

Local Plan Pre- Publication Draft 2018 Summary of Consultation Responses

ID	Policy	Obj/Supp/Comm	Summary	Respondent (name of individuals removed)
Policy CC1				
42	CC1	Comm	Climate change is one of the most important issues leading to the loss of biodiversity. Support for all efforts to reduce the emissions of gases which increase global warming. The policy should specify specific high standards for housing developments. The phrase ' <i>New buildings must achieve a reasonable reduction in carbon emissions of at least 28%</i> ' is not a meaningful phrase or target and is unlikely to lead to energy efficient developments.	Yorkshire Wildlife Trust
238	CC1	Comm	General support for the thrust of the policy. Applicants are required to do no more than "consider" the impact of any scheme upon the various elements set out in the seven Criteria of the Policy. In order to provide a framework to enable the decision-maker to determine how they ought to react to a development proposal, the wording of the sentence before the Criteria needs to be more positive. Amend third paragraph to read:-" <i>Applications will be supported where they can demonstrate that they would not have an adverse impact upon...</i> "	Historic England
386	CC1	Comm	For new developments, the cost of installing ground source heat systems is significantly lower if done at the time of groundworks when other utilities are installed. We therefore believe all new developments should assess and factor in the whole life cost of installing ground source heat pumps and higher levels of insulation against the requirement for linking to district heating networks. Where ground source heat provision would be more cost effective, this should be installed.	York Green Party
540	CC1	Comm	The phrase 'New buildings must achieve a reasonable reduction in carbon emissions of at least 20%' needs to be clarified. 'Reasonable' by reference to what?	Jennifer Hubbard Town Planning Consultant
68	CC1	Obj	The following comments are related to the City of York Council Renewable Energy Study (Final Report) by AMEC Environmental & Infrastructure Ltd dated 2014 and its consideration in the context of the pre-publication draft Local Plan. Object to all potential wind farms as they are inappropriate within the Vale of York. Solar panels should not be placed on agricultural land, rather they should be placed on the roofs of industrial premises and incorporated in roofing of new build residential properties.	Kexby Parish Council

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434	CC1	Obj	Sustainability and Energy Statements were submitted for ST1 in support of the application. There was no requirement for the production of an Energy Masterplan and it should be noted that was not and is not a requirement that should be applied to British Sugar. The policy does not make it clear what the 28% reduction relates to and should be deleted. Deleted wording suggested.	Rapleys LLP on behalf of British Sugar PLC
1675i	CC1	Obj	We object to this policy being applied to strategic housing sits. The Policy and supporting text is unclear as to whether or not this applies to major residential schemes. The text in the Peter Brett Associates Viability Report suggests it does not apply – Para 5.4.7 informs no costs have been allocated to this requirement as the Carbon Trust noted further work is required.	Johnson Mowat on behalf of Taylor Wimpey
1705	CC1	Obj	Policy is not consistent with current Government advice. The requirement for a 28% reduction in carbon emissions goes beyond the target emission rate of Part L of the Building Regulations.	Gladman Developments
4355	CC1	Obj	Objects to requirement for reduction in carbon emissions of at least 28%, unclear as to the justification for this figure, how it is expected to be delivered or monitored and why other legislation such as Building Regulations cannot adequately control this issue. Also object to requirement for strategic sites to produce energy masterplans, this is disproportionate and impractical for the three sites that compromise the ST14 Terry's Extension Sites. This should only apply to strategic sites >5ha.	ELG Planning on behalf of Henry Boot Developments Ltd
12659	CC1	Obj	28% reduction in carbon emissions is too inflexible. Additional detail is sought as to how this should be balanced against the overall viability of the scheme. The policy also requires strategic sites to produce energy masterplans to ensure that the most appropriate low carbon renewable and energy efficient technologies are deployed at each site. Further clarity is needed regarding how this tool would be flexible enough for sites with long build out where energy technologies might be substantially different at the end of the build out period.	Arup on behalf of the York Central Partnership
13003	CC1	Obj	York should be aiming to become a zero-carbon city, which will require it to find ways of generating its own renewable energy and sites need to be set aside to enable this to happen	Rachael Maskell MP

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13103	CC1	Obj	Object to policy being applied to strategic sites. Unclear whether this applies to major residential schemes. The viability report suggests it does not apply. Needs clarity.	Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees
13104	CC1	Obj	Object to policy being applied to strategic sites. Unclear whether this applies to major residential schemes. The viability report suggests it does not apply. Needs clarity.	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
13213	CC1	Obj	The policy requires a reduction in carbon reductions of 28%. This is considered to be an inflexible and onerous position, which does not allow for site specific matters to be taken into account and could render development unviable. In addition, the policy also requires strategic sites to produce energy masterplans to identify the most appropriate renewable and energy efficient technologies but further clarity is required as to how major sites with longer-term build-outs can plan for changing and new technologies during this period.	GVA on behalf of the Homes and Communities Agency (HCA)
12659	CC1	Supp	Supportive in principle of this policy	Arup on behalf of the York Central Partnership
13520	CC1	Supp	Policy is supported to ensure that any development is constructed in a sustainable manner.	Strensall with Towthorpe Neighbourhood Plan Steering Group

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Policy CC2				
13003	CC2	Comm	Not only should all new build seek to draw minimal energy, but through micro-generation, buildings have a real opportunity to feed into the grid, whereas open spaces can also be used for renewable energy generation.	Rachael Maskell MP
3	CC2	Obj	Recommend that a policy is inserted that ensures the requirements of the Water Framework Directive are adhered to, where appropriate. Recommend that a point is included within Policy DP2 or Policy CC2 to ensure that appropriate water efficiency measures are secured for developments.	Environment Agency
238	CC2	Obj	Whilst it may be possible to achieve BREEAM “very good” and “excellent” for some conversions, there may be historic properties where it is impossible to attain these standards without compromising elements which contribute to their significance. The Policy should recognise that these standards would only be a requirement where they can be achieved in a manner consistent with the appropriate conservation of that asset. Policy CC2, conversion of existing buildings add to the end:- “.. “excellent” unless it can be demonstrated that this would harm the significance of a designated heritage asset”.	Historic England
540	CC2	Obj	Whilst the objective of this policy is laudable, the policy itself is extremely prescriptive and unlikely to be deliverable particularly in so far as it applies to small scale developments where the requirements are likely to be impractical and/or uneconomic. There are no gas supplies to many parts of the rural areas of the District.	Jennifer Hubbard Town Planning Consultant
866	CC2	Obj	Suggests it is unreasonable to require non-residential buildings over 100m2 to achieve BREEAM 'Excellent' as only 10% of these buildings achieve this. Neighbouring districts are seeking 'Very Good'.	Northminster Business Park
1338	CC2	Obj	Object to the requirement for all new non-residential buildings to achieve BREEAM "Excellent", this would be prohibitively expensive and does not take account of site-specific constraints.	Indigo Planning on behalf of Wyevale Garden Centres

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ID	Policy	Obj/Supp/Comm	Summary	Respondent (name of individuals removed)
1674	CC2	Obj	<p>It is unreasonable to require non-residential buildings over 100m2 to achieve BREEAM 'Excellent'. Currently, only 10% of UK new non-domestic buildings achieve at least 'Excellent' due to how difficult it is to achieve this level. Even 'Very Good' is hard to achieve, which is evidenced by how only 25% of new non-domestic buildings achieve this rating or higher. It is therefore considered unreasonable to require all non-domestic buildings over 100m2 to score at least 70% on the BREEAM rating. Requiring such a high rating will act as a barrier to investment within the district, especially as neighbouring districts are currently seeking 'Very Good'. We would therefore urge the Council to reconsider this requirement given the additional costs it will add to development. Especially for small scale developments which will simply become unviable.</p>	<p>Directions Planning Consultancy Ltd on behalf of William Birch & Sons</p>
1675i	CC2	Obj	<p>We object to the 19% reduction requirement as it goes beyond building regulations with justification. Building Regulations are constantly being updated and improved and there is not case for York to run a parallel process.</p> <p>The Peter Brett Report Table 5.12 informs this policy increases the cost of building a typical 3-bed dwelling by £812 which is presumably over and above the cost of a standard home built to current Building Regulations requirements.</p>	<p>Johnson Mowat on behalf of Taylor Wimpey</p>
1705	CC2	Obj	<p>Policy is not consistent with current Government advice. The requirement for at least a 19% reduction in the Dwelling Emission Rate compared to the Target Emission Rate and a water consumption rate of 110 l per person per day.</p>	<p>Gladman Developments</p>
4355	CC2	Obj	<p>Object to the absence of justification in the policy or supporting text to support the requirement that all new residential buildings should achieve at least a 19% reduction in Dwelling Emission Rate compared to Target Emissions Rate. It is also unclear how this target relates to the target in policy CC1 for all new buildings to achieve a 28% reduction in carbon emissions.</p>	<p>ELG Planning on behalf of Henry Boot Developments Ltd</p>

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12659	CC2	Obj	Concern that a number of the policy requirements relate to aligning with BREEAM regulations. Clarity is sought on how this policy contains sufficient flexibility to allow the emerging BREEAM regulations to be incorporated. Recommend that flexibility is incorporated into the policy to enable the policy requirements for a 19% reduction in Dwelling Emission Rate, water consumption rate of 110 litres per person per day, BREEAM Excellent target or BREEAM Communities Assessment to be general guideline rather than a prescribed requirement.	Arup on behalf of the York Central Partnership
13103	CC2	Obj	Object to the 15% reduction requirement as it goes beyond building regs.	Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees
13104	CC2	Obj	Object to the 15% reduction requirement as it goes beyond building regs.	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
13182	CC2	Obj	These requirements are already governed with Building Regulations and therefore should not be included as a planning policy requirement within the Local Plan. The policy should be deleted as it is not justified and fails to meet the tests of soundness.	Barton Wilmore on Behalf of Barratt and David Wilson Homes
13213	CC2	Obj	The policy appears too restrictive and inflexible given the evolving nature of sustainable technologies in construction and development.	GVA on behalf of the Homes and Communities Agency (HCA)
3	CC2	Supp	Pleased to see that water efficiency guidelines have been followed and the consideration of the Humber River Basin Management Plan. EA would encourage any projects that would help improve the status of a water body.	Environment Agency

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ID	Policy	Obj/Supp/Comm	Summary	Respondent (name of individuals removed)
386	CC2	Supp	Fully support policies which require maximum permissible uplift in energy efficiency and renewable generation. We believe there should be a commitment to update all targets on an annual basis in line with national and international policies and scientific evidence. 11.16 Water consumption is an important consideration – reference should be made here to rainwater and greywater recycling having dual benefit of reducing consumption of clean water supplies and reducing discharge rates to watercourses. Such systems are particularly appropriate for larger developments such as student accommodation, factories, supermarkets, offices etc.	York Green Party
12659	CC2	Supp	Generally support this policy.	Arup on behalf of the York Central Partnership
13520	CC2	Supp	Policy is supported to ensure the sustainable quality of individual buildings within a development.	Strensall with Towthorpe Neighbourhood Plan Steering Group
13637i	CC2	Supp	CPRENY welcomes the inclusion of the Climate Change Section - to reach the Country's targets to reduce our CO2 it is important that LPAs plan for climate change in their development plans. Energy efficient designs should therefore be included within all new proposed development and thus Policy CC2 is welcomed.	CPRE - North Yorkshire

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Policy CC3				
456	CC3	Comm	Heat distribution networks can work in some circumstances but they are in many ways less important than thinking about energy use reduction and sources of energy/ primary energy.	
9208	CC3	Comm	Clarification is required as to how the policy influences existing properties/residents.	
13213	CC3	Comm	The policy requires all new development to connect to a decentralised energy network unless it is unfeasible to do so. Further clarity must be given as to the impact of this policy on the viability of development in the city so as not to become a redundant policy. The HCA, as part of YCP, would welcome further discussion with CYC on the potential impact on York Central.	GVA on behalf of the Homes and Communities Agency (HCA)
540	CC3	Obj	Whilst the objective of this policy is laudable, the policy itself is extremely prescriptive and unlikely to be deliverable particularly in so far as it applies to small scale developments where the requirements are likely to be impractical and/or uneconomic. There are no gas supplies to many parts of the rural areas of the District.	Jennifer Hubbard Town Planning Consultant
1675i	CC3	Obj	We object to this policy. According to para 11.33 informs this policy applies to residential schemes in excess of 300 dwellings. This would cover all proposed Strategic Housing sites. We object on the basis that energy efficiencies are already sought under Policy CC2 and as demonstrated in Table 5.12 of the viability report the cost of Policy CC3 would be and extra £3,396 to a typical 3 bed house. The Plan contains no good examples of where such a system has been successfully installed on a large housing site. The installation will impact upon the delivery of other elements of social infrastructure.	Johnson Mowat on behalf of Taylor Wimpey
1705	CC3	Obj	Policy is not consistent with current Government advice. The requirement for all new development to either connect to or be connection ready for Combined Heat and Power or District Heating systems is unjustified and unduly onerous.	Gladman Developments

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4355	CC3	Obj	Object to requirement that all new developments are required to connect to CHP2 distribution networks as there is very limited access to such networks in the city at present and limited prospect of such networks being constructed in the near future. In absence of such networks it is unreasonable and disproportionate for the council to require developers on all sites to go to the expense of undertaking relevant energy studies and making all new developments 'connection ready' whilst they will still have to provide individual facilities for each new dwelling.	ELG Planning on behalf of Henry Boot Developments Ltd
12659	CC3	Obj	Significant concerns regarding the implementation of Policy CC3. The supporting text suggests that the heat network feasibility study undertaken on behalf of the Leeds City Region for York Central is financially viable. Concern that the technical study undertaken does not have regard to the significant infrastructure costs as set out in the draft Local Plan, and note that the conclusions of the report demonstrate that a heat network would only be viable with significant public sector funding. Question the assertions in the Local Plan regarding the feasibility of a Heat Network at York Central.	Arup on behalf of the York Central Partnership
13103	CC3	Obj	Object to this policy as according to para 11.33, the 300 dwellings threshold would mean that the requirement applies to all strategic sites. The installation will impact upon the delivery of other elements of social infrastructure.	Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees
13104	CC3	Obj	Object to this policy as according to para 11.33, the 300 dwellings threshold would mean that the requirement applies to all strategic sites. The installation will impact upon the delivery of other elements of social infrastructure.	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
386	CC3	Supp	Support this policy, especially for developments that are close to the existing network at University of York (ST27 and ST4) Add: ground source heat systems may be more appropriate for smaller /less intensive development and must be assessed to decide which is most appropriate taking account location and scale of the development.	York Green Party

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13520	CC3	Supp	Policy is supported where CCHP and CHP can be provided to new and possible existing developments.	Strensall with Towthorpe Neighbourhood Plan Steering Group