gives no certainty to delivery of sites.	How Planning on behalf of Barwood Strategic Land LLP
13102	Obj	Under the sub-heading 'About the Plan' para i) confirms the Local Plan Period runs from 2017 to 2032/33 with the exception of Green Belt boundaries which will endure to 2037/38. The text requires clarification. Points to note are:- 1)The Plan Period should be 1st April 2017 to 31st March 2038. This would remove any confusion. 2) The housing allocations only partly extend beyond 2033, significantly tailing off after that date such that the five year period 2033 to 2038 only delivers half the housing requirement in those years - even then, delivering from no more than 3 known sites and windfall. Given there is no Safeguarded Land in the Plan, it is clear the Plan fails to justify the 2038 end date with the allocations as presented in Trajectory (Figure 5.1) demonstrating those shortcomings.	Johnson Mowat on behalf of KCS Development
13106	Obj	The Council has not produced a trajectory or a detailed assessment of the 5-year supply position as required by the Framework. Plan period should be described as 1st April 2017 - 31st March 2038 to avoid confusion. Housing delivery beyond 2033 tails off (delivering only half its annual requirement) and only from 3 known sites. given the lack of safeguarded land, the Plan fails to justify its 2038 end date with the allocations presented in the trajectory. Note likely delivery issues re York Central.	Johnson Mowat obo landowner
13235	Obj	Supports brownfield before greenfield.	
13405	Obj	CYC plans to build on sites it knows won't be available in time. CYC wants to build 2500 houses on sites it knows won't be ready for many years, if ever. York's housing need is urgent. Sites such as British Sugar need lengthy decontamination before they can be built upon. Imphal & Strensall Barracks haven't yet got to the stage of finalised plans	

General Comment			
2	Comm	<p>Habitat Regulation Assessment (HRA). Broadly welcomes the HRA which is clear, logical and appropriately referenced. Concur with the selection of sites and welcome the identification of potential mechanisms by which relevant European sites may be affected. Broadly welcome and agree with the screening of policies in section 3, however there are a number of concerns regarding the screening out of certain impacts. 1. Agree that air quality impacts from traffic emissions on roads in close proximity to Strensall Common SAC cannot be ruled out with regard to likely significant effects and traffic modelling should be undertaken. This should be with regards to the impact of the wider plan and any neighbourhood plans not just the nearby housing and employment allocations. However it is correct to identify that these sites are likely to contribute most. 2. The issues identified in paras 3.61 to 3.72 can be considered in the assessment, the assessment of traffic emissions on the River Derwent SAC, Lower Derwent Valley SAC, Ramsar and Special Protection Area (SPA and Skipwith Common SAC should focus on whether there are roads within 200m of the sites and if they are to see significant increases. 3. broadly agree with the assessment of recreation disturbance in paras 3.24 to 3.51 the wider cumulative and in-combination impacts of the Plan and neighbouring plans should be considered in relation to recreational disturbance on Strensall Common SAC. Further discussion of available alternative Greenspace and potential for mitigation should be explored in relation to the Lower Derwent Valley European Sites. Agree with the conclusions with regards to the impacts of Policy SS19 and sites E18 and H59. Proximity of ST35 to Strensall Common wider urban edge effects should be considered in the Appropriate Assessment. Welcome the identification that further assessment is required with regards to the impacts from ST15 on the Lower Derwent Valley SPA bird species. Site ST35 includes a section of the Strensall Common SAC within its boundaries. This should be removed in order to avoid any direct loss of designated features.</p>	Natural England
3	Comm	<p>The baseline assessment for geology (Para. 4.14.1) focuses on agricultural soil. Information could be included on local bedrock (Sherwood Sandstone) and aquifer designations (principal Aquifer). Enquired whether it would be possible to provide some further explanation of each sustainability objective in the documentation to better understand how the impacts on groundwater have been considered in the sustainability assessment.</p>	Environment Agency



Pre-Publication Draft Local Plan (2018) summary of consultation responses

3	Comm	The baseline assessment for geology (Para. 4.14.1) focuses on agricultural soil. Information could be included on local bedrock (Sherwood Sandstone) and aquifer designations (principal Aquifer). Enquired whether it would be possible to provide some further explanation of each sustainability objective in the documentation to better understand how the impacts on groundwater have been considered in the sustainability assessment. The SUNO CAMS updated in 2013 referred to in Section 4.8.6 has been updated again, recently, and will be uploaded at the end of 2017. Any local Plan updates after the CAMS is published should reference the updated CAMS.	Environment Agency
4	Comm	HE comments build on previous responses to Local Plan Preferred Options stage in 2013 and Preferred Sites Consultation in 2016 and are set in the context of Department for Transport Circular 02/2013. The list of supporting documents includes a Transport Topic Paper that is mainly devoted to modelling issues, but there is no link to and infrastructure Delivery plan (IDP) or similar document which HE would normally look to identify any potential requirements for the SRN. HE would like to have an input to the updating of the IDP (produced in 2013) before full Publication Draft consultation.	Highways England
7	Comm	Officers look forward to working with the City of York Council on the progress of both the City of York Plan and the emerging Hambleton Local Plan to ensure the requirements of the Duty to Cooperate are fulfilled. Hambleton District Council welcomes the opportunity meet with City of York council with a view to developing a Statement of Co-operation	Hambleton District Council
42	Comm	Strongly supports the Council finalising an up to date Local Plan. Without an adopted plan the authority will be at risk from developers submitting planning applications for development on sites which will have damaging impacts on wildlife and biodiversity.	Yorkshire Wildlife Trust
45	Comm	There is a lack of tree data and no tree strategy in the green infrastructure section. Feels the natural environment will not be protected until there is a Green Infrastructure Strategy in place. Supports One Planet York principles. Submitted and made reference to Master Plan of Rural West York. Summarised, the document proposes methods on how to complete/ improve the Bridleway/cycling route.	YEF
45	Comm	Supports the report, but does not update study in relation to the application of Open Space standards to Strategic and Local Development sites. The Wheatland Community Woodland and semi natural section (2.187) is incorrect as it is an isolated commercial tree plantation, not natural, and is not open to the public. Requests to remove this section. Poppleton Neighbourhood Plan is premature to the York Plan. Does not agree with Poppleton Parish that the site is SLI. Objects to the lack of inclusion of the Yorwaste Landfill site reinstatement to a nature reserve plan on pages 58/59. Healthcare section in Green Infrastructure Strategy needed, YEF has provided evidence to CYC.	YEF
59	Comm	The Parish Council remain opposed to developments in back gardens which add to the surface water problems in the village and change the character of the village.	Dunnington Parish Council

Pre-Publication Draft Local Plan (2018) summary of consultation responses

61	Comm	The Parish Council does not oppose new development but has never been asked what the village actually needs.	Elvington Parish Council
66	Comm	Although no new building is planned for Holtby, the impact of development in Stamford Bridge area could increase the volume of traffic through the village, increasing road safety issues. Concerns over the current flows of traffic should be noted and appropriate Council funding budgeted.	Holtby Parish Council
68	Comm	KPC would like to see a large percentage of this funding invested in infrastructure to benefit their quadrant of York and to ease congestion.	Kexby Parish Council
71	Comm	Higher education - what are the predicted numbers and how is the University planning to accommodate these numbers?	Nether Poppleton Parish Council
71	Comm	SINC designation is only a convenient way of the City delaying building on land until the price is right. Experienced removal of all SINC on York Business Park.	Nether Poppleton Parish Council
71	Comm	As the Local Plan has a reputation for not getting further than a draft, the date line of the plan needs to be flexible but there are no time dates given in the plan.	Nether Poppleton Parish Council
71	Comm	Would like a sentence added at para 2.13 to reflect the historic and special character of villages.	Nether Poppleton Parish Council
78	Comm	Higher education - what are the predicted numbers and how is the University planning to accommodate these numbers?	Upper Poppleton Parish Council
78	Comm	SINC designation is only a convenient way of the City delaying building on land until the price is right. Experienced removal of all SINC on York Business Park.	Upper Poppleton Parish Council
78	Comm	As the Local Plan has a reputation for not getting further than a draft, the date line of the plan needs to be flexible but there are no time dates given in the plan.	Upper Poppleton Parish Council
78	Comm	Would like a sentence added at para 2.13 to reflect the historic and special character of villages.	Upper Poppleton Parish Council
79	Comm	The Parish Council supports the manifesto of the York Action Group Alliance (YAGA) which supports the outer Parishes of York.	Wheldrake Parish Council
80	Comm	The three primary schools of Haxby and Wigginton are almost at full capacity and although they have space to expand this would result in the loss of play and activity spaces. Pre-schools are also near capacity. There is no secondary/sixth form education in Haxby and Wigginton. Any increase in number of households will require increase in school places.	Wigginton Parish Council
80	Comm	There is a need in both Haxby and Wigginton for increased allotment spaces and open play space.	Wigginton Parish Council
80	Comm	There is currently no potential to expand present sports playing area facilities based at the west end of the village. Developers should be charged with funding a major increase in open space provisions.	Wigginton Parish Council

Pre-Publication Draft Local Plan (2018) summary of consultation responses

80	Comm	There are many activities available in the village but these need to be periodically reviewed to ensure they meet demand. There is a need for a skateboard facility.	Wigginton Parish Council
80	Comm	Serious need for resource to provide help and advice (citizens advice) to residents in Haxby and Wigginton.	Wigginton Parish Council
80	Comm	Haxby and Wigginton are low crime areas but would benefit from a dedicated police presence to ensure this is maintained. The fire station at Earswick should be manned at all times to ensure better attendance times to the areas it covers.	Wigginton Parish Council
80	Comm	Historically it is thought that there may be land contamination in Haxby/Wigginton. This needs to be investigated before any development takes place.	Wigginton Parish Council
80	Comm	Wigginton is on the edge of a large rural area. A number of studies show that air pollution from busy roads affects the health of those living nearby.	Wigginton Parish Council
80	Comm	Haxby and Wigginton are well maintained and of good appearance. This is currently under threat by decreased funding and activity by City of York Council.	Wigginton Parish Council
98	Comm	Notes that, to ensure that local communities and consultees have a secure locus in the decision making process, more specific mention should be made of statutory and non-statutory local consultees in the delivery mechanism for each policy. Also, the distinction between English Heritage and Historic England should be made clear.	York Civic Trust
102	Comm	CYC have a poor record in enforcing planning constraints relating to nature conservation even on their own land. Doubtful that any provision for mitigation, compensation or otherwise infringing on important sites will succeed. The Council cannot be further allowed to permit mitigation until it has proved able to enforce its proper use and maintenance. A prime example is what has been allowed at Derwenthorpe and non-existent compensatory works elsewhere - similarly at the University where additional land has been gobbled up for further development. PLANNING OBLIGATIONS MUST BE ENFORCED. Lengthy legal documents relating to green infrastructure - green corridors need to be protected. Insufficient resources are provided to manage existing green spaces/corridors etc - good management needs to be recognised. Road and other verges are important green corridors ignored in York - a policy could afford biodiversity at minimal cost.	York Natural Environment Trust Ltd
102	Comm	One mention of disability (in the Housing Section) is provided in the entire document. Given much of 'old' York has access problems can guidance on the provision and design of accessible new buildings and public spaces be added?	York Natural Environment Trust Ltd

Pre-Publication Draft Local Plan (2018) summary of consultation responses

136	Comm	Once estimated capacity requirement over the timescale of the plan is established then a costed commitment to meet that requirement before or in line with the growth in demand should be mandatory.	Skelton Village Trust
187	Comm	Welcomes this consultation on the local Plan that will hopefully take the city to an adopted Local Plan in the near future. The Chamber has commented on previous stages of the Plan, most recently the Preferred Sites Consultation in September 2016. The Chamber is in the position of re-iterating almost every point made in its previous representation (contained as an annex). This representation expands and updates previous comments. Comments made in the 2016 representation under the heading of 'The Barriers to Achieving a Sound Plan' remain unchanged. The Local Plan is an important document for the future development of the city. The document should be accessible and easy to read and follow. For people not regularly involved in the planning system, the document will appear lengthy and intimidating.	York and North Yorkshire Chamber of Commerce
192	Comm	The Main Local Plan Proposals Map. Query over Nether Poppleton and York Business Park - is the nature area shown on the wrong side of the road, Minster Way?	
192	Comm	Why is it necessary to change the designation from Green Belt to Open Space? As the land is already Green Belt it can be used for these purposes.	
192	Comm	Local Plan Proposals Map - at York Business Park and British Sugar does the map depict 2 new rail halts with a bridge linking the two? This could be made clearer.	
198	Comm	Proposals Map North needs clarification where it identifies a number of small areas of existing open space within the York Central site. These are generally self-seeded groups of trees or small areas of space with limited function. What are the value of these areas? York Central is expected to include major new areas of open space including a green park and civic square. It is therefore important that any restrictive designation are necessary.	National Railway Museum
220	Comm	Plan makes little reference to the Racecourse. This should be amended to reflect the significant economic and tourism impact that the racecourse has in York.	Turnberry Consulting on behalf of York Racecourse
238	Comm	Proposals map should show the precise boundaries of each Conservation Area, the Area of Archaeological Importance and boundaries of each Scheduled Monument. Map identifies general location of scheduled ancient monuments, incorrectly shown in the key as 'Areas of Archaeological Importance'.	Historic England

Pre-Publication Draft Local Plan (2018) summary of consultation responses

238	Comm	It would be preferable to refer to the number of designated heritage assets on the Historic England Heritage at Risk Register. Table 15.2, Section 8, Indicators, second bullet-point amend to read:- " <i>Number of designated heritage assets on the Historic England 'Heritage at Risk Register.'</i> "	Historic England
238	Comm	it was not clear precisely how the conclusions of the Heritage Impact Assessment (HIA) have been incorporated into the Sustainability Appraisal. The HIA evaluates the impact of each of the allocations against each of the six Principal Characteristics of the City which are set out in the Heritage Topic Paper. However, the HIA does not make an overall conclusion about the likely impact of each of those sites upon the historic environment. It is therefore not clear how Table NTS3, for example, has arrived at its assessment of the likely impact of each of the sites upon SAO14. There needs to be greater clarity of how the conclusions of the HIA relate to SOA14.	Historic England
293	Comm	Submission is a detailed suggestion for a Pub Protection Policy to be incorporated into the Local Plan. 6 pages in length, refers to NPPF and existing legislation.	York Campaign for Real Ale
349	Comm	Certain sites identified in the emerging Plan should be consistent with Sport England's Playing Fields Policy. This is especially important where Sport England would be a statutory consultee on developments that would prejudice the use of playing fields as defined by Article 16(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2010 in that it is on land that has been used as a playing field within the last five years, and the field encompasses at least one playing pitch of 0.2ha or more, or that it is on land allocated for the use as a playing field in a development plan or in proposals for such a plan or its alteration or replacement. Sport England would wish to avoid a situation where an adopted sites allocation document encourages certain types of planning applications which Sport England later has to object to as they are not consistent with our Playing Fields Policy. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or, the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or, the development is for alternative sports and recreational provision, the need for which clearly outweighs the loss.	Sport England

Pre-Publication Draft Local Plan (2018) summary of consultation responses

384	Comm	Concerned at the failure of CYC to plan for and ensure balanced communities with the evaporation of facilities promised through previous planning briefs and master plans. These should be protected by the Local Plan - provision remote from the communities these served is unacceptable. It is important that brownfied site developments contribute their share of new green space including play and sports facilities and address specific shortfalls to ensure quality environments. Concerned that the proposed Elvington Airfield Development is not big enough to fund a full range of community facilities to make it self sufficient. It should be larger to help the housing shortfall.	York TUC
434	Comm	Proposals Map. The proposals map includes an annotation to the north of Site ST1 identifying a potential new bridge/ enhancement across the Harrogate rail line, adjoining land safeguarded for potential future transport schemes. It has previously been agreed that the provision of such improvements is not necessary to ensure that the proposed redevelopment of British Sugar is acceptable in planning terms. The annotation is not objected to but should be noted that this is not a requirement of the British Sugar development.	Rapleys LLP on behalf of British Sugar PLC
438	Comm	There is a need for high quality housing, using local labour, local/ British materials and build in charging points for electric vehicles.	
540	Comm	It is not possible to comment on the extent to which the Council has fulfilled its statutory duties in respect of its Duty to Co-operate, since the final version of the 'Duty to Co-operate Statement' is not yet available. The Plan proposes that it can accommodate all its development requirements within its administrative boundary. Nevertheless, with increased housing requirements, the Council will be under pressure to identify further development land. The re-instatement of a residential allocation of the land north of Escrick should be reconsidered in conjunction with Selby DC, under the Duty to Co-operate. Where adjoining authorities are in the process of preparing or reviewing Local Plans the Duty to Co-operates should extend to reviewing the need for the York Green Belt to 'spill out' into these adjoining areas, particularly into areas lying beyond 6 miles from the City Centre.	Jennifer Hubbard Town Planning Consultant
540	Comm	Good to see some policies are now included which address agricultural issues and rural development generally. However, given the residual approach to the Green Belt, the Plan provides very few opportunities for rural / land based businesses to become established or expand. The problem is compounded by the opportunities which now exist under PD rights to convert many agricultural buildings to up to 3 dwellings and convert office premises to dwellings, due to financial reasons. See also para 28 of NPPF.	Jennifer Hubbard Town Planning Consultant
718	Comm	Each area of York should have a Green Belt, a nature reserve, a village green with a maypole and be environmentally friendly with good transport links.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

943	Comm	Stresses the importance of providing affordable housing, take precautions regarding flood risk and maintain an adequate green belt. Says local concerns about resource extraction - fracking - must be listened to.	
943	Comm	Plans needs to provide sufficient affordable housing. Must take account of flood risk in planning process and maintain the green belt. Local communities must be listened to regarding resource extraction i.e. Ban fracking.	
947	Comm	Comment raises a number of general issues, namely: car ownership is a realistic requirement - parking should be provided in new developments. Regular affordable bus services are required. City should provide employment/housing opportunities for locals (incl those with disabilities/elderly). Universities should provide more housing for their students.	
1355	Comm	Points made in the previous consultation in 2016 which have not been addressed remain valid. it is important that all points raised by residents during this consultation process are considered before final submission. It is important to consider the impact of neighbouring authorities and sites which are close to our local authority boundary. The positioning of key strategic sites nearby to local authority boundaries are not considered in this process but can have major implications particularly for road infrastructure. A wider strategic approach should reflect the impact of proposed developments on neighbouring authorities.	Julian Sturdy MP
1466	Comm	The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.	Network Rail
1741	Comm	It is considered that the build out rates and density levels in the SHLAA are not realistic or robust. In addition the SHLAA overestimates the gross to net ratios when considering large sites. That will require considerable on site infrastructure and ancillary uses such as open space, schools. local services etc. The assumptions used in the SHLAA do not appear to be supported by any local evidence.	Carter Jonas on behalf of client
1741	Comm	It is considered that the build out rates and density levels in the SHLAA are not realistic or robust. In addition the SHLAA overestimates the gross to net ratios when considering large sites. That will require considerable on site infrastructure and ancillary uses such as open space, schools. local services etc. The assumptions used in the SHLAA do not appear to be supported by any local evidence.	Carter Jonas on behalf of client
2314	Comm	Plan should have a comprehensive integrated transport plan involving a purpose built road/ rail interchange in 'York's Teardrop'.	
2765	Comm	It is important that Listed Buildings are used and maintained to stop them becoming derelict. It is important that new development uses appropriate form, scale and materials as well as maintaining the setting of Listed Buildings and Conservation areas.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

2846	Comm	Very pleased that certain site as before have been removed from the Local Plan and that current sites are not to be overdeveloped. Totally agree with Strensall & Towthorpe Parish Council's submission (attached)	
2995	Comm	My comments on previous consultation remain the same.	
3111	Comm	Schemes at the Sugar Factory and Teardrop need to be finished first. Concerned about employment and local wages. Infrastructure needs to be attended to first - stations at Haxby and Strensall and A1237 duelled. Public transport unreliable and expensive. More cycling lanes needed.	
3549	Comm	Concerned that more housing would increase traffic on the already congested highways system. Suggests building a train station to alleviate traffic in Strensall and Haxby.	
3907	Comm	Main concern is provision of affordable housing and infrastructure to support any new development. As a Huntingdon resident is supportive of dualling the northern ring road, it is often congested at peak times.	
4200	Comm	The comments form is misleading stating 'comments made on previous stages of the Plan will be taken into account'.	
4690	comm	North of York is overburdened with development and northern ring road is congested, development of south is far less.	
4693	Comm	Need more roads, parking, schools and doctors before more houses are built.	
4819	Comm	There is a lack of tree data and no tree strategy in the green infrastructure section. Feels the natural environment will not be protected until there is a Green Infrastructure Strategy in place. Supports One Planet York principles. Submitted and made reference to Master Plan of Rural West York. Summarised, the document proposes methods on how to complete/ improve the Bridleway/cycling route.	Treemendous
4819	Comm	Supports the report, but does not update study in relation to the application of Open Space standards to Strategic and Local Development sites. The Wheatland Community Woodland and semi natural section (2.187) is incorrect as it is an isolated commercial tree plantation, not natural, and is not open to the public. Requests to remove this section. Poppleton Neighbourhood Plan is premature to the York Plan. Does not agree with Poppleton Parish that the site is SLI. Objects to the lack of inclusion of the Yorwaste Landfill site reinstatement to a nature reserve plan on pages 58/59. Healthcare section in Green Infrastructure Strategy needed, YEF has provided evidence to CYC.	Treemendous



Pre-Publication Draft Local Plan (2018) summary of consultation responses

5151	Comm	The beautiful green countryside surrounding York is part of the City's special character and culture - not least that surrounding Heslington. These green fields are hugely productive and provide a livelihood to the resident farmers is an added bonus. Building this town will create an enormous impact on the environment surrounding Heslington - apart from the visual impact and endless assault of noise and dust from the building the wonderful wildlife we currently enjoy would simply disappear and the development would not respect the unique character and culture of Heslington. Brownfield land should be used to its maximum capacity first.	
5189	Comm	Gets the impression that the local plan is just about house building and not community building. Community building requires infrastructure to support it - open space; public buildings and commercial facilities. Most important is infrastructure that allows people to travel easily. Feels the council will not invest in basic infrastructure, along long queues on North Ring Road, barracks development in Strensall (ST35) does not address the issue of traffic or access to North Ring Road and the A64.	
5195	Comm	The city needs a large number of social houses / flats as well as affordable houses / flats. Green spaces such as the area close to Walmgate Bar should not be sold off to private developers. Land should be developed by the council rather than sold off to developers. As soon as land is sold off to developers the price of housing built on it will rise.	
5450	Comm	Volume and detail of documents is so large as to dissuade a careful and considered response.	
5599	Comm	Needs a clear and deliverable city wide strategy in Transport Topic paper to improve routes for cyclists and pedestrians in line with One Planet principles.	
5671	Comm	Concerned that the document's complexity and short time-frame for consultation will mean that there is limited meaningful engagement from York residents. Supports plain english versions of documents with headline proposals alongside high resolution maps.	
5700	Comm	Queries how new development will impact on local services, in particular health services, education and traffic. Roads are already congested, not enough doctors/hospitals and classrooms are full. Would like reassurances that any new housing scheme planned is integrated with essential services.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

6042	Comm	<p>The A1237 is heavily congested for significant parts of the day yet thousands of houses are planned for north of the city which will result in more congestion.</p> <p>Houses are planned for areas prone to flooding - engineering and design solutions are used in other countries to lessen the impact - these solutions should be considered by CYC.</p> <p>When parking is an issue CYC should insist on more underground parking for new commercial developments.</p> <p>Students in general are occupying lots of low cost housing - the universities should be looking to provide more.</p>	
6065	Comm	<p>Would like to see housing on brownfield sites and affordable housing, enhancing the natural environment.</p>	
6143	Comm	<p>What I have read of the Plan appears to be very sensible and logical development for the city. Cannot comment on whether the estimates of housing requirement are appropriate, but hope that adequate provision of utilities, health care, social care and schooling is made. Well done to the planners as there is a wealth of data available on line.</p>	
6519	Comm	<p>Villages must be well separated from new development. Any new access roads for proposed developments must have minimum impact on existing residents and the green belt.</p>	Osaldwick and Derwent Ward Councillor
9176	Comm	<p>Clarity of district maps should be improved and in colour so more readable.</p>	
9208	comm	<p>Land at Stockton Hermitage is managed woodland. Part of identified as NCA and area owned by CYC is not NCA. This section of woodland connects to Strensall Common and is an important link between the SSSI and proposed NCA. The response questions why only parts of Damhill Woods is included as a SLI. Biodiversity Action Plan wrongly includes the land as 'acid grassland and scrub'.</p>	
9379	Comm	<p>Latest figures show UK population is expected to be two million less than when the guidelines for the local plan were set, asks when the plan will be amended to take this into account. Cannot understand where the jobs are going to come from, fears York is just going to become a dormitory town for Leeds. Recent growth of the city has been fuelled by expansion of the universities but this must be coming to an end.</p>	
9445	Comm	<p>States there is too much information in the full document for them to take in, generally in favour of proportional development in the more rural areas covered by the plan including Rufforth. Concerned about the substantial number of new houses near Elvington as current infrastructure could be rapidly overwhelmed, particularly the road network.</p>	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

9481	Comm	1. All large developments must be put on hold until after we know how leaving the EU develops. 2. the only people to benefit from housing are building developers. 3. York and North Yorkshire get 29-30million visitors each year, knowing about the gridlock is part of the problem. 4. This city has lost some 10,000 jobs to the EU with no hope of getting them back. 5. the top priority is stimulating rail or other 6. put the building plan on hold .	
10615	Comm	Need for proper infrastructure before any further development. Bypass should become a dual carriageway, public transport cheaper and more accessible, more open spaces and parks.	
10786	Comm	It is important for developments to enhance their locations, or at least to remain neutral, but not to make them worse. Should ensure that the development is integrated with the amenities of the city as a whole, rather than treated as an isolated site. Refers to impact of moving Askham Bar P+R site on traffic/parking at Moor Lane/Woodthorpe Shops/Middlethorpe Drive.	
12113	Comm	More information about infrastructure to support proposed housing needed. Affordable housing and rental needs to be included. Ring road is congested, NHS stretched and Strensall primary school is full.	
12129	Comm	National Grid owns and operates the high voltage electricity transmission system in England and Wales and operates the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. National Grid has on 275 kV high voltage overhead line (XCP route) and two high voltage overhead lines (4ZR and YR routes) within City of York Council's administrative area (shown on a plan ET136 submitted as Appendix 1). National Grid may have a Deed of Easement for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect its assets. National Grid prefers that buildings are not built directly beneath its overhead lines, for two reasons: the amenity of potential occupiers of properties in the vicinity of lines and National Grid needs quick and easy access to carry out maintenance of its equipment.	Amec Foster wheeler on behalf of National Grid
12129	Comm	Need to remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect its infrastructure. National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to an overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid's 'A Sense of Place' guidelines look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.	Amec Foster wheeler on behalf of National Grid

Pre-Publication Draft Local Plan (2018) summary of consultation responses

12235	Comm	No additional development should occur on Tadcaster road until traffic flow is increased.	
12245	Comm	The designation of 'openspace' and the designation as such is a concern as typified by comments from our members. Clarification has been sought from CYC and the fact many queries have been raised by members suggests the Plan does not give the necessary level of information. If designation is to have an impact upon land held by members it is a concern that they have not been approached before. Openspace can mean many things and this results in uncertainty. Our members businesses rely on certainty so plans for the future can be made as the ability to diversify is impacted by restrictions put in lace. The plan states 'presumption against loss of open space of environmental or recreational importance' clarification of this would be appreciated.	NFU
12245	Comm	Agriculture continues to be a key component of our local economy - arable fields surrounding the city contribute to the rural landscape and characteristics of the area, they should be valued for this reason and also the contribution they make to the environment.	NFU
12284	Comm	New developments should have more trees and wooded area built into them to help wildlife thrive and for flood prevention and air quality reasons. New streets should be tree-lined where possible to make York greener.	
12389	comm	Reliance on several large strategic sites which require significant infrastructure questions the deliverability of a 5 year housing supply. It represents an "all eggs in one basket approach". The plan should include a wider range of sites of varying sizes which could come on stream more readily throughout the plan period.	
12389	comm	Reliance on several large strategic sites which require significant infrastructure questions the deliverability of a 5 year housing supply. It represents an "all eggs in one basket approach". The plan should include a wider range of sites of varying sizes which could come on stream more readily throughout the plan period.	
12659	Comm	Proposals Map North needs clarification where it identifies a number of small areas of existing open space within the York Central site. Further clarification is sought as to the value of these areas. Important that restrictive designations are only applied as necessary.	Arup on behalf of the York Central Partnership
12661	Comm	Moving towards an approved Local Plan is vitally important to the city's long term future development and Make it York is wholly supportive of the City Council's efforts to move it forward.	Make it York

Pre-Publication Draft Local Plan (2018) summary of consultation responses

12765	Comm	It would seem that the formulation of the York Local Plan is not based on a long term vision for the future which aims to provide good quality housing for all and encompasses practical solutions for the provision of infrastructure to cope with minimum damage to the existing environment, but supporting the wishes of those who do not want any change. Question the real policy motives that have been the background to the formulation of this Plan - is it as the narrative suggests, to achieve all the laudable goals of living in paradise for all citizens of York, or a plan based on the avoidance of antagonising those who want to preserve their privileged outlook in the peripheral settlements.	
12786	Comm	Access through The Grove will be hazardous for safety and transport due to students entering York college on foot and bike, which leaves the road congested. Traffic should enter at Principals Rise where there is a wide island with room for parked cars. There are full border shrubberies on the site which are full of wildlife.	
13003	Comm	There is a determined politicisation of the Plan in pursuing intense city centre development, mainly in wards with Labour Councillors, while ensuring that more rural locations are comparatively under-developed. York has some major environmental challenges and the Plan neglects prime planning considerations. York's environmental footprint could get worse, rather than be enhanced. It is vital that the intensity of density is reduced on brownfield, city centre locations.	Rachael Maskell MP
13003	Comm	The Local Plan for the city of York is vital to address the housing, transport, infrastructure, environmental and economic needs of York for the next 15 years and into the future. For York to grow in a planned way, it is vital that a strategic planning framework sets out the core principles of how the local authority will meet the challenges that York faces.	Rachael Maskell MP
13025	Comm	The allocated density of spacing per dwelling (yield) on developments within the Plan may contradict best practice.	Integrated Built Environment Ltd
13030	Comm	The June 2013 Sustainability Appraisal identified as preferred spatial distribution as follows: <i>'Prioritise development within and / or as an extension to the urban area and through the provision of a single new settlement'</i> . The policy articulation of this was provided through Policy SS3 of the 2013 Draft Local Plan. The 2013 Sustainability Appraisal continues to be relied upon by the Council in determining the most appropriate spatial strategy for York and the spatial distribution of development sites. There has been no reconsideration of the spatial distribution of sites through the development of the Local Plan and so it is assumed to be the case that the preferred option tested through the 2013 Sustainability Appraisal remains the Council's selected option for the purposes of the Local Plan.	Turley representing Gallagher Estates

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13099	Comm	The council's powers to secure the proposed densities identified for site allocations is weak.	O'Neills Associates on behalf of Galtrees Garden Village Development Company
13103	Comm	Need clarity regarding the plan period It should be 1st April 2017 to 31st March 2038. Given the lack of safeguarded land, the plan fails to justify the 2038 end date.	Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees
13104	Comm	Need clarity regarding the plan period It should be 1st April 2017 to 31st March 2038. Given the lack of safeguarded land, the plan fails to justify the 2038 end date.	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
13193	comm	There is an over reliance on strategic sites which will not deliver until later in the plan period. Also support for more sites included in the short term to meet need. Support for site submission to deliver in the short term. Also consider that it is unreasonable to rely on windfalls and therefore the windfall allowance should be removed and added to the requirement to identify sites	
13204	Comm	The draft Plan sets out the vision for York district until 2032/33 with the exception of the Green Belt boundaries which will endure up to 2037/38 and outlines how sustainable development will be delivered. The Plan forms a complete suite of local policies therefore it directly addresses many aspects of the strategies laid out in the SEP. The Plan supports the protection of areas of York's historic character, open countryside and landscape value which provide leisure and recreational value for York and the wider City Region. This supports the SEP objectives for good/inclusive growth and will support delivering sustainable, mixed communities.	Leeds City Region Local Enterprise Partnership
13083	Comm	York is largest centre in the LEP area and a major economic asset. It is an important entity in its own right and exerts an influence over much of the LEP area. It has particular economic strengths and opportunities however the special character of the city and its traffic congestion create challenges in accommodating much needed housing and economic growth.	York, North Yorkshire and East Riding LEP

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13205	Comm	Although initial work shows positive viability on the strategic sites and for the Plan overall, this LEP welcomes early discussions regarding schemes where external funding (through Local Growth Fund or HCA initiative for example) is likely to be required.	York, North Yorkshire and East Riding LEP
13207	Comm	The group would expect to be consulted at an early stage of new major housing sites.	NHS Vale of York Clinical Commissioning Group
13211	Comm	Comments relate to the potential need for network reinforcement for connections to some of the proposed development sites. This may have impacts on development timescales.	Northern Power Grid
13213	Comm	The HCA is concerned by the level of information that developers are being asked to provide to support planning applications by these policies [HW1 to HW7 and ED6]. It appears disproportionate and may deter or delay successful development from coming forward. Further clarity is required as to the scope of such documents with particular reference to paragraph 46 of the Planning Practice Guidance.	GVA on behalf of the Homes and Communities Agency (HCA)
13213	Comm	The HCA is the government's housing, land and regeneration agency. It has a direct interest in York being a landowner of circa one-third of the York Central site (allocation ST5) and an active partner in the York Central Partnership (YCP). YCP has submitted separate representations through its planning consultant, Arup, and the HCA supports the comments made. The HCA submits the representations as a landowner and partner with a keen interest in ensuring the deliverability of the York Central site through the Local Plan. It considers York Central vital to the success of the Local Plan as it will provide a significant proportion of housing and office space required to support the city's strategic aims.	GVA on behalf of the Homes and Communities Agency (HCA)
13228	Comm	The need for increased housing, industrial and green spaces is accepted - there needs to be social and self build housing within the plan; current road infrastructure is inadequate and will not cope with proposed development; A1237 needs to be dualled along its entire length; A1079/A64 junction is a bottleneck - A64 needs to be dualled northwards from the A1237 junction to reduce holiday traffic pressure.	
13232	Comm	Takes issue with the fact that the type of housing to be built has not been specified. Wants affordable 2/3/4 bedroom semi-detached housing for couples and families, not cramped terraces, luxury flats or student housing.	
13249	Comm	I am in support of the plan but worry that schools/GPs will not be able to cope with the extra housing.	
13250	Comm	It is impossible to know what is a good decision based on this information.	
13253	Comm	It would be nice to see new homes built west of York as not many have been built in this area.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13264	Comm	Time taken from Haxby to York Rail station by bus has increased by 35-40 minutes. Feels Haxby should have a railway to compensate.	
13272	Comm	Believes a supermarket would be beneficial to Strensall.	
13274	Comm	Concerned that the Plan may not deliver the wildlife protection it purports to provide.	
13308	Comm	Concerned York does not have the infrastructure to support more houses and people. Flooding issues are a concern.	
13323	comm	Concerned about existing shortage of openspace and green space in Acomb Ward.	councillor
13333	Comm	Proposals Maps. The roads on the Local Plan Proposals Maps North and South are very pale so difficult to locate roads interested in . The City Centre Insert is larger scale and clearer.	
13341	Comm	Feels the plan is piecemeal and not bold enough to be a vision. Tthe whole city needs a strong vision, presumption of development inside the ring road with support services and green space. Outside the city space should be better protected as it is not the city and will otherwise become suburban sprawl. Wants to know where new city parks will be especially for the developments proposed with over 1,000 houses.	
13356	Comm	Comment requests the following requirements across all sites: ample green space and tree planting; green energy production with solar panels on roofing; encourage green roofs/solar on business properties. Think Green!	
13357	Comm	Plan should have had a preface of its aims and objective, plus details of the effects of its implementation on the sub-structure (roads, schools, services etc). Also, better plans with roads marked. Without this is it difficult to constructively comment. Queries the Plan's delivery of affordable homes and appropriate employment. Notes the importance of getting ST5 (York Central) 'right'.	
13361	Comm	York needs more affordable and social housing that is appropriate for families with young children with safe play areas and appropriate rubbish storage. Somewhere to hang laundry without being an eyesore for other residents in private property.	
13369	Comm	Concerned about number of rough sleepers. Asks what provision there is for rough sleepers and what effort is being made to stop the problem evolving.	
13373	Comm	Supports building housing in general but it is essential that the necessary infrastructure is also provided - schools, hospital, GPs and transport. As a Wheldrake resident they are concerned about school places in particular as class sizes are already too big.	



Pre-Publication Draft Local Plan (2018) summary of consultation responses

13375	Comm	States plans for affordable housing are inadequate and unlikely to come to fruition. Annoyed at paying for the GL Hearn report and then ignoring the advice, also annoyed at long time scales and the Strensall Barracks being included when its future has not been finalised. Generally wants the process to be speeded up as the delays are causing people to leave York and harming the city.	
13381	Comm	Concerned there won't be any affordable housing, there will be little or no social housing and that the proposed sites will not come forward quickly enough to meet the urgent housing need. Concerned by the impact that closure of Imphal Barracks will have on jobs. Concerned that council rejected consultants advice that they paid for. Worried about implications development has for flood management. Worried that development will not provide additional parking required for residents.	
13387	Comm	The entire process has taken too long and reflects the desire of special interests to insist the one area or another is more special than the next and is therefore spared from development. Local politicians have indulged. York needs more housing, as with the country, this should be a priority. If the process is taken out of York's hands and by central government those involved should be ashamed. The approach is far too timid.	
13446	Comm	Sees a desperate need for social housing as a benefits advisor for Age UK York and a mediator with York Family Mediation, and requests a good proportion of new housing should be social. Affordable housing and privately rented is not appropriate for many.	
13447	Comm	Comments on lack of provisions for social, part-buy or affordable housing. Waiting lists for social housing are long and essential workers cannot afford to live in York.	
13477	Comm	Would like to see greater provision of social and affordable housing in the city; joined up thinking applied to sites, particularly the Castle / Piccadilly area as piecemeal redevelopment of the city centre is no good; pedestrians, cyclists and public transport be prioritised.	
13489	Comm	Plan does not provide enough affordable housing. Traffic must meet air quality standards. Ouse bridge should be closed for tourism.	
13498	Comm	Many of York's green areas and parks would be more attractive to residents if they had more benches and children's play areas.	
13505	Comm	Pleads for more affordable and social housing to be built, over and above what is stated in the plan.	
13508	Comm	The plan should provide enough social and affordable housing.	
13513	Comm	In the context of an ageing population and people with bowel/bladder issues mentions the importance of accessible, clean public toilets. Absence of such facilities makes these groups anxious to go out and can lead to isolation / ill-health.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13520	Comm	Generally agrees with the Background and Vision section of the Plan especially regarding the green belt.	Strensall with Towthorpe Neighbourhood Plan Steering Group
13535	Comm	Important the plan is finalised and implemented after so many false starts. Focus needs to be on affordable housing, asks if council can fund housing itself or does it have to find partners. Suggests that however unpopular it may be worth considering building on the green belt.	
13584	Comm	The draft Plan sets out the vision for York district until 2032/33 with the exception of the Green Belt boundaries which will endure up to 2037/38 and outlines how sustainable development will be delivered. The Plan forms a complete suite of local policies therefore it directly addresses many aspects of the strategies laid out in the SEP. The Plan supports the protection of areas of York's historic character, open countryside and landscape value which provide leisure and recreational value for York and the wider City Region. This supports the SEP objectives for good/inclusive growth and will support delivering sustainable, mixed communities.	West Yorkshire Combined Authority
13587	Comm	Request to amend green belt boundary/site status - re Body Fix Transformation Centre, Clifton Gate Business Park. Requests 'leisure' designation (non green belt) on a par with other leisure businesses (names ROKO). Further comments that Clifton Gate Business Park should be given additional status in the Local Plan.	Body Fix Transformation Centre
13605	Comm	Holgate and Acomb are going to take the brunt of building and cars, the air pollution will double so save Severus Hill/Carlton Tavern/Manor School - keep the greenery. Make the University house all its students and put a ceiling on rents, ban all cars from entering the Bar Walls - lets keep York green and clean air.	
13609	Comm	Broadly agree with the strategies and policies in the Heritage Section of the Plan but concerned that the Acomb Village conservation area and Area of Archaeological Importance are not mentioned either in the Local Plan or Heritage Topic Paper	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13609	Comm	<p>A neighbourhood forum has been set up for Acomb and Westfield and a plan developed to create policies to conserve, maintain and enhance the heritage in the area. There is a rich tapestry of buildings, streetscapes and features that survive today that give Acomb Village a special character and uniqueness. It contains one of only five protected Areas of Archaeological Importance in England. A 2013 CYC historic character assessment survey was carried out in Westfield and North Acomb that noted an unusually high number of listed buildings, survival of the medieval village plan and areas of archaeological and conservation importance. The survey made a number of recommendations - these should be incorporated within the Plan and the significant heritage Acomb centre should be included in the Heritage Topic Paper.</p> <p>Please note also that non-designated heritage assets do not have to be on the local list in order to be protected within NPPF.</p>	
13609	Comm	<p>Green space is critical to the dense urban fabric of cities such as York. Acomb in particular has a low quota of green space to population and housing development now surrounds the original village since WWII and there are ward concerns relating to the provision for and wellbeing of young people and families. Would recommend policies to discourage housing developments in Acomb, Holgate and Westfield that target green undeveloped land rather than brownfield sites. Retention of views of green spaces, wildlife corridors, green lungs, play areas/amenities and natural open space for exercise and wellbeing. Would recommend the Plan should strategically encourage CYC to work with community action groups/neighbourhood forums proactively and strategically to identify and shape areas for development in line with the Locality Act. Also recommend as there are no parks/play areas/natural green spaces in Boroughbridge Road/Beckfield Lane area of Acomb - Acomb Park could provide this vital amenity whilst allowing housing on other parts of the site - it should be protected as a 'designated open amenity site'.</p>	
13609	Comm	<p>Consultation - Note in the Council Plan 'a council that listens to residents - to ensure it delivers the services they want and works in partnership with communities'.</p> <p>Many residents are concerned that the increased development and economic pressures increasingly affecting the communities across the City. The number of active community action groups attests to the need for CYC to be more strategic/proactive in consultation within areas (ref: Localism Act) to allow local communities to be involved in local decision making. Would recommend advance consultation and transparency of data/research and development partnerships should be built into all Local Plan policies. Councillors and local neighbourhood forums/parish committees should be consulted as to the most effective way to do this.</p>	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13610	Comm	In April 2017 the Lord mayor declared York the UK's first Human Rights City - all parties have signed up to this vision. The rights to education, housing, health and social care a decent standard of living and equality and non-discrimination. Currently the Plan does not make reference to the human rights status of the city although several of the priority rights are central to the Local Plan. This is a missed opportunity to promote York as a human rights city. We encourage CYC to use the Plan to deliver on our priority human rights and consideration of these rights form a key reference point in making planning decisions such as the right to decent appropriate housing for residents. Reference could be made to CYCs obligations under the Human Rights Act and the Equality Act. We welcome CYCs acknowledgement of its duty towards Gypsy & Travellers residents and would encourage a more positive statement to this effect. Suggest the Plan includes a paragraph on York's Human Rights Status in the Local Strategic Context or Background. A statement confirming CYC/local Plan has considered its obligations. A public commitment to consider the impacts on the human rights in planning decisions.	York: Human Rights City
13623	Comm	Plan seems to only consider construction of homes and business premises, no provision of parks, open spaces, nature reserves, playgrounds, skateparks, BMX tracks or other facilities. For example a playing field off the A59 (ST1) that was previously designated for leisure use is now proposed for housing. Concerned about urban sprawl, things for young people to do and anti-social behaviour. Asks where jobs for new residents are coming from.	
13624	Comm	Supports smaller developments where they are extensions of existing housing areas. More housing should be affordable as people can no longer afford to live here and are moving away from communities they were born in. This can lead to isolation especially for the elderly, this will cost the council more in the long run as costs of social care and support rise when their health deteriorates. More affordable housing is needed to keep families together and allow young people to get on the property ladder at an earlier age.	
13628	Comm	Higher education - what are the predicted numbers and how is the University planning to accommodate these numbers?	Poppleton Neighbourhood Plan Committee
13628	Comm	SINC designation is only a convenient way of the City delaying building on land until the price is right. Experienced removal of all SINCS on York Business Park.	Poppleton Neighbourhood Plan Committee
13628	Comm	As the Local Plan has a reputation for not getting further than a draft, the date line of the plan needs to be flexible but there are no time dates given in the plan.	Poppleton Neighbourhood Plan Committee

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13628	Comm	Would like a sentence added at para 2.13 to reflect the historic and special character of villages.	Poppleton Neighbourhood Plan Committee
13639	Comm	Asks what where the recommendations of the planning consultants employed to help draft the plan. Asks why these were not made widely available or included as a key document in the consultation process.	
13640	Comm	Would like to be included as early as possible in potential site allocations. Planning for schools topic/background paper should be produced, expanding on evidence in Councils Infrastructure Delivery Plan, setting out need for schools in relation to housing growth, with specific numbers.	ESFA
13640	Comm	ESFA would be interested in responding to any updates to the Infrastructure Delivery Plan which will inform any CIL review. Requests to add ESFA to future CIL consultations.	ESFA
13643	Comm	No comments re SA	Cubs
13653	Comm	Need clarity regarding the plan period It should be 1st April 2017 to 31st March 2038. Given the lack of safeguarded land, the plan fails to justify the 2038 end date.	Johnson Mowat on behalf of Yorvik Homes
12487	Comm	Speed on Flaxton Road should be reduced to 50 and a cycle path built along the ring road.	
12487	Comm	Feels speed on Flaxton Rd should be reduced to 50, and a cycle path built on the ring road.	
12705	Comm	Wishes to voice support for York Civic Trust's arguments in favour of new settlements, preferably adopting the David-Rudlin style approach. This avoids death by stealth on existing settlements across the city and produces the critical mass to achieve the appropriate funding for necessary infrastructure. Lack of such an approach in the plan is disappointing.	
13285	Comm	Plan needs to include need for social housing as well as affordable housing.	
1352	comm	It is not possible to consider the suitability of the revised portfolio of sites as there is no evidence that they are deliverable or developable when considered against the definitions in national guidance. This failure to set out suitability, availability and achievability means the plan is not justified, sound nor effective. Inclusion of so many large startegic sites will cause a delay to planning and delivery.	Lichfields on behalf of Wakeford Properties
13562	Comm	Downloaded the .doc version of the comments form and found that section 3 (consent form) was missing, is concerned that other people will not have realised this and their views will be excluded as a result. Also concerned by the 10 minute time out on the web form as many people will have been caught out and then not bothered to complete it again.	
13637	Comm	CPRENY welcome CYCs ambition for all residents to have the best possible physical and mental health throughout their lives.	CPRE - North Yorkshire

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13637	Comm	Support this section with caveat that all proposed sites are supported by carefully considered master plans to ensure any environmental and landscape related impacts from proposals are sufficiently mitigated.	CPRE - North Yorkshire
13637	Comm	CPRENY fully endorsed the introductory paragraphs to Section 8: Place making, Heritage, Design and Culture. Especially the sentence ' successful place making is a creative, practical and continual process. It is underpinned by a holistic approach to community wellbeing that embraces health, economy, culture and the environment'.	CPRE - North Yorkshire
1675	comm	In the 'About the Plan' section, the plan period should be clarified to "1st April 2017 to 31st March 2038" to avoid confusion. It is unclear in paragraph 1.34 and 4.2 which jobs forecast are being referred to. Para 2.5 should be revised to reference that the sufficient sites are being identified that the start of the plan period and clarify the plan period. For the avoidance of doubt, the housing figure plus backlog should be referenced and therefore 867 dpa should actually be stated as 923 dpa. There is potential for the plan to increase affordability issues by not locating development in the main urban area.	Johnson Mowat on behalf of Taylor Wimpey
1901	Comm	Queries impact of 3000+ homes at Kirk Hamerton (Hambleton District), and whether the DTC has been fulfilled re cumulative impact of sites to the north of York on the A19.	
3245	Comm	States that unless major investment in the city's infrastructure including roads, utilities and hospitals is made prior to development tourists and new businesses will choose to avoid the city. Larger developments around the city will become commuter towns. Capacity of the train station should be increased before the arrival of HS2. Ring road upgrade is listed as 'long term', if this means 2027/28 this is unacceptable and should be challenged. In Policy DM1 figure 15.1 the times shown appear to be average but do not state start or finish points which would indicate the longer times taken to travel the most used sections of the ring road have been diluted by including journeys covering the full length of the northern section of the ring road.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

4200	Comm	Wishes to highlight misleading information: 1) the comments form states that comments made previously will be taken into consideration but having spoken to somebody on the phone was told this was not the case, local councillors have also urged residents to repeat their comments as previous comments do no count. It appears the 'Preferred Sites Consultation Statement' only reflects comments made at the most recent consultation. Figures will be skewed as there will be many people who did not respond on this occasion as the comments form suggests they do not need to. 2) Page 50 - point x 'Provide highway access via Moor Lane from the west, connecting with the B13363 Wigginton Road' This statement clearly indicates there is to be a new access road to site ST9 directly from the B1363, having enquired about this by phone and at a drop in event they were told this is not the case and the statement was acknowledged as misleading. The only access to the west is to be via Moor Lane into the village. Many other people had understood from the information provided that there was going to be a direct road, therefore avoiding a considerable amount of extra traffic passing through the village, adding to the already troublesome congestion. The outcome of this error could be that a number of people did not make comments regarding their concerns around congestion, vehicle emissions and impact on the village as they thought there would be a new road diverting the traffic. The outcome will have been a skew towards understating objections to the site ST9.	
5689	Comm	Supports greenfield housing in settlements rather than urban extensions. Concerned that the allocations will not meet future housing demand and that the brownfield sites are not available in the plan period due to contamination.	
71	Comm	Higher education - what are the predicted numbers and how is the University planning to accommodate these numbers?	Poppleton Neighbourhood Plan Committee
71	Comm	SINC designation is only a convenient way of the City delaying building on land until the price is right. Experienced removal of all SINCs on York Business Park.	Poppleton Neighbourhood Plan Committee
71	Comm	As the Local Plan has a reputation for not getting further than a draft, the date line of the plan needs to be flexible but there are no time dates given in the plan.	Poppleton Neighbourhood Plan Committee
71	Comm	Would like a sentence added at para 2.13 to reflect the historic and special character of villages.	Poppleton Neighbourhood Plan Committee

Pre-Publication Draft Local Plan (2018) summary of consultation responses

NDM 4	Comm	Concerned about the number of dwellings proposed for the area along the A59 and the B1224 to the west of York (York Central). Doesn't include the 3000 houses proposed by Harrogate council at Cattal which could affect transport coming into York from the west.	
NDM 4	Comm	Inadequate number of new open space proposals for plan in comparison to developments. None in area one. Need green open space with development.	
NDM 5	Comm	Suggests using small local contractors for work, prioritising brownfield sites before green field and avoiding mass builds of similar houses. A1237 is at capacity and needs developing before houses are built.	
NDM1	Comm	It would be wonderful to give views, however everything in this pamphlet is quite incomprehensible.	
NDM2	Comm	Pointless to comment as the result of consultation is inevitable.	
NDM4	Comm	Only 2 proposals for new open space for the overall plan of York, which is inadequate for the number of developments, and none are in Area 1. We need open space as well as development.	
NDM5	Comm	The council should use small local contractors to carry out works, Also supports brownfield development in priority t Greenfield. Notes that A1237 is at capacity and would need remediation before further homes are built.	
11	Comm	The document focuses very much on the city itself with less mention of the more rural parts of the authority that more closely border NYCC.	North Yorkshire County Council
11	Comm	There do not appear to be any significant cross boundary issues in relation to biodiversity. Opportunities for partnership working exist in terms of the enhancement for biodiversity.	North Yorkshire County Council
11	Comm	York is an important driver for growth both within the York, North Yorkshire and East Riding LEP area and the Leeds City Region. It is important that the City has a robust and high quality Local Plan in place that best enables it to unlock economic growth and prosperity for the benefit of its communities and those of its wider hinterland.	North Yorkshire County Council
11285	Comm	No objections to the Local Plan, no doubt all service requirements have been analysed (water, drainage, gas, electricity). Prefer no further development beyond the ring road.	
3	Obj	It would make the document easier to navigate if there was an individual section in the plan, headed for each site allocation, also with associated references in the list of contents.	Environment Agency
3	Obj	The assessment of potential impacts upon groundwater quality and quantity should form part of Objective 10 'Improve water efficiency and quality'. It is unclear whether this is the case [in the SA]. It would be good to see the importance of the Sherwood Sandstone Principal Aquifer recognised [in the baseline assessment for geology].	Environment Agency
42	Obj	There does not appear to be a policy regarding development in the Lower Derwent Valley or an ambition to draw up a Lower Derwent Valley SPD. The Trust would like to see such a policy and SPD.	Yorkshire Wildlife Trust



Pre-Publication Draft Local Plan (2018) summary of consultation responses

63	Obj	Haxby Town Council is experiencing cutbacks in services provided by CYC for the maintenance of the village.	Haxby Town Council
71	Obj	All large housing developments proposed in the Plan (including S1 and S2) will have a major impact on the primary and secondary schools. Local Plan incorrectly refers to Manor School - it has been Manor Academy for four years.	Nether Poppleton Parish Council
71	Obj	Most of the area surrounding University of York is already at high levels of student accommodation. Where will further accommodation be built? How does this release accommodation in the City? Already significant numbers of offices have been converted into student accommodation in the centre of the city.	Nether Poppleton Parish Council
71	Obj	No indication of further building or expansion of either York College or Askham Bryan College where large new premises have been built.	Nether Poppleton Parish Council
71	Obj	Standing traffic and its impact on air quality in many areas of the city is a major issue. Building more houses that have to use the existing road network will exacerbate the issues. The Parish Council is particularly concerned about Boroughbridge Road, Low Poppleton Lane, Great North Way and Millfield Lane.	Nether Poppleton Parish Council
78	Obj	All large housing developments proposed in the Plan (including S1 and S2) will have a major impact on the primary and secondary schools. Local Plan incorrectly refers to Manor School - it has been Manor Academy for four years.	Upper Poppleton Parish Council
78	Obj	Most of the area surrounding University of York is already at high levels of student accommodation. Where will further accommodation be built? How does this release accommodation in the City? Already significant numbers of offices have been converted into student accommodation in the centre of the city.	Upper Poppleton Parish Council
78	Obj	No indication of further building or expansion of either York College or Askham Bryan College where large new premises have been built.	Upper Poppleton Parish Council
78	Obj	Standing traffic and its impact on air quality in many areas of the city is a major issue. Building more houses that have to use the existing road network will exacerbate the issues. The Parish Council is particularly concerned about Boroughbridge Road, Low Poppleton Lane, Great North Way and Millfield Lane.	Upper Poppleton Parish Council

Pre-Publication Draft Local Plan (2018) summary of consultation responses

187	Obj	The Chamber is extremely disappointed that this stage of the Consultation does not appear to advance the progress of the Local Plan and the concerns it expressed in its previous representation in September 2016 about the under provision of housing and employment land, and the negative impacts this will have on the City's longer term economic growth, have not been addressed. The Local Plan fails the test of soundness. The Chamber is concerned that the Plan is not being positively prepared as there is inadequate provision for housing and employment land, it will not be effective as it will not meet the development needs of the city, it makes no provision for safeguarded land and it will not be consistent with national policy as it will not enable the delivery of sustainable development.	York and North Yorkshire Chamber of Commerce
187	Obj	The Chamber is concerned that the Plan does not present a positive or ambitious response to the challenges set out in the Background chapter. The City's economy continues to do well but is facing considerable challenges in the years ahead. The Plan fails to properly address these in a joined-up way. The failure to adequately provide for the housing and employment needs will force people out of the City to find housing elsewhere and will stifle job growth. More importantly the significant funding for infrastructure that could be forthcoming for (sic.) [from] if the full development needs of the City were to be accommodated will not be realised. The Document could be shortened by including some policies (for example Policies in the Health and Well being section which are aspirational and do not relate directly to land use) in supplementary documents. There should be a summary / explanatory chapter at the beginning of the Plan explaining how the policies will be used in determining planning applications.	
191	Obj	Wheatlands Woodland should not be designated as a SLI. It is not open to the public and is an isolated commercial tree plantation.	
220	obj	More emphasis should be placed on the importance of the Racecourse in the Local Plan and to supporting its local economic contribution through allowing the ability to evolve and adapt.	
262	Obj	Local Strategic Context. An additional paragraph is needed indicating that York is the UK's first Human Rights City, and confirming that the principles of the Universal Declaration of Human Rights underpin the plan.	York Travellers Trust
544	Obj	The evidence base which should support the local plan is not easy to find on the website - there is no single list and it appears that some documents are missing or out of date.	
1238	Obj	Concerned more housing will cause gridlocked roads, strain on schools and NHS.	
1256	Obj	Roads into York may not be able to cope with extra traffic, each site should assess transport demand. Concerned about resulting environmental damage, congestion and air quality which has not been addressed. Haxby station should be reopened.	
1466	Obj	Some of the commentary in the plan has become outdated and should be reviewed.	Network Rail

Pre-Publication Draft Local Plan (2018) summary of consultation responses

1498	Obj	allocated strategic sites have not been assessment against reasonable alternatives.	Lichfields on behalf of Bellway Homes
2412	Obj	Notes contradictions across the document - deprivation stats within the spatial portrait are conflicting (para 1.24 vs para 1.31) re deprivation indices. Rep further queries Plan's approach to reducing congestion and air pollution.	
4039	Obj	Concerned about transport infrastructure.	
4754	Obj	The Local Plan does not set sufficient weight to protect these natural habitats - this is against paragraph 113 of the NPPF.	
5381	Obj	Infrastructure is already overstretched, drainage is an issue, the health centre is full - all inadequate to cope.	
5410	Obj	Plan has far too houses planned, 3000 short of what government estimates and 4000 short of what is needed. Extra housing growth should be in green areas and not flats.	
9208	obj	Consultation documents and evidence base online are not accessible to everyone and should be made more available for people with bad connections to the internet. Do not consider the evidence base underpinning the plan to be accurate and is of poor quality.	
12252	Obj	Objects to local plan as feels it is not suitable for the 'greenest city in the North', and does not fulfil One Planet Council aspirations in terms of environmental sustainability. Higher levels of development must have zero carbon measures, nature conservation, traffic reduction and excellent public transport. Study should be done to understand level of development city can cope with environmentally. Questions housing density's ability to reduce walking distances and ensure public transport provision is viable. York should stick to carbon reduction policy. Without action emissions will rise, planning needs to be done in accordance with housing for air quality improvement. Flooding is set to increase, should avoid building on flood plains.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

12765	Obj	Disappointed at the overall proposals - the document is full of laudable aspirations, but totally devoid of details and practical solutions as to how they should be met. The controlling political group have long opposed the original proposals but the current proposals are piecemeal and have no coherent long term vision. It proposes minimal green belt development, relying on building on industrial land and school grounds which have become available. Two large sites are proposed in the Green Belt, away from existing transport corridors. Within the villages within the York Green Belt, there has been great opposition to development in the Green Belt. The underlying strategy appears to be to concentrate housing development in the existing main built up part of the City and not in outlying villages. However, improving the infrastructure of existing peripheral settlements and building additional housing would seem a better solution than the creation of new settlements ST14 and ST15. All new development has, and will continue to, result in additional road traffic. Brownfield developments will only add to congestion and no details are given on how these will be achieved.	
13003	Obj	Mitigation of flooding and air quality through creating more green urban space and planting is needed. The Plan does not address these essential planning details. The 'ambition' of the Council to create space for this is underwhelming. To create more green spaces in the urban environment the Local Plan should seek to propose land swaps with land placed more in rural communities.	Rachael Maskell MP
13003	Obj	The density of housing and development planned runs the real risks of exacerbating the air quality challenges in York. More work is essential to demonstrate beyond doubt that air quality will not worsen under the Plan. Mitigation of flooding and air quality through creating more green urban space and planting is needed. The Plan does not address these essential planning details.	Rachael Maskell MP
13025	Obj	Ambiguity between national legislation and the Local Plan. Concerns re transparency of financial issues related to the viability of development. Council should ensure that a financial viability assessment report is made available for the developments within the local plan and be open to public scrutiny. At present, it is a challenging environment for groups seeking to make a case for community-led and other affordable housing developments such as self build.	Integrated Built Environment Ltd
13030	Obj	The representor's concerns set out in its previous representations apply equally to the Draft Local Plan in the absence of any significant changes to the plan and its evidence base to correct the points of unsoundness which have been highlighted. The representor's comments have not been taken into account and no effort has been made to amend the plan or update the evidence base to address these comments and the critical points of soundness raised. This further representation report complements and should be read alongside the representor's representations to the Preferred Sites Consultation.	Turley representing Gallagher Estates

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13030	Obj	<p>The report highlights the following deficiencies in the Draft Local Plan which, individually and collectively, result in the plan being unsound and not legally compliant in its drafted form:</p> <ul style="list-style-type: none"> <li>• A failure to undertake a proper analysis of different spatial options for meeting the development needs of York and instead appraising individual sites against narrow, environmentally focused criteria with no consideration as to where development will need to be directed to in order to achieve the optimum social, environmental and economic outcomes;</li> <li>• An inconsistency between the spatial distribution of allocated sites as proposed and the selected preferred spatial distribution tested through the 2013 Sustainability Appraisal process and determined to represent the most sustainable approach to growth;</li> <li>• The absence of a comprehensive Green Belt review;</li> <li>• Procedural deficiencies in the Sustainability Appraisal Process;</li> </ul>	Turley representing Gallagher Estates
13030	Obj	<ul style="list-style-type: none"> <li>• A need to plan for a higher level of housing development than proposed in order to meet the full objectively assessed need for housing over the plan period;</li> <li>• A need to identify significantly more land for release from the Green Belt to meet the need for housing development over the plan period and to ensure the Green Belt can endure beyond this;</li> <li>• Deficiencies in the heritage and landscape evidential basis for the selection of sites for allocation in the Local Plan;</li> <li>• A failure to have regard to the guidance in paragraphs 84 and 85 of the NPPF in appraising sites for allocation and definition of the Green Belt in York;</li> </ul>	Turley representing Gallagher Estates
13030	Obj	<p>Whilst the representor welcomes the Council's efforts to progress the York Local Plan, as a general comment it wishes to place on record its dissatisfaction with the manner in which the Local Authority has managed this process. A proper understanding of how the Council has arrived at the current Local Plan can only be gained through a review of dated evidence which continues to be relied upon as the evidential basis for the current iteration of the Local Plan. The original body of evidence published by the Council has been subject to updates as part of the process but most documents have never been replaced or superseded. It is very difficult to fully understand how York has arrived at its draft Local Plan given the manner in which the evidence base is presented. It is not acceptable to continue to rely on dated evidence and subject this to partial updates through additional layers of assessment and reappraisal in an effort to ensure this remains fit for purpose. Rather there comes a point in this process where that evidence loses its relevance as circumstances have changed substantially and so must be subject to a fundamental review and representation.</p>	Turley representing Gallagher Estates

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13030	Obj	<p>This is a critical point for the soundness and the legal compliance of the Local Plan. As part of the next stage of consultation on the Local Plan, it is important that a single suite of evidential documents is published by the Council which collectively provide the Local Plan's evidence base. <b>The representation has highlighted a number of deficiencies in the Local Plan which, individually and collectively, render the plan unsound and legally deficient in its current form. There are a combination of flaws in the Local Plan's evidence base, procedural deficiencies in the plan's appraisal of site options and a fundamental inconsistency with the selection spatial strategy for York as reflected in the Draft Local Plan (2013) and fully tested through a Sustainability Appraisal process.</b></p>	Turley representing Gallagher Estates
13030	Obj	<p>The representor's view is that as part of the new Local Plan, a review of the spatial distribution strategy should have been undertaken to address a number of key sustainability issues which could be positively addressed by ensuring that the spatial strategy considers social, economic and environmental matters in a balanced manner. Maximising socio-economic benefit – Section 4.4 of the Sustainability Appraisal identifies that whilst there has been a general reduction in deprivation across York there remain notable pockets of deprivation which should be tackled and is identified as a key sustainability issue for the Local Plan. The location of new housing within or close to these areas of deprivation would bring substantial social benefit which should be considered against any environmental impact. The ward of Westfield is adjacent to the ward which contains Land at North Field and is currently identified as being within the top 20% of deprived wards in the UK.</p>	Turley representing Gallagher Estates
13030	Obj	<p>The representor has significant concerns with regards to the process for identifying and selecting the reasonable alternatives to deliver the revised housing demand as set out in the Draft Local Plan. Not all of the proposed housing allocations selected or rejected by the new Local Plan (reasonable alternatives) have been appraised using the same methodology and evidence base (and therefore the same level of detail) as deployed in the Preferred Sites consultation paper (2016). This flaw in the methodology is a breach of the requirements of the SEA Directive and Planning Practice Guidance. To rectify this deficiency the City of York Council must undertake a complete reappraise all of the reasonable alternatives considered or rejected through the Local Plan process (including those up to the aborted Local Plan) utilising the same methodology and consult upon the final proposed allocations. These procedural deficiencies mean that the Council has failed to follow due process in undertaking SA of the Local Plan. They render the plan unsound and does not meet the relevant legal obligations.</p>	Turley representing Gallagher Estates

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13030	Obj	The SHLAA (2017) states the site fails criteria 1 as it is within the historic setting and character area.	Turley representing Gallagher Estates
13099	obj	The number of housing allocations is inadequate to meet anticipated housing needs.	O'Neills Associates on behalf of Galtrees Garden Village Development Company
13182	Obj	It is considered that the Plan can be made sound subject to making reservations to the issues outlined within the representor's representations.	Barton Wilmore on Behalf of Barratt and David Wilson Homes
13256	Obj	Comments on making use of brownfield sites and empty buildings. Concerned with how York's infrastructure will cope and over population of city.	
13323	obj	Do not consider accurate representation of deficit in Acomb ward if loss of openspace at Manor School, which is still represented in the evidence base. Openspace deficit is under represented.	councillor
13338	Obj	Concern over air quality. The air quality in York is now very poor. Need for better cycle paths. Must plan for better please.	
13405	Obj	Demand a proper Local Plan. Need more facts to help formulate responses. CYC has wasted tax payers money on expert advice which the Council has then ignored. The Tories and Lib Dems hired an expensive team of planning consultants which they ignored the advice of & rejected recommendations about the amount of affordable housing needed. The Council knows their Plan will probably be rejected, which will cause more delays & Whitehall Bureaucrats wasting more money on consultation.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13408	obj	<p>Assume that ST8 would score worse than alternatives due to gap to Huntington. Do not accept conclusion of SA that this site is most appropriate option.</p> <p>Consider that the SA does not evaluate equally the reasonable alternatives identified between Appendix H and Appendix I. Furthermore, it does not present alternative strategic sites in Appendix I which makes comparison of allocated sites to reasonable alternatives impossible. It is not clear why sites have scored the scores they have between the annexes. Not able to undertake meaningful comparisons as a result. The SA does not offer reasoning as to how conclusions were reached in selecting sites for allocation (or choosing not to) and therefore renders the assessment outside the scope of the applicable regulations. Importance of this point confirmed through high Court judgement <i>Save Historic Newmarket Ltd and others vs Forest Heath District Council and the SoS for CLG</i>.</p>	
13426	Obj	<p>Object to green field sites close to existing sports and leisure facilities being used for housing when a practical, community friendly solution would be to retain this type of site as playing fields or green space.</p>	
13463	Obj	<p>No vehicle access to Rawcliffe School. Concerned about child safety, proposed development (gym) has already been turned down due to safety issues.</p>	
13487	Obj	<p>Concern about Clifford's Tower Motte. The space at the base of the four steps removed from green space land. Open space land cannot be apportioned, removed or its status altered without following the terms of the 1972 Local Government Act. Section 123 on disposal of land. It should be returned to open space land.</p>	Cllr Hayes
13513	Obj	<p>Transport Topic Paper does not mention active travel nor does it mention air pollution. The Plan states aspirations to deal with air quality but does not have active measures to counter increases in congestion that motor vehicles cause. The lack of action leaves the council vulnerable to either a) imposition of measures from central government or b) legal action on behalf of residents who have suffered / died prematurely due to illegal pollution levels. Increasing active travel will benefit public health, combatting isolation and acting as a great social leveller. Despite claims to the contrary the Transport Topic Paper does seem to exist in a vacuum, the modelling work does not include pedestrians or cyclists and York Cycle Campaign has raised serious concerns as to the consequences this will have for policy / infrastructure investment. Goes into detail listing more ambitious policies the council should be pursuing in order to promote cycling e.g. mandatory shower facilities and secure bike parking in work places of more than 10 people, car-sharing, green travel plans and so on. No discussion of the impact technology (both communication technology and e-bikes) will have on future travel patterns. Mentions the importance of adapted bikes for the disabled and how they are to be accommodated by council policy. Asks if the transport model includes public transport, and if emergency</p>	
13525	Obj	<p>Employment sites are unlikely to provide the numbers of jobs shown.</p>	



Pre-Publication Draft Local Plan (2018) summary of consultation responses

13550	Obj	Concern over Paragraph 1.54 which references 'Green Wedges'. Figure 3.1 and 3.2 seems to suggest that all the agricultural land inside the York area that is not included within the green wedges is open for development for housing. Agricultural land, woodland and the natural environment should be preserved as Green Belt and not be developed. Much better use can be made of brownfield land. The policy of building houses needs to end. Low cost apartments are more affordable and should be higher density.	
13552	Obj	Our City publication. The map of York is divided into pie sections, this gives an incomplete understanding for some residents.	
13593	Obj	Feels measures to improve air quality are a glaring omission from the plan. Asks what the legal limits are, how often York exceeds these, whether the impacts new developments will have has been modelled and how this will impact on the health of the people of York. Also asks how the city has been future-proofed, what can be done to transform transport policy, promote e-bikes and how self-driving cars will impact the city.	
13628	Obj	All large housing developments proposed in the Plan (including S1 and S2) will have a major impact on the primary and secondary schools. Local Plan incorrectly refers to Manor School - it has been Manor Academy for four years.	Poppleton Neighbourhood Plan Committee
13628	Obj	Most of the area surrounding University of York is already at high levels of student accommodation. Where will further accommodation be built? How does this release accommodation in the City? Already significant numbers of offices have been converted into student accommodation in the centre of the city.	Poppleton Neighbourhood Plan Committee
13628	Obj	No indication of further building or expansion of either York College or Askham Bryan College where large new premises have been built.	Poppleton Neighbourhood Plan Committee
13628	Obj	Standing traffic and its impact on air quality in many areas of the city is a major issue. Building more houses that have to use the existing road network will exacerbate the issues. The Parish Council is particularly concerned about Boroughbridge Road, Low Poppleton Lane, Great North Way and Millfield Lane.	Poppleton Neighbourhood Plan Committee

Pre-Publication Draft Local Plan (2018) summary of consultation responses

13635	Obj	<p>The Draft Local Plan is unsound because it fails to allocate enough land to meet the existing and future employment land requirements of the City. Market evidence indicates there is strong and unfulfilled demand for employment floorspace in the District.</p> <p>There is a need for employment land to meet the requirements of small indigenous businesses for reasonably cheap premises that are priced out of the urban area by demand for residential land. There is a need to have land available to meet potential major inward investment requirements. The cautious approach of the Draft Plan fails to meet this objective.</p>	O'Neill Associates on behalf of Malton Road Developments Ltd.
13642	Obj	Object to the allotments in Rufforth being designated as 'green space'	
13642	Obj	Object to the allotments in Rufforth being designated as 'green space'	
13030	Obj	<p><u>Appendix 5: SA objective 1: To meet the diverse housing needs of the population in a sustainable way:</u> Land at North Field is able to accommodate up to 1,000 new high quality private and affordable homes on the edge of the residential settlement of Acomb. In addition to a range of facilities within 1km of the site, Acomb District Centre is located within walking distance of the site which has additional services and facilities. Overall it is considered that Land at North Field will have a significant Positive effect on this SA objective. <b>SA objective 2: Improve the health and well-being of Yorks population.</b> A strong green infrastructure network will be provided within the site to provide recreational opportunities and opportunities for cycling and walking. Residents will also have access to health facilities within Acomb which are accessible by public transportation. The land is largely greenfield with no contamination sources identified at this time. Some temporary negative effects may occur during the construction phase these will be largely mitigated through the use of a Construction and Environmental Management Plan (CEMP). Overall it is considered that Land at North Field will have a long-term Positive effect on this SA objective.</p>	Turley representing Gallagher Estates

13030	Obj	<p><u>Appendix 5 Continued: SA Objective 3: Improve education, skills development and training for an effective workforce.</u> The indicative masterplan provided within the Vision Framework provides an indicative location of a primary school for residents. In addition there are primary and secondary schools within walking distance of the site in addition to nursery provision within Acomb. There will therefore be a strong education provision as a result of the Proposed Development and overall considered that Land at North Field will have a significant Positive effect on this SA objective. <b>SA Objective 4: Create jobs and deliver growth of a sustainable, low carbon and inclusive economy.</b> The economic benefits of new housing are well known with Land at North Field able to generate a significant number of jobs during the construction and operational phases of development. There will be a range of direct and indirect economic benefits to the local community and businesses through the construction of new housing and the increased spending from residents. Overall it is considered that Land at North Field will have a long-term Positive effect on this SA objective.</p>	
13030	Obj	<p><u>Appendix 5 Continued : SA Objective 5: Help deliver equality and access to all.</u> Land at North Field is in close proximity to the ward of Westfield which is within the top 20% deprived wards in the country. Locating a significant residential development within close proximity to this ward is likely to have significant regeneration benefits to tackle the deprivation issues. Overall it is considered that Land at North Field will have a significant Positive effect on this SA objective. <b>SA Objective 6: Reduce the need to travel and deliver a sustainable integrated transport network.</b> As stated within the previously submitted representations, locating residential development on the West of York is likely to reduce cross commuting (and therefore congestion and air pollution) given that 29% of commuting from York is to Harrogate and Leeds which is on the West of the City. Furthermore the West of the City benefits from significantly better transport connections. There are several opportunities to introduce cycling and pedestrian links from the site to the wider area along with the provision of other sustainable transport options including the nearby Park and Ride facility at Poppleton Bar and regular local bus services within 500m walk of the site. On this basis it is considered that Land at North Field will have a significant Positive effect on this SA objective.</p>	Turley representing Gallagher Estates

13030	Obj	<p><u>Appendix 5 Continued</u> : <b>SA Objective 7: To minimise greenhouse gases that cause climate change and deliver a managed response to its effects.</b> The development will be designed to meet national and local sustainable design and construction policy which will prioritise a ‘fabric first’ approach to construction that will focus on reducing energy use through efficiency measures and fabric. In addition, the sustainable location of the site in combination with the opportunities for walking, cycling and the nearby Park and Ride will encourage a reduction in private care use and associated emissions. It is acknowledged however that the construction of the new dwellings will result in carbon emissions. Overall therefore it is considered that Land at North Field will have negative short term impacts and Positive long term impacts on this SA objective.</p>	Turley representing Gallagher Estates
13030	Obj	<p><u>Appendix 5 SA of Land at North Field Continued:</u> <b>SA Objective 8: Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.</b> An ecological survey indicates that the site is of low ecological value with the potential for birds and bats although this is considered to be of low to negligible probability. There are no statutory or non-statutory ecologically sensitive sites on or adjacent to the site. The proposed multi-functional Green Infrastructure network in combination with the use of Sustainable Urban Drainage Systems provides the opportunity to maintain and potentially enhance the biodiversity performance. Overall therefore it is considered that Land at North Field will have a Positive long term impact on this SA objective. <b>SA Objective 9: Use land resources efficiently and safeguard their quality.</b> Land at North Field is currently used for agricultural purposes and given the high grade land around York a similar sustainability performance to SS9 and SS10 is assumed. <b>SA Objective 10: Improve water efficiency and quality.</b> All additional residential development will increase water consumption within the City of York however Land at North Field will contain a number of water efficiency measures to reduce consumption where practicable. Overall therefore it is assumed that there will be a negative effect on this SA objective.</p>	Turley representing Gallagher Estates

13030	Obj	<p><u>Appendix 5 SA of Land at North Field Continued</u>: <b>SA objective 11: Reduce Waste generation and increase level of reuse and recycling.</b> During the operational and construction phases waste would be generated despite the use of mitigation measures and therefore a negative impact is assumed on this SA objective. <b>SA Objective 12: Improve air quality.</b> The site is not within an AQMA but will generate traffic as a result residential development which, in turn, is likely to impact upon air quality despite the use of mitigation measures. A range of sustainable transportation options will be provided to residents which will include walking, cycling and the nearby Park and Ride. The potential for a reduction in cross-commuting through York by locating residential development closer to key destination such as Leeds and Harrogate is also significant and therefore it has been assumed that there will be a impact on this SA objective. <b>SA Objective 13: Minimise flood risk and reduce the impact of flooding to people and property in York.</b> The site predominantly within Flood Zone 1 and therefore at low risk of flooding. The use of SuDS will be a priority for the site will be a priority. Overall therefore it is assumed that there will be no significant negative or Positive effect upon this SA Objective.</p>	Turley representing Gallagher Estates
13030	Obj	<p><u>Appendix 5 Continued</u>: <b>SA Objective 14: Conserve or enhance York’s historic environment, cultural heritage, character and setting.</b> There are no designed heritage assets within or close to the proposed development that would be negatively affected by the proposals. An archaeological desktop study indicates that archaeology may be present but is unlikely to be of national importance nor preclude the site from development. Overall it is considered that Land at North Field will have no significant negative or Positive impact upon this SA objective. <b>SA Objective 15: Protect and enhance York’s natural and built landscape.</b> The site does not have any specific landscape protection and is not identified as being within an AONB or Special Landscape Area. High quality design will be a focus for the proposals which will minimise any impact upon the landscape. Of critical importance to the suitability of the site is the absence of any views of the York Minster from this side of the city thereby removing any potential impact. This is of particular importance given the function of Green Belt within York is to protect the views of the York Minster. Overall therefore it is considered that there will be a minor negative or neutral impact upon the landscape from the proposed development.</p>	Turley representing Gallagher Estates
13617	Obj	<p>Open Spaces: Acomb page 15 of main document - objection to the map - consider Acomb Ings between the river and East Coast main Line to be open space. This is not shown on the map. It is accessible from the north and provides a tranquil area for recreation from the business park and nearby housing.</p>	
1675	obj	<p>The ‘Delivery and Monitoring Tables’ to the rear of the Plan contain no requirement to maintain a 5 year supply and what actions are to be taken in the event of a housing delivery failure. This is a failure of the Plan as drafted.</p>	Johnson Mowat on behalf of Taylor Wimpey

Pre-Publication Draft Local Plan (2018) summary of consultation responses

71	Obj	All large housing developments proposed in the Plan (including S1 and S2) will have a major impact on the primary and secondary schools. Local Plan incorrectly refers to Manor School - it has been Manor Academy for four years.	Poppleton Neighbourhood Plan Committee
71	Obj	Most of the area surrounding University of York is already at high levels of student accommodation. Where will further accommodation be built? How does this release accommodation in the City? Already significant numbers of offices have been converted into student accommodation in the centre of the city.	Poppleton Neighbourhood Plan Committee
71	Obj	No indication of further building or expansion of either York College or Askham Bryan College where large new premises have been built.	Poppleton Neighbourhood Plan Committee
71	Obj	Standing traffic and its impact on air quality in many areas of the city is a major issue. Building more houses that have to use the existing road network will exacerbate the issues. The Parish Council is particularly concerned about Boroughbridge Road, Low Poppleton Lane, Great North Way and Millfield Lane.	Poppleton Neighbourhood Plan Committee
9883	Obj	Site ref 883. Wheatlands Woodland, Poppleton. 2ha. There is no evidence for the designation of the site as a Site of Local Interest due to Nature Conservation or as Existing Open Space. Both of these designations should be removed. The Woodland is private land and there is no public access to the site. Technical documents: Ecology Report.	O'Neill Associates on behalf of SBO Land Ltd
12765	Obj (Cont	Unless a development group / corporation is set up to oversee the comprehensive plan (taking into account schools, healthcare, transport etc, there will be no overall structure.	
3	Supp	On the whole, the Environment Agency's comments from previous consultations have been taken on board and the EA find the content of the plan positive. The section on green infrastructure is good and recognises the dual of both green open spaces and mitigation of current and future flood risk, as sustainable drainage systems (SuDS) or flood storage, can be achieved.	Environment Agency
3	Supp	Development of brownfield land being assessed as positive is an appropriate assessment. Risks associated with land contamination will be assessed and remediated as part of the development of brownfield land can also be considered positive. The sustainability appraisal report demonstrating that Catchment Abstraction Management and water resources have been considered is supported.	Environment Agency
9	Supp	Broadly supports the Local Plan approach and its policies.	Selby District Council
10	Supp	Welcomes the opportunity to comment on the draft plan, which has been based on ongoing co-operation between the two authorities throughout the plan making process.	East Riding of Yorkshire Council

Pre-Publication Draft Local Plan (2018) summary of consultation responses

42	Supp	Habitat Regulation Assessment. Agreement with the Overall Screening Conclusion that there are likely significant effects for policies SS19, E18, H59, SS18 and SS13.	Yorkshire Wildlife Trust
57	Supp	Strongly supports the draft Local Plan (2017) as it affects Copmanthorpe Parish. In particular, support is given to the establishment of a Green Belt surrounding the village . Especially along the existing boundary to the west of the village, and the designation of land on Tadcaster Road Link and on Old Moor Lane for housing.	Copmanthorpe Parish Council
74	Supp	This is a well thought out document balancing employment needs for the city whilst protecting the setting of the historic city and rural character of the surrounding villages.	Rufforth with Knapton Parish Council
79	Supp	The Parish Council recognises that great efforts have been made to ensure that much greater emphasis is placed upon Brownfield sites.	Wheldrake Parish Council
98	Supp	Supports the principle of an adopted Plan, acknowledging the uncertainty and missed opportunities resulting from no plan being in place. Supports the emerging draft, which embodies the wishes of the citizens of York and their elected representatives. Please add reference to the York Central Historic Core Conservation Area Appraisal.	York Civic Trust
244	Supp	Support the Designer Outlet being identified in the Key Diagram as part of the built up area.	NTR Planning obo McArthur Glen, Aviva Investors & York Designer Outlet
244	Supp	In 'Section 1: Background', support the recognition in paragraph 1.38 that York Designer Outlet fulfils a specialist retail role, and that it helps York meet its role as a regional centre (paras 1.39). Paragraph 1.40 seeks to 'restrict further developments in out of centre locations' - whilst no comments are made on this issue, it should not be seen to inappropriately restrict appropriate expansion of the York Designer Outlet.	NTR Planning obo McArthur Glen, Aviva Investors & York Designer Outlet
244	Supp	Support the recognition that York Designer Outlet is a commercial location to be safeguarded (paragraph 2.2) and confirms that it is an appropriate location for additional retail provision supported by its owners and investors. Its future expansion will create more jobs . As visitor numbers in the City Centre continue to increase, so will the importance of Park & Ride. (Para 2.15)	NTR Planning obo McArthur Glen, Aviva Investors & York Designer Outlet
494	Supp	Support the designation of the land behind Southfields Road/Princess Road as a SINC site and the other SLI sites.	
504	Supp	General support for the sites included in the Plan.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

1732	supp	Support for the economy. Support for Local Plan to support existing businesses as contributors to the local economy and work closely with them to understand their changing needs.	
2356	Supp	Pleased that the plan meets housing and employment need. Fully supports the proposals regarding the Parish of Rufforth with Knapton and the views of the Rufforth with Knapton Neighbourhood Planning Group.	
2416	Supp	It's good to see that concrete policies are finally appearing and the principles expressed are obviously sound and sensible.	
2765	Supp	Fully agree with the Local Plan vision and polices especially with regard to the redevelopment of brownfield land and vacant buildings, protection of green spaces and flood plains.	
3428	Supp	Support the inclusion of all brownfield sites and the 'brownfield first' approach.	Skelton Village Action Group
4039	Supp	Supports allocation of green space.	
5307	Supp	Supports provided that cycle and pedestrian paths and extra park and rides are provided.	
6355	Supp	Support paragraph 1.57, recognising the contribution Askham Bryan College makes to economic growth, creating a quality educational offer within York.	Directions Planning Consultancy OBO Askham Bryan College
9432	Supp	Supports projected housing numbers and mix of housing types and new revision of plan.	
9773	Supp	Generally feel that this is a much more sensible plan than the previous versions.	
12830	Supp	Supports provided that cycle and pedestrian paths and extra park and rides are provided.	
13213	Supp	The HCA supports the intent of Policies HW1 to HW7	GVA on behalf of the Homes and Communities Agency (HCA)
13279	Supp	Hopes infrastructure has been considered alongside local plan schemes.	
13289	Supp	No Comment.	
13304	Supp	General support	
13323	supp	Support the need to deliver homes and use of brownfield sites. Local Plan can ensure holistic approach to improving health and well-being of populations to ensure actions match rhetoric.	councillor
13323	supp	Support an evidenced approach to understanding openspace	councillor
13371	Supp	Welcomes the plans focus on developing brown field land and the MOD sites. Welcomes the preservation of green belt sites.	



Pre-Publication Draft Local Plan (2018) summary of consultation responses

13408	supp	Support paras 2.8 and 2.9 in relation to the historic built environment. Support this part of the plan that seeks to protect the built environment and particularly its strong urban form and compactness.	
13515	Supp	Welcomes the prospect of having an accepted local plan with defined Green Belt boundary as it will hopefully prevent speculative development. Particularly pleased that Kanpton Lane Woodlands, north of Kanpton Lane and south of Lochrin Place, is designated as both green belt and a site for nature conservation.	
13643	Supp	No comments	Cubs
13643	Supp	No comments	Cubs
13466	Supp	Supports local plan in general and designation of new open space OS10 as it will create a buffer for nearby SSSI whilst also maintaining agricultural use in a managed conservation area without public access.	
13637	Supp	CPRENY welcomes the recognition that green corridors linking the urban centre and countryside are vital in maintaining York's green infrastructure network and character and environmental quality of the city. It is important the Local Plan establishes what land is green belt and sets firm boundaries preserving the special character and setting of York.	CPRE - North Yorkshire
13513	Comm	Unhappy with OurCity promotional material, cover does not stand out and is not easy to understand the importance of the plan or its contents. Unhappy with OurCity as it does not provide enough detail to respond in an informed way and it is not easily comparable to the Pre Publication Draft. Each area in OurCity should have had a corresponding URL so it was easier to find information. There should have been an interactive website that was easier to understand and navigate. Given how long it takes to understand all of the documents the drop-in events were scheduled too early, there should have been more events in the final week before the deadline so people could check their understanding. Many of the documents available online were of such large file sizes that they were unable to be opened. It is difficult to know which documents to read and the titles do not help. The website should have suggestions where people can choose a topic they are interested in and how much time they have available, the website then tells you which pages of which documents to read and which form to fill in. Responding to the consultation properly would require help groups that allow people to work together, these could be staffed mainly by volunteers. Documents need to be numbered (Transport Topic Paper does not have page numbers) and easier to understand with less jargon.	
<b>Comments unrelated to the Local Plan</b>			
1939		Objection to plans to build a retirement development on land on Common Road Opposite Dunnington Sports Club. This site is not within the draft Local Plan.	

Pre-Publication Draft Local Plan (2018) summary of consultation responses

2844		Objection to plans to build a retirement development on land on Common Road Opposite Dunnington Sports Club. This site is not within the draft Local Plan.	
5450		No comments	
10818		Asks about planning application (12/02755/FUL) for a permanent caravan park at Holme Lea / Elvington and what agreement has been reached.	
12595		Blank entry	
13299		Please remove Uber from the city	