

From: Isobel McGeever [imcgeever@iceniprojects.com]
Sent: 04 April 2018 16:27
To: localplan@york.gov.uk
Subject: Limetrees, Shipton Road, Clifton | York Local Plan Consultation
Attachments: 180326 Limetrees Reprs.pdf; Comments_form_FINAL (1).pdf; LIMT01_4439_SitePlan.pdf

Dear Sir/Madam,

Please find attached representations prepared in relation to the site known as Limetrees, York.

The attached documents comprise of the representations letter, location plan, and the representations form.

I would appreciate confirmation of the successful receipt of these representations.

Kind regards,
Isobel

Isobel McGeever
Assistant Planner, Planner

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City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Ms
First Name		Isobel
Last Name		McGeever
Organisation (where relevant)		Iceni Projects
Representing (if applicable)		NHS Property Services
Address – line 1		Flitcroft House
Address – line 2		114 – 116 Charing Cross Road
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		WC2H 0JR
E-mail Address		imcgeever@iceniprojects.com
Telephone Number		020 3657 5036

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

- Online via our website www.york.gov.uk/localplan.
- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please see attached representations for comments.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input type="checkbox"/>	Justified	<input type="checkbox"/>
Effective	<input type="checkbox"/>	Consistent with national policy	<input type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph
no.Policy
Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Please see attached representations letter for comments.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Please see attached representations letter for comments.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please see attached representations letter for comments.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature



Date

04/04/2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012



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Strategic Planning
West Offices,
Station Rise,
York
YO1 6GA

4th April 2018

BY EMAIL [localplan@york.gov.uk]

Dear Sir/Madam,

**CITY OF YORK PRE-SUBMISSION LOCAL PLAN CONSULTATION | LAND AT LIMETREES,
SHIPTON ROAD, CLIFTON, YO30 5RE**

We write to you on behalf of our client, NHS Property Services Limited (NHSPS), in relation to the City of York Council's Pre-submission Local Plan consultation. Our client wishes to outline the development potential of the site at Limetrees. For reference, enclosed with these representations is a Site Location Plan.

a. NHS Property Services Site Ownership

In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.

NHSPS's Property Strategy team has been supporting Clinical Commissioning Groups (CCG) and Sustainability and Transformation Plan groups to look at ways of better using the local health and public estate. This will include identifying opportunities to reconfigure the estate to better meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites emerging from this process.

By way of background, local health commissioners are currently developing a strategy for the future delivery of health services in this area. This will involve the release of certain NHSPS landholdings which are no longer required for the delivery of health services.

NHSPS is therefore promoting the site in accordance with Department of Health guidance (Health Building Note 00-08) which states "NHS PS owned sites that may become surplus to requirements should be protected by securing specific land-use policies for these sites in the relevant DPDs".

Should any part of the subject site be declared as surplus to the operational healthcare requirements of the NHS in the future (thought to be within 3 years), then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5 - 10 years.

b. Site Context

The site is located in the Clifton area of York, around 1.7km north of York City Centre. The site is currently located within the Green Belt within a finger of Green Belt land which runs into the centre of York from the North-West of the City.

At present the site consists of a few small buildings, reaching 1 – 2 storeys in height, with associated hardstanding car parking area located to the south of the site. The rest of the site to the north of the existing built form consists of open grassland with a number of trees.

The site adjoins the existing built form of Clifton to the east, whilst land to the west and south consists of sports pitches of York Sports Club.

The site covers an area of approximately 1.7ha and as previously stated is located within the Green Belt. There is a bus stop located on the eastern boundary of the site which offers services towards York City Centre, Askham Bryan, Easingwold, and Helmsley where rail services can be accessed providing services towards various destinations including Liverpool, Aberdeen and London.

c. National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) is the preeminent national policy; in law, regard must therefore be had to it. In summary, the following paragraphs of the NPPF are of particular relevance to the Local Plan making process, and should be complied with:

- a) Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. They should be consistent with the principles and policies set out in the NPPF, including the presumption in favour of sustainable development (Paragraphs 150-151).
- b) Proposed housing supply must meet evidential need for housing of all types, including a 5% buffer for five year housing targets (or 20% in cases of persistent under delivery), these targets must be deliverable. The Council must identify a supply for years 6-15 which is specific and developable (Paragraph 47).
- c) Local Plans should be aspirational but realistic. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan (Paragraph 154).
- d) Local Plans should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.
- e) There is a cross-boundary duty to co-operate, particularly with planning issues which relate to the strategic priorities. LPA's should work collaboratively with other bodies to ensure strategic priorities across local boundaries are properly co-ordinated and clearly reflected in Local Plans (Paragraph 178-179).
- f) The Inspector's primary task will be to consider the soundness of the submitted plan, this will be assessed against the following soundness criteria:
 - **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The Draft NPPF (March 2018) urges local authorities to make more land available for homes in the right places by maximising the contribution from brownfield land.

d. Overview of the City of York’s Local Plan Consultation Document in relation to the Land at Limetrees

The Publication Local Plan identifies that York aims to provide 867 dwellings per annum to meet its housing need, this equates to 17,340 dwellings over the plan period (2017 – 2037). Housing allocations to meet this target include the development of a number of ‘garden villages’ which are intended to be exemplar new sustainable communities.

Spatial Principles

The Consultation Plan also identifies that the Council have five spatial principles, these can be summarised as follows:

1. Conserving the historic and natural environment of York;
2. Promoting sustainable transport methods;
3. Preventing congestion and pollution;
4. Managing flood risk; and
5. The reuse of previously developed land will be prioritised.

The redevelopment of the site at Limetrees can be considered to be in line with the five spatial strategies. Any well-designed, modest future scheme will have no impact on the historic and natural environment of York due to its location outside the historic centre of York. Furthermore, the site’s location in close proximity to bus stops means that sustainable transport methods can easily be accessed, this in turn reduces dominance of cars and prevents congestion and pollution.

Although the site is located within Flood Zone 2, any redevelopment proposals will be supported by flood risk assessments to ensure any future uses will not be detrimentally impacted by flooding. Finally and notably, although located in the Green Belt, the site is partially previously developed. The redevelopment of the site would therefore be in line with the final spatial principle which seeks for development to be located on previously developed land to promote reuse of this type of land.

Green Belt / Open Space

The Council’s Publication document identifies that the site subject to these representations is located within an area of the Green Belt which is proposed for protection in the emerging Local Plan. The Publication Local Plan also identifies that the northern part of the site is designated as ‘existing open space’.

Policy SS2 in the emerging Plan relates specifically to the role of York’s Green Belt. The Policy states that the primary purpose of the Green Belt in York is to safeguard the setting and the special character of York. These representations set out an assessment below of how the site does not contribute to the purposes of the Green Belt and hence is a candidate for release from it.

Policy GB2 in the emerging Plan relates to development within settlements within the Green Belt. Since the site is located within the existing built confines of the City of York, this Policy can be considered to be relevant. The wording of the Policy states that planning permission for the erection of new buildings or redevelopment will only be permitted provided that:

- The proposed development is located within the built-up area of the settlement;
- The location, scale, and design would be appropriate; and

- The proposed development would constitute limited infilling and would not prejudice the purposes of the Green Belt.

NHSPS would like to support the wording of this statement as it provides some flexibility in relation to the redevelopment potential of the previously developed site at Limetrees development of which would be considered limited infilling.

Policy GI5 relates to the protection of open space and playing fields and states that development proposals will not be permitted which would harm the character or lead to the loss of open space. It is considered that although part of the site is allocated as 'existing open space', it is currently private land and thus access to this 'open space' is restricted and not publicly accessible.

Community Facilities

Policy HW1 of the emerging Plan seeks to protect existing community facilities, unless it can be a number of factors can be demonstrated. NHSPS would like to reiterate that extensive internal assessments are carried out by the CCG and the NHS property team as to when, and if, a site becomes surplus to their requirements. It will therefore have already been established that the site(s) are no longer required.

e. Housing Requirements

As previously identified, York's emerging Local Plan seeks to provide 867 new dwellings per annum, or 17,340 dwellings over the 20 year plan period. This figure directly correlates with the Council's Objectively Assessed Need (OAN) which was calculated by the Council's June 2016 Strategic Housing Market Assessment (SHMA).

It is important to note that the Government published their standardised methodology to housing needs in September 2017, published along with this was a table identifying every Council in England's housing requirement figures calculated using this standardised methodology.

York's housing requirement figure using this standardised methodology rises to an annual requirement of 1,070 dwellings or, 21,400 dwellings over the 20 year plan-period. This figure is significantly higher than the amount of dwellings the Council is seeking to plan for in its emerging Local Plan and thus if it is considered that additional housing sites are required to ensure sufficient supply then we submit these representations to put forward the site at Limetree for consideration.

f. Site Suitability / Green Belt Assessment

The site is located abutting the existing residential area of Clifton to the north of the City of York. As previously stated, part of the site consists of land containing existing built form which is located within the Green Belt. The site is located on Service 2 of the high frequency public transport corridor identified in Figure 5.3 of the consultation document. This shows that the site is extremely accessible by public transport and can be seen to be sustainably located.

As previously identified, the site is located within the Green Belt, but due to the existing built form covering part of the site, would partly represent previously developed land within the Green Belt. The Council undertook a Green Belt Study in 2003 which, assessed various parcels of Green Belt land within the district. Notwithstanding the fact that this Green Belt study is somewhat dated, the associated map identifies the site within a 'Green Wedge', but does not provide a detailed, specific assessment of the site or the surrounding land as to its contribution toward the Green Belt's purposes.

Due to the lack of assessment of the site against the Green Belt's purposes, a Green Belt Assessment is provided below to outline the development potential of the land at Limetrees. This is based on the five Green Belt purposes identified by the NPPF (Paragraph 80).

Land at Limetrees, Shipton Road, York
<i>1. to check the unrestricted sprawl of large built-up areas</i>
- The area of the Green Belt which the site is located within does not perform this function as it is surrounded by the existing built form of York to both the east and west. - Furthermore, the site already contains existing built form.
<i>2. to prevent neighbouring towns merging into one another</i>
- The site does not perform a role in separating two towns as all surrounding built form is the continuous urban development of York.
<i>3. to assist in safeguarding the countryside from encroachment</i>
- The site does not perform this role as it is bound to the east by existing built form and partly constitutes previously developed land.
<i>4. to preserve the setting and special character of historic towns</i>
- The site's location outside the historic centre of York means that it does not perform a role in preserving the setting and special character of the historic town.
<i>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land</i>
- The area of land located within the Green Belt measures around 1.7ha in size and is bounded to the east by existing built form. The site also contains existing built form, which can be classed as brownfield and which could be regenerated.

g. Sustainability

The golden thread running through the NPPF is a presumption in favour of sustainable development. This means that developments which accord with the Local Plan should be approved without delay. The three pillars of sustainability within the NPPF are identified as Social, Environmental, and Economic; the definitions of these terms and the ways the proposals on the land at Limetrees conform with these pillars are identified below.

Social

The NPPF defines socially sustainable development as those which contribute toward supporting a strong, vibrant and healthy community by providing the supply of housing required to meet the needs of present and future generations, through a high quality built environment with accessible services and support of health, social and cultural wellbeing.

The redevelopment of the land at Limetrees accords with the social pillar of sustainable development through the provision of an increased number of residential dwellings on a sustainably located site in order to help meet the Council's identified and growing need for housing. In addition to this, the site could represent the opportunity for the delivery of affordable housing towards the Council's identified need, representing a further opportunity to deliver a socially sustainable development.

Environmental

The NPPF defines environmentally sustainable development as development which contributes to protecting and enhancing the natural, built and historic environment through improving biodiversity, using natural resources prudently, and minimising waste and pollution.

A scheme at Limetrees would provide sustainably located residential dwellings within walking distance of existing services and amenities, reducing the need for future residents to travel long

distances and reducing pollution. Any redevelopment would also make use of partly previously developed land which would reduce pressure on greenfield Green Belt sites.

Economic

The NPPF defines economically sustainable development as development which contributes toward building a strong, responsive, and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation.

Redevelopment of Limetrees would accord with this pillar through the introduction of an increased number of residents into an existing urban area. These new residents will help to secure the economic viability and vitality of the existing local businesses and services through an increased customer base.

A scheme at the site would also ensure that a higher provision of land is available for a land use which is identified as being highly demanded at this point in time and in a sustainable location.

h. Summary and Conclusions

Should any part of the Limetrees site be declared as surplus to the operational healthcare requirements of the NHS in the future, then the site should be considered suitable and available for alternative use, and considered to be deliverable within the period 5- 10 years.

These representations identify the site's potential for future development, in accordance with the realignment of the Green Belt so that previously developed land is no longer included. It is evident, that the built parts of the site specifically do not perform against the purposes of the Green Belt as set out in the NPPF.

Accordingly, redevelopment of this site could provide a key contribution to York's housing need, which is currently identified as 867 dwellings per annum notwithstanding, the higher need demonstrated by the DCLG's newly published OAN figures. These representations therefore promote and identify Limetrees, as a suitable site to contribute towards these requirements.

As detailed above, it is considered that the redevelopment of Limetrees would contribute to the Council's Housing Need. This site presents an excellent opportunity for a modest, residential redevelopment on previously developed Green Belt land which is in close proximity to the City Centre and has very good public transport connections. Small scale redevelopment would ensure that the characteristics of this area are retained, without the need for significant infrastructure as the development will represent an infill scheme.

Subject to a review by NHSPS the subject site is considered available, suitable and deliverable within the 5-10 year period of the plan.

I trust that these representations provide the Planning Authority with sufficient information to consider the site for residential development within the forthcoming Local Plan.

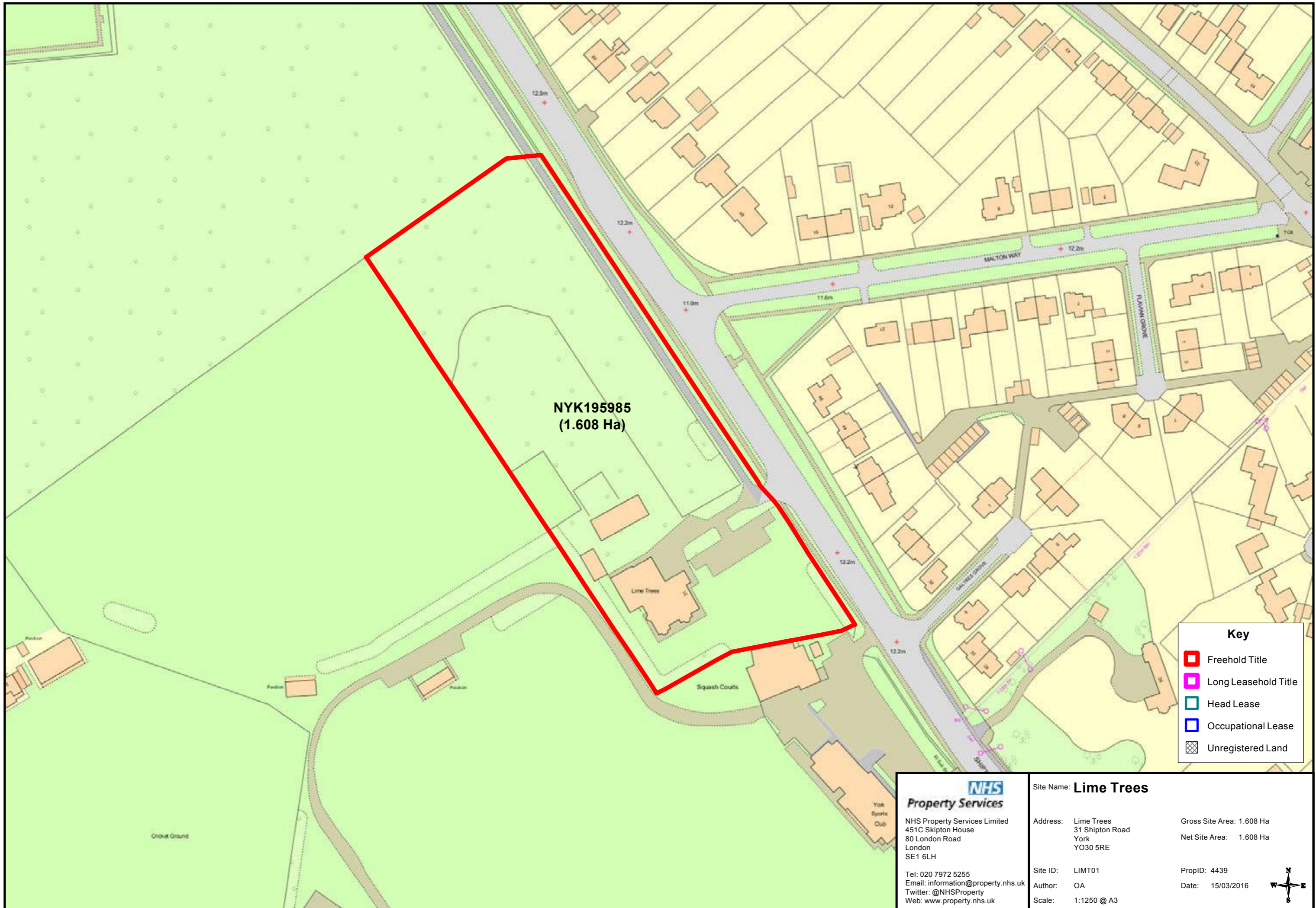
We would request to be kept informed of future stages of the Local Plan preparation. If you require any further information, please contact the undersigned (email: imcgeever@iceniprojects.com Tel: 020 3657 5036) or my colleague Luke Challenger (email: lchallenger@iceniprojects.com Tel: 0203 435 4205).

Yours sincerely,



Isobel McGeever
ASSISTANT PLANNER

Encl. Site Location Plan



**NYK195985
(1.608 Ha)**

Key

- Freehold Title
- Long Leasehold Title
- Head Lease
- Occupational Lease
- Unregistered Land

**NHS
Property Services**

NHS Property Services Limited
451C Skipton House
80 London Road
London
SE1 6LH

Tel: 020 7972 5255
Email: information@property.nhs.uk
Twitter: @NHSPROPERTY
Web: www.property.nhs.uk


Site Name: Lime Trees

Address: Lime Trees
31 Skipton Road
York
YO30 5RE

Gross Site Area: 1.608 Ha
Net Site Area: 1.608 Ha

Site ID: LIMT01
Author: OA
Scale: 1:1250 @ A3

PropID: 4439
Date: 15/03/2016



From: jadu-www@rsvm120.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 04 April 2018 16:43
To: localplan@york.gov.uk
Subject: A new Local Plan Publication Draft response form has been submitted

A new Local Plan Publication Draft response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

Web ref: 105172

Date submitted: 04/04/2018

Time submitted: 16:42:38

Thank you for submitting your Local Plan Publication Draft response form (ref: 105172, on 04/04/2018 at 16:42:38) to City of York Council.

The following is a copy of the details you included.

About your comments

Whose views on the Local Plan publication draft do your comments represent? Own comments

About you/the organisation/individual/group you're representing

Please complete in full; in order for the Inspector to consider your representations names and postal addresses must be provided.

Title: Mr

Forename: Keith

Surname: Massheder

Name of the organisation/individual/group you're representing:

Address (building name/number and street): [REDACTED]

Address (area): [REDACTED]

Address (town): [REDACTED]

Postcode: [REDACTED]

Email address: [REDACTED]

Telephone number: [REDACTED]

What are your comments about

You may complete this form more than once - you should **submit a separate form for each issue to you want to raise** relating to the Local Plan 'publication draft', the Policies Map or the Sustainability Appraisal/Strategic Environmental Assessment.

Which document do your comments relate to? Local Plan Publication Draft

Legal compliance of the document

'Legally compliant' means asking whether or not the plan has been prepared in line with statutory regulations, the duty to cooperate, and legal procedural requirements such as the Sustainability Appraisal. Details of how the plan has been prepared are set out in the Consultation Statements and Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan.

Do you consider the document is legally compliant? Yes, I consider the document to be legally compliant

Do you consider the document to comply with the Duty to Cooperate? YesCompliestoDuty

Please justify why you do/do not consider the document to be legally compliant or in compliance with the Duty to Cooperate:

As a lifelong resident of York I consider it essential that the Local Plan directly addresses the pressures of York's housing market whilst at the same time guaranteeing the protection of its greenbelt and unique natural beauty.

Overall I judge the Local Plan Publication Draft, Policies Map, Sustainability Appraisal and Strategic Environmental Assessment to be sound documents. Specifically I feel the following principles within the draft Local Plan (the Plan) are crucial for the future development of York:

1. The Plan gives the necessary protection of York's greenbelt, protecting our unique City.
2. Given that population figures are predicted to be lower than estimated by the Government, the Plan provides enough houses for the people of York.
3. From delivering roughly 500 houses per annum to nearly 1000 houses per annum I believe that

through the housing delivered under the Plan affordability can be improved in York.

I am confident that with the Plan York will be able to provide sustainable development across the City and deliver a balance between providing new homes and delivering more employment, whilst protecting the City's special character.

It is essential that the people of York retain control over this process and ultimately decide on the future of York themselves.

Whether the document is/is not 'sound'

Deciding whether you consider the document to be 'sound' means considering whether it's 'fit for purpose' and 'showing good judgement'. The inspector will use the public examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness':

- **positively prepared** - prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development
- **justified** –the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- **effective** – deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- **consistent with national policy** – enables the delivery of sustainable development in accordance with the policies in the framework

Do you consider the document to be 'sound'? Yes, I consider the document to be sound

Please indicate which of four 'tests of soundness' relate to your answer:

[Response - SoundnessYES]

Please give reasons for your answer(s):

As a lifelong resident of York I consider it essential that the Local Plan directly addresses the pressures of York's housing market whilst at the same time guaranteeing the protection of its greenbelt and unique natural beauty.

Overall I judge the Local Plan Publication Draft, Policies Map, Sustainability Appraisal and Strategic Environmental Assessment to be sound documents. Specifically I feel the following principles within the draft Local Plan (the Plan) are crucial for the future development of York:

1. The Plan gives the necessary protection of York's greenbelt, protecting our unique City.
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I am confident that with the Plan York will be able to provide sustainable development across

the City and deliver a balance between providing new homes and delivering more employment, whilst protecting the City's special character.

It is essential that the people of York retain control over this process and ultimately decide on the future of York themselves.

Which part of the document do your comments on 'soundness' relate to? Please provide a paragraph number, a policy reference or a site reference: All

Necessary changes

You can suggest any change(s) you consider necessary to make the Local Plan legally compliant or sound - you'll need to say why the modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Your suggestion should cover succinctly all the information, evidence and supporting information necessary to support/justify it. There will not normally be a subsequent opportunity to make further representations; these would only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

If you're seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination?

If you select 'No', your suggestions will still be considered by the independent planning inspector by way of written representations.

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt, to hear those who want to participate at the hearing sessions.

From: jadu-www@rsvm120.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 04 April 2018 16:46
To: localplan@york.gov.uk
Subject: A new Local Plan Publication Draft response form has been submitted

A new Local Plan Publication Draft response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

Web ref: 105173

Date submitted: 04/04/2018

Time submitted: 16:45:40

Thank you for submitting your Local Plan Publication Draft response form (ref: 105173, on 04/04/2018 at 16:45:40) to City of York Council.

The following is a copy of the details you included.

About your comments

Whose views on the Local Plan publication draft do your comments represent? Own comments

About you/the organisation/individual/group you're representing

Please complete in full; in order for the Inspector to consider your representations names and postal addresses must be provided.

Title: Mr

Forename: Keith

Surname: Massheder

Name of the organisation/individual/group you're representing:

Address (building name/number and street): [REDACTED]

Address (area): [REDACTED]

Address (town): [REDACTED]

Postcode: [REDACTED]

Email address: [REDACTED]

Telephone number: [REDACTED]

What are your comments about

You may complete this form more than once - you should **submit a separate form for each issue to you want to raise** relating to the Local Plan 'publication draft', the Policies Map or the Sustainability Appraisal/Strategic Environmental Assessment.

Which document do your comments relate to? Policies Map

Legal compliance of the document

'Legally compliant' means asking whether or not the plan has been prepared in line with statutory regulations, the duty to cooperate, and legal procedural requirements such as the Sustainability Appraisal. Details of how the plan has been prepared are set out in the Consultation Statements and Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan.

Do you consider the document is legally compliant? Yes, I consider the document to be legally compliant

Do you consider the document to comply with the Duty to Cooperate? YesCompliestoDuty

Please justify why you do/do not consider the document to be legally compliant or in compliance with the Duty to Cooperate:

As a lifelong resident of York I consider it essential that the Local Plan directly addresses the pressures of York's housing market whilst at the same time guaranteeing the protection of its greenbelt and unique natural beauty.

Overall I judge the Local Plan Publication Draft, Policies Map, Sustainability Appraisal and Strategic Environmental Assessment to be sound documents. Specifically I feel the following principles within the draft Local Plan (the Plan) are crucial for the future development of York:

1. The Plan gives the necessary protection of York's greenbelt, protecting our unique City.
2. Given that population figures are predicted to be lower than estimated by the Government, the Plan provides enough houses for the people of York.
3. From delivering roughly 500 houses per annum to nearly 1000 houses per annum I believe that

through the housing delivered under the Plan affordability can be improved in York.

I am confident that with the Plan York will be able to provide sustainable development across the City and deliver a balance between providing new homes and delivering more employment, whilst protecting the City's special character.

It is essential that the people of York retain control over this process and ultimately decide on the future of York themselves.

Whether the document is/is not 'sound'

Deciding whether you consider the document to be 'sound' means considering whether it's 'fit for purpose' and 'showing good judgement'. The inspector will use the public examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness':

- **positively prepared** - prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development
- **justified** –the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- **effective** – deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- **consistent with national policy** – enables the delivery of sustainable development in accordance with the policies in the framework

Do you consider the document to be 'sound'? Yes, I consider the document to be sound

Please indicate which of four 'tests of soundness' relate to your answer:

[Response - SoundnessYES]

Please give reasons for your answer(s):

As a lifelong resident of York I consider it essential that the Local Plan directly addresses the pressures of York's housing market whilst at the same time guaranteeing the protection of its greenbelt and unique natural beauty.

Overall I judge the Local Plan Publication Draft, Policies Map, Sustainability Appraisal and Strategic Environmental Assessment to be sound documents. Specifically I feel the following principles within the draft Local Plan (the Plan) are crucial for the future development of York:

1. The Plan gives the necessary protection of York's greenbelt, protecting our unique City.
2. Given that population figures are predicted to be lower than estimated by the Government, the Plan provides enough houses for the people of York.
3. From delivering roughly 500 houses per annum to nearly 1000 houses per annum I believe that through the housing delivered under the Plan affordability can be improved in York.

I am confident that with the Plan York will be able to provide sustainable development across

the City and deliver a balance between providing new homes and delivering more employment, whilst protecting the City's special character.

It is essential that the people of York retain control over this process and ultimately decide on the future of York themselves.

Which part of the document do your comments on 'soundness' relate to? Please provide a paragraph number, a policy reference or a site reference: All

Necessary changes

You can suggest any change(s) you consider necessary to make the Local Plan legally compliant or sound - you'll need to say why the modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Your suggestion should cover succinctly all the information, evidence and supporting information necessary to support/justify it. There will not normally be a subsequent opportunity to make further representations; these would only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

If you're seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination?

If you select 'No', your suggestions will still be considered by the independent planning inspector by way of written representations.

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt, to hear those who want to participate at the hearing sessions.

From: jadu-www@rsvm120.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 04 April 2018 16:48
To: localplan@york.gov.uk
Subject: A new Local Plan Publication Draft response form has been submitted

A new Local Plan Publication Draft response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

Web ref: 105175

Date submitted: 04/04/2018

Time submitted: 16:48:21

Thank you for submitting your Local Plan Publication Draft response form (ref: 105175, on 04/04/2018 at 16:48:21) to City of York Council.

The following is a copy of the details you included.

About your comments

Whose views on the Local Plan publication draft do your comments represent? Own comments

About you/the organisation/individual/group you're representing

Please complete in full; in order for the Inspector to consider your representations names and postal addresses must be provided.

Title: Mr

Forename: Keith

Surname: Massheder

Name of the organisation/individual/group you're representing:

Address (building name/number and street): [REDACTED]

Address (area): [REDACTED]

Address (town): [REDACTED]

Postcode: [REDACTED]

Email address: [REDACTED]

Telephone number: [REDACTED]

What are your comments about

You may complete this form more than once - you should **submit a separate form for each issue to you want to raise** relating to the Local Plan 'publication draft', the Policies Map or the Sustainability Appraisal/Strategic Environmental Assessment.

Which document do your comments relate to? Sustainability Appraisal/Strategic Environmental Assessment

Legal compliance of the document

'Legally compliant' means asking whether or not the plan has been prepared in line with statutory regulations, the duty to cooperate, and legal procedural requirements such as the Sustainability Appraisal. Details of how the plan has been prepared are set out in the Consultation Statements and Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan.

Do you consider the document is legally compliant? Yes, I consider the document to be legally compliant

Do you consider the document to comply with the Duty to Cooperate? YesCompliestoDuty

Please justify why you do/do not consider the document to be legally compliant or in compliance with the Duty to Cooperate:

As a lifelong resident of York I consider it essential that the Local Plan directly addresses the pressures of York's housing market whilst at the same time guaranteeing the protection of its greenbelt and unique natural beauty.

Overall I judge the Local Plan Publication Draft, Policies Map, Sustainability Appraisal and Strategic Environmental Assessment to be sound documents. Specifically I feel the following principles within the draft Local Plan (the Plan) are crucial for the future development of York:

1. The Plan gives the necessary protection of York's greenbelt, protecting our unique City.
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It is essential that the people of York retain control over this process and ultimately decide on the future of York themselves.

Whether the document is/is not 'sound'

Deciding whether you consider the document to be 'sound' means considering whether it's 'fit for purpose' and 'showing good judgement'. The inspector will use the public examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness':

- **positively prepared** - prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development
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- **effective** – deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- **consistent with national policy** – enables the delivery of sustainable development in accordance with the policies in the framework

Do you consider the document to be 'sound'? Yes, I consider the document to be sound

Please indicate which of four 'tests of soundness' relate to your answer:

[Response - SoundnessYES]

Please give reasons for your answer(s):

As a lifelong resident of York I consider it essential that the Local Plan directly addresses the pressures of York's housing market whilst at the same time guaranteeing the protection of its greenbelt and unique natural beauty.

Overall I judge the Local Plan Publication Draft, Policies Map, Sustainability Appraisal and Strategic Environmental Assessment to be sound documents. Specifically I feel the following principles within the draft Local Plan (the Plan) are crucial for the future development of York:

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I am confident that with the Plan York will be able to provide sustainable development across the City and deliver a balance between providing new homes and delivering more employment, whilst protecting the City's special character.

It is essential that the people of York retain control over this process and ultimately decide on the future of York themselves.

Which part of the document do your comments on 'soundness' relate to? Please provide a paragraph number, a policy reference or a site reference: All

Necessary changes

You can suggest any change(s) you consider necessary to make the Local Plan legally compliant or sound - you'll need to say why the modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Your suggestion should cover succinctly all the information, evidence and supporting information necessary to support/justify it. There will not normally be a subsequent opportunity to make further representations; these would only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

If you're seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination?

If you select 'No', your suggestions will still be considered by the independent planning inspector by way of written representations.

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt, to hear those who want to participate at the hearing sessions.

From: Matthew Stocks [matthew.stocks@indigoplanning.com]
Sent: 04 April 2018 16:53
To: localplan@york.gov.uk
Subject: Representations to the Local Plan Publication Draft Regulation 19 Consultation (February 2018) - Novus Investment Ltd
Attachments: Comments_form_FINAL.PDF; let.024..AC Representations - Novus Investments Ltd.pdf
Importance: High

Dear Sir/ Madam

Please find enclosed representations to the Local Plan Publication Draft Regulation 19 Consultation (February 2018), submitted by Indigo Planning on behalf of Novus Investment Ltd.

Please could you confirm receipt?

Kind regards,

Matthew Stocks

Matthew Stocks | Associate

T: 0113 380 0270 **M:** 07469 157 291 **E:** matthew.stocks@indigoplanning.com



RTPI Planning Consultancy of the Year 2017

Toronto Square, Toronto St, Leeds, LS1 2HJ
T: 0113 380 0270 **W:** www.indigoplanning.com



This e-mail (including any attachments) is intended only for the recipient(s) named above.
It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person.
If you are not a named recipient, please contact the sender and delete the e-mail from the system.

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Matthew
Last Name		Stocks
Organisation (where relevant)	Novus Investments Ltd	Indigo Planning
Representing (if applicable)		Novus Investments Ltd
Address – line 1	C/o Agent	Toronto Square
Address – line 2		Leeds
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		LS1 2HJ
E-mail Address		matthew.stocks@indigoplanning.com
Telephone Number		0113 3800270

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

- Online via our website www.york.gov.uk/localplan.
- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

We do not wish to comment.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input type="checkbox"/>	Justified	<input type="checkbox"/>
Effective	<input type="checkbox"/>	Consistent with national policy	<input type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph
no.Policy
Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Please see supporting letter

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

N/a

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Should the draft allocation H53 be revoked or amended in any way prior to submission, we would wish to participate at the oral part of the examination, in order to be able to challenge such an amendment and fully justify our client's case.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

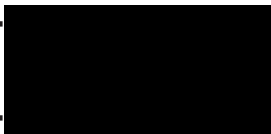
Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature  Date

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

FREEPOST RTEG-TYYU-KLTZ Local Plan
City of York Council
West Offices
Station Rise
York
YO1 6GA

By email
localplan@york.gov.uk
let.024..AC.05260017

4 April 2018

Dear Sir/ Madam

**REPRESENTATIONS TO THE LOCAL PLAN PUBLICATION DRAFT
REGULATION 19 CONSULTATION (FEBRUARY 2018)
SITE H53 – LAND AT KNAPTON VILLAGE**

These representations are submitted by Indigo Planning on behalf of Novus Investment Ltd (Novus) in respect of the City of York Council (CYC) Local Plan Publication Draft Regulation 19 Consultation (February 2019) (LPPD).

Novus Investments Ltd is the owner of land at the junction of Main Street and Back Lane, Knapton YO26 6QG, which is identified in the LPPD as 'Land at Knapton Village' (Allocation Ref: H53). The site is a proposed housing allocation under Policy H1, Table 5.1.

The site has been proposed to be allocated for housing in previous iterations of the emerging Local Plan. Indigo Planning previously submitted representations to the Call for Sites exercise (October 2012), the Local Plan Preferred Options (July 2013), the Preferred Sites Consultation (September 2016), and the Pre-Publication Draft Consultation (September 2017), supporting and further justifying the proposed allocation of the site for residential use.

Novus support the continued proposed allocation of the site for residential use, the estimated phasing for delivery of short term (years 1 to 5), and the proposed estimated yield of four dwellings. This figure has been arrived at following site assessments undertaken in support of a previous planning application at the site (LPA Ref: 16/00542/FUL). Whilst the planning application was refused, this was on the basis of the site's location in the Green Belt. The determination of the application crucially confirmed that there are no technical matters which would render the site unsuitable for residential use.

Novus therefore agree with the Council's assessment of the site and conclusions that it is suitable for housing. This is on the basis of the following:

- The site is well contained with long-established boundaries on three sides;
- The development of the site will provide a defensible Green Belt boundary to

the east;

- The development of the site will provide limited infill to the existing settlement form;
- There are no nature designations affecting the site;
- Whilst a greenfield site, it does not provide any purpose;
- The site is well served by existing local road infrastructure and key services;
- It is relatively flat and level and has no technical constraints to development; and
- The landowner is willing to develop the site.

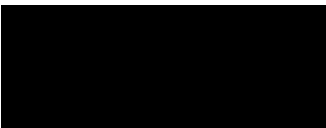
On this basis of the proposed allocation of the site, Novus consider the Local Plan is sound.

This is also consistent with the draft allocation of the site for housing in the emerging Rufforth With Knapton Neighbourhood Plan (Allocated Site Ref: RK H3), for which the Submission Version is currently subject to consultation, following the submission of the final draft by Rufforth with Knapton Parish Council to City of York Council on 21 February 2018.

The government is currently consulting on proposed changes to the National Planning Policy Framework (NPPF). The driving force behind these changes is the desire to deliver more houses. Paragraph 135 states that amendments to the Green Belt boundaries can be made through local policies, including neighbourhood plans. As such, the timing of the adoption of the Local Plan and Neighbourhood Plan do not need to be aligned, and the allocation of the site can come forward in either document.

In summary, the Local Plan is sound on the basis of the proposed allocation of the site for housing, and the proposed allocation (Allocation Ref: H53) is justified in the context of paragraph 182 of the NPPF.

Yours sincerely

A black rectangular box redacting the signature of Matthew Stocks.

Matthew Stocks

Enc: Completed Comments Form

From: JOY, Matthew [matthew.joy@parliament.uk]
Sent: 04 April 2018 16:56
To: localplan@york.gov.uk
Attachments: Submission Regulation 19 Consultation - Julian Sturdy.docx; Julian Sturdy MP Comments_form_FINAL.docx

Good afternoon,

Please find attached Julian Sturdy MP's Local Plan consultation submission and additional document.

Kind regards

Matt



Matt Joy
Caseworker To Julian Sturdy MP
1 Ash Street, York YO26 4UR
T: +44 (0)1904 784 847
E: matthew.joy@parliament.uk



| [They Work For You](#) | www.juliansturdy.co.uk |

Serving the people of York Outer

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City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

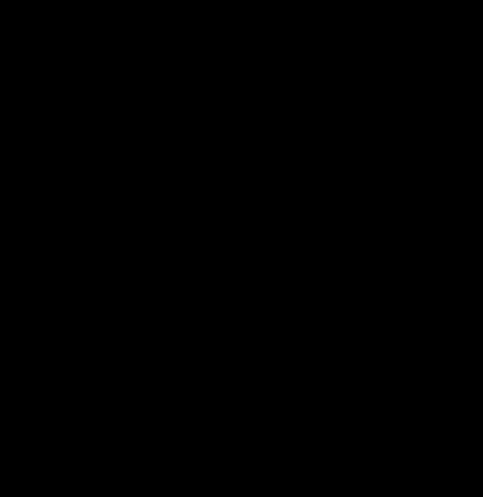
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Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Julian	
Last Name	Sturdy	
Organisation (where relevant)	Member of Parliament for York Outer	
Representing (if applicable)		
Address – line 1		
Address – line 2		
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		
E-mail Address		
Telephone Number		

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
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- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

I consider the Local Plan document to be legally compliant and in line with the National Planning Policy Framework (NPPF). The City of York Council (CYC) has consulted publicly on the Plan and made significant progress in making the document more sustainable and deliverable following feed-back from residents.

I believe CYC is compliant with Section 110 of the Localism Act (2011) In terms of the process and outcomes of co-operation. CYC has engaged constructively, actively and on an ongoing basis during public consultations and with other bodies as required.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

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Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared Justified
 Effective Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

In previous Local Plan consultation submissions I have raised concern about the scale of development and the impact on village communities around York. I am pleased that CYC reassessed housing numbers to bring them under control and in appreciation of our local infrastructure and transport network. The current housing allocation of 867 per annum is a far more sustainable number. Major sites have been reduced in number alongside the withdrawing of sites which should never have been included in the Plan originally. This has created a far more balanced offering.

One of my major criticisms of previous Local Plan documents was the scale of development on greenbelt land, with over 14,000 homes proposed for greenbelt area under the Preferred Options Draft 2013. The Council's work bringing this number down has been very welcome as it shows they are listening to the concerns which have been raised over several consultation periods. I do appreciate there are not enough brownfield sites to satisfy York's future housing need, but this should not mean running roughshod over village communities and unnecessarily concreting over swathes of greenbelt land.

The York Outer Ring Road is already over capacity and I have made my views very clear 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 naturally place greater strain on the A1237, so I remain concerned about the level of development north of the city and support efforts to upgrade this road.

I believe York's Local Plan is overall a sound document which has moved in the correct direction over the recent consultations. I do have a number of concerns about certain areas, particularly to the north of York, but feel that the Plan has addressed major issues such as safeguarded land and unsustainable sites proposed in early documents.

Please find attached a document which outlines my views on individual sites within the document.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law. The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

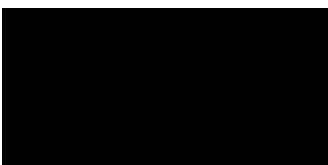
Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature  Date

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

Additional information submitted to the City of York Council's
Regulation 19 Consultation – Publication Draft February 2018 – Julian
Sturdy MP

Housing sites

North of Church Lane, Elvington: H39

There are concerns that the extra traffic generated from the proposed 39 properties at H39 would adversely impact the residents on Becksides. The contribution from Elvington Parish Council and residents indicate preference for the previously consulted expansion on Dauby Lane.

Land West of Elvington Lane: ST15

I welcomed the inclusion of brownfield land at Elvington Airfield in conjunction with the site that was then called Whinthorpe during the previous consultation in 2016. I have heard representations from residents regarding the impact this development would have on the existing transport and local infrastructure. I have particular concern about such a large development on school places and the increased pressure on our already congested roads; particularly the A64, A19 and A1079.

When this site was moved further away from the A64 I raised questions about the financial viability of delivering access onto the A64 and this question remains.

Station Yard: ST33

I have the same concerns as raised in the 'Whinthorpe' development about oversubscription in school places. I have heard representations from residents who generally support the development but not at the current level of housing. Congestion on the A19 at rush hour is already a significant issue for villagers and 147 extra properties will only exacerbate this problem.

Land South of Elvington Airfield Business Park: ST26

Community representatives generally support the proposed extension, but believe an archaeological assessment should take place before development. The existing traffic and congestion through the village, particularly on Main Street, indicates this expansion should also include consideration of a weight limit in the village.

Due to the potential impact of HGVs and possible disturbance to residents, I welcome the proposal of using B1 and B8 units, which will provide light industry, reflecting the rural nature of nearby villages.

Queen Elizabeth Barracks, Strensall: ST35

Strensall and the surrounding area has grown over the past few decades and this population growth has not been supported by significant improvements to road infrastructure and local facilities. This is extremely important to consider in context of the proposed 500 dwellings on this site.

I am pleased the proposed housing number on this site has been reduced from 578 to 500. This is a welcome reduction in light of the concerns which have been raised with me about the impact of the development on existing residents and the road network.

I welcome the proposal of a new primary school to support residents of the development. One of my major concerns of other large-scale developments is the impact on local schools, so supplying a high quality primary school at the development would reduce car movements in Strensall during peak hours and as well as additional pressures on Robert Wilkinson Primary.

Residents have raised concern about the increased traffic on Strensall Road at the Towthorpe junction. This must be considered when deciding on access to the development, particularly whether access to the site from Towthorpe Moor Lane may reduce extra pressure on the junction and thus move traffic away from the village.

This development must be able to foster a genuine and distinct community whilst also reflecting the deep military history at the site. Local amenities and open space should be supported so the development reflects the community in surrounding villages. This is a key point which must be considered so as to not be looked back on as a missed opportunity.

Local amenity must be protected, particularly the mature trees from the Strensall Road and Towthorpe junction into the village. This point has been raised by many residents and I fully support them in this respect. I note the consultation document indicates trees will be protected unless their 'loss is outweighed by the benefits and mitigation provided by the development' but I would take as strong a line in favour of retaining as many trees as possible.

I am pleased a Flood Risk Assessment and full drainage strategy has been pledged. I have heard concerns about capacity at the current drainage system at Walbutts Farm, so I would expect extensive investigatory work to take place into the potential impact of the additional 500 properties at the Barracks site, and appropriate action taken.

Towthorpe Lines: E18

Given the character of the surrounding area, I am pleased the proposals indicate light industry. While this is welcome, consideration should be made for the additional HGV lorries coming to and from the site and how this may affect Strensall village.

At my previous drop-in session it was proposed that an entry access road to this site could also provide, avoiding the SSSI land, an effective access route to the proposed Barracks site.

Haxby and Wigginton – Land North of Haxby: ST9

I have been clear in previous consultations that Haxby and Wigginton have contributed a great deal to our housing need in recent decades. This has placed strain on parking and local infrastructure but also flooding and surface water drainage.

I have commented on my disappointment that ST9 has not been reduced further than the 735 properties which are proposed.

Representations have been made to me regarding the lack of acknowledgement for potential air quality concerns as a result of the ST9 proposal. This would be a significant development for an area which feeds in to the Outer Ring Road and I would expect air quality to be considered in terms of numbers and the impact on Haxby and Wigginton residents.

I previously raised concern about the viability of the Whiteland Field site in Haxby, particularly with regard to the large electricity pylons and power lines within the proposed site. I was therefore pleased to note this site has been removed from proposals.

Land West of Wigginton Road: ST14

I welcomed during the previous consultation the reduction of properties proposed at this site. I have raised the impact of this proposal on the A1237 in my comments above and can only reiterate that whilst the significant fall in housing numbers from previous consultations is welcomed, this site will still significantly impact our already pressured transport network.

Land at Knapton Village: H53

This site has previously been rejected for housing, most recently in 2016 due to inappropriate encroachment onto the green belt, as well as on the openness and character of Knapton village.

I am not convinced this proposal has addressed the issues raised and therefore do not believe this development should be included in the Local Plan.

Traveller and Travelling Showpeople allocations

I very much welcome the direction of travel in the Council's approach to allocating traveller sites in the Local Plan. I made very clear in my 2013 submission that the policies were not evidence based and did not reflect the true level of demand in York. I am grateful that the Council have listened and previously proposed sites in Dunnington, Huntington, Knapton, Rufforth and Naburn have been removed.

The proposed Elvington Showpeople additions have caused great concern amongst residents. A planning application for one permanent pitch on this site was refused by the Council on two occasions in 2010, on the grounds that the proposed development constitutes inappropriate development in the greenbelt. On appeal, the Planning Inspector

agreed with the Council's decision making but allowed temporary permissions for one pitch until March 2016. This was then extended and the site is now included as a permanent site for additional plots.

I have been clear that I believe the need for Showpeople pitches does not constitute the exceptional circumstances required to permit development in the greenbelt. There are insufficient amenities in the village to cope with additional Showpeople families.

From: Andrew Sharp [Andrew.Sharp@makeityork.com]
Sent: 04 April 2018 16:55
To: localplan@york.gov.uk
Subject: Make It York response to the Local Plan Publication Draft Consultation
Attachments: MIY Local Plan Publication draft Consultation Response - April 2018.docx.pdf

To whom it may concern

Please find attached Make It York's response to the Local Plan Publication Draft Consultation.

Best Regards

Andrew Sharp

Andrew Sharp / Head Of Business
Direct Line / 01904 555766

Make It York



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FOR BUSINESS

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V
4
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GUIDE 2018**



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City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

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1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Andrew	
Last Name	Sharp	
Organisation (where relevant)	Make It York	
Representing (if applicable)		
Address – line 1		
Address – line 2		
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		
E-mail Address		
Telephone Number		

Guidance note

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Part B - Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does 'Sound' mean?

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Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared Justified
Effective Consistent with national policy

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(Complete any that apply)

Paragraph
no.

Policy
Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

As the official economic development and inward investment agency for York, Make It York very much welcomes another opportunity to comment on the draft Local Plan.

It is important that the city has a robust plan to guide commercial and residential development in support of economic growth over the coming years. Our response reiterates and builds on our previous submissions and the positive ongoing dialogue we have with CYC officers.

Moving towards an approved Local Plan is vitally important to the city's long term future development and we are wholly supportive of the City Council's efforts to move it forward. Overall we believe the plan to be sound and our submission is intended to be a helpful contribution to ensuring that the plan supports the city's economic strategy and delivers the land allocations required to support the future economic growth we hope to see in both the short, medium and longer term.

The overall increase in employment land allocation throughout the plan's development has been welcomed, especially where it relates to B1a office use. We are happy that this recognises both the positive growth in the York economy and the significant losses in office stock seen over the last three years.

As part of our earlier consultation responses Make It York has highlighted the need to ensure sufficient range and flexibility to deliver land requirements throughout the whole plan period. It is important that the employment land allocation is applied flexibly to ensure sufficient quantum can be brought forward in a timely manner. We are therefore pleased to see that the draft plan applies greater use flexibility across a broader range of sites than was the case in earlier versions. The flexible approach on use classes applied to sites including those at the University of York, Northminster, and Elvington will help to deliver the right mix of uses and provide the flexibility needed to respond to market demand. However, we are concerned that recommendations for an additional allocation of land at ST26 Elvington Airfield Business Park and ST27 University of York, have been rejected.

Both areas offer an opportunity to meet the needs of expanding firms, helping to create additional jobs in the medium and longer term. Make It York works with companies looking to expand in the city and the level of current known demand expressed to us for industrial space on or close to the ST26 site in particular is of concern. This currently stands at approximately 61,500sqft, c26% of the proposed allocation and whilst we would accept not all of this may be taken up, should we continue to see the level of current demand for industrial space continue we feel the proposed allocation could be used long before the end of the local plan period.

We also believe that further potential remains to add flexibility within areas of the city located close to the A64, offering real opportunity for further commercial development at sites which are well connected to our major trunk roads, and can provide opportunity to deliver further short to medium term solutions across all use classes.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

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Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

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If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145).

Signature



Date

4/4/2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

From: Zoe Harrison [ZoeHarrison@listerhaigh.co.uk]
Sent: 04 April 2018 16:59
To: localplan@york.gov.uk
Subject: Local Plan Representation
Attachments: Comments_form_FINAL - Beckett.docx; STRATEGIC HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT SITE SUBMISSION FORM.pdf; Site Plan.pdf

Dear Sirs,

Please find attached a representation submitted on behalf of Mr & Mrs Beckett to the Local Plan consultation.

I would appreciate if you could confirm receipt in due course.

Kind regards,

Zoe Harrison BSc (Hons) MRICS
RICS Registered Valuer
Chartered Surveyor



Lister Haigh (Knaresborough) Limited
106 High Street, Knaresborough, North Yorkshire, HG5 0HN
Tel: 01423 860322
Fax: 01423 860513
www.listerhaigh.co.uk



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Company Name: Lister Haigh (Knaresborough) Limited, Registered at Companies House, Registration Number 6750526.

Registered Address: 104-106 High Street, Knaresborough, North Yorkshire, HG5 0HN

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr & Mrs	Miss
First Name	A	Zoe
Last Name	Beckett	Harrison
Organisation (where relevant)		Lister Haigh (Knaresborough) Ltd
Representing (if applicable)		Mr & Mrs A Beckett
Address – line 1		106 High Street
Address – line 2		Knaresborough
Address – line 3		North Yorkshire
Address – line 4		
Postcode		HG5 0HN
E-mail Address		zoe.harrison@listerhaigh.co.uk
Telephone Number		01423 860322

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

- Online via our website www.york.gov.uk/localplan.
- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Draft Policy GB1: Green Belt

This policy does not allow flexibility for sites located adjacent to settlements to come forward for market housing schemes. The review of the Green Belt has not taken into full consideration the extent of amendments that would need to be made to allow for appropriate development sites to come forward.

Draft Policy H1: Housing Allocations

We submitted a site for consideration as a draft allocation for housing in November 2017. It has not been given due consideration, nor has it been appraised by the Council, not even for the SHLAA process.

The site is in a sustainable location on the edge of the village of Rufforth. It has a community hall, a primary school, a public house, a Methodist church and local businesses offering a source of employment.

It is bounded to the north by Wetherby Road, a playing field to the south and residential development at Southfield Close to the west.

As highlighted in a previous representation, the whole of the site is currently in agricultural use and therefore considered to have a low potential of providing the necessary characteristics for a suitable habitat for any protected species.

Continued....

It is a small Greenfield site and any development proposal will be carefully designed in order to minimise any harm to the character and appearance of the village, as the size of the site will allow development to be of the highest architectural and environmental standard incorporating an area of open space. Measures would be taken to mitigate the further effect development would have on the countryside and landscape setting of the village.

There are mature hedgerows which form the boundary of the site. This would mitigate the visual impact on the open countryside and it would not appear to be very prominent on approach in its setting. The existing trees and hedgerows will provide excellent screening and could be further enhanced.

The site is within the SSSI Impact Zone of Askham Bog SSSI and Clifton Ings and Rawcliffe Meadows SSSI. Provision could be made for open spaces to increase wildlife interest, biodiversity and woodland cover. The eastern boundary of the site can be screened effectively using natural materials so as to mitigate any further effects development may have on the SSSI.

The site is located solely within flood zone 1 and as such it is considered to be at a low risk of flooding. Our Client does, however, recognise the need to ensure that development of the site would not increase the risk of flooding within the local area, in line with national planning policy.

Our client maintains that this site is a logical site for development and it is our opinion that the Council should modify the plan and include this site as a housing allocation.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Draft Policy GB1: Green Belt

The extent of the Green Belt should be altered to allow other sites to come forward where they are sustainable, such as the site our client has put forward at Rufforth.

Draft Policy H1: Housing Allocations

We disagree with the draft allocations. We believe that site ref. land off Wetherby Road, Rufforth should be supported and included as a housing allocation in the Local Plan and should be modified to meet the test of soundness.

Attached is a representation that was submitted to the Council in November 2017 containing further information and a site plan.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We wish to participate at the oral part of the examination in order to represent our client and their site being put forward for consideration as an allocation in the Local Plan. We feel that representations made at previous consultations have not been given due consideration.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

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Signature  Date

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

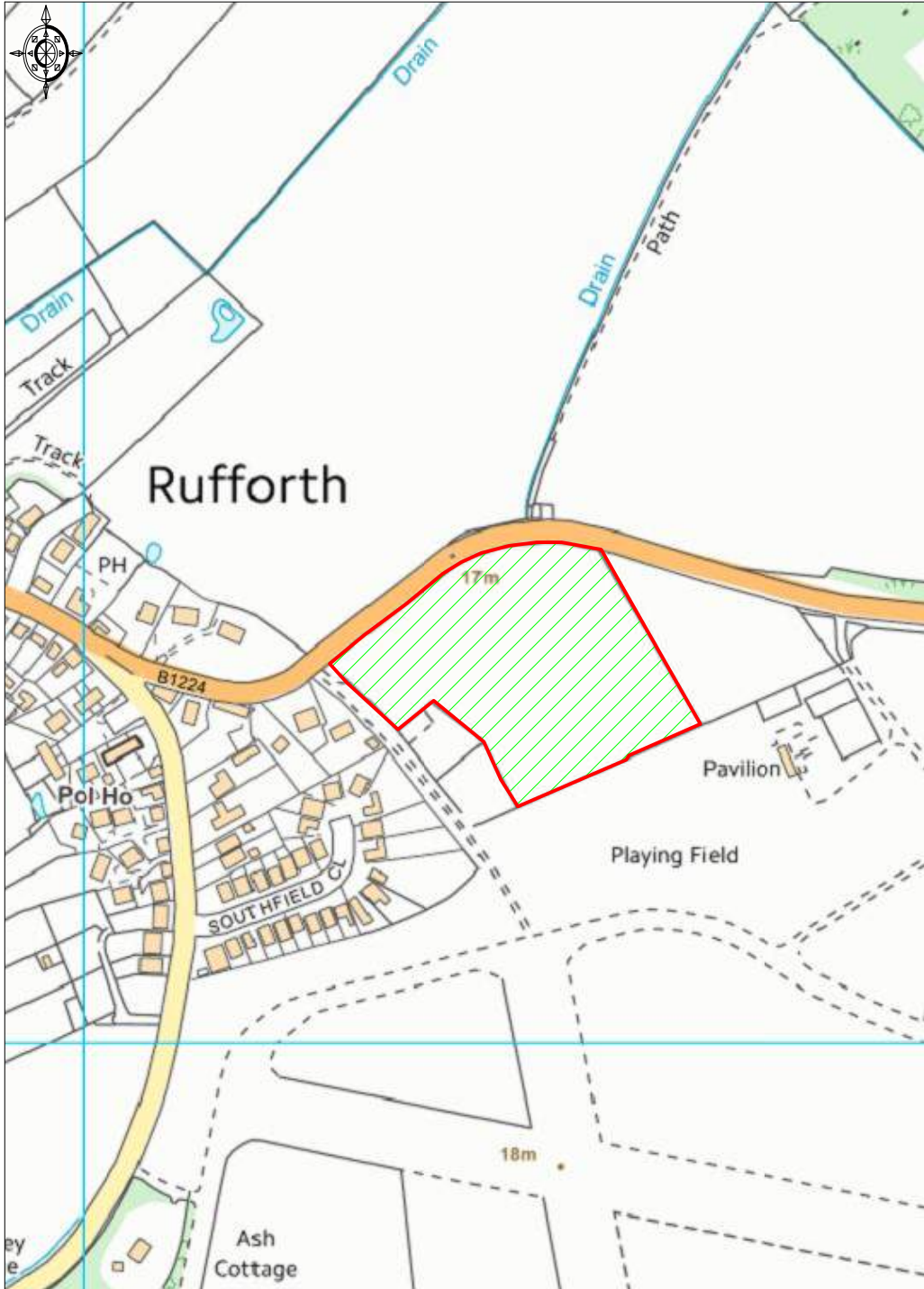
STRATEGIC HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT SITE
SUBMISSION FORM

CONTACT DETAILS:		
	1. Owner Details	2. Agent's Details
Title	Mr & Mrs	Miss
First Name	A	Zoe
Last Name	Beckett	Harrison
Job Title		Chartered Surveyor
Organisation		Lister Haigh (Knaresborough) Limited
Address – line 1		106 High Street
Address – line 2		Knaresborough
Address – line 3		North Yorkshire
Postcode		HG5 0HN
E-mail Address		Zoeharrison@listerhaigh.co.uk
Telephone Number		01423 860322

SITE INFORMATION	
Site Name	Land off Wetherby Road
Site Address	Rufforth, York, YO23 3QD
Site Area	2.98 hectares (7.36 acres)
Site Availability	Site is available immediately

SITE CONSTRAINTS		
Does the site have access to a public highway?	<input checked="" type="radio"/> Yes	<input type="radio"/> No
Are there any constraints in connection with ownership such as leases, covenants or ransom strips which may affect the proposed use of the site?	Yes - if yes please provide details	<input checked="" type="radio"/> No
Adjacent land uses.	The land is bordered to the west by residential property, to the south by Rufforth Airfield and agricultural land to the north and east.	
Details of any ecological constraints and how these may be overcome	The site is within the SSSI Impact Zone of Askham Bog SSSI and Clifton Ings and Rawcliffe Meadows SSSI. Provision could be made for open spaces to increase wildlife interest, biodiversity and woodland cover. The eastern boundary of the site can be screened effectively using natural materials so as to mitigate any further effects development may have on the SSSI.	

Details of any designated or non-designated heritage assets	N/A
Details of any landscape constraints	Green Belt
Other constraints	N/A
Any constraints relating to mains water, sewerage, gas or electricity?	None Known
Details of any other relevant information	<p><u>Location</u> The land off Wetherby Road is sustainably located adjacent to Rufforth, just 5 miles west of York City Centre. It is in close proximity to the A59.</p> <p><u>Settlement Growth</u> The land off Wetherby Road is ideally suited to provide required new homes for local people as there is an urgent need for the delivery of site allocations.</p> <p>Inclusion of the land off Wetherby Road would provide a sustainable site for settlement growth due its ideal location close to local shops and services within Rufforth and York.</p> <p><u>Landscape</u> Whilst clearly a green field site, the landscape is not, in our opinion, of high quality when considered in the context of other landscapes within the district.</p> <p><u>Ecology</u> Neutral or slight effects on designated sites and/or priority habitats and species.</p> <p><u>Bus/Rail</u> Rufforth has well-used bus routes within walking distance and would provide a viable way to get to work in the nearby centre of York.</p> <p>Traffic generation can be kept to a minimum by encouraging the population to use the public transport network.</p> <p><u>Schools</u> There are a number of nurseries, primary and secondary schools within the city that are in close proximity to the site.</p> <p><u>Health</u> The closest GP surgery is located in York.</p>



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Promap
LANDMARK INFORMATION GROUP

*This map was created by
Lister Haigh (Knaresborough) Ltd*

Lister Haigh

From: Helen Ball [H.Ball@gladman.co.uk]
Sent: 04 April 2018 17:03
To: localplan@york.gov.uk
Cc: Nicole Penfold; Phill Bamford; Hannah Rodger
Subject: York Local Plan Representations- Publication Draft 2018
Attachments: York Publication Draft - Gladman FINAL.PDF



Dear Sir/Madam

York Local Plan - Publication Draft 2018

Please find attached the representations made on behalf of Gladman Developments for the above consultation.

Please could I request a response confirming receipt of these representations?

Kind regards

Helen

Helen Ball - Planning Manager | h.ball@gladman.co.uk | DDI: 01260 288 847 | M: 07507 662 230

Gladman Developments Limited | Company Registration No. 03341567 | Gladman House | Alexandria Way | Congleton | Cheshire | CW12 1LB

T: 01260 288 800 | F: 01260 288 801

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City of York

Local Plan – Publication Draft February 2018



April 2018

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APPENDICES

Appendix 1	Land at Tadcaster Road, Copmanthorpe – Development Framework Plan
Appendix 2	Land at Tadcaster Road, Copmanthorpe – Indicative Landscape Plan

EXECUTIVE SUMMARY

- i. This submission provides Gladman Development's written representations on the City of York Local Plan Publication Draft (CYLP).
- ii. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure and has previously been involved in the preparation of the CYLP as well as with site delivery in York.
- iii. These representations concern the following matters:
 - Duty to Cooperate;
 - Sustainability Appraisal;
 - Development Principles;
 - Spatial Strategy;
 - Housing;
 - Site SS16 – Land at Tadcaster Road, Copmanthorpe; and
 - General Development Management Policies.
- iv. Gladman support the identification of Land at Tadcaster Road, Copmanthorpe (Site SS16) in the CYLP. It is considered that this site does not perform any Green Belt function and has strong and clear defensible boundaries in the East Coast Mainline, A64 and existing built up settlement of Copmanthorpe. As a result of these urbanising influences, the site is not a sensitive or tranquil landscape.
- v. The site is supported by the local community and is included in the emerging Neighbourhood Plan for Copmanthorpe. It is available, achievable and deliverable and is capable of delivering up to 160 units, including a significant proportion of affordable dwellings. The site will contribute to the Council's 5-year housing land supply in the early part of the plan period. A planning application for this site has been submitted (but at the time of writing, this had not been validated) to demonstrate this and allow early delivery.

1 INTRODUCTION

1.1 Context

1.1.1 Gladman Developments (Gladman) specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Development's representations on the CYLP. Gladman request to participate in the CYLP Examination in due course.

1.1.2 Gladman have land interests at Tadcaster Road, Copmanthorpe and provide detailed representations regarding this site within this submission.

1.2 Previous Submissions

1.2.1 Gladman have submitted the following representations regarding the CYLP:

- City of York Local Plan Preferred Options (July 2013);
- City of York Local Plan – Further Sites Consultation (July 2014);
- City of York Local Plan – Preferred Sites Consultation (July 2016); and
- City of York Local Plan Pre-Publication Draft (September 2017).

1.3 National Planning Policy

1.3.1 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit, that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – the Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the Plan should be the most appropriate strategy when considered against the reasonable alternatives based on proportionate evidence base;
- **Effective** – the Plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities;

- **Consistent with National Policy** – the Plan should enable the delivery of sustainable development in accordance with policies in the Framework.

1.4 Housing White Paper, Autumn Budget, Draft NPPF

1.4.1 The Government published the Housing White Paper in February 2017 for consultation. Whilst it is a White Paper, it nevertheless represents a very clear direction of travel and clear indication of the Government's intent.

1.4.2 The title of the White Paper makes apparent that the Government considers the housing market to be broken, it is also clear from the document foreword by the Prime Minister that the cost of housing is a key part of why the housing market is considered broken. In the foreword, the Prime Minister states:

"Today the average house costs almost eight times average earnings – an all time record."

"In total more than 2.2 million working households with below average incomes spend a third or more of their disposable income on housing."

"We need to build many more houses, of the types people want to live in, in the places they want to live. To do so requires a comprehensive approach that tackles failure at every point in the system."

1.4.3 The second foreword from the Secretary of State adds further to the Government's thinking, particularly on the need to build new homes now, it states:

"This country doesn't have enough homes. That's not a personal opinion or a political calculation. It's a statement of fact."

"Soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation."

"That has to change. We need radical, lasting reform that will get more homes built right now and for many years to come."

1.4.4 The White Paper outlines further potential reforms to the plan making process, OAN methodology, Green Belt consideration and housing delivery test, amongst others.

1.4.5 The reason for this housing crisis is that the country is simply not building enough homes and has not done so for far too long.

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- 1.4.6 Everyone involved in politics and the housing industry therefore has a moral duty to tackle this issue head on. The White Paper states quite unequivocally that “the housing shortage isn’t a looming crisis, a distant threat that will become a problem if we fail to act. We are already living in it.”
- 1.4.7 Tackling the housing shortage is not easy. It will inevitably require some tough decisions. But the alternative, according to the White Paper, is a divided nation, with an unbridgeable and ever widening gap between the property haves and have-nots.
- 1.4.8 The challenge of increasing supply cannot be met by Government alone. It is vital to have local leadership and commitment from a wide range of stakeholders, including local authorities, private developers, housing associations, lenders and local communities.
- 1.4.9 The starting point is building more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home. It will also bring the cost of renting down. We need more land for homes where people want to live. All areas therefore need to plan to deal with the housing pressures they face.
- 1.4.10 Currently, over 40% of local planning authorities do not have a plan that meets the projected growth in households in their area. All local authorities should therefore develop an up-to-date plan with their communities that meets their housing requirement based upon an honest assessment of the need for new homes.
- 1.4.11 Local planning authorities have a responsibility to do all that they can to meet their housing requirements, even though not every area may be able to do so in full. The identified housing requirement should be accommodated in the Local Plan, unless there are policies elsewhere in the Framework that provide strong reasons for restricting development, or the adverse impacts of meeting the requirement would significantly and demonstrably outweigh the benefits. Where an authority has demonstrated that it is unable to meet all of its housing requirement, it must be able to work constructively with neighbouring authorities to ensure that the remainder is met.
- 1.4.12 Plans should be reviewed regularly, and are likely to require updating in whole or in part at least every five years. An authority will also need to update their plan if their existing housing target can no longer be justified against their objectively assessed housing requirement.
- 1.4.13 Policies in Local Plans should also allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are

sustainable, and there are opportunities for a diverse construction sector including opportunities for SME housebuilders to deliver much needed housing.

- 1.4.14 In terms of rural areas, the Government expects local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up. It is clear that improving the affordability of homes in rural areas is vital for sustaining rural communities, alongside action to support jobs and services. There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people.
- 1.4.15 Finally, given the Government has made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing housing requirements of groups with particular needs such as older and disabled people.
- 1.4.16 The White Paper is the cornerstone of future Government policy on fixing the housing market. It provides a clear statement of intent that this Government is serious about the provision of the right number of homes in the right places.
- 1.4.17 Following the election, Sajid Javid re-iterated the Government's intentions for boosting housing growth stating that he wants areas that have benefited from soaring property prices to play their part in solving the housing crisis. Mr Javid pointed out that where property prices were particularly unaffordable, local leaders would need to take a long, hard and honest look to see if they are planning for the right number of homes.
- 1.4.18 The Autumn Budget 2017 brought further details of the Government's commitment to building a Britain that is 'fit for the future.' A prominent feature of this is tackling the housing crisis, with housebuilding featuring prominently amongst the Chancellor's announcements, which included further confirmation that:
- "The Government is determined to fix the broken housing market, and restore the dream of home ownership for a new generation."
- 1.4.19 The affordability of housing for young people is a key challenge for the Government, and whilst it is recognised that there is no 'single magic bullet' to solve the housing crisis, the Government is actively seeking to tackle obstacles standing in the way of first time buyers. The Government sees a 'big step up' in new house building as an important element in its

strategy to address the acute affordability problem and has set a goal to build 300,000 homes a year by the mid-2020's.

- 1.4.20 The vital importance of housing to the economic success of our cities and regions is also highlighted in the Government White Paper "Industrial Strategy: Building a Britain Fit for the Future", which was published in November 2017. This includes reference to the introduction of planning reforms that will ensure more land is available for housing, and that better use is made of underused land in our cities and towns. It also sets out the challenge to raise housing supply to 300,000 per year before the end of the current parliament. The Government wants to support greater collaboration between councils, a more strategic approach to the planning of housing and infrastructure, more innovative and high quality design in new homes and the creation of the right conditions for new private investment.
- 1.4.21 Further to the Housing White Paper, the Government published the Draft Revised National Planning Policy Framework in March 2018 for consultation. Whilst it is at present, only a draft for consultation, the document clearly demonstrates the Government's direction of travel and provides a firm indication of the planning reforms ahead. As such, Gladman believe it is necessary for the Council to consider the emerging plan against the proposed revisions made in the draft revised Framework to avoid the Plan becoming out of date early on in the Plan period and to encompass as many of the changes as possible so that the Government's new agenda can be swiftly implemented.
- 1.4.22 In his speech launching the draft revised Framework, Housing Secretary Sajid Javid set out the importance of reviewing the current system;
- "An entire generation is being locked out of a broken housing market as prices and rents race ahead of supply. Reforming the planning system is the crucial next step to building the homes the country needs... This Government is determined to fix the broken housing market and restore the dream of home ownership for a new generation. There is no silver bullet to this problem but we're re-writing the rules on planning so we can take action on all fronts".
- 1.4.23 The proposed revisions to the Framework are almost entirely focussed on housing, improving delivery to achieve the increased target of 300,000 homes per year set out by the Government along with significantly increasing affordable housing provision.

2 LEGAL COMPLIANCE

2.1 Duty to Cooperate

2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination, the 2013 Mid Sussex Examination, and St. Albans if a council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.

2.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration¹ as set out in the PPG, it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard York must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their joint working arrangements, to satisfactorily address cross boundary strategic issues and the requirement to meet any unmet housing need.

2.1.3 Further, the PPG reflects on the public bodies which are subject to the Duty to Cooperate. It contains a list of prescribed bodies. The PPG then goes on to state that:

“These bodies play a key role in delivering local aspirations, and cooperation between them and local planning authorities is vital to make Local Plans as effective as possible on strategic cross boundary matters.”

2.2 Sustainability Appraisal

2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environment Assessment of Plans and Programmes regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan’s preparation, assessing the effects of the Local Plan’s proposals on sustainable development when judged against reasonable alternatives.

¹ PPG Reference ID 9-011-2014036

- 2.2.2 The CYLP should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative the CYLP's decision making and scoring should be robust, justified and transparent.

3 DEVELOPMENT PRINCIPLES

3.1 Policy DP1 – York Sub Area

- 3.1.1 Gladman reiterate support for Policy DP1, especially the recognition set out in clause (i) that York will fulfil its role as a key economic driver within both the Leeds City region and the York, North Yorkshire and East Riding LEP area. Gladman also strongly support clause (iii) which states that the Local Plan will seek to meet the housing needs of current and future population including that arising from economic and institutional growth.

3.2 Policy DP2 – Sustainable Development

- 3.2.1 Gladman support Policy DP2 of the CYLP and in particular the recognition that the Plan will address the housing and community needs of York's current and future population.

3.3 Policy DP4 – Approach to Development Management

- 3.3.1 Gladman support Policy DP4 as this accurately reflects the Government's approach to sustainable development as set out in the Framework.

4 SPATIAL STRATEGY

4.1 Policy SS1 – Delivering Sustainable Growth for York

4.1.1 Policy SS1 outlines that the Plan will deliver a minimum annual provision of 867 new dwellings over the plan period to 2032/33. This scale of housing provision is derived from the latest housing needs technical work carried out for the Council by GL Hearn (the SHMA Update 2017).

4.1.2 The latest evidence, prepared on behalf of the Council by GL Hearn, sets out that the demographic starting point for the calculation of housing need is 867 dpa over the plan period. The report also recommends a 10% uplift to the demographic start point in order to address Market Signals. This increases the housing need figure to 953 dpa. It is considered that this would provide sufficient growth in the working age population to meet the economic growth potential of York over the Plan period so no further uplifts would be required. GL Hearn's recommendation to the Council was therefore that the housing need for York over the plan period is 953 dpa.

4.1.3 However, the Council, when considering the evidence, resolved to set a housing requirement in the CYLP of 867 dpa which represents simply the demographic need for housing in York.

4.1.4 Gladman has concerns that the housing requirement that is included in the York Local Plan as it does not fully reflect the latest evidence as set out in the Strategic Housing Market Assessment Update (2017) and does not fully reflect the guidance set out in the Framework and Planning Practice Guidance on defining housing needs.

4.1.5 Gladman are concerned that in an area such as York, where housing affordability is a priority issue, the lower quartile ratio of house price to earnings is increasing (8.92 in 2015) and there is a key Government agenda attached to addressing the affordability of housing, the Council has chosen not to address clear worsening Market Signals evidence in setting their housing requirement in the CYLP.

4.1.6 Gladman consider that as a minimum, the Council's housing requirement in the CYLP should be 953 dpa as set out in the Council's own evidence.

4.2 Policy SS2 – The Role of York's Green Belt

4.2.1 The emerging Local Plan will set York's detailed Green Belt boundaries for the first time, but in doing so, it must be recognised that this should be done with the view that the full needs

- for housing and employment growth need to be delivered both within this plan period and for some length of time beyond.
- 4.2.2 The Framework is clear in paragraph 83, that when drawing up Green Belt boundaries LPAs should have regard to their permanence and their ability to endure beyond the plan period. It is essential therefore, that the CYLP sets detailed Green Belt boundaries that allows them to meet their full housing need, without the requirement to export the need outside of the City boundary, both for this plan period and for the next.
- 4.2.3 Policy SS2 outlines that to ensure permanence beyond the plan period sufficient land is allocated for development to meet the needs identified in the Plan and for a further 5 years to 2038. Gladman recommend that further land should be identified to be removed from the Green Belt as the current flexibility could be considered to be insufficient.
- 4.2.4 In terms of detail, Gladman reiterate the suggestion that it may be preferable to release some pressure on the York Green Belt by allowing small adjustments to Green Belt boundaries around local service centres in locations such as Copmanthorpe, where it can be demonstrated that the land is not currently fulfilling the five purposes of Green Belt.
- 4.2.5 The site at Tadcaster Road, Copmanthorpe (Site SS16) fulfils this role and therefore it is considered to be a suitable release from the Green Belt. This site fulfils a local need, is supported by the local community through their Neighbourhood Plan and is available, achievable and deliverable.
- 4.2.6 The site at Copmanthorpe is not considered to be sensitive in landscape terms or important for the setting of York. Development on this site would reflect the existing settlement pattern and would maintain the identity of Copmanthorpe. It would be contained by the surrounding transport infrastructure and woodland which provide physical containment, separation and defensible boundaries. The separate character and identity of Bishopthorpe to the east and of the City of York to the north would also remain unaffected.
- 4.2.7 The site is well contained between the urban form and the surrounding transport infrastructure and when assessed against the five purposes of the Green Belt, as set out within the NPPF, does not provide a useful Green Belt function as set out below:
- a) To check the unrestricted sprawl of large built up areas – the site is contained on all sites by residential properties, the East Coast Mainline, and Tadcaster Road (A64(T)) dual carriageway. It is not required to prevent the sprawl of Copmanthorpe;

- b) To prevent neighbouring towns from merging into one another – the East Coast Mainline contains the south eastern edge of Copmanthorpe and the site. Provided that this is not breached there is no risk of coalescence with Bishopthorpe. The countryside between should be maintained as an ‘area preventing coalescence’;
- c) To assist in safeguarding the countryside from encroachment – the site, although in agricultural use, is contained by settlement and transport infrastructure. As a result it is not considered to be a tranquil or open area of countryside;
- d) To preserve the setting and special character of historic towns – the site context is dominated by modern housing development and transport infrastructure and does not form part of the setting of the historic core of Copmanthorpe nor does it contribute to the historic features of York. Development of the site would retain the current settlement pattern that is contained between the East Coast Mainline and the A64(T);
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land – this is a greenfield site. However, development of this site could relieve development pressure from more sensitive rural fringe and Green Belt sites and would provide opportunities for local affordable housing.

4.2.8 The release of this site from the Green Belt would provide logical and clear defensible Green Belt boundaries to further growth. The wider, relatively open and more sensitive surrounding countryside, which clearly performs Green Belt functions would also be protected and maintained.

4.3 Policy SS16 – Land at Tadcaster Road, Copmanthorpe

4.3.1 Gladman strongly support the identification of land at Tadcaster Road, Copmanthorpe for residential development. As set out above it is considered that the site does not perform any Green Belt function and has strong and clear defensible boundaries in the East Coast Mainline, A64(T) and existing built up settlement of Copmanthorpe. As a result of these urbanising influences, the site is not a sensitive or tranquil landscape.

4.3.2 The site is supported by the local community and is included in the emerging Neighbourhood Plan for Copmanthorpe. It is available, achievable and deliverable and is capable of delivering up to 160 units, including a significant proportion of affordable dwellings. The site will contribute to the Council’s 5-year housing land supply in the early part of the plan period.

- 4.3.3 Copmanthorpe is a sustainable location for growth and has been identified as an area requiring new housing in both the emerging Local Plan and emerging Neighbourhood Plan. The site is located within walking and cycling distance of the settlement's key services and facilities and has the potential to deliver additional community benefits such as improved play facilities available to all of the community, a site for new community facilities, improved public transport provision and links to the surrounding footpath network.
- 4.3.4 The site also has the ability to contribute towards improved educational provision within the settlement and will be of a high quality design which provides a mix of housing sizes, types and tenures to meet local need.
- 4.3.5 There are no statutory or non-statutory designations identified on the site apart from the current Green Belt.
- 4.3.6 An indicative Framework Plan has been prepared to demonstrate how the site might be brought forward (see Appendix 1). This has evolved since Gladman's previous submissions and reflects discussions with the Parish Council. The following concept / design objectives are proposed:
- a) A scheme of up to 160 dwellings within a robust Green Infrastructure Framework;
 - b) Contained between the Copmanthorpe settlement edge, the A64(T) and the East Coast Mainline, forming a logical infill reflecting the current settlement form;
 - c) Sustainably located at the edge of a 'local service centre' settlement in close proximity to a range of shops and services and with good direct transport connections;
 - d) Not located within an area of flood risk;
 - e) No planning policy or environmental constraints to development have been identified other than the Green Belt designation;
 - f) Removal of the site from the Green Belt would not conflict with the five purposes of the Green Belt. The settlement edge abruptly terminates at the edge of the site and the site does not currently provide a clear Green Belt function in this location. A revised Green Belt boundary alongside the East Coast Mainline would provide a more robust Green Belt boundary and importantly would not result in any change to the historic setting of York or close the identified gap between Copmanthorpe and Bishopsthorpe;

- g) An indicative layout that takes into consideration the noise constraints in the locality;
- h) Retention of the emerging Veteran Tree to the South of the site and protection of the TPO tree's on the western boundary of the site;
- i) Opportunity for a high quality residential scheme with built form that reflects the best examples of local character;
- j) In contrast to the surrounding landscape, the site is relatively visually contained and is only locally visible, adjacent to the more elevated Copmanthorpe residential edge from the A64(T) and Tadcaster Road as they pass the site. As screen planting on the adjacent A64(T) embankments becomes established this view will be further restricted. This contrasts with the surrounding approaches to York along the A64(T) and A1237 where there are wide open rural views across the landscape.
- k) Opportunity with development of the site to extend and enhance 'local green infrastructure corridors' as defined within the Green Corridors Technical Paper (2011) including enhancing links from Copmanthorpe to the A64(T) corridor and the SSSI to the north;
- l) A recreational route could be provided through the site to connect to Askham Bogs Nature Reserve from Yorkfield Lane (track), opening up rural access for residents of north east Copmanthorpe and extending the safe walk to school route from the village through to the development;
- m) Opportunity to secure much needed play and amenity open space. The Open Space Assessments specifically defines a shortfall of these facilities within north Copmanthorpe; and
- n) Contribution to offsite sport and recreation provision and other CIL compliant S106 financial requests.

4.3.7 Included as Appendix 2 to this submission is an indicative landscape plan for this site, this reflects requirements of the Parish Council for Cherry Trees along the frontage of the development.

4.3.8 Gladman therefore welcome the opportunity to work alongside the City Council and the Neighbourhood Plan group to ensure the delivery of the site in line with the aspirations of the local community.

- 4.3.9 Notwithstanding the above support for this site, Gladman object to the identification of the site to deliver 158 dwellings. Following detailed due diligence work, Gladman consider this site is capable of deliver up to 160 dwellings and recommend that Policy SS16 is amended to reflect this.
- 4.3.10 With regards to clause i) Gladman recommend that instead of delivering a mix in accordance with the Council's most up to date SHMA this should be amended to state *"a mix to be agreed with the Council prior to determination to reflect local needs and circumstances."*
- 4.3.11 Whilst Gladman note that the wording of clause ii) has been amended through this iteration of the CYLP Gladman recommend that further amendments should be made. Gladman recommend that this clause should be amended to state *"...which should be delivered prior to occupation of the first phase of development..."*

5 HOUSING

5.1 Policy H1 – Housing Allocations

5.1.1 Gladman reiterate concerns regarding the phasing of development suggested by Policy H1. Phasing should not be included unless it is fully justified by the need to deliver significant infrastructure before development is commenced. The Framework is clear that development which is in accordance with the development plan should go ahead without delay in order to significantly boost the supply of housing. Introducing phasing into Policy H1 is contrary to national policy and therefore Gladman recommend the removal of the phasing provisions from Policy H1.

5.1.2 Gladman also remain concerned with the level of windfall sites that the Council are including within the housing supply going forwards. The Framework states that local planning authorities may make an allowance for windfall sites if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply going forward. In order to include the windfall allowance of 169 dwellings per annum in the CYLP, the Council will need to have credible evidence to justify this.

5.2 Policy H2 – Density of Residential Development

5.2.1 Gladman accept that efficient use should be made of land, especially in areas which are constrained by the Green Belt for example. However, we would suggest that an element of flexibility should be added to Policy H2 as there may be circumstances where 35 dwellings per hectare in rural areas and villages is out of keeping with the setting and scale of development in the rural area and a slightly lower density may be preferred. An element of flexibility added to this policy would allow the design of sites to be more adaptable to the scale and character of the existing area.

5.3 Policy H3 – Balancing the Housing Market

5.3.1 Gladman support the flexibility provided by Policy H3. This states that housing mix proposed should have reference to the SHMA and be informed by up to date evidence of need, including at the local level and the nature and character of site and surrounding area. This allows sites to provide a mix which suits the local circumstances and for this element of an application to be considered on a site by site basis rather than a strict policy requirement.

5.4 Policy H4 – Promoting Self and Custom House Building

5.4.1 The concept of self-build and custom build housing is supported as this is in line with Government aims and objectives. Notwithstanding this, Gladman raise some concern with the 5% requirement on all strategic sites. It is considered that the percentage requirement should be determined on detailed evidence of local need. Gladman support the reference to the Council having regard to viability considerations in relation to this requirement.

5.4.2 Further, Gladman support the inclusion of the policy mechanism whereby if the self-build or custom build plots which are made available and marketed appropriately for 12 months do not get sold and brought forwards that these plots may revert back to the wider scheme and be built out as conventional plots for market housing by the developer. This provides flexibility for instances when these plots do not come forward for whatever reason and ensures that the full scale of provision on these sites is delivered.

5.5 Policy H5 – Gypsies and Travellers

5.5.1 Gladman raise concerns regarding Policy H5 which requires applications on strategic sites to provide gypsy and traveller accommodation. Where this is required on an allocated strategic site it can cause significant issues with deliverability of the site in question. Many sites where this issue has arisen have stalled and simply not been delivered because of the complexities of development finance availability where gypsy and traveller accommodation is provided on an allocated site. It is considered that the Council would not wish its housing provision to be hampered by such issues.

5.5.2 It is recognised that there is some flexibility built into Policy H5 to allow for off-site provision or a commuted sum towards the provision of gypsy and traveller accommodation. It is considered that this policy should extend its flexibility to set out that this provision will only be required where it is evidenced that there is a need for such plots in a specific location. This would avoid over provision of such accommodation and that the potential for inefficient use of land, should land be set aside which is not required.

5.6 Policy H9 – Older Persons Specialist Housing

5.6.1 Gladman support Policy H9 as the Council are seeking to enable the delivery of extra care accommodation specifically designed to meet the needs of older people. York is facing a significant issue with an ageing population and the provision of specialist accommodation is required to meet this specific need and help free up open market housing for new families requiring larger accommodation.

5.6.2 Specialist housing with care for older people is a type of housing which provides choice to adults with varying care needs and enables them to live as independently as possible in their own self-contained homes, where people are able to access high quality, flexible support and care services on site to suit their individual needs (including dementia care). Such schemes differ from traditional sheltered/retirement accommodation schemes and should provide internally accessible communal facilities including residents' lounge, library, dining room, guest suite, quiet lounge, IT suite, assisted bathroom, internal buggy store and changing facilities, reception and care managers office and staff facilities.

5.7 Policy H10 – Affordable Housing

5.7.1 Policy H10 provides the proposed approach to the delivery of affordable housing. The policy refers to Table 5.4 which sets out various site thresholds / site typologies and target affordable housing provisions. Gladman recommend that the Council revisit this policy and the proposed thresholds within Table 5.4 because as drafted this is not in line with the policy and guidance in the NPPF and PPG.

6 HEALTH AND WELLBEING

6.1 Policies HW2, HW3, HW4 and HW5

6.1.1 In terms of the provision of community benefits, such as those set out through policies HW2, HW3, HW4 and HW5, Gladman remind the Council that it is important for the evidence base for the Local Plan to properly assess the viability of all the policy requirements to ensure consistency with paragraphs 173 and 174 of the Framework.

6.1.2 As the Council will be aware, plans need to be deliverable and sites should not be subject to such a scale of obligation and policy burdens that their ability to be developed viably is threatened. Therefore, the Council should assess the likely cumulative impacts on development in their area of all existing and proposed local standards and policies through a comprehensive and robust Viability Assessment to ensure that the cumulative impacts of these standards and policies do not put the implementation of the Plan at serious risk.

7 PLACEMAKING, HERITAGE, DESIGN AND CULTURE

7.1 Policy D2 – Landscape and Setting

7.1.1 Gladman suggest that Policy D2 would benefit from some minor wording revisions to ensure that it is fully compliant with the Framework. Impact on the landscape is one factor that should be considered by the decision maker when determining any planning proposal and ultimately, it is a balance of the harm of development against the benefits. It is only where the harm significantly and demonstrably outweighs the benefits should planning permission be refused.

7.1.2 Clause (ix) of Policy D2 sets out that proposals should “avoid any adverse impact on intrinsically dark skies and landscapes, townscapes and or habitats that are sensitive to light pollution...” Whilst this is accepted, it should be recognised that any adverse impacts that a proposal has on these issues should be factored into the planning balance when making a decision.

7.2 Policies D4, D5, D6 – Conservation Areas, Listed Buildings and Archaeology

7.2.1 Gladman note that changes have been made to these heritage policies since the previous iteration of the CYLP. Gladman are supportive of these changes as the new policy text included within the policies better aligns with the Framework. Specifically, Policies D4 and D5 now refer to the test to be applied for proposals impacting on designated heritage assets. The Framework (paragraphs 132-134) states that if the harm to a heritage asset is deemed to be substantial then the proposal would need to achieve substantial public benefits to outweigh that harm. If the harm is less than substantial then the harm should be weighed against the public benefits of the proposal.

7.3 Policy D7 – The Significance of Non-Designated Heritage Assets

7.3.1 Gladman note that similar to the policies in relation to designated heritage assets, this policy in relation to non-designated heritage assets has been amended since the previous iteration of the CYLP. Again Gladman are supportive of these changes which highlight the test to be applied to proposals affecting non-designated heritage assets. The policy now outlines that *“developments which would remove, harm or undermine the significance of such assets, or their contribution to character of place, will only be permitted where the benefits of the*

development outweigh the harm having regard to the scale of harm and significance of the heritage asset.”

- 7.3.2 Gladman are supportive of this revised wording which now better aligns with paragraph 135 of the NPPF which highlights the need for a balanced judgment to be made.

8 GREEN INFRASTRUCTURE

8.1 Policy GI6 – New Open Space Provision

- 8.1.1 Gladman note that Policy GI6 suggests that significant new open space has been identified in connection with the strategic sites, including SS16/ST31, as shown on the proposals map. Gladman agree with the wording in this policy outlining that the precise delineation and extent of new open space should be set through detailed masterplanning. In this regard, with reference to OS11, Gladman refer to the Framework Plan included as Appendix 1 to this submission. This Gladman believe balances development and site constraints with Open Space provision.

9 CLIMATE CHANGE

9.1 Policy CC1 – Renewable and Low Carbon Energy

9.1.1 The Council set out in the supporting text to Policy CC1 (paragraph 11.8) that the policy in the CYLP for carbon reduction goes beyond the target emissions rate of Part L Building Regulations. The Council itself, sets out in paragraph 11.10 that following the Deregulation Act 2015, Council's can no longer demand energy efficiency improvements beyond the requirements of the Building Regulations.

9.1.2 Additionally, the Written Ministerial Statement of 25th March 2015 clearly states that improvements in energy efficiency and carbon reductions will be delivered through changes to Building Regulations with only a limited number of optional technical standards that can be required through local plans where supported by specific evidence.

9.1.3 Gladman remain unclear in relation to the evidence the Council are relying upon to support the requirement for a 28% reduction in carbon emissions proposed through Policy CC2. Gladman recommend the Council revisit this proposed policy requirement and ensure they have the necessary evidence to justify its inclusion in the CYLP, otherwise this requirement should be removed.

9.2 Policy CC2 – Sustainable Design and Construction of New Development

9.2.1 Policy CC2 outlines that all new residential buildings should achieve:

- I. At least a 19% reduction in dwelling emission rate compared to the target emission rate;
- II. A water consumption rate of 110 litres per person per day.

9.2.2 Gladman reiterate previous concerns regarding the 19% reduction in dwelling emission rate and recommend that this should be removed from policy.

9.2.3 Gladman also raise concerns regarding the proposed water consumption rate. In this regard Gladman refer to the PPG (ID:56-014-20150327) which states *"Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day."* The Council in paragraph 11.17 outline that the Environment Agency consider York to be an area of

moderate stress for water. Therefore, Gladman are unclear whether there is sufficient justification for the inclusion of this optional technical standard.

9.2.4 Gladman recommend the Council revisit this policy and ensure that it has the necessary justification for the proposed requirements.

9.3 Policy CC3 – District Heating and Combined Heat and Power Networks

9.3.1 Gladman reiterate concerns regarding Policy CC3 and the proposed heating and cooling hierarchy which all new strategic sites must demonstrate that they have been prepared in accordance with. The requirements within this policy would constitute a significant development cost and may well impact on the overall viability of a scheme such that development may not come forward.

9.3.2 Paragraph 173 and 174 of the Framework set out that plans should be deliverable and sites should not be subject to the scale of obligations and policy burdens that their ability to be developed viably is threatened. Therefore, the Council should assess the likely cumulative impacts on development in their area of all existing and proposed local standards and policies through a comprehensive and robust Viability Assessment to ensure that the cumulative impact of these standards and policies do not put the implementation of the Plan at serious risk.

10 CONCLUSIONS

10.1 Key Conclusions

- 10.1.1 Having reviewed the Publication Draft of the CYLP, Gladman have raised a number of concerns and made various suggestions to ensure consistency with national policy. These issues are summarised in Table 1 of this submission.
- 10.1.2 The plan must be positively prepared, effective, justified and consistent with national policy to be found sound at Examination.
- 10.1.3 Gladman support the identification of land at Tadcaster Road, Copmanthorpe (Site SS16) in the Publication Draft CYLP. It is considered that this site does not perform any Green Belt function and has strong and clear defensible boundaries in the East Coast Mainline, A64(T) and existing built up settlement of Copmanthorpe. As a result of these urbanising influences, this site is not a sensitive or tranquil landscape.
- 10.1.4 The site is supported by the local community and is included in the emerging Neighbourhood Plan for Copmanthorpe. It is available, achievable and deliverable and is capable of delivering up to 160 units, including a significant proportion of affordable dwellings. The site will contribute to the Council's 5-year housing land supply in the early part of the plan period.

APPENDIX 1

Land at Tadcaster Road, Copmanthorpe – Development Framework Plan



0 50 100 metres

N

- Site Boundary: 7.56ha
- Proposed residential area: 4.57ha
Up to 160 dwellings @ 35 dph
- Proposed public open space to serve the new development. To include new landscaping, tree planting & new children's play area
- ✳ Potential children's and teenager's play area (NEAP)
- ➔ Proposed vehicular and pedestrian access point
- ➔ Potential emergency and pedestrian access point (if required)
- Proposed spine street through development
- Proposed secondary street
- Proposed private drives/lanes
- Pedestrian priority and key focal spaces
- Potential recreational footways
- ↔ Potential pedestrian/cycle access point
- Existing vegetation
- Potential sustainable drainage basin and swale (SuDS)
- Existing vehicular route
- ✳ Existing traffic calming measure
- Railway line
- ➔ Existing watercourses and waterbodies
- Proposed pump stations

I	16.03.18	RC	Text and Site Boundary amendments
H	13.03.18	RC	Amended to reflect client's comments
G	08.03.18	RC	Amended to reflect client's comments

Rev	Date	By	Description
-----	------	----	-------------

CSA environmental

Diess Barn, High Street, Ashwell, Hertfordshire SG7 5HT

01462 743647
ashwell@csaenvironmental.co.uk
csaenvironmental.co.uk

Project	Land off Tadcaster Road, Copmanthorpe		
Title	Development Framework Plan		
Client	Gladman Developments Ltd		
Scale	1:2500 @ A3	Drawn	RC
Date	Jan 2018	Checked	CA
Drawing No.	CSA/3543/106	Rev	1

APPENDIX 2

Land at Tadcaster Road, Copmanthorpe – Indicative Landscape Plan

1 Sustainable Drainage System (SuDS)

Objectives:

- The swale and balancing pond will create attractive landscape features and integral parts of the development's green infrastructure to both manage storm water and provide attractive new landscape features along the proposed streets;
- The swale will be sown with a species of rich wildflower / grass mix tolerant of periodically damp conditions that will contribute to local biodiversity, naturally infiltrating surface run-off water within the Site through an extensive network of dry attenuation basins along areas of open space and strategic buffers; and
- The balancing pond will provide a permanently wet feature planted with areas of native marginal and aquatic vegetation, with native wetland shrubs and trees to the perimeter to create wildlife habitats.



2 Gateway Landscaping

Objectives:

- Set the development back from Tadcaster Road to the north with a new native hedgerow, tree planting, and an area of public open space to respect and provide an attractive setting for the new homes; and
- Advanced stock cherry trees could be planted along the proposed spine street with the junction of Tadcaster Road to create an attractive approach into the development, improving the existing northern boundary and reflecting the character of Copmanthorpe Conservation Area.



Indicative Species List - Spine Road

Native Species	Common Name
<i>Prunus avium 'Plena'</i>	Wild Cherry
Indicative Species List - Hedge Planting	
<i>Fagus sylvatica</i>	Beech

3 Open Space Corridor

Objectives:

- To create a 20-30m landscaped corridor along the south western boundary to respect the setting of the existing oak trees (TPO trees) along this boundary, and accommodate new landscaping to assist in creating a vegetative edge to the housing adjacent to the Site;
- New homes will front onto the linear open spaces to create overlooking and attractive aspects; and
- The open space corridor will accommodate the route of a recreational footpath that will maintain a key pedestrian linkage between Tadcaster Road and the main vehicular access and the remainder of the public open space.



New dwellings will be set back from the south western boundary to respect the existing TPO trees and avoid future overshadowing

4 Recreation and Play

Objectives:

- The proposed development will include a mix of formal and informal open spaces providing a range of recreational benefits for both new and existing residents;
- If it is proposed to provide a Neighbourhood Equipped Area for Play (NEAP) within the public open space, at the detailed design stage, the NEAP will be designed to offer play opportunities for a variety of ages, and to offer disabled children the same play opportunities as other children;
- The play area will be designed to complement their attractive setting by incorporating natural materials and play elements, timber equipment and new landscaping; and
- Areas of open space and new landscaping will provide a new community asset for informal recreational activities, including walking, picnic areas and informal play. The proposals also include recreational footways, connecting the various areas of open space with the new development.



8 Amenity Landscaping and Public Open Space

Objectives:

- Create landscaped pocket greens, with tree and bulb planting to break up the streetscene and aid legibility through the development;
- Green Corridors will run along the boundaries of the Site, with new tree and hedgerow planting within open space will add to the tree cover and biodiversity of the area;
- The planting of large canopy trees throughout the open space will create a more mature verdant setting and will help filter views of the railway from the development;
- Incorporate recreational footways within areas of open space and create pedestrian links to the adjoining streets and houses;
- Wildflower Meadow planting within the open space will create visual interest with additional bulb planting creating seasonal interest, enhancing biodiversity and habitat creation across the development; and
- The public open space to the eastern part of the development will enhance the adjacent local wetland attenuation area in the north.



Opportunity for new pedestrian access point to connect with the existing infrastructure and local attenuation wetland area

7 Recreational Footways

Objectives:

- Pedestrian footway within the new areas of public open space encompassing the new dwellings will provide key connectors to the existing surrounding footpaths within the local vicinity of the Site;
- This will provide new opportunities for recreation within the site; and
- New potential pedestrian and cycle access points could connect the new development with the attenuation wetland area and further to Askham Bog SSSI to the north.



6 Woodland Edge

Objectives:

- New areas of woodland and thicket will be planted with long grass and wildflower margins that create a well landscaped development edge;
- The woodland will create a visual buffer and act as an acoustic barrier between the development and the railway line along the southern Site boundary;
- Creation of areas of open space that add to existing green infrastructure and enrich local biodiversity;
- Open space will be designed to create new opportunities for passive and active recreation; and
- Areas of open space will be overlooked by new homes to provide attractive aspects and natural surveillance.

Indicative Species List - Woodland with Understorey

Canopy Species	Common Name
<i>Acer campestre</i>	Field Maple
<i>Betula pendula</i>	Silver Birch
<i>Quercus Robur</i>	Oak
<i>Tilia cordata</i>	Small Leaved Lime
Sub-Canopy Species	
<i>Crataegus monogyna</i>	Hawthorn
<i>Cornus sanguinea</i>	Dogwood
<i>Rosa canina</i>	Dog Rose
<i>Viburnum opulus</i>	Guelder Rose

Indicative Species List - Thicket planting

<i>Cornus sanguinea</i>	Dogwood
<i>Corylus avellana</i>	Hazel
<i>Crataegus monogyna</i>	Hawthorn
<i>Ligustrum vulgare</i>	Privet



5 Existing Vegetation

Objectives:

- Existing vegetation will be retained, managed and strengthened on all boundaries where possible to respect the TPO trees on the south western boundary and to filter views of the from the adjacent homes, creating a soft development edge;
- The solitary ash tree will be retained within an attractive area of public open space and form a focal point to the area; and
- A small section of vegetation will have to be removed to allow for the access with Tadcaster Road. This loss of vegetation will be mitigated with new tree and hedgerow planting across the open space.



EXISTING:

- Site Boundary: 7.54ha
- Proposed development area:
- Existing vegetation (To be retained)
- TPO trees (Tree Preservation Order)
- Existing vehicular route
- Existing traffic calming measure
- Railway line
- Existing watercourses and waterbodies

PROPOSED PLANTING:

- Advanced nursery stock tree planting: *Prunus avium 'Plena'*
- Semi-Mature tree planting
- Extra-Heavy tree planting
- Standard tree planting
- Woodland planting with understorey
- Native hedgerow planting
- Wildflower and grassland meadow
- Amenity grass/short mown grassland
- Bulb planting

PROPOSED SUSTAINABLE DRAINAGE:

- Balancing pond
- Swale
- Wetland thicket/marginal planting
- Wetland meadow mix

PROPOSED CIRCULATION:

- Proposed vehicular/pedestrian access point
- Potential emergency and pedestrian access point (if required)
- Potential pedestrian access point
- Potential spine street through the development
- Potential recreational footways

OTHER:

- Proposed pump stations
- Proposed Neighbourhood Equipped Area for Play (NEAP)

Rev | **Date** | **By** | **Description**

Rev	Date	By	Description

CSA environmental

Dixies Barns, High Street,
Ashwell, Hertfordshire SG7 5NT

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W csaenvironmental.co.uk

Project Land off Tadcaster Road Copmanthorpe

Title Landscape Strategy

Client Gladman Developments Ltd

Scale 1:1000 @ A1 | **Drawn** JC

Date April 2018 | **Checked** CA

Drawing No. CSA/3543/111 | **Rev** -

From: Cooke, Alison(City Development)
Sent: 09 April 2018 16:10
To: localplan@york.gov.uk
Subject: FW: policy comments - Heslington

Please log as a response from Cllr. K Aspden on behalf of Rose Hilton:

Please note that this is duly made as I responded to the query and have received further confirmation to log as a rep.

thanks

Alison Cooke | Development Officer

City of York Council | Strategic Planning

Directorate of Economy and Place | West Offices | Station Rise | York | YO1 6GA

www.york.gov.uk | facebook.com/cityofyork | [@CityofYork](https://twitter.com/CityofYork)

From: Cllr. K. Aspden
Sent: 23 March 2018 13:08
To: Cooke, Alison(City Development)
Cc: member.enquiries@york.gov.uk
Subject: policy comments - Heslington

Hello Alison or colleagues

Heslington residents have queried the below two policy comments within the Local Plan.

Any thoughts or response please?

Thank you

Keith

Policy SS13 - ST15 site, key principles

vii. ecological mitigation and compensation measures to be delivered 5 years prior to commencement of development. But elsewhere in document section 3.62 - development to commence 2022 i.e. less than 5 years away?

xiii. states that **It is essential that there is no vehicular transport access to Heslington village along current lanes** (Common, Long, Langwith).

But

xv. provide dedicated secure access for local residents and landowners (and should also say businesses). These two statements are contradictory and require re-wording. xiii needs the phrase "from the new village settlement added after "Heslington Village so

It is essential that there is no vehicular transport access to Heslington village from the new village settlement along current lanes etc

From: Dave Merrett [REDACTED]
Sent: 04 April 2018 17:18
To: localplan@york.gov.uk
Cc: Phil Bixby
Subject: York Environment Forum Transport Group submission on the Local Plan

Dave Merrett has shared OneDrive files with you. To view them, click the links below.

 [YEF TG LP Final submission on transport.pdf](#)

 [YEF TG Covering form on Local Plan.pdf](#)

Please find our submission on the Local plan consisting of two documents:

1. Submission Form
2. Attachment containing our responses to questions 5 & 6 on the form

Would welcome an acknowledgement.

Thanks

Dave Merrett

Chair - YEF Transport Group

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

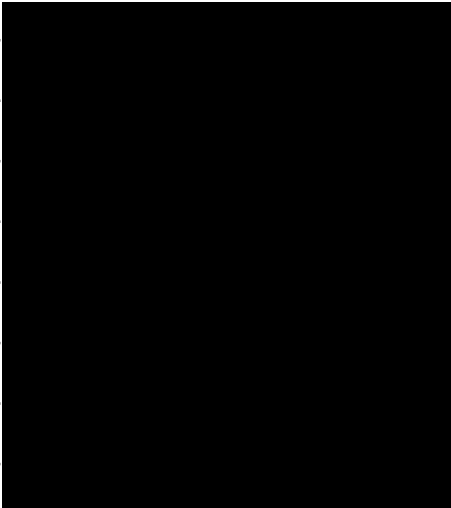
To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr.	
First Name	Dave	
Last Name	Merrett	
Organisation (where relevant)	York Environment Form Transport Group	
Representing (if applicable)		
Address – line 1		
Address – line 2		
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		
E-mail Address		
Telephone Number		

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

- Online via our website www.york.gov.uk/localplan.
- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

YES

Policies Map

YES

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

We haven't examined this question in detail, and are not in a position to comment further.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared Justified
 Effective Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	Section 14 & 15 2.17-20	Policy Ref.	T1-9, DP1 &2, DM1and others	Site Ref.	Various
---------------	----------------------------	-------------	--------------------------------	-----------	---------

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

See attachment.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

See attachment.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We consider that we will bring a mix of expertise and detailed knowledge to the table and of informed challenge to what the plans authors and other representors have to say.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

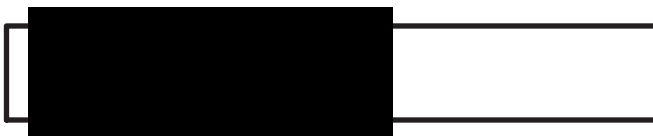
We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature



Date

4th April 2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

York Environment Forum Transport Group
Attachment: Response on transport aspects of the draft Local Plan
4th April 2018

1. Failure to analyse the transport challenges faced by the city

Key paragraph: 1.62-66

Other references: 14.1-3, 14.15-23, 14.40-43, 15.15-17

Q5 The summary of the transport context and the resulting transport policies are not grounded on any comprehensive analysis of the transport challenges facing the city now and in the lifetime of the Local Plan, as a result of underlying trends and the development envisaged in the Local Plan. A clear analysis is needed of the expected impacts on congestion, accessibility, the environment and public health, and of the remedial measures necessary to overcome these problems. The proposed transport policies should then be presented as means to overcome these problems.

The only analysis offered is in the 2017 Transport Topic Paper, whose results are presented in paras 15.15-17. This is out of date, in that it does not reflect the changes in the Plan since mid 2017. More importantly, it is incomplete, in that it has solely estimated delays in the absence of remedial measures rather than, as specified in government guidance, subsequently identifying and assessing remedial measures. As a result it takes no account of measures to design developments to reduce the need to travel, of enhancements to walking and cycling, of demand management measures or, in most cases, of public transport improvements. As a result, it grossly over-estimates the additional traffic delays likely to be generated by the proposed new development, and fails to demonstrate or recommend what measures for non-car modes should be included in the Plan and why. Since the projections envisage a 55% increase in delay as a result of the planned developments, these are unacceptable omissions.

Q6 Prior to the Examination in Public, the Council needs to update and complete the analysis in its Transport Topic Paper. In doing so, it needs to assess the transport implications of underlying trends and proposed new development against the full range of objectives of its transport policy, develop a holistic strategy that tackles the predicted problems through a combination of measures to reduce the need to travel and reduce car use, and demonstrate that its proposed transport policies and standards are the most cost-effective means of meeting those objectives. This analysis needs to be available for review in good time before its presentation at the Examination in Public. The resulting implications need to be reflected in major revisions of paragraphs 1.62-66 and 14.1-3.

Supporting papers Local Transport Guidance, 2009. Sustainable Urban Mobility Plan Guidance, 2014. EC Guidance on Measure Selection, 2016.

2. Failure to address the full range of policy objectives of concern to transport

Key paragraphs: 2.16, 14.1-2

Other references: 1.2, 1.13-21, 1.66, 1.67, 2.14, 3.1, 12.2-3, 114.16, 15.22-27 and Table 15.2

Q5 The transport policy statements should be justified throughout on the basis of a full set of policy objectives, which in turn should reflect those in the SEA. Transport policies should contribute to economic vitality, public health, safety, protection of the natural environment, reduction of severance, and improved access for the transport disadvantaged. All of these objectives can be found somewhere in the Plan, but they are not consistently presented as a justification for the transport policies. Assessment against these objectives is only realistic if each is specified in terms of outcome indicators and targets. At present the Local Plan (Table 15.2) contains no outcome indicators to reflect any of the transport policy objectives other than, indirectly, air quality. The only indicators offered are output ones such as progress in delivery of road schemes. Such an approach falls very far short of accepted good practice.

Q6 Para 2.16 needs to be redrafted to reflect the wider objectives of economic vitality, accessibility, public health and equity. Subsequent references to transport policies need to demonstrate that all of these objectives are being effectively addressed in the most cost-effective way. Achievable outcome targets need to be set for each of these objectives, and the Plan needs to be monitored against them. All such targets need to be added to Table 15.2.

Supporting papers Local Transport Guidance, 2009. Sustainable Urban Mobility Plan Guidance, 2014. EC Guidance on Monitoring and Evaluation, 2016.

3. Reliance on an out of date Local Transport Plan

Key policies: Policies T2, T4, T5; paragraph 14.3

Other references: 14.18

Q5 The transport policies are based throughout on the 2010 Local Transport Plan (LTP3). This is out of date, inappropriate to the vision set out in the Local Plan, and has failed to achieve its planned reduction in congestion. (Congestion levels in York are 24% above the England average and 41% above that for Yorkshire, and are rising faster than either.) LTP3 specified implementation over the period 2011-16, but only set the broad context for policy beyond 2016. It was incomplete in its coverage of transport policy measures, and since its publication there has been an increase in the range of technologies and policy measures available. The Local Plan (and in due course LTP4) need to reflect the potential of all of these measures. In particular it should ensure that development facilitates the use of shared and connected vehicles, smart travel, low emission vehicles, new light rail technology, district delivery points, and freight management more generally. We understand that the Council intends to start work on a new LTP (LTP4) in early 2019. During the lifetime of the Local Plan it might be expected that this will be updated further. Moreover, the new Transport for the North Strategic Transport Plan will set the context for policy measures such as infrastructure, smart travel and freight.

Q6 The Local Plan should acknowledge that LTP3 is now out of date and that LTP4 is in preparation. All references to adherence to, and consistency with, the Local Transport Plan should refer to the version of the LTP which is current at the time that a relevant decision is made. Reference also needs to be made to the TfN Strategic Transport Plan.

Supporting papers City of York Local Transport Plan 3, 2010. DfT data on delays on locally managed A roads, 2018. TfN draft Strategic Transport Plan, 2018.

4. Failure to adhere to the Council's hierarchy of transport users

Key paragraph: 14.18

Other references: None that we have identified.

Q5 LTP3 adopted, as a strategic structure, a hierarchy of transport users, which placed provision for pedestrians, cyclists and public transport users, in that order, above provision for commercial vehicle traffic and private cars. We strongly endorse that hierarchy, and recommend that it forms the basis for the emerging LTP4, and for the Local Plan. However, the draft Local Plan only makes one passing reference to this hierarchy in para 14.18. While some policies on new developments (SS9, 10, 12, 13, 22) propose a target of 15% of journeys by public transport, no evidence is offered to justify that target; nor is any target offered for walking and cycling. Moreover, these targets are too low to reflect an emphasis on sustainable travel; similar new developments in European cities are achieving sustainable mode shares in excess of 80%. To reinforce this sense of limited aspirations, there is a clear emphasis in the investment programme in Policy T4 that solutions will where possible be based on increases in capacity for private cars and commercial vehicles.

Q6 The hierarchy should provide the basis for the definition of sustainable development and sustainable communities in Policies DP2 and DP3. All transport policy measures should be selected and implemented following the hierarchy of users on which LTP3 is based, reflecting the principles of sustainable travel. This approach should determine the measures to be included under Policies T2, T4, T5 and T8, and the prioritisation in investment between these three transport policies. Based on the resulting strategy, a much more challenging target should be set for the proportion of journeys by sustainable modes.

5. Adoption of an incomplete set of policy interventions and an inappropriate schedule

Key policies: T2, T4, T5, T8

Other references: 14.16, 14.18, 14.36-38, 14.40, 14.41, 14.57

Q5 Policies T2, T4, T5 and T8 provide statements separately on public transport, highways, walking and cycling and demand management. No similar policies are offered on freight and servicing. There is no overview of these policies, nor any indication of how measures in one policy might complement those in another. Yet it is generally accepted that a challenge as great as the predicted 55% increase in congestion (paras 15.15-17) can only be met by a holistic set of transport policy measures including land use, public transport, walking and cycling, road network improvements, freight management and demand management.

All of these policies specify measures to be adopted and, in the first three cases, a timetable. In the absence of an up to date LTP, these measures are inevitably incomplete, but they also fail to include many of the measures specified in the current 2005 Development Control Policies. This in turn gives the impression that the omitted measures are no longer deemed appropriate, yet there has been no publicly available analysis to justify this. Moreover, the categorisation of measures by time period of implementation is often inappropriate. In particular the actions to limit car use in the city centre in favour of public transport and to provide effective cycle routes through the city centre should be implemented in advance of any upgrade of the outer ring road junctions to ensure that the city benefits from any resulting increase in capacity. At present these measures are relegated to implementation after 2027.

Q6 In the absence of an up to date Local Transport Plan, reference to specific measures and their timing in Policies T2, T4 and T5 would be better omitted and replaced by a commitment to determine an appropriate set of measures and timeframe in the forthcoming LTP4. As an alternative the text in the current Development Control Policies should be used. A new policy on freight and servicing should be added.

Supporting papers Local Transport Guidance, 2009. Sustainable Urban Mobility Plan Guidance, 2014. EC Guidance on Measure Selection, 2016. Development Control Policies, 2005. Potentially additional references are the York Bus Forum, the Walk and Cycle Forum and York Cycle Campaign submissions.

6. An insufficient set of design principles for new developments

Key policies: T1

Other references: DP2, DP3, SS1, R4, H2, DW7, 2.15, 3.12, 5.17, 14.2, 14.4-14

Q5 The design principles for new developments in order to reduce the need to travel and to reduce car use are necessary but not sufficient. In particular, development needs to be of mixed use and high density; with new development designed around high quality walking areas and cycling routes; and with those routes providing short, safe and convenient links to a core set of community facilities including schools, shops, leisure facilities and personal services. It also needs to be designed to manage servicing traffic and to accommodate appropriate emerging transport technologies.

Q6 Policy T1 and its supporting paragraphs should be redrafted to include the three principles specified above. Policies DP3 on sustainable communities, SS1 on delivering sustainable growth, R4 on out of centre retail and HW7 on healthy places should also reflect these principles. In particular, the wording in SS1 "Ensuring accessibility to sustainable modes of transport and a range of services" should be expanded to say "'Giving priority to locations that maximise the use of walking, cycling and public transport, and minimise traffic generation", and "Ensuring accessibility to a range of local services by foot, cycle and public transport, and to high quality public transport and segregated, direct cycling / walking links to other destinations within the city". The development densities in Policy H2 should be reviewed to ensure that they are consistent with these principles, and more closely tied to the provision of public transport services. The phrase "where reasonable to do so" should

be omitted from para 14.2; no development should be accepted which fails to facilitate the use of more sustainable modes of transport.

7. An over-reliance on providing additional highway capacity

Key policies: T4

Other references: DP2, SS11, SS12, SS13, SS22, 1.64, 3.12, 3.61, 3.66, 14.36-8, 15.17

Q5 The provision of additional highway capacity on its own is not an effective solution to the problems of travel growth. Yet the draft Local Plan appears to suggest that other policies will only be adopted “if this demand cannot be met by increasing highway capacity alone” (para 3.12). There is extensive evidence that new road capacity will attract additional travel. If new capacity is to be provided on the outer ring road it needs to be introduced in parallel with measures to reduce traffic in central and inner York, so that the additional capacity is used to ameliorate conditions within the city. At the same time, new cycling, walking and public transport infrastructure must be provided to avoid the imposition of severance on radial movements by other modes, including grade separated facilities at the outer ring road junctions.

The inclusion of the full dualling of the Northern / Western Outer Ring Road is unsound. In addition to the general principle above that it would attract yet further traffic, the high cost and low added benefit (as compared with the proposed upgrading of the current roundabouts) implies that the scheme would be unlikely to attract Government funding, and would be beyond the reach of the Local Authority to fund itself. Were funding to become available, the scheme would still represent a much less cost-effective use of public funds than the many other competing measures in the transport portfolio.

Q6 While Policy T4 must reflect road infrastructure schemes already committed, it needs to be phrased to demonstrate an appreciation of the limited benefits of such investment, and the need for other measures, particularly under Policy T8, to ensure that the additional capacity is used for the benefit of the city. Within individual development sites, and particularly Policies SS12, 13 and 22, new access routes to the regional road network should not be provided, since these are likely to stimulate their use as dormitory villages. The reference to the full dualling of the outer ring road should be omitted, and no development should be accepted which requires such dualling. Policy T4 also needs to include a commitment to providing facilities to overcome the severance effect of new roads on routes for walking, cycling and public transport.

Supporting papers 2008 Halcrow Study on options for the York Northern Outer Ring Road. 2014 Parsons Brinkerhoff “Local Plan Transport Infrastructure Investments Requirements Study”. SACTRA and more up to date research reports demonstrating the traffic generating impact of new roads.

8. A wholly inadequate approach to demand management

Key policies: T8

Other references: 14.53-9, 15.15-19

Q5 Policy T8 covering demand management is wholly inadequate, particularly when set against the prediction of a 55% increase in congestion as a result of the planned new development. It principally considers parking standards, but limits these to long stay parking, and is therefore a significant backward step from the current Development Control Local Plan (2005) which has a comprehensive approach covering all city centre parking (public off street, private non-residential and on street). The standards proposed are not specified; instead reference is made to a York Parking Strategy review which we understand has yet to be published. As the Development Control Policies (para 6.58) demonstrate, public parking provision is dwarfed by private non-residential parking in and close to the city centre. Thus any reliance for demand management on the control of long stay public off-street space is doomed to failure.

There is in practice a much wider range of demand management measures, including selective road closure and road space reallocation, workplace parking levies, road pricing and policies to reduce freight and servicing traffic. The potential of some of these measures was assessed in the 2011 City Centre Movement and Access study, to which no reference is made. Given the projections of additional travel, all of these measures need to be assessed and most can be expected to be included as part of LTP4.

Q6 Policy T8 needs to be completely rewritten, based on a critical assessment of the need for demand management to contribute to the wider objectives of the transport policy, and a series of recommendations on the application of each of the potentially available demand management measures. As a contribution to this, and in advance of the preparation of LTP4, the statement on parking policy within the current Development Control Policies 2005 should be incorporated into the Local Plan.

Supporting papers Local Plan (Development Control) Policies, 2005. JMP City Centre Movement and Access Study, 2011.

9. Lack of transparency on design standards and policy thresholds

Key paragraphs: e.g.: Policies T1, T7, 14.9, 14.13, 14.49

Other references: Several; this comment should be applied wherever standards and policy thresholds are implicit.

Q5 Design standards and policy thresholds are referred to throughout the Local Plan, but are never specified; instead they are to be set out in the relevant Supplementary Planning Document, which is not yet available. Examples include minimum frequencies for public transport, safe walking and cycling distances, parking standards, and requirements to provide a Transport Assessment or Travel Plan. As a result it is impossible to judge the potential effectiveness, and hence soundness, of the Local Plan. The 2005 Development Control Policies specify a number of such standards and no explanation is given for their omission from the draft Local Plan.

Q6 The Supplementary Planning Document needs to be published in time for its implications to be fully assessed in advance of the Examination in Public. Failing that, the

standards specified in the Development Control Policies, 2005 should be incorporated into the Local Plan.

Supporting papers Local Plan (Development Control Policies) 2005

Specific points

10. York city centre

Key policies: SS3

Other references: 3.18-21

Q5 While the emphasis on the needs of pedestrians is to be welcomed, there needs to be a commitment to extending the area covered by footstreets, extending their operating hours and removing traffic from them, and substantially upgrading and then maintaining the quality of the public realm. The absence of such measures can be expected to lead to a further decline in visitor numbers. The upgraded gateways to the city centre need to include improved links to public transport hubs and new developments at York Central and Castle Gateway, and high grade protected crossings to give pedestrians priority over traffic. Bus services also need to be enhanced as a key access mode for the city centre, with a simplification of the route network, designation of one or more bus interchanges in addition to the station, and protection of the space required for such provision.

Q6 Policy SS3 needs to be redrafted to reflect these points.

Supporting papers JMP City Centre Movement and Access Study, 2011.

11. York Central

Key policies: SS4

Other references: 3.25-28

Q5 While the transport proposals here are necessary, they are not sufficient, or reflective of the emerging Masterplan for the site. There needs, in addition, to be a commitment to low maximum parking standards reflecting the high accessibility of the site, provision of parking and servicing in designated central sites rather than in individual buildings, new walking and cycling infrastructure to overcome the severance caused by rail lines, and closure of the two rail bridges on Leeman Road to general through traffic to ensure that the site is compliant with Policy T1 and para 14.5.

Q6 Policy SS4 needs to be redrafted to reflect these points.

Supporting papers York Civic Trust policy paper on York Central.

12. Castle Gateway

Key policies: SS5

Other references:

Q5 While the transport proposals here are necessary, they are not sufficient, or reflective of the emerging Masterplan for the site. There needs in addition to be reference to closing Coppergate eastbound, linking Piccadilly to the foot streets network, reducing the carriageway width on Tower St North, providing the planned super crossing of the Tower St dual carriageway and linking it to the new pedestrian and cycle routes planned along and across the River Foss. While the commitment to closing the Castle Car Park and relocating parking on St George's Field is welcomed, there needs to be an objective assessment of the parking needs of the area and a commitment to providing no more than the necessary parking in a low-rise structure which does not intrude into the riverside area. The reference to rebuilding parking provision at Castle Mills should be omitted.

Q6 Policy SS5 needs to be redrafted to reflect these points.

Supporting papers York Civic Trust response to Castle Gateway consultation.

13. Developments outside and close to the outer ring road

Key policies: SS10, 11, 12, 13, 19, 21, 22

Other references: T1

Q5 These developments between them risk adding significantly to vehicular traffic and congestion on York's road network. None of them adheres fully even to the design principles for new developments specified in Policy T1; Policies SS11, 19 and 21 make no reference at all to public transport provision. The others propose a target of 15% of journeys by public transport; no evidence is offered to justify that target; nor is any target offered for walking and cycling. Moreover, these targets are too low to reflect an emphasis on sustainable travel. As we have noted elsewhere, the design principles in Policy T1 are necessary but not sufficient. In particular, development needs to be of mixed use and high density; with new development designed around high quality walking areas and cycling routes; and with those routes providing short, safe and convenient links to a core set of community facilities including schools, shops, leisure facilities and personal services. It also needs to be designed to manage servicing traffic and to accommodate appropriate emerging transport technologies. Three of the sites, under Policies SS12, 13 and 22, propose direct links to the outer ring road. There is ample evidence that such provision promotes the development of dormitory villages for commuters to remote employment areas, which will aggravate traffic problems and not contribute to the economy of the city.

Q6 Each of these Policies must be based on the full set of design principles for promoting sustainable travel, and include a much more challenging target for the proportion of journeys by sustainable modes. In addition:

- Policy SS10 should consider extending park and ride services to the site
- Policy SS11 should commit to extending the current bus service to the site, the construction of Haxby station and the provision of a high frequency service there, and minimise the need for additional vehicular traffic through Haxby village

- Policy SS12 should omit the reference to provision of a direct link to the A1237 and instead focus on providing a new Clifton Moor park and ride site adjacent to the development, with high quality frequent bus services through Clifton Moor to the site using a grade separated crossing of the A1237
- Policy SS13 should omit the reference to a new junction on the A64 (and be rejected if it is dependent on such a junction) and instead provide a high quality frequent bus services through the University to the site using a grade separated crossing of the A64, and a dedicated link to, or extension of, the Grimston Bar park and ride service
- Policy SS19 should commit to extending the current bus service to the site and to a new station at Strensall, and the provision of a high frequency service there
- Policy SS21, which currently makes no provision for transport, should adopt the modifications listed above for Policy SS13
- Policy SS22 should omit the reference to a new junction on the A64 and commit to the provision of a high quality frequent bus service through the University servicing sites ST15 and 26 (Policies SS13 and 21).

14. Loss of employment land

Key policies: EC2

Other references:

Q5 City centre offices facilitate the provision for and use of sustainable travel. Yet York has experienced one of the highest rates of decline in such office space following the introduction of freedom to convert to residential use. A policy to arrest and reverse this decline would contribute significantly to the achievement of sustainable travel goals.

Q6 Policy EC2 needs to be redrafted to reflect these points.

15. Out of centre retailing

Key policies: R4

Other references:

Q5 Out of centre retailing has been designed to be car-based and in doing so has added significantly to traffic levels and congestion, as well as attracting retailers and shoppers to leave the city centre, thus further aggravating transport problems. The criteria for accepting further out of centre retailing make no reference to these impacts and are thus likely to support further such development. The set of criteria for provision for sustainable travel in Policy T1, as strengthened by our recommendations for this policy, need to be applied to out of centre retailing as well.

Q6 Policy R4 needs to be redrafted to reflect these points.

16. Public transport provision

Key policies: T2

Other references:

Q5 As noted in our general comments, the list of new public transport schemes is incomplete. Specific omissions include:

- the planned high frequency bus services through York Central
- additional stations at the Hospital, Strensall and Poppleton Business Park
- a high frequency tram-train service for these stations and Haxby
- provision for bus priority, including additional infrastructure to support it (such as the Clarence Street / Lord Mayor's Walk Junction, Stonebow)
- priority bus access in both directions to all enhanced junctions on the A1237
- a new rail route for the Harrogate line to access York Station
- park and ride sites at Clifton Moor and on the Wetherby Road.

There is also a wider set of schemes listed in the 2014 SDG York Bus Network Review which doesn't appear to have been taken into account.

Policy T2 also refers to the protection of disused rail alignments. This statement is unduly complex. Most such alignments have already been reused for the purposes listed. The policy should be simplified to say that any remaining disused rail alignments should be protected for future use for transport and/or green space.

Q6 Policy T2 should ideally be expanded to reflect the full list of schemes to be proposed in LTP4. Failing that it needs to be redrafted to include the schemes listed above and those contained in SDG study An alternative fall back would be the earlier Local Plan (Development Control) Policies, 2005. The section on disused rail alignments needs to be simplified as suggested.

Supporting papers Local Plan (Development Control) Policies, 2005. Steer Davies and Gleave York Bus Network Review 2014. A potential additional reference is the York Bus Forum submission.

17. York station

Key policies: T3

Other references:

Q5 While we welcome the commitments in the policy on York Station, the following should also be added:

- provision of new platforms for the Harrogate line services
- enhanced priority access to southbound buses on Queen St.
- improved facilities for southbound bus stops to match those provided northbound
- taxi and bus access to the NW side of the station via York Central.

Q6 Policy T3 needs to be redrafted to reflect these points.

18. Walking and cycling

Key policies: T5

Other references:

Q5 The list of strategic cycle and pedestrian improvements listed here is incomplete and fails to address key inadequacies in the connectivity and capacity of the current networks. It offers no overall strategy to deliver a comprehensive high quality cycling or walking network that would achieve a significant modal shift to walking and cycling, and hence relief of congestion. Specific omissions include:

- extension of the upgraded route across Scarborough Bridge to serve Bootham and the Hospital
- additional infrastructure to overcome severance caused by railway lines and watercourses, including new bridges between Poppleton Rd and York Central and between British Sugar and Poppleton Business Park, and North Street and Coney Street
- measures to protect the existing cycle and walking networks
- further development of orbital routes
- priority provision for pedestrians and cyclists at junctions to reflect the hierarchy of users
- provision for enhanced cycle parking in major activity areas.

There is also a wider set of schemes listed in the Development Control Policies, 2005.

Q6 Policy T5 should ideally be expanded to reflect the full list of schemes to be proposed in LTP4. Failing that it needs to be redrafted to include the schemes listed above and those contained in the Development Control Policies, 2005.

Supporting papers Local Plan (Development Control) Policies, 2005. Potentially additional references are the Walk and Cycle Forum and York Cycle Campaign submissions.

19. Freight policy

Key policies: T9

Other references:

Q5 Policy T9 is confusing in that it combines two very different facilities: alternative fuel filling stations and freight consolidation centres. The latter is the only reference to freight policy in the whole document. This is unacceptable, in that it fails to recognise the problems caused by the growth in home delivery traffic, the conflicts between pedestrians and servicing traffic, and the use of inappropriately sized commercial vehicles in York's mediaeval streets, or to reflect the availability of new technologies for managing these problems. The question of a freight consolidation centre has been debated for some

considerable time, and a commitment is now needed to selecting a site and implementing it within the implementation period covered by the next LTP. It also omits any reference to protecting the important lorry stopover facility at Murton, which both benefits drivers and helps to prevent inappropriate lorry parking in the city.

Q6 Policy T9 should be split into its two separate parts. That on freight needs to be replaced by a freight policy which addresses the concerns above, including the continuation of the stopover lorry park at Murton. If necessary it should commit the Council to such a review as part of the development of LTP4, and refer forward to the resulting policy.

20. Inappropriate qualifiers

Key policies: T1, T2, T8

Other references: 14.5, 14.9, 14.10, 14.14, 14.18

Q5 At several points, particularly in Policy T1, qualifications are added which limit the applicability of the policy and risk undermining the effectiveness of the Local Plan.

Examples are:

- “In applying this policy it is recognised that in some circumstances developments will not be able to achieve these criteria” (T1): new developments should not be countenanced where they are not able to meet these criteria.
- “Roads providing a new direct vehicular through route will generally not be supported” (para 14.5): the word “generally” should be omitted.
- “unless the developer can demonstrate (that) this [public transport provision] is not a viable option in terms of practicality and cost” (para 14.10): new developments should not be countenanced where public transport cannot be provided.
- “Unless it can be demonstrated that it would undermine the viability of developments, a recharging point should be provided” (para 14.14): developments should not be countenanced where it is not possible to provide recharging points.
- “(Park and ride) sites should, ideally, be well signed ...” (para 14.18): the word “ideally” should be deleted; these are essential requirements for the design of park and ride sites.
- “Parking Standards ... may be amended to suit local conditions” (para 14.55): since parking standards should specify low maximum levels, there should be no need for amendment.

Q6 The texts specified should be amended as above.

From: Cllr. S. Mercer
Sent: 04 April 2018 17:24
To: localplan@york.gov.uk
Subject: Local Plan Publication Draft 2018 Response

Please find attached my Local Plan Publication 2018 response.

Regards
Suzie



Local Plan
onsultation 2018 R

Cllr. Suzie Mercer
Wheldrake Ward
Mobile: 07709 343577 e-mail cllr.smercer@york.gov.uk

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**City of York Local Plan
Publication Draft 2018
Consultation response form
21 February – 4 April 2018**

OFFICE USE ONLY:

IC reference

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information


To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mrs	
First Name	Suzie	
Last Name	Mercer	
Organisation (where relevant)	CYC Ward Councillor	
Representing (if applicable)	Wheldrake Ward and Whe drake Parish Council	
Address – line 1		
Address – line 2		
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		
E-mail Address		
Telephone Number		

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence in support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

- Online via our website www.york.gov.uk/localplan.
- City of York Council West Offices
- In all libraries in York.

Part B - Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Residents do not feel that their submissions with regard to the previous consultation period have been taken into consideration and therefore the Plan is unsound as it is not representative of local peoples' views.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's 'our tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph
no

Policy
Ref.

Site Ref.

ST33

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Following a consultation with villagers, there is overwhelming objection to the size and scale of the proposed development at Station Yard, ST33, as it is completely inappropriate for Wheldrake. As proposed ST33, would place an unacceptable and unjustifiable pressure on current infrastructure and services; many of which have already been stretched beyond their current capacity. This includes the village school, which has for some time been unable to accommodate all the eligible School aged children. The proximity of the development to the industrial estate is also an issue. A planning application for that part of ST33 nearest to the industrial estate has been rejected in the past for reasons of potential noise and other impacts on proposed adjacent properties.

A significant proportion of ST33 is located on good quality agricultural land and also within the currently recognised Green Belt. Past proposals for housing in this area were rejected in the adopted local plan of 1979 and in subsequent draft plans prior to 2014. Also during draft Green Belt boundary review proposals to remove the green field part of this area was rejected.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

The current plan should reference and include as part of its evidence base the CYC Draft Local Plan 2005 that was approved and formerly adopted for Development Control purposes along with the draft York Green Belt Local Plan and the Inspector's report from the York Green Belt Public Inquiry. Once this has been included all sites that conflict with the already detailed sections of the Outer Green Belt boundaries should be removed from the Local Plan

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Part of the evidence base supporting the Local Plan is a Statement of Community Involvement, residents do not feel that their concerns have been taken into account. Residents' comments and concerns should be raised and either taken on board or allayed and this would be an opportunity for their voice to be heard. In addition to which many residents have not received any of the correspondence issued regarding the consultation and therefore it cannot be considered to be a true representation of all views if they have been unable to respond

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part B - Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Residents do not feel that their previous submissions with regard to the previous consultation period have been taken into consideration and therefore the Plan is unsound as it is not representative of local peoples' views

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2)

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph
no.

Policy
Ref.

Site Ref.

ST15

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question

The residents do not feel they have been properly consulted regarding their needs.
The Local Plan therefore is unsound as it does not reflect local public need or opinion
and has not taken account of previous consultation exercises.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

The proposed development ST15 (Langwith) is currently undeliverable, unviable, unsustainable and unacceptable ecologically. The developers have put forward a revised size and shape for the site which is deliverable, viable, sustainable and is ecologically friendly. With the increase in size the developers would install a new junction from the A64 to service the site which would give less traffic on existing roads making the impact on less of an impact on existing residential properties. The proposed development despite the loss of Green Belt would be preferable to other proposed developments 'bolting on' to existing villages and further burdening existing already at breaking strain infrastructures.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation.

Yes, I wish to appear at the examination.

✓

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Part of the evidence base supporting the Local Plan is a Statement of Community Involvement. Residents do not feel that their concerns have been taken into account. Residents' comments and concerns should be raised and either taken on board or allayed and this would be an opportunity for their voice to be heard. In addition to which many residents have not received any of the correspondence issued regarding the consultation and therefore it cannot be considered to be a true representation of all views if they have been unable to respond.

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Part B - Your Representation

(Please use a separate Part B form for each issue that you want to raise)



3. To which document does your response relate? (Please tick one)

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Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Residents do not feel that their submissions with regard to the previous consultation period have been taken into consideration and therefore the Plan is unsound as it is not representative of local peoples' views.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

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Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

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Representations received after this time will not be considered duly made.

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4), if no, go to question 5.(2)

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared Justified
 Effective Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Rel.

Site Ref.

E8

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Site E8 is not appropriate for inclusion as it would be situate on land at the entrance to the village of Wheldrake which also coincides with the commencement of the Conservation Area and it would therefore have a detrimental effect on the setting and character of the village. This area of land also provides a green space entrance-way and community space for the village

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Remove E8 from the plan and/or designate it as Green Space within the Village and re-instate E7 which was previously allocated and would help preserve the character and setting of the village

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination.

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Part of the evidence base supporting the Local Plan is a Statement of Community Involvement, residents do not feel that their concerns have been taken into account. Residents' comments and concerns should be raised and either taken on board or allayed and this would be an opportunity for their voice to be heard. In addition to which many residents have not received any of the correspondence issued regarding the consultation and therefore it cannot be considered to be a true representation of all views if they have been unable to respond

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

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Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law. The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145).

Signature

Date

4th April, 2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England Regulations 2012

From: Steven Longstaff [Steven@elgplanning.co.uk]
Sent: 04 April 2018 17:19
To: localplan@york.gov.uk
Cc: jonathan.abbott@taylorwimpey.com
Subject: Representations on behalf of Taylor Wimpey UK Ltd - Land at Galtres Farm
Attachments: SS2 - TW UK Ltd.pdf; CC1 - TW UK Ltd.pdf; CC2 - TW UK Ltd.pdf; CC3 - TW UK Ltd.pdf; H1 - TW UK Ltd.pdf; H3 - TW UK Ltd.pdf; H4 - TW UK Ltd.pdf; SS1 - TW UK Ltd.pdf

Dears Sirs,

Please find attached representations to polices SS1, SS2, H1, H3, H4, CC1, CC2 and CC3 on behalf of Taylor Wimpey Ltd.

I would be grateful if you could confirm receipt.

Regards

Steven

Steven Longstaff, MRTPI
Associate



01325 469 236
07725 970 806
Gateway House, 55 Coniscliffe Road, Darlington Co. Durham, DL3 7EH
@ELGPlanning
www.elgplanning.co.uk

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	Mr
First Name	Jonathan	Steven
Last Name	Abbott	Longstaff
Organisation (where relevant)	Taylor Wimpey UK Ltd	ELG Planning
Representing (if applicable)		Taylor Wimpey UK Ltd
Address – line 1	C/O Agent	Gateway House
Address – line 2		55 Coniscliffe Road
Address – line 3		Darlington
Address – line 4		
Postcode		DL37EH
E-mail Address		steven@elgplanning.co.uk
Telephone Number		01325 469236

Guidance note



Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

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What can I make comments on?

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Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

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Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

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- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

N/A

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph
no.Policy
Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Taylor Wimpey UK Ltd object to the current wording of Policy CC1, as issues relating to energy efficiency are now solely the remit of Building Regulations as clearly stated by the Ministerial Statement on 25th March 2015. As such, the requirement to reduce carbon emissions by 28% will place unnecessary financial burdens on new developments.

This requirement is unjustified and does not accord with national planning policy and is therefore unsound.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Remove the first paragraph from the policy and the corresponding supporting text.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

TW have fundamental objections to Policy CC1 as set out above on matters which need to be addressed as part of a Hearing session.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Representations must be received by Wednesday 4 April 2018, up until midnight.
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Part C - How we will use your Personal Information



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Signature

S Longstaff

Date

04/04/2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

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Do I need to attend the Public Examination?

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

N/A

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

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Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework



5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared **Justified**
Effective **Consistent with national policy**

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Taylor Wimpey UK Ltd object to Policy CC2 as it is not justified nor is it consistent with national policy.

As with Policy CC1, these matters are solely the remit of Building Regulations as set out in the Ministerial Statement on 25th March 2015. The proposed requirements will place additional unnecessary financial burdens on development and in view of the fact the Government has amended Building Regulations to include the applicable energy standards, the Council should not be imposing more onerous requirements on developments.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

In line with HBF response, TW would suggest that the following modifications are required to make the policy sound.

All new residential buildings should achieve:

- i. ~~at least a 19% reduction in Dwelling Emission Rate compared to the Target Emission Rate (calculated using Standard Assessment Procedure methodology as per Part L1A of the Building Regulations 2013); and~~*
- ii. ~~a water consumption rate of 110 litres per person per day (calculated as per Part G of the Building Regulations).~~*

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

TW have fundamental objections to Policy CC2 as set out above on matters which need to be addressed as part of a Hearing session.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Representations must be received by Wednesday 4 April 2018, up until midnight.
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Part C - How we will use your Personal Information



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Retention of Information

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Signature

S Longstaff

Date

04/04/2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

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Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	Mr
First Name	Jonathan	Steven
Last Name	Abbott	Longstaff
Organisation (where relevant)	Taylor Wimpey UK Ltd	ELG Planning
Representing (if applicable)		Taylor Wimpey UK Ltd
Address – line 1	C/O Agent	Gateway House
Address – line 2		55 Coniscliffe Road
Address – line 3		Darlington
Address – line 4		
Postcode		DL37EH
E-mail Address		steven@elgplanning.co.uk
Telephone Number		01325 469236

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Guidance note



Where do I send my completed form?

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- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
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What can I make comments on?

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Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

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Can I submit representations on behalf of a group or neighbourhood?

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Do I need to attend the Public Examination?

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In all library

Part B - Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)

3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

N/A

What does 'Sound' mean?

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5.(1) Do you consider the document is Sound?

Yes No

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Positively prepared **Justified**
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Paragraph no.

Policy Ref.

Site Ref.

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Taylor Wimpey UK Ltd object to Policy CC3 as it is not justified and therefore not sound as the Council have not considered whether the delivery of decentralised energy network are feasible on the proposed strategic allocation nor have they considered the financial cost of providing them and implications of this on the delivery of housing.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

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Delete policy.

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Signature

Date

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Last Name	Abbott	Longstaff
Organisation (where relevant)	Taylor Wimpey UK Ltd	ELG Planning
Representing (if applicable)		Taylor Wimpey UK Ltd
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(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

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Yes

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4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

N/A

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5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared Justified
 Effective Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	<input type="text" value="H1"/>	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Taylor Wimpey UK Ltd object to Policy H1 as it is not consistent with two key requirements of the NPPF; to provide sufficient housing allocations to significantly boost the supply of housing and to meet the objectively assessed needs of the City over the plan period. As set out in relation to Policy SS1, TW have significant objections to the Council's suggested housing requirement.

Housing Land Supply

The representations prepared by Lichfields (appended to these representations) on behalf of a number of housebuilders including (Taylor Wimpey UK Ltd) provides a detailed assessment of the Council's suggested supply and raised a number of significant issues as summarised below:

- The Council has not produced a detailed trajectory or a detailed assessment of the 5-year housing land position nor has it provided a detailed trajectory for the plan period;
- The Lichfields assessment confirms that the Council is unable to demonstrate a 5 year housing land supply based on its own suggested housing requirement (867 dwellings per annum). The plan is therefore unsound as the Council cannot demonstrate a 5 year housing land supply on adoption; and
- The 5 year supply position is significantly worse when using the SHMA OAHN and Lichfields' position.

With regards to the Plan period housing supply para. 9.7 confirms that:

'there is also a significant shortfall of housing over the Plan period, when assessed against the Lichfields OAHN of 1,150 dpa dwelling shortfall in delivery for period the period 2012 to identified in Table 7.2 (a total figure of 20,898 dwellings over the Plan period to 2033). LPP Table 5.2 indicates a supply of 18,839 dwellings which is equivalent to a shortfall of 2,059 dwellings over this period'.

In addition to this, Taylor Wimpey UK Ltd would strongly advise that the Council must over allocate housing sites to take account of inevitable slippage/non-delivery. As such, there should be a flexibility buffer addition to the total plan requirement of at least 20,898 (up to 2033) of at least 20% in line with the Local Plans Expert Group report recommendations. This will assist in ensuring that the plan is sound as it will be positively prepared and effective.

To address the deficiencies in the 5 year housing supply and also to ensure there is sufficient supply across the Plan period the Council must release further land from the Green Belt and identify significantly more housing allocations on suitable, available and achievable sites.

Under-delivery

TW object to the Council's current approach as outlined in Table 5.23 to spread under-delivery since 2012 back over the Plan period. Such an approach is not consistent with NPPF.

TW urge the Council to amend their approach and ensure that the under-delivery which has already occurred since 2012 must be made up within the first 5 years of the plan period. This is essential to ensure compliance with paragraph 035 of PPG (Planning Practice Guidance) and needs to be factored in when calculating the rolling 5 year housing land supply. This should be made clear in Policy H1 or its supporting text to be considered sound.

Boosting Supply/Early Plan Review

In view of the Council's historic delivery issues, TW would suggest the inclusion of a mechanism to boost housing supply if it falls below planned supply at any point during the plan period. Such an approach would be sound and accord with NPPF. Given that York is constrained so heavily by the Green Belt this approach must involve the identification of safeguarded land as set out in TW's representations to Policy SS2 (The Role of York's Green Belt).

In addition, the plan should also include triggers for a full plan review if the plan fails to deliver against the housing requirement for a specified period of time. Such an approach would accord with emerging NPPF.

Additional Sites - Land at Galtres Farm

To assist in meeting the Council's significant shortfall in housing allocations, Taylor Wimpey UK Ltd seek the release of the Land at Galtres Farm (see Figure 1) from the Green Belt and its allocation for residential development within the emerging Local Plan. A copy of the plan at Figure 1 is also appended to these representations.

The site has been promoted previously and was considered in the 2017 SHLAA (sites 891 & 922) alongside land to the north and east but was not taken forward as a housing allocation in the Publication Draft Local Plan.

A report was taken to the Local Plan Working Group on 23rd January 2018 to provide an outline on taking the Local Plan forward to Publication Draft stage (Regulation 19). Paragraph 27 of the report advises, *'in Officer's opinion, an increase in the supply of housing would place the Council in a better position for defending the Plan proposals through the Examination process'*.



Figure 1: Site Location Plan

Table 3 of the report provides details of potential new housing site allocations and includes sites that have in the past been assessed against the site selection criteria and rejected, but now given further work Officers feel should be considered. Site 964 'Galtres Farm' is identified as one such site in Table 3. It is therefore clear the Officers consider this an appropriate location for further housing development.

A report was taken to the Local Plan Working Group on 23rd January 2018 to provide an outline on taking the Local Plan forward to Publication Draft stage (Regulation 19). Paragraph 27 of the report advises, *'in Officer's opinion, an increase in the supply of housing would place the Council in a better position for defending the Plan proposals through the Examination process'*.

Table 3 of the report provides details of potential new housing site allocations and includes sites that have in the past been assessed against the site selection criteria and rejected, but now given further work Officers feel should be considered. Site 964 'Galtres Farm' is identified as one such site in Table 3. It is therefore clear the Officers consider this an appropriate location for further housing development.

The boundaries of the 'Galtres Garden Village' should be refined to include the remainder of the land at Galtres Farm as shown on Figure 1 which extends to approximately 27 hectares and could accommodate a significant amount of new homes as well as providing significant open space and increasing the size and usability of the proposed country park to the north. This would be beneficial for the following reasons:

- A larger the Garden Village the more shops, services and bus services that it will be able to support in turn enhancing its sustainability credentials against other alternatives;
- It would enable access from the A1237. It is noted that there are concerns over the width of North Lane and its suitability to serve the Galtres Garden Village;
- It would make a significant contribution to addressing the shortfall in housing supply over the Plan period including in the first 5 years identified above; and
- Taylor Wimpey UK Ltd are a national housebuilder with a track record of delivering housing and would bring forward much needed development early in the Plan period.

The Land at Galtres Farm (as shown on Figure 1) represents a suitable, sustainable location for residential development, with no physical or environmental constraints that would fundamentally prevent its viable development. Furthermore, the site is available now and could come forward in the short term to deliver a range of much needed market and affordable housing.

There are no ownership constraints to development; the landowner is willing to dispose of the land for residential purposes; the site is available now.

Taylor Wimpey are willing developers with a proven track record of delivering housing that can meet the identified needs of the City.

For the reasons outlined above, TW would request that the Land at Galtres Farm (Figure 1) be released from the Green Belt and allocated for residential development on the basis it represents an appropriate opportunity for significant housing development, which is capable of making a positive contribution towards the housing development required in the City over the plan period.

Moreover, the boundaries of any wider allocation in this location should be refined to include the remaining land at Galtres Farm as show on Figure 1.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Taylor Wimpey UK Ltd propose the following changes to the policy to make it sound:

- Release the land at Galtres Farm shown in Figure 1 from the Green Belt and allocate it for residential development.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

TW have fundamental objections to Policy H1 as set out above on matters which need to be addressed as part of a Hearing session.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature

S Longstaff

Date

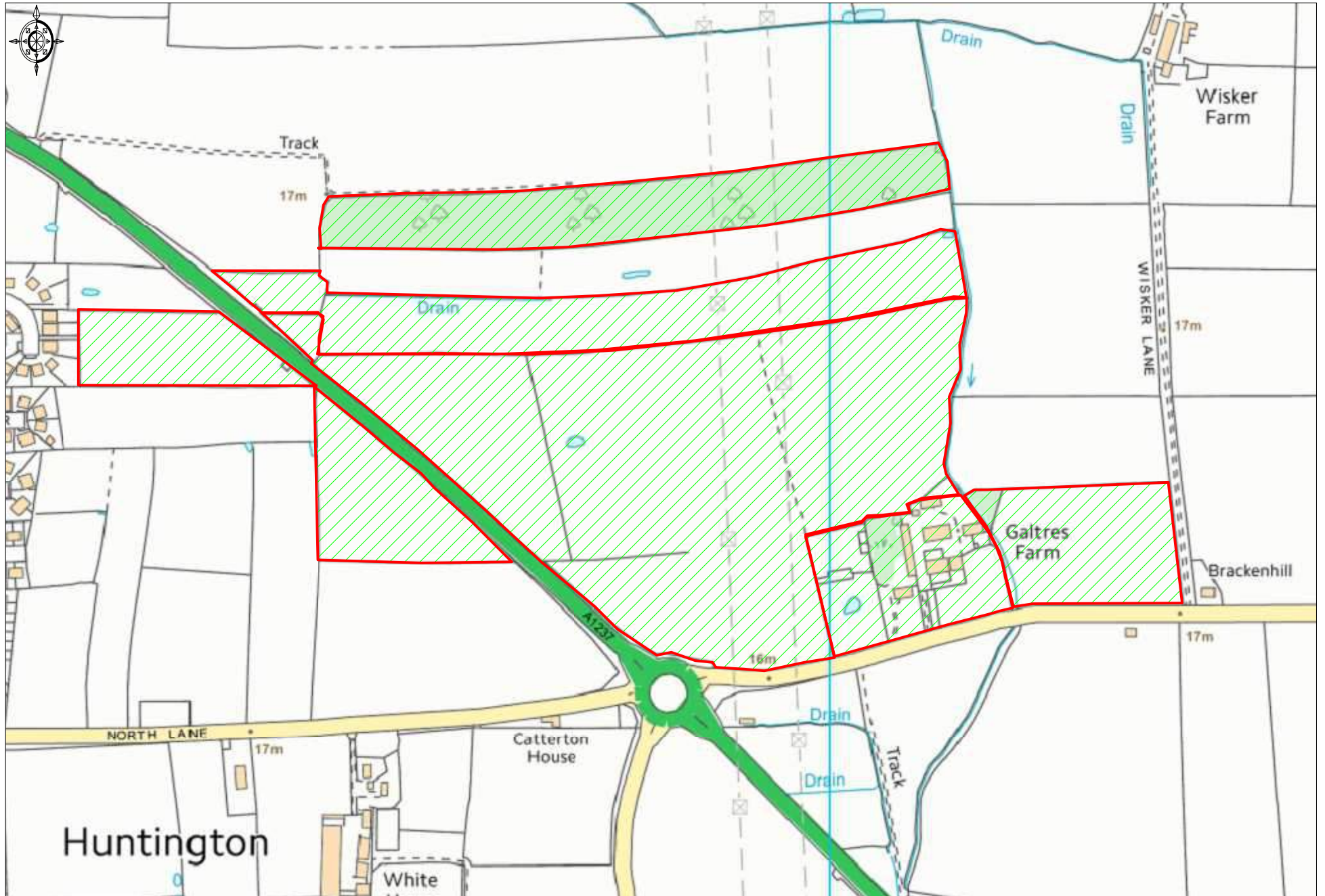
04/04/2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

Redline Plan - Galtres Farm North Land, Huntington, York,
Scale @ 1:5,000 - Gross Acres: 67.81



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City of York Local Plan Publication Draft

Technical Report on Housing Issues

Linden Homes, Taylor Wimpey UK Ltd, Persimmon Homes, Strata Homes Ltd and Bellway Homes

March 2018

LICHFIELDS

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1.0 Introduction

- 1.1 Lichfields has been commissioned by Linden Homes, Taylor Wimpey UK Ltd, Persimmon Homes, Strata Homes Ltd & Bellway Homes [the Companies] to undertake a review of City of York Council's housing requirement and housing supply that has formed a key part of the evidence base to inform the City of York Local Plan Publication [LPP] Draft Consultation (March 2018).
- 1.2 Specifically, this report updates our September 2017 Technical Report on Housing Issues and provides a critique of the Objective Assessment of Housing Needs [OAHN] set out in the City of York Strategic Housing Market Assessment [SHMA] Assessment Update (September 2017, prepared by GL Hearn) following previous representations on behalf of the Companies on the 2016 SHMA and 2016 SHMA Addendum.
- 1.3 It also provides high level comments on the Council's housing land supply based on the evidence set out in the following documents:
- 1 The City of York Strategic Housing Land Availability Assessment [SHLAA] (September 2017);
 - 2 The City of York Local Plan Publication Draft (March 2018);
 - 3 Half Year Housing Monitoring Update for Monitoring Year 2017/18 (1st April 2017 to 30th September 2017); and,
 - 4 The City of York Windfall Allowance Technical Paper 2017 (SHLAA Annex 5).
- 1.4 Lichfields considers that on the basis of the contents of this report, the City of York Council is not providing sufficient land to meet the housing needs of the City and further sites should be allocated for housing development as part of the emerging Local Plan.
- 1.5 The remainder of this report is set out as follows:
- 1 **Section 2.0** - This section considers the approach which needs to be taken to calculating Objectively Assessed Housing Need [OAHN] and sets out the requirements of the Framework, the Practice Guidance and relevant High Court judgments in this context;
 - 2 **Section 3.0** – This section provides an overview of the findings of the 2016 SHMA and 2016 SHMA addendum, a summary of Lichfields response to these documents, and an overview of the findings of the September 2017 SHMA Assessment Update;
 - 3 **Section 4.0** - Provides a critique of the September 2017 SHMA Assessment Update. This Section sets out the extent to which the document fulfils the necessary requirements previously discussed and whether it represents the full, objectively assessed housing need for the City of York. **Appendix 1** sets out Lichfields' assessment of Market Signals in the City of York;
 - 4 **Section 5.0** - Considers the approach which needs to be taken to assessing housing land supply and sets out the requirements of the Framework, the Practice Guidance and relevant High Court judgments in this context;
 - 5 **Section 6.0** – Provides an overview of the Council's housing supply evidence;
 - 6 **Section 7.0** – Identifies the relevant housing requirement figures to be used for both the 5-year assessment and the plan period assessment;
 - 7 **Section 8.0** - Assesses the adequacy of the deliverable and developable supply of housing sites to meet the requirement for the plan period and 5-year period. It draws on the information supplied by the Council in the LPP and associated evidence base;
 - 8 **Section 9.0** - Assesses the housing supply against the OAHNs for York identified by the Council and by Lichfields; and,

- 9 **Section 10.0** Summarises the key issues within the Councils evidence base and sets out why it is not compliant with the requirements for an OAHN calculation and housing land supply.

2.0 Approach to Identifying OAHN

Introduction

- 2.1 This section sets out the requirements of the Framework and the Practice Guidance in objectively assessing housing needs. This will provide the benchmark against which the SHMA Assessment Update will be reviewed, to ensure the necessary requirements are met. In addition, relevant High Court judgments have been referenced to set out the requirements of an OAHN calculation in a legal context.

Policy Context

National Planning Policy Framework

- 2.2 The Framework outlines a two-step approach to setting housing requirements in Local Plans. Firstly, to define the full objectively assessed need for development and then secondly, to set this against any adverse impacts or constraints which would mean that need might not be met. This is enshrined in the approach defined in the Framework which sets out the presumption in favour of sustainable development:

“For plan-making this means that:

- *LPAs should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted.”¹*

- 2.3 The Framework goes on to set out that in order to 'boost significantly' the supply of housing, LPAs should:

“use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the framework...”²

- 2.4 The Framework sets out the approach to defining such evidence which is required to underpin a local housing requirement. It sets out that in evidencing housing needs:

“LPAs should have a clear understanding of housing needs in their area. They should:

- *prepare a SHMA to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*
 - *meets household and population projections, taking account of migration and demographic change;*

¹ Framework - §14

² Framework - §47

- *addresses the need for all types of housing, including affordable housing and the needs of different groups in the community...; and*
- *caters for housing demand and the scale of housing supply necessary to meet this demand... ”³*

2.5 Furthermore, the core planning principles set out in the Framework⁴ indicate that a planned level of housing to meet objectively assessed needs must respond positively to wider opportunities for growth and should take account of market signals, including housing affordability.

Draft National Planning Policy Framework

2.6 The Framework draft text for consultation was published in March 2018. It has an unequivocal emphasis on housing, with the introduction to the consultation proposals clarifying that the country needs radical, lasting reform that will allow more homes to be built, with the intention of reaching 300,000 net additional homes a year. The draft states that to support the Government’s objective of ‘significantly boosting the supply of homes’, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay [§60].

2.7 In particular:

“In determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method in national planning guidance – unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals. In establishing this figure, any needs that cannot be met within neighbouring areas should also be taken into account”. [§61]

2.8 The draft also makes it clear that when identifying the housing need, policies should also break the need down by size, type and tenure of homes required for different groups in the community (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes) [§62].

2.9 Paragraphs 68 - 78 also set out how Councils should identify and maintain a five years’ worth of housing against their housing requirement.

2.10 In terms of the weight that can be attached to this draft document, it is accepted that only limited weight can be attached to the document at present as it is still out for consultation. In this regard, paragraph 209 to Annex 1 of the draft Framework states that the policies in the previous Framework will apply for the purposes of examining plans, where those plans are submitted on or before the date which is 6 months after the final Framework’s publication. *“in these cases the examination will take no account of the new Framework”*.

2.11 However the draft Framework remains a useful indicator of the direction of travel, not least with the approach to be taken to defining housing need, which has already been the subject of an earlier consultation (*‘Planning for the right homes in the right places’*, September 2017), to which MHCLG published a summary of consultation responses and its view on the way forward in March 2018.

³ Framework - §159

⁴ Framework - §17

National Planning Practice Guidance

- 2.12 The Framework is supplemented by the Practice Guidance which provides an overarching framework for considering housing needs, but also acknowledges that:

“There is no one methodological approach or use of a particular dataset(s) that will provide a definitive assessment of development need”⁵.

- 2.13 The Guidance states that household projections published by CLG should provide the starting point estimate of overall housing need⁶.

- 2.14 Although the Practice Guidance notes that demographic trends should be applied as a starting point when assessing the OAHN, it goes on to state that consideration should also be given to the likely change in job numbers. This supports the importance that the Framework⁷ places on the economy and the requirement to *“ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”*. A failure to take account of economic considerations in the determination of the OAHN would be inconsistent with this policy emphasis.

- 2.15 The Inspector at the Fairford Inquiry⁸ recognised the role of economic factors in the assessment of the OAHN for Cotswold District:

“The Council has not provided a figure for OAN which takes account of employment trends. The Council argues that the advice in the PPG does not require local planning authorities to increase their figure for OAN to reflect employment considerations, but only to consider how the location of new housing or infrastructure development could help address the problems arising from such considerations. I disagree. In my view, the PPG requires employment trends to be reflected in the OAN, as they are likely to affect the need for housing. They are not “policy on” considerations but part of the elements that go towards reaching a “policy off” OAN, before the application of policy considerations. There is no evidence that the Council’s figures reflect employment considerations” [IR. §19].

- 2.16 This view reflects the position expressed by the Inspector (and confirmed by the Secretary of State) in the Pulley Lane Inquiries in Droitwich Spa⁹. The Inspector’s report (which was accepted by the SoS) states that:

“The Council’s case that “unvarnished” means arriving at a figure which doesn’t take into account migration or economic considerations is neither consistent with the (Gallagher) judgment, nor is it consistent with planning practice for deriving a figure for objectively assessed need to which constraint policies are then applied. Plainly the Council’s approach is incorrect. Clearly, where the judgement refers to ‘unvarnished’ figures (paragraph 29) it means environmental or other policy constraints. There is nothing in the judgement which suggests that it is not perfectly proper to take into account migration, economic considerations, second homes and vacancies”. [IR. §8.45]

- 2.17 Housing need, as suggested by household projections, should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Relevant signals may include land prices, house prices, rents, affordability (the ratio between lower quartile house prices and the lower quartile income or earnings can be

⁵ Practice Guidance – ID:2a-005-20140306

⁶ Practice Guidance – ID:2a-015-20140306

⁷ Framework - §158

⁸ Land South of Cirencester Road, Fairford (PINS Ref No: APP/F1610/A/14/2213318) (22 September 2014).

⁹ Land at Pulley Lane, Newland Road and Primsland Way, Droitwich Spa (APP/H1840/A/13/2199085) and Land north of Pulley Lane, Newland Road and Primsland Way, Droitwich Spa (PINS Ref No: APP/H1840/A/13/2199426) (2 July 2014).

used to assess the relative affordability of housing), rate of development and, overcrowding¹⁰:

“Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.”¹¹

- 2.18 In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable. The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be¹².
- 2.19 The Guidance recognises that market signals are affected by a number of economic factors, and plan makers should not attempt to estimate the precise impact of an increase in housing supply. Rather they should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability, and monitor the response of the market over the plan period¹³.
- 2.20 The Practice Guidance concludes by suggesting that the total need for affordable housing should be identified and converted into annual flows by calculating the total net need (subtracting total available stock from total gross need) and converting total net need into an annual flow.
- 2.21 The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments:

“An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.”¹⁴

Draft Planning Practice Guidance

- 2.22 Following on from the draft Framework, on 9th March 2018 MHCLG published its draft Planning Practice Guidance for consultation. This provides further detail on 6 main topic areas: viability; housing delivery; local housing need assessments; Neighbourhood Plans; Plan-making and Build-to-rent.
- 2.23 Regarding housing delivery, the draft Practice Guidance sets out how local authorities should identify and maintain a 5-year supply of specific deliverable sites, bringing the Guidance into line with recent Ministerial statements and High Court Judgements. In particular, it clarifies that along with older peoples’ housing, all student accommodation can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market.
- 2.24 Furthermore, LPAs should deal with deficits or shortfalls against planned requirements within the first 5 years of the plan period (i.e. the ‘Sedgefield’ approach to backlog).
- 2.25 In terms of the Local Housing Need Assessment, this takes forward the approach set out in CLG’s September 2017 consultation on *“Planning for the right homes in the Right Places”*. The proposed approach to a standard method for calculating local housing need, including transitional arrangements, is set out and as before, consists of three components. The starting point would continue to be a demographic baseline using the latest CLG household projections

¹⁰ Practice Guidance – ID:2a-019-20140306

¹¹ Practice Guidance – ID:2a-020-20140306

¹² Practice Guidance – ID:2a-020-20140306

¹³ *ibid*

¹⁴ Practice Guidance – ID: 2a-029-20140306

(over a 10-year time horizon), which is then modified to account for market signals (the median price of homes set against median workplace earnings). The modelling proposes that each 1% increase in the ratio of house prices to earnings above 4 results in a ¼% increase in need above projected household growth.

2.26 The uplift is then capped to limit any increase an authority may face when they review their plan:

- a *“for those authorities that have reviewed their plan (including a review of local housing need) or adopted their plan in the last five years, a cap may be applied to their new annual local housing need figure at 40 per cent above the average annual requirement figure currently set out in their plan; or*
- b *for those authorities that have not reviewed their plan (including a review of local housing need) or adopted their plan in the last five years, a cap may be applied to their new annual local housing need figure at 40% above whichever is higher of the projected household growth for their area over the 10 years (using Office for National Statistics’ household projections), or the annual housing requirement figure set out in their most recent plan if one exists.” [page 25]*

2.27 The various stages are set out in Figure 2.1.

Figure 2.1 Proposed methodology for determination of OAHN



Source: Lichfields

2.28 In terms of the ability of LPAs to deviate from this proposed new methodology, this is discouraged unless there are compelling circumstances not to adopt the approach. For example:

“There may be circumstances where it is justifiable to identify need above the need figure identified by the standard method. The need figure generated by the standard method should be considered as the minimum starting point in establishing a need figure for the purposes of plan production. The method relies on past growth trends and therefore does not include specific uplift to account for factors that could affect those trends in the future. Where it is likely that additional growth (above historic trends identified by household

projections) will occur over the plan period, an appropriate uplift may be applied to produce a higher need figure that reflects that anticipated growth. Circumstances where an uplift will be appropriate include, but are not limited to; where growth strategies are in place, strategic level infrastructure improvements are planned, funding is in place to promote and facilitate growth (i.e. Housing Deals, Housing Infrastructure Fund). In these circumstances, the local housing need figure can be reflected as a range, with the lower end of the range being as a minimum the figure calculated using the standard method. Where an alternative approach identifies a need above the local housing need assessment method, the approach will be considered sound, unless there are compelling reasons to indicate otherwise.” [page 26]

2.29 As to whether LPAs can identify a lower level of need, as York City Council is suggesting:

“Plan-making authorities should use the standard method for assessing local housing need unless there are exceptional circumstances to justify an alternative approach. Any deviation which results in a lower housing need figure than the standard approach will be subject to the tests of soundness and will be tested thoroughly by the Planning Inspectorate at examination. The plan-making authority will need to make sure that the evidence base is robust and based on realistic assumptions, and that they have clearly set out how they have demonstrated joint working with other plan-making authorities. In such circumstances, the Planning Inspector will take the number from the standard method as a reference point in considering the alternative method.” page 26]

2.30 Lichfields notes the following with regard to the weight to be can be attached to MHCLG’s proposed new method:

- 1 **Status of the document:** MHCLG’s document is currently out for consultation, has yet to be finalised and may be subject to significant numbers of objections from interested parties;
- 2 **Proposed Transitional Arrangements:** As noted in the draft Framework above, the policies in the previous Framework will apply for the purposes of examining plans, where those plans are submitted on or before the date which is 6 months after the final Framework’s publication.

Recent Legal Judgements

2.31 There have been several key recent legal judgments of relevance to the identification of OAHN, and which provide clarity on interpreting the Framework:

- 1 ‘St Albans City and District Council v (1) Hunston Properties Limited and (2) Secretary of State for Communities and Local Government [2013] EWCA Civ 1610’ referred to as “Hunston”;
- 2 ‘(1) Gallagher Homes Limited and (2) Lioncourt Homes Limited v Solihull Metropolitan Borough Council [2014] EWHC 1283’ referred to as “Solihull”;
- 3 ‘Satnam Millennium Limited and Warrington Borough Council [2015] EWHC 370’ referred to as “Satnam”; and,
- 4 ‘Kings Lynn and West Norfolk Borough Council v (i) Secretary of State for Communities and Local Government and (ii) Elm Park Holdings [2015] EWHC 1958’ referred to as “Kings Lynn”.

Hunston

- 2.32 “Hunston” [EWCA Civ 1610] goes to the heart of the interpretation of the Framework¹⁵. It relates to an appeal decision in respect of a scheme predominantly comprising housing on a Green Belt site. Its relevance is that it deals with the question of what forms the relevant benchmark for the housing requirement, when policies on the housing requirement are absent, silent or out of date as referred to in the Framework¹⁶.
- 2.33 Hunston establishes that §47 applies to decision-taking as well as plan-making and that where policies for the supply of housing are out of date, objectively assessed needs become the relevant benchmark.
- 2.34 Sir David Keene in his judgment at §25 stated:
- “... I am not persuaded that the inspector was entitled to use a housing requirement figure derived from a revoked plan, even as a proxy for what the local plan process may produce eventually. The words in paragraph 47(1), “as far as is consistent with the policies set out in this Framework” remind one that the Framework is to be read as a whole, but their specific role in that sub-paragraph seems to me to be related to the approach to be adopted in producing the Local Plan. If one looks at what is said in that sub-paragraph, it is advising local planning authorities:*
- “...to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework.”*
- “That qualification contained in the last clause quoted is not qualifying housing needs. It is qualifying the extent to which the Local Plan should go to meet those needs. The needs assessment, objectively arrived at, is not affected in advance of the production of the Local Plan, which will then set the requirement figure.”*
- 2.35 Crucially Hunston determined that it is clear that constraints should not be applied in arriving at an objective assessment of need. Sir David Keene in Hunston goes on to set out that [§§26-27]:
- “... it is not for an inspector on a Section 78 appeal to seek to carry out some sort of local plan process as part of determining the appeal, so as to arrive at a constrained housing requirement figure. An inspector in that situation is not in a position to carry out such an exercise in a proper fashion, since it is impossible for any rounded assessment similar to the local plan process to be done... It seems to me to have been mistaken to use a figure for housing requirements below the full objectively assessed needs figure until such time as the Local Plan process came up with a constrained figure.”*
- “It follows from this that I agree with the judge below that the inspector erred by adopting such a constrained figure for housing need. It led her to find that there was no shortfall in housing land supply in the district. She should have concluded, using the correct policy approach, that there was such a shortfall. The supply fell below the objectively assessed five year requirement.”*

Solihull

- 2.36 “Solihull” [EWHC 1283] is concerned with the adoption of the Solihull Local Plan and the extent to which it was supported by a figure for objectively assessed housing need. Although related to

¹⁵ Framework - §47

¹⁶ Framework - §14

plan-making, it again deals with the Framework¹⁷ and draws upon, and reiterates, the earlier Hunston judgment.

2.37 The judgment of Hickinbottom J in Solihull sets out a very useful summary of the staged approach to arriving at a housing requirement, providing some useful definitions of the concepts applied in respect of housing needs and requirements [§37]:

*“i) **Household projections:** These are demographic, trend-based projections indicating the likely number and type of future households if the underlying trends and demographic assumptions are realised. They provide useful long-term trajectories, in terms of growth averages throughout the projection period. However, they are not reliable as household growth estimates for particular years: they are subject to the uncertainties inherent in demographic behaviour, and sensitive to factors (such as changing economic and social circumstances) that may affect that behaviour...”*

*“ii) **Full Objective Assessment of Need for Housing:** This is the objectively assessed need for housing in an area, leaving aside policy considerations. It is therefore closely linked to the relevant household projection; but is not necessarily the same. An objective assessment of housing need may result in a different figure from that based on purely demographics if, e.g., the assessor considers that the household projection fails properly to take into account the effects of a major downturn (or upturn) in the economy that will affect future housing needs in an area. Nevertheless, where there are no such factors, objective assessment of need may be – and sometimes is – taken as being the same as the relevant household projection.”*

*“iii) **Housing Requirement:** This is the figure which reflects, not only the assessed need for housing, but also any policy considerations that might require that figure to be manipulated to determine the actual housing target for an area. For example, built development in an area might be constrained by the extent of land which is the subject of policy protection, such as Green Belt or Areas of Outstanding Natural Beauty. Or it might be decided, as a matter of policy, to encourage or discourage particular migration reflected in demographic trends. Once these policy considerations have been applied to the figure for full objectively assessed need for housing in an area, the result is a “policy on” figure for housing requirement. Subject to it being determined by a proper process, the housing requirement figure will be the target against which housing supply will normally be measured.”*

2.38 Whilst this is clear that a housing requirement is a “policy on” figure and that it may be different from the full objectively assessed need, Solihull does reiterate the principles set out in Hunston, namely that where a Local Plan is out of date in respect of a housing requirement (in that there is no Framework-compliant policy for housing provision within the Development Plan) then the housing requirement for decision taking will be an objective assessment of need [§88]:

“I respectfully agree with Sir David Keene (at [4] of Hunston): the drafting of paragraph 47 is less than clear to me, and the interpretative task is therefore far from easy. However, a number of points are now, following Hunston, clear. Two relate to development control decision-taking.

i) “Although the first bullet point of paragraph 47 directly concerns plan-making, it is implicit that a local planning authority must ensure that it meets the full, objectively assessed needs for market and affordable housing in the housing market, as far as consistent with the policies set out in the NPPF, even when considering development

¹⁷ Framework - §14 & §47

control decisions.”

- ii) *“Where there is no Local Plan, then the housing requirement for a local authority for the purposes of paragraph 47 is the full, objectively assessed need.”*

2.39 Solihull also reaffirms the judgment in Hunston that full objectively assessed needs should be arrived at, and utilised, without the application of any constraining factors. At §91 of the judgment the judge sets out:

“... in the context of the first bullet point in paragraph 47, policy matters and other constraining factors qualify, not the full objectively assessed housing needs, but rather the extent to which the authority should meet those needs on the basis of other NPPF policies that may, significantly and demonstrably outweigh the benefits of such housing provision.”

Satnam

2.40 “Satnam” [EWHC 370] highlights the importance of considering affordable housing needs in concluding on full OAHN. The decision found that the adopted OAHN figure within Warrington’s Local Plan was not in compliance with policy in respect of affordable housing because (as set out in §43) the assessed need for affordable housing need was never expressed or included as part of OAHN.

2.41 The decision found that the “*proper exercise*” had not been undertaken, namely:

- “(a) having identified the OAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes;”*
- “(b) the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in NPPF, paragraphs 14 and 47.”*

2.42 In summary, this judgment establishes that full OAHN has to include an assessment of full affordable housing needs.

Kings Lynn

2.43 Whilst “Satnam” establishes the fact that full OAHN must include affordable housing needs, “Kings Lynn” [EWHC 1958] establishes how full affordable housing needs should be addressed as part of a full OAHN calculation. The judgment identifies that it is the function of a SHMA to address the needs for all types of housing including affordable, but not necessarily to meet these needs in full. The justification of this statement is set out below in §35 to §36 of the judgment.

“At the second stage described by the second sub-bullet point in paragraph 159, the needs for types and tenures of housing should be addressed. That includes the assessment of the need for affordable housing as well as different forms of housing required to meet the needs of all parts of the community. Again, the PPG provides guidance as to how this stage of the assessment should be conducted, including in some detail how the gross unmet need for affordable housing should be calculated. The Framework makes clear these needs should be addressed in determining the FOAN, but neither the Framework nor the PPG suggest that they have to be met in full when determining that FOAN. This is no doubt because in practice very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice. That is because the vast majority of delivery will occur as a proportion of open-market schemes and is therefore dependent for its delivery upon market housing being

developed. It is no doubt for this reason that the PPG observes at paragraph ID 2a-208-20140306 as follows:

"i The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes."

"This consideration of an increase to help deliver the required number of affordable homes, rather than an instruction that the requirement be met in total, is consistent with the policy in paragraph 159 of the Framework requiring that the SHMA "addresses" these needs in determining the FOAN. They should have an important influence increasing the derived FOAN since they are significant factors in providing for housing needs within an area."

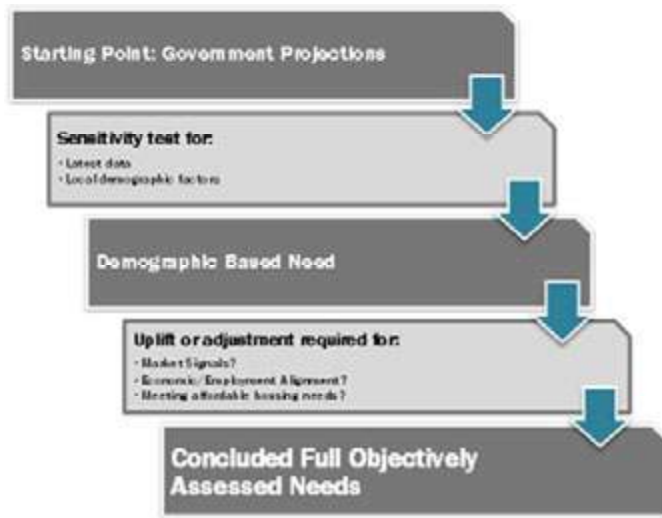
- 2.44 The judgment is clear that the correct method for considering the amount of housing required to meet full affordable housing needs is to consider the quantum of market housing needed to deliver full affordable housing needs (at a given percentage). However, as the judgment sets out, this can lead to a full OAHN figure which is so large that a LPA would have *"little or no prospect of delivering [it] in practice"*. Therefore, it is clear from this judgment that although it may not be reasonable and therefore should not be expected that the OAHN will include affordable housing needs in full, an uplift or similar consideration of how affordable needs can be 'addressed' is necessary as part of the full OAHN calculation. This reflects the Framework¹⁸.

Conclusion

- 2.45 It is against this policy context that the housing need for the City of York must be considered. In practice, applying the Framework and Practice Guidance to arrive at a robust and evidenced OAHN is a staged and logical process. An OAHN must be a level of housing delivery which meets the needs associated with population, employment and household growth, addresses the need for all types of housing including affordable and caters for housing demand.
- 2.46 Furthermore, a planned level of housing to meet OAHN must respond positively to wider opportunities for growth and should take account of market signals, including affordability. This approach has been supported by the recent Legal Judgements summarised above. This approach is summarised in Figure 2.2.

¹⁸ Framework - §158

Figure 2.2 The Framework and Practice Guidance Approach to Objectively Assessing Housing Needs



Source: Lichfields based upon the Framework / Practice Guidance

3.0 City of York Council's OAHN Evidence

Introduction

- 3.1 Before setting out a critique of CYC's housing OAHN evidence base, it is important to recognise that the Council has never had an adopted Local Plan for the City (under the 1971 Act, the 1990 Act or the 2004 Act) and progress on the current draft Local Plan has been, it is not unfair to say, glacial.
- 3.2 The development plan for York comprises two policies¹⁹ and the Key Diagram of the partially revoked Yorkshire and Humber Regional Strategy (2008) [YHRS]. There is no adopted Local Plan for York that forms part of the development plan. Instead, there is a long history of failed attempts to produce an adopted Local Plan.
- 3.3 The Council published the '*York Local Plan - Preferred Options*' document for consultation in summer 2013, followed by a 'Further Sites' consultation for six weeks in summer 2014 which included potential new sites and changes to the boundaries of some of the sites originally identified. Following these consultations, a '*Publication Draft Local Plan and Proposals Map*' was considered by the Local Plan Working Group [LPWG] and by Cabinet in September 2014²⁰. With the intention of progressing a Framework compliant Local Plan, the Cabinet resolved to carry through the LPWG's recommendations and approve the Local Plan Publication Draft for public consultation, subject to amendments circulated at the Cabinet meeting and to instruct officers to report back following the consultation with a recommendation on whether it would be appropriate to submit the Publication Draft for public examination.
- 3.4 However, at the Full Council on 9 October 2014²¹ a resolution was made to halt the public consultation on the Local Plan Publication Draft in order to reassess and accurately reflect objectively assessed housing requirements. The resolution also instructed officers to produce a report on the housing trajectory to be brought back to the next meeting of the LPWG in November 2014 along with the relevant background reports. The intention was for the report to allow the LPWG to agree an accurate analysis of the housing trajectory that is objective, evidence based and deliverable. The analysis was to be used to "*inform housing allocations and a new proposed Local Plan to be brought back to the next LPWG for discussion and recommendation to Cabinet in November.*"
- 3.5 The Council published the following 'further work' on the Local Plan relating to housing needs since the Full Council resolution to halt the Publication Draft Local Plan in 2014:
- 1 In December 2014, the LPWG considered a report on '*Housing Requirements in York*' which was based on two background documents produced by Arup²². The report set out four different housing requirement figures that were considered sound against the evidence base and three options for progressing the work on housing requirements. The LPWG members agreed a housing requirement figure of 926dpa²³;
 - 2 In September 2015 the LPWG considered an update on the '*Objective Assessment of Housing Need*' [OAHN] report produced by Arup²⁴ and a report on '*Economic Growth*'²⁵. The Arup report concluded that the housing 'requirement' should be in the range of 817

¹⁹ Both relating to Green Belt, requiring its inner boundaries to be defined in a plan and confirming that the general extent is about 6 miles out from the City centre

²⁰ Cabinet Meeting Thursday 25 September, 2014 - Minutes

²¹ Resolutions and proceedings of the Meeting of the City of York Council held in Guildhall, York on Thursday, 9th October, 2014

²² Assessment of the Evidence on Housing Requirements in York (Arup, May 2013) & Housing Requirements in York: Evidence on Housing Requirements in York: 2014 Update (Arup, September 2014)

²³ Local Plan Working Group 17 December 2014 - Minutes

²⁴ Evidence on Housing Requirements in York: 2015 Update – Arup (August 2015)

²⁵ York Economic Forecasts – Oxford Economics (May 2015)

dwellings per annum [dpa] to 854dpa between 2012 and 2031. The LPWG's recommendations were that the Executive Committee note the Arup OAHN report and endorse further work, including an evaluation of any spatial and delivery implications, on two scenarios for economic growth that would be reported back to the LPWG in due course;

- 3 In Autumn 2015 the Council commissioned GL Hearn jointly with Ryedale, Hambleton and the North York Moors National Park Authority to undertake a Strategic Housing Market assessment [SHMA]²⁶. This study aimed to provide a clear understanding of housing needs in the City of York area. The SHMA was published as part of a suite of documents for the LPWG meeting on 27th June 2016. It concluded that the OAHN for the City of York was in the order of 841dpa.
- 4 On the 25th May 2016 ONS published a new set of (2014-based) sub national population projections [SNPP]. These projections were published too late in the SHMA process to be incorporated into the main document. However in June 2016 GL Hearn produced an Addendum²⁷ to the main SHMA report which briefly reviewed key aspects of the projections and concluded that the latest (higher) SNPP suggested a need for some 898dpa between 2012 and 2032. However due to concerns over the historic growth within the student population, the Addendum settled on a wider OAHN range of 706dpa - 898dpa, and therefore the Council considered that it did not need to move away from the previous 841dpa figure.
- 5 DCLG published updated 2014-based sub-national household projections [SNHP] in July 2016. GL Hearn was asked by City of York Council to update the SHMA to take account of these new figures and to assess the representations received through the Preferred Sites Consultation [PSC] relating to OAN. The GL Hearn SHMA Addendum Update (May 2017) subsequently updated the demographic starting point for York based on these latest household projections. The 2014-based SNHP increases the demographic starting point from 783dpa (in the 2016 SHMA) to 867dpa. In their Update, GL Hearn then applied a 10% uplift to the 867dpa starting point to account for market signals and affordable housing need and identifies a resultant housing need of 953dpa. However, a cover sheet to GL Hearn's Update, entitled 'Introduction and Context to objective Assessment of Housing Need' was inserted at the front of this document by the Council. This states that 867dpa is the relevant baseline demographic figure for the 15 year period of the plan (2032/33). The Council rejected the 953dpa figure on the basis that GL Hearn's conclusions stating:

"...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."

- 3.6 As a result of this approach, the February 2018 City of York Publication Draft now states in Policy SS1: Delivering Sustainable Growth for York, the intention to:

"Deliver a minimum annual provision of 867 new dwellings over the plan period to 2032/33 and post plan period to 2037/38."

- 3.7 The supporting text to this policy makes no mention of the 953 dpa OAHN figure, but instead claims that 867 dpa is "*an objectively assessed housing need*" [§3.3].

- 3.8 The remainder of this section provides an overview of the findings of the 2016 SHMA and 2016 SHMA addendum, a summary of Lichfields response to these documents, and an overview of the findings of the September 2017 SHMA Assessment Update.

²⁶GL Hearn (June 2016): City of York Council Strategic Housing Market Assessment

²⁷GL Hearn (June 2016): City of York Council Strategic Housing Market Assessment - Addendum

Overview of the City of York SHMA

- 3.9 The emerging City of York Local Plan is currently underpinned by three key housing need documents:
- 1 City of York Strategic Housing Market Assessment [SHMA], prepared on behalf of CYC by GL Hearn in June 2016;
 - 2 City of York SHMA Addendum, prepared on behalf of CYC by GL Hearn in June 2016; and,
 - 3 City of York September 2017 SHMA Assessment Update prepared on behalf of CYC by GL Hearn.
- 3.10 These documents follow on from previous reports prepared to inform the emerging Local Plan including the *'City of York Council Housing Requirements in York Evidence on Housing Requirements in York: 2015 Update'* (August 2015) prepared by Arup and the *'North Yorkshire Strategic Housing Market Assessment'* (November 2011) prepared by GVA.
- 3.11 A review of these documents and Lichfields' previous submissions on the City of York SHMA (June 2016) and the SHMA Addendum (June 2016) has been provided below in order to provide the context to the issues raised in this Technical Report.

City of York SHMA (June 2016)

- 3.12 GL Hearn states that the SHMA was prepared *'essentially to sensitivity check'* the Arup August 2015 Housing Requirements in York report. However, it departs significantly from the Arup approach and undertakes an entirely new set of modelling using the 2012-based SNPP and 2012-based SNHP for the period 2012-2032. The subsequent Addendum was prepared to understand the implications on the earlier SHMA analysis of the publication of the 2014-based Sub-National Population Projections [SNPP] on 25th May 2016.
- 3.13 The SHMA concludes (Section 2.0) that the HMA which covers the City of York also extends to include Selby. However:
- "While we propose a HMA which links to Selby and York we are not considering housing need across the HMA. Selby has recently produced its own SHMA and this assessment does not seek to replicate it"* [§2.106]
- 3.14 GL Hearn undertook a number of demographic modelling scenarios including the 2012-based SNPP; long term migration trends and 2012-based SNPP adjusted to take into account the (higher) 2014 MYE. GL Hearn concluded that the SNPP *"is a sound demographic projection from a technical perspective"* [page 83], although they attached greater weight to a higher figure of 833 dpa based on a projection which takes into account the 2013 and 2014 Mid-Year Population Estimates [MYE] and rolls forward the SNPP.
- 3.15 The SHMA concluded that one of the most noteworthy findings from the analysis was the relatively small increase in the population aged 15-29 (which includes the vast majority of students):
- "Whilst over the 2001-2014 period this age group increased by 12,600, there is only projected to be a 2,500 increase over the 20-years to 2032. Such a finding is consistent with this age group not being expected to see any notable changes at a national level in the future...At the time of writing York University was not expecting significant increases in the student population, whilst St Johns was only expecting a modest increase. With this knowledge, and the age specific outputs from the SNPP we can have reasonable confidence that the SNPP is a realistic projection."* [§§4.31-4.32]
- 3.16 The projections are set out in Table 3.1.

Table 3.1 Summary of the City of York SHMA (June 2016) Range of Scenarios (2012-2032)

	Change in Households	Dwellings per annum (2012-2032)	Job growth per annum (2012-2032)
2012-based SNPP	15,093	783 dpa	(not provided)
2014-based	18,458	958 dpa	
UPC adjusted	12,676	658 dpa	
10-year migration	13,660	709 dpa	
2012-based SNPP (as updated)	16,056	833 dpa	
OE Baseline	15,019	780 dpa	609
OE Re-profiling			635
OE – higher migration	15,685	814 dpa	868
YHREM	15,356	797 dpa	789

Source: City of York SHMA (June 2016)

- 3.17 The analysis also considered future economic growth performance by accessing forecasts from Oxford Economics [OE] and Experian (via the Yorkshire and the Humber Regional Economic Modelling [YHREM]). The forecasts range from 609 jobs per annum (OE baseline) to 868 (OE higher migration).
- 3.18 The GL Hearn modelling concluded that this would support a level of population growth broadly in line with the 2012-based SNPP generating between 780-814dpa, which it considered to be below the level of need identified from the most recent MYE data:
- “On balance there is no justification for an uplift to housing numbers in the City to support expected growth in employment” [page 87].*
- 3.19 The SHMA proceeds to identify a relatively high level of affordable housing need, of 573dpa, above the 486dpa need identified by GVA in the 2011 SHMA. It states:
- “The analysis undertaken arguably provides some evidence to justify considering an adjustment to the assessed housing need to address the needs of concealed households, and support improvements [sic] household formation for younger households; although any adjustment will also need to take account of any future changes already within the household projections (e.g. in terms of improving household formation). The issue of a need for any uplift is considered alongside the analysis of market signals which follows.” [§6.112]*
- 3.20 However, the SHMA concludes that whilst the affordable housing need represents 69% of the need identified in the demographic-led projections, it is not appropriate to directly compare the need as they are calculated in different ways:
- “The analysis does not suggest that there is any strong evidence of a need to consider housing delivery higher than that suggested by demographic projections to help deliver more affordable homes to meet the affordable housing need.”*
- “However, in combination with the market signals evidence some additional housing might be considered appropriate to help improve access to housing for younger people. A modest uplift would not be expected to generate any significant population growth (over and above that shown by demographic projections) but would contribute to reducing*

concealed households and increasing new household formation. The additional uplift would also provide some additional affordable housing.” [page 115]

- 3.21 GL Hearn’s market signals analysis in the SHMA indicates that there are affordability pressures in the City of York:
- 1 Lower quartile to median income ratio is around 7.89 (compared to 6.45 nationally);
 - 2 House prices are also very high and tripled in the pre-recession decade. Private rental levels in York, at £675pcm, which are higher than comparator areas and nationally (£600pcm in England);
 - 3 Over-occupied dwellings increased by 52% between 2001 and 2011: “which is high relative to that seen at a regional or national level” [§8.34].
 - 4 Housing delivery in York:
“...has missed the target each year since 2007” [§8.38].
- 3.22 In this regard, GL Hearn concludes that:
- “It would therefore be appropriate to consider a modest upward adjustment to the demographic assessment of housing need to improve affordability over time.” [§8.99]*
- 3.23 To consider what level of uplift might be appropriate, GL Hearn sought to assess the degree to which household formation levels had been constrained for younger age groups, and what scale of adjustment to housing provision would be necessary for these to improve. This was derived on the assumption that household formation rates of the 25-34 age group would return to 2001 levels by 2025 (from 2015). This resulted in an increase in the annual housing provision of 8 homes per annum across the City for each of the aforementioned scenarios.
- 3.24 The SHMA confirms that this sensitivity analysis represents “*the market signals adjustment*” [§8.111], although in the light of GL Hearn’s conclusions concerning affordable housing needs (see above), this 8dpa uplift would also appear to be geared towards improving access to housing for younger people in the City.
- 3.25 The SHMA therefore concludes that applying an 8dpa uplift to the 833dpa preferred demographic scenario results in an overall housing OAHN of 841dpa over the 2012-2032 period.

SHMA Addendum (June 2016)

- 3.26 The Addendum revisits parts of the earlier City of York SHMA analysis following the publication of the 2014-based SNPP by ONS on 25th May 2016. The report found that the latest projections suggest a higher level of population growth, at levels around 28% higher than in the 2012-based SNPP.
- 3.27 GL Hearn’s analysis states that the difference between the 2014-based SNPP and the 2012-based SNPP “*is around 4,000 people, with around the same number being an additional increase in the 15-29 age group (4,200 of the difference)*” [§1.10].
- 3.28 GL Hearn considers that the growth in the younger age group is likely to reflect the strong growth in the student population in the City between 2008 and 2014 as a result of a new campus opening (the University of York expanded by 3,500 students over the period). The Update quotes an ONS response to CYC during the consultation to the latest projections, which suggests that some locally specific issues (such as the recorded outflow of male students from the city of York) may be under-estimated and should be treated with care.
- 3.29 This is in contrast to GL Hearn’s previous conclusions on the 2012-based SNPP (as set out in the earlier 2016 SHMA), where they considered that the 2012-based SNPP was a realistic projection because it forecast limited growth in the 15-29 age group going forward.

- 3.30 GL Hearn revisited the modelling using a revised long term migration trend and the 2014-based SNPP (Table 3.2).

Table 3.2 Summary of the city of York SHMA Addendum (June 2016) Range of Scenarios (2012-2032)

	2012-based SNHP Headship Rates		+ uplift to the 25-34 age group headship rates
	Change in Households	Dwellings per Annum	
2012-based SNPP	15,093	783	792
2012-based SNPP (updated)	16,056	833	841
2014-based SNPP	17,134	889	898
10-year Migration Trend	13,457	698	706

Source: City of York SHMA Addendum (June 2016)

- 3.31 Using the latest available data and including a “*market signals adjustment*” [§1.32] of 8dpa as contained in the SHMA “*and recognising concerns around the impact of historic student growth, this addendum identifies an overall housing need of up to 898dpa*”. [§1.20].
- 3.32 An update to the affordable housing need model increases the ‘*bottom line estimate of affordable housing need*’ from 573dpa to 627dpa.
- 3.33 The Addendum draws the following conclusions on OAHN:

“There are concerns relating to historic growth within the student population and how this translates into the SNPP projections. This looks to be a particular concern in relation to the 2014-based SNPP where there is a relatively strong growth in some student age groups when compared with the 2012-based version (which looks to be sound for those particular age groups). Some consideration could be given to longer term dynamics although this does need to recognise that the evidence suggests some shift in migration patterns over the more recent years – a 10 year migration trend using the latest available evidence calculates a need for 706dpa, although as noted this will not fully reflect some of the more recent trends. This projection is therefore not considered to be an appropriate starting point for which to assess housing need although it can be used to help identify the bottom end of a reasonable range.

“Given that the full SHMA document identifies an OAN for 841dpa which sits comfortably within this range set out in this addendum (706dpa – 898dpa) it is suggested that the Council do not need to move away from this number on the basis of the newly available evidence – particularly given the potential concerns about the impact of student growth in the 2014-based SNPP and also longer term trends not reflecting the most recent trends.” [§§1.33-1.34].

Lichfields Previous SHMA Representations

- 3.34 A review of the June 2016 Strategic Housing Market Assessment [SHMA], and the subsequent SHMA Addendum (June 2016) was submitted by Lichfields (then branded as Nathaniel Lichfield & Partners) on behalf of the Companies in September 2016 in response to the City of York Local Plan – Preferred Sites Consultation.
- 3.35 This review provided objective evidence on the local need and demand for housing in the City of York and its Housing Market Area [HMA]. It established the scale of need for housing in the

City of York based upon a range of housing, economic and demographic factors, trends and forecasts, based on the application of Lichfields' HEaDROOM framework.

3.36 More specifically it:

- 1 Considered the approach which needs to be taken to calculating OAHN and sets out the requirements of the Framework, the Practice Guidance and relevant High Court judgments in this context;
- 2 Provided a critique of the 841 dwellings per annum [dpa] identified as the City of York's OAHN in the June 2016 Strategic Housing Market Assessment [SHMA] for the City, and the subsequent SHMA Addendum which recommended a broader OAHN range of 706dpa to 898dpa and considered whether they represent the full, objectively assessed housing need for the City of York;
- 3 Set out the approach taken by Lichfields to define a new OAHN for the City of York, using the latest demographic evidence and economic forecasts and affordable housing needs;
- 4 Provided an analysis of market signals in the City;
- 5 Identified a revised OAHN for the City of York, based on Lichfields' PopGroup modelling; and,
- 6 Summarised the key issues within the SHMA and subsequent Addendum and sets out why it is not compliant with the requirements for an OAHN calculation.

3.37 The review concluded that the SHMA documents make a number of assumptions and judgements which Lichfields considered to be flawed, or which do not properly respond to the requirements of policy and guidance. As a result, the recommended OAHN was not robust and was inadequate to meet need and demand within the HMA.

3.38 The review noted that there were a number of significant deficiencies in the City of York SHMA and Addendum which means that the 841dpa OAHN figure currently being pursued by CYC is not soundly based. In particular:

- 1 The demographic modelling downplayed the robustness of the 2014-based SNPP which were not supported by the evidence in other aspects of the document;
- 2 As a result, the Council's 841dpa OAHN figure was actually below the demographic starting point in the latest 2014-based SNHP of 853hpa even before any adjustments were made;
- 3 Adjustments to headship rates had been conflated with the uplift for market signals. The SHMA did not apply a separate uplift for market signals, but instead made an adjustment to the demographic modelling based on changes to headship rates which should be part of a normal adjustment to the demographic starting point before market signals are considered. As a result, there was no adjustment for market signals at all despite the significant and severe market signal indicators apparent across the City of York;
- 4 A 'black-box' approach had been taken to the economic-led modelling, with key evidence relating to how the job projections had been factored into any PopGroup model being unpublished; and,
- 5 No explicit consideration or uplift applied in respect of delivering more homes to meet the needs of households in affordable housing need. This was despite the SHMA and Addendum indicating a level of affordable housing need (of 573dpa and 627dpa respectively) which would only be met well in excess of the concluded OAHN.

3.39 In combination, the judgements and assumptions applied within the SHMA sought to dampen the level of OAHN across the City of York. Fundamentally, it was considered that the OAHN(s) identified in the SHMA and Addendum failed to properly address market signals, economic or affordable housing needs, as envisaged by the Framework and Practice Guidance as clarified by High Court and Court of Appeal judgements.

- 3.40 Lichfields undertook its own analysis of housing need for the City of York. Based on the latest demographic data, and through the use of the industry standard PopGroup demographic modelling tool, it was Lichfields' view that the OAHN for York was at least 1,125dpa, although there was a very strong case to meet affordable housing needs in full, in which case the OAHN would equate to 1,255dpa (rounded).
- 3.41 If long term migration trends were to continue into the future, this would justify a higher OAHN of 1,420dpa, although due to uncertainties regarding the level of international net migration into York it was considered that less weight should be attached to this figure.
- 3.42 This allowed for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth. Using this range would ensure compliance with the Framework²⁸ by significantly boosting the supply of housing. It would also reflect the Framework²⁹, which seeks to ensure the planning system does everything it can to support sustainable development.

September 2017 SHMA Assessment Update

- 3.43 The stated purpose of GL Hearn's Assessment Update is to review the housing need in York taking into account of the latest demographic information. In particular, it reviews the impact of the 2014-based SNHP and the 2015 Mid-Year Estimates (both published June 2016).
- 3.44 The Assessment Update also reviews the latest evidence on market signals within the City. The report states that this is not a full trend-based analysis but rather a snapshot of the latest evidence to be read in conjunction with the full SHMA document. As such, the report does not revisit the affordable housing need for the City, nor does it update analysis on the mix of housing required or the needs for specific groups.
- 3.45 The report [§2.2] finds that over the 2012-32 period, the 2014-based SNPP projects an increase in population of around 31,400 people (15.7%) in York. This is somewhat higher than the 2012-based SNPP (12.2%) and also higher than the main 2016 SHMA projection (which factored in population growth of 13.7%).
- 3.46 The report [§2.11] states that the official population projections (once they are rebased to include the latest 2015 MYE) indicate a level of population growth which is higher than any recent historic period or any trend based forecast of growth. It should therefore be seen as a positive step to consider these as the preferred population growth starting point.
- 3.47 The analysis [§2.17] finds that by applying the headship rates within the 2014-based SNHP the level of housing need would be for 867dpa – this is c.4% higher than the figure (833dpa) derived in the 2016 SHMA for the main demographic based projection.

Table 3.3 Projected Household Growth 2012-32 - Range of demographic based scenarios

	Change in households	Dwellings (per annum)
2014-based SNPP	17,120	867
2014-based SNPP (+MYE)	17,096	866

Source: SHMA Assessment Update (September 2017)

- 3.48 The report [§2.19] notes that within the SHMA, analysis was also undertaken (as part of the

²⁸ Framework - §47

²⁹ Framework - §19

market signals analysis) to recognise a modest level of suppressed household formation – this essentially took the form of returning the household formation/headship rates of the 25-34 age group back to the levels seen in 2001 (which is when they started to drop). With an uplift to the household formation rates of the 25-34 age group, the housing need (when linked to 2014-based projections when updated) increases to 873dpa. When the mid-year estimates are factored in, the housing need decreases slightly to 871dpa.

Table 3.4 Projected Household Growth 2012-32 - Range of demographic based scenarios (with uplift to headship rates for 25-34 age group)

	Change in households	Dwellings (per annum)
2014-based SNPP	17,232	873
2014-based SNPP (+MYE)	17,209	871

Source: SHMA Assessment Update (September 2017)

3.49 The SHMA Assessment Update [§5.3-5.4] states:

“Furthermore there is also the clear desire of the Government to boost housing delivery, and therefore setting an OAN that is below the most recent official projections while justifiable might be difficult to support.”

“There is however an apparent continued suppression of household formation rates within younger age groups within the official projections. In order to respond to this we have increased the household formation rates in this age group to the levels seen in 2001. The housing need (when linked to 2014-based projections) increases to 873 dwellings per annum. When the mid-year estimates are included the housing need decreases to 871dpa. This should be seen as the demographic conclusions of this report”.

3.50 GL Hearn therefore clearly accepts that an increase in household formation rates is necessary to respond to continued suppression of household formation rates within younger age groups within the official projections. However this ‘demographic conclusion’ of 871dpa does not appear to have been carried forward by GL Hearn through to the next steps of calculating the resultant housing need, as summarised below.

3.51 With regard to market signals and affordable housing the Assessment Update [§3.19] notes that:

“On balance, the market signals are quite strong and there is a notable affordable housing need. Combined these would merit some response within the derived OAN. This is a departure from the previous SHMA and the Addendum which did not make any market signals or affordable housing adjustment.”

3.52 The report considers a single adjustment to address both of these issues on the basis that they are intrinsically linked. The Assessment Update [§3.28] states:

“Given the balance of judgement it would appear that a 10% adjustment could be justified in York on the basis of the previously established affordable housing need the updated market signals evidence.”

3.53 With regard to this matter the Assessment Update [§5.6-5.7] draws the following conclusions:

“In response to both market signals and affordable housing need we have advocated a 10% uplift to the OAN. In line with the PPG this was set against the official starting point of 867dpa. The resultant housing need would therefore be 953dpa for the 2012-32

period.”

“The level of housing need identified is someway higher than the previous SHMA reflecting the increased starting point but also the inclusion of a market signals uplift. This OAN would meet the demographic growth in the City as well as meet the needs of the local economy”.

- 3.54 Lichfields agrees with making an adjustment for demographic and household formation rates to get to 871dpa. However, it is illogical to then revert back to the unadjusted projections of 867dpa and then apply the adjustment for market signals and affordable housing to this lower, discredited figure.
- 3.55 Moving on, GL Hearn models a series of economic growth forecasts. In this regard, they conclude that the level of housing associated with the economic growth projections are lower than the 867/871dpa demographic need, the Assessment Update considers that there is no justification for an uplift to housing numbers in the City to support the expected growth in employment.
- 3.56 As such, the report concludes that by applying a 10% uplift to the demographic starting point of 867dpa results in an OAHN of 953dpa for York City for the 2012-2032 period. However, as noted above, the Council has inserted an ‘Introduction and Context to Objective Assessment of Housing Need’ to the front of the Assessment Update which contests the need for any adjustment to the 2014-based SNHP figure.
- 3.57 It notes that Members of the Council’s Executive at the meeting on 13th July 2017 resolved that on the basis of the housing analysis set out in paragraphs 82 - 92 of the Executive Report, the increased figure of 867dpa.

4.0 Critique of the SHMA Update

Introduction

- 4.1 The Companies have serious concerns and wish to raise strong objections to the way in which the Council has chosen to identify an OAHN of 867dpa and the subsequent identification of this need as the housing requirement in Policy SS1 of the LPP. As noted above, the ‘Introduction and Context to Objective Assessment of Housing Need’ (inserted by the Council at the front of the SHMA Update Assessment) states [page 2]:

“Members of the Council’s Executive at the meeting on 13th July 2017 resolved that on the basis of the housing analysis set out in paragraphs 82 - 92 of the Executive Report, the increased figure of 867 dwellings per annum, based on the latest revised sub national population and household projections published by the Office for National Statistics and the Department of Communities and Local Government, be accepted.”

“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 for market signals (to 953 dwellings per annum), 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.”

- 4.2 This is effectively a ‘policy-on’ intervention by the Council which should not be applied to the OAHN. It has been confirmed in the Courts that OAHN is ‘policy off’ and does not take into account supply pressures. The judgment of Hickinbottom J in Solihull sets out the definition of OAHN [§37]:

“Full Objective Assessment of Need for Housing: This is the objectively assessed need for housing in an area, leaving aside policy considerations (Lichfields emphasis). It is therefore closely linked to the relevant household projection; but is not necessarily the same. An objective assessment of housing need may result in a different figure from that based on purely demographics if, e.g., the assessor considers that the household projection fails properly to take into account the effects of a major downturn (or upturn) in the economy that will affect future housing needs in an area. Nevertheless, where there are no such factors, objective assessment of need may be – and sometimes is – taken as being the same as the relevant household projection.”

- 4.3 With regard to this matter, the SHMA Assessment Update [§§5.8-5.9] clearly states:

“The official projections should be seen a starting point only and housing delivery at this level (867dpa) would only meet the demographic growth of the City. It would not however address the City’s affordability issues.”

“Without the 10% uplift for market signals/affordable housing need the City’s younger population would fail to form properly. This would result in greater numbers residing with parents or friends or in share accommodations such as HMOs.”

- 4.4 GL Hearn is therefore clear that the 867dpa figure is not an appropriate OAHN. On one level, it is the incorrect demographic starting point in any case, which according to GL Hearn’s work is 871dpa following suitable adjustments to the 2014-based SNHP to incorporate the 2015 MYE and accelerated household formation rates. On the second level, there is an array of evidence, which we examine in further detail below, that York City is one of the least affordable local authority areas in Northern England. A market signals uplift of 10% is the very least that would

be appropriate, and indeed we provide evidence that suggests that an even higher uplift, of 20% should actually be applied.

- 4.5 It is therefore not acceptable for the Council to ignore its own housing expert's advice. The Council's approach to identifying an OAHN of 867dpa, as set out in the front section of the SHMA Assessment Update, is policy-on driven and is therefore contrary to the guidance provided by the Courts. The calculation of OAHN should be based on the normal 'policy-off' methodology.
- 4.6 Notwithstanding these points, the remainder of this section provides a detailed critique of GL Hearn's SHMA Assessment Update.

Starting Point and Demographic-led Needs

Population Change

- 4.7 The Practice Guidance³⁰ sets out that in assessing demographic-led housing needs, the CLG Household Projections form the overall starting point for the estimate of housing need, but these may require adjustments to reflect future changes and local demographic factors which are not captured within the projections, given projections are trend based. In addition, it states that account should also be taken of ONS' latest Mid-Year Estimates [MYEs]³¹.
- 4.8 The SHMA Assessment Update applies the 2014-based SNPP which projects an increase in population of around 31,400 people (15.7%) in York. This is higher than the 2012-based SNPP (12.2%) and also higher than the main SHMA projection (which had population growth of 13.7%). It also considers longer term migration trend using the latest available evidence from the 2014-SNPP and the 2015 Mid-Year Estimate.
- 4.9 The SHMA Assessment Update considers housing need based on the (then) latest CLG 2014-based household projections over the period 2012 to 2032.
- 4.10 The Companies agree with the overall principle of taking the 2014-based SNPP as the demographic starting point and rebasing population growth off the latest Mid-Year Population Estimates.
- 4.11 However, it is important to note that the household projections upon which York's OAHN is based relate to C3 uses only, and not C2. Specifically, and of particular relevance to the City of York, CLG's household projections do not include an allowance for students who might be expected to reside in Halls of Residence (termed, along with people living in nursing homes, military barracks and prisons, as the 'Institutional population').
- 4.12 As summarised by CLG in its 2014-based household projections Methodological Report (July 2016), the household projections are based on the projected household population rather than the total population. The difference between the two is the population in communal establishments, also termed the 'institutional' population. This population comprises all people not living in private households and specifically excludes students living in halls of residence:
- "The institutional population is subtracted from the total resident population projections by age, sex and marital status to leave the private household population, split by sex, age and marital status in the years required for household projections."* [page 12]
- 4.13 This is important for the City of York, because it means that if the household projections are used as the basis for calculating the OAHN (which GL Hearn's methodology does), it specifically excludes a substantial proportion of specialised student accommodation needs.

³⁰ Practice Guidance - ID 2a-015-20140306

³¹ Practice Guidance - ID 2a-017-20140306

Household Formation Rates

4.14 The Practice Guidance³² indicates that in respect of household projections:

“The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice...”

“...The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demographic and household formation which are not captured in past trends...rates may have been suppressed historically by under-supply and worsening affordability of housing...”

4.15 The SHMA Assessment Update notes that there is no material difference 2014-based SNHP headship rates and the household formation rates from the 2012-based version.

4.16 The SHMA [§2.19] accepts that there has been a level of suppressed household formation arising from the 25-34 age group and in relation to this matter states [§§5.3-5.4]:

“Furthermore there is also the clear desire of the Government to boost housing delivery, and therefore setting an OAN that is below the most recent official projections while justifiable might be difficult to support.”

“There is however an apparent continued suppression of household formation rates within younger age groups within the official projections. In order to respond to this we have increased the household formation rates in this age group to the levels seen in 2001. The housing need (when linked to 2014-based projections) increases to 873 dwellings per annum. When the mid-year estimates are included the housing need decreases to 871 dpa. This should be seen as the demographic conclusions of this report.”

4.17 GL Hearn clearly accepts that an increase in household formation rates is necessary to respond to continued suppression of household formation rates within younger age groups within the official projections. We agree with this. However this adjusted demographic figure of 871dpa does not appear to have been carried forward by GL Hearn in calculating the resultant housing need, as noted below.

4.18 Lichfields agrees with making an adjustment for demographic and household formation rates. However, it is illogical to revert back to unadjusted projections of 867 dpa and then take this to apply the adjustment for market signals and affordable housing, when an adjusted demographic need of 871dpa has been identified.

Market Signals

4.19 The Framework sets out the central land-use planning principles that should underpin both plan-making and decision-taking. It outlines twelve core principles of planning that should be taken account of, including the role of market signals in effectively informing planning decisions:

“Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.” [S17]

4.20 The Practice Guidance³³ requires that the housing need figure as derived by the household

³² Practice Guidance - ID 2a-015-20140306

³³ Practice Guidance - ID 2a-019-20140306

projections be adjusted to take into account market signals. It indicates that comparisons should be made against the national average, the housing market area and other similar areas, in terms of both absolute levels and rates of change. Worsening trends in any market signal would justify an uplift on the demographic-led needs. In addition, the Practice Guidance³⁴ highlights the need to look at longer terms trends and the potentially volatility in some indicators.

4.21 The Practice Guidance also sets out that:

“...plan-makers should not attempt to estimate the precise impact of an increase...rather they should increase planning supply by an amount that, on reasonable assumptions...could be expected to improve affordability...”³⁵.

4.22 This clearly distinguishes between the demographic-led need for housing (generated by population and household growth) and the market signals uplift which is primarily a supply response over and above the level of demographic need to help address negatively performing market signals, such as worsening affordability.

4.23 The SHMA Assessment Update (Section 3) examines a range of market signals as set out in the Practice Guidance, comparing the City of York to Ryedale, Hambleton, Yorkshire and the Humber region and England. It states that the update is a targeted update to the market signals section looking using recently published data, not a full update, as many of the datasets used have not been updated since publication of the SHMA. Attached at Appendix 1 is Lichfields’ own assessment of market signals in City of York which has been used for comparison purposes.

4.24 The findings of the SHMA Assessment Update can be summarised (with Lichfields’ commentary included) as follows:

- 1 **Land Prices** – No analysis has been presented, as was the position on the 2016 SHMA. As noted in our market signals assessment in Appendix 1, CLG land value estimates suggest a figure of £2,469,000 per hectare, well above the equivalent figure for England (excluding London) of £1,958,000.
- 2 **House Prices** – The 2016 SHMA outlined significant house price growth in the HMA between 2011 and 2007. By Q4 2014 house prices in York had reached £195,000 and by Q2 2016 this had increased to £225,000. The Assessment Update notes that, based on 2016 data, the average (median) house price in York was £215,000, compared to £148,000 across the Yorkshire and Humber region. Our market signals analysis in Appendix 1 suggests that the average (median) house price in York in 2016 was £220,000 compared to £199,995 for the North Yorkshire region. It is particularly important to note that over the previous 17 years (1999-2016), median house prices have increased by 244% (or £156,000) in York, compared to 204% nationally and 199% across North Yorkshire as a whole.

As set out in the Practice Guidance, higher house prices and long term, sustained increases can indicate an imbalance between the demand for housing and its supply. The fact that York’s median house prices have effectively tripled in 17 years, from £64,000 in 1999 to £220,000 in 2016, and have risen at a much faster rate than comparable national and sub-regional figures, suggests that the local market is experiencing considerable levels of stress.

- 3 **Rents** – The Assessment Update [§3.8] notes that the most recent data shows that England has grown to £650 (+8%), while York has seen median rental prices increase to £700 (+4%). In contrast rents in the region only grew by 1% to £500 per month. The Assessment Update [§3.9] finds that the most recent data shows a strong upward trend in the number of rental transactions in York although they have been falling over the last six months. In York rental transactions are currently 73% higher than in September 2011, showing a

³⁴ Practice Guidance - ID 2a-020-20140306

³⁵ *ibid*

continued return to the longer term trend than seen in the previous SHMA. By comparison, in Yorkshire and the Humber rental volumes are still slightly above (6%) past figures. Nationally, over this period there has been a slight downward trend.

Our market signals analysis in Appendix 1 shows that Median rents in York are £725 per month, with median rents ranging from £595 per month for a 1 bed flat, to £1,500 per month for a 4+ bed house. All of these figures are significantly higher than the national average, with overall average rents comprising £675 across England, and £585 for North Yorkshire. Rental levels are therefore 7.4% higher than comparable national figures. High and increasing private sector rents in an area can be a further signal of stress in the housing market.

- 4 **Affordability** – The Assessment Update [§3.10] acknowledges the affordability issues faced within the HMA with the Median Ratio being 8.3 times earnings in 2015 (compared to 7.6 nationally), whilst the Lower Quartile [LQ] ratio is 8.9 times earnings (compared to 7.0 nationally). However, it does not discuss this stark indicator of supply/demand imbalance, preferring to note instead that much of the growth in (un)affordability took place prior to 2005, with limited changes to affordability in the past decade[§3.11].

Lichfields' market signals analysis in Appendix 1 shows that although the ratio fell substantially from a peak of 8.14 in 2008 following the financial crash and subsequent economic downturn, it has steadily increased since 2009 at a much faster rate than North Yorkshire as a whole. This suggests that levels of affordability are declining in York at a pace which is not the case for the rest of the sub-region (and indeed, for the country as a whole). In 2016, the median house price in York City was approximately 9.0-times the LQ workplace-based income, compared to 7.8 for North Yorkshire and 7.2 nationally.

Our analysis shows the over the past 19 years, the ratio of lower quartile house prices to lower quartile earnings in York has been consistently above the national average, with the gap widening over time. Indeed, the rate of increase is worrying – between 2002 and 2016, the affordability ratio increased by 39%, significantly above the comparable growth rate for North Yorkshire (+27%) and England (+37%).

The affordability ratio highlights a constraint on people being able to access housing in York, with house price increases and rental costs outstripping increases in earnings at a rate well above the national level.

- 5 **Rates of Development** – the Practice Guidance is clear that historic rates of development should be benchmarked against the planned level of supply over a meaningful period. The Assessment Update [§3.13] examines housing completions data for York dating back to 2004/05 and sets these against the annual housing target from 2004/05 to 2015/16. With the exception of the last year, housing delivery in York has missed the target each year since 2007. Overall delivery targets for these years was missed by 20% which equals 2,051 units below the target level. GL Hearn notes [§3.14] that under-delivery may have led to household formation (particularly of younger households) being constrained and states that this point is picked up in the report which uses a demographic projection based analysis to establish the level of housing need moving forward.

The Assessment Update [§3.15] considers that this past under-delivery is not a discrete part of the analysis but is one of the various market signals which indicate a need to increase provision from that determined in a baseline demographic projection. It notes that that this market signal will require upward adjustment through consideration of migration and household formation rates rather than just a blanket increase based on the level of 'shortfall'.

It is clear from the Council's own evidence that the City has consistently under-delivered housing, with a failure to deliver anything more than 525 dwellings in any single year between 2007 and 2015. The policy benchmarks suggest that the level of past under-

delivery is 1,793 dwellings over the past 12 years. Furthermore, the Council's already low housing delivery figures have been artificially boosted by the inclusion of student accommodation in the completions figures. For example, CYC's 2012/13 Annual Monitoring Report states that 482 (net) dwellings were completed in 2012/13, but this figure includes 124 student cluster flats. The 6 months completions data set out in CYC's Housing Monitoring Update (Table 3, October 2017) suggested that the Council was continuing to rely on student housing completions to boost its housing numbers, with 637 of the total 1,036 net completions during the first half of the 2017/18 monitoring year comprising privately managed off-campus student accommodation.

- 6 **Overcrowding** - No analysis has been presented. Our market signals analysis in Appendix 1 shows overcrowding against the occupancy rating in York is not severe, with 7.10% of households living in a dwelling that is too small for their household size and composition. This compares to 8.7% nationally. However, it represents a significant increase of 2 percentage points on the 5.1% recorded in York in 2001, which is above the national trend (which had increased by 1.6 percentage points from 7.1% in 2011). From our analysis we also note that when compared against neighbouring Yorkshire districts, York is the worst performing district regarding the rate of change in overcrowded households.

4.25 In response to both market signals and affordable housing need, the Assessment Update advocates a 10% uplift to the OAN [§3.31].

4.26 Lichfields agrees that based on the market signals analysis there are clear housing market pressures, particularly regarding affordability within the HMA. The Practice Guidance³⁶ is clear that any market signals uplift should be added to the demographic-led *needs* as an additional *supply* response which could help improve affordability, and further goes on to clarify that:

"...plan makers should not attempt to estimate the precise impact of an increase in housing supply. Rather they should increase planned supply by an amount that, on reasonable assumptions...could be expected to improve affordability..." (Lichfields emphasis)

4.27 The Practice Guidance³⁷ is also clear that:

"...the more significant the affordability constraints...and the stronger the other indicators of high demand... the larger the improvement in affordability needed and, therefore the larger the additional supply response should be."

4.28 Whilst it is not clear cut from the Practice Guidance how an upwards adjustment should be calculated, some recent Local Plan Inspector's findings have provided an indication as to what might be an appropriate uplift. The Inspector's Report into the Eastleigh Borough Local Plan (11th February 2015)³⁸ provide interpretation of the Practice Guidance in terms of a reasonable uplift on demographic-led needs in light of market signals:

"It is very difficult to judge the appropriate scale of such an uplift. I consider a cautious approach is reasonable bearing in mind that any practical benefit is likely to be very limited because Eastleigh is only a part of a much larger HMA. Exploration of an uplift of, say, 10% would be compatible with the "modest" pressure of market signals recognised in the SHMA itself." [§§40-41].

4.29 The Eastleigh Inspector ultimately concluded that a modest uplift of 10% is a reasonable proxy for quantifying an increase from purely demographic based needs to take account of 'modest' negatively performing market signals. Furthermore, Inspectors have used figures of up to 20% for 'more than modest' market signal indicators, notably in the case of Canterbury, where the

³⁶ Practice Guidance - ID:2a-020-20140306

³⁷ Practice Guidance - ID:2a-020-20140306

³⁸ http://www.eastleigh.gov.uk/pdf/ppi_Inspectorsreport12Feb15.pdf

Inspector concluded that:

“Taking these factors in the round it seems to me that 803dpa would achieve an uplift that took reasonable account of market signals, economic factors, a return to higher rates of household formation and affordable housing needs.”³⁹

4.30 From the indicators set out by Lichfields in Appendix 1, as shown in Table 4.1, and from the commentary and analysis undertaken by GL Hearn, we consider that the current levels of market stress should be considered more severe than the ‘modest’ uplift the SHMA suggests. An application of other approaches (discussed above) would suggest an uplift of 20% could be appropriate for the City of York.

4.31 Drawing together the individual market signals above begins to build a picture of the current housing market in and around York; the extent to which demand for housing is not being met; and, the adverse outcomes that are occurring because of this. The performance of York against County and national comparators for each market signal is summarised in Table 4.1. When quantified, York has performed worse in market signals relating to both absolute levels and rates of change against North Yorkshire and England in 13 out of 28 measures.

Table 4.1 Summary of York Market Signals against North Yorkshire and England

Market Signal	North Yorkshire		England	
	Absolute Figure	Rate of Change	Absolute Figure	Rate of Change
House Prices	Worse	Worse	Better	Worse
Affordability Ratios	Worse	Worse	Worse	Worse
Private Rents	Worse	Worse	Worse	Better
Past Development	~	~	~	~
Homelessness (Households in Temporary Accommodation)	Better	Better	Better	Better
Homelessness (Households in Priority Need)	Better	Better	Better	Better
Overcrowding (Overcrowded Households)	Worse	Worse	Better	Worse
Overcrowding (Concealed Families)	Same	Same	Better	Better

Source: Lichfields Analysis

Footnote: Worse = performing worse against the average
 Better = performing the same or better against the average
 ~ = data not available

4.32 It is clear that the City is currently facing very significant challenges in terms of house prices and private rental values and under delivery, causing affordability difficulties. The GL Hearn analysis is an improvement from the 2016 SHMA and clearly is an improvement from the Council’s approach to identifying an OAHN of 867dpa, but even so, is inadequate to address the current housing crisis. For the aforementioned reasons a 20% uplift is preferable.

4.33 Whilst it can only be applied limited weight at the current time, Lichfields also note that the CLG methodology, based on the median workplace based affordability ratio, would suggest an uplift of 27% for market signals.

4.34 GL Hearn also conflates market signals and affordable housing in the 10% uplift, which is a fundamental misreading of the Practice Guidance, and should be addressed separately (see below for affordable housing commentary).

³⁹Canterbury District Council Local Plan Examination August 2015, Inspector’s Letter and Note on main outcomes of Stage 1 Hearings, paragraph 26.

Economic Growth

- 4.35 With regards to considering the need to uplift a housing figure to take account of the economic potential of the local authority, the Framework sets out the following:

“The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.” [S19]

- 4.36 The SHMA Assessment Update presents no alternative to the work in the June 2016 SHMA. It states [S4.3] that the housing need required to meet the economic growth is lower than the demographic need. Furthermore evidence of more recent forecasts suggests that the economic growth will be even lower than anticipated. Therefore GL Hearn considers that on balance, there is unlikely to be any justification for an uplift to housing numbers in the City to support expected growth in employment. The Update states that the uplift for market signals would see the likelihood for an economic uplift reduce.

- 4.37 Lichfields considers that this approach fails to address the concerns raised in our previous submissions on behalf of the Companies to the Preferred Sites Consultation. Included in those submissions was ‘Technical Report 1’ which noted that June 2016 SHMA presents a suppressed picture of likely economic growth, drawing upon economic forecasts produced in 2014, which are outdated. The submission noted that we could only provide a limited analysis on the robustness of GL Hearn’s assessment of the implications of the job forecasts as they had not set out their assumptions in detail, and we reserved the right to review these assumptions if/when they were provided by GL Hearn.

- 4.38 Given that the SHMA Assessment Update provides no further information on this matter it has not been possible for Lichfields to make any further analysis at this stage. On this basis, the concerns raised on behalf of the Companies in Technical Report 1 still stand, particularly as the LPP Policy SS1 identifies a specific target to provide sufficient land to accommodate an annual provision of around 650 new jobs to support sustainable economic growth.

Affordable Housing Needs

- 4.39 In line with the Framework⁴⁰, LPAs should:

“...use their evidence based to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing...”

“...prepare a SHMA which...addresses the need for all types of housing, including affordable.”

- 4.40 The Practice Guidance⁴¹ sets out a staged approach to identifying affordable housing needs, and states that affordable housing need should be:

“...considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments...an increase in the total housing figures included in the plan should be considered where it could help deliver the required number of affordable homes.”

- 4.41 As set out in Section 2.0, two High Court Judgements go to the heart of addressing affordable housing within the identification of OAHN. ‘Satnam’ establishes that affordable housing needs are a component part of OAHN, indicating that the ‘proper exercise’ is to identify the full

⁴⁰ Framework - Paragraphs 47 and 159

⁴¹ Practice Guidance - ID: 2a-022-20140306 to 2a-029-20140306

affordable housing needs and then ensure that this is considered in the context of its likely delivery as a proportion of mixed market/affordable housing development. ‘Kings Lynn’ builds on ‘Satnam’, identifying that affordable housing needs “*should have an important influence increasing the derived OAHN since they are significant factors in providing for housing needs within an area.*” [§36] This is clear that affordable housing needs are a substantive and highly material driver of any conclusion on full OAHN.

4.42 The SHMA Assessment Update states that it does not review affordable housing need but the situation is unlikely to have changed significantly from the 2016 SHMA. The 2016 SHMA identified a net affordable housing need of 573 homes per annum or 12,033 dwellings over the 2012-2033 period. This suggests a worsening situation when compared with the previous figure of 486 affordable homes per annum needed in the previous 2011 SHMA, produced by GVA.

4.43 The SHMA Assessment Update [§3.3] suggests that large parts of this need are either existing households (who do not generate need for additional dwellings overall) or newly forming households (who are already included within the demographic modelling).

4.44 It further states [§§3.17-3.18] that:

“The City of York Council currently have an affordable housing policy of up to 30%. The SHMA identified a net affordable housing need of 573 dwellings. Based on this level of need and the current policy the City would require to deliver 1,910 dwellings per annum. To put this in context the City has only delivered more than 1000 homes once since 2004-5. Using a lower policy target would result in an even higher need.”

“While there is clearly an affordable housing issue in the City many of the households in need are already in housing (just housing that is not suitable for some reason such as overcrowding) and therefore do not generate a need for additional dwellings”.

4.45 The provision of the net affordable housing need identified is likely to be unrealistic given past dwelling completions in City of York. With regard to this matter the SHMA Assessment Update states [§3.28]:

“Given the balance of judgement it would appear that a 10% adjustment could be justified in York on the basis of the previously established affordable housing need the updated market signals evidence.”

4.46 In taking this approach, GL Hearn is effectively conflating the uplift resulting from affordable housing need with uplift resulting from market signals analysis. These are two separate steps in the Practice Guidance and should not be combined in this manner.

4.47 Lichfields has not analysed in detail the figures forming the assessment of affordable housing needs, due in part to limitations on access to the underlying data; instead, Lichfields has focused on how this need has informed the OAHN conclusion.

Addressing Affordable Housing Needs

4.48 Having identified the affordable housing needs, the Practice Guidance requires an assessment of its likely delivery to consider whether there is a need to uplift or adjust the OAHN and planned housing supply in order to address affordable housing needs. This is what the ‘Satnam’ judgment calls the ‘proper exercise’ and is undertaken by the 2016 SHMA within Figure 30. This concludes that to meet affordable housing need in full the City of York would need to deliver 573dpa. At a delivery rate of 30% of overall housing, this means that the City would need to deliver 1,910dpa to address affordable housing needs in full.

4.49 Taking into account affordable need within the calculation of OAHN does not necessarily involve a mechanistic uplift, or an indication that such identified needs must be met in full. It

has to be a scenario which, on a reasonable basis, could be expected to occur. This is set out in the Kings Lynn judgment which concluded:

“...This is no doubt because in practice very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice. That is because the vast majority of delivery will occur as a proportion of open-market schemes and is therefore dependent for its delivery upon market housing being developed.” [§35]

This is also consistent with the Practice Guidance⁴² which sets out the assessment of need “does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur.”

- 4.50 However, in line with the High Court Judgments, this still needs to be an uplift of consequence, insofar as it can reasonably be expected to occur. This will inevitably need to involve judgement, based on relevant evidence, as to the extent to which any scale of uplift could be reasonably expected to occur.
- 4.51 The SHMA ultimately does not use the identified acute affordable housing needs in a way in which it has “an important influence in increasing the derived F[ull] OAN” as per the Kings Lynn judgment.
- 4.52 The Local Plan Expert Group [LPEG], in its Report to the Secretary of State for Communities and Local Government in March 2016, recommended various changes to the Practice Guidance with the remit of considering how local plan-making could be made more efficient and effective. Although very limited weight can be given to the LPEG approach given that it is not policy or endorsed by Government, it is at least helpful in seeking to understand the general ‘direction of travel’ of defining OAHN and what an appropriate response might be to define the influence of market signals and affordable housing needs. LPEG recommended changes to the preparation of SHMAs and determination of OAHN.
- 4.53 With regard to affordable housing need in the preparation of SHMAs and determination of OAHN it proposed that where the total number of homes that would be necessary to meet affordable housing need is greater than the adjusted demographic-led OAHN, then this figure (953dpa) should be uplifted by a further 10%. The 10% uplift was intended to provide a streamline approach that removes judgement and debate from the process of setting OAHN (as opposed to what might be the most accurate under current Practice Guidance).
- 4.54 Given the significant affordable housing need identified in City of York Lichfields considers that this 10% uplift would be appropriate in this instance and should be applied to the OAHN.

MHCLG Standardised Approach to OAHN

- 4.55 As noted in Section 2, MHCLG has recently published for consultation the draft Planning Practice Guidance, which sets out the standard method for calculating local housing need, including transitional arrangements first set out in “*Planning for the right homes in the Right Places*”..
- 4.56 Whilst relatively limited weight can be attached to this document at present given its consultation status, for the City of York, if adopted as MHCLG proposes, the approach would mean that the OAHN over the period 2016-2026 is 1,070 dpa.
- 4.57 This is based on an annual average level of household growth of 844 dpa between 2016 and 2026, uplifted by a very substantial 27% to address the fact that the latest median workplace-based affordability ratio is 8.3.

⁴² Practice Guidance - ID:2a-003-20140306

Conclusions on the City of York's Housing Need

- 4.58 The Council's approach to identifying an assessed need of 867 dpa in the introductory section of the SHMA Assessment Update is fundamentally flawed. This is a 'policy-on' intervention by the Council which should not be applied to the OAHN. It has been confirmed in the Courts that FOAN is 'policy off' and does not take into account supply pressures. The Council's approach to identifying the FOAN, as set out in the SHMA Assessment Update, would therefore be susceptible to legal challenge. The calculation of OAHN should therefore be based on the normal 'policy-off' methodology.
- 4.59 There are a number of significant deficiencies in the SHMA Assessment Update which means that even the higher 953 dpa OAHN figure identified in the Assessment Update is not soundly based. In particular:
- 1 GL Hearn clearly accepts that an increase in household formation rates is necessary to respond to continued suppression of household formation rates within younger age groups within the official projections. However this demographic conclusion of 871 dpa does not appear to have been carried forward by GL Hearn in calculating the resultant housing need, as noted below. Lichfields agree with making an adjustment for demographic and household formation rates. However, it is illogical to revert back to unadjusted projections of 867 dpa and then take this to apply the adjustment for market signals and affordable housing, when a demographic need of 871 dpa has been identified.
 - 2 The Assessment Update fails to distinguish between the affordable housing needs of the City of York and the supply increase needed to address market signals to help address demand. Instead the SHMA blends the two elements within the same figure resulting in a conflated figure which is lower than the level of uplift deemed reasonable by the Eastleigh and Canterbury Inspectors, despite the fact that market signals pressures in York indicate signs of considerable stress and unaffordability. The Practice Guidance is clear that the worse affordability issues, the larger the additional supply response should be to help address these.
 - 3 Given the significant affordable housing need identified in City of York Lichfields consider that a 20% uplift would be appropriate in this instance and should be applied to the OAHN.
- 4.60 The scale of objectively assessed need is a judgement and the different scenarios and outcomes set out within this report provide alternative levels of housing growth for the City of York. Lichfields considers these to be as follows:
- 1 **Demographic Baseline:** The 2014-based household projections indicate a net household growth of 867dpa between 2014 and 2024 (including a suitable allowance for vacant/second homes. Once a suitable adjustment has been made to rebase the projections to the (slightly lower) 2015 MYE, and through the application of accelerated headship rates amongst younger age cohorts takes the demographic starting point to 871 dpa.
 - 2 **Market Signals Adjustment:** GL Hearn's uplift is 10%. However, for the reasons set out above, Lichfields considers that a greater uplift of 20% would be more appropriate in this instance. When applied to the 871 dpa re-based demographic starting point, this would indicate a need for 1,045 dpa.
- The demographic-based projections would support a reasonable level of employment growth at levels above that forecast by Experian, past trends or the Blended job growth approach. As such, no upward adjustment is required to the demographic-based housing need figures to ensure that the needs of the local economy can be met;
- The scale of affordable housing needs, when considered as a proportion of market housing delivery, implies higher levels of need over and above the 1,045 dpa set out above. It is considered that to meet affordable housing needs in full (573 dpa), the OAHN range should be adjusted to 1,910 dpa @30% of overall delivery. It is, however, recognised that this level

of delivery is likely to be unachievable for York. Given the significant affordable housing need identified in City of York Lichfields consider that a further 10% uplift would be appropriate in this instance and should be applied to the OAHN, resulting in a final figure of **1,150 dpa**.

This is **7.5% higher** than the MHCLG proposed standardised methodology figure of 1,070 dpa.

- 4.61 This allows for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth. Using this range would ensure compliance with the Framework by significantly boosting the supply of housing. It would also reflect the Framework, which seeks to ensure the planning system does everything it can to support sustainable development.
- 4.62 It is emphasised again that CLG's household projections explicitly exclude the housing needs of students living in halls of residence. GL Hearn has used the latest CLG 2014-based household projections to underpin its housing OAN for York. The market signals adjustment it makes does not address the separate specialised housing needs of students, which would be additional to the target identified.

5.0 **Approach to Assessing Housing Land Supply**

Introduction

- 5.1 This section sets out the requirements of the Framework and the Practice Guidance in establishing the supply of housing land to meet the housing needs of an area. This will provide the benchmark against which the SHLAA and emerging Local Plan will be assessed, to ensure the necessary requirements are met. In addition, relevant High Court judgments have been referenced to set out the requirements of a housing supply calculation in a legal context.

Policy Context

National Planning Policy Framework

- 5.2 The Framework outlines a two-step approach to setting housing requirements in Local Plans. Firstly, to define the full objectively assessed need for development and then secondly, to set this against any adverse impacts or constraints which would mean that need might not be met. This is enshrined in the approach defined in the Framework⁴³ which sets out the presumption in favour of sustainable development.

- 5.3 The Framework⁴⁴ stresses the intention of the Government to significantly boost the supply of housing. As a consequence, the focus of national policy is to ensure the delivery of housing and, in that context, the Framework requires LPAs to:

"identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;

*identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15..."*⁴⁵

- 5.4 There is therefore a need for the Council to identify both a 5-year supply and a longer-term supply as part of the preparation of the Local Plan.

- 5.5 For the purpose of the supply assessment, the Framework advises that only deliverable sites should be included within the first 5-years. To be considered deliverable:

"...sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing

⁴³ Framework - §14

⁴⁴ Framework - §47

⁴⁵ Framework - §47

plans.”⁴⁶

- 5.6 The Framework states that for the period 5-15 years developable sites may be included, which are sites that are:

“...in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.”⁴⁷

- 5.7 The Framework sets out the approach to defining such evidence which is required to underpin a local housing supply. It sets out that in evidencing housing supply:

“LPAs should have a clear understanding of housing needs in their area. They should:

...

“...prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.”⁴⁸

National Planning Practice Guidance

- 5.8 The Practice Guidance⁴⁹ provides further guidance on how an assessment of the housing supply is to be undertaken. It urges LPAs to assess the suitability, availability and achievability of sites, including whether the site is economically viable, to determine whether a site can be considered deliverable over the plan period.

- 5.9 In this context the Practice Guidance makes it clear that a site will be considered available when:

“...there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell. Because persons do not need to have an interest in the land to make planning applications, the existence of a planning permission does not necessarily mean that the site is available. Where potential problems have been identified, then an assessment will need to be made as to how and when they can realistically be overcome. Consideration should also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.”⁵⁰

- 5.10 The Practice Guidance indicates that a site is considered achievable for development where:

“...there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.”⁵¹

- 5.11 The LPA, when preparing a Local Plan, is urged to use the information on suitability, availability, achievability and constraints to assess the timescale within which each site is capable of development. The Practice Guidance suggests that this may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites

⁴⁶ Framework – Footnote 11

⁴⁷ Framework – Footnote 12

⁴⁸ Framework - §159

⁴⁹ Practice Guidance – ID:3-018-20140306

⁵⁰ Practice Guidance – ID:3-020-20140306

⁵¹ Practice Guidance – ID:3-021-20140306

allowance should be made for several developers to be involved. The Practice Guidance⁵² makes it clear that the advice of developers and local agents will be important in assessing lead-in times and build-out rates by year.

- 5.12 The Practice Guidance⁵³ accepts that a windfall allowance may be justified if a local planning authority has compelling evidence as set out in the Framework. In addition, it states that:

*“Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area (using the same criteria as set out in paragraph 48 of the National Planning Policy Framework).”*⁵⁴

- 5.13 The Practice Guidance requires LPAs to collate this above information and present it in an indicative trajectory which:

*“...should set out how much housing and the amount of economic development that can be provided, and at what point in the future. An overall risk assessment should be made as to whether sites will come forward as anticipated.”*⁵⁵

- 5.14 In relation to the assessment of whether sites are deliverable within the first 5-years the Practice Guidance⁵⁶ indicates that deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within 5-years. It goes on to state:

*“...planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe.”*⁵⁷

Recent Legal Judgments

- 5.15 The High Court decision in the case of Exeter City Council and Secretary of State⁵⁸ is relevant to York as it considers the appropriateness of including student accommodation in the calculation of the housing supply in accordance with the Framework. Exeter is a University City similar to York and included student accommodation within their housing land supply.

- 5.16 The Inspector who determined the appeal⁵⁹ considered the inclusion of student accommodation in the 5-year supply based on the Practice Guidance which states:

*“All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Notwithstanding, local authorities should take steps to avoid double counting.”*⁶⁰

⁵² Practice Guidance – ID:3-023-20140306

⁵³ Framework - §48

⁵⁴ Practice Guidance – ID:3-024-20140306

⁵⁵ Practice Guidance – ID:3-025-20140306

⁵⁶ Practice Guidance – ID:3-031-20140306

⁵⁷ Practice Guidance – ID:3-031-20140306

⁵⁸ Exeter City Council v Secretary of State for Communities and Local Government [2015] EWHC 1663 (Admin)

⁵⁹ Land at Home Farm, Church Hill, Pinhoe – Insp. Decision 29.10.14 [Ref: APP/Y1110/A/14/2215771]

⁶⁰ Practice Guidance – ID:3-036-20140306

5.17 The Inspector, in her decision letter, stated:

“The Council submit that the provision of student accommodation releases housing that would otherwise be occupied by students and thereby indirectly releases accommodation within the housing market. For this reason it believes that all student accommodation should be included within the housing delivery and housing land supply figures. This view is not consistent with the PPG because it is not based on any assessment of the extent to which the provision of student accommodation has released general market housing.”

5.18 She went on:

“Where student population is relatively stable, and the number of general market dwellings occupied by students declines as a consequence of the provision of student accommodation, I consider the inclusion of such accommodation as part of the housing supply would be consistent with the guidance within the PPG. However, within Exeter, due to the considerable increase in the number of students relative to the provision of purpose-built student accommodation, there has not been a reduction in the number of general market dwellings occupied by students. On the contrary, there has been a significant increase...”⁶¹

5.19 The High Court agreed that the Council did not set out any specific evidence to justify that the development of student accommodation would release housing to the market elsewhere. It stated that:

“...it simply relied upon paragraph 3.38 of the PPG in support of its proposition that, irrespective of the extent (if any) that student accommodation was included in the housing requirement figure adopted.”⁶²

5.20 As a consequence, the High Court stated that the Appeal Inspector:

“... was correct not to accede to the Council’s submission that all student accommodation supplied should or could be set off against the housing requirement. She was correct not to be persuaded by the Developers’ contention that she could not under any circumstances take into account student accommodation. She was correct to look at the facts of this case and determine whether, on the evidence before her, there was any basis for taking any of the new student accommodation into account ... she properly accepted (in paragraph 47) that, although there was currently no evidence to show that the provision of student accommodation has released housing into the general market in Exeter, the situation may in the future change if (e.g.) the delivery of student accommodation significantly exceeded the increase in student population.”⁶³

Conclusion

5.21 It is against this policy context that the proposed housing supply should be considered. In practice, applying the Framework and Practice Guidance to achieve a robust supply that will meet the needs of the community is an evidence based process which should use transparent and justifiable assumptions on lead-in times, delivery rates and density. In addition, it should be clear that the sites are available and achievable over the plan period.

5.22 In the case of York, there are inherent dangers in including student housing in the supply if there is no evidence that there has been a reduction in the number of general market dwellings

⁶¹ Land at Home Farm, Church Hill, Pinhoe – Insp. Decision 29.10.14 [Ref: APP/Y1110/A/14/2215771] - §44 & §47

⁶² Exeter City Council v Secretary of State for Communities and Local Government [2015] EWHC 1663 (Admin) - §37

⁶³ Ibid - §44

occupied by students as a direct result of the provision of purpose-built student accommodation.

6.0 Council's Housing Supply Evidence

Introduction

6.1 Detailed representations on the Council's housing land supply evidence were submitted on behalf of the Companies to the City of York Local Plan - Preferred Sites Consultation (in 'Technical Report 2: Housing Supply'). These representations concluded the following:

- 1 The Council had not produced a trajectory or a detailed assessment of the 5-year supply position as required by the Framework. No evidence had therefore been produced to demonstrate the Council's housing supply position.
- 2 The assessment of the balance between the housing requirement and supply demonstrated that there was a significant shortfall for both the plan period and 5-year period. In these circumstances, the emerging plan was not 'sound' as required by the Framework, as the Council has not demonstrated an adequate short and longer-term supply as required by national guidance.
- 3 The Council should allocate additional land to meet the housing needs of the community and these sites should be able to deliver early in the plan period. This is the only approach that would deliver a 'sound' plan and enable the much needed investment in new housing to meet the community's needs.

These concerns have not been addressed and reference is accordingly made below in Lichfields' assessment of the Council's latest evidence.

6.2 Before considering the adequacy of the Council's supply, it is important to consider the nature and extent of the Council's evidence base in relation to the supply. Evidence on the Council's supply is contained in a number of different places:

- 1 The City of York Strategic Housing Land Availability Assessment [SHLAA] (September 2017);
- 2 The City of York Local Plan Publication Draft (March 2018);
- 3 Half Year Housing Monitoring Update for Monitoring Year 2017/18 (1st April 2017 and 30th September 2017); and,
- 4 The City of York Windfall Allowance Technical Paper 2017 (SHLAA Annex 5).

Housing Completions

6.3 The Council has provided detailed site by site delivery figures for the past five monitoring years (2012/13 to 2016/17). In addition, the Council's annual completion figures since 2007/08 are contained in the September 2017 Half Year Housing Monitoring Update.

6.4 The Council has included student specific accommodation within their completions figures and their forward supply figures. Based on recent High Court decisions it is clear that robust evidence must be provided to justify the inclusion of student accommodation in the housing supply, specifically that the accommodation will release housing into the general market.

6.5 York Council has not provided any evidence to demonstrate that the provision of additional student accommodation would result in the release of housing into the market as required by national policy. Furthermore, the Council's June 2016 SHMA outlines that the York St John University is, over the next five years, seeking to "*grow our student numbers from 6,400 to 7,300*"⁶⁴. This reflects an aim to achieve growth in student numbers of 14.1% by 2020.

⁶⁴ City of York, June 2016 Strategic Housing Market Assessment, §10.71

- 6.6 Based on national policy, the recent High Court decision coupled with the expected growth in student numbers in York, it is considered that it is inappropriate to include student accommodation within the Council's supply. This is because there is no justification regarding how it will result in the release of current housing into the general housing market.
- 6.7 In this context, the Council has included the delivery of 124 units in monitoring year 2012/13 from the site at 6-18 Hull Road. However, a total of 97 of the units are not self-contained and share communal/living areas. As such, these bedspaces cannot contribute towards the Council's housing completion figures as there is no evidence that they have released housing to the general market. That said, we have included the delivery of 27 units from this site as they are self-contained studio apartments which could be sold on the open market at some stage in the future.
- 6.8 The Council has also included the delivery of 91 units in the monitoring year 2016/17 for the site at Hallfield Road. The majority of the units on this scheme are not self-contained and share communal/living areas. As such, these bedspaces cannot also contribute towards the Council's housing completion figures as there is no evidence that they have released housing to the general market. However approximately 9% of these units are studio apartments which could be sold on the open market at some stage in the future, so we have included 8 units from this scheme on this basis.
- 6.9 Table 6.1 sets out the Council's past completion figure and provides a cumulative running total since 2012/13. It also sets out Lichfields' assumed completions figures and provides a running total.

Table 6.1 Housing Completions

Year	Council Position		Lichfields' Position	
	Comp.	Cum +/-	Comp.	Cum +/-
2012/13	482	482	385	385
2013/14	345	827	345	730
2014/15	507	1,334	507	1,237
2015/16	1,121	2,455	1,121	2,358
2016/17	977	3,432	894	3,252
Totals	3,432		3,252	

Source: City of York Council

2017 SHLAA

- 6.10 The Framework⁶⁵ sets out that local planning authorities should prepare a SHLAA to establish assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. Furthermore, the Practice Guidance⁶⁶ outlines that the assessment of land availability is an important step in the preparation of Local Plans. The provision of an up to date SHLAA approach ensures that all land is assessed together as part of plan preparation to identify which sites or broad locations are the most suitable and deliverable for a particular use.
- 6.11 The Council has published its City of York Strategic Housing Land Availability Assessment

⁶⁵ Framework - §159⁶⁶ Practice Guidance - ID: 12-018-20140306

September 2017. This document supersedes previous versions of the SHLAA to present the sites assessed for their development potential to form part of the evidence base for York's Local Plan. The 2017 SHLAA accompanied the Local Plan Pre Publication [LPPP] Draft, setting out the methodology for site selection in the plan, and detail of which sites have been allocated.

Site Selection

- 6.12 The 2017 SHLAA outlines the previous consultation undertaken by City of York Council in relation to site identification and consultation/engagement. It states [§2.3.1] that a two stage suitability process was undertaken in order to sieve out the potential sites most suitable for development:
- 1 Stage 1: Sustainable Location Assessment which uses the shapers set out in the emerging Spatial Strategy to assess potential site suitability. The SHLAA states that the methodology was also informed by work on the Sustainability Appraisal.
 - 2 Stage 2: Technical Officer Group which considers more site specific suitability of sites which successfully passed Stage 1 and determined whether they should progress as development sites. The SHLAA states that any sites which were wholly or partly removed from the site selection process following the Stage 1 analysis will be given the opportunity to respond to the assessment with supporting evidence.
- 6.13 Further details on the scoring process and methodology used are provided in Annex 3 of the SHLAA. As the site selection and criteria assessment process was developed in 2013, the SHLAA indicates that subsequent guidance on Impact Risk Zones for SSSIs, Flood Risk and Agricultural Land Value has been taken into consideration. It also explains the basis on which the availability and deliverability of sites has been determined.
- 6.14 The SHLAA [§§2.5.1-2.5.2] outlines how the availability of sites has been determined. It states:
- “The majority of sites assessed were received through the Call for Sites process or subsequent Local Plan consultations. Through this process we asked that landowner details were provided to us to ensure that we could confirm availability and that the site had a willing landowner. We also asked for details of whether the site had been promoted commercially or by an agent as well as when the site would be become available for development. Since 2012, the availability of sites has been reconfirmed through consultation.”*
- “For the allocated sites set out in the Section 3.3, availability of the site has been confirmed and the timescales reflect our understanding of when the site will be brought forward in the plan period”.*
- 6.15 The SHLAA [Section 2.6] sets out a series of archetypes which have been used to determine the scale of potential development on sites less than 5ha (non-strategic sites). It notes that for Strategic Sites (over 5 ha) a bespoke approach is taken to reflect the site characteristics and detailed work undertaken.

Housing Supply

- 6.16 A summary of housing completions and permissions for the period April 2016 to March 2017 is provided.
- 6.17 The SHLAA identifies a windfall allowance of 169 dwellings per annum and states that windfalls will be included from year 4 of the trajectory. Included at Annex 5 of the SHLAA is City of York Local Plan Windfall Allowance Technical Paper (2017) which explains how the windfall figure has been derived.
- 6.18 The SHLAA does not provide any detailed calculation to demonstrate how a 5-year housing land

supply is achieved. This is wholly unacceptable and does not demonstrate the deliverable 5 year housing land supply as required by national guidance.

City of York Local Plan Publication Draft [LPP]

- 6.19 The Council published its LPP in February 2018 for public consultation. Policy H1 identifies the sites which have been allocated to meet the housing requirement set out in Policy SS1 over the plan period 2017/18 to 2032/33 (867dpa).
- 6.20 Table 5.1 in the LPP identifies the sites which have been allocated in the LPP and provides the estimated dwelling yield and estimated phasing for these sites (i.e. Short Term: Years 1-5, Medium Term: Years 1 -10 etc.). For those sites where the phasing extends beyond years 1-5, the anticipated delivery of the sites in each 5 year phase is not confirmed.
- 6.21 The LPP (Figure 5.1 and Table 5.2) provides housing trajectories for the period April 2017 to March 2033 (16 years) against the identified housing target of 867dpa. The LPP [5.6] states that the trajectory shows there is an adequate supply to meet the objectively assessed need throughout the plan period. However, there is a lack of detailed evidence on the supply to demonstrate this position.
- 6.22 Lichfields notes that the period March 2017 to April 2018 has been identified as Year '0', rather than Year '1', which would be the usual approach. Years 0 to 4 (rather than Years 1 to 5) is therefore the period against which the Framework requirement of achieving a 5-year supply would be assessed.
- 6.23 The information provided in the trajectories is high level. They do not provide an annual housing delivery trajectory for each site over the plan period. The Council simply provides an assumed total completion figure for all sites each year without detailed reasoning on the methodology for deriving this figure. In addition, there is a lack of evidence in the SHLAA on lead-in times and delivery rate assumptions for the Council's unimplemented permissions and draft allocations.
- 6.24 With regard to providing a rolling 5 year supply of deliverable sites the LPP [5.9] states:

"The Council accepts that there has been persistent under delivery of housing as defined in the NPPF and consequently has included enough land in the early years of the trajectory to ensure there is a 20% buffer in the 5 year supply. This land has been brought forward from later in the plan period. Progress on meeting delivery targets will be assessed through the authority monitoring report and the 20% buffer will be rolled forward within the 5 year supply until such time as the under delivery has been satisfactorily addressed. This does not mean that overall more land has been allocated in the plan, what it does mean is that the development trajectory (see Figure 5.1) ensures that in the early years of the plan additional land is available to address previous under delivery".

However, as with the SHLAA, the LPP does not provide any detailed calculation to demonstrate how the 5-year housing land supply is achieved.

- 6.25 With regard to site yield and delivery, the LPP [5.12] notes that the yield for each of the strategic sites has been established through working with site promoters to produce an individual assessment of the yield for each site. For non-strategic sites the LPP refers to the yield archetypes identified in the SHLAA [2.6.2].
- 6.26 With regard to the delivery and phasing of allocated sites the LPP [5.13-5.14] states:

"Each allocated site has been assessed for its likelihood of being delivered to ensure that we are satisfied that each site is likely to come forward for development during the plan period, although ultimately this can be dependent upon external factors such as finance

availability for house builders, mortgage availability for purchasers and the aspirations of landowners. In all cases there have been discussions with the land owner about their current plans. We have at this stage placed each allocated site within a timescale of short (1-5 years), medium (6-10 years), long term (11-15 years) or life time of the plan (1-21 years). The timescale of each site is an indication of when we think the site is likely to come forward and reflects the timescale put forward by the landowner or developer in the discussions referred to above, the requirement to develop the most sustainable sites within a settlement first and viability”.

“The phasing of sites is important for the successful delivery of the plan’s priorities and sites should only come forward in different phases if they would not prejudice the delivery of other allocated sites. For example where the construction of essential infrastructure is linked to the delivery of a package of sites, these sites will need to be brought forward in an orderly fashion to ensure the infrastructure is in place to mitigate the impacts of development”.

- 6.27 As with the SHLAA, there is a lack of evidence in the LPP on lead-in times and delivery rate assumptions for the Council’s unimplemented permissions and draft allocations. This is a flawed approach which does not meet the requirements of national guidance.

Conclusion

- 6.28 The Council has compiled and recently published housing completions figures for the past ten monitoring years as well as published detailed site by site completion figures for the past 5 years. However, the Council’s housing land supply figures do not provide an annual housing delivery trajectory for each site over the plan period. The Council simply provides an assumed total delivery figure for each site without detailed reasoning on the methodology for deriving this figure.
- 6.29 Insufficient information has also been provided on the assumptions used to derive the Council’s proposed delivery in the LPP and associated evidence base documents. There is a distinct lack of evidence on lead-in times and delivery rate assumptions for the Council’s unimplemented permissions and draft allocations.
- 6.30 Furthermore, the Council includes several student sites in its future supply, which is inappropriate, as there is no justification regarding how these developments will result in the release of housing into the general housing market as required by the Practice Guidance. In particular, no robust evidence has been provided to clearly demonstrate that there has been a reduction in the number of general market dwellings occupied by students as a direct result of the provision of purpose-built student accommodation. As a result, the Council’s land supply figures risk being severely distorted.

7.0 Housing Requirement

Introduction

- 7.1 The Framework⁶⁷ and Practice Guidance require LPAs to demonstrate a developable 5-year supply and a deliverable supply for the period 5-15 years. This requires an understanding of the relevant housing requirements for each of these time periods.
- 7.2 This Technical Report sets out a critique of the Council's OAHN and the need to increase the target to meet the needs of the local community. This section briefly sets out the relevant figures to be used for both the 5-year assessment and the plan period assessment.

Plan Period Housing Requirement

- 7.3 The Council's SHMA Assessment Update seeks to provide the evidence to justify the housing requirement for the City of York Local Plan. It sets the Plan period as 2012-2032.
- 7.4 This Technical Report sets out the flaws in the SHMA Assessment Update and the Council's approach in rejecting the 953 dpa figure recommended in the SHMA Assessment Update. It requests that the OAHN is recalculated using an appropriate methodology. Lichfields considers that the Council's SHMA makes a number of flawed assumptions and judgements and does not properly respond to the requirements of policy and guidance. As a result, the proposed OAHN set out in the SHMA is not robust and is inadequate in meeting the need and demand for housing.
- 7.5 Even so, the Council has resolved to reject the OAHN of 953 dpa set out in the SHMA update and adopt a figure of 867 dpa, based on the latest revised SNHP published by ONS and MHCLG with no adjustment for market signals or affordable housing. By way of contrast, MHCLG's standard methodology produces an OAHN figure of 1,070 dpa, significantly higher than adopted by the Council which again demonstrates the inappropriateness of the Council's approach.
- 7.6 As noted in Section 4, Lichfields considers that the OAHN for York is **at least 1,150 dpa**. To be robust however, for the purposes of this report, we have also used GL Hearn's 953 dpa OAHN figure to calculate the City's 5YHLS.

5-Year Housing Requirement

Annual Requirement

- 7.7 When calculating the 5-Year Housing Requirement the annual average requirement should be used. As there is disagreement over the appropriate OAHN with the Council preferring a housing requirement of 867 dpa rather than their own housing evidence which suggests a need for 953 dpa figure in the SHMA Update, with Lichfields recommending a yet higher figure (1,150 dpa). All three are used in this assessment.
- 7.8 We would note that whichever figure is used, it does not include the specific needs of students living in halls of residence, which would be additional as these are explicitly excluded from the CLG's household projections.

⁶⁷ Framework - §47

Under Supply

- 7.9 The Practice Guidance⁶⁸ indicates that LPAs should aim to deal with any under supply within the first 5-years of the plan period where possible. Table 7.1 sets out the net completions recorded by the Council since 1st April 2007 compared to the now withdrawn RS for Yorkshire and the Humber requirement which the Council has been using in the absence of an adopted Local Plan. Table 7.1 shows the failure of York to deliver housing to meet the needs of the community.

Table 7.1 Housing Completions 2007/08 - 2016/17

Year	Target	Comp.	+/-	Cum +/-
2007/08	650	523	-127	-127
2008/09	850	451	-399	-526
2009/10	850	507	-343	-869
2010/11	850	514	-336	-1,205
2011/12	850	321	-529	-1,734
2012/13	850	482	-368	-2,102
2013/14	850	345	-505	-2,607
2014/15	850	507	-343	-2,950
2015/16	850	1,121	+271	-2,679
2016/17	850	977	+127	-2,552
Totals	8,300	5,748	-2,552	

Source: York Housing Monitor Update for Monitoring Year 2016/17

- 7.10 The Council has produced a Half-Year Monitoring Update for 2017/18 (1st April 2017 to 30th September 2017). This indicates that net completions over this period have totalled 1,036 dwellings.
- 7.11 However, as details of the full monitoring year 2017/18 are not yet available it is not possible to include this latest dataset in the analysis.
- 7.12 Table 7.2 sets out the net completions recorded by the Council since 1st April 2012 compared to the Council's requirement and the Lichfield's target. In this context it should be noted that the Lichfield completions exclude the student accommodation (180 units) previously included in the Council's delivery figures for the reasons set out in Section 6.0. The table shows the failure of York to deliver sufficient housing to meet the emerging OAHN.

⁶⁸ Practice Guidance - ID:3-035-20140306

Table 7.2 Housing Completions

Year	Council Position				SHMA OAHN				Lichfield Position			
	Target	Comp.	+/-	Cum +/-	Target	Comp.	+/-	Cum +/-	Target	Comp.	+/-	Cum +/-
2012/13	867	482	-385	-385	953	482	-471	-471	1,150	385	-765	-765
2013/14	867	345	-522	-907	953	345	-608	-1,079	1,150	345	-805	-1,570
2014/15	867	507	-360	-1,267	953	507	-446	-1,525	1,150	507	-643	-2,213
2015/16	867	1,121	+254	-1,013	953	1,121	168	-1,357	1,150	1,121	-29	-2,242
2016/17	867	977	+110	-903	953	977	24	-1,333	1,150	894	-256	-2,498
Totals	4,335	3,432	-903		4,765	3,432	-1,333		5,750	3,252	-2,498	

Source: York Housing Monitoring Update for the Year 2016/17 / Lichfields analysis

Application of the Buffer

- 7.13 Judgements on the appropriate Framework buffer (i.e. 5% or 20%) to apply turns on whether there is a record of “*persistent under delivery*”.
- 7.14 In this case, the Council has under-delivered in 8 of the past ten years when compared to the previous housing target and the emerging Local Plan (see Tables 7.1 & 7.2). A ten year period is considered to represent an entire economic cycle and an appropriate period for considering past delivery. This results in a substantial shortfall which needs to be quickly rectified. It is therefore appropriate to apply a 20% buffer to help address the significant delivery failings. This approach aligns with the Framework⁶⁹ objective to “*boost significantly*” the supply of housing and ensure that objectively assessed housing needs are met.
- 7.15 In respect of applying the buffer, it should be applied to both the forward requirement and the under supply. This approach accords with the Framework, which suggests that the buffer should be added to the total requirement which would, inevitably, include any under delivery from earlier years. In this regard, the purpose of the buffer is to increase the supply of land; it does not change the number of houses required to be built within that period. Put simply, the buffer is not, and it does not become, part of the requirement; it is purely a given excess of land over the land supply necessary to permit the identified need for housing to be delivered.
- 7.16 There have been a number of appeal decisions supporting this approach. In particular, the appeal in Droitwich Spa⁷⁰ where the Inspector indicated that the buffer should be applied to the forward requirement and under supply. He stated:
- “It is also clear that the 20% buffer should be applied to the entire 5-year requirement (including the historic shortfall). The Council could not point to any provision in policy or previous decisions which supports the contention that the 20% should not apply to the historic shortfall...”* [§8.46]
- The Secretary of State supported this approach in his decision letter.⁷¹
- 7.17 Table 7.3 sets out respective positions in relation to the 5-year requirement.

⁶⁹ Framework - §47

⁷⁰ Land at Newland Road and Primsland Way, Droitwich Spa (SoS Decision 02.07.14 – Ref: APP/H1840/A/13/2199085)

⁷¹ *ibid* – DL §14

Table 7.3 5-Year Housing Requirement

	Council		SHMA OAHN		Lichfields	
	Calc.	Total	Calc.	Total	Calc.	Total
Policy Requirement (2017-2022)	867 dpa x 5	4,335	953 dpa x 5	4,765	1,150 dpa x 5	5,750
Under Supply (2012-2017)	4,335 – 3,432	903	4,765 – 3,432	1,333	5,750 – 3,252	2,498
Buffer at 20%	$(4,335 + 903) \times 0.2$	1,048	$(4,765 + 1,333) \times 0.2$	1,220	$(5,750 + 2,498) \times 0.2$	1,650
Total Requirement		6,286		7,318		9,898
Annual Requirement	6,286 / 5	1,257	7,318 / 5	1,464	9,898 / 5	1,980

Source: Lichfields

7.18 On this basis, the 5-year requirement ranges from **6,286** to **9,898** dwellings.

Conclusion

- 7.19 The SHMA Update sets out an OAHN for York of 953 dpa; however, the Council has ignored this figure and adopted 867dpa for the plan period. Lichfields considers that an OAHN of 1,150 dpa is more appropriate. Even this figure explicitly excludes the needs of students living in purpose-built halls of residence.
- 7.20 The appropriate plan period is for this assessment is 2012-2032. We have set out the Council's past completion data and consider that a 20% buffer is required due to the persistent under delivery of housing in the City over the past 10 years.
- 7.21 When using the Council's OAHN and factoring in backlog and an appropriate buffer it is concluded that the annual housing requirement over the next 5-years is 6,286 (1,257 dpa), rising to 7,318 (1,464 dpa) using the SHMA's OAHN. Using Lichfields' OAHN figure would result in an annual requirement of 9,898 (1,980 dpa) over the next 5-years.

8.0 Housing Land Supply

Introduction

8.1 This section assesses the adequacy of the deliverable and developable supply of housing sites to meet the requirement for the plan period and 5-year period. It draws on the information supplied by the Council in the LPP and associated evidence base.

8.2 Before considering the individual components of the supply some initial points on the assumptions made by the Council on deliverability, particularly in relation to lead-in times and delivery rates. In this context it is important to be cautious in relation to the likelihood of sites delivering and the scale of that delivery. This is because the purpose of the assessment is to provide a realistic view of whether there is sufficient land available to meet the community's need for housing. If those needs are to be met a cautious approach must be taken.

Delivery Assumptions

Lead in Times

8.3 From the information released to date by York City Council it is impossible to decipher the Council's assumed lead in times for the proposed housing allocations outlined in the LPP.

8.4 Whilst housebuilders aim to proceed with development on site as quickly as possible, lead-in times should not underestimate inherent delays in the planning process (e.g. the approval of reserved matter and discharge of planning conditions) as well as the time taken to implement development (e.g. complete land purchase, prepare detailed design for infrastructure, mobilise the statutory utilities and commence development).

8.5 Another fundamental element in calculating appropriate lead-in times is the size and scale of the site. As a generality, smaller sites can commence the delivery of units before larger sites. Larger sites often have more complex issues that need to be addressed and require significantly greater infrastructure development which must be delivered in advance of the completion of units.

8.6 Table 8.1 sets out our general methodology in terms of lead-in times. We have split the methodology by site size and stage in the planning process.

Table 8.1 Lead-in Times

Stage of Planning	0-250 units	250-500 units	500+ units
Full Planning Permission	1 Year	1.5 Years	2 Years
Outline Planning Permission	1.5 Years	2 Years	2.5 Years
Application Pending Determination	2.5 Years	3 Years	3.5 Years
No Planning Application	3 Years	3.5 Years	4 Years

Source: Lichfields

8.7 We provide a detailed breakdown in Table 8.2 to Table 8.5 of the lead-in times and the factors that have been taken into account. The tables, breakdown the lead in times for a typical site of up to 250 units. Obviously, the larger site categories would take long to come forward as given the additional complexities in relation to negotiate S.106 contributions, discharge conditions

and put in place the necessary on-site infrastructure.

- 8.8 We have incorporated a period between the grant of outline planning permission and the formulation of the scheme to allow for market assessments and board approvals. Finally, if the outline permission has been secured by a land promoter or a landowner the site would need to be marketed during this period. This period has not been included but would add between 6 months to 9 months to the delivery.
- 8.9 On the sites with no current planning application, the timetable assumes there is a willing developer/landowner who wishes to commence the preparation of an application immediately. However, this is not always the case and a draft allocation in a Local Plan does not necessarily mean the process of securing planning permission is commenced immediately.

Table 8.2 Full Planning Permission - Lead-in Times (Site up to 250 units)

Key Stages	Prep of App.	Consider App.	S.106	Site Prep.	First Comp.	Total
Full Permission						
Discharge of Pre-Commencement Conditions	3	2				5
Site Commencement				3	6	9
Overall Time to 1st Completion						14*

Source: Lichfields

Notes: * rounded down to 12 months for the purposes of calculating a delivery trajectory.

Not included time within the timetable for market assessment and board approval as it is assumed this has been completed

Table 8.3 Outline Planning Permission - lead-in Times (Site up to 250 units)

Key Stages	Prep of App.	Consider App.	S.106	Site Prep.	First Comp.	Total
Outline Permission						
Reserved Matters and Discharge of Pre-Commencement Conditions	6	4				10
Site Commencement				3	6	9
Overall Time to 1st Completion						19*

Source: Lichfields

Notes: * rounded down to 12 months for the purposes of calculating a delivery trajectory.

Not included time within the timetable for market assessment and board approval as it is assumed this has been completed

Table 8.4 Application Pending Outline Permission - Lead-in Times (Site up to 250 units)

Key Stages	Prep. of App.	Consider App.	S.106	Site Prep.	First Comp.	Total
Outline Application		4	3			7
Market Assessment						3
& Board Approval	6	4				10
Reserved Matters and/or Discharge of Pre-Commencement Conditions				3	6	9
Overall Time to 1st Completion						29*

Source: Lichfields

Notes: * rounded to 30 months for the purposes of calculating a delivery trajectory.

Table 8.5 No Planning Application - Lead-in Times (site up to 250 units)

Key Stages	Prep of App.	Consider App.	S.106	Site Prep.	First Comp.	Total
Application	6	4	3			13
Market Assessment						
& Board Approval						3
Reserved Matters and/or Discharge of Pre-Commencement Conditions	6	4				10
Site Commencement				3	6	9
Overall Time to 1st Completion						35*

Source: Lichfields

Notes: * rounded to 36 months for the purposes of calculating a delivery trajectory.

- 8.10 The lead-in times set out in these tables are likely to be an underestimate based on the recent report by Barratt Homes and Chamberlin Walker.⁷² The report notes that:

“New data for 2017 presented in this report, from Barbour ABI, indicates that ‘post-planning permission’ development timescales (C+D) have increased markedly: on sites of 20 homes or more it now takes at least 4.0 years on average from the grant of detailed planning permission to site completion, compared to the earlier LGA estimates of 1.7 to 3.2 years.”

In these circumstances the Council must set out clearly the lead-in times that are assumed and demonstrate that they are sound and robust. This is clearly not the case with the current evidence base.

Delivery Rates

- 8.11 Whilst housebuilders aim to deliver development on site as quickly as possible, in a similar fashion to the lead-in times outlined above, the annual delivery rate on sites will depend on a number of factors including overall site capacity. In our experience, sites with a capacity of less than 250 units are built out by one housebuilder using one outlet. As such, a reasonable average

⁷² The Role of Land Pipelines in the UK Housebuilding Process (September 2017) Barratt Homes & Chamberlin Walker

annual delivery rate in York is 40 dpa for sites with a capacity of less than 250 units. However, on sites of less than 100 units we have assumed a lower delivery rate of 25 dpa as these sites will generally be delivered by smaller housebuilders.

- 8.12 Generally, in York on sites with a capacity of between 250 units and 500 units there is often a second developer (or national housebuilders use a second outlet) delivering units simultaneously. As such, annual delivery rates increase but not exponentially to the number of housebuilders or delivery outlets. In our experience in the current market, sites with 2 outlets deliver approximately 65 dpa.
- 8.13 Finally, on large-scale sites with a capacity of more than 500 units, there are often up to three housebuilders or outlets operating simultaneously. As before, this does not increase delivery exponentially but it can be expected that three outlets operating simultaneously on a large scale would deliver approximately 90 dpa.

Table 8.6 Annual Delivery Rates

	0-100 units	100-250 units	250-500 units	500+ units
Annual Delivery	25 dpa	40 dpa	65 dpa	90 dpa

Source: Lichfields

- 8.14 Lichfields considers that it would be appropriate to apply the delivery rates identified above. The quantum of delivery of units on a site can be affected by a significant number of factors including local market conditions, general economic conditions, proximity to competing site, housing market area, type and quality of unit and the size of the development. There will be a number of sites in York that will experience higher annual delivery rather than the averages outlined above but there will also be a number of who deliver below the average also. It is therefore important not to adopt an average delivery rate which may only be achieved by a small minority of the strategic sites.

Density Assumptions

- 8.15 The 2017 SHLAA (page 20) sets out the density assumptions for each residential archetype.
- 8.16 It is considered that, the proposed densities are overly ambitious and will not be achieved on average on sites throughout York. For example, from our experience, it is not anticipated an average density of 50dph on sites of 1ha+ with a gross to net ratio of 95% can be achieved. Meeting open space requirements alone will preclude this ratio. There will be a very limited number of examples where this density has been achieved but a more appropriate and conservative figure should be pursued in the absence of firm details from a developer. The gross to net ratio at most should be 85%, although this can reduce to less than 60% for larger developments with significant infrastructure requirements.
- 8.17 Secondly, it is considered that a density of 40dph on suburban sites is highly aspirational and is unlikely to be achieved across a significant number of sites. This density is characterised by housing for the smaller households and thus not suitable for family accommodation. Our housebuilder clients and local intelligence has reaffirmed our concerns with the proposed average densities. Unless there is specific evidence to the contrary the default density on suburban sites should be 35 dph.
- 8.18 The Council has not provided sufficient information to back up their assumptions and we consider that these development densities should be revised downwards to ensure that the capacity of sites is not artificially inflated. Assumptions on development densities in the

absence of specific developer information should air on the side of caution and we consider that the details in the 2017 SHLAA are at variance with this principle.

Components of the Housing Supply

- 8.19 The components of the Council's supply are set out in the LPP. The LPP does not set out a delivery trajectory for each site and only sets out the expected delivery from each site over the plan period.
- 8.20 The information provided in the trajectory in the LPP is high level. It does not provide an annual housing delivery trajectory for each site over the plan period. The Council simply provides an assumed total completion figure for all sites each year without detailed reasoning on the methodology for deriving this figure.
- 8.21 As set out above, the Council includes several student sites in its future supply which is inappropriate as no robust evidence has been provided to demonstrate that there has been a reduction in the number of general market dwellings occupied by students as a direct result of the provision of purpose-built student accommodation. As a result, including student accommodation in the supply is flawed and risks severely distorting the figures.

Sites with Planning Permission

- 8.22 It is now a standard approach that sites with planning permission should be included in the supply (unless there is a good reason to exclude them) whereas sites without planning permission should be excluded (unless there is a good reason to include them). This interpretation is entirely logical as the absence of a planning permission is a clear impediment to development, which is contrary to the test that land should be available now.
- 8.23 The LPP [§5.3] indicates that, as at 11th April 2017, there were extant planning permissions for 3,578 homes which will contribute towards meeting the overall housing requirement in the Plan. However, the Council has not identified these sites nor has it provided a delivery trajectory for each site to demonstrate how each of these sites contributes to delivery over the Plan period or to the 5-Year housing land supply. In the absence of this information it is not possible to ascertain whether these sites should be included in the supply. Lichfields therefore reserves the right to provide further comment on this matter as and when more detailed information is made available.

Allocations

- 8.24 Table 5.1 of the LPP identifies the housing and strategic sites which are proposed for allocation. It provides an estimated dwelling yield and estimated phasing for these sites (i.e. Short Term: Years 1-5, Medium Term: Years 1 -10 etc.). For those sites where the phasing extends beyond years 1-5, the anticipated delivery of the sites in each 5 year phase is not confirmed.
- 8.25 The Council has not provided a detailed delivery trajectory for each of the Potential Strategic Housing Allocations and Potential General Housing Allocations. The Council has simply provided a figure for the total dwellings to be provided for the plan period without any justification or clarification on the assumptions used to derive the delivery figure. Lichfields therefore reserves the right to provide further comment on this matter as and when more detailed information is made available.
- 8.26 The estimated phasing in LPP Table 5.1 indicates that a number of large strategic sites are to commence delivery in Year 1. With regard to this matter, Lichfields would like to express a degree of caution in relation to resourcing issues at the Council. The Council are assuming that a significant number of large planning applications will be submitted and determined concurrently in a relatively short space of time. It is not clear if the Council has fully considered

the resourcing issues associated with dealing with all these application at the same time. In our experience, the Council's Department may not have sufficient capacity to deal with a number of major applications at the same time.

- 8.27 Based on the information provided, Lichfields also consider there are a number of sites where the delivery of development has been substantially overestimated by the Council, including the examples below.

Sites ST14 Land to West of Wigginton Road & ST15 Land to West of Elvington Lane

- 8.28 The estimated phasing in LPP Table 5.1 indicates that sites ST14 (Land to West of Wigginton Road) and ST15 (Land to West of Elvington Lane) will begin to deliver in Year 1 (2018/19). Lichfields consider this anticipated early delivery to be unrealistic for a number of reasons:
- 1 The sites are located within the Green Belt and no application is likely to be permitted until the Local Plan is adopted.
 - 2 A clear strategy is needed to deliver the sites during the plan period. Both are in multiple ownerships and the siting of each allocation without access to a public highway introduces an added level of complexity in negotiation and agreement between the parties involved.
 - 3 In view of their size and complexity much work will be needed to develop masterplans and establish viability of the developments to be progressed through the planning system.
 - 4 Detailed masterplans will be required to secure an appropriate form of development and ensure a phased delivery of the on-site services and facilities.
 - 5 Given the scale and location of the developments the schemes will need to be subject to full environmental assessment, especially to consider the likely impact on landscape, ecology and transportation and historic character of the City.
 - 6 The sites are isolated and there is no existing infrastructure capable of accommodating the proposed level of development. Both sites do not have frontage to a public highway with capacity that would allow even the smallest amount of development to commence. Their development will require major off-site highway improvements and new highway access roads and junctions. Other utilities will need to be procured and delivered in advance of any construction works on the site. This will inhibit the early delivery of the developments.
 - 7 The proposed sites are not obviously sustainable in that they are not easily accessible to existing social and community facilities or located close to existing public transport routes. Considerable effort will need to be made to ensure the allocations do not become satellite, dormitory communities wholly reliant on private transport for every journey away from the home.
- 8.29 The proposed delivery of units in Year 1 (2018/19) is ambitious and unrealistic given the extensive infrastructure requirements which will need to be put in place in advance of any development taking place. In addition, in view of the application of restrictive Green Belt policy it is inevitable that once the Local Plan is adopted the City of York Council will receive many planning applications for both large and smaller developments. Processing these applications will inevitably cause added delay, especially to the major, complex, housing allocations.
- 8.30 We consider that the identification of a portfolio of small site allocations (e.g. up to 250 dwellings) would assist in meeting any shortfall created by the delay in large sites delivering dwellings early in the plan period.

Windfalls

- 8.31 The Council claims that 169dpa will be delivered on windfall sites from Year 3 of the trajectory (2020/21) and provides justification for their windfall allowance in its Windfall Allowance Technical Paper (2017).

- 8.32 The Framework⁷³ sets out the local planning authorities may make allowance for windfall sites in the 5-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Furthermore, any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends.
- 8.33 Lichfields accept that windfalls should be included in the overall housing delivery trajectory but only consider that they are appropriate outwith the first 5-year period. The inclusion of a significant windfall figure in earlier years increases the likelihood of artificially inflating the housing delivery figures in year 3 and double counting sites with permission. It does not account for any potential delays to the build out sites with extant consent. As such, the windfall allowance should be amended to only make an allowance from Year 5 (2022/23) onwards.
- 8.34 The Council consider that an annual windfall of 169dpa is appropriate to take account of potential delivery on sites of <0.2ha and completions on change of use and conversion sites.
- 8.35 However, the figure of 169 dwellings has only been achieved four times over the past 10 years and only twice since the base date of the new plan period (2012). This is during a period when the application of a very tight inner Green Belt boundary has precluded urban edge development at a time of ever increasing housing demand. In such circumstances it would have been an ideal period for windfall development to increase; but it did not. There is therefore no justification for such a high allowance.
- 8.36 In relation to the delivery on sites of <0.2ha, Lichfields consider that the proposed windfall allowance is too high because tightly defined settlement boundaries in York and surrounding settlements means there is a finite supply of sites which can come forward. This supply has been curtailed by the change in definition of previously developed land (June 2010) to remove garden sites. In addition, the Council started to request small sites to make contributions towards affordable housing provision and required rural sites with a capacity of more than 15 units to provide on-site affordable housing. This has made the provision of units on small sites less attractive to the market. Since the policy change and the introduction of affordable housing contributions the quantum of completions on windfall sites in York has plummeted. As a consequence, the future supply from this source should only consider the average completion rate since 2009/10 of 33dpa.
- 8.37 In relation to the delivery from conversions, the average completion figure in the past three years is largely dependent on recent changes to permitted development rights. As a consequence, it is considered that after an initial surge the conversion rate will revert back to the long term average. It is likely that the optimum conversion sites will be completed in the short term and the less sustainable and attractive office developments in York will not be converted. As such the average conversion rate from 2007/08 to 2013/14 of 64dpa should be used.
- 8.38 Based on the above assessment it is considered that the proposed windfall allowance should be reduced from 169dpa to 100dpa (rounded up from 97) which represents a far more realistic windfall allowance over the plan period. The incorporation of this figure would ensure that the Council's trajectory is not artificially inflated, can be realistically achieved and would only be incorporated into the delivery trajectory at Year 5 (2022/23) to ensure no double counting.
- 8.39 It is considered that the Council's information does not adequately justify a windfall allowance of 169dpa and does not provide sufficient certainty that this figure will be achieved over the plan period. We reserve the right to revise our position on windfalls if the Council prepares and releases further justification.

⁷³ The Framework, §48

Conclusion

- 8.40 Lichfields has undertaken an analysis of the Council's evidence base documents and consider that the evidence provided by the Council is not sufficient to demonstrate that the dwelling requirement over the plan period and a 5-Year supply will be achieved. It is also considered that some of the proposed delivery rates on sites are unfounded and unrealistic.

9.0 **Balance of the Requirement and Supply**

Introduction

9.1 The Council has not produced a trajectory or a detailed assessment of the 5-year supply position, as required by the Framework. In these circumstances, it can only be assumed that the Council considers that it can demonstrate an adequate housing supply in the initial 5-year period and over the plan period. However, no evidence has been produced to demonstrate this position.

9.2 As a consequence, this section sets out an assessment of the housing supply against the three OAHNs for York (set out in Section 4).

5-Year Supply

Adequacy of Supply

9.3 The five year supply has been assessed against the Council's LPP housing target of 867 dpa; the SHMA Update's OAHN of 953 dpa; and Lichfields OAHN (1,150 dpa). The requirement is then compared to the Council's supply figures. The assessments in both cases make provision for the backlog and 20% buffer for persistent under delivery as calculated in Section 7. The calculation of Lichfields' position excludes any windfall allowance for the reasons we have set out in this Technical Report. As the Council has not provided adequate evidence to show how committed, allocated sites, student housing etc. factor into the housing supply, it has not been possible to fully assess the supply position and make further amendments. However, on the basis of our comments above, it is likely that this would reduce the housing supply considerably. Table 9.1 sets out the relative positions.

Table 9.1 5-Year Housing Land Supply Position using the Council's and Lichfields' OAHNs

Housing Requirement (2017-2022)		York Assumed Position		SHMA OAHN		Lichfields' Position	
Local Plan OAHN (dpa)			867		953		1,150
5 Year Requirement	2017-2022		4,335		4,765		5,750
Backlog	2012-2017	903		1,333		2,498	
Framework Buffer	20%	1,048		1,220		1,650	
Sub Total		1,951	1,951	2,553	2,553	4,148	4,148
5-year Requirement	2017-2022		6,286		7,318		9,898
Annual 5-year requirement			1,257		1,464		1,980
Housing Supply (2017-2022)							
Projected Housing Completions including Windfall Allowance from Year 3 (windfall allowance excluded from Lichfields' Position)			5,902		5,902		5,769
Total Supply	2017-22		5,902		5,902		5,769
Difference (Undersupply expressed as a minus)			-384		-1,416		-4,129
5-Year Supply Expressed as Years of Residual Annual Requirement			4.70		4.03		2.91

Source: Lichfields Analysis

- 9.4 The table demonstrates that even when comparing the likely delivery within the 5-year period to the Council's OAHN, there is not an adequate supply of housing land. Based on the Council's approach, there is only a supply of 4.70 years (with an undersupply of 384 dwellings), falling to 4.03 years if the higher SHMA OAHN is applied. If the Lichfields OAHN is used there is a supply of 2.91 years and a shortfall of 4,129 dwellings.
- 9.5 In addition, for the reasons we have raised in the previous section, the Council's 5-year supply figure of 5,902 dwellings is considered to be optimistic and all of this supply is unlikely to come forward over the 5-year period, which would further exacerbate the supply shortfall. Furthermore, including student accommodation in the supply without clearly evidencing how this would release housing onto the market elsewhere is not in accordance with the Practice Guidance or recent High Court judgements, and risks severely distorting the Council's land supply figures as a consequence.

Implications of the 5-Year Supply Position

- 9.6 The Council has a significant shortage of housing land in the first 5-years. This is a significant issue for the Council which means the plan is not 'sound' in its current form. It is therefore imperative that additional sites are allocated for housing to tackle this issue. These should be sites without any immediate constraints that can be delivered quickly once the plan is adopted.

The Plan Period Supply

- 9.7 There is also a significant shortfall of housing over the Plan period, when assessed against the Lichfields OAHN of 1,150 dpa and the 2,498 dwelling shortfall in delivery for the period 2012 to 2017 identified in Table 7.2 (a total figure of 20,898 dwellings over the Plan period 2012 to 2033). LPP Table 5.2 indicates a supply of 18,839 dwellings which is equivalent to a shortfall of 2,059 dwellings over this period.

Conclusion

- 9.8 The Council has not produced a trajectory or a detailed assessment of the 5-year supply position as required by the Framework. No evidence has therefore been produced to demonstrate the Council's housing supply position.
- 9.9 The assessment of the balance between the housing requirement and supply demonstrates that there is a significant shortfall for 5-year period. For the plan period, there is also a significant shortfall when assessed against the Lichfields assessment of the OAHN.
- 9.10 In these circumstances, the emerging plan is not 'sound' as required by the Framework, as the Council has not demonstrated an adequate short and longer-term supply as required by national guidance.
- 9.11 The Council should allocate additional land to meet the housing needs of the community and these sites should be able to deliver early in the plan period. This is the only approach that will deliver a 'sound' plan and enable the much needed investment in new housing to meet the community's needs.
- 9.12 It should be noted that the above assessment is reliant upon the information provided in the LPP and associated evidence base documents. Lichfields therefore reserves the right to update the above evidence as and when further information becomes available, particularly regarding student housing needs.

10.0 Summary

Context

- 10.1 The Framework sets out that LPAs should use their evidence base to ensure they meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework.
- 10.2 The SHMA Assessment Update makes a number of assumptions and judgements which Lichfields considers to be flawed, or which do not properly respond to the requirements of policy and guidance. As a result, the concluded OAHN is not robust and is inadequate to meet need and demand within the HMA.

Conclusions on the City of York's Housing Need

- 10.3 The Council's approach to identifying an assessed need of 867 dpa in the introductory section of the SHMA Assessment Update is considered to be fundamentally flawed. This is effectively a 'policy-on' intervention by the Council which should not be applied to the OAHN. It has been confirmed in the Courts that FOAN is 'policy off' and does not take into account supply pressures. The Council's approach to identifying the OAHN, as set out in the SHMA Assessment Update, would therefore be susceptible to legal challenge. The calculation of OAHN should therefore be based on the normal 'policy-off' methodology.
- 10.4 There are a number of significant deficiencies in the SHMA Assessment Update which means that the 953 dpa OAHN figure identified in the Assessment Update is not soundly based. In particular:
- 1 GL Hearn clearly accepts that an increase in household formation rates is necessary to respond to continued suppression of household formation rates within younger age groups within the official projections. However this demographic-led figure of 871 dpa does not appear to have been carried forward by GL Hearn in calculating the resultant housing need, as noted below. Lichfields agree with making an adjustment for demographic and household formation rates. However, it would be illogical to revert back to unadjusted projections of 867 dpa and then take this to apply the adjustment for market signals and affordable housing, when a demographic need of 871 dpa has been identified.
 - 2 Overall, the Assessment Update fails to distinguish between the affordable housing needs of the City of York and the supply increase needed to address market signals to help address demand. Instead the SHMA blends the two elements within the same figure resulting in a conflated figure which is lower than the level of uplift deemed reasonable by the Eastleigh and Canterbury Inspectors, despite the fact that market signals pressures in York indicate signs of considerable stress and unaffordability. The Practice Guidance is clear that the worse affordability issues, the larger the additional supply response should be to help address these.
 - 3 Given the significantly worsening market signals identified in City of York, Lichfields consider that a 20% uplift would be appropriate in this instance and should be applied to the OAHN, plus a further 10% uplift to help address affordable housing needs.
- 10.5 The scale of objectively assessed need is a judgement and the different scenarios and outcomes set out within this report provide alternative levels of housing growth for the City of York. Lichfields considers these to be as follows:
- 1 **Demographic Baseline:** The 2014-based household projections indicate a net household growth of 867dpa between 2014 and 2024 (including a suitable allowance for vacant/second homes. Once a suitable adjustment has been made to rebase the projections to the (slightly lower) 2015 MYE, and through the application of accelerated headship rates

amongst younger age cohorts takes the demographic starting point to 871dpa.

- 2 **Market Signals Adjustment:** GL Hearn's uplift is 10%. However, for the reasons set out above, Lichfields considers that a greater uplift of 20% would be more appropriate in this instance. When applied to the 871dpa re-based demographic starting point, this would indicate a need for 1,045dpa.

The demographic-based projections would support a reasonable level of employment growth at levels above that forecast by Experian, past trends or the Blended job growth approach. As such, no upward adjustment is required to the demographic-based housing need figures to ensure that the needs of the local economy can be met;

- 3 The scale of **affordable housing needs**, when considered as a proportion of market housing delivery, implies higher levels of need over and above the 1,045dpa set out above. It is considered that to meet affordable housing needs in full (573dpa), the OAHN range should be adjusted to 1,910dpa @30% of overall delivery. It is, however, recognised that this level of delivery is likely to be unachievable for York. Given the significant affordable housing need identified in City of York Lichfields consider that a further 10% uplift would be appropriate in this instance and should be applied to the OAHN, resulting in a final figure of **1,150 dpa**.

This is 7.5% higher than the MHCLG proposed standardised methodology figure of 1,070 dpa.

- 10.6 This allows for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth. Using this range would ensure compliance with the Framework [§47] by significantly boosting the supply of housing. It would also reflect the Framework [§19], which seeks to ensure the planning system does everything it can to support sustainable development. We would note that these figures do not include the need for specialised student accommodation, which would be additional.

Conclusions on Housing Land Supply

- 10.7 The Council has not produced a trajectory or a detailed assessment of the 5-year supply position as required by the Framework. No evidence has therefore been produced to demonstrate the Council's housing supply position.
- 10.8 Furthermore, including student accommodation in the supply without clearly evidencing how this would release housing onto the market elsewhere does not accord with the Practice Guidance or recent High Court judgements, and risks severely distorting the Council's land supply figures as a consequence
- 10.9 The assessment of the balance between the housing requirement and supply demonstrates that there is a significant shortfall for the 5-year period. For the plan period, there is also a significant shortfall when assessed against the Lichfields assessment of the OAHN. Based on the Council's approach, there is only a supply of 4.70 years (with an undersupply of 384 dwellings), falling to 4.03 years if the higher SHMA OAHN is applied. If the Lichfields OAHN is used there is a supply of 2.91 years and a shortfall of 4,129 dwellings.
- 10.10 In these circumstances, the emerging plan is not 'sound' as required by the Framework, as the Council has not demonstrated an adequate short and longer-term supply as required by national guidance.
- 10.11 The Council should allocate additional land to meet the housing needs of the community and these sites should be able to deliver early in the plan period. This is the only approach that will deliver a 'sound' plan and enable the much needed investment in new housing to meet the community's needs.

10.12 It should be noted that the above assessment is reliant upon the information provided in the LPP and associated evidence base documents. Lichfields therefore reserves that right to update the above evidence as and when further information becomes available.

Appendix 1: Lichfields Market Signals Assessment

Appendix 1

Our ref 50642/03/MW/CR

Date 19th March 2018

Subject **Lichfields Market Signals Assessment**

1.0 Market Signals

Introduction

- 1.1 The Framework sets out the central land-use planning principles that should underpin both plan-making and decision-taking. It outlines twelve core principles of planning that should be taken account of, including the role of market signals in effectively informing planning decisions:

“Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.” [§17]

- 1.2 The Practice Guidance requires market signals to be assessed against comparator locations . The analysis in the following sections focuses on comparing the City of York and other Local Authorities and England to benchmark their performance against trends both across the wider region and nationally.

- 1.3 The Guidance sets out six key market signals¹:

- 1 land prices;
- 2 house prices;
- 3 rents;
- 4 affordability;
- 5 rate of development; and,
- 6 overcrowding.

- 1.4 It goes on to indicate that appropriate comparison of these should be made with upward adjustment made where such market signals indicate an imbalance in supply and demand, and the need to increase housing supply to meet demand and tackle affordability issues:

“This includes comparison with longer term trends (both in absolute levels and rates of change) in the housing market area; similar demographic and economic areas; and nationally. Divergence under any of these circumstances will require upwards adjustment to planned housing numbers compared to ones based solely on household projections”.

“In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable. The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in

¹ 2a-019-20140306

affordability needed and, therefore, the larger the additional supply response should be.”²

- 1.5 The Practice Guidance sets out a clear and logical ‘test’ for the circumstances in which objectively assessed needs (including meeting housing demand) will be in excess of demographic-led projections. In the context of the Framework and the Practice Guidance, the housing market signals have been reviewed to assess the extent to which they indicate a supply and demand imbalance in the City of York and other comparable local authorities and therefore indicate that an upwards adjustment should be made over the demographic-led baseline already identified.

Housing Market Indicators

- 1.6 In the context of The Framework and the Practice Guidance, each of the housing market signals have been reviewed to assess the extent to which they indicate an imbalance between supply and demand in the City of York.

Land Prices

- 1.7 CLG has published a document entitled ‘*Land value estimates for policy appraisal*’ (February 2015) which contains post permission residential land value estimates, per hectare for each Local Authority. For York this figure is £2,469,000 per hectare, well above the equivalent figure for England (excluding London) of £1,958,000.

House Prices

- 1.8 The Practice Guidance³ identifies that longer term changes in house prices may indicate an imbalance between the demand for and supply of housing. Although it suggests using mix-adjusted prices and/or House Price Indices, these are not available at local authority level on a consistent basis, and therefore for considering market signals in York, price paid data is the most reasonable indicator.
- 1.9 Land Registry price paid data displays the median prices in York, alongside North Yorkshire and England as of 2016 (Table 1.1). These median prices illustrate lower prices in York compared to national rates, but higher prices than in the surrounding sub-region.

Table 1.1 Median Dwelling price, York (2016)

	Median Dwelling Price 2016
York	£220,000
North Yorkshire	£199,995
England	£224,995

Source: ONS Price Paid Data

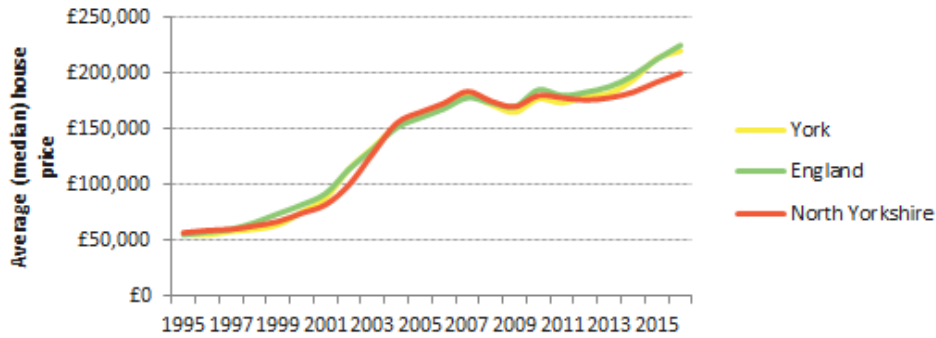
- 1.10 CLG publishes series data on median house prices based on the same Land Registry price paid data series. This currently runs from 1996 to 2016. This longitudinal analysis is illustrated in Figure 1.1, which indicates that the City of York has seen virtually identical levels of house price growth to the national average since 1999. The figure remains slightly below the England

² 2a-020-20140306

³ 2a-019-20140306

average at present, but is above the North Yorkshire median.

Figure 1.1 Median House Prices



Source: ONS Price Paid Data

- 1.11 In 2016 median house prices in York were just 2% lower than the national average, whilst the City ranked as being the 166th most expensive place to live in England (out of 326 districts).
- 1.12 It is particularly important to note that over the previous 17 years (1999-2016), median house prices have increased by 244% (or £156,000) in York, compared to 204% nationally and 199% across North Yorkshire as a whole.
- 1.13 As set out in the Practice Guidance, higher house prices and long term, sustained increases can indicate an imbalance between the demand for housing and its supply. The fact that York's median house prices have effectively tripled in 17 years, from £64,000 in 1999 to £220,000 in 2016, and have risen at a much faster rate than comparable national and sub-regional figures, suggests that the local market is experiencing considerable levels of stress.

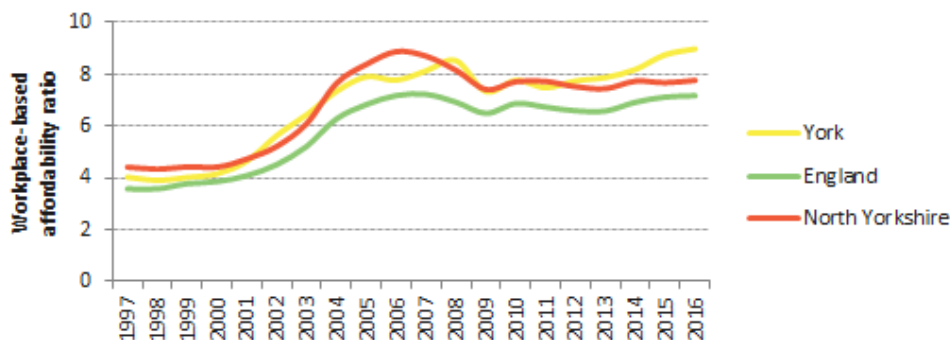
Affordability

- 1.14 The CLG's former SHMA Practice Guidance defines affordability as a '*measure of whether housing may be afforded by certain groups of households*'⁴. A household can be considered able to afford to buy a home if it costs 3.5 times the gross household income for a single earner household or 2.9 times the gross household income for dual-income households. Where possible, allowance should be made for access to capital that could be used towards the cost of home ownership [page 42].
- 1.15 The Practice Guidance concludes that assessing affordability involves comparing costs against a household's ability to pay, with the relevant indicator being the ratio between lower quartile house prices and lower quartile [LQ] earnings.
- 1.16 Using CLG affordability ratios, Figure 1.2 illustrates that although the ratio fell substantially from a peak of 8.14 in 2008 following the financial crash and subsequent economic downturn, it has steadily increased since 2009 at a much faster rate than North Yorkshire as a whole. This suggests that levels of affordability are declining in York at a pace which is not the case for the rest of the sub-region (and indeed, for the country as a whole). In 2016, the median house price

⁴ Annex G

in York City was approximately 9.0-times the LQ (workplace-based) income, compared to 7.8 for North Yorkshire and 7.2 nationally.

Figure 1.2 Ratio of house price to lower quartile earnings



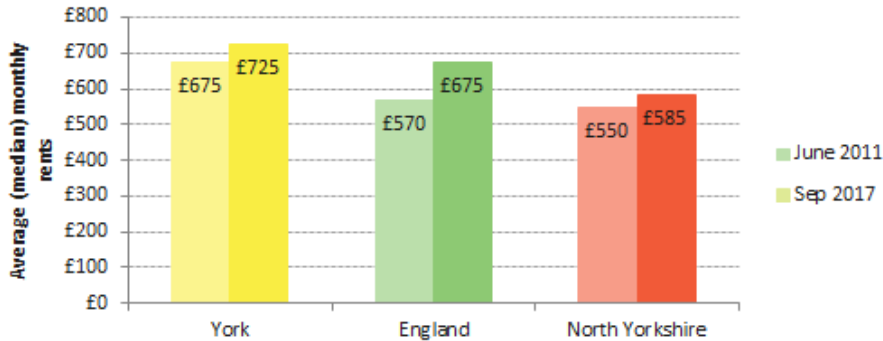
Source: ONS Affordability Data

- 1.17 It can be seen in Figure 1.2 that over the past 19 years, the ratio of lower quartile house prices to lower quartile earnings in York has been consistently above the national average, with the gap widening over time. Indeed, the rate of increase is worrying – between 2002 and 2016, the affordability ratio increased by 39%, significantly above the comparable growth rate for North Yorkshire (+27%) and England (+37%). Indeed, across the whole of northern England, only Manchester City has experienced a higher rate of increase in its affordability ratio than York.
- 1.18 The affordability ratio highlights a constraint on people being able to access housing in York, with house price increases and rental costs outstripping increases in earnings at a rate well above the national level.

Rents

- 1.19 On a similar basis, high and increasing private sector rents in an area can be a further signal of stress in the housing market. Median rents in York are £725 per month, with median rents ranging from £595 per month for a 1 bed flat, to £1,500 per month for a 4+ bed house. All of these figures are significantly higher than the national average, with overall average rents comprising £675 across England, and £585 for North Yorkshire. Rental levels are therefore 7.4% higher than comparable national figures (Figure 1.3).

Figure 1.3 Median Monthly Rents



Source: VOA Private Rental Market Statistics

Rate of Development / Under delivery

1.20 The rate of development is intended to be a supply-side indicator of previous delivery. The Practice Guidance states that:

“...if the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan”⁵

1.21 York has never had an adopted Local Plan, hence the only relevant previous ‘planned supply’ figure is the target within the former Yorkshire and the Humber RS up to 2012. Thereafter, we have compared delivery against the household projections and its preferred OAHN range, as set out in Table 1.2.

Table 1.2 Rate of net housing delivery in York against possible policy benchmarks, 2004/05-2015/16

Year	Net Housing Completions	Council's OAHN (867 dpa)	
		'Need'*	+/-
2004/05	1,160	640	+520
2005/06	906	640	+266
2006/07	798	640	+158
2007/08	523	640	-117
2008/09	451	850	-399
2009/10	507	850	-343
2010/11	514	850	-336
2011/12	321	850	-529
2012/13	482	867	-385
2013/14	345	867	-522
2014/15	507	867	-360
2015/16	1,121	867	+254
2016/17	977	867	110
Total	8,612	10,295	-1,683

Source: ARUP (August 2015): Evidence on housing Requirements in York: 2015 Update, Table 4 and City of York Half Year Housing Monitoring Update for Monitoring Year 2017/181

*RSS assumed average 640 dpa 2005/05-2007/08; 850 dpa 2008/09 -2011/12

⁵Section 2a-019-20140306

- 1.22 It is clear from the Council's own evidence that the City has consistently under-delivered housing, with a failure to deliver anything more than 525 dwellings in any single year between 2007 and 2015. The policy benchmarks suggest that the level of past under-delivery is 1,683 dwellings over the past 13 years.
- 1.23 Furthermore, the Council's already low housing delivery figures have been artificially boosted by the inclusion of student accommodation in the completions figures. For example, CYC's 2012/13 Annual Monitoring Report states that 482 (net) dwellings were completed in 2012/13, but this figure includes 124 student cluster flats. The 6 months completions data set out in CYC's Housing Monitoring Update (Table 3, October 2017) suggested that the Council was continuing to rely on student housing completions to boost its housing numbers, with 637 of the total 1,036 net completions during the first half of the 2017/18 monitoring year comprising privately managed off-campus student accommodation.

Overcrowding and Homelessness

- 1.24 Indicators on overcrowding, sharing households and homelessness demonstrate un-met need for housing within an area. The Practice Guidance suggests that long-term increases in the number of such households may be a signal that planned housing requirements need to be increased.
- 1.25 The Guidance states that indicators on:
- "...overcrowding, concealed and sharing households, homelessness and the number in temporary accommodation demonstrate unmet need for housing. Longer term increases in the number of such households may be a signal to consider increasing planned housing numbers..."*⁶
- 1.26 The Census measures overcrowding based on a standard formula, which measures the relationships between members of a households (as well as the number of people in that household) to determine the number of rooms they require. A rating of -1 or less indicates a household has one fewer room than required, +1 or more indicates a household has one or more rooms than needed. At the national level, affordability issues in recent years, as well as a shortfall in housing supply, have meant that people are either willing to accept sub-optimal living conditions (e.g. living in a smaller home to manage costs) or are forced into accepting such housing outcomes (e.g. are priced out of the market and have to share with friends/family).
- 1.27 Table 1.3 illustrates that overcrowding against the occupancy rating in York is not severe, with 7.10% of households living in a dwelling that is too small for their household size and composition. This compares to 8.7% nationally. However, it represents a significant increase of 2 percentage points on the 5.1% recorded in York in 2001, which is above the national trend (which had increased by 1.6 percentage points from 7.1% in 2011).

⁶ Section 2a-019-20140306

Table 1.3 Overcrowding: Household Room Occupancy Rating

	2001			2011		
	Total Households	-1 room occupancy or less	-1 room occupancy or less (%)	Total Households	-1 room occupancy or less	-1 room occupancy or less (%)
York	76,926	3,887	5.1%	83,552	5,930	7.1%
England	20,451,427	1,457,512	7.1%	22,063,368	1,928,596	8.7%

Source: Census 2001 / Census 2011

Note: The definition of the Census 'bedroom standard' is slightly different from the 'occupancy rating' that informs the Government's Under-Occupancy Charges, i.e. the Census states that 'two persons of the same sex aged between 10 and 20' can occupy one bedroom, whilst the Under Occupancy Charge changes this to 'any two children of the same sex aged under 16'. It is possible that if the Government's policy continues into the long term, then changes will be made to the categorisation of the Census's Occupancy Rating to bring the two datasets into line.

1.28 The Census also recorded the number of concealed families (i.e. where there is more than one family present in a household). Nationally, this rose significantly between 2001 and 2011, at least in part due to the impact of the recession on younger households' ability to afford their own home. This meant that many younger people, including families, remained in the family home for longer than might have been expected in the past, either through choice (to save money) or through necessity.

1.29 At the time of the 2011 Census, 1.9% of all families in England were concealed; this represented 275,954 families. This is a rise compared to 2001 when 1.2% of families were concealed. In York, a lower percentage of families were concealed (1.1%) than nationally (1.9%). However, this represents a higher proportional rise, of almost two thirds, from the 2001 figure. This is presented in Table 1.4.

Table 1.4 Concealed Families in York, Yorkshire and Humber and England 2001-2011

	Concealed Families		Change (percentage points)	Change in %
	2001	2011		
York	330 (0.7%)	586 (1.1%)	+0.43	+65.7%
Yorkshire and the Humber	15,890 (1.1%)	25,410 (1.7%)	+0.57	+51.1%
England	161,254 (1.2%)	275,954 (1.9%)	+0.69	+59.2%

Source: Census 2011/2011

1.30 The levels of overcrowding and concealed households in York are moderate when compared with the national and regional averages but have increased at a higher rate (albeit from a lower base). While the level of overcrowding and number of concealed households is not so significant as to conclude that there is severe market pressure, it nevertheless highlights inadequacy reducing flexibility in the housing market.

1.31 The levels of overcrowding are likely to be a symptom associated with restricted incomes in York, with people either willing to accept sub-optimal living conditions (e.g. living in smaller houses to manage costs) or forced into accepting such housing outcomes (e.g. are priced out and have to share with friends/family). In such circumstances, overcrowding and concealed households may be indicative of insufficient supply to meet demand.

- 1.32 Table 1.5 indicates that York has a comparatively low number of homeless people in priority need, of just 97 (or 1.1 per 1,000 households), which is less than half the national rate. The fall in homelessness levels in the City has also been much more pronounced than elsewhere in England over the past ten years, although broadly comparable to Yorkshire and the Humber as a whole.

Table 1.5 Number accepted as being homeless and in priority need 2006/07-2016/17

	Homeless and in Priority Need		% Change	Absolute Change
	2006/07	2016/17		
York	213 (2.70 / 1,000 H'holds)	97 (1.1 / 1,000 H'holds)	-54%	-1.60 / 1,000 H'holds
Yorkshire and the Humber	8,220 (3.87 / 1,000 H'holds)	3,670 (1.60 / 1,000 H'holds)	-55%	-2.27 / 1,000 H'holds
England	73,360 (3.48 / 1,000 H'holds)	59,110 (2.54 / 1,000 H'holds)	-19%	-0.94 / 1,000 H'holds

Source: CLG Live Table 784: Local authorities' action under the homelessness provisions of the Housing Acts (P1e returns)

Synthesis of Market Signals

- 1.33 Drawing together the individual market signals above begins to build a picture of the current housing market in and around York; the extent to which demand for housing is not being met; and the adverse outcomes that are occurring because of this.
- 1.34 The performance of York against County and national comparators for each market signal is summarised in Table 1.6. When quantified, York has performed worse in market signals relating to both absolute levels and rates of change against North Yorkshire and England in 13 out of 28 measures.
- 1.35 It is clear that the City is currently facing very significant challenges in terms of house prices and private rental values causing affordability difficulties.

Table 1.6 Summary of York Market Signals against North Yorkshire and England

Market Signal	North Yorkshire		England	
	Absolute Figure	Rate of Change	Absolute Figure	Rate of Change
House Prices	Worse	Worse	Better	Worse
Affordability Ratios	Worse	Worse	Worse	Worse
Private Rents	Worse	Worse	Worse	Better
Past Development	~	~	~	~
Homelessness (Households in Temporary Accommodation)	Better	Better	Better	Better
Homelessness (Households in Priority Need)	Better	Better	Better	Better
Overcrowding (Overcrowded Households)	Worse	Worse	Better	Worse
Overcrowding (Concealed Families)	Same	Same	Better	Better

Source: Lichfields Analysis

Footnote: Worse = performing worse against the average
 Better = performing the same or better against the average
 ~ = data not available

- 1.36 To draw meaningful conclusions on the extent to which these market indicators show housing market stress within the City of York and a level of supply that is not meeting demand, the Practice Guidance suggests that comparisons of absolute levels and rates of change in such indicators should be made with comparator areas and nationally. For this reason, York has been compared and ranked against other local authority areas, and England as a whole.
- 1.37 These comparator areas have been chosen on the following basis:
- 1 Other nearby areas within the wider Yorkshire and the Humber Region:
 - a East Riding
 - b Hambleton
 - c Harrogate
 - d Hull
 - e Leeds
 - f Ryedale
 - g Selby
 - h Wakefield
 - 2 The Practice Guidance also states that market signals must be compared with authorities which are not necessarily close geographically, but which share characteristics in terms of economic and demographic factors. These authorities have been chosen by examining the ‘OAC Supergroup Area Classification Map’, produced by the ONS in 2015, which groups each local authority into various socio-economic classifications. York, as a ‘Coast and Heritage’ authority, has been compared with other communities similarly classified within this ranking and which share similar socio-economic characteristics:
 - a Bath and North East Somerset
 - b Canterbury
 - c Cheltenham
 - d Colchester
 - e Lancaster
 - f Scarborough
 - g Taunton Deane
 - h Worcester
- 1.38 England has been used as the final comparator for both sets of tables. A comparison across the range of housing market signals within the authorities identified above is presented in Table 1.7 and Table 1.8. A higher ranking in these tables suggests a worse, or comparatively poorer-performing, housing market for that indicator.

Table 1.7 York Market Signals Comparator Table [Neighbouring Authorities]

Rank	House Prices (to year ending December)			Resident-based Affordability			Workplace-based Affordability			Rents		
	2016	Change (£) 1999-2016	Change (%) 1999-2016	2016	Change (absolute) 2002-2016	Change (%) 2002-2016	2016	Change (absolute) 2002-2016	Change (%)	Sep 2017	Change (absolute) June 2011-Sep 2017	Change (%) June 2011-Sep 2017
1	Harrogate	Harrogate	York	Ryedale	Ryedale	gston upon Hull, Cit	Ryedale	Ryedale	gston upon Hull, Cit	York	England	England
2	England	York	Harrogate	Harrogate	Harrogate	ast Riding of Yorkshi	Harrogate	York	Ryedale	Harrogate	Leeds	Leeds
3	Hambleton	England	Ryedale	York	York	Wakefield	York	gston upon Hull, Cit	York	England	Harrogate	gston upon Hull, City of
4	York	Hambleton	Selby	Hambleton	ast Riding of Yorkshi	England	Hambleton	England	ast Riding of Yorkshi	Leeds	gston upon Hull, Cit	Harrogate
5	Ryedale	Ryedale	England	England	England	Ryedale	Selby	ast Riding of Yorkshi	England	Hambleton	York	Ryedale
6	Selby	Selby	Hambleton	Selby	gston upon Hull, Cit	York	England	Harrogate	Wakefield	Ryedale	Ryedale	Selby
7	Leeds	ast Riding of Yorkshi	gston upon Hull, Cit	ast Riding of Yorkshi	Selby	Harrogate	Selby	ast Riding of Yorkshi	Selby	Selby	Selby	York
8	ast Riding of Yorkshi	Leeds	ast Riding of Yorkshi	Leeds	Wakefield	Leeds	Leeds	Hambleton	Leeds	Wakefield	ast Riding of Yorkshi	ast Riding of Yorkshire
9	Wakefield	Wakefield	Leeds	Wakefield	Leeds	Selby	Wakefield	Wakefield	Harrogate	ast Riding of Yorkshi	Hambleton	Hambleton
10	gston upon Hull, Cit	gston upon Hull, Cit	Wakefield	gston upon Hull, Cit	Hambleton	Hambleton	gston upon Hull, Cit	Leeds	Hambleton	gston upon Hull, Cit	Wakefield	Wakefield
11												
12												
13												
14												
	ONS Price Paid Data			ONS Affordability Data			ONS Affordability Data			VOA Private Rental Market Statistics		

Rank	Overcrowded households			Concealed families			~			~		
	2011	Change (% points)	Change (number)	2011	Change (% points)	Change (number)						
1	Leeds	York	England	England	gston upon Hull, Cit	England						
2	England	England	Leeds	Leeds	England	Leeds						
3	gston upon Hull, Cit	gston upon Hull, Cit	gston upon Hull, Cit	gston upon Hull, Cit	Selby	gston upon Hull, City of						
4	York	Leeds	York	Wakefield	Leeds	Wakefield						
5	Wakefield	Harrogate	ast Riding of Yorkshi	Selby	Wakefield	ast Riding of Yorkshire						
6	Harrogate	Selby	Wakefield	York	York	York						
7	Selby	ast Riding of Yorkshi	Harrogate	Hambleton	Hambleton	Selby						
8	ast Riding of Yorkshi	Wakefield	Selby	ast Riding of Yorkshi	ast Riding of Yorkshi	Harrogate						
9	Ryedale	Hambleton	Hambleton	Harrogate	Harrogate	Hambleton						
10	Hambleton	Ryedale	Ryedale	Ryedale	Ryedale	Ryedale						
11												
12												
13												
14												
	Census			Census								

Table 1.8 York Market Signals Comparator Table ['Coast and Heritage' Authority Comparisons]

Rank	House Prices (to year ending December)			Resident-based Affordability			Workplace-based Affordability			Rents		
	2016	Change (£) 1999-2016	Change (%) 1999-2016	2016	Change (absolute) 2002-2016	Change (%) 2002-2016	2016	Change (absolute) 2002-2016	Change (%)	Sep 2017	Change (absolute) June 2011-Sep 2017	Change (%) June 2011-Sep 2017
1	and North East Som	and North East Som	Canterbury	and North East Som	and North East Som	Lancaster	Canterbury	Canterbury	York	and North East Som	Lancaster	Lancaster
2	Canterbury	Canterbury	York	Canterbury	Canterbury	and North East Som	and North East Som	York	England	Canterbury	and North East Som	and North East Somerset
3	Cheltenham	Colchester	Colchester	York	York	England	York	and North East Som	Lancaster	York	England	England
4	Colchester	Cheltenham	and North East Som	Colchester	Colchester	Canterbury	Cheltenham	England	Canterbury	Colchester	Colchester	Colchester
5	England	York	England	Taunton Deane	England	York	Cheltenham	Cheltenham	Cheltenham	Cheltenham	Worcester	Worcester
6	York	England	Lancaster	Worcester	Lancaster	Colchester	Taunton Deane	Lancaster	and North East Som	England	Cheltenham	Scarborough
7	Taunton Deane	Taunton Deane	Cheltenham	Cheltenham	Scarborough	Scarborough	Worcester	Worcester	Worcester	Taunton Deane	Scarborough	Cheltenham
8	Worcester	Worcester	Taunton Deane	England	Worcester	Worcester	England	Colchester	Scarborough	Worcester	Canterbury	Taunton Deane
9	Lancaster	Lancaster	Scarborough	Scarborough	Taunton Deane	Taunton Deane	Scarborough	Scarborough	Colchester	Lancaster	York	Canterbury
10	Scarborough	Scarborough	Worcester	Lancaster	Cheltenham	Cheltenham	Lancaster	Taunton Deane	Taunton Deane	Scarborough	Taunton Deane	York
11												
12												
13												
14												
	ONS Price Paid Data			ONS Affordability Data			ONS Affordability Data			VOA Private Rental Market Statistics		

Rank	Overcrowded households			Concealed families			~			~		
	2011	Change (% points)	Change (number)	2011	Change (% points)	Change (number)						
1	England	York	England	England	England	England						
2	Cheltenham	Colchester	York	Worcester	Canterbury	York						
3	Canterbury	Cheltenham	Colchester	Canterbury	York	Canterbury						
4	Colchester	England	and North East Som	Scarborough	Taunton Deane	Colchester						
5	York	Worcester	Canterbury	Lancaster	Scarborough	and North East Somerset						
6	and North East Som	and North East Som	Cheltenham	Taunton Deane	Worcester	Taunton Deane						
7	Worcester	Taunton Deane	Worcester	York	Colchester	Scarborough						
8	Scarborough	Canterbury	Taunton Deane	and North East Som	Lancaster	Lancaster						
9	Taunton Deane	Scarborough	Scarborough	Cheltenham	and North East Som	Worcester						
10	Lancaster	Lancaster	Lancaster	Colchester	Cheltenham	Cheltenham						
11												
12												
13												
14												
	Census			Census								

- 1.39 It is clear from this analysis that the housing market in the City of York is increasingly dysfunctional, with a very steep level of house price growth in recent years leading to significant affordability challenges generating adverse outcomes for residents who need to access the housing market. The comparative analysis suggests that when compared against neighbouring Yorkshire districts, York has experienced the highest rate of house price growth over the period 1999 to 2016, at levels significantly above the national average at a rate higher than the national level of growth. Only Harrogate and Hambleton have higher house prices, whilst only Harrogate and Ryedale have higher affordability ratios.
- 1.40 Median rental levels are also the highest of all the comparator Yorkshire authorities and the City has the highest rate of change of overcrowded households.
- 1.41 The performance of York's housing market relative to comparable authorities further afield (Table 1.8) which share similar socio-economic characteristics also suggests that the local housing market is under stress, with York amongst the very worst performing districts regarding rates of change in house prices, absolute and relative changes in affordability, median rents, and the rate of change in overcrowded households and concealed families.
- 1.42 The Practice Guidance, as well as providing general economic principles, points towards such factors as indicating that additional supply, over and above that solely needed by demographic change, may need to be delivered in order to address affordability and to reverse adverse housing market trends within the HMA.

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London
020 7937 4477
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Manchester
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Newcastle
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newcastle@lichfields.uk

Thames Valley
0188 334 1920
thamesvalley@lichfields.uk

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

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Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	Mr
First Name	Jonathan	Steven
Last Name	Abbott	Longstaff
Organisation (where relevant)	Taylor Wimpey UK Ltd	ELG Planning
Representing (if applicable)		Taylor Wimpey UK Ltd
Address – line 1	C/O Agent	Gateway House
Address – line 2		55 Coniscliffe Road
Address – line 3		Darlington
Address – line 4		
Postcode		DL37EH
E-mail Address		steven@elgplanning.co.uk
Telephone Number		01325 469236

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Guidance note



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Do I have to use the response form?

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Do I need to attend the Public Examination?

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)

3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

N/A

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework



5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared **Justified**
Effective **Consistent with national policy**

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Taylor Wimpey UK Ltd object to the Policy H3 as it is not effective, justified nor consistent with national policy and is therefore not sound.

TW support the representations made by the HBF on this policy and would reiterate that SHMAs only ever reflect a snap shot in time and the policy must include flexibility to reflect market demand and aspirations.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

TW fully support the HBFs suggested modifications (repeated below) to Policy H3 and consider that these changes will make the policy sound.

- *'Proposals for residential development **should seek to** will be required to balance the housing market by including a mix of types of housing which reflects the **local market demand and the** diverse mix of need across the city'.*
- *'The housing mix proposed should have reference to the SHMA and be informed by:*
- *Up to date evidence of need including at a local level;*
- ***Market demand and local aspirations;** and*
- *The nature of the development site and the character of the local surrounding area'.*

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

TW have fundamental objections to Policy H3 as set out above on matters which need to be addressed as part of a Hearing session.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Representations must be received by Wednesday 4 April 2018, up until midnight.
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Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

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Signature

S Longstaff

Date

04/04/2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

N/A

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Positively prepared **Justified**
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5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Taylor Wimpey UK Ltd object to Policy H4 as it is not justified and therefore not sound. TW do not consider that placing an arbitrary requirement on strategic sites for the provision of self-build plots will help people wishing to build their own home. There is no evidence to suggest that people wanting to build their own home would want to live within a larger housing development.

Moreover, as the HBF point out in their representations the proposed approach only changes the type of house and does not contribute to boosting the supply of housing.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

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A much more sensible approach would be to have a policy that allow the construction of self-built plots within or the edge of relevant settlements or specific small allocation for self-built plots in suitable locations.

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Yes, I wish to appear at the examination

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TW have fundamental objections to Policy H4 as set out above on matters which need to be addressed as part of a Hearing session.

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Signature

S Longstaff

Date

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To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	Mr
First Name	Jonathan	Steven
Last Name	Abbott	Longstaff
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Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

- Online via our website www.york.gov.uk/localplan.
- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

N/A

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared Justified
 Effective Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Housing Requirement

Taylor Wimpey UK Ltd strongly object to Policy SS1, as the approach being undertaken by the Council is unsound. It is not justified, consistent with national planning policy, effective nor is it positively prepared.

The Council's suggested housing requirement of 867 dwellings per annum over the plan period to 2032/33 and post plan period to 2037/38 is lower than that suggested by GL Hearn within the SHLAA Addendum 2017. GL Hearn state:

'In response to both market signals and affordable housing need we have advocated a 10% uplift to the OAN. In line with the PPG this was set against the official starting point of 867 dpa. The resultant housing need would therefore be 953 dpa for the 2012-32 period'.

GL Hearn then outline the implications of not including an uplift for market signals and affordability as:

'Without the 10% uplift for market signals/affordable housing need the City's younger population would fail to form properly. This would result in greater numbers residing with parents or friends or in share accommodations such as HMOs'.

The draft housing requirement outlined in Policy SS1 is therefore inconsistent with the advice of the Council's own consultants.

Paragraph 17 of the NPPF states;

'every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities'.

The Council's current approach clearly falls short of this and therefore cannot be considered to be positively prepared and nor does it accord with national planning policy.

Moreover, the draft housing requirement falls considerably short of the figure set out in the DCLG's consultation paper 'Planning for the right homes in the right places' using the proposed standard methodology for calculating housing need. The proposed housing requirement figure for York is 1,070 dwellings per annum and the consultation paper states that there should be very limited grounds for adopting an alternative method which results in a lower need than the DCLG's proposed approach.

Further detailed representations have been made by Lichfields on these matters on behalf a number of housebuilders (including Taylor Wimpey UK Ltd) and their detailed assessment concludes that York's Housing Requirement should be 1,150 dwellings per annum. A copy of the representations is appended with a summary of their conclusions set out below:

'The scale of objectively assessed need is a judgement and the different scenarios and outcomes set out within this report provide alternative levels of housing growth for the City of York. Lichfields considers these to be as follows:

- **Demographic Baseline:** *The 2014-based household projections indicate a net household growth of 867dpa between 2014 and 2024 (including a suitable allowance for vacant/second homes. Once a suitable adjustment has been made to rebase the projections to the (slightly lower) 2015 MYE, and through the application of accelerated headship rates amongst younger age cohorts takes the demographic starting point to 871dpa.*
- **Market Signals Adjustment:** *GL Hearn's uplift is 10%. However, for the reasons set out above, Lichfields considers that a greater uplift of 20% would be more appropriate in this instance. When applied to the 871dpa re-based demographic starting point, this would indicate a need for 1,045dpa.*

The demographic-based projections would support a reasonable level of employment growth at levels above that forecast by Experian, past trends or the Blended job growth approach. As such, no upward adjustment is required to the demographic-based housing need figures to ensure that the needs of the local economy can be met;

- *The scale of **affordable housing needs**, when considered as a proportion of market housing delivery, implies higher levels of need over and above the 1,045dpa set out above. It is considered that to meet affordable housing needs in full (573dpa), the OAHN range should be adjusted to 1,910dpa @30% of overall delivery. It is, however, recognised that this level of delivery is likely to be unachievable for York. Given the significant affordable housing need identified in City of York Lichfields consider that a further 10% uplift would be appropriate in this instance and should be applied to the OAHN, resulting in a final figure of **1,150 dpa***

This is 7.5% higher than the MHCLG proposed standardised methodology figure of 1,070 dpa

This allows for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth. Using this range would ensure compliance with the Framework [§47] by significantly boosting the supply of housing. It would also reflect the Framework [§19], which seeks to ensure the planning system does everything it can to support sustainable development. We would note that these figures do not include the need for specialised student'.

When the Lichfields OAN requirement is correctly applied to the based date of 2012 and backlog taken into consideration, the five year requirement for the period 2017 to 2022 is now 1,980 dwellings per annum. According to the Council's housing trajectory in Fig 5.1 of the Local Plan, this level of delivery is not anticipated in any of the first five years thus informing the Plan will start from the position of failing to meet a five year supply.

In assessing the housing needs for York to inform the preparation of Policy SS1, the Council has failed to give proper consideration to market signals. Information relating to market signals was provided to the Council by its own consultants, GL Hearn and by the attached Lichfields OAN Report.

In setting the housing need under Policy SS1, contrary to the advice of its consultants and the recommendation of its officers (as set out in the report to Executive Committee on 13th July 2017), the Council has failed to give adequate reasons for choosing to set aside the advice and recommendations.

In the absence of proper consideration of market signals, the Local Plan fails to satisfy the 'soundness test' under NPPF, at para. 182.

The consequences of this are that the Local Plan is very likely to be found unsound by an Inspector and is likely to require substantive amendments and further rounds of consultation with all the delays that this will bring.

Previously Developed Land

TW also strongly object to the reference in the Policy SS1 that states 'where viable and deliverable, the re-use of previously developed land will be phased first'. This is contrary to the NPPF which states (paragraph 111) that development on brownfield land should be encouraged rather prioritised. The wording of Policy SS1 should therefore be amended to remove this reference as it is not consistent with NPPF and will unnecessarily *constrain housing delivery*.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Taylor Wimpey UK Ltd propose the following changes to the policy to make it sound:

- *'Deliver a minimum annual provision of 1,150 new dwellings over the plan period to 2032/33 and post plan period to 2037/38. This will enable the building of strong, sustainable communities through addressing the housing and community needs of York's current and future population.'*
- Delete: *'Where viable and deliverable, the re-use of previously developed land will be phased first'.*

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

TW have fundamental objections to Policy SS1 as set out above on matters which need to be addressed as part of a Hearing session.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature

Date

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

City of York Local Plan Publication Draft

Technical Report on Housing Issues

Linden Homes, Taylor Wimpey UK Ltd, Persimmon Homes, Strata Homes Ltd and Bellway Homes

March 2018

LICHFIELDS

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1.0 Introduction

- 1.1 Lichfields has been commissioned by Linden Homes, Taylor Wimpey UK Ltd, Persimmon Homes, Strata Homes Ltd & Bellway Homes [the Companies] to undertake a review of City of York Council's housing requirement and housing supply that has formed a key part of the evidence base to inform the City of York Local Plan Publication [LPP] Draft Consultation (March 2018).
- 1.2 Specifically, this report updates our September 2017 Technical Report on Housing Issues and provides a critique of the Objective Assessment of Housing Needs [OAHN] set out in the City of York Strategic Housing Market Assessment [SHMA] Assessment Update (September 2017, prepared by GL Hearn) following previous representations on behalf of the Companies on the 2016 SHMA and 2016 SHMA Addendum.
- 1.3 It also provides high level comments on the Council's housing land supply based on the evidence set out in the following documents:
- 1 The City of York Strategic Housing Land Availability Assessment [SHLAA] (September 2017);
 - 2 The City of York Local Plan Publication Draft (March 2018);
 - 3 Half Year Housing Monitoring Update for Monitoring Year 2017/18 (1st April 2017 to 30th September 2017); and,
 - 4 The City of York Windfall Allowance Technical Paper 2017 (SHLAA Annex 5).
- 1.4 Lichfields considers that on the basis of the contents of this report, the City of York Council is not providing sufficient land to meet the housing needs of the City and further sites should be allocated for housing development as part of the emerging Local Plan.
- 1.5 The remainder of this report is set out as follows:
- 1 **Section 2.0** - This section considers the approach which needs to be taken to calculating Objectively Assessed Housing Need [OAHN] and sets out the requirements of the Framework, the Practice Guidance and relevant High Court judgments in this context;
 - 2 **Section 3.0** – This section provides an overview of the findings of the 2016 SHMA and 2016 SHMA addendum, a summary of Lichfields response to these documents, and an overview of the findings of the September 2017 SHMA Assessment Update;
 - 3 **Section 4.0** - Provides a critique of the September 2017 SHMA Assessment Update. This Section sets out the extent to which the document fulfils the necessary requirements previously discussed and whether it represents the full, objectively assessed housing need for the City of York. **Appendix 1** sets out Lichfields' assessment of Market Signals in the City of York;
 - 4 **Section 5.0** - Considers the approach which needs to be taken to assessing housing land supply and sets out the requirements of the Framework, the Practice Guidance and relevant High Court judgments in this context;
 - 5 **Section 6.0** – Provides an overview of the Council's housing supply evidence;
 - 6 **Section 7.0** – Identifies the relevant housing requirement figures to be used for both the 5-year assessment and the plan period assessment;
 - 7 **Section 8.0** - Assesses the adequacy of the deliverable and developable supply of housing sites to meet the requirement for the plan period and 5-year period. It draws on the information supplied by the Council in the LPP and associated evidence base;
 - 8 **Section 9.0** - Assesses the housing supply against the OAHNs for York identified by the Council and by Lichfields; and,

- 9 **Section 10.0** Summarises the key issues within the Councils evidence base and sets out why it is not compliant with the requirements for an OAHN calculation and housing land supply.

2.0 Approach to Identifying OAHN

Introduction

- 2.1 This section sets out the requirements of the Framework and the Practice Guidance in objectively assessing housing needs. This will provide the benchmark against which the SHMA Assessment Update will be reviewed, to ensure the necessary requirements are met. In addition, relevant High Court judgments have been referenced to set out the requirements of an OAHN calculation in a legal context.

Policy Context

National Planning Policy Framework

- 2.2 The Framework outlines a two-step approach to setting housing requirements in Local Plans. Firstly, to define the full objectively assessed need for development and then secondly, to set this against any adverse impacts or constraints which would mean that need might not be met. This is enshrined in the approach defined in the Framework which sets out the presumption in favour of sustainable development:

“For plan-making this means that:

- *LPAs should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted.”¹*

- 2.3 The Framework goes on to set out that in order to 'boost significantly' the supply of housing, LPAs should:

“use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the framework...”²

- 2.4 The Framework sets out the approach to defining such evidence which is required to underpin a local housing requirement. It sets out that in evidencing housing needs:

“LPAs should have a clear understanding of housing needs in their area. They should:

- *prepare a SHMA to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*
 - *meets household and population projections, taking account of migration and demographic change;*

¹ Framework - §14

² Framework - §47

- *addresses the need for all types of housing, including affordable housing and the needs of different groups in the community...; and*
- *caters for housing demand and the scale of housing supply necessary to meet this demand... ”³*

2.5 Furthermore, the core planning principles set out in the Framework⁴ indicate that a planned level of housing to meet objectively assessed needs must respond positively to wider opportunities for growth and should take account of market signals, including housing affordability.

Draft National Planning Policy Framework

2.6 The Framework draft text for consultation was published in March 2018. It has an unequivocal emphasis on housing, with the introduction to the consultation proposals clarifying that the country needs radical, lasting reform that will allow more homes to be built, with the intention of reaching 300,000 net additional homes a year. The draft states that to support the Government’s objective of ‘significantly boosting the supply of homes’, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay [§60].

2.7 In particular:

“In determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method in national planning guidance – unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals. In establishing this figure, any needs that cannot be met within neighbouring areas should also be taken into account”. [§61]

2.8 The draft also makes it clear that when identifying the housing need, policies should also break the need down by size, type and tenure of homes required for different groups in the community (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes) [§62].

2.9 Paragraphs 68 - 78 also set out how Councils should identify and maintain a five years’ worth of housing against their housing requirement.

2.10 In terms of the weight that can be attached to this draft document, it is accepted that only limited weight can be attached to the document at present as it is still out for consultation. In this regard, paragraph 209 to Annex 1 of the draft Framework states that the policies in the previous Framework will apply for the purposes of examining plans, where those plans are submitted on or before the date which is 6 months after the final Framework’s publication. *“in these cases the examination will take no account of the new Framework”*.

2.11 However the draft Framework remains a useful indicator of the direction of travel, not least with the approach to be taken to defining housing need, which has already been the subject of an earlier consultation (*‘Planning for the right homes in the right places’*, September 2017), to which MHCLG published a summary of consultation responses and its view on the way forward in March 2018.

³ Framework - §159

⁴ Framework - §17

National Planning Practice Guidance

- 2.12 The Framework is supplemented by the Practice Guidance which provides an overarching framework for considering housing needs, but also acknowledges that:

“There is no one methodological approach or use of a particular dataset(s) that will provide a definitive assessment of development need”⁵.

- 2.13 The Guidance states that household projections published by CLG should provide the starting point estimate of overall housing need⁶.

- 2.14 Although the Practice Guidance notes that demographic trends should be applied as a starting point when assessing the OAHN, it goes on to state that consideration should also be given to the likely change in job numbers. This supports the importance that the Framework⁷ places on the economy and the requirement to *“ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”*. A failure to take account of economic considerations in the determination of the OAHN would be inconsistent with this policy emphasis.

- 2.15 The Inspector at the Fairford Inquiry⁸ recognised the role of economic factors in the assessment of the OAHN for Cotswold District:

“The Council has not provided a figure for OAN which takes account of employment trends. The Council argues that the advice in the PPG does not require local planning authorities to increase their figure for OAN to reflect employment considerations, but only to consider how the location of new housing or infrastructure development could help address the problems arising from such considerations. I disagree. In my view, the PPG requires employment trends to be reflected in the OAN, as they are likely to affect the need for housing. They are not “policy on” considerations but part of the elements that go towards reaching a “policy off” OAN, before the application of policy considerations. There is no evidence that the Council’s figures reflect employment considerations” [IR. §19].

- 2.16 This view reflects the position expressed by the Inspector (and confirmed by the Secretary of State) in the Pulley Lane Inquiries in Droitwich Spa⁹. The Inspector’s report (which was accepted by the SoS) states that:

“The Council’s case that “unvarnished” means arriving at a figure which doesn’t take into account migration or economic considerations is neither consistent with the (Gallagher) judgment, nor is it consistent with planning practice for deriving a figure for objectively assessed need to which constraint policies are then applied. Plainly the Council’s approach is incorrect. Clearly, where the judgement refers to ‘unvarnished’ figures (paragraph 29) it means environmental or other policy constraints. There is nothing in the judgement which suggests that it is not perfectly proper to take into account migration, economic considerations, second homes and vacancies”. [IR. §8.45]

- 2.17 Housing need, as suggested by household projections, should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Relevant signals may include land prices, house prices, rents, affordability (the ratio between lower quartile house prices and the lower quartile income or earnings can be

⁵ Practice Guidance – ID:2a-005-20140306

⁶ Practice Guidance – ID:2a-015-20140306

⁷ Framework - §158

⁸ Land South of Cirencester Road, Fairford (PINS Ref No: APP/F1610/A/14/2213318) (22 September 2014).

⁹ Land at Pulley Lane, Newland Road and Primsland Way, Droitwich Spa (APP/H1840/A/13/2199085) and Land north of Pulley Lane, Newland Road and Primsland Way, Droitwich Spa (PINS Ref No: APP/H1840/A/13/2199426) (2 July 2014).

used to assess the relative affordability of housing), rate of development and, overcrowding¹⁰:

“Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.”¹¹

- 2.18 In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable. The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be¹².
- 2.19 The Guidance recognises that market signals are affected by a number of economic factors, and plan makers should not attempt to estimate the precise impact of an increase in housing supply. Rather they should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability, and monitor the response of the market over the plan period¹³.
- 2.20 The Practice Guidance concludes by suggesting that the total need for affordable housing should be identified and converted into annual flows by calculating the total net need (subtracting total available stock from total gross need) and converting total net need into an annual flow.
- 2.21 The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments:
- “An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.”¹⁴*

Draft Planning Practice Guidance

- 2.22 Following on from the draft Framework, on 9th March 2018 MHCLG published its draft Planning Practice Guidance for consultation. This provides further detail on 6 main topic areas: viability; housing delivery; local housing need assessments; Neighbourhood Plans; Plan-making and Build-to-rent.
- 2.23 Regarding housing delivery, the draft Practice Guidance sets out how local authorities should identify and maintain a 5-year supply of specific deliverable sites, bringing the Guidance into line with recent Ministerial statements and High Court Judgements. In particular, it clarifies that along with older peoples’ housing, all student accommodation can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market.
- 2.24 Furthermore, LPAs should deal with deficits or shortfalls against planned requirements within the first 5 years of the plan period (i.e. the ‘Sedgefield’ approach to backlog).
- 2.25 In terms of the Local Housing Need Assessment, this takes forward the approach set out in CLG’s September 2017 consultation on *“Planning for the right homes in the Right Places”*. The proposed approach to a standard method for calculating local housing need, including transitional arrangements, is set out and as before, consists of three components. The starting point would continue to be a demographic baseline using the latest CLG household projections

¹⁰ Practice Guidance – ID:2a-019-20140306

¹¹ Practice Guidance – ID:2a-020-20140306

¹² Practice Guidance – ID:2a-020-20140306

¹³ *ibid*

¹⁴ Practice Guidance – ID: 2a-029-20140306

(over a 10-year time horizon), which is then modified to account for market signals (the median price of homes set against median workplace earnings). The modelling proposes that each 1% increase in the ratio of house prices to earnings above 4 results in a ¼% increase in need above projected household growth.

2.26 The uplift is then capped to limit any increase an authority may face when they review their plan:

- a *“for those authorities that have reviewed their plan (including a review of local housing need) or adopted their plan in the last five years, a cap may be applied to their new annual local housing need figure at 40 per cent above the average annual requirement figure currently set out in their plan; or*
- b *for those authorities that have not reviewed their plan (including a review of local housing need) or adopted their plan in the last five years, a cap may be applied to their new annual local housing need figure at 40% above whichever is higher of the projected household growth for their area over the 10 years (using Office for National Statistics’ household projections), or the annual housing requirement figure set out in their most recent plan if one exists.” [page 25]*

2.27 The various stages are set out in Figure 2.1.

Figure 2.1 Proposed methodology for determination of OAHN



Source: Lichfields

2.28 In terms of the ability of LPAs to deviate from this proposed new methodology, this is discouraged unless there are compelling circumstances not to adopt the approach. For example:

“There may be circumstances where it is justifiable to identify need above the need figure identified by the standard method. The need figure generated by the standard method should be considered as the minimum starting point in establishing a need figure for the purposes of plan production. The method relies on past growth trends and therefore does not include specific uplift to account for factors that could affect those trends in the future. Where it is likely that additional growth (above historic trends identified by household

projections) will occur over the plan period, an appropriate uplift may be applied to produce a higher need figure that reflects that anticipated growth. Circumstances where an uplift will be appropriate include, but are not limited to; where growth strategies are in place, strategic level infrastructure improvements are planned, funding is in place to promote and facilitate growth (i.e. Housing Deals, Housing Infrastructure Fund). In these circumstances, the local housing need figure can be reflected as a range, with the lower end of the range being as a minimum the figure calculated using the standard method. Where an alternative approach identifies a need above the local housing need assessment method, the approach will be considered sound, unless there are compelling reasons to indicate otherwise.” [page 26]

2.29 As to whether LPAs can identify a lower level of need, as York City Council is suggesting:

“Plan-making authorities should use the standard method for assessing local housing need unless there are exceptional circumstances to justify an alternative approach. Any deviation which results in a lower housing need figure than the standard approach will be subject to the tests of soundness and will be tested thoroughly by the Planning Inspectorate at examination. The plan-making authority will need to make sure that the evidence base is robust and based on realistic assumptions, and that they have clearly set out how they have demonstrated joint working with other plan-making authorities. In such circumstances, the Planning Inspector will take the number from the standard method as a reference point in considering the alternative method.” page 26]

2.30 Lichfields notes the following with regard to the weight to be can be attached to MHCLG’s proposed new method:

- 1 **Status of the document:** MHCLG’s document is currently out for consultation, has yet to be finalised and may be subject to significant numbers of objections from interested parties;
- 2 **Proposed Transitional Arrangements:** As noted in the draft Framework above, the policies in the previous Framework will apply for the purposes of examining plans, where those plans are submitted on or before the date which is 6 months after the final Framework’s publication.

Recent Legal Judgements

2.31 There have been several key recent legal judgments of relevance to the identification of OAHN, and which provide clarity on interpreting the Framework:

- 1 ‘St Albans City and District Council v (1) Hunston Properties Limited and (2) Secretary of State for Communities and Local Government [2013] EWCA Civ 1610’ referred to as “Hunston”;
- 2 ‘(1) Gallagher Homes Limited and (2) Lioncourt Homes Limited v Solihull Metropolitan Borough Council [2014] EWHC 1283’ referred to as “Solihull”;
- 3 ‘Satnam Millennium Limited and Warrington Borough Council [2015] EWHC 370’ referred to as “Satnam”; and,
- 4 ‘Kings Lynn and West Norfolk Borough Council v (i) Secretary of State for Communities and Local Government and (ii) Elm Park Holdings [2015] EWHC 1958’ referred to as “Kings Lynn”.

Hunston

- 2.32 “Hunston” [EWCA Civ 1610] goes to the heart of the interpretation of the Framework¹⁵. It relates to an appeal decision in respect of a scheme predominantly comprising housing on a Green Belt site. Its relevance is that it deals with the question of what forms the relevant benchmark for the housing requirement, when policies on the housing requirement are absent, silent or out of date as referred to in the Framework¹⁶.
- 2.33 Hunston establishes that §47 applies to decision-taking as well as plan-making and that where policies for the supply of housing are out of date, objectively assessed needs become the relevant benchmark.
- 2.34 Sir David Keene in his judgment at §25 stated:
- “... I am not persuaded that the inspector was entitled to use a housing requirement figure derived from a revoked plan, even as a proxy for what the local plan process may produce eventually. The words in paragraph 47(1), “as far as is consistent with the policies set out in this Framework” remind one that the Framework is to be read as a whole, but their specific role in that sub-paragraph seems to me to be related to the approach to be adopted in producing the Local Plan. If one looks at what is said in that sub-paragraph, it is advising local planning authorities:*
- “...to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework.”*
- “That qualification contained in the last clause quoted is not qualifying housing needs. It is qualifying the extent to which the Local Plan should go to meet those needs. The needs assessment, objectively arrived at, is not affected in advance of the production of the Local Plan, which will then set the requirement figure.”*
- 2.35 Crucially Hunston determined that it is clear that constraints should not be applied in arriving at an objective assessment of need. Sir David Keene in Hunston goes on to set out that [§§26-27]:
- “... it is not for an inspector on a Section 78 appeal to seek to carry out some sort of local plan process as part of determining the appeal, so as to arrive at a constrained housing requirement figure. An inspector in that situation is not in a position to carry out such an exercise in a proper fashion, since it is impossible for any rounded assessment similar to the local plan process to be done... It seems to me to have been mistaken to use a figure for housing requirements below the full objectively assessed needs figure until such time as the Local Plan process came up with a constrained figure.”*
- “It follows from this that I agree with the judge below that the inspector erred by adopting such a constrained figure for housing need. It led her to find that there was no shortfall in housing land supply in the district. She should have concluded, using the correct policy approach, that there was such a shortfall. The supply fell below the objectively assessed five year requirement.”*

Solihull

- 2.36 “Solihull” [EWHC 1283] is concerned with the adoption of the Solihull Local Plan and the extent to which it was supported by a figure for objectively assessed housing need. Although related to

¹⁵ Framework - §47

¹⁶ Framework - §14

plan-making, it again deals with the Framework¹⁷ and draws upon, and reiterates, the earlier Hunston judgment.

2.37 The judgment of Hickinbottom J in Solihull sets out a very useful summary of the staged approach to arriving at a housing requirement, providing some useful definitions of the concepts applied in respect of housing needs and requirements [§37]:

*“i) **Household projections:** These are demographic, trend-based projections indicating the likely number and type of future households if the underlying trends and demographic assumptions are realised. They provide useful long-term trajectories, in terms of growth averages throughout the projection period. However, they are not reliable as household growth estimates for particular years: they are subject to the uncertainties inherent in demographic behaviour, and sensitive to factors (such as changing economic and social circumstances) that may affect that behaviour...”*

*“ii) **Full Objective Assessment of Need for Housing:** This is the objectively assessed need for housing in an area, leaving aside policy considerations. It is therefore closely linked to the relevant household projection; but is not necessarily the same. An objective assessment of housing need may result in a different figure from that based on purely demographics if, e.g., the assessor considers that the household projection fails properly to take into account the effects of a major downturn (or upturn) in the economy that will affect future housing needs in an area. Nevertheless, where there are no such factors, objective assessment of need may be – and sometimes is – taken as being the same as the relevant household projection.”*

*“iii) **Housing Requirement:** This is the figure which reflects, not only the assessed need for housing, but also any policy considerations that might require that figure to be manipulated to determine the actual housing target for an area. For example, built development in an area might be constrained by the extent of land which is the subject of policy protection, such as Green Belt or Areas of Outstanding Natural Beauty. Or it might be decided, as a matter of policy, to encourage or discourage particular migration reflected in demographic trends. Once these policy considerations have been applied to the figure for full objectively assessed need for housing in an area, the result is a “policy on” figure for housing requirement. Subject to it being determined by a proper process, the housing requirement figure will be the target against which housing supply will normally be measured.”*

2.38 Whilst this is clear that a housing requirement is a “policy on” figure and that it may be different from the full objectively assessed need, Solihull does reiterate the principles set out in Hunston, namely that where a Local Plan is out of date in respect of a housing requirement (in that there is no Framework-compliant policy for housing provision within the Development Plan) then the housing requirement for decision taking will be an objective assessment of need [§88]:

“I respectfully agree with Sir David Keene (at [4] of Hunston): the drafting of paragraph 47 is less than clear to me, and the interpretative task is therefore far from easy. However, a number of points are now, following Hunston, clear. Two relate to development control decision-taking.

i) “Although the first bullet point of paragraph 47 directly concerns plan-making, it is implicit that a local planning authority must ensure that it meets the full, objectively assessed needs for market and affordable housing in the housing market, as far as consistent with the policies set out in the NPPF, even when considering development

¹⁷ Framework - §14 & §47

control decisions.”

- ii) *“Where there is no Local Plan, then the housing requirement for a local authority for the purposes of paragraph 47 is the full, objectively assessed need.”*

2.39 Solihull also reaffirms the judgment in Hunston that full objectively assessed needs should be arrived at, and utilised, without the application of any constraining factors. At §91 of the judgment the judge sets out:

“... in the context of the first bullet point in paragraph 47, policy matters and other constraining factors qualify, not the full objectively assessed housing needs, but rather the extent to which the authority should meet those needs on the basis of other NPPF policies that may, significantly and demonstrably outweigh the benefits of such housing provision.”

Satnam

2.40 “Satnam” [EWHC 370] highlights the importance of considering affordable housing needs in concluding on full OAHN. The decision found that the adopted OAHN figure within Warrington’s Local Plan was not in compliance with policy in respect of affordable housing because (as set out in §43) the assessed need for affordable housing need was never expressed or included as part of OAHN.

2.41 The decision found that the “*proper exercise*” had not been undertaken, namely:

- “(a) having identified the OAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes;”*
- “(b) the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in NPPF, paragraphs 14 and 47.”*

2.42 In summary, this judgment establishes that full OAHN has to include an assessment of full affordable housing needs.

Kings Lynn

2.43 Whilst “Satnam” establishes the fact that full OAHN must include affordable housing needs, “Kings Lynn” [EWHC 1958] establishes how full affordable housing needs should be addressed as part of a full OAHN calculation. The judgment identifies that it is the function of a SHMA to address the needs for all types of housing including affordable, but not necessarily to meet these needs in full. The justification of this statement is set out below in §35 to §36 of the judgment.

“At the second stage described by the second sub-bullet point in paragraph 159, the needs for types and tenures of housing should be addressed. That includes the assessment of the need for affordable housing as well as different forms of housing required to meet the needs of all parts of the community. Again, the PPG provides guidance as to how this stage of the assessment should be conducted, including in some detail how the gross unmet need for affordable housing should be calculated. The Framework makes clear these needs should be addressed in determining the FOAN, but neither the Framework nor the PPG suggest that they have to be met in full when determining that FOAN. This is no doubt because in practice very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice. That is because the vast majority of delivery will occur as a proportion of open-market schemes and is therefore dependent for its delivery upon market housing being

developed. It is no doubt for this reason that the PPG observes at paragraph ID 2a-208-20140306 as follows:

"i The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes."

"This consideration of an increase to help deliver the required number of affordable homes, rather than an instruction that the requirement be met in total, is consistent with the policy in paragraph 159 of the Framework requiring that the SHMA "addresses" these needs in determining the FOAN. They should have an important influence increasing the derived FOAN since they are significant factors in providing for housing needs within an area."

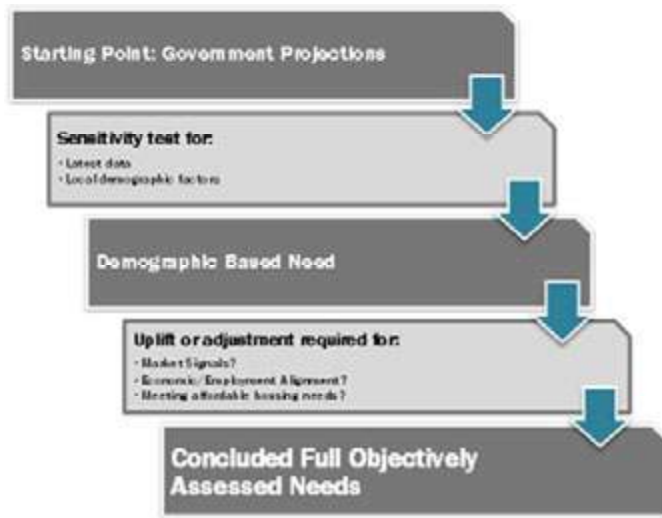
- 2.44 The judgment is clear that the correct method for considering the amount of housing required to meet full affordable housing needs is to consider the quantum of market housing needed to deliver full affordable housing needs (at a given percentage). However, as the judgment sets out, this can lead to a full OAHN figure which is so large that a LPA would have *"little or no prospect of delivering [it] in practice"*. Therefore, it is clear from this judgment that although it may not be reasonable and therefore should not be expected that the OAHN will include affordable housing needs in full, an uplift or similar consideration of how affordable needs can be 'addressed' is necessary as part of the full OAHN calculation. This reflects the Framework¹⁸.

Conclusion

- 2.45 It is against this policy context that the housing need for the City of York must be considered. In practice, applying the Framework and Practice Guidance to arrive at a robust and evidenced OAHN is a staged and logical process. An OAHN must be a level of housing delivery which meets the needs associated with population, employment and household growth, addresses the need for all types of housing including affordable and caters for housing demand.
- 2.46 Furthermore, a planned level of housing to meet OAHN must respond positively to wider opportunities for growth and should take account of market signals, including affordability. This approach has been supported by the recent Legal Judgements summarised above. This approach is summarised in Figure 2.2.

¹⁸ Framework - §158

Figure 2.2 The Framework and Practice Guidance Approach to Objectively Assessing Housing Needs



Source: Lichfields based upon the Framework / Practice Guidance

3.0 City of York Council's OAHN Evidence

Introduction

- 3.1 Before setting out a critique of CYC's housing OAHN evidence base, it is important to recognise that the Council has never had an adopted Local Plan for the City (under the 1971 Act, the 1990 Act or the 2004 Act) and progress on the current draft Local Plan has been, it is not unfair to say, glacial.
- 3.2 The development plan for York comprises two policies¹⁹ and the Key Diagram of the partially revoked Yorkshire and Humber Regional Strategy (2008) [YHRS]. There is no adopted Local Plan for York that forms part of the development plan. Instead, there is a long history of failed attempts to produce an adopted Local Plan.
- 3.3 The Council published the '*York Local Plan - Preferred Options*' document for consultation in summer 2013, followed by a 'Further Sites' consultation for six weeks in summer 2014 which included potential new sites and changes to the boundaries of some of the sites originally identified. Following these consultations, a '*Publication Draft Local Plan and Proposals Map*' was considered by the Local Plan Working Group [LPWG] and by Cabinet in September 2014²⁰. With the intention of progressing a Framework compliant Local Plan, the Cabinet resolved to carry through the LPWG's recommendations and approve the Local Plan Publication Draft for public consultation, subject to amendments circulated at the Cabinet meeting and to instruct officers to report back following the consultation with a recommendation on whether it would be appropriate to submit the Publication Draft for public examination.
- 3.4 However, at the Full Council on 9 October 2014²¹ a resolution was made to halt the public consultation on the Local Plan Publication Draft in order to reassess and accurately reflect objectively assessed housing requirements. The resolution also instructed officers to produce a report on the housing trajectory to be brought back to the next meeting of the LPWG in November 2014 along with the relevant background reports. The intention was for the report to allow the LPWG to agree an accurate analysis of the housing trajectory that is objective, evidence based and deliverable. The analysis was to be used to "*inform housing allocations and a new proposed Local Plan to be brought back to the next LPWG for discussion and recommendation to Cabinet in November.*"
- 3.5 The Council published the following 'further work' on the Local Plan relating to housing needs since the Full Council resolution to halt the Publication Draft Local Plan in 2014:
- 1 In December 2014, the LPWG considered a report on '*Housing Requirements in York*' which was based on two background documents produced by Arup²². The report set out four different housing requirement figures that were considered sound against the evidence base and three options for progressing the work on housing requirements. The LPWG members agreed a housing requirement figure of 926dpa²³;
 - 2 In September 2015 the LPWG considered an update on the '*Objective Assessment of Housing Need*' [OAHN] report produced by Arup²⁴ and a report on '*Economic Growth*'²⁵. The Arup report concluded that the housing 'requirement' should be in the range of 817

¹⁹ Both relating to Green Belt, requiring its inner boundaries to be defined in a plan and confirming that the general extent is about 6 miles out from the City centre

²⁰ Cabinet Meeting Thursday 25 September, 2014 - Minutes

²¹ Resolutions and proceedings of the Meeting of the City of York Council held in Guildhall, York on Thursday, 9th October, 2014

²² Assessment of the Evidence on Housing Requirements in York (Arup, May 2013) & Housing Requirements in York: Evidence on Housing Requirements in York: 2014 Update (Arup, September 2014)

²³ Local Plan Working Group 17 December 2014 - Minutes

²⁴ Evidence on Housing Requirements in York: 2015 Update – Arup (August 2015)

²⁵ York Economic Forecasts – Oxford Economics (May 2015)

dwellings per annum [dpa] to 854dpa between 2012 and 2031. The LPWG's recommendations were that the Executive Committee note the Arup OAHN report and endorse further work, including an evaluation of any spatial and delivery implications, on two scenarios for economic growth that would be reported back to the LPWG in due course;

- 3 In Autumn 2015 the Council commissioned GL Hearn jointly with Ryedale, Hambleton and the North York Moors National Park Authority to undertake a Strategic Housing Market assessment [SHMA]²⁶. This study aimed to provide a clear understanding of housing needs in the City of York area. The SHMA was published as part of a suite of documents for the LPWG meeting on 27th June 2016. It concluded that the OAHN for the City of York was in the order of 841dpa.
- 4 On the 25th May 2016 ONS published a new set of (2014-based) sub national population projections [SNPP]. These projections were published too late in the SHMA process to be incorporated into the main document. However in June 2016 GL Hearn produced an Addendum²⁷ to the main SHMA report which briefly reviewed key aspects of the projections and concluded that the latest (higher) SNPP suggested a need for some 898dpa between 2012 and 2032. However due to concerns over the historic growth within the student population, the Addendum settled on a wider OAHN range of 706dpa - 898dpa, and therefore the Council considered that it did not need to move away from the previous 841dpa figure.
- 5 DCLG published updated 2014-based sub-national household projections [SNHP] in July 2016. GL Hearn was asked by City of York Council to update the SHMA to take account of these new figures and to assess the representations received through the Preferred Sites Consultation [PSC] relating to OAN. The GL Hearn SHMA Addendum Update (May 2017) subsequently updated the demographic starting point for York based on these latest household projections. The 2014-based SNHP increases the demographic starting point from 783dpa (in the 2016 SHMA) to 867dpa. In their Update, GL Hearn then applied a 10% uplift to the 867dpa starting point to account for market signals and affordable housing need and identifies a resultant housing need of 953dpa. However, a cover sheet to GL Hearn's Update, entitled 'Introduction and Context to objective Assessment of Housing Need' was inserted at the front of this document by the Council. This states that 867dpa is the relevant baseline demographic figure for the 15 year period of the plan (2032/33). The Council rejected the 953dpa figure on the basis that GL Hearn's conclusions stating:

"...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."

- 3.6 As a result of this approach, the February 2018 City of York Publication Draft now states in Policy SS1: Delivering Sustainable Growth for York, the intention to:

"Deliver a minimum annual provision of 867 new dwellings over the plan period to 2032/33 and post plan period to 2037/38."

- 3.7 The supporting text to this policy makes no mention of the 953 dpa OAHN figure, but instead claims that 867 dpa is "*an objectively assessed housing need*" [§3.3].

- 3.8 The remainder of this section provides an overview of the findings of the 2016 SHMA and 2016 SHMA addendum, a summary of Lichfields response to these documents, and an overview of the findings of the September 2017 SHMA Assessment Update.

²⁶GL Hearn (June 2016): City of York Council Strategic Housing Market Assessment

²⁷GL Hearn (June 2016): City of York Council Strategic Housing Market Assessment - Addendum

Overview of the City of York SHMA

- 3.9 The emerging City of York Local Plan is currently underpinned by three key housing need documents:
- 1 City of York Strategic Housing Market Assessment [SHMA], prepared on behalf of CYC by GL Hearn in June 2016;
 - 2 City of York SHMA Addendum, prepared on behalf of CYC by GL Hearn in June 2016; and,
 - 3 City of York September 2017 SHMA Assessment Update prepared on behalf of CYC by GL Hearn.
- 3.10 These documents follow on from previous reports prepared to inform the emerging Local Plan including the *'City of York Council Housing Requirements in York Evidence on Housing Requirements in York: 2015 Update'* (August 2015) prepared by Arup and the *'North Yorkshire Strategic Housing Market Assessment'* (November 2011) prepared by GVA.
- 3.11 A review of these documents and Lichfields' previous submissions on the City of York SHMA (June 2016) and the SHMA Addendum (June 2016) has been provided below in order to provide the context to the issues raised in this Technical Report.

City of York SHMA (June 2016)

- 3.12 GL Hearn states that the SHMA was prepared *'essentially to sensitivity check'* the Arup August 2015 Housing Requirements in York report. However, it departs significantly from the Arup approach and undertakes an entirely new set of modelling using the 2012-based SNPP and 2012-based SNHP for the period 2012-2032. The subsequent Addendum was prepared to understand the implications on the earlier SHMA analysis of the publication of the 2014-based Sub-National Population Projections [SNPP] on 25th May 2016.
- 3.13 The SHMA concludes (Section 2.0) that the HMA which covers the City of York also extends to include Selby. However:
- "While we propose a HMA which links to Selby and York we are not considering housing need across the HMA. Selby has recently produced its own SHMA and this assessment does not seek to replicate it"* [§2.106]
- 3.14 GL Hearn undertook a number of demographic modelling scenarios including the 2012-based SNPP; long term migration trends and 2012-based SNPP adjusted to take into account the (higher) 2014 MYE. GL Hearn concluded that the SNPP *"is a sound demographic projection from a technical perspective"* [page 83], although they attached greater weight to a higher figure of 833 dpa based on a projection which takes into account the 2013 and 2014 Mid-Year Population Estimates [MYE] and rolls forward the SNPP.
- 3.15 The SHMA concluded that one of the most noteworthy findings from the analysis was the relatively small increase in the population aged 15-29 (which includes the vast majority of students):
- "Whilst over the 2001-2014 period this age group increased by 12,600, there is only projected to be a 2,500 increase over the 20-years to 2032. Such a finding is consistent with this age group not being expected to see any notable changes at a national level in the future...At the time of writing York University was not expecting significant increases in the student population, whilst St Johns was only expecting a modest increase. With this knowledge, and the age specific outputs from the SNPP we can have reasonable confidence that the SNPP is a realistic projection."* [§§4.31-4.32]
- 3.16 The projections are set out in Table 3.1.

Table 3.1 Summary of the City of York SHMA (June 2016) Range of Scenarios (2012-2032)

	Change in Households	Dwellings per annum (2012-2032)	Job growth per annum (2012-2032)
2012-based SNPP	15,093	783 dpa	(not provided)
2014-based	18,458	958 dpa	
UPC adjusted	12,676	658 dpa	
10-year migration	13,660	709 dpa	
2012-based SNPP (as updated)	16,056	833 dpa	
OE Baseline	15,019	780 dpa	609
OE Re-profiling			635
OE – higher migration	15,685	814 dpa	868
YHREM	15,356	797 dpa	789

Source: City of York SHMA (June 2016)

- 3.17 The analysis also considered future economic growth performance by accessing forecasts from Oxford Economics [OE] and Experian (via the Yorkshire and the Humber Regional Economic Modelling [YHREM]). The forecasts range from 609 jobs per annum (OE baseline) to 868 (OE higher migration).
- 3.18 The GL Hearn modelling concluded that this would support a level of population growth broadly in line with the 2012-based SNPP generating between 780-814dpa, which it considered to be below the level of need identified from the most recent MYE data:
- “On balance there is no justification for an uplift to housing numbers in the City to support expected growth in employment” [page 87].*
- 3.19 The SHMA proceeds to identify a relatively high level of affordable housing need, of 573dpa, above the 486dpa need identified by GVA in the 2011 SHMA. It states:
- “The analysis undertaken arguably provides some evidence to justify considering an adjustment to the assessed housing need to address the needs of concealed households, and support improvements [sic] household formation for younger households; although any adjustment will also need to take account of any future changes already within the household projections (e.g. in terms of improving household formation). The issue of a need for any uplift is considered alongside the analysis of market signals which follows.” [§6.112]*
- 3.20 However, the SHMA concludes that whilst the affordable housing need represents 69% of the need identified in the demographic-led projections, it is not appropriate to directly compare the need as they are calculated in different ways:
- “The analysis does not suggest that there is any strong evidence of a need to consider housing delivery higher than that suggested by demographic projections to help deliver more affordable homes to meet the affordable housing need.”*
- “However, in combination with the market signals evidence some additional housing might be considered appropriate to help improve access to housing for younger people. A modest uplift would not be expected to generate any significant population growth (over and above that shown by demographic projections) but would contribute to reducing*

concealed households and increasing new household formation. The additional uplift would also provide some additional affordable housing.” [page 115]

- 3.21 GL Hearn’s market signals analysis in the SHMA indicates that there are affordability pressures in the City of York:
- 1 Lower quartile to median income ratio is around 7.89 (compared to 6.45 nationally);
 - 2 House prices are also very high and tripled in the pre-recession decade. Private rental levels in York, at £675pcm, which are higher than comparator areas and nationally (£600pcm in England);
 - 3 Over-occupied dwellings increased by 52% between 2001 and 2011: “which is high relative to that seen at a regional or national level” [§8.34].
 - 4 Housing delivery in York:
“...has missed the target each year since 2007” [§8.38].
- 3.22 In this regard, GL Hearn concludes that:
- “It would therefore be appropriate to consider a modest upward adjustment to the demographic assessment of housing need to improve affordability over time.” [§8.99]*
- 3.23 To consider what level of uplift might be appropriate, GL Hearn sought to assess the degree to which household formation levels had been constrained for younger age groups, and what scale of adjustment to housing provision would be necessary for these to improve. This was derived on the assumption that household formation rates of the 25-34 age group would return to 2001 levels by 2025 (from 2015). This resulted in an increase in the annual housing provision of 8 homes per annum across the City for each of the aforementioned scenarios.
- 3.24 The SHMA confirms that this sensitivity analysis represents “*the market signals adjustment*” [§8.111], although in the light of GL Hearn’s conclusions concerning affordable housing needs (see above), this 8dpa uplift would also appear to be geared towards improving access to housing for younger people in the City.
- 3.25 The SHMA therefore concludes that applying an 8dpa uplift to the 833dpa preferred demographic scenario results in an overall housing OAHN of 841dpa over the 2012-2032 period.

SHMA Addendum (June 2016)

- 3.26 The Addendum revisits parts of the earlier City of York SHMA analysis following the publication of the 2014-based SNPP by ONS on 25th May 2016. The report found that the latest projections suggest a higher level of population growth, at levels around 28% higher than in the 2012-based SNPP.
- 3.27 GL Hearn’s analysis states that the difference between the 2014-based SNPP and the 2012-based SNPP “*is around 4,000 people, with around the same number being an additional increase in the 15-29 age group (4,200 of the difference)*” [§1.10].
- 3.28 GL Hearn considers that the growth in the younger age group is likely to reflect the strong growth in the student population in the City between 2008 and 2014 as a result of a new campus opening (the University of York expanded by 3,500 students over the period). The Update quotes an ONS response to CYC during the consultation to the latest projections, which suggests that some locally specific issues (such as the recorded outflow of male students from the city of York) may be under-estimated and should be treated with care.
- 3.29 This is in contrast to GL Hearn’s previous conclusions on the 2012-based SNPP (as set out in the earlier 2016 SHMA), where they considered that the 2012-based SNPP was a realistic projection because it forecast limited growth in the 15-29 age group going forward.

- 3.30 GL Hearn revisited the modelling using a revised long term migration trend and the 2014-based SNPP (Table 3.2).

Table 3.2 Summary of the city of York SHMA Addendum (June 2016) Range of Scenarios (2012-2032)

	2012-based SNHP Headship Rates		+ uplift to the 25-34 age group headship rates
	Change in Households	Dwellings per Annum	
2012-based SNPP	15,093	783	792
2012-based SNPP (updated)	16,056	833	841
2014-based SNPP	17,134	889	898
10-year Migration Trend	13,457	698	706

Source: City of York SHMA Addendum (June 2016)

- 3.31 Using the latest available data and including a “*market signals adjustment*” [§1.32] of 8dpa as contained in the SHMA “*and recognising concerns around the impact of historic student growth, this addendum identifies an overall housing need of up to 898dpa*”. [§1.20].
- 3.32 An update to the affordable housing need model increases the ‘*bottom line estimate of affordable housing need*’ from 573dpa to 627dpa.
- 3.33 The Addendum draws the following conclusions on OAHN:

“There are concerns relating to historic growth within the student population and how this translates into the SNPP projections. This looks to be a particular concern in relation to the 2014-based SNPP where there is a relatively strong growth in some student age groups when compared with the 2012-based version (which looks to be sound for those particular age groups). Some consideration could be given to longer term dynamics although this does need to recognise that the evidence suggests some shift in migration patterns over the more recent years – a 10 year migration trend using the latest available evidence calculates a need for 706dpa, although as noted this will not fully reflect some of the more recent trends. This projection is therefore not considered to be an appropriate starting point for which to assess housing need although it can be used to help identify the bottom end of a reasonable range.

“Given that the full SHMA document identifies an OAN for 841dpa which sits comfortably within this range set out in this addendum (706dpa – 898dpa) it is suggested that the Council do not need to move away from this number on the basis of the newly available evidence – particularly given the potential concerns about the impact of student growth in the 2014-based SNPP and also longer term trends not reflecting the most recent trends.” [§§1.33-1.34].

Lichfields Previous SHMA Representations

- 3.34 A review of the June 2016 Strategic Housing Market Assessment [SHMA], and the subsequent SHMA Addendum (June 2016) was submitted by Lichfields (then branded as Nathaniel Lichfield & Partners) on behalf of the Companies in September 2016 in response to the City of York Local Plan – Preferred Sites Consultation.
- 3.35 This review provided objective evidence on the local need and demand for housing in the City of York and its Housing Market Area [HMA]. It established the scale of need for housing in the

City of York based upon a range of housing, economic and demographic factors, trends and forecasts, based on the application of Lichfields' HEaDROOM framework.

3.36 More specifically it:

- 1 Considered the approach which needs to be taken to calculating OAHN and sets out the requirements of the Framework, the Practice Guidance and relevant High Court judgments in this context;
- 2 Provided a critique of the 841 dwellings per annum [dpa] identified as the City of York's OAHN in the June 2016 Strategic Housing Market Assessment [SHMA] for the City, and the subsequent SHMA Addendum which recommended a broader OAHN range of 706dpa to 898dpa and considered whether they represent the full, objectively assessed housing need for the City of York;
- 3 Set out the approach taken by Lichfields to define a new OAHN for the City of York, using the latest demographic evidence and economic forecasts and affordable housing needs;
- 4 Provided an analysis of market signals in the City;
- 5 Identified a revised OAHN for the City of York, based on Lichfields' PopGroup modelling; and,
- 6 Summarised the key issues within the SHMA and subsequent Addendum and sets out why it is not compliant with the requirements for an OAHN calculation.

3.37 The review concluded that the SHMA documents make a number of assumptions and judgements which Lichfields considered to be flawed, or which do not properly respond to the requirements of policy and guidance. As a result, the recommended OAHN was not robust and was inadequate to meet need and demand within the HMA.

3.38 The review noted that there were a number of significant deficiencies in the City of York SHMA and Addendum which means that the 841dpa OAHN figure currently being pursued by CYC is not soundly based. In particular:

- 1 The demographic modelling downplayed the robustness of the 2014-based SNPP which were not supported by the evidence in other aspects of the document;
- 2 As a result, the Council's 841dpa OAHN figure was actually below the demographic starting point in the latest 2014-based SNHP of 853hpa even before any adjustments were made;
- 3 Adjustments to headship rates had been conflated with the uplift for market signals. The SHMA did not apply a separate uplift for market signals, but instead made an adjustment to the demographic modelling based on changes to headship rates which should be part of a normal adjustment to the demographic starting point before market signals are considered. As a result, there was no adjustment for market signals at all despite the significant and severe market signal indicators apparent across the City of York;
- 4 A 'black-box' approach had been taken to the economic-led modelling, with key evidence relating to how the job projections had been factored into any PopGroup model being unpublished; and,
- 5 No explicit consideration or uplift applied in respect of delivering more homes to meet the needs of households in affordable housing need. This was despite the SHMA and Addendum indicating a level of affordable housing need (of 573dpa and 627dpa respectively) which would only be met well in excess of the concluded OAHN.

3.39 In combination, the judgements and assumptions applied within the SHMA sought to dampen the level of OAHN across the City of York. Fundamentally, it was considered that the OAHN(s) identified in the SHMA and Addendum failed to properly address market signals, economic or affordable housing needs, as envisaged by the Framework and Practice Guidance as clarified by High Court and Court of Appeal judgements.

- 3.40 Lichfields undertook its own analysis of housing need for the City of York. Based on the latest demographic data, and through the use of the industry standard PopGroup demographic modelling tool, it was Lichfields' view that the OAHN for York was at least 1,125dpa, although there was a very strong case to meet affordable housing needs in full, in which case the OAHN would equate to 1,255dpa (rounded).
- 3.41 If long term migration trends were to continue into the future, this would justify a higher OAHN of 1,420dpa, although due to uncertainties regarding the level of international net migration into York it was considered that less weight should be attached to this figure.
- 3.42 This allowed for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth. Using this range would ensure compliance with the Framework²⁸ by significantly boosting the supply of housing. It would also reflect the Framework²⁹, which seeks to ensure the planning system does everything it can to support sustainable development.

September 2017 SHMA Assessment Update

- 3.43 The stated purpose of GL Hearn's Assessment Update is to review the housing need in York taking into account of the latest demographic information. In particular, it reviews the impact of the 2014-based SNHP and the 2015 Mid-Year Estimates (both published June 2016).
- 3.44 The Assessment Update also reviews the latest evidence on market signals within the City. The report states that this is not a full trend-based analysis but rather a snapshot of the latest evidence to be read in conjunction with the full SHMA document. As such, the report does not revisit the affordable housing need for the City, nor does it update analysis on the mix of housing required or the needs for specific groups.
- 3.45 The report [§2.2] finds that over the 2012-32 period, the 2014-based SNPP projects an increase in population of around 31,400 people (15.7%) in York. This is somewhat higher than the 2012-based SNPP (12.2%) and also higher than the main 2016 SHMA projection (which factored in population growth of 13.7%).
- 3.46 The report [§2.11] states that the official population projections (once they are rebased to include the latest 2015 MYE) indicate a level of population growth which is higher than any recent historic period or any trend based forecast of growth. It should therefore be seen as a positive step to consider these as the preferred population growth starting point.
- 3.47 The analysis [§2.17] finds that by applying the headship rates within the 2014-based SNHP the level of housing need would be for 867dpa – this is c.4% higher than the figure (833dpa) derived in the 2016 SHMA for the main demographic based projection.

Table 3.3 Projected Household Growth 2012-32 - Range of demographic based scenarios

	Change in households	Dwellings (per annum)
2014-based SNPP	17,120	867
2014-based SNPP (+MYE)	17,096	866

Source: SHMA Assessment Update (September 2017)

- 3.48 The report [§2.19] notes that within the SHMA, analysis was also undertaken (as part of the

²⁸ Framework - §47

²⁹ Framework - §19

market signals analysis) to recognise a modest level of suppressed household formation – this essentially took the form of returning the household formation/headship rates of the 25-34 age group back to the levels seen in 2001 (which is when they started to drop). With an uplift to the household formation rates of the 25-34 age group, the housing need (when linked to 2014-based projections when updated) increases to 873dpa. When the mid-year estimates are factored in, the housing need decreases slightly to 871dpa.

Table 3.4 Projected Household Growth 2012-32 - Range of demographic based scenarios (with uplift to headship rates for 25-34 age group)

	Change in households	Dwellings (per annum)
2014-based SNPP	17,232	873
2014-based SNPP (+MYE)	17,209	871

Source: SHMA Assessment Update (September 2017)

3.49 The SHMA Assessment Update [§5.3-5.4] states:

“Furthermore there is also the clear desire of the Government to boost housing delivery, and therefore setting an OAN that is below the most recent official projections while justifiable might be difficult to support.”

“There is however an apparent continued suppression of household formation rates within younger age groups within the official projections. In order to respond to this we have increased the household formation rates in this age group to the levels seen in 2001. The housing need (when linked to 2014-based projections) increases to 873 dwellings per annum. When the mid-year estimates are included the housing need decreases to 871dpa. This should be seen as the demographic conclusions of this report”.

3.50 GL Hearn therefore clearly accepts that an increase in household formation rates is necessary to respond to continued suppression of household formation rates within younger age groups within the official projections. However this ‘demographic conclusion’ of 871dpa does not appear to have been carried forward by GL Hearn through to the next steps of calculating the resultant housing need, as summarised below.

3.51 With regard to market signals and affordable housing the Assessment Update [§3.19] notes that:

“On balance, the market signals are quite strong and there is a notable affordable housing need. Combined these would merit some response within the derived OAN. This is a departure from the previous SHMA and the Addendum which did not make any market signals or affordable housing adjustment.”

3.52 The report considers a single adjustment to address both of these issues on the basis that they are intrinsically linked. The Assessment Update [§3.28] states:

“Given the balance of judgement it would appear that a 10% adjustment could be justified in York on the basis of the previously established affordable housing need the updated market signals evidence.”

3.53 With regard to this matter the Assessment Update [§5.6-5.7] draws the following conclusions:

“In response to both market signals and affordable housing need we have advocated a 10% uplift to the OAN. In line with the PPG this was set against the official starting point of 867dpa. The resultant housing need would therefore be 953dpa for the 2012-32

period.”

“The level of housing need identified is someway higher than the previous SHMA reflecting the increased starting point but also the inclusion of a market signals uplift. This OAN would meet the demographic growth in the City as well as meet the needs of the local economy”.

- 3.54 Lichfields agrees with making an adjustment for demographic and household formation rates to get to 871dpa. However, it is illogical to then revert back to the unadjusted projections of 867dpa and then apply the adjustment for market signals and affordable housing to this lower, discredited figure.
- 3.55 Moving on, GL Hearn models a series of economic growth forecasts. In this regard, they conclude that the level of housing associated with the economic growth projections are lower than the 867/871dpa demographic need, the Assessment Update considers that there is no justification for an uplift to housing numbers in the City to support the expected growth in employment.
- 3.56 As such, the report concludes that by applying a 10% uplift to the demographic starting point of 867dpa results in an OAHN of 953dpa for York City for the 2012-2032 period. However, as noted above, the Council has inserted an ‘Introduction and Context to Objective Assessment of Housing Need’ to the front of the Assessment Update which contests the need for any adjustment to the 2014-based SNHP figure.
- 3.57 It notes that Members of the Council’s Executive at the meeting on 13th July 2017 resolved that on the basis of the housing analysis set out in paragraphs 82 - 92 of the Executive Report, the increased figure of 867dpa.

4.0 Critique of the SHMA Update

Introduction

- 4.1 The Companies have serious concerns and wish to raise strong objections to the way in which the Council has chosen to identify an OAHN of 867dpa and the subsequent identification of this need as the housing requirement in Policy SS1 of the LPP. As noted above, the ‘Introduction and Context to Objective Assessment of Housing Need’ (inserted by the Council at the front of the SHMA Update Assessment) states [page 2]:

“Members of the Council’s Executive at the meeting on 13th July 2017 resolved that on the basis of the housing analysis set out in paragraphs 82 - 92 of the Executive Report, the increased figure of 867 dwellings per annum, based on the latest revised sub national population and household projections published by the Office for National Statistics and the Department of Communities and Local Government, be accepted.”

“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 for market signals (to 953 dwellings per annum), 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.”

- 4.2 This is effectively a ‘policy-on’ intervention by the Council which should not be applied to the OAHN. It has been confirmed in the Courts that OAHN is ‘policy off’ and does not take into account supply pressures. The judgment of Hickinbottom J in Solihull sets out the definition of OAHN [§37]:

“Full Objective Assessment of Need for Housing: This is the objectively assessed need for housing in an area, leaving aside policy considerations (Lichfields emphasis). It is therefore closely linked to the relevant household projection; but is not necessarily the same. An objective assessment of housing need may result in a different figure from that based on purely demographics if, e.g., the assessor considers that the household projection fails properly to take into account the effects of a major downturn (or upturn) in the economy that will affect future housing needs in an area. Nevertheless, where there are no such factors, objective assessment of need may be – and sometimes is – taken as being the same as the relevant household projection.”

- 4.3 With regard to this matter, the SHMA Assessment Update [§§5.8-5.9] clearly states:

“The official projections should be seen a starting point only and housing delivery at this level (867dpa) would only meet the demographic growth of the City. It would not however address the City’s affordability issues.”

“Without the 10% uplift for market signals/affordable housing need the City’s younger population would fail to form properly. This would result in greater numbers residing with parents or friends or in share accommodations such as HMOs.”

- 4.4 GL Hearn is therefore clear that the 867dpa figure is not an appropriate OAHN. On one level, it is the incorrect demographic starting point in any case, which according to GL Hearn’s work is 871dpa following suitable adjustments to the 2014-based SNHP to incorporate the 2015 MYE and accelerated household formation rates. On the second level, there is an array of evidence, which we examine in further detail below, that York City is one of the least affordable local authority areas in Northern England. A market signals uplift of 10% is the very least that would

be appropriate, and indeed we provide evidence that suggests that an even higher uplift, of 20% should actually be applied.

- 4.5 It is therefore not acceptable for the Council to ignore its own housing expert's advice. The Council's approach to identifying an OAHN of 867dpa, as set out in the front section of the SHMA Assessment Update, is policy-on driven and is therefore contrary to the guidance provided by the Courts. The calculation of OAHN should be based on the normal 'policy-off' methodology.
- 4.6 Notwithstanding these points, the remainder of this section provides a detailed critique of GL Hearn's SHMA Assessment Update.

Starting Point and Demographic-led Needs

Population Change

- 4.7 The Practice Guidance³⁰ sets out that in assessing demographic-led housing needs, the CLG Household Projections form the overall starting point for the estimate of housing need, but these may require adjustments to reflect future changes and local demographic factors which are not captured within the projections, given projections are trend based. In addition, it states that account should also be taken of ONS' latest Mid-Year Estimates [MYEs]³¹.
- 4.8 The SHMA Assessment Update applies the 2014-based SNPP which projects an increase in population of around 31,400 people (15.7%) in York. This is higher than the 2012-based SNPP (12.2%) and also higher than the main SHMA projection (which had population growth of 13.7%). It also considers longer term migration trend using the latest available evidence from the 2014-SNPP and the 2015 Mid-Year Estimate.
- 4.9 The SHMA Assessment Update considers housing need based on the (then) latest CLG 2014-based household projections over the period 2012 to 2032.
- 4.10 The Companies agree with the overall principle of taking the 2014-based SNPP as the demographic starting point and rebasing population growth off the latest Mid-Year Population Estimates.
- 4.11 However, it is important to note that the household projections upon which York's OAHN is based relate to C3 uses only, and not C2. Specifically, and of particular relevance to the City of York, CLG's household projections do not include an allowance for students who might be expected to reside in Halls of Residence (termed, along with people living in nursing homes, military barracks and prisons, as the 'Institutional population').
- 4.12 As summarised by CLG in its 2014-based household projections Methodological Report (July 2016), the household projections are based on the projected household population rather than the total population. The difference between the two is the population in communal establishments, also termed the 'institutional' population. This population comprises all people not living in private households and specifically excludes students living in halls of residence:
- "The institutional population is subtracted from the total resident population projections by age, sex and marital status to leave the private household population, split by sex, age and marital status in the years required for household projections."* [page 12]
- 4.13 This is important for the City of York, because it means that if the household projections are used as the basis for calculating the OAHN (which GL Hearn's methodology does), it specifically excludes a substantial proportion of specialised student accommodation needs.

³⁰ Practice Guidance - ID 2a-015-20140306

³¹ Practice Guidance - ID 2a-017-20140306

Household Formation Rates

4.14 The Practice Guidance³² indicates that in respect of household projections:

“The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice...”

“...The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demographic and household formation which are not captured in past trends...rates may have been suppressed historically by under-supply and worsening affordability of housing...”

4.15 The SHMA Assessment Update notes that there is no material difference 2014-based SNHP headship rates and the household formation rates from the 2012-based version.

4.16 The SHMA [§2.19] accepts that there has been a level of suppressed household formation arising from the 25-34 age group and in relation to this matter states [§§5.3-5.4]:

“Furthermore there is also the clear desire of the Government to boost housing delivery, and therefore setting an OAN that is below the most recent official projections while justifiable might be difficult to support.”

“There is however an apparent continued suppression of household formation rates within younger age groups within the official projections. In order to respond to this we have increased the household formation rates in this age group to the levels seen in 2001. The housing need (when linked to 2014-based projections) increases to 873 dwellings per annum. When the mid-year estimates are included the housing need decreases to 871 dpa. This should be seen as the demographic conclusions of this report.”

4.17 GL Hearn clearly accepts that an increase in household formation rates is necessary to respond to continued suppression of household formation rates within younger age groups within the official projections. We agree with this. However this adjusted demographic figure of 871dpa does not appear to have been carried forward by GL Hearn in calculating the resultant housing need, as noted below.

4.18 Lichfields agrees with making an adjustment for demographic and household formation rates. However, it is illogical to revert back to unadjusted projections of 867 dpa and then take this to apply the adjustment for market signals and affordable housing, when an adjusted demographic need of 871dpa has been identified.

Market Signals

4.19 The Framework sets out the central land-use planning principles that should underpin both plan-making and decision-taking. It outlines twelve core principles of planning that should be taken account of, including the role of market signals in effectively informing planning decisions:

“Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.” [S17]

4.20 The Practice Guidance³³ requires that the housing need figure as derived by the household

³² Practice Guidance - ID 2a-015-20140306

³³ Practice Guidance - ID 2a-019-20140306

projections be adjusted to take into account market signals. It indicates that comparisons should be made against the national average, the housing market area and other similar areas, in terms of both absolute levels and rates of change. Worsening trends in any market signal would justify an uplift on the demographic-led needs. In addition, the Practice Guidance³⁴ highlights the need to look at longer terms trends and the potentially volatility in some indicators.

4.21 The Practice Guidance also sets out that:

“...plan-makers should not attempt to estimate the precise impact of an increase...rather they should increase planning supply by an amount that, on reasonable assumptions...could be expected to improve affordability...”³⁵.

4.22 This clearly distinguishes between the demographic-led need for housing (generated by population and household growth) and the market signals uplift which is primarily a supply response over and above the level of demographic need to help address negatively performing market signals, such as worsening affordability.

4.23 The SHMA Assessment Update (Section 3) examines a range of market signals as set out in the Practice Guidance, comparing the City of York to Ryedale, Hambleton, Yorkshire and the Humber region and England. It states that the update is a targeted update to the market signals section looking using recently published data, not a full update, as many of the datasets used have not been updated since publication of the SHMA. Attached at Appendix 1 is Lichfields’ own assessment of market signals in City of York which has been used for comparison purposes.

4.24 The findings of the SHMA Assessment Update can be summarised (with Lichfields’ commentary included) as follows:

- 1 **Land Prices** – No analysis has been presented, as was the position on the 2016 SHMA. As noted in our market signals assessment in Appendix 1, CLG land value estimates suggest a figure of £2,469,000 per hectare, well above the equivalent figure for England (excluding London) of £1,958,000.
- 2 **House Prices** – The 2016 SHMA outlined significant house price growth in the HMA between 2011 and 2007. By Q4 2014 house prices in York had reached £195,000 and by Q2 2016 this had increased to £225,000. The Assessment Update notes that, based on 2016 data, the average (median) house price in York was £215,000, compared to £148,000 across the Yorkshire and Humber region. Our market signals analysis in Appendix 1 suggests that the average (median) house price in York in 2016 was £220,000 compared to £199,995 for the North Yorkshire region. It is particularly important to note that over the previous 17 years (1999-2016), median house prices have increased by 244% (or £156,000) in York, compared to 204% nationally and 199% across North Yorkshire as a whole.

As set out in the Practice Guidance, higher house prices and long term, sustained increases can indicate an imbalance between the demand for housing and its supply. The fact that York’s median house prices have effectively tripled in 17 years, from £64,000 in 1999 to £220,000 in 2016, and have risen at a much faster rate than comparable national and sub-regional figures, suggests that the local market is experiencing considerable levels of stress.

- 3 **Rents** – The Assessment Update [§3.8] notes that the most recent data shows that England has grown to £650 (+8%), while York has seen median rental prices increase to £700 (+4%). In contrast rents in the region only grew by 1% to £500 per month. The Assessment Update [§3.9] finds that the most recent data shows a strong upward trend in the number of rental transactions in York although they have been falling over the last six months. In York rental transactions are currently 73% higher than in September 2011, showing a

³⁴ Practice Guidance - ID 2a-020-20140306

³⁵ *ibid*

continued return to the longer term trend than seen in the previous SHMA. By comparison, in Yorkshire and the Humber rental volumes are still slightly above (6%) past figures. Nationally, over this period there has been a slight downward trend.

Our market signals analysis in Appendix 1 shows that Median rents in York are £725 per month, with median rents ranging from £595 per month for a 1 bed flat, to £1,500 per month for a 4+ bed house. All of these figures are significantly higher than the national average, with overall average rents comprising £675 across England, and £585 for North Yorkshire. Rental levels are therefore 7.4% higher than comparable national figures. High and increasing private sector rents in an area can be a further signal of stress in the housing market.

- 4 **Affordability** – The Assessment Update [§3.10] acknowledges the affordability issues faced within the HMA with the Median Ratio being 8.3 times earnings in 2015 (compared to 7.6 nationally), whilst the Lower Quartile [LQ] ratio is 8.9 times earnings (compared to 7.0 nationally). However, it does not discuss this stark indicator of supply/demand imbalance, preferring to note instead that much of the growth in (un)affordability took place prior to 2005, with limited changes to affordability in the past decade[§3.11].

Lichfields' market signals analysis in Appendix 1 shows that although the ratio fell substantially from a peak of 8.14 in 2008 following the financial crash and subsequent economic downturn, it has steadily increased since 2009 at a much faster rate than North Yorkshire as a whole. This suggests that levels of affordability are declining in York at a pace which is not the case for the rest of the sub-region (and indeed, for the country as a whole). In 2016, the median house price in York City was approximately 9.0-times the LQ workplace-based income, compared to 7.8 for North Yorkshire and 7.2 nationally.

Our analysis shows the over the past 19 years, the ratio of lower quartile house prices to lower quartile earnings in York has been consistently above the national average, with the gap widening over time. Indeed, the rate of increase is worrying – between 2002 and 2016, the affordability ratio increased by 39%, significantly above the comparable growth rate for North Yorkshire (+27%) and England (+37%).

The affordability ratio highlights a constraint on people being able to access housing in York, with house price increases and rental costs outstripping increases in earnings at a rate well above the national level.

- 5 **Rates of Development** – the Practice Guidance is clear that historic rates of development should be benchmarked against the planned level of supply over a meaningful period. The Assessment Update [§3.13] examines housing completions data for York dating back to 2004/05 and sets these against the annual housing target from 2004/05 to 2015/16. With the exception of the last year, housing delivery in York has missed the target each year since 2007. Overall delivery targets for these years was missed by 20% which equals 2,051 units below the target level. GL Hearn notes [§3.14] that under-delivery may have led to household formation (particularly of younger households) being constrained and states that this point is picked up in the report which uses a demographic projection based analysis to establish the level of housing need moving forward.

The Assessment Update [§3.15] considers that this past under-delivery is not a discrete part of the analysis but is one of the various market signals which indicate a need to increase provision from that determined in a baseline demographic projection. It notes that that this market signal will require upward adjustment through consideration of migration and household formation rates rather than just a blanket increase based on the level of 'shortfall'.

It is clear from the Council's own evidence that the City has consistently under-delivered housing, with a failure to deliver anything more than 525 dwellings in any single year between 2007 and 2015. The policy benchmarks suggest that the level of past under-

delivery is 1,793 dwellings over the past 12 years. Furthermore, the Council's already low housing delivery figures have been artificially boosted by the inclusion of student accommodation in the completions figures. For example, CYC's 2012/13 Annual Monitoring Report states that 482 (net) dwellings were completed in 2012/13, but this figure includes 124 student cluster flats. The 6 months completions data set out in CYC's Housing Monitoring Update (Table 3, October 2017) suggested that the Council was continuing to rely on student housing completions to boost its housing numbers, with 637 of the total 1,036 net completions during the first half of the 2017/18 monitoring year comprising privately managed off-campus student accommodation.

- 6 **Overcrowding** - No analysis has been presented. Our market signals analysis in Appendix 1 shows overcrowding against the occupancy rating in York is not severe, with 7.10% of households living in a dwelling that is too small for their household size and composition. This compares to 8.7% nationally. However, it represents a significant increase of 2 percentage points on the 5.1% recorded in York in 2001, which is above the national trend (which had increased by 1.6 percentage points from 7.1% in 2011). From our analysis we also note that when compared against neighbouring Yorkshire districts, York is the worst performing district regarding the rate of change in overcrowded households.

4.25 In response to both market signals and affordable housing need, the Assessment Update advocates a 10% uplift to the OAN [§3.31].

4.26 Lichfields agrees that based on the market signals analysis there are clear housing market pressures, particularly regarding affordability within the HMA. The Practice Guidance³⁶ is clear that any market signals uplift should be added to the demographic-led *needs* as an additional *supply* response which could help improve affordability, and further goes on to clarify that:

"...plan makers should not attempt to estimate the precise impact of an increase in housing supply. Rather they should increase planned supply by an amount that, on reasonable assumptions...could be expected to improve affordability..." (Lichfields emphasis)

4.27 The Practice Guidance³⁷ is also clear that:

"...the more significant the affordability constraints...and the stronger the other indicators of high demand... the larger the improvement in affordability needed and, therefore the larger the additional supply response should be."

4.28 Whilst it is not clear cut from the Practice Guidance how an upwards adjustment should be calculated, some recent Local Plan Inspector's findings have provided an indication as to what might be an appropriate uplift. The Inspector's Report into the Eastleigh Borough Local Plan (11th February 2015)³⁸ provide interpretation of the Practice Guidance in terms of a reasonable uplift on demographic-led needs in light of market signals:

"It is very difficult to judge the appropriate scale of such an uplift. I consider a cautious approach is reasonable bearing in mind that any practical benefit is likely to be very limited because Eastleigh is only a part of a much larger HMA. Exploration of an uplift of, say, 10% would be compatible with the "modest" pressure of market signals recognised in the SHMA itself." [§§40-41].

4.29 The Eastleigh Inspector ultimately concluded that a modest uplift of 10% is a reasonable proxy for quantifying an increase from purely demographic based needs to take account of 'modest' negatively performing market signals. Furthermore, Inspectors have used figures of up to 20% for 'more than modest' market signal indicators, notably in the case of Canterbury, where the

³⁶ Practice Guidance - ID:2a-020-20140306

³⁷ Practice Guidance - ID:2a-020-20140306

³⁸ http://www.eastleigh.gov.uk/pdf/ppi_Inspectorsreport12Feb15.pdf

Inspector concluded that:

“Taking these factors in the round it seems to me that 803dpa would achieve an uplift that took reasonable account of market signals, economic factors, a return to higher rates of household formation and affordable housing needs.”³⁹

4.30 From the indicators set out by Lichfields in Appendix 1, as shown in Table 4.1, and from the commentary and analysis undertaken by GL Hearn, we consider that the current levels of market stress should be considered more severe than the ‘modest’ uplift the SHMA suggests. An application of other approaches (discussed above) would suggest an uplift of 20% could be appropriate for the City of York.

4.31 Drawing together the individual market signals above begins to build a picture of the current housing market in and around York; the extent to which demand for housing is not being met; and, the adverse outcomes that are occurring because of this. The performance of York against County and national comparators for each market signal is summarised in Table 4.1. When quantified, York has performed worse in market signals relating to both absolute levels and rates of change against North Yorkshire and England in 13 out of 28 measures.

Table 4.1 Summary of York Market Signals against North Yorkshire and England

Market Signal	North Yorkshire		England	
	Absolute Figure	Rate of Change	Absolute Figure	Rate of Change
House Prices	Worse	Worse	Better	Worse
Affordability Ratios	Worse	Worse	Worse	Worse
Private Rents	Worse	Worse	Worse	Better
Past Development	~	~	~	~
Homelessness (Households in Temporary Accommodation)	Better	Better	Better	Better
Homelessness (Households in Priority Need)	Better	Better	Better	Better
Overcrowding (Overcrowded Households)	Worse	Worse	Better	Worse
Overcrowding (Concealed Families)	Same	Same	Better	Better

Source: Lichfields Analysis

Footnote: Worse = performing worse against the average
 Better = performing the same or better against the average
 ~ = data not available

4.32 It is clear that the City is currently facing very significant challenges in terms of house prices and private rental values and under delivery, causing affordability difficulties. The GL Hearn analysis is an improvement from the 2016 SHMA and clearly is an improvement from the Council’s approach to identifying an OAHN of 867dpa, but even so, is inadequate to address the current housing crisis. For the aforementioned reasons a 20% uplift is preferable.

4.33 Whilst it can only be applied limited weight at the current time, Lichfields also note that the CLG methodology, based on the median workplace based affordability ratio, would suggest an uplift of 27% for market signals.

4.34 GL Hearn also conflates market signals and affordable housing in the 10% uplift, which is a fundamental misreading of the Practice Guidance, and should be addressed separately (see below for affordable housing commentary).

³⁹Canterbury District Council Local Plan Examination August 2015, Inspector’s Letter and Note on main outcomes of Stage 1 Hearings, paragraph 26.

Economic Growth

- 4.35 With regards to considering the need to uplift a housing figure to take account of the economic potential of the local authority, the Framework sets out the following:

“The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.” [S19]

- 4.36 The SHMA Assessment Update presents no alternative to the work in the June 2016 SHMA. It states [S4.3] that the housing need required to meet the economic growth is lower than the demographic need. Furthermore evidence of more recent forecasts suggests that the economic growth will be even lower than anticipated. Therefore GL Hearn considers that on balance, there is unlikely to be any justification for an uplift to housing numbers in the City to support expected growth in employment. The Update states that the uplift for market signals would see the likelihood for an economic uplift reduce.

- 4.37 Lichfields considers that this approach fails to address the concerns raised in our previous submissions on behalf of the Companies to the Preferred Sites Consultation. Included in those submissions was ‘Technical Report 1’ which noted that June 2016 SHMA presents a suppressed picture of likely economic growth, drawing upon economic forecasts produced in 2014, which are outdated. The submission noted that we could only provide a limited analysis on the robustness of GL Hearn’s assessment of the implications of the job forecasts as they had not set out their assumptions in detail, and we reserved the right to review these assumptions if/when they were provided by GL Hearn.

- 4.38 Given that the SHMA Assessment Update provides no further information on this matter it has not been possible for Lichfields to make any further analysis at this stage. On this basis, the concerns raised on behalf of the Companies in Technical Report 1 still stand, particularly as the LPP Policy SS1 identifies a specific target to provide sufficient land to accommodate an annual provision of around 650 new jobs to support sustainable economic growth.

Affordable Housing Needs

- 4.39 In line with the Framework⁴⁰, LPAs should:

“...use their evidence based to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing...”

“...prepare a SHMA which...addresses the need for all types of housing, including affordable.”

- 4.40 The Practice Guidance⁴¹ sets out a staged approach to identifying affordable housing needs, and states that affordable housing need should be:

“...considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments...an increase in the total housing figures included in the plan should be considered where it could help deliver the required number of affordable homes.”

- 4.41 As set out in Section 2.0, two High Court Judgements go to the heart of addressing affordable housing within the identification of OAHN. ‘Satnam’ establishes that affordable housing needs are a component part of OAHN, indicating that the ‘proper exercise’ is to identify the full

⁴⁰ Framework - Paragraphs 47 and 159

⁴¹ Practice Guidance - ID: 2a-022-20140306 to 2a-029-20140306

affordable housing needs and then ensure that this is considered in the context of its likely delivery as a proportion of mixed market/affordable housing development. ‘Kings Lynn’ builds on ‘Satnam’, identifying that affordable housing needs “*should have an important influence increasing the derived OAHN since they are significant factors in providing for housing needs within an area.*” [§36] This is clear that affordable housing needs are a substantive and highly material driver of any conclusion on full OAHN.

4.42 The SHMA Assessment Update states that it does not review affordable housing need but the situation is unlikely to have changed significantly from the 2016 SHMA. The 2016 SHMA identified a net affordable housing need of 573 homes per annum or 12,033 dwellings over the 2012-2033 period. This suggests a worsening situation when compared with the previous figure of 486 affordable homes per annum needed in the previous 2011 SHMA, produced by GVA.

4.43 The SHMA Assessment Update [§3.3] suggests that large parts of this need are either existing households (who do not generate need for additional dwellings overall) or newly forming households (who are already included within the demographic modelling).

4.44 It further states [§§3.17-3.18] that:

“The City of York Council currently have an affordable housing policy of up to 30%. The SHMA identified a net affordable housing need of 573 dwellings. Based on this level of need and the current policy the City would require to deliver 1,910 dwellings per annum. To put this in context the City has only delivered more than 1000 homes once since 2004-5. Using a lower policy target would result in an even higher need.”

“While there is clearly an affordable housing issue in the City many of the households in need are already in housing (just housing that is not suitable for some reason such as overcrowding) and therefore do not generate a need for additional dwellings”.

4.45 The provision of the net affordable housing need identified is likely to be unrealistic given past dwelling completions in City of York. With regard to this matter the SHMA Assessment Update states [§3.28]:

“Given the balance of judgement it would appear that a 10% adjustment could be justified in York on the basis of the previously established affordable housing need the updated market signals evidence.”

4.46 In taking this approach, GL Hearn is effectively conflating the uplift resulting from affordable housing need with uplift resulting from market signals analysis. These are two separate steps in the Practice Guidance and should not be combined in this manner.

4.47 Lichfields has not analysed in detail the figures forming the assessment of affordable housing needs, due in part to limitations on access to the underlying data; instead, Lichfields has focused on how this need has informed the OAHN conclusion.

Addressing Affordable Housing Needs

4.48 Having identified the affordable housing needs, the Practice Guidance requires an assessment of its likely delivery to consider whether there is a need to uplift or adjust the OAHN and planned housing supply in order to address affordable housing needs. This is what the ‘Satnam’ judgment calls the ‘proper exercise’ and is undertaken by the 2016 SHMA within Figure 30. This concludes that to meet affordable housing need in full the City of York would need to deliver 573dpa. At a delivery rate of 30% of overall housing, this means that the City would need to deliver 1,910dpa to address affordable housing needs in full.

4.49 Taking into account affordable need within the calculation of OAHN does not necessarily involve a mechanistic uplift, or an indication that such identified needs must be met in full. It

has to be a scenario which, on a reasonable basis, could be expected to occur. This is set out in the Kings Lynn judgment which concluded:

"...This is no doubt because in practice very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice. That is because the vast majority of delivery will occur as a proportion of open-market schemes and is therefore dependent for its delivery upon market housing being developed." [§35]

This is also consistent with the Practice Guidance⁴² which sets out the assessment of need "does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur."

- 4.50 However, in line with the High Court Judgments, this still needs to be an uplift of consequence, insofar as it can reasonably be expected to occur. This will inevitably need to involve judgement, based on relevant evidence, as to the extent to which any scale of uplift could be reasonably expected to occur.
- 4.51 The SHMA ultimately does not use the identified acute affordable housing needs in a way in which it has "an important influence in increasing the derived F[ull] OAN" as per the Kings Lynn judgment.
- 4.52 The Local Plan Expert Group [LPEG], in its Report to the Secretary of State for Communities and Local Government in March 2016, recommended various changes to the Practice Guidance with the remit of considering how local plan-making could be made more efficient and effective. Although very limited weight can be given to the LPEG approach given that it is not policy or endorsed by Government, it is at least helpful in seeking to understand the general 'direction of travel' of defining OAHN and what an appropriate response might be to define the influence of market signals and affordable housing needs. LPEG recommended changes to the preparation of SHMAs and determination of OAHN.
- 4.53 With regard to affordable housing need in the preparation of SHMAs and determination of OAHN it proposed that where the total number of homes that would be necessary to meet affordable housing need is greater than the adjusted demographic-led OAHN, then this figure (953dpa) should be uplifted by a further 10%. The 10% uplift was intended to provide a streamline approach that removes judgement and debate from the process of setting OAHN (as opposed to what might be the most accurate under current Practice Guidance).
- 4.54 Given the significant affordable housing need identified in City of York Lichfields considers that this 10% uplift would be appropriate in this instance and should be applied to the OAHN.

MHCLG Standardised Approach to OAHN

- 4.55 As noted in Section 2, MHCLG has recently published for consultation the draft Planning Practice Guidance, which sets out the standard method for calculating local housing need, including transitional arrangements first set out in "Planning for the right homes in the Right Places" ..
- 4.56 Whilst relatively limited weight can be attached to this document at present given its consultation status, for the City of York, if adopted as MHCLG proposes, the approach would mean that the OAHN over the period 2016-2026 is 1,070 dpa.
- 4.57 This is based on an annual average level of household growth of 844 dpa between 2016 and 2026, uplifted by a very substantial 27% to address the fact that the latest median workplace-based affordability ratio is 8.3.

⁴² Practice Guidance - ID:2a-003-20140306

Conclusions on the City of York's Housing Need

- 4.58 The Council's approach to identifying an assessed need of 867 dpa in the introductory section of the SHMA Assessment Update is fundamentally flawed. This is a 'policy-on' intervention by the Council which should not be applied to the OAHN. It has been confirmed in the Courts that FOAN is 'policy off' and does not take into account supply pressures. The Council's approach to identifying the FOAN, as set out in the SHMA Assessment Update, would therefore be susceptible to legal challenge. The calculation of OAHN should therefore be based on the normal 'policy-off' methodology.
- 4.59 There are a number of significant deficiencies in the SHMA Assessment Update which means that even the higher 953 dpa OAHN figure identified in the Assessment Update is not soundly based. In particular:
- 1 GL Hearn clearly accepts that an increase in household formation rates is necessary to respond to continued suppression of household formation rates within younger age groups within the official projections. However this demographic conclusion of 871 dpa does not appear to have been carried forward by GL Hearn in calculating the resultant housing need, as noted below. Lichfields agree with making an adjustment for demographic and household formation rates. However, it is illogical to revert back to unadjusted projections of 867 dpa and then take this to apply the adjustment for market signals and affordable housing, when a demographic need of 871 dpa has been identified.
 - 2 The Assessment Update fails to distinguish between the affordable housing needs of the City of York and the supply increase needed to address market signals to help address demand. Instead the SHMA blends the two elements within the same figure resulting in a conflated figure which is lower than the level of uplift deemed reasonable by the Eastleigh and Canterbury Inspectors, despite the fact that market signals pressures in York indicate signs of considerable stress and unaffordability. The Practice Guidance is clear that the worse affordability issues, the larger the additional supply response should be to help address these.
 - 3 Given the significant affordable housing need identified in City of York Lichfields consider that a 20% uplift would be appropriate in this instance and should be applied to the OAHN.
- 4.60 The scale of objectively assessed need is a judgement and the different scenarios and outcomes set out within this report provide alternative levels of housing growth for the City of York. Lichfields considers these to be as follows:
- 1 **Demographic Baseline:** The 2014-based household projections indicate a net household growth of 867dpa between 2014 and 2024 (including a suitable allowance for vacant/second homes. Once a suitable adjustment has been made to rebase the projections to the (slightly lower) 2015 MYE, and through the application of accelerated headship rates amongst younger age cohorts takes the demographic starting point to 871 dpa.
 - 2 **Market Signals Adjustment:** GL Hearn's uplift is 10%. However, for the reasons set out above, Lichfields considers that a greater uplift of 20% would be more appropriate in this instance. When applied to the 871 dpa re-based demographic starting point, this would indicate a need for 1,045 dpa.
- The demographic-based projections would support a reasonable level of employment growth at levels above that forecast by Experian, past trends or the Blended job growth approach. As such, no upward adjustment is required to the demographic-based housing need figures to ensure that the needs of the local economy can be met;
- The scale of affordable housing needs, when considered as a proportion of market housing delivery, implies higher levels of need over and above the 1,045 dpa set out above. It is considered that to meet affordable housing needs in full (573 dpa), the OAHN range should be adjusted to 1,910 dpa @30% of overall delivery. It is, however, recognised that this level

of delivery is likely to be unachievable for York. Given the significant affordable housing need identified in City of York Lichfields consider that a further 10% uplift would be appropriate in this instance and should be applied to the OAHN, resulting in a final figure of **1,150 dpa**.

This is **7.5% higher** than the MHCLG proposed standardised methodology figure of 1,070 dpa.

- 4.61 This allows for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth. Using this range would ensure compliance with the Framework by significantly boosting the supply of housing. It would also reflect the Framework, which seeks to ensure the planning system does everything it can to support sustainable development.
- 4.62 It is emphasised again that CLG's household projections explicitly exclude the housing needs of students living in halls of residence. GL Hearn has used the latest CLG 2014-based household projections to underpin its housing OAN for York. The market signals adjustment it makes does not address the separate specialised housing needs of students, which would be additional to the target identified.

5.0 **Approach to Assessing Housing Land Supply**

Introduction

- 5.1 This section sets out the requirements of the Framework and the Practice Guidance in establishing the supply of housing land to meet the housing needs of an area. This will provide the benchmark against which the SHLAA and emerging Local Plan will be assessed, to ensure the necessary requirements are met. In addition, relevant High Court judgments have been referenced to set out the requirements of a housing supply calculation in a legal context.

Policy Context

National Planning Policy Framework

- 5.2 The Framework outlines a two-step approach to setting housing requirements in Local Plans. Firstly, to define the full objectively assessed need for development and then secondly, to set this against any adverse impacts or constraints which would mean that need might not be met. This is enshrined in the approach defined in the Framework⁴³ which sets out the presumption in favour of sustainable development.

- 5.3 The Framework⁴⁴ stresses the intention of the Government to significantly boost the supply of housing. As a consequence, the focus of national policy is to ensure the delivery of housing and, in that context, the Framework requires LPAs to:

"identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;

identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15..."⁴⁵

- 5.4 There is therefore a need for the Council to identify both a 5-year supply and a longer-term supply as part of the preparation of the Local Plan.

- 5.5 For the purpose of the supply assessment, the Framework advises that only deliverable sites should be included within the first 5-years. To be considered deliverable:

"...sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing

⁴³ Framework - §14

⁴⁴ Framework - §47

⁴⁵ Framework - §47

plans.”⁴⁶

- 5.6 The Framework states that for the period 5-15 years developable sites may be included, which are sites that are:

“...in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.”⁴⁷

- 5.7 The Framework sets out the approach to defining such evidence which is required to underpin a local housing supply. It sets out that in evidencing housing supply:

“LPAs should have a clear understanding of housing needs in their area. They should:

...

“...prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.”⁴⁸

National Planning Practice Guidance

- 5.8 The Practice Guidance⁴⁹ provides further guidance on how an assessment of the housing supply is to be undertaken. It urges LPAs to assess the suitability, availability and achievability of sites, including whether the site is economically viable, to determine whether a site can be considered deliverable over the plan period.

- 5.9 In this context the Practice Guidance makes it clear that a site will be considered available when:

“...there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell. Because persons do not need to have an interest in the land to make planning applications, the existence of a planning permission does not necessarily mean that the site is available. Where potential problems have been identified, then an assessment will need to be made as to how and when they can realistically be overcome. Consideration should also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.”⁵⁰

- 5.10 The Practice Guidance indicates that a site is considered achievable for development where:

“...there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.”⁵¹

- 5.11 The LPA, when preparing a Local Plan, is urged to use the information on suitability, availability, achievability and constraints to assess the timescale within which each site is capable of development. The Practice Guidance suggests that this may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites

⁴⁶ Framework – Footnote 11

⁴⁷ Framework – Footnote 12

⁴⁸ Framework - §159

⁴⁹ Practice Guidance – ID:3-018-20140306

⁵⁰ Practice Guidance – ID:3-020-20140306

⁵¹ Practice Guidance – ID:3-021-20140306

allowance should be made for several developers to be involved. The Practice Guidance⁵² makes it clear that the advice of developers and local agents will be important in assessing lead-in times and build-out rates by year.

- 5.12 The Practice Guidance⁵³ accepts that a windfall allowance may be justified if a local planning authority has compelling evidence as set out in the Framework. In addition, it states that:

*“Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area (using the same criteria as set out in paragraph 48 of the National Planning Policy Framework).”*⁵⁴

- 5.13 The Practice Guidance requires LPAs to collate this above information and present it in an indicative trajectory which:

*“...should set out how much housing and the amount of economic development that can be provided, and at what point in the future. An overall risk assessment should be made as to whether sites will come forward as anticipated.”*⁵⁵

- 5.14 In relation to the assessment of whether sites are deliverable within the first 5-years the Practice Guidance⁵⁶ indicates that deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within 5-years. It goes on to state:

*“...planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe.”*⁵⁷

Recent Legal Judgments

- 5.15 The High Court decision in the case of Exeter City Council and Secretary of State⁵⁸ is relevant to York as it considers the appropriateness of including student accommodation in the calculation of the housing supply in accordance with the Framework. Exeter is a University City similar to York and included student accommodation within their housing land supply.

- 5.16 The Inspector who determined the appeal⁵⁹ considered the inclusion of student accommodation in the 5-year supply based on the Practice Guidance which states:

*“All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Notwithstanding, local authorities should take steps to avoid double counting.”*⁶⁰

⁵² Practice Guidance – ID:3-023-20140306

⁵³ Framework - §48

⁵⁴ Practice Guidance – ID:3-024-20140306

⁵⁵ Practice Guidance – ID:3-025-20140306

⁵⁶ Practice Guidance – ID:3-031-20140306

⁵⁷ Practice Guidance – ID:3-031-20140306

⁵⁸ Exeter City Council v Secretary of State for Communities and Local Government [2015] EWHC 1663 (Admin)

⁵⁹ Land at Home Farm, Church Hill, Pinhoe – Insp. Decision 29.10.14 [Ref: APP/Y1110/A/14/2215771]

⁶⁰ Practice Guidance – ID:3-036-20140306

5.17 The Inspector, in her decision letter, stated:

“The Council submit that the provision of student accommodation releases housing that would otherwise be occupied by students and thereby indirectly releases accommodation within the housing market. For this reason it believes that all student accommodation should be included within the housing delivery and housing land supply figures. This view is not consistent with the PPG because it is not based on any assessment of the extent to which the provision of student accommodation has released general market housing.”

5.18 She went on:

“Where student population is relatively stable, and the number of general market dwellings occupied by students declines as a consequence of the provision of student accommodation, I consider the inclusion of such accommodation as part of the housing supply would be consistent with the guidance within the PPG. However, within Exeter, due to the considerable increase in the number of students relative to the provision of purpose-built student accommodation, there has not been a reduction in the number of general market dwellings occupied by students. On the contrary, there has been a significant increase...”⁶¹

5.19 The High Court agreed that the Council did not set out any specific evidence to justify that the development of student accommodation would release housing to the market elsewhere. It stated that:

“...it simply relied upon paragraph 3.38 of the PPG in support of its proposition that, irrespective of the extent (if any) that student accommodation was included in the housing requirement figure adopted.”⁶²

5.20 As a consequence, the High Court stated that the Appeal Inspector:

“... was correct not to accede to the Council’s submission that all student accommodation supplied should or could be set off against the housing requirement. She was correct not to be persuaded by the Developers’ contention that she could not under any circumstances take into account student accommodation. She was correct to look at the facts of this case and determine whether, on the evidence before her, there was any basis for taking any of the new student accommodation into account ... she properly accepted (in paragraph 47) that, although there was currently no evidence to show that the provision of student accommodation has released housing into the general market in Exeter, the situation may in the future change if (e.g.) the delivery of student accommodation significantly exceeded the increase in student population.”⁶³

Conclusion

5.21 It is against this policy context that the proposed housing supply should be considered. In practice, applying the Framework and Practice Guidance to achieve a robust supply that will meet the needs of the community is an evidence based process which should use transparent and justifiable assumptions on lead-in times, delivery rates and density. In addition, it should be clear that the sites are available and achievable over the plan period.

5.22 In the case of York, there are inherent dangers in including student housing in the supply if there is no evidence that there has been a reduction in the number of general market dwellings

⁶¹ Land at Home Farm, Church Hill, Pinhoe – Insp. Decision 29.10.14 [Ref: APP/Y1110/A/14/2215771] - §44 & §47

⁶² Exeter City Council v Secretary of State for Communities and Local Government [2015] EWHC 1663 (Admin) - §37

⁶³ Ibid - §44

occupied by students as a direct result of the provision of purpose-built student accommodation.

6.0 Council's Housing Supply Evidence

Introduction

6.1 Detailed representations on the Council's housing land supply evidence were submitted on behalf of the Companies to the City of York Local Plan - Preferred Sites Consultation (in 'Technical Report 2: Housing Supply'). These representations concluded the following:

- 1 The Council had not produced a trajectory or a detailed assessment of the 5-year supply position as required by the Framework. No evidence had therefore been produced to demonstrate the Council's housing supply position.
- 2 The assessment of the balance between the housing requirement and supply demonstrated that there was a significant shortfall for both the plan period and 5-year period. In these circumstances, the emerging plan was not 'sound' as required by the Framework, as the Council has not demonstrated an adequate short and longer-term supply as required by national guidance.
- 3 The Council should allocate additional land to meet the housing needs of the community and these sites should be able to deliver early in the plan period. This is the only approach that would deliver a 'sound' plan and enable the much needed investment in new housing to meet the community's needs.

These concerns have not been addressed and reference is accordingly made below in Lichfields' assessment of the Council's latest evidence.

6.2 Before considering the adequacy of the Council's supply, it is important to consider the nature and extent of the Council's evidence base in relation to the supply. Evidence on the Council's supply is contained in a number of different places:

- 1 The City of York Strategic Housing Land Availability Assessment [SHLAA] (September 2017);
- 2 The City of York Local Plan Publication Draft (March 2018);
- 3 Half Year Housing Monitoring Update for Monitoring Year 2017/18 (1st April 2017 and 30th September 2017); and,
- 4 The City of York Windfall Allowance Technical Paper 2017 (SHLAA Annex 5).

Housing Completions

6.3 The Council has provided detailed site by site delivery figures for the past five monitoring years (2012/13 to 2016/17). In addition, the Council's annual completion figures since 2007/08 are contained in the September 2017 Half Year Housing Monitoring Update.

6.4 The Council has included student specific accommodation within their completions figures and their forward supply figures. Based on recent High Court decisions it is clear that robust evidence must be provided to justify the inclusion of student accommodation in the housing supply, specifically that the accommodation will release housing into the general market.

6.5 York Council has not provided any evidence to demonstrate that the provision of additional student accommodation would result in the release of housing into the market as required by national policy. Furthermore, the Council's June 2016 SHMA outlines that the York St John University is, over the next five years, seeking to "*grow our student numbers from 6,400 to 7,300*"⁶⁴. This reflects an aim to achieve growth in student numbers of 14.1% by 2020.

⁶⁴ City of York, June 2016 Strategic Housing Market Assessment, §10.71

- 6.6 Based on national policy, the recent High Court decision coupled with the expected growth in student numbers in York, it is considered that it is inappropriate to include student accommodation within the Council's supply. This is because there is no justification regarding how it will result in the release of current housing into the general housing market.
- 6.7 In this context, the Council has included the delivery of 124 units in monitoring year 2012/13 from the site at 6-18 Hull Road. However, a total of 97 of the units are not self-contained and share communal/living areas. As such, these bedspaces cannot contribute towards the Council's housing completion figures as there is no evidence that they have released housing to the general market. That said, we have included the delivery of 27 units from this site as they are self-contained studio apartments which could be sold on the open market at some stage in the future.
- 6.8 The Council has also included the delivery of 91 units in the monitoring year 2016/17 for the site at Hallfield Road. The majority of the units on this scheme are not self-contained and share communal/living areas. As such, these bedspaces cannot also contribute towards the Council's housing completion figures as there is no evidence that they have released housing to the general market. However approximately 9% of these units are studio apartments which could be sold on the open market at some stage in the future, so we have included 8 units from this scheme on this basis.
- 6.9 Table 6.1 sets out the Council's past completion figure and provides a cumulative running total since 2012/13. It also sets out Lichfields' assumed completions figures and provides a running total.

Table 6.1 Housing Completions

Year	Council Position		Lichfields' Position	
	Comp.	Cum +/-	Comp.	Cum +/-
2012/13	482	482	385	385
2013/14	345	827	345	730
2014/15	507	1,334	507	1,237
2015/16	1,121	2,455	1,121	2,358
2016/17	977	3,432	894	3,252
Totals	3,432		3,252	

Source: City of York Council

2017 SHLAA

- 6.10 The Framework⁶⁵ sets out that local planning authorities should prepare a SHLAA to establish assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. Furthermore, the Practice Guidance⁶⁶ outlines that the assessment of land availability is an important step in the preparation of Local Plans. The provision of an up to date SHLAA approach ensures that all land is assessed together as part of plan preparation to identify which sites or broad locations are the most suitable and deliverable for a particular use.
- 6.11 The Council has published its City of York Strategic Housing Land Availability Assessment

⁶⁵ Framework - §159⁶⁶ Practice Guidance - ID: 12-018-20140306

September 2017. This document supersedes previous versions of the SHLAA to present the sites assessed for their development potential to form part of the evidence base for York's Local Plan. The 2017 SHLAA accompanied the Local Plan Pre Publication [LPPP] Draft, setting out the methodology for site selection in the plan, and detail of which sites have been allocated.

Site Selection

- 6.12 The 2017 SHLAA outlines the previous consultation undertaken by City of York Council in relation to site identification and consultation/engagement. It states [§2.3.1] that a two stage suitability process was undertaken in order to sieve out the potential sites most suitable for development:
- 1 Stage 1: Sustainable Location Assessment which uses the shapers set out in the emerging Spatial Strategy to assess potential site suitability. The SHLAA states that the methodology was also informed by work on the Sustainability Appraisal.
 - 2 Stage 2: Technical Officer Group which considers more site specific suitability of sites which successfully passed Stage 1 and determined whether they should progress as development sites. The SHLAA states that any sites which were wholly or partly removed from the site selection process following the Stage 1 analysis will be given the opportunity to respond to the assessment with supporting evidence.
- 6.13 Further details on the scoring process and methodology used are provided in Annex 3 of the SHLAA. As the site selection and criteria assessment process was developed in 2013, the SHLAA indicates that subsequent guidance on Impact Risk Zones for SSSIs, Flood Risk and Agricultural Land Value has been taken into consideration. It also explains the basis on which the availability and deliverability of sites has been determined.
- 6.14 The SHLAA [§§2.5.1-2.5.2] outlines how the availability of sites has been determined. It states:
- “The majority of sites assessed were received through the Call for Sites process or subsequent Local Plan consultations. Through this process we asked that landowner details were provided to us to ensure that we could confirm availability and that the site had a willing landowner. We also asked for details of whether the site had been promoted commercially or by an agent as well as when the site would be become available for development. Since 2012, the availability of sites has been reconfirmed through consultation.”*
- “For the allocated sites set out in the Section 3.3, availability of the site has been confirmed and the timescales reflect our understanding of when the site will be brought forward in the plan period”.*
- 6.15 The SHLAA [Section 2.6] sets out a series of archetypes which have been used to determine the scale of potential development on sites less than 5ha (non-strategic sites). It notes that for Strategic Sites (over 5 ha) a bespoke approach is taken to reflect the site characteristics and detailed work undertaken.

Housing Supply

- 6.16 A summary of housing completions and permissions for the period April 2016 to March 2017 is provided.
- 6.17 The SHLAA identifies a windfall allowance of 169 dwellings per annum and states that windfalls will be included from year 4 of the trajectory. Included at Annex 5 of the SHLAA is City of York Local Plan Windfall Allowance Technical Paper (2017) which explains how the windfall figure has been derived.
- 6.18 The SHLAA does not provide any detailed calculation to demonstrate how a 5-year housing land

supply is achieved. This is wholly unacceptable and does not demonstrate the deliverable 5 year housing land supply as required by national guidance.

City of York Local Plan Publication Draft [LPP]

- 6.19 The Council published its LPP in February 2018 for public consultation. Policy H1 identifies the sites which have been allocated to meet the housing requirement set out in Policy SS1 over the plan period 2017/18 to 2032/33 (867dpa).
- 6.20 Table 5.1 in the LPP identifies the sites which have been allocated in the LPP and provides the estimated dwelling yield and estimated phasing for these sites (i.e. Short Term: Years 1-5, Medium Term: Years 1 -10 etc.). For those sites where the phasing extends beyond years 1-5, the anticipated delivery of the sites in each 5 year phase is not confirmed.
- 6.21 The LPP (Figure 5.1 and Table 5.2) provides housing trajectories for the period April 2017 to March 2033 (16 years) against the identified housing target of 867dpa. The LPP [5.6] states that the trajectory shows there is an adequate supply to meet the objectively assessed need throughout the plan period. However, there is a lack of detailed evidence on the supply to demonstrate this position.
- 6.22 Lichfields notes that the period March 2017 to April 2018 has been identified as Year '0', rather than Year '1', which would be the usual approach. Years 0 to 4 (rather than Years 1 to 5) is therefore the period against which the Framework requirement of achieving a 5-year supply would be assessed.
- 6.23 The information provided in the trajectories is high level. They do not provide an annual housing delivery trajectory for each site over the plan period. The Council simply provides an assumed total completion figure for all sites each year without detailed reasoning on the methodology for deriving this figure. In addition, there is a lack of evidence in the SHLAA on lead-in times and delivery rate assumptions for the Council's unimplemented permissions and draft allocations.
- 6.24 With regard to providing a rolling 5 year supply of deliverable sites the LPP [5.9] states:

"The Council accepts that there has been persistent under delivery of housing as defined in the NPPF and consequently has included enough land in the early years of the trajectory to ensure there is a 20% buffer in the 5 year supply. This land has been brought forward from later in the plan period. Progress on meeting delivery targets will be assessed through the authority monitoring report and the 20% buffer will be rolled forward within the 5 year supply until such time as the under delivery has been satisfactorily addressed. This does not mean that overall more land has been allocated in the plan, what it does mean is that the development trajectory (see Figure 5.1) ensures that in the early years of the plan additional land is available to address previous under delivery".

However, as with the SHLAA, the LPP does not provide any detailed calculation to demonstrate how the 5-year housing land supply is achieved.

- 6.25 With regard to site yield and delivery, the LPP [5.12] notes that the yield for each of the strategic sites has been established through working with site promoters to produce an individual assessment of the yield for each site. For non-strategic sites the LPP refers to the yield archetypes identified in the SHLAA [2.6.2].
- 6.26 With regard to the delivery and phasing of allocated sites the LPP [5.13-5.14] states:

"Each allocated site has been assessed for its likelihood of being delivered to ensure that we are satisfied that each site is likely to come forward for development during the plan period, although ultimately this can be dependent upon external factors such as finance

availability for house builders, mortgage availability for purchasers and the aspirations of landowners. In all cases there have been discussions with the land owner about their current plans. We have at this stage placed each allocated site within a timescale of short (1-5 years), medium (6-10 years), long term (11-15 years) or life time of the plan (1-21 years). The timescale of each site is an indication of when we think the site is likely to come forward and reflects the timescale put forward by the landowner or developer in the discussions referred to above, the requirement to develop the most sustainable sites within a settlement first and viability”.

“The phasing of sites is important for the successful delivery of the plan’s priorities and sites should only come forward in different phases if they would not prejudice the delivery of other allocated sites. For example where the construction of essential infrastructure is linked to the delivery of a package of sites, these sites will need to be brought forward in an orderly fashion to ensure the infrastructure is in place to mitigate the impacts of development”.

- 6.27 As with the SHLAA, there is a lack of evidence in the LPP on lead-in times and delivery rate assumptions for the Council’s unimplemented permissions and draft allocations. This is a flawed approach which does not meet the requirements of national guidance.

Conclusion

- 6.28 The Council has compiled and recently published housing completions figures for the past ten monitoring years as well as published detailed site by site completion figures for the past 5 years. However, the Council’s housing land supply figures do not provide an annual housing delivery trajectory for each site over the plan period. The Council simply provides an assumed total delivery figure for each site without detailed reasoning on the methodology for deriving this figure.
- 6.29 Insufficient information has also been provided on the assumptions used to derive the Council’s proposed delivery in the LPP and associated evidence base documents. There is a distinct lack of evidence on lead-in times and delivery rate assumptions for the Council’s unimplemented permissions and draft allocations.
- 6.30 Furthermore, the Council includes several student sites in its future supply, which is inappropriate, as there is no justification regarding how these developments will result in the release of housing into the general housing market as required by the Practice Guidance. In particular, no robust evidence has been provided to clearly demonstrate that there has been a reduction in the number of general market dwellings occupied by students as a direct result of the provision of purpose-built student accommodation. As a result, the Council’s land supply figures risk being severely distorted.

7.0 Housing Requirement

Introduction

- 7.1 The Framework⁶⁷ and Practice Guidance require LPAs to demonstrate a developable 5-year supply and a deliverable supply for the period 5-15 years. This requires an understanding of the relevant housing requirements for each of these time periods.
- 7.2 This Technical Report sets out a critique of the Council's OAHN and the need to increase the target to meet the needs of the local community. This section briefly sets out the relevant figures to be used for both the 5-year assessment and the plan period assessment.

Plan Period Housing Requirement

- 7.3 The Council's SHMA Assessment Update seeks to provide the evidence to justify the housing requirement for the City of York Local Plan. It sets the Plan period as 2012-2032.
- 7.4 This Technical Report sets out the flaws in the SHMA Assessment Update and the Council's approach in rejecting the 953 dpa figure recommended in the SHMA Assessment Update. It requests that the OAHN is recalculated using an appropriate methodology. Lichfields considers that the Council's SHMA makes a number of flawed assumptions and judgements and does not properly respond to the requirements of policy and guidance. As a result, the proposed OAHN set out in the SHMA is not robust and is inadequate in meeting the need and demand for housing.
- 7.5 Even so, the Council has resolved to reject the OAHN of 953 dpa set out in the SHMA update and adopt a figure of 867 dpa, based on the latest revised SNHP published by ONS and MHCLG with no adjustment for market signals or affordable housing. By way of contrast, MHCLG's standard methodology produces an OAHN figure of 1,070 dpa, significantly higher than adopted by the Council which again demonstrates the inappropriateness of the Council's approach.
- 7.6 As noted in Section 4, Lichfields considers that the OAHN for York is **at least 1,150 dpa**. To be robust however, for the purposes of this report, we have also used GL Hearn's 953 dpa OAHN figure to calculate the City's 5YHLS.

5-Year Housing Requirement

Annual Requirement

- 7.7 When calculating the 5-Year Housing Requirement the annual average requirement should be used. As there is disagreement over the appropriate OAHN with the Council preferring a housing requirement of 867 dpa rather than their own housing evidence which suggests a need for 953 dpa figure in the SHMA Update, with Lichfields recommending a yet higher figure (1,150 dpa). All three are used in this assessment.
- 7.8 We would note that whichever figure is used, it does not include the specific needs of students living in halls of residence, which would be additional as these are explicitly excluded from the CLG's household projections.

⁶⁷ Framework - §47

Under Supply

- 7.9 The Practice Guidance⁶⁸ indicates that LPAs should aim to deal with any under supply within the first 5-years of the plan period where possible. Table 7.1 sets out the net completions recorded by the Council since 1st April 2007 compared to the now withdrawn RS for Yorkshire and the Humber requirement which the Council has been using in the absence of an adopted Local Plan. Table 7.1 shows the failure of York to deliver housing to meet the needs of the community.

Table 7.1 Housing Completions 2007/08 - 2016/17

Year	Target	Comp.	+/-	Cum +/-
2007/08	650	523	-127	-127
2008/09	850	451	-399	-526
2009/10	850	507	-343	-869
2010/11	850	514	-336	-1,205
2011/12	850	321	-529	-1,734
2012/13	850	482	-368	-2,102
2013/14	850	345	-505	-2,607
2014/15	850	507	-343	-2,950
2015/16	850	1,121	+271	-2,679
2016/17	850	977	+127	-2,552
Totals	8,300	5,748	-2,552	

Source: York Housing Monitor Update for Monitoring Year 2016/17

- 7.10 The Council has produced a Half-Year Monitoring Update for 2017/18 (1st April 2017 to 30th September 2017). This indicates that net completions over this period have totalled 1,036 dwellings.
- 7.11 However, as details of the full monitoring year 2017/18 are not yet available it is not possible to include this latest dataset in the analysis.
- 7.12 Table 7.2 sets out the net completions recorded by the Council since 1st April 2012 compared to the Council's requirement and the Lichfield's target. In this context it should be noted that the Lichfield completions exclude the student accommodation (180 units) previously included in the Council's delivery figures for the reasons set out in Section 6.0. The table shows the failure of York to deliver sufficient housing to meet the emerging OAHN.

⁶⁸ Practice Guidance - ID:3-035-20140306

Table 7.2 Housing Completions

Year	Council Position				SHMA OAHN				Lichfield Position			
	Target	Comp.	+/-	Cum +/-	Target	Comp.	+/-	Cum +/-	Target	Comp.	+/-	Cum +/-
2012/13	867	482	-385	-385	953	482	-471	-471	1,150	385	-765	-765
2013/14	867	345	-522	-907	953	345	-608	-1,079	1,150	345	-805	-1,570
2014/15	867	507	-360	-1,267	953	507	-446	-1,525	1,150	507	-643	-2,213
2015/16	867	1,121	+254	-1,013	953	1,121	168	-1,357	1,150	1,121	-29	-2,242
2016/17	867	977	+110	-903	953	977	24	-1,333	1,150	894	-256	-2,498
Totals	4,335	3,432	-903		4,765	3,432	-1,333		5,750	3,252	-2,498	

Source: York Housing Monitoring Update for the Year 2016/17 / Lichfields analysis

Application of the Buffer

- 7.13 Judgements on the appropriate Framework buffer (i.e. 5% or 20%) to apply turns on whether there is a record of “*persistent under delivery*”.
- 7.14 In this case, the Council has under-delivered in 8 of the past ten years when compared to the previous housing target and the emerging Local Plan (see Tables 7.1 & 7.2). A ten year period is considered to represent an entire economic cycle and an appropriate period for considering past delivery. This results in a substantial shortfall which needs to be quickly rectified. It is therefore appropriate to apply a 20% buffer to help address the significant delivery failings. This approach aligns with the Framework⁶⁹ objective to “*boost significantly*” the supply of housing and ensure that objectively assessed housing needs are met.
- 7.15 In respect of applying the buffer, it should be applied to both the forward requirement and the under supply. This approach accords with the Framework, which suggests that the buffer should be added to the total requirement which would, inevitably, include any under delivery from earlier years. In this regard, the purpose of the buffer is to increase the supply of land; it does not change the number of houses required to be built within that period. Put simply, the buffer is not, and it does not become, part of the requirement; it is purely a given excess of land over the land supply necessary to permit the identified need for housing to be delivered.
- 7.16 There have been a number of appeal decisions supporting this approach. In particular, the appeal in Droitwich Spa⁷⁰ where the Inspector indicated that the buffer should be applied to the forward requirement and under supply. He stated:
- “It is also clear that the 20% buffer should be applied to the entire 5-year requirement (including the historic shortfall). The Council could not point to any provision in policy or previous decisions which supports the contention that the 20% should not apply to the historic shortfall...”* [§8.46]
- The Secretary of State supported this approach in his decision letter.⁷¹
- 7.17 Table 7.3 sets out respective positions in relation to the 5-year requirement.

⁶⁹ Framework - §47

⁷⁰ Land at Newland Road and Primslad Way, Droitwich Spa (SoS Decision 02.07.14 – Ref: APP/H1840/A/13/2199085)

⁷¹ *ibid* – DL §14

Table 7.3 5-Year Housing Requirement

	Council		SHMA OAHN		Lichfields	
	Calc.	Total	Calc.	Total	Calc.	Total
Policy Requirement (2017-2022)	867 dpa x 5	4,335	953 dpa x 5	4,765	1,150 dpa x 5	5,750
Under Supply (2012-2017)	4,335 – 3,432	903	4,765 – 3,432	1,333	5,750 – 3,252	2,498
Buffer at 20%	$(4,335 + 903) \times 0.2$	1,048	$(4,765 + 1,333) \times 0.2$	1,220	$(5,750 + 2,498) \times 0.2$	1,650
Total Requirement		6,286		7,318		9,898
Annual Requirement	6,286 / 5	1,257	7,318 / 5	1,464	9,898 / 5	1,980

Source: Lichfields

7.18 On this basis, the 5-year requirement ranges from **6,286** to **9,898** dwellings.

Conclusion

- 7.19 The SHMA Update sets out an OAHN for York of 953 dpa; however, the Council has ignored this figure and adopted 867dpa for the plan period. Lichfields considers that an OAHN of 1,150 dpa is more appropriate. Even this figure explicitly excludes the needs of students living in purpose-built halls of residence.
- 7.20 The appropriate plan period is for this assessment is 2012-2032. We have set out the Council's past completion data and consider that a 20% buffer is required due to the persistent under delivery of housing in the City over the past 10 years.
- 7.21 When using the Council's OAHN and factoring in backlog and an appropriate buffer it is concluded that the annual housing requirement over the next 5-years is 6,286 (1,257 dpa), rising to 7,318 (1,464 dpa) using the SHMA's OAHN. Using Lichfields' OAHN figure would result in an annual requirement of 9,898 (1,980 dpa) over the next 5-years.

8.0 Housing Land Supply

Introduction

8.1 This section assesses the adequacy of the deliverable and developable supply of housing sites to meet the requirement for the plan period and 5-year period. It draws on the information supplied by the Council in the LPP and associated evidence base.

8.2 Before considering the individual components of the supply some initial points on the assumptions made by the Council on deliverability, particularly in relation to lead-in times and delivery rates. In this context it is important to be cautious in relation to the likelihood of sites delivering and the scale of that delivery. This is because the purpose of the assessment is to provide a realistic view of whether there is sufficient land available to meet the community's need for housing. If those needs are to be met a cautious approach must be taken.

Delivery Assumptions

Lead in Times

8.3 From the information released to date by York City Council it is impossible to decipher the Council's assumed lead in times for the proposed housing allocations outlined in the LPP.

8.4 Whilst housebuilders aim to proceed with development on site as quickly as possible, lead-in times should not underestimate inherent delays in the planning process (e.g. the approval of reserved matter and discharge of planning conditions) as well as the time taken to implement development (e.g. complete land purchase, prepare detailed design for infrastructure, mobilise the statutory utilities and commence development).

8.5 Another fundamental element in calculating appropriate lead-in times is the size and scale of the site. As a generality, smaller sites can commence the delivery of units before larger sites. Larger sites often have more complex issues that need to be addressed and require significantly greater infrastructure development which must be delivered in advance of the completion of units.

8.6 Table 8.1 sets out our general methodology in terms of lead-in times. We have split the methodology by site size and stage in the planning process.

Table 8.1 Lead-in Times

Stage of Planning	0-250 units	250-500 units	500+ units
Full Planning Permission	1 Year	1.5 Years	2 Years
Outline Planning Permission	1.5 Years	2 Years	2.5 Years
Application Pending Determination	2.5 Years	3 Years	3.5 Years
No Planning Application	3 Years	3.5 Years	4 Years

Source: Lichfields

8.7 We provide a detailed breakdown in Table 8.2 to Table 8.5 of the lead-in times and the factors that have been taken into account. The tables, breakdown the lead in times for a typical site of up to 250 units. Obviously, the larger site categories would take long to come forward as given the additional complexities in relation to negotiate S.106 contributions, discharge conditions

and put in place the necessary on-site infrastructure.

- 8.8 We have incorporated a period between the grant of outline planning permission and the formulation of the scheme to allow for market assessments and board approvals. Finally, if the outline permission has been secured by a land promoter or a landowner the site would need to be marketed during this period. This period has not been included but would add between 6 months to 9 months to the delivery.
- 8.9 On the sites with no current planning application, the timetable assumes there is a willing developer/landowner who wishes to commence the preparation of an application immediately. However, this is not always the case and a draft allocation in a Local Plan does not necessarily mean the process of securing planning permission is commenced immediately.

Table 8.2 Full Planning Permission - Lead-in Times (Site up to 250 units)

Key Stages	Prep of App.	Consider App.	S.106	Site Prep.	First Comp.	Total
Full Permission						
Discharge of Pre-Commencement Conditions	3	2				5
Site Commencement				3	6	9
Overall Time to 1st Completion						14*

Source: Lichfields

Notes: * rounded down to 12 months for the purposes of calculating a delivery trajectory.

Not included time within the timetable for market assessment and board approval as it is assumed this has been completed

Table 8.3 Outline Planning Permission - lead-in Times (Site up to 250 units)

Key Stages	Prep of App.	Consider App.	S.106	Site Prep.	First Comp.	Total
Outline Permission						
Reserved Matters and Discharge of Pre-Commencement Conditions	6	4				10
Site Commencement				3	6	9
Overall Time to 1st Completion						19*

Source: Lichfields

Notes: * rounded down to 12 months for the purposes of calculating a delivery trajectory.

Not included time within the timetable for market assessment and board approval as it is assumed this has been completed

Table 8.4 Application Pending Outline Permission - Lead-in Times (Site up to 250 units)

Key Stages	Prep. of App.	Consider App.	S.106	Site Prep.	First Comp.	Total
Outline Application		4	3			7
Market Assessment						3
& Board Approval	6	4				10
Reserved Matters and/or Discharge of Pre-Commencement Conditions				3	6	9
Overall Time to 1st Completion						29*

Source: Lichfields

Notes: * rounded to 30 months for the purposes of calculating a delivery trajectory.

Table 8.5 No Planning Application - Lead-in Times (site up to 250 units)

Key Stages	Prep of App.	Consider App.	S.106	Site Prep.	First Comp.	Total
Application	6	4	3			13
Market Assessment						
& Board Approval						3
Reserved Matters and/or Discharge of Pre-Commencement Conditions	6	4				10
Site Commencement				3	6	9
Overall Time to 1st Completion						35*

Source: Lichfields

Notes: * rounded to 36 months for the purposes of calculating a delivery trajectory.

- 8.10 The lead-in times set out in these tables are likely to be an underestimate based on the recent report by Barratt Homes and Chamberlin Walker.⁷² The report notes that:

“New data for 2017 presented in this report, from Barbour ABI, indicates that ‘post-planning permission’ development timescales (C+D) have increased markedly: on sites of 20 homes or more it now takes at least 4.0 years on average from the grant of detailed planning permission to site completion, compared to the earlier LGA estimates of 1.7 to 3.2 years.”

In these circumstances the Council must set out clearly the lead-in times that are assumed and demonstrate that they are sound and robust. This is clearly not the case with the current evidence base.

Delivery Rates

- 8.11 Whilst housebuilders aim to deliver development on site as quickly as possible, in a similar fashion to the lead-in times outlined above, the annual delivery rate on sites will depend on a number of factors including overall site capacity. In our experience, sites with a capacity of less than 250 units are built out by one housebuilder using one outlet. As such, a reasonable average

⁷² The Role of Land Pipelines in the UK Housebuilding Process (September 2017) Barratt Homes & Chamberlin Walker

annual delivery rate in York is 40 dpa for sites with a capacity of less than 250 units. However, on sites of less than 100 units we have assumed a lower delivery rate of 25 dpa as these sites will generally be delivered by smaller housebuilders.

- 8.12 Generally, in York on sites with a capacity of between 250 units and 500 units there is often a second developer (or national housebuilders use a second outlet) delivering units simultaneously. As such, annual delivery rates increase but not exponentially to the number of housebuilders or delivery outlets. In our experience in the current market, sites with 2 outlets deliver approximately 65 dpa.
- 8.13 Finally, on large-scale sites with a capacity of more than 500 units, there are often up to three housebuilders or outlets operating simultaneously. As before, this does not increase delivery exponentially but it can be expected that three outlets operating simultaneously on a large scale would deliver approximately 90 dpa.

Table 8.6 Annual Delivery Rates

	0-100 units	100-250 units	250-500 units	500+ units
Annual Delivery	25 dpa	40 dpa	65 dpa	90 dpa

Source: Lichfields

- 8.14 Lichfields considers that it would be appropriate to apply the delivery rates identified above. The quantum of delivery of units on a site can be affected by a significant number of factors including local market conditions, general economic conditions, proximity to competing site, housing market area, type and quality of unit and the size of the development. There will be a number of sites in York that will experience higher annual delivery rather than the averages outlined above but there will also be a number of who deliver below the average also. It is therefore important not to adopt an average delivery rate which may only be achieved by a small minority of the strategic sites.

Density Assumptions

- 8.15 The 2017 SHLAA (page 20) sets out the density assumptions for each residential archetype.
- 8.16 It is considered that, the proposed densities are overly ambitious and will not be achieved on average on sites throughout York. For example, from our experience, it is not anticipated an average density of 50dph on sites of 1ha+ with a gross to net ratio of 95% can be achieved. Meeting open space requirements alone will preclude this ratio. There will be a very limited number of examples where this density has been achieved but a more appropriate and conservative figure should be pursued in the absence of firm details from a developer. The gross to net ratio at most should be 85%, although this can reduce to less than 60% for larger developments with significant infrastructure requirements.
- 8.17 Secondly, it is considered that a density of 40dph on suburban sites is highly aspirational and is unlikely to be achieved across a significant number of sites. This density is characterised by housing for the smaller households and thus not suitable for family accommodation. Our housebuilder clients and local intelligence has reaffirmed our concerns with the proposed average densities. Unless there is specific evidence to the contrary the default density on suburban sites should be 35 dph.
- 8.18 The Council has not provided sufficient information to back up their assumptions and we consider that these development densities should be revised downwards to ensure that the capacity of sites is not artificially inflated. Assumptions on development densities in the

absence of specific developer information should air on the side of caution and we consider that the details in the 2017 SHLAA are at variance with this principle.

Components of the Housing Supply

- 8.19 The components of the Council's supply are set out in the LPP. The LPP does not set out a delivery trajectory for each site and only sets out the expected delivery from each site over the plan period.
- 8.20 The information provided in the trajectory in the LPP is high level. It does not provide an annual housing delivery trajectory for each site over the plan period. The Council simply provides an assumed total completion figure for all sites each year without detailed reasoning on the methodology for deriving this figure.
- 8.21 As set out above, the Council includes several student sites in its future supply which is inappropriate as no robust evidence has been provided to demonstrate that there has been a reduction in the number of general market dwellings occupied by students as a direct result of the provision of purpose-built student accommodation. As a result, including student accommodation in the supply is flawed and risks severely distorting the figures.

Sites with Planning Permission

- 8.22 It is now a standard approach that sites with planning permission should be included in the supply (unless there is a good reason to exclude them) whereas sites without planning permission should be excluded (unless there is a good reason to include them). This interpretation is entirely logical as the absence of a planning permission is a clear impediment to development, which is contrary to the test that land should be available now.
- 8.23 The LPP [5.3] indicates that, as at 11th April 2017, there were extant planning permissions for 3,578 homes which will contribute towards meeting the overall housing requirement in the Plan. However, the Council has not identified these sites nor has it provided a delivery trajectory for each site to demonstrate how each of these sites contributes to delivery over the Plan period or to the 5-Year housing land supply. In the absence of this information it is not possible to ascertain whether these sites should be included in the supply. Lichfields therefore reserves the right to provide further comment on this matter as and when more detailed information is made available.

Allocations

- 8.24 Table 5.1 of the LPP identifies the housing and strategic sites which are proposed for allocation. It provides an estimated dwelling yield and estimated phasing for these sites (i.e. Short Term: Years 1-5, Medium Term: Years 1-10 etc.). For those sites where the phasing extends beyond years 1-5, the anticipated delivery of the sites in each 5 year phase is not confirmed.
- 8.25 The Council has not provided a detailed delivery trajectory for each of the Potential Strategic Housing Allocations and Potential General Housing Allocations. The Council has simply provided a figure for the total dwellings to be provided for the plan period without any justification or clarification on the assumptions used to derive the delivery figure. Lichfields therefore reserves the right to provide further comment on this matter as and when more detailed information is made available.
- 8.26 The estimated phasing in LPP Table 5.1 indicates that a number of large strategic sites are to commence delivery in Year 1. With regard to this matter, Lichfields would like to express a degree of caution in relation to resourcing issues at the Council. The Council are assuming that a significant number of large planning applications will be submitted and determined concurrently in a relatively short space of time. It is not clear if the Council has fully considered

the resourcing issues associated with dealing with all these application at the same time. In our experience, the Council's Department may not have sufficient capacity to deal with a number of major applications at the same time.

- 8.27 Based on the information provided, Lichfields also consider there are a number of sites where the delivery of development has been substantially overestimated by the Council, including the examples below.

Sites ST14 Land to West of Wigginton Road & ST15 Land to West of Elvington Lane

- 8.28 The estimated phasing in LPP Table 5.1 indicates that sites ST14 (Land to West of Wigginton Road) and ST15 (Land to West of Elvington Lane) will begin to deliver in Year 1 (2018/19). Lichfields consider this anticipated early delivery to be unrealistic for a number of reasons:
- 1 The sites are located within the Green Belt and no application is likely to be permitted until the Local Plan is adopted.
 - 2 A clear strategy is needed to deliver the sites during the plan period. Both are in multiple ownerships and the siting of each allocation without access to a public highway introduces an added level of complexity in negotiation and agreement between the parties involved.
 - 3 In view of their size and complexity much work will be needed to develop masterplans and establish viability of the developments to be progressed through the planning system.
 - 4 Detailed masterplans will be required to secure an appropriate form of development and ensure a phased delivery of the on-site services and facilities.
 - 5 Given the scale and location of the developments the schemes will need to be subject to full environmental assessment, especially to consider the likely impact on landscape, ecology and transportation and historic character of the City.
 - 6 The sites are isolated and there is no existing infrastructure capable of accommodating the proposed level of development. Both sites do not have frontage to a public highway with capacity that would allow even the smallest amount of development to commence. Their development will require major off-site highway improvements and new highway access roads and junctions. Other utilities will need to be procured and delivered in advance of any construction works on the site. This will inhibit the early delivery of the developments.
 - 7 The proposed sites are not obviously sustainable in that they are not easily accessible to existing social and community facilities or located close to existing public transport routes. Considerable effort will need to be made to ensure the allocations do not become satellite, dormitory communities wholly reliant on private transport for every journey away from the home.
- 8.29 The proposed delivery of units in Year 1 (2018/19) is ambitious and unrealistic given the extensive infrastructure requirements which will need to be put in place in advance of any development taking place. In addition, in view of the application of restrictive Green Belt policy it is inevitable that once the Local Plan is adopted the City of York Council will receive many planning applications for both large and smaller developments. Processing these applications will inevitably cause added delay, especially to the major, complex, housing allocations.
- 8.30 We consider that the identification of a portfolio of small site allocations (e.g. up to 250 dwellings) would assist in meeting any shortfall created by the delay in large sites delivering dwellings early in the plan period.

Windfalls

- 8.31 The Council claims that 169dpa will be delivered on windfall sites from Year 3 of the trajectory (2020/21) and provides justification for their windfall allowance in its Windfall Allowance Technical Paper (2017).

- 8.32 The Framework⁷³ sets out the local planning authorities may make allowance for windfall sites in the 5-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Furthermore, any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends.
- 8.33 Lichfields accept that windfalls should be included in the overall housing delivery trajectory but only consider that they are appropriate outwith the first 5-year period. The inclusion of a significant windfall figure in earlier years increases the likelihood of artificially inflating the housing delivery figures in year 3 and double counting sites with permission. It does not account for any potential delays to the build out sites with extant consent. As such, the windfall allowance should be amended to only make an allowance from Year 5 (2022/23) onwards.
- 8.34 The Council consider that an annual windfall of 169dpa is appropriate to take account of potential delivery on sites of <0.2ha and completions on change of use and conversion sites.
- 8.35 However, the figure of 169 dwellings has only been achieved four times over the past 10 years and only twice since the base date of the new plan period (2012). This is during a period when the application of a very tight inner Green Belt boundary has precluded urban edge development at a time of ever increasing housing demand. In such circumstances it would have been an ideal period for windfall development to increase; but it did not. There is therefore no justification for such a high allowance.
- 8.36 In relation to the delivery on sites of <0.2ha, Lichfields consider that the proposed windfall allowance is too high because tightly defined settlement boundaries in York and surrounding settlements means there is a finite supply of sites which can come forward. This supply has been curtailed by the change in definition of previously developed land (June 2010) to remove garden sites. In addition, the Council started to request small sites to make contributions towards affordable housing provision and required rural sites with a capacity of more than 15 units to provide on-site affordable housing. This has made the provision of units on small sites less attractive to the market. Since the policy change and the introduction of affordable housing contributions the quantum of completions on windfall sites in York has plummeted. As a consequence, the future supply from this source should only consider the average completion rate since 2009/10 of 33dpa.
- 8.37 In relation to the delivery from conversions, the average completion figure in the past three years is largely dependent on recent changes to permitted development rights. As a consequence, it is considered that after an initial surge the conversion rate will revert back to the long term average. It is likely that the optimum conversion sites will be completed in the short term and the less sustainable and attractive office developments in York will not be converted. As such the average conversion rate from 2007/08 to 2013/14 of 64dpa should be used.
- 8.38 Based on the above assessment it is considered that the proposed windfall allowance should be reduced from 169dpa to 100dpa (rounded up from 97) which represents a far more realistic windfall allowance over the plan period. The incorporation of this figure would ensure that the Council's trajectory is not artificially inflated, can be realistically achieved and would only be incorporated into the delivery trajectory at Year 5 (2022/23) to ensure no double counting.
- 8.39 It is considered that the Council's information does not adequately justify a windfall allowance of 169dpa and does not provide sufficient certainty that this figure will be achieved over the plan period. We reserve the right to revise our position on windfalls if the Council prepares and releases further justification.

⁷³ The Framework, §48

Conclusion

- 8.40 Lichfields has undertaken an analysis of the Council's evidence base documents and consider that the evidence provided by the Council is not sufficient to demonstrate that the dwelling requirement over the plan period and a 5-Year supply will be achieved. It is also considered that some of the proposed delivery rates on sites are unfounded and unrealistic.

9.0 **Balance of the Requirement and Supply**

Introduction

9.1 The Council has not produced a trajectory or a detailed assessment of the 5-year supply position, as required by the Framework. In these circumstances, it can only be assumed that the Council considers that it can demonstrate an adequate housing supply in the initial 5-year period and over the plan period. However, no evidence has been produced to demonstrate this position.

9.2 As a consequence, this section sets out an assessment of the housing supply against the three OAHNs for York (set out in Section 4).

5-Year Supply

Adequacy of Supply

9.3 The five year supply has been assessed against the Council's LPP housing target of 867 dpa; the SHMA Update's OAHN of 953 dpa; and Lichfields OAHN (1,150 dpa). The requirement is then compared to the Council's supply figures. The assessments in both cases make provision for the backlog and 20% buffer for persistent under delivery as calculated in Section 7. The calculation of Lichfields' position excludes any windfall allowance for the reasons we have set out in this Technical Report. As the Council has not provided adequate evidence to show how committed, allocated sites, student housing etc. factor into the housing supply, it has not been possible to fully assess the supply position and make further amendments. However, on the basis of our comments above, it is likely that this would reduce the housing supply considerably. Table 9.1 sets out the relative positions.

Table 9.1 5-Year Housing Land Supply Position using the Council's and Lichfields' OAHNs

Housing Requirement (2017-2022)		York Assumed Position		SHMA OAHN		Lichfields' Position	
Local Plan OAHN (dpa)			867		953		1,150
5 Year Requirement	2017-2022		4,335		4,765		5,750
Backlog	2012-2017	903		1,333		2,498	
Framework Buffer	20%	1,048		1,220		1,650	
Sub Total		1,951	1,951	2,553	2,553	4,148	4,148
5-year Requirement	2017-2022		6,286		7,318		9,898
Annual 5-year requirement			1,257		1,464		1,980
Housing Supply (2017-2022)							
Projected Housing Completions including Windfall Allowance from Year 3 (windfall allowance excluded from Lichfields' Position)			5,902		5,902		5,769
Total Supply	2017-22		5,902		5,902		5,769
Difference (Undersupply expressed as a minus)			-384		-1,416		-4,129
5-Year Supply Expressed as Years of Residual Annual Requirement			4.70		4.03		2.91

Source: Lichfields Analysis

- 9.4 The table demonstrates that even when comparing the likely delivery within the 5-year period to the Council's OAHN, there is not an adequate supply of housing land. Based on the Council's approach, there is only a supply of 4.70 years (with an undersupply of 384 dwellings), falling to 4.03 years if the higher SHMA OAHN is applied. If the Lichfields OAHN is used there is a supply of 2.91 years and a shortfall of 4,129 dwellings.
- 9.5 In addition, for the reasons we have raised in the previous section, the Council's 5-year supply figure of 5,902 dwellings is considered to be optimistic and all of this supply is unlikely to come forward over the 5-year period, which would further exacerbate the supply shortfall. Furthermore, including student accommodation in the supply without clearly evidencing how this would release housing onto the market elsewhere is not in accordance with the Practice Guidance or recent High Court judgements, and risks severely distorting the Council's land supply figures as a consequence.

Implications of the 5-Year Supply Position

- 9.6 The Council has a significant shortage of housing land in the first 5-years. This is a significant issue for the Council which means the plan is not 'sound' in its current form. It is therefore imperative that additional sites are allocated for housing to tackle this issue. These should be sites without any immediate constraints that can be delivered quickly once the plan is adopted.

The Plan Period Supply

- 9.7 There is also a significant shortfall of housing over the Plan period, when assessed against the Lichfields OAHN of 1,150 dpa and the 2,498 dwelling shortfall in delivery for the period 2012 to 2017 identified in Table 7.2 (a total figure of 20,898 dwellings over the Plan period 2012 to 2033). LPP Table 5.2 indicates a supply of 18,839 dwellings which is equivalent to a shortfall of 2,059 dwellings over this period.

Conclusion

- 9.8 The Council has not produced a trajectory or a detailed assessment of the 5-year supply position as required by the Framework. No evidence has therefore been produced to demonstrate the Council's housing supply position.
- 9.9 The assessment of the balance between the housing requirement and supply demonstrates that there is a significant shortfall for 5-year period. For the plan period, there is also a significant shortfall when assessed against the Lichfields assessment of the OAHN.
- 9.10 In these circumstances, the emerging plan is not 'sound' as required by the Framework, as the Council has not demonstrated an adequate short and longer-term supply as required by national guidance.
- 9.11 The Council should allocate additional land to meet the housing needs of the community and these sites should be able to deliver early in the plan period. This is the only approach that will deliver a 'sound' plan and enable the much needed investment in new housing to meet the community's needs.
- 9.12 It should be noted that the above assessment is reliant upon the information provided in the LPP and associated evidence base documents. Lichfields therefore reserves the right to update the above evidence as and when further information becomes available, particularly regarding student housing needs.

10.0 Summary

Context

- 10.1 The Framework sets out that LPAs should use their evidence base to ensure they meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework.
- 10.2 The SHMA Assessment Update makes a number of assumptions and judgements which Lichfields considers to be flawed, or which do not properly respond to the requirements of policy and guidance. As a result, the concluded OAHN is not robust and is inadequate to meet need and demand within the HMA.

Conclusions on the City of York's Housing Need

- 10.3 The Council's approach to identifying an assessed need of 867 dpa in the introductory section of the SHMA Assessment Update is considered to be fundamentally flawed. This is effectively a 'policy-on' intervention by the Council which should not be applied to the OAHN. It has been confirmed in the Courts that FOAN is 'policy off' and does not take into account supply pressures. The Council's approach to identifying the OAHN, as set out in the SHMA Assessment Update, would therefore be susceptible to legal challenge. The calculation of OAHN should therefore be based on the normal 'policy-off' methodology.
- 10.4 There are a number of significant deficiencies in the SHMA Assessment Update which means that the 953 dpa OAHN figure identified in the Assessment Update is not soundly based. In particular:
- 1 GL Hearn clearly accepts that an increase in household formation rates is necessary to respond to continued suppression of household formation rates within younger age groups within the official projections. However this demographic-led figure of 871 dpa does not appear to have been carried forward by GL Hearn in calculating the resultant housing need, as noted below. Lichfields agree with making an adjustment for demographic and household formation rates. However, it would be illogical to revert back to unadjusted projections of 867 dpa and then take this to apply the adjustment for market signals and affordable housing, when a demographic need of 871 dpa has been identified.
 - 2 Overall, the Assessment Update fails to distinguish between the affordable housing needs of the City of York and the supply increase needed to address market signals to help address demand. Instead the SHMA blends the two elements within the same figure resulting in a conflated figure which is lower than the level of uplift deemed reasonable by the Eastleigh and Canterbury Inspectors, despite the fact that market signals pressures in York indicate signs of considerable stress and unaffordability. The Practice Guidance is clear that the worse affordability issues, the larger the additional supply response should be to help address these.
 - 3 Given the significantly worsening market signals identified in City of York, Lichfields consider that a 20% uplift would be appropriate in this instance and should be applied to the OAHN, plus a further 10% uplift to help address affordable housing needs.
- 10.5 The scale of objectively assessed need is a judgement and the different scenarios and outcomes set out within this report provide alternative levels of housing growth for the City of York. Lichfields considers these to be as follows:
- 1 **Demographic Baseline:** The 2014-based household projections indicate a net household growth of 867dpa between 2014 and 2024 (including a suitable allowance for vacant/second homes. Once a suitable adjustment has been made to rebase the projections to the (slightly lower) 2015 MYE, and through the application of accelerated headship rates

amongst younger age cohorts takes the demographic starting point to 871dpa.

- 2 **Market Signals Adjustment:** GL Hearn's uplift is 10%. However, for the reasons set out above, Lichfields considers that a greater uplift of 20% would be more appropriate in this instance. When applied to the 871dpa re-based demographic starting point, this would indicate a need for 1,045dpa.

The demographic-based projections would support a reasonable level of employment growth at levels above that forecast by Experian, past trends or the Blended job growth approach. As such, no upward adjustment is required to the demographic-based housing need figures to ensure that the needs of the local economy can be met;

- 3 The scale of **affordable housing needs**, when considered as a proportion of market housing delivery, implies higher levels of need over and above the 1,045dpa set out above. It is considered that to meet affordable housing needs in full (573dpa), the OAHN range should be adjusted to 1,910dpa @30% of overall delivery. It is, however, recognised that this level of delivery is likely to be unachievable for York. Given the significant affordable housing need identified in City of York Lichfields consider that a further 10% uplift would be appropriate in this instance and should be applied to the OAHN, resulting in a final figure of **1,150 dpa**.

This is 7.5% higher than the MHCLG proposed standardised methodology figure of 1,070 dpa.

- 10.6 This allows for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth. Using this range would ensure compliance with the Framework [§47] by significantly boosting the supply of housing. It would also reflect the Framework [§19], which seeks to ensure the planning system does everything it can to support sustainable development. We would note that these figures do not include the need for specialised student accommodation, which would be additional.

Conclusions on Housing Land Supply

- 10.7 The Council has not produced a trajectory or a detailed assessment of the 5-year supply position as required by the Framework. No evidence has therefore been produced to demonstrate the Council's housing supply position.
- 10.8 Furthermore, including student accommodation in the supply without clearly evidencing how this would release housing onto the market elsewhere does not accord with the Practice Guidance or recent High Court judgements, and risks severely distorting the Council's land supply figures as a consequence
- 10.9 The assessment of the balance between the housing requirement and supply demonstrates that there is a significant shortfall for the 5-year period. For the plan period, there is also a significant shortfall when assessed against the Lichfields assessment of the OAHN. Based on the Council's approach, there is only a supply of 4.70 years (with an undersupply of 384 dwellings), falling to 4.03 years if the higher SHMA OAHN is applied. If the Lichfields OAHN is used there is a supply of 2.91 years and a shortfall of 4,129 dwellings.
- 10.10 In these circumstances, the emerging plan is not 'sound' as required by the Framework, as the Council has not demonstrated an adequate short and longer-term supply as required by national guidance.
- 10.11 The Council should allocate additional land to meet the housing needs of the community and these sites should be able to deliver early in the plan period. This is the only approach that will deliver a 'sound' plan and enable the much needed investment in new housing to meet the community's needs.

- 10.12 **It should be noted that the above assessment is reliant upon the information provided in the LPP and associated evidence base documents. Lichfields therefore reserves that right to update the above evidence as and when further information becomes available.**

Appendix 1: Lichfields Market Signals Assessment

Appendix 1

Our ref 50642/03/MW/CR

Date 19th March 2018

Subject Lichfields Market Signals Assessment

1.0 Market Signals

Introduction

- 1.1 The Framework sets out the central land-use planning principles that should underpin both plan-making and decision-taking. It outlines twelve core principles of planning that should be taken account of, including the role of market signals in effectively informing planning decisions:

“Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.” [§17]

- 1.2 The Practice Guidance requires market signals to be assessed against comparator locations . The analysis in the following sections focuses on comparing the City of York and other Local Authorities and England to benchmark their performance against trends both across the wider region and nationally.

- 1.3 The Guidance sets out six key market signals¹:

- 1 land prices;
- 2 house prices;
- 3 rents;
- 4 affordability;
- 5 rate of development; and,
- 6 overcrowding.

- 1.4 It goes on to indicate that appropriate comparison of these should be made with upward adjustment made where such market signals indicate an imbalance in supply and demand, and the need to increase housing supply to meet demand and tackle affordability issues:

“This includes comparison with longer term trends (both in absolute levels and rates of change) in the housing market area; similar demographic and economic areas; and nationally. Divergence under any of these circumstances will require upwards adjustment to planned housing numbers compared to ones based solely on household projections”.

“In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable. The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in

¹ 2a-019-20140306

affordability needed and, therefore, the larger the additional supply response should be.”²

- 1.5 The Practice Guidance sets out a clear and logical ‘test’ for the circumstances in which objectively assessed needs (including meeting housing demand) will be in excess of demographic-led projections. In the context of the Framework and the Practice Guidance, the housing market signals have been reviewed to assess the extent to which they indicate a supply and demand imbalance in the City of York and other comparable local authorities and therefore indicate that an upwards adjustment should be made over the demographic-led baseline already identified.

Housing Market Indicators

- 1.6 In the context of The Framework and the Practice Guidance, each of the housing market signals have been reviewed to assess the extent to which they indicate an imbalance between supply and demand in the City of York.

Land Prices

- 1.7 CLG has published a document entitled ‘*Land value estimates for policy appraisal*’ (February 2015) which contains post permission residential land value estimates, per hectare for each Local Authority. For York this figure is £2,469,000 per hectare, well above the equivalent figure for England (excluding London) of £1,958,000.

House Prices

- 1.8 The Practice Guidance³ identifies that longer term changes in house prices may indicate an imbalance between the demand for and supply of housing. Although it suggests using mix-adjusted prices and/or House Price Indices, these are not available at local authority level on a consistent basis, and therefore for considering market signals in York, price paid data is the most reasonable indicator.
- 1.9 Land Registry price paid data displays the median prices in York, alongside North Yorkshire and England as of 2016 (Table 1.1). These median prices illustrate lower prices in York compared to national rates, but higher prices than in the surrounding sub-region.

Table 1.1 Median Dwelling price, York (2016)

	Median Dwelling Price 2016
York	£220,000
North Yorkshire	£199,995
England	£224,995

Source: ONS Price Paid Data

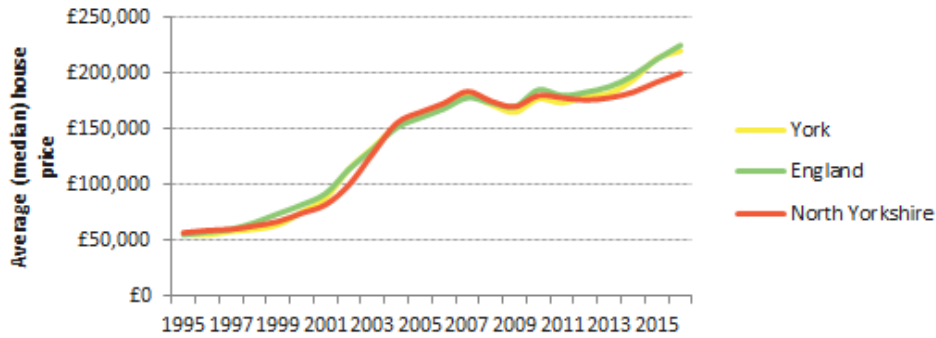
- 1.10 CLG publishes series data on median house prices based on the same Land Registry price paid data series. This currently runs from 1996 to 2016. This longitudinal analysis is illustrated in Figure 1.1, which indicates that the City of York has seen virtually identical levels of house price growth to the national average since 1999. The figure remains slightly below the England

² 2a-020-20140306

³ 2a-019-20140306

average at present, but is above the North Yorkshire median.

Figure 1.1 Median House Prices



Source: ONS Price Paid Data

- 1.11 In 2016 median house prices in York were just 2% lower than the national average, whilst the City ranked as being the 166th most expensive place to live in England (out of 326 districts).
- 1.12 It is particularly important to note that over the previous 17 years (1999-2016), median house prices have increased by 244% (or £156,000) in York, compared to 204% nationally and 199% across North Yorkshire as a whole.
- 1.13 As set out in the Practice Guidance, higher house prices and long term, sustained increases can indicate an imbalance between the demand for housing and its supply. The fact that York's median house prices have effectively tripled in 17 years, from £64,000 in 1999 to £220,000 in 2016, and have risen at a much faster rate than comparable national and sub-regional figures, suggests that the local market is experiencing considerable levels of stress.

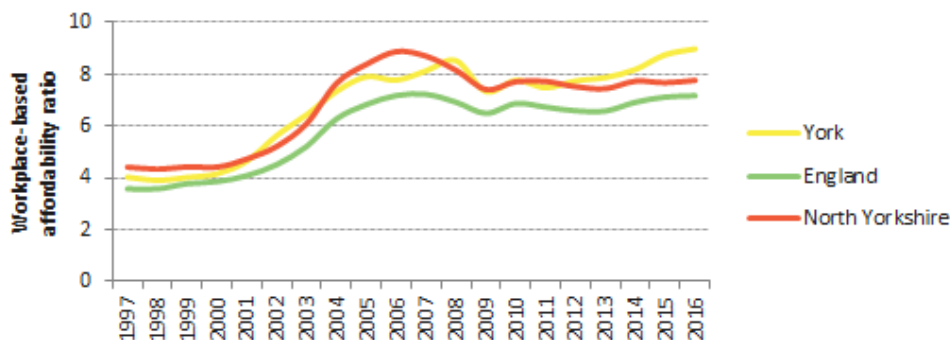
Affordability

- 1.14 The CLG's former SHMA Practice Guidance defines affordability as a '*measure of whether housing may be afforded by certain groups of households*'⁴. A household can be considered able to afford to buy a home if it costs 3.5 times the gross household income for a single earner household or 2.9 times the gross household income for dual-income households. Where possible, allowance should be made for access to capital that could be used towards the cost of home ownership [page 42].
- 1.15 The Practice Guidance concludes that assessing affordability involves comparing costs against a household's ability to pay, with the relevant indicator being the ratio between lower quartile house prices and lower quartile [LQ] earnings.
- 1.16 Using CLG affordability ratios, Figure 1.2 illustrates that although the ratio fell substantially from a peak of 8.14 in 2008 following the financial crash and subsequent economic downturn, it has steadily increased since 2009 at a much faster rate than North Yorkshire as a whole. This suggests that levels of affordability are declining in York at a pace which is not the case for the rest of the sub-region (and indeed, for the country as a whole). In 2016, the median house price

⁴ Annex G

in York City was approximately 9.0-times the LQ (workplace-based) income, compared to 7.8 for North Yorkshire and 7.2 nationally.

Figure 1.2 Ratio of house price to lower quartile earnings



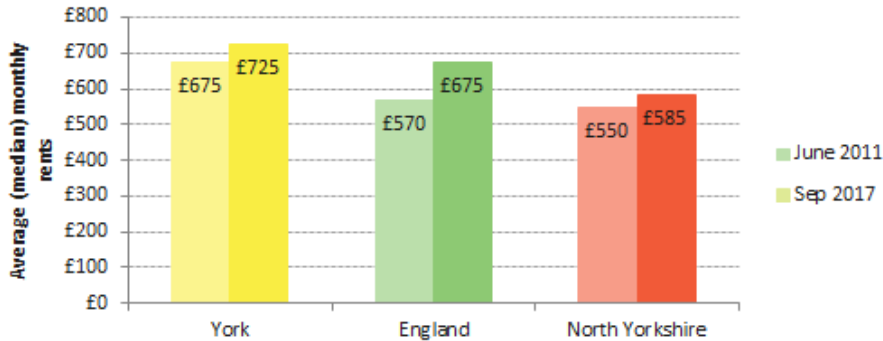
Source: ONS Affordability Data

- 1.17 It can be seen in Figure 1.2 that over the past 19 years, the ratio of lower quartile house prices to lower quartile earnings in York has been consistently above the national average, with the gap widening over time. Indeed, the rate of increase is worrying – between 2002 and 2016, the affordability ratio increased by 39%, significantly above the comparable growth rate for North Yorkshire (+27%) and England (+37%). Indeed, across the whole of northern England, only Manchester City has experienced a higher rate of increase in its affordability ratio than York.
- 1.18 The affordability ratio highlights a constraint on people being able to access housing in York, with house price increases and rental costs outstripping increases in earnings at a rate well above the national level.

Rents

- 1.19 On a similar basis, high and increasing private sector rents in an area can be a further signal of stress in the housing market. Median rents in York are £725 per month, with median rents ranging from £595 per month for a 1 bed flat, to £1,500 per month for a 4+ bed house. All of these figures are significantly higher than the national average, with overall average rents comprising £675 across England, and £585 for North Yorkshire. Rental levels are therefore 7.4% higher than comparable national figures (Figure 1.3).

Figure 1.3 Median Monthly Rents



Source: VOA Private Rental Market Statistics

Rate of Development / Under delivery

1.20 The rate of development is intended to be a supply-side indicator of previous delivery. The Practice Guidance states that:

“...if the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan”⁵

1.21 York has never had an adopted Local Plan, hence the only relevant previous ‘planned supply’ figure is the target within the former Yorkshire and the Humber RS up to 2012. Thereafter, we have compared delivery against the household projections and its preferred OAHN range, as set out in Table 1.2.

Table 1.2 Rate of net housing delivery in York against possible policy benchmarks, 2004/05-2015/16

Year	Net Housing Completions	Council's OAHN (867 dpa)	
		'Need'*	+/-
2004/05	1,160	640	+520
2005/06	906	640	+266
2006/07	798	640	+158
2007/08	523	640	-117
2008/09	451	850	-399
2009/10	507	850	-343
2010/11	514	850	-336
2011/12	321	850	-529
2012/13	482	867	-385
2013/14	345	867	-522
2014/15	507	867	-360
2015/16	1,121	867	+254
2016/17	977	867	110
Total	8,612	10,295	-1,683

Source: ARUP (August 2015): Evidence on housing Requirements in York: 2015 Update, Table 4 and City of York Half Year Housing Monitoring Update for Monitoring Year 2017/181

*RSS assumed average 640 dpa 2005/05-2007/08; 850 dpa 2008/09 -2011/12

⁵Section 2a-019-20140306

- 1.22 It is clear from the Council's own evidence that the City has consistently under-delivered housing, with a failure to deliver anything more than 525 dwellings in any single year between 2007 and 2015. The policy benchmarks suggest that the level of past under-delivery is 1,683 dwellings over the past 13 years.
- 1.23 Furthermore, the Council's already low housing delivery figures have been artificially boosted by the inclusion of student accommodation in the completions figures. For example, CYC's 2012/13 Annual Monitoring Report states that 482 (net) dwellings were completed in 2012/13, but this figure includes 124 student cluster flats. The 6 months completions data set out in CYC's Housing Monitoring Update (Table 3, October 2017) suggested that the Council was continuing to rely on student housing completions to boost its housing numbers, with 637 of the total 1,036 net completions during the first half of the 2017/18 monitoring year comprising privately managed off-campus student accommodation.

Overcrowding and Homelessness

- 1.24 Indicators on overcrowding, sharing households and homelessness demonstrate un-met need for housing within an area. The Practice Guidance suggests that long-term increases in the number of such households may be a signal that planned housing requirements need to be increased.
- 1.25 The Guidance states that indicators on:
- "...overcrowding, concealed and sharing households, homelessness and the number in temporary accommodation demonstrate unmet need for housing. Longer term increases in the number of such households may be a signal to consider increasing planned housing numbers..."*⁶
- 1.26 The Census measures overcrowding based on a standard formula, which measures the relationships between members of a households (as well as the number of people in that household) to determine the number of rooms they require. A rating of -1 or less indicates a household has one fewer room than required, +1 or more indicates a household has one or more rooms than needed. At the national level, affordability issues in recent years, as well as a shortfall in housing supply, have meant that people are either willing to accept sub-optimal living conditions (e.g. living in a smaller home to manage costs) or are forced into accepting such housing outcomes (e.g. are priced out of the market and have to share with friends/family).
- 1.27 Table 1.3 illustrates that overcrowding against the occupancy rating in York is not severe, with 7.10% of households living in a dwelling that is too small for their household size and composition. This compares to 8.7% nationally. However, it represents a significant increase of 2 percentage points on the 5.1% recorded in York in 2001, which is above the national trend (which had increased by 1.6 percentage points from 7.1% in 2011).

⁶ Section 2a-019-20140306

Table 1.3 Overcrowding: Household Room Occupancy Rating

	2001			2011		
	Total Households	-1 room occupancy or less	-1 room occupancy or less (%)	Total Households	-1 room occupancy or less	-1 room occupancy or less (%)
York	76,926	3,887	5.1%	83,552	5,930	7.1%
England	20,451,427	1,457,512	7.1%	22,063,368	1,928,596	8.7%

Source: Census 2001 / Census 2011

Note: The definition of the Census 'bedroom standard' is slightly different from the 'occupancy rating' that informs the Government's Under-Occupancy Charges, i.e. the Census states that 'two persons of the same sex aged between 10 and 20' can occupy one bedroom, whilst the Under Occupancy Charge changes this to 'any two children of the same sex aged under 16'. It is possible that if the Government's policy continues into the long term, then changes will be made to the categorisation of the Census's Occupancy Rating to bring the two datasets into line.

1.28 The Census also recorded the number of concealed families (i.e. where there is more than one family present in a household). Nationally, this rose significantly between 2001 and 2011, at least in part due to the impact of the recession on younger households' ability to afford their own home. This meant that many younger people, including families, remained in the family home for longer than might have been expected in the past, either through choice (to save money) or through necessity.

1.29 At the time of the 2011 Census, 1.9% of all families in England were concealed; this represented 275,954 families. This is a rise compared to 2001 when 1.2% of families were concealed. In York, a lower percentage of families were concealed (1.1%) than nationally (1.9%). However, this represents a higher proportional rise, of almost two thirds, from the 2001 figure. This is presented in Table 1.4.

Table 1.4 Concealed Families in York, Yorkshire and Humber and England 2001-2011

	Concealed Families		Change (percentage points)	Change in %
	2001	2011		
York	330 (0.7%)	586 (1.1%)	+0.43	+65.7%
Yorkshire and the Humber	15,890 (1.1%)	25,410 (1.7%)	+0.57	+51.1%
England	161,254 (1.2%)	275,954 (1.9%)	+0.69	+59.2%

Source: Census 2011/2011

1.30 The levels of overcrowding and concealed households in York are moderate when compared with the national and regional averages but have increased at a higher rate (albeit from a lower base). While the level of overcrowding and number of concealed households is not so significant as to conclude that there is severe market pressure, it nevertheless highlights inadequacy reducing flexibility in the housing market.

1.31 The levels of overcrowding are likely to be a symptom associated with restricted incomes in York, with people either willing to accept sub-optimal living conditions (e.g. living in smaller houses to manage costs) or forced into accepting such housing outcomes (e.g. are priced out and have to share with friends/family). In such circumstances, overcrowding and concealed households may be indicative of insufficient supply to meet demand.

- 1.32 Table 1.5 indicates that York has a comparatively low number of homeless people in priority need, of just 97 (or 1.1 per 1,000 households), which is less than half the national rate. The fall in homelessness levels in the City has also been much more pronounced than elsewhere in England over the past ten years, although broadly comparable to Yorkshire and the Humber as a whole.

Table 1.5 Number accepted as being homeless and in priority need 2006/07-2016/17

	Homeless and in Priority Need		% Change	Absolute Change
	2006/07	2016/17		
York	213 (2.70 / 1,000 H'holds)	97 (1.1 / 1,000 H'holds)	-54%	-1.60 / 1,000 H'holds
Yorkshire and the Humber	8,220 (3.87 / 1,000 H'holds)	3,670 (1.60 / 1,000 H'holds)	-55%	-2.27 / 1,000 H'holds
England	73,360 (3.48 / 1,000 H'holds)	59,110 (2.54 / 1,000 H'holds)	-19%	-0.94 / 1,000 H'holds

Source: CLG Live Table 784: Local authorities' action under the homelessness provisions of the Housing Acts (P1e returns)

Synthesis of Market Signals

- 1.33 Drawing together the individual market signals above begins to build a picture of the current housing market in and around York; the extent to which demand for housing is not being met; and the adverse outcomes that are occurring because of this.
- 1.34 The performance of York against County and national comparators for each market signal is summarised in Table 1.6. When quantified, York has performed worse in market signals relating to both absolute levels and rates of change against North Yorkshire and England in 13 out of 28 measures.
- 1.35 It is clear that the City is currently facing very significant challenges in terms of house prices and private rental values causing affordability difficulties.

Table 1.6 Summary of York Market Signals against North Yorkshire and England

Market Signal	North Yorkshire		England	
	Absolute Figure	Rate of Change	Absolute Figure	Rate of Change
House Prices	Worse	Worse	Better	Worse
Affordability Ratios	Worse	Worse	Worse	Worse
Private Rents	Worse	Worse	Worse	Better
Past Development	~	~	~	~
Homelessness (Households in Temporary Accommodation)	Better	Better	Better	Better
Homelessness (Households in Priority Need)	Better	Better	Better	Better
Overcrowding (Overcrowded Households)	Worse	Worse	Better	Worse
Overcrowding (Concealed Families)	Same	Same	Better	Better

Source: Lichfields Analysis

Footnote:

Worse = performing worse against the average

Better = performing the same or better against the average

~ = data not available

- 1.36 To draw meaningful conclusions on the extent to which these market indicators show housing market stress within the City of York and a level of supply that is not meeting demand, the Practice Guidance suggests that comparisons of absolute levels and rates of change in such indicators should be made with comparator areas and nationally. For this reason, York has been compared and ranked against other local authority areas, and England as a whole.
- 1.37 These comparator areas have been chosen on the following basis:
- 1 Other nearby areas within the wider Yorkshire and the Humber Region:
 - a East Riding
 - b Hambleton
 - c Harrogate
 - d Hull
 - e Leeds
 - f Ryedale
 - g Selby
 - h Wakefield
 - 2 The Practice Guidance also states that market signals must be compared with authorities which are not necessarily close geographically, but which share characteristics in terms of economic and demographic factors. These authorities have been chosen by examining the ‘OAC Supergroup Area Classification Map’, produced by the ONS in 2015, which groups each local authority into various socio-economic classifications. York, as a ‘Coast and Heritage’ authority, has been compared with other communities similarly classified within this ranking and which share similar socio-economic characteristics:
 - a Bath and North East Somerset
 - b Canterbury
 - c Cheltenham
 - d Colchester
 - e Lancaster
 - f Scarborough
 - g Taunton Deane
 - h Worcester
- 1.38 England has been used as the final comparator for both sets of tables. A comparison across the range of housing market signals within the authorities identified above is presented in Table 1.7 and Table 1.8. A higher ranking in these tables suggests a worse, or comparatively poorer-performing, housing market for that indicator.

Table 1.7 York Market Signals Comparator Table [Neighbouring Authorities]

Rank	House Prices (to year ending December)			Resident-based Affordability			Workplace-based Affordability			Rents		
	2016	Change (£) 1999-2016	Change (%) 1999-2016	2016	Change (absolute) 2002-2016	Change (%) 2002-2016	2016	Change (absolute) 2002-2016	Change (%)	Sep 2017	Change (absolute) June 2011-Sep 2017	Change (%) June 2011-Sep 2017
1	Harrogate	Harrogate	York	Ryedale	Ryedale	gston upon Hull, Cit	Ryedale	Ryedale	gston upon Hull, Cit	York	England	England
2	England	York	Harrogate	Harrogate	Harrogate	ast Riding of Yorkshi	Harrogate	York	Ryedale	Harrogate	Leeds	Leeds
3	Hambleton	England	Ryedale	York	York	Wakefield	York	gston upon Hull, Cit	York	England	Harrogate	gston upon Hull, City of
4	York	Hambleton	Selby	Hambleton	ast Riding of Yorkshi	England	Hambleton	England	ast Riding of Yorkshi	Leeds	gston upon Hull, Cit	Harrogate
5	Ryedale	Ryedale	England	England	England	Ryedale	Selby	ast Riding of Yorkshi	England	Hambleton	York	Ryedale
6	Selby	Selby	Hambleton	Selby	gston upon Hull, Cit	York	England	Harrogate	Wakefield	Ryedale	Ryedale	Selby
7	Leeds	ast Riding of Yorkshi	gston upon Hull, Cit	ast Riding of Yorkshi	Selby	Harrogate	Selby	ast Riding of Yorkshi	Selby	Selby	Selby	York
8	ast Riding of Yorkshi	Leeds	ast Riding of Yorkshi	Leeds	Wakefield	Leeds	Leeds	Hambleton	Leeds	Wakefield	ast Riding of Yorkshi	ast Riding of Yorkshire
9	Wakefield	Wakefield	Leeds	Wakefield	Leeds	Selby	Wakefield	Wakefield	Harrogate	ast Riding of Yorkshi	Hambleton	Hambleton
10	gston upon Hull, Cit	gston upon Hull, Cit	Wakefield	gston upon Hull, Cit	Hambleton	Hambleton	gston upon Hull, Cit	Leeds	Hambleton	gston upon Hull, Cit	Wakefield	Wakefield
11												
12												
13												
14												
	ONS Price Paid Data			ONS Affordability Data			ONS Affordability Data			VOA Private Rental Market Statistics		

Rank	Overcrowded households			Concealed families			~			~		
	2011	Change (% points)	Change (number)	2011	Change (% points)	Change (number)						
1	Leeds	York	England	England	gston upon Hull, Cit	England						
2	England	England	Leeds	Leeds	England	Leeds						
3	gston upon Hull, Cit	gston upon Hull, Cit	gston upon Hull, Cit	gston upon Hull, Cit	Selby	gston upon Hull, City of						
4	York	Leeds	York	Wakefield	Leeds	Wakefield						
5	Wakefield	Harrogate	ast Riding of Yorkshi	Selby	Wakefield	ast Riding of Yorkshire						
6	Harrogate	Selby	Wakefield	York	York	York						
7	Selby	ast Riding of Yorkshi	Harrogate	Hambleton	Hambleton	Selby						
8	ast Riding of Yorkshi	Wakefield	Selby	ast Riding of Yorkshi	ast Riding of Yorkshi	Harrogate						
9	Ryedale	Hambleton	Hambleton	Harrogate	Harrogate	Hambleton						
10	Hambleton	Ryedale	Ryedale	Ryedale	Ryedale	Ryedale						
11												
12												
13												
14												
	Census			Census								

Table 1.8 York Market Signals Comparator Table ['Coast and Heritage' Authority Comparisons]

Rank	House Prices (to year ending December)			Resident-based Affordability			Workplace-based Affordability			Rents		
	2016	Change (£) 1999-2016	Change (%) 1999-2016	2016	Change (absolute) 2002-2016	Change (%) 2002-2016	2016	Change (absolute) 2002-2016	Change (%)	Sep 2017	Change (absolute) June 2011-Sep 2017	Change (%) June 2011-Sep 2017
1	and North East Som	and North East Som	Canterbury	and North East Som	and North East Som	Lancaster	Canterbury	Canterbury	York	and North East Som	Lancaster	Lancaster
2	Canterbury	Canterbury	York	Canterbury	Canterbury	and North East Som	and North East Som	York	England	Canterbury	and North East Som	and North East Somerset
3	Cheltenham	Colchester	Colchester	York	York	England	York	and North East Som	Lancaster	York	England	England
4	Colchester	Cheltenham	and North East Som	Colchester	Colchester	Canterbury	Cheltenham	England	Canterbury	Colchester	Colchester	Colchester
5	England	York	England	Taunton Deane	England	York	Cheltenham	Cheltenham	Cheltenham	Cheltenham	Worcester	Worcester
6	York	England	Lancaster	Worcester	Lancaster	Colchester	Taunton Deane	Lancaster	and North East Som	England	Cheltenham	Scarborough
7	Taunton Deane	Taunton Deane	Cheltenham	Cheltenham	Scarborough	Scarborough	Worcester	Worcester	Worcester	Taunton Deane	Scarborough	Cheltenham
8	Worcester	Worcester	Taunton Deane	England	Worcester	Worcester	England	Colchester	Scarborough	Worcester	Canterbury	Taunton Deane
9	Lancaster	Lancaster	Scarborough	Scarborough	Taunton Deane	Taunton Deane	Scarborough	Scarborough	Scarborough	Lancaster	York	Canterbury
10	Scarborough	Scarborough	Worcester	Lancaster	Cheltenham	Cheltenham	Lancaster	Taunton Deane	Taunton Deane	Scarborough	Taunton Deane	York
11												
12												
13												
14												
	ONS Price Paid Data			ONS Affordability Data			ONS Affordability Data			VOA Private Rental Market Statistics		

Rank	Overcrowded households			Concealed families			~			~		
	2011	Change (% points)	Change (number)	2011	Change (% points)	Change (number)						
1	England	York	England	England	England	England						
2	Cheltenham	Colchester	York	Worcester	Canterbury	York						
3	Canterbury	Cheltenham	Colchester	Canterbury	York	Canterbury						
4	Colchester	England	and North East Som	Scarborough	Taunton Deane	Colchester						
5	York	Worcester	Canterbury	Lancaster	Scarborough	and North East Somerset						
6	and North East Som	and North East Som	Cheltenham	Taunton Deane	Worcester	Taunton Deane						
7	Worcester	Taunton Deane	Worcester	York	Colchester	Scarborough						
8	Scarborough	Canterbury	Taunton Deane	and North East Som	Lancaster	Lancaster						
9	Taunton Deane	Scarborough	Scarborough	Cheltenham	and North East Som	Worcester						
10	Lancaster	Lancaster	Lancaster	Colchester	Cheltenham	Cheltenham						
11												
12												
13												
14												
	Census			Census								

- 1.39 It is clear from this analysis that the housing market in the City of York is increasingly dysfunctional, with a very steep level of house price growth in recent years leading to significant affordability challenges generating adverse outcomes for residents who need to access the housing market. The comparative analysis suggests that when compared against neighbouring Yorkshire districts, York has experienced the highest rate of house price growth over the period 1999 to 2016, at levels significantly above the national average at a rate higher than the national level of growth. Only Harrogate and Hambleton have higher house prices, whilst only Harrogate and Ryedale have higher affordability ratios.
- 1.40 Median rental levels are also the highest of all the comparator Yorkshire authorities and the City has the highest rate of change of overcrowded households.
- 1.41 The performance of York's housing market relative to comparable authorities further afield (Table 1.8) which share similar socio-economic characteristics also suggests that the local housing market is under stress, with York amongst the very worst performing districts regarding rates of change in house prices, absolute and relative changes in affordability, median rents, and the rate of change in overcrowded households and concealed families.
- 1.42 The Practice Guidance, as well as providing general economic principles, points towards such factors as indicating that additional supply, over and above that solely needed by demographic change, may need to be delivered in order to address affordability and to reverse adverse housing market trends within the HMA.

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City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	Mr
First Name	Jonathan	Steven
Last Name	Abbott	Longstaff
Organisation (where relevant)	Taylor Wimpey UK Ltd	ELG Planning
Representing (if applicable)		Taylor Wimpey UK Ltd
Address – line 1	C/O Agent	Gateway House
Address – line 2		55 Coniscliffe Road
Address – line 3		Darlington
Address – line 4		
Postcode		DL37EH
E-mail Address		steven@elgplanning.co.uk
Telephone Number		01325 469236

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Guidance note



Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

- Online via our website www.york.gov.uk/localplan.
- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)

3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

N/A

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes

No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Taylor Wimpey UK Ltd (TW) object to Policy SS2 as in view of their response to Policy SS1 the Local Plan fails to allocate sufficient land to meet its correctly calculated housing requirement, and to achieve this release further land from the Green Belt.

Policy SS2 also states that, *'to ensure that there is a degree of permanence beyond the plan period sufficient land is allocated for development to meet the needs identified in the plan and for a further minimum period of five years to 2038'*.

TW would welcome further clarification on this as the trajectory at Table 5.2 only runs to 2032/33. It is therefore not clear where the delivery in these years will come from.

In line with the Home Builders Federation (HBF) representations, TW suggest that the Plan period be extended to 2038 and in addition to that the Council must identify safeguarded land to meet longer-term development needs stretching well beyond the Plan period and to ensure that the Green Belt boundaries do not need to be altered at the end the development plan period.

Policy SS2 is therefore not sound as the proposed Green Belt boundaries are not justified and are not consistent with the requirements of NPPF.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Taylor Wimpey UK Ltd propose the following changes to the policy to make it sound:

- Extend the Plan period to 2038;
- Release further land from the Green Belt and make additional housing allocations to meet the correctly calculated housing requirement (1,150 dpa) with an appropriate flexibility buffer (at least 20%); and
- Identify additional safeguarded land for development beyond the Plan period.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

TW have fundamental objections to Policy SS2 as set out above on matters which need to be addressed as part of a Hearing session.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law. The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature

S Longstaff

Date

04/04/2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

From: WILLIAMS John [REDACTED]
Sent: 04 April 2018 17:34
To: localplan@york.gov.uk
Subject: Local Plan Consultation

Dear Sirs

I am writing in support of the draft Local Plan which is currently out for consultation. In particular, I support an annual housebuilding target of 867 new homes. I especially support the policy of building homes on brownfield sites and the decision not to safeguard land for future development.

I do not agree that the City is able to accommodate any more than 867 new homes each year, largely because the City's infrastructure would simply be unable to cope with the demands that would be placed on it. This particularly applies to the outer ring road: it is beyond the scope for discussion that this road is unable to cope even with the current demands that are placed on it.

I am particularly encouraged by the fact that those who are responsible for preparing the various drafts of the Local Plan have clearly listened to the feedback that has been provided by community groups, Parish Councils, evidence-based research from experienced consultants and individuals by dropping the earlier requirement for land to be safeguarded for future development. This will undoubtedly limit the prospect of urban creep and coalescence of rural villages. It will also help to protect the essential rural characteristics and heritage of the ancient villages on the outskirts of the City. I believe that the special protection that is afforded to the Greenbelt by the NPPF is properly and fully given effect to in the current version of the draft Local Plan and I fully support its adoption.

Yours faithfully

John S Williams
[REDACTED]

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Further information about us is available at www.pinsentmasons.com

From: Gillian Lodge [gillian.lodge@quod.com]
Sent: 04 April 2018 17:25
To: localplan@york.gov.uk
Subject: REPRESENTATIONS TO CITY OF YORK LOCAL PLAN PULBICATION DRAFT (FEBRUARY 2018) (REGULATION 19 CONSULTATION)
Attachments: 00. 04.04 - Local Plan Reps - Cover Letter.pdf; 03. ST15 Reps - March 2018 Comments_form_FINAL Para 2.5 signed.pdf; 04. ST15 Reps - March 2018 Comments_form_FINAL DP1 signed.pdf; 05. ST15 Reps - March 2018 Comments_form_FINAL SS1 signed.pdf; 06. ST15 Reps - March 2018 Comments_form_FINAL SS2 signed.pdf; 07. ST15 Reps - March 2018 Comments_form_FINAL SS13 signed.pdf; 08. ST15 Reps - March 2018 Comments_form_FINAL Para 3.62-3.68 signed.pdf; 09. ST15 Reps - March 2018 Comments_form_FINAL ST15 signed.pdf; 10. ST15 Reps - March 2018 Comments_form_FINAL SS21 signed.pdf; 11. ST15 Reps - March 2018 Comments_form_FINAL H1 signed.pdf; 12. ST15 Reps - March 2018 Comments_form_FINAL H3 signed.pdf; 13. ST15 Reps - March 2018 Comments_form_FINAL HW2 signed.pdf; 14. ST15 Reps - March 2018 Comments_form_FINAL HW4 signed.pdf; 15. ST15 Reps - March 2018 Comments_form_FINAL HW5 signed.pdf; 16. ST15 Reps - March 2018 Comments_form_FINAL HW6 signed.pdf; 17. ST15 Reps - March 2018 Comments_form_FINAL HW7 signed.pdf; 18. ST15 Reps - March 2018 Comments_form_FINAL ED3 signed.pdf; 19. ST15 Reps - March 2018 Comments_form_FINAL D1 signed.pdf; 20. ST15 Reps - March 2018 Comments_form_FINAL D3 signed.pdf; 21. ST15 Reps - March 2018 Comments_form_FINAL GI2 signed.pdf; 22. ST15 Reps - March 2018 Comments_form_FINAL GI6 signed.pdf; 23. ST15 Reps - March 2018 Comments_form_FINAL CC1 signed.pdf; 24. ST15 Reps - March 2018 Comments_form_FINAL CC2 signed.pdf; 25. ST15 Reps - March 2018 Comments_form_FINAL T2 signed.pdf; 26. ST15 Reps - March 2018 Comments_form_FINAL T4 signed.pdf; 27. ST15 Reps - March 2018 Comments_form_FINAL DM1 signed.pdf

Dear Sir

Please find attached correspondence from Tim Waring in relation to the above.

Regards



Gillian Lodge
PA/Office Manager
gillian.lodge@quod.com

Main: 0113 245 1243
 Mobile: 07711372942
 Direct: 0113 306 2276
www.quod.com

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Quod Limited, company number: 07170188 (England).

Registered Office: Ingeni Building, 17 Broadwick Street, London W1F 0AX

Our ref: Q70385/tw/gl
Your ref:
Email: Tim.waring@quod.com
Date: 4 April 2018



Local Plan
City of York Council
West Offices
Station Rise
York
YO1 6GA

By email

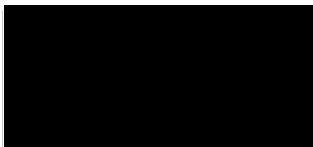
Dear Sirs

**Representations to City of York Local Plan
Publication Draft (February 2018) (Regulation 19 Consultation)**

On behalf of our clients, Langwith Development Partnership Limited, please find attached a list of documents which have been uploaded to the CYC DOQEX system in respect of the above.

For ease of reference, all Consultation Response Forms are also attached hereto.

Yours sincerely



Tim Waring
Director

enc

cc J Irwin Esq Langwith Development Partnership Limited
P James Esq Langwith Development Partnership Limited
R France Esq Langwith Development Partnership Limited





1. Representations to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (Quod).
2. Appendices to Representations to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (Quod).
3. City of York Local Plan Consultation Draft Response Form – Paragraph 2.5
4. City of York Local Plan Consultation Draft Response Form – Policy DP1
5. City of York Local Plan Consultation Draft Response Form – Policy SS1
6. City of York Local Plan Consultation Draft Response Form – Policy SS2
7. City of York Local Plan Consultation Draft Response Form – Policy SS13
8. City of York Local Plan Consultation Draft Response Form – Paragraph 3.62 – 3.68
9. City of York Local Plan Consultation Draft Response Form – Allocation ST15
10. City of York Local Plan Consultation Draft Response Form – Policy SS21
11. City of York Local Plan Consultation Draft Response Form – Policy H1
12. City of York Local Plan Consultation Draft Response Form – Policy H3
13. City of York Local Plan Consultation Draft Response Form – Policy HW2
14. City of York Local Plan Consultation Draft Response Form – Policy HW4
15. City of York Local Plan Consultation Draft Response Form – Policy HW5
16. City of York Local Plan Consultation Draft Response Form – Policy HW6
17. City of York Local Plan Consultation Draft Response Form – Policy HW7
18. City of York Local Plan Consultation Draft Response Form – Policy ED3
19. City of York Local Plan Consultation Draft Response Form – Policy D1
20. City of York Local Plan Consultation Draft Response Form – Policy D3
21. City of York Local Plan Consultation Draft Response Form – Policy GI2
22. City of York Local Plan Consultation Draft Response Form – Policy GI6 (including Allocation OS10)
23. City of York Local Plan Consultation Draft Response Form – Policy CC1
24. City of York Local Plan Consultation Draft Response Form – Policy CC2
25. City of York Local Plan Consultation Draft Response Form – Policy T2
26. City of York Local Plan Consultation Draft Response Form – Policy T4
27. City of York Local Plan Consultation Draft Response Form – Policy DM1

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

- Online via our website www.york.gov.uk/localplan.
- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text" value="2.5"/>	Policy Ref.	<input type="text"/>	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Paragraph 2.5 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to paragraph 2.5 (and Policy DP1), in order for this part of the Plan to be sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan (ST15), which is principally in the control of Langwith Development Partnership Limited. The soundness of this allocation (ST15) and the scale of planned housing provision and delivery, (paragraph 2.5 and Policy DP1), will determine the soundness of the whole Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature

 (Quod)

Date

4 April 2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

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Last Name		Waring
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Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

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Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	DP1	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Policy DP1 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to DP1, in order to make the Policy sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan (ST15), which is in the control of Langwith Development Partnership Limited. The soundness of this allocation and associated policies (including DP1) will determine the soundness of the whole Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

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Storing your information and contacting you in the future:

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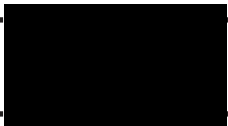
Retention of Information

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Your rights

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Signature		(Quod)	Date	4 April 2018
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¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

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City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

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Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
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Can I submit representations on behalf of a group or neighbourhood?

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

- City of York Local Plan Publication Draft
- Policies Map
- Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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4. (1) Do you consider the document is Legally compliant?

Yes No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	SS1	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Policy SS1 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to SS1, in order to make the Policy sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan (ST15), which is principally in the control of Langwith Development Partnership Limited. The soundness of this allocation (ST15) and the overreaching housing Policy SS1, will determine the soundness of the whole Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

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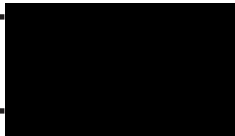
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Signature		(Quod)	Date	4 April 2018
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City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

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Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

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Yes

No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

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Proposed allocation ST15 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018). As a consequence the Green Belt boundary (the defined role is set out in Policy SS2) should be modified.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

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Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to ST15 (and the Green Belt boundary – Policy SS2), in order to make the proposed allocation (Langwith) sound.

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No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

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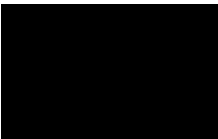
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Signature  (Quod) Date **4 April 2018**

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Last Name		Waring
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Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
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(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

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What does 'legally compliant' mean?

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	SS13	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed allocation ST15 and the associated Policy SS13 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to ST15 and SS13, in order to make the proposed allocation (Langwith) and Policy sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan (ST15), which is principally in the control of Langwith Development Partnership Limited. The soundness of allocation ST15 and associated Policy SS13 will determine the soundness of the whole Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

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Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

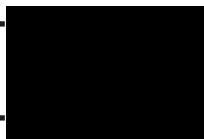
Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

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If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature  (Quod) Date **4 April 2018**

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

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- Online via our website www.york.gov.uk/localplan.
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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-

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Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes

No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text" value="3.62-3.68"/>	Policy Ref.	<input type="text"/>	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Paragraph 3.62 to 3.68 (inclusive) relate to Policy SS13 which is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018). Any changes to Policy SS13, may require consequent changes to the Explanation (at paragraph 3.62-3.68) of Policy SS13.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to ST13, which in turn may require consequent changes to paragraph 3.62-3.68 (inclusive) in order to make the proposed allocation (Langwith) sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan (ST15), which is principally in the control of Langwith Development Partnership Limited. The soundness of this allocation, Policy SS13 and associated Explanation (Paragraph 3.62-3.68), will determine the soundness of the whole Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

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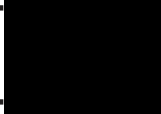
Retention of Information

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Signature  (Quod) Date **4 April 2018**

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City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

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Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

Guidance note

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What can I make comments on?

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Do I have to use the response form?

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Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

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Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	<input type="text"/>	Site Ref.	<input type="text" value="ST15"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed allocation ST15 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

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Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate at Appendix 14 the necessary changes to ST15, in order to make the proposed allocation (Langwith) sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan, which is principally in the control of Langwith Development Partnership Limited. The soundness of this allocation (ST15) will determine the soundness of the whole Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

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Storing your information and contacting you in the future:

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Retention of Information

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Signature

 (Quod)

Date

4 April 2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

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Do I have to use the response form?

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Can I submit representations on behalf of a group or neighbourhood?

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Do I need to attend the Public Examination?

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes

No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed Policy SS21 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to SS21, in order to make the proposed Policy sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan ST15, which is principally in the control of Langwith Development Partnership Limited. The soundness of this allocation and Policy SS21 will determine the soundness of the whole Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

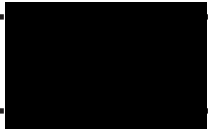
Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature  (Quod) Date **4 April 2018**

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1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

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Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	H1	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed Policy H1, where relating to ST15, is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

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Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to ST15 and Policy H1, in order to make the proposed allocation (Langwith) and Policy sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

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These representations relate to one of the key strategic development allocations of the Local Plan (ST15), which is principally in the control of Langwith Development Partnership Limited. The soundness of this allocation (and therefore Policy H1) will determine the soundness of the whole Local Plan.

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Part C - How we will use your Personal Information

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Retention of Information

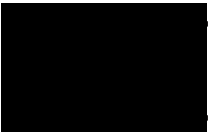
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Signature

 (Quod)

Date

4 April 2018

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

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Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes

No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

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(Complete any that apply)

Paragraph no.

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Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed Policy H3 would benefit from clarification (by referring to the SHMA prevailing at the time of any respective application), for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the required clarification to Policy H3.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan (ST15), which is principally in the control of Langwith Development Partnership Limited. The soundness of this allocation and the generic Policies applying to the development of the allocations (i.e. Policy H3), will determine the soundness of the whole Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²


Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

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Signature  (Quod) Date **4 April 2018**

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City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

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Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

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Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

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Representations received after this time will not be considered duly made.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes

No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed Policy HW2 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

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After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to Policy HW2, in order to make the proposed Policy sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan (ST15), which is principally in the control of Langwith Development Partnership Limited. The soundness of this allocation and generic policies relevant to the allocation (i.e. Policy HW2) will determine the soundness of the whole Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

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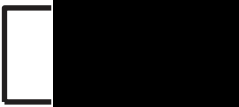
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Signature  (Quod) Date **4 April 2018**

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Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

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Do I have to use the response form?

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Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

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Part B - Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

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Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

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Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-

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Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	<input type="text" value="HW4"/>	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed Policy HW4 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

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Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to Policy HW4, in order to make the proposed Policy sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

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Part C - How we will use your Personal Information

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Signature

 (Quod)

Date

4 April 2018

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Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

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Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

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- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes

No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed Policy HW5 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to Policy HW5, in order to make the Policy sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan (ST15), which is principally in the control of Langwith Development Partnership Limited. The soundness of this allocation and generic policies relevant to the allocation (i.e. Policy HW5) will determine the soundness of the whole Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

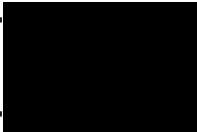
Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature  (Quod) Date **4 April 2018**

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

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Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-

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Representations received after this time will not be considered duly made.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	HW6	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed Policy HW6 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to Policy HW6, in order to make the proposed Policy sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan (ST15), which is principally in the control of Langwith Development Partnership Limited. The soundness of this allocation (ST15) and generic policies relevant to the allocation (i.e. Policy HW6), will determine the soundness of the whole Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

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Storing your information and contacting you in the future:

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Retention of Information

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Signature (Quod) Date

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² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

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ID reference:

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Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

Guidance note

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Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

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Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

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Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	HW7	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed Policy HW7 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to HW7, in order to make the Policy sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan (ST15), which is principally in the control of Langwith Development Partnership Limited. The soundness of this allocation (ST15) and the associated generic policies (i.e. HW7), will determine the soundness of the whole Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

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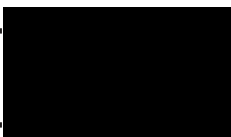
Retention of Information

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Signature  (Quod) Date **4 April 2018**

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² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

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Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

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Can I submit representations on behalf of a group or neighbourhood?

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	ED3	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed Policy ED3 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to ED3, in order to make the proposed allocation (Langwith) sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan (ST15), which is principally in the control of Langwith Development Partnership Limited. The soundness of this allocation (ST15) and Policy ED3 will determine the soundness of the whole Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

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City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

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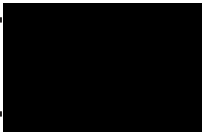
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Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
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Postcode		LS1 5SP
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Telephone Number		0113 245 1243

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

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5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

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(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	D1	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed Policy D1 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

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7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

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No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

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4.(3) Please justify your answer to question 4.(1) and 4.(2)

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As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input type="checkbox"/>	Justified	<input type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	D3	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

It is necessary for the Cultural Well-being Plan of Policy D3 to be defined for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to Policy D3, in order to make the Policy sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan (ST15), which is principally in the control of Langwith Development Partnership Limited. The soundness of this allocation (ST15) and associated Policy D3 will determine the soundness of the whole Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

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Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

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If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature

 (Quod)

Date

4 April 2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

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Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

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- Online via our website www.york.gov.uk/localplan.
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- In all libraries in York.

Part B - Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

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Effective – the plan should be deliverable over its period and based on effective joint working on cross-

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Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	<input type="text" value="G12"/>	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed Policy G12 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to Policy GI2, in order to make the proposed Policy sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan (ST15), which is principally in the control of Langwith Development Partnership Limited. The soundness of the allocation (ST15), and associated Policy GI2 will determine the soundness of the whole Local Plan.

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Part C - How we will use your Personal Information

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Storing your information and contacting you in the future:

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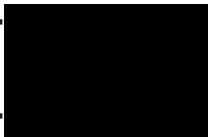
Retention of Information

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Signature  (Quod) Date **4 April 2018**

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² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

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City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

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ID reference:

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Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

Guidance note

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Do I have to use the response form?

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Do I need to attend the Public Examination?

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

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Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	<input type="text" value="G16"/>	Site Ref.	<input type="text" value="OS10"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed allocation OS10 (and associated Policy G16) is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

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Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to OS10 (see plan of Appendix 14), in order to make the proposed allocation and Policy G16 sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

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Part C - How we will use your Personal Information

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Storing your information and contacting you in the future:

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Retention of Information

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Signature  (Quod) Date **4 April 2018**

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

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City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

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Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
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Do I need to attend the Public Examination?

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

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Representations must be received by Wednesday 4 April 2018, up until midnight.
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Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes

No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed Policy is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to CC1, and it's inclusion in Policy CC2 ,in order to make the Policy sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

These representations relate to one of the key strategic development allocations of the Local Plan (ST15), which is principally in the control of Langwith Development Partnership Limited. The soundness of this allocation and polices affecting the allocation (i.e. CC1), will determine the soundness of the whole Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature

 (Quod)

Date

4 April 2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

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Do I have to use the response form?

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

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Yes

No

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5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed Policy CC2 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

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No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

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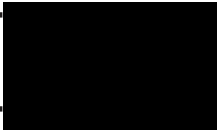
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Signature  (Quod) Date **4 April 2018**

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Last Name		Waring
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Address – line 2		Bond Court
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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

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Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	T2	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed Policy T2 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

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Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary changes to Policy T2, in order to make the Policy sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

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Signature

 (Quod)

Date

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Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The legal compliance of the Plan is disputed, as the appropriate evidence required to underpin the Plan is not presently available.

As all of the requisite evidence is not available, and the spatial implications of the Plan is not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-

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Representations received after this time will not be considered duly made.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	T4	Site Ref.	<input type="text"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Proposed Policy T4 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

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After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Refer to Representations to the City of York Local Plan Report (Quod, March 2018), which demonstrate the necessary evidence to support Policy T4 is not presently available.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

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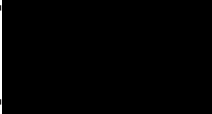
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1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Waring
Organisation (where relevant)	Langwith Development Partnership Limited	Quod Ltd
Representing (if applicable)		Langwith Development Partnership Limited
Address – line 1		Capitol
Address – line 2		Bond Court
Address – line 3		Leeds
Address – line 4		West Yorkshire
Postcode		LS1 5SP
E-mail Address		Tim.waring@quod.com
Telephone Number		0113 245 1243

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(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	<input type="text" value="DM1"/>	Site Ref.	<input type="text"/>
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Proposed Policy DM1 is not sound for the reasons outlined in the attached Representations to the City of York Local Plan Report (Quod, March 2018).

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Signature

 (Quod)

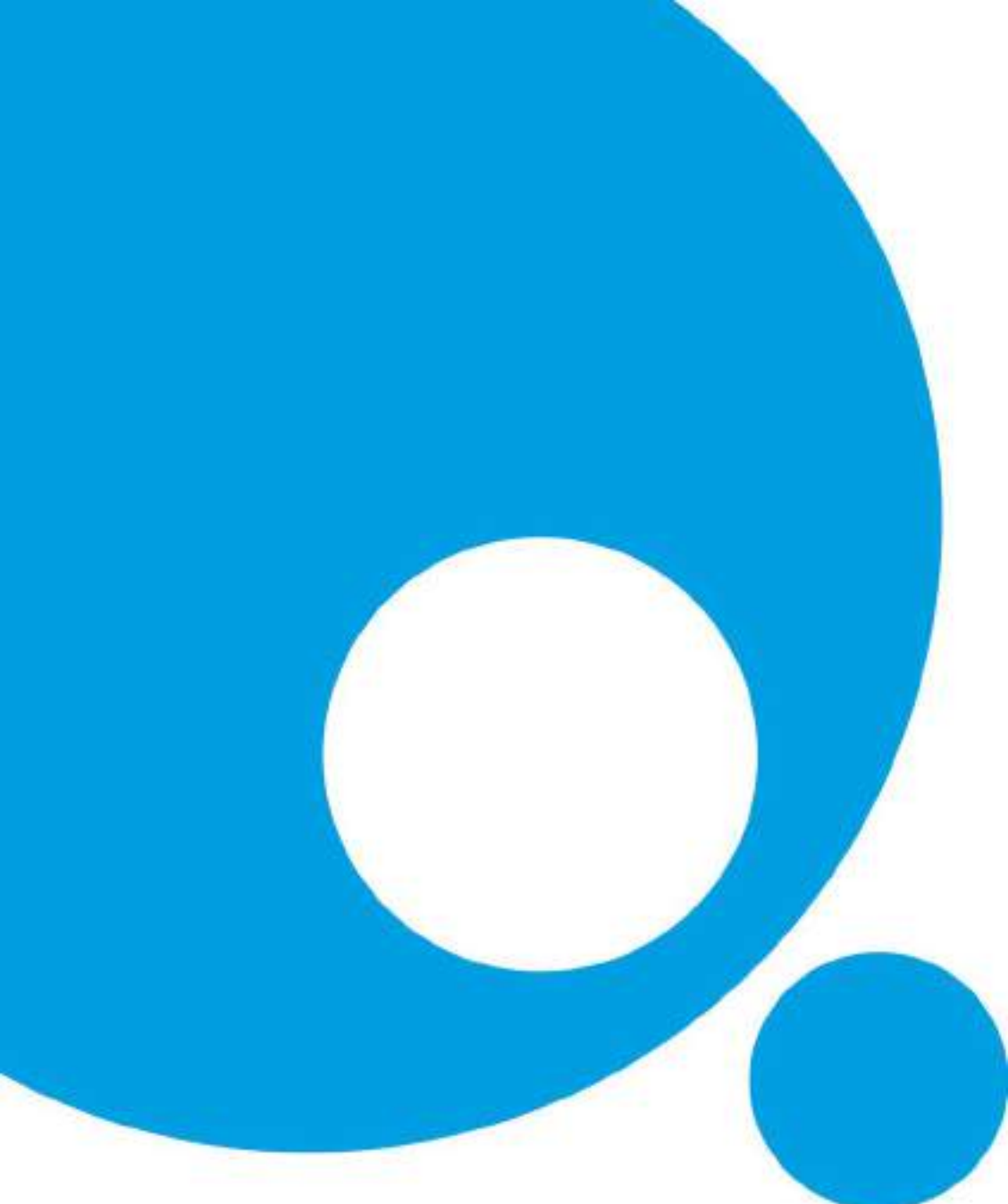
Date

4 April 2018

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**REPRESENTATIONS TO THE
CITY OF YORK LOCAL PLAN –
PUBLICATION DRAFT
FEBRUARY 2018 (REGULATION 19)**

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Appendices

Appendix 1	Langwith – A Sustainable Garden Village (Quod)
Appendix 2	Report on Delivery and Viability (Bidwells)
Appendix 3	Transport Appraisal (Lawrence Walker Ltd)
Appendix 4	Masterplan and Visioning Document (Barton Willmore)
Appendix 5	Landscape and Visual Assessment (Landscape Agency)
Appendix 6	Heritage Summary (FAS)
Appendix 7	Biodiversity Addendum Report (The Environment Bank)
Appendix 8	Policies Subject to the Representations by Langwith Development Partnership Limited
Appendix 9	Housing Trajectory
Appendix 10	Phase 1 Preliminary Risk Assessment (WSP)
Appendix 11	Flood Risk and Surface Water Management Technical Appraisal (WSP)
Appendix 12	Utilities and Energy Technical Assessment (WSP)
Appendix 13	Modifications Proposed to Policies (and Paragraphs):
	<ul style="list-style-type: none"> • Paragraph 2.5 • Policy: DP1 • Policy: SS1 • Policy: SS13 • Policy: H1 • Policy: HW2 • Policy: HW4 • Policy: HW5 • Policy: HW6 • Policy: ED3 • Policy: D1 • Policy: GI2

- Policy: GI6
- Policy: CC1
- Policy: CC2
- Policy: T2

Appendix 14 Modifications Proposed to Policies Map (Reg 19, 2018); Plans:

- Drawing No 9938 – ST15 Adjusted
- Drawing No 9000 – Strategic Site Access Road (to ST15)
- Drawing No 9945 – Site Boundary Plan (Revised ST15 and OS10)

Appendix 15 Review of CYC's OAN (2016)

1 Introduction

- 1.1 These representations are made on behalf of Langwith Development Partnership Limited (“LDP”). LDP has been formed by Sandby and the Oakgate/Caddick Group who control all the land required to deliver the new garden village known as Langwith. LDP’s purpose is to ensure that the proposed Langwith project will be delivered through the planning process culminating in the creation and development of a new garden village for York.
- 1.2 LDP have been working with City of York Council (“CYC”) over a number of years, to identify a suitable new settlement to help meet York’s housing needs. A brief overview of the history is set out in **Appendix 1**.
- 1.3 It is evident from **Appendix 1** that a new settlement in this part of York is considered appropriate in principle, and will deliver a wide range of planning benefits.
- 1.4 Throughout LDP’s engagement in the Local Plan process, the promoters have sought to identify a suitable and appropriate allocation, necessary to help meet the CYC’s housing needs.
- 1.5 Objections were raised by LDP to the two previous draft (Reg 8) Local Plans (produced in 2016 and 2017), in relation to their failure to address the full objectively assessed housing need. Notably, both earlier draft of the Plan significantly underprovided for the City’s housing needs, having regard to their objectively assessed needs set out in their SHMAs (2016 and 2017). LDP support this objective in principle.
- 1.6 It is noteworthy that the previous draft Plans, and the Plan to which these representations relate (Publication Draft, February 2018) (Reg 19, 2018 Local Plan) sought/seek to set a spatial vision that requires York’s current and future population housing needs to be met within the York Local Authority area (see Policy DP1 of the Reg 19, 2018 Local Plan).
- 1.7 It is evident, as these representations go on to demonstrate, the Plan is presently unsound in that it does not meet the current/future housing needs arising in the City.
- 1.8 A considerable body of technical and environmental work has been carried out by LDP, and this has been presented to CYC over the course of the past few years. This work is outlined in previous submissions to CYC which form part of these representations, and include the following:
- 1.8.1 Site Promotion – Planning Document (September 2016). These were representations to the City of York Local Plan – Preferred Sites Consultation (June 2016) (“2016 Representations”).
- 1.8.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017). These were representations to the pre-publication draft Local Plan (Reg 18 Consultation) (“2017 Representations”).
- 1.9 These previous representations demonstrated that the boundary of ST15 currently proposed by CYC was unsound¹, but could be made sound through changes². Following both sets of representations, Officers concluded the same, and recommended to CYC’s Local Plan Working Group (“LPWG”) that the boundary of the proposed new settlement should be modified (see **Appendix 1**).

¹ The boundary of ST15, Reg 18 2016 and Reg 18 2017 is identical to ST15 Reg 19, 2018.

² The boundary of Langwith presented at Reg 18, 2016 and Reg 19, 2017 stages was larger than now proposed in these representations. Consequently, the findings of the technical and environmental assessments are appropriate.

- 1.10 The representations contained in this report (and supporting evidence) supports the previous evidence, subject to one adjustment³ and demonstrates the following:
- 1.10.1 The Reg 19, 2018 Plan is unsound, as it fails to accommodate the City of York’s projected housing needs as currently presented at paragraph 2.5, and in Policy SS1, Policy H1 and Table 1 of the draft Plan. The Plan is consequently not positively prepared, nor justified in this regard.
 - 1.10.2 Site allocation ST15 is not sound, on the grounds it is not justified as a consequence of 1.9.1 above, is not positively prepared It is not effective (as it is undeliverable) and being unsustainable, it is inconsistent with national policy.
 - 1.10.3 It remains sound to help meet the housing needs of the City, that a new settlement is required and appropriate in the south east of the City.
 - 1.10.4 ST15, once adjusted to accommodate Langwith, is an appropriate allocation (herein referred to as Langwith Reg 19, 2018 and shown on the Plan at **Appendix 14**) and sound.
 - 1.10.5 There is a lack of key relevant and up to date evidence to justify the spatial aspects of the Plan, as well as the infrastructure required to deliver the spatial vision of the Plan.
- 1.11 These representations are specific to a range of policies contained in the emerging Local Plan (City of York Local Plan – Publication Draft, February 2018 (Reg 19)), and these are listed in **Appendix 8**.
- 1.12 These representations have been prepared in the context of current Government Policy and Guidance (NPPF and NPPG), although there are proposed changes to Government Policy and Guidance which are aimed at, amongst other matters, better supporting the Government’s housing growth agenda. Whilst these proposed changes to the NPPF and NPPG are currently draft, and subject to consultation, little weight can be given to them. In particular, it is of note that Annex 1 of the draft NPPF (paragraph 209) suggests that the NPPF is not intended to take effect for the purposes of examining plans, where such have been submitted before six months after the date of the final publication of the NPPF. This Local Plan is intended to be submitted in May. LDP, however, reserve the right to modify these representations in the event that changes are made to the NPPF and NPPG.
- 1.13 In considering the soundness of the various policies of the emerging Plan, these representations have regard to the four tests set out in paragraph 182 of the NPPF. Namely, they must be:
- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*

³ LDP no longer propose to include a secondary school, following advice from CYC’s Education Officers that a secondary school was not required on site, as existing secondary schools have capacity of ability to accommodate more pupils through expansion.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”

1.14 The structure of this report is outlined below:

- 1.14.1 Section 2 – This section demonstrates that the spatial strategy of the Reg 19, 2018 Plan is unsound, principally given that the Plan does not address the objectively assessed housing needs of the City. Moreso, meeting the other development needs of the City, such as economic development, is possibly unjustified as these are linked to housing growth.
- 1.14.2 Section 3 – Why ST15 is unsound, and will render the spatial strategy of the Local Plan unachievable.
- 1.14.3 Section 4 – Why Langwith is sound and will help meet the City’s housing needs, thus helping make the Plan sound overall.
- 1.14.4 Section 5 – This section refers to the necessary changes to the Plan’s principle policies that are required to make it sound.
- 1.14.5 Section 6 – Representations to other policies of the draft Plan that are related to principle aspects of these representations.

2 Objections to the Spatial Strategy

- 2.1 It is LDP's case that the Reg 19, 2018 Plan is founded on an unsound spatial strategy in relation to housing, which consequently undermines the strategy for other aspects of the Plan (eg, economic development, and infrastructure delivery).
- 2.2 The spatial strategy in relation to housing provision is not justified, given that all available evidence demonstrates that the housing need of the City is considerably above that proposed to be planned. Consequently, it is not effective, as the housing need cannot be met, and is not positively prepared as it does not meet the objectively assessed development requirements.
- 2.3 Draft Policy DP1: York Sub Area sets the "Development Principles" for the York Area, and requires it to fulfil its role as a key economic driver, strengthen its shopping and leisure offer, and meet the housing needs of the City within the Local Authority area itself. The Plan fails to meet these principles for the reasons outlined below.

Housing Need

- 2.4 CYC has persistently underperformed in the delivery of new housing, failing to keep a pace with the City's housing need. There has been a long standing acceptance by CYC that in order to meet their housing needs, a new settlement has been required in the south east of the City. The need for a new settlement in this part of the City is long-established, and without a new settlement in this location of the City, CYC will be unable to sustainably meet their housing needs.
- 2.5 CYC have an acute housing shortage, and there is a need to significantly boost the supply of housing. This need is immediate, and urgent. It has been long recognised, in the work commissioned by CYC dating back to 2013
- 2.6 The Council commissioned work (from Arup) in 2013 to identify their objectively assessed need, and housing targets. The work undertaken at that time identified an annual average need to provide 1,090 dwellings per annum over the period 2031.
- 2.7 In September 2014, Arup undertook further work which suggested an annual requirement of 891 units per annum. More recently in 2015, the Council commissioned a Report from Arup's relating to CYC's objectively assessed housing need, based on the sub-national household projections at that time. This suggested that the number of households in York was expected to grow by 17% between 2012 and 2031, by 14,404 dwellings, equating to a housing delivery requirement of 809 dwellings per annum.
- 2.8 In autumn 2015, the Council commissioned a joint (with adjoining Councils) Strategic Housing Market Assessment (SHMA), which was published in June 2016 which took account of the demographic data available at that time. This suggested that the full objectively assessed need for housing over the period 2013 to 2032 was 841 dwellings per annum.
- 2.9 Following the publication of the SHMA, a new set of sub-national population projections (2014 based) was published, which demonstrated a higher level of population growth than that suggested by the 2012 based versions which underpinned the SHMA's. Modelling these revised figures demonstrated an annual need for 898 dwellings per annum during the periods 2012-2032, i.e. c7% higher than that in the SHMA.

- 2.10 It is noteworthy that the work undertaken in these SHMAs did not take account of any previous delivery underperformance, and there was a high level of unmet housing need that was not accounted in the above figures. The figures therefore outlined above represent an underestimate of what was required to be planned for.
- 2.11 LDP commissioned a review of CYC's OAN in 2016, and this demonstrated that the housing need in York was at least 976 dwellings per annum (**Appendix 15**).
- 2.12 CYC's most recent strategic housing market assessment ("SHMA") published in 2017 identified York's OAN for housing as being 953 dwellings per annum. Officers recommended to their LPWG in July 2017 to accept these recommendations. The LPWG went against the Officers' recommendations for no apparent good reasons, and consequently, the Reg 19, 2018 Plan plans for only 867 dwellings per annum, ie, a significant reduction below CYC's own assessment of housing need.
- 2.13 Notably, Officers recommended to the LPWG in January 2018 that the Plan should accommodate housing allocations that were capable of meeting this greater housing need. The LPWG determined not to accept Officers advice, without any sound planning reason.
- 2.14 Furthermore, the Government's draft methodology for assessing housing need (published in Autumn 2017), suggests that the housing need for York is in fact 1,070 dwellings per annum.
- 2.15 It is clear that the housing need is substantially greater than that which the Reg 19, 2018 Plan is currently planning for (ie, at least c10% more than CYC's latest SHMA, 2017); in this respect the Plan is unsound, as its foundation is unjustified by evidence.
- 2.16 Moreso, given the pressing housing need to deliver housing in the short term, there is a strong compulsion to ensure that there is an allocation for a new settlement in south east York which is truly deliverable. ST15 does not presently represent a sound and deliverable allocation without the adjustment set out in these representations.

Spatial Strategy – An Unsound Approach to Housing and Other Development Needs

- 2.17 It is clear that the planned provision for less housing that is needed renders the spatial strategy of the Plan's objective of satisfying its own needs unsound. Without any opportunity to displace this housing need to adjoining local planning authorities, it is evident that the objectively assessed housing needs of the City cannot be met. Moreso, the housing need is directly linked to the ability to achieve economic growth, and consequently if the population of the City cannot be accommodate within the City, then the economic growth projections cannot be achieved. Similarly, the retail and leisure growth similarly cannot be achieved.
- 2.18 Paragraph 158 of the NPPF specifically recognises that it is necessary that Plan's "...strategies for housing, employment and other uses are integrated..." (Quod emphasis). This is not the case with draft Local Plan.
- 2.19 In view of the above, paragraph 2.5 and Policy SS1: Delivering Sustainable Growth for York is not positively prepared, nor is it justified and the housing (and other development) needs are not deliverable without substantial change to the Policy.
- 2.20 In view of the above and the lack of a proportionate evidence base, the Plan's foundations and, therefore spatial strategy is unsound, as it is not based on an "...adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area..." (paragraph 158 of the NPPF).

- 2.21 Moreso, given that the Reg 19, 2018 Plan’s infrastructure (such as transport, education, community, as well as other) is directly related to housing growth, these aspects of the Plan are presently also unjustified and not positively prepared.
- 2.22 It is a requirement of Plans to “*cater for housing (and other development) demand, and the scale of housing supply necessary to meet this demand*” (NPPF, paragraph 159), and co-operate with adjoining LPAs to “*...provide the land and infrastructure necessary to support current and project future levels of development*” (NPPF, paragraph 181), where it is reasonable to do so and consistent with achieving sustainable development. There is no agreement with any adjoining authorities for CYC to meet their development needs beyond the City.
- 2.23 In view of the above, paragraph 2.5 of the Plan’s Vision, Policy SS1: Delivering Sustainable Growth for York and Policy H1: Housing Allocation are presently unsound, and require amendment.

Evidence Base

- 2.24 At the time of preparing the representations, the available evidence base underpinning the Reg 19, 2018 Plan is in part of some considerable age, lacking in robustness and in some cases not available.
- 2.25 At present, the following key aspects of the Plan’s evidence is not publicly available, and it is unclear how the spatial strategy for certain aspects of the Plan has been formed. For the purposes of these representations, the fundamental missing evidence includes:
- 2.25.1 Viability.
 - 2.25.2 Infrastructure delivery programme.
 - 2.25.3 Education need.
 - 2.25.4 Transport modelling.
 - 2.25.5 Biodiversity assessment, including surveys.

ST15 – An Unsound Allocation

- 2.26 ST15 is unsound, for a range of reasons, most notably:
- 2.26.1 It is not viable, given the significant level of abnormal costs, required to make the allocation ready for development.
 - 2.26.2 Regardless of the fact the allocation is not viable, the delivery rates assumed in the Plan’s trajectory are unrealistic. Consequently, even the underestimated housing need would not be deliverable.
 - 2.26.3 In transportation terms, there is no evidence to demonstrate that it can be practically and viably accessed.
 - 2.26.4 The site cannot be effectively, or viably, served by public transport.

2.26.5 The biodiversity impacts, which have not been assessed nor quantified by CYC in their evidence base, are likely to be unacceptable. Natural England (“NE”) have raised objection to ST15, and no evidence (or plans) have been put forward by CYC to address the objections of NE. The adjustments proposed are made in order to address NE’s objections, and assist in the deliverability of the allocation.

2.27 Furthermore, the site contains third party ownerships, which will complicate the ability to deliver the site.

2.28 Section 3 goes on to explain in more detail why ST15 is unsound, and needs adjusting (principally in relation to its geographical coverage) to make it sound.

OS10 – An Unsound Allocation for Biodiversity Mitigation

2.29 Policy GI6 is concerned with providing new open space for both recreation and amenity. Additionally, it identifies a strategic allocation for nature conservation associated with ST15 Reg 19, 2018 (site designation OS10).

2.30 Site designation OS10 extends to 192 ha, and as evidenced in **Appendix 7** it is:

2.30.1 Unjustified by any evidence that demonstrates that it satisfies the biodiversity objectives of the Reg 19, 2018 Plan of delivering “*net gain to, and help to improve, biodiversity*” (Policy GI2).

2.30.2 The Policies Map anomalously indicates the strategic link road for ST15 Reg 19, 2018 to be in a technically unacceptable location. The only appropriate location for this link road (see the reasons in **Appendix 3**) is through the land designated as OS10 (see **Figure 2.1** below). This would have significant effects on the biodiversity merits of this land (see **Appendix 7**).

2.30.3 It incorporates land within the ownership of parties outside CYC, Sandby or Oakgate or their willingness to include their land within a biodiversity off-setting strategy is unknown.

2.30.4 Policy GI6 suggests the area is suitable for recreation and amenity. As explained in **Appendix 7**, recreational areas should be restricted, in order to achieve the biodiversity off-setting that this area is intended to deliver.

Figure 2.1: OS10 and Access Road to A64



2.31 Consequently, the land designated as OS10 is not sound, as it is not justified, and it is not deliverable (ie, it is not effective).

Langwith – Why is the Proposed Allocation Sound?

2.32 It is demonstrated in these representations that Langwith is:

- 2.32.1 Justified by appropriate and relevant evidence, having regard to the economic, social and environmental characteristics and prospects of the area.
- 2.32.2 It is an effective allocation, in that it is deliverable, and will help to meet the City's unmet housing needs.
- 2.32.3 It has been positively prepared in order to meet, in part, the objectively assessed development and infrastructure requirements of the City.

2.32.4 It is consistent with National Policy in that it will enable the delivery of sustainable development.

2.33 Section 4, and **Appendix 1**, provide evidence on the deliverability of Langwith, and its appropriateness having regard to various evidence.

Summary

2.34 In summary, it is demonstrated that Langwith is sustainable, satisfying the three limbs of sustainability, and being appropriate for allocation.

2.35 In contrast ST15 is not effective or justified and its allocation has not been positively prepared. Being unsustainable, it is contrary to national policy.

3 Why is ST15 Unsound?

- 3.1 This Section explains why ST15 is unsound. Most notably, it demonstrates that:
- 3.1.1 It is unviable.
 - 3.1.2 It leads to biodiversity impacts which have not been quantified, but are likely to be unacceptable.
 - 3.1.3 The highway infrastructure is incapable of providing safe and appropriate access.
 - 3.1.4 It is of insufficient scale to deliver the housing needed in York.
- 3.2 It also contains third party ownerships which will complicate the ability to deliver a new settlement. Additionally, it involves the delivery of new open space (OS10) which is necessary biodiversity mitigation, although the nature and scale of OS10 has not been justified. Furthermore, OS10 is also in third party control, further undermining its delivery prospects.

Viability

- 3.3 At the time of preparing these representations, no evidence of viability has been provided by CYC in relation to allocation ST15, nor the wider Plan. Bidwells, on behalf of LDP, have reviewed the deliverability of ST15, and have identified a number of fundamental challenges to its delivery. Most notably, the following areas have been identified:
- 3.3.1 There are significant levels of abnormal costs required to make the site ready for development. Most notably:
 - 3.1.3.1 A new highway junction is required to the A64 and given that this is the only proposed point of access, it will need to be delivered prior to occupation of any property. This will create an unsustainable cashflow burden in the early years of the development.
 - 3.2.3.1 Highway works are required to improve Grimston Bar, and these will be required at an early stage of the development, placing further pressure on cashflow.
 - 3.3.3.1 It is likely that widening works will be required to the A64, between the junction and the new Grimston Bar interchange, and these will carry substantial costs.
 - 3.4.3.1 The burden of these costs, before revenue from the scheme will create an unworkable and, therefore, an undeliverable development.
 - 3.3.2 Utility upgrades will be required, and these works will be necessary before the first plot is saved. Again, this will damage the project's cashflow.
 - 3.3.3 Significant ecological mitigation is required, in order to achieve a net improvement on biodiversity, and to address NE's objections, although, as **Appendix 7** demonstrates, it is not necessary to provide this mitigation five years before development commences as the Plan (Policy SS13) suggests. These mitigations/compensations have not been quantified by CYC in the evidence underpinning the Plan. Moreso, the cost of these ecological works, and the significant cost of acquiring land, also damages the scheme's viability.

- 3.4 Bidwells consider the evidence presently available that ST15 would not generate the competitive return required for development to happen and therefore cannot be considered to be viable, as a rational landowner would not make their land available for development at the values that would be delivered by developing ST15.
- 3.5 As recognised in paragraph 173 of the NPPF, in order for development to happen, it must be capable of generating competitive returns to both landowner and developer. In this case, given these abnormal costs, it is Bidwell's view that a reasonable land price for the landowner would not be generated, and consequently, the land would not be released for the development of the scheme, and the allocation would, therefore, not be delivered.
- 3.6 LDP reserve the right to provide further evidence on viability, upon receipt and review of the CYC's viability evidence.

Delivery and Absorption of New Homes at ST15

- 3.7 The Plan suggests that ST15 has the propensity to deliver 2,200 homes by the end of the Plan period. Given the significant works required to open up the site, which is remote from any highway network, delivery of the site is unlikely to start for a considerable period of time. Therefore, even on an optimistic assumption that the first sales occur in 2022, this would mean that a period of only 11 years of the Local Plan would remain, requiring an annual delivery rate of 200 units.
- 3.8 For the reasons outlined in Bidwells' report (**Appendix 2**) the Plan's delivery trajectory of 2,200 units from ST15 during the Plan period (to 2032/2033) is overly ambitious, and unrealistic.
- 3.9 Failure to deliver housing at the rate suggested in the Plan (draft Policy SS13) will mean that CYC will not be able to meet their housing targets, which for the reasons outlined are in fact an underestimate of the objectively assessed housing need.

Land Ownership

- 3.10 ST15 is made up of three principal land ownerships, namely, LDP, and Messrs Handley. There is no formal relationship between (i) LDP and (ii) Handley, and there is a risk that the third party may not bring their land forward to participate with LDP in the promotion of the site.
- 3.11 In the event that sensible terms cannot be agreed with Handley, then there is a risk that the land will not come forward.
- 3.12 Additionally, the delivery of ST15 is required to provide a significant area of land for new open space (identified in the Plan as OS10). This area is claimed to be required in order to support the ecological mitigation of ST15 itself. This land is not within the control of Sandby or Oakgate, and is in the control of a further third parties, as shown in **Figure 2.1**. CYC's evidence base fails to establish that the land is available for development and so it is not clear whether this land is available. Without this land, ST15 could not be delivered, as this is considered by CYC to be integral to the delivery of ST15 (Reg 19).

Biodiversity Impact

- 3.13 ST15 has a significant number of constraints on biodiversity that would need to be addressed if the allocation is capable of meeting CYC's own policy requirements of net biodiversity gain.

- 3.14 NE made representations to ST15 as part of the Reg 18 Plan, noting an objection to the allocation. As there have been no changes to ST15 since the Reg 18 Plan, NE's objections, therefore, remain. It is important to note that the Langwith proposals take account of the objections made by NE, and accommodate them in the design of an extensive mitigation and compensation programme (**Appendix 7**).
- 3.15 The key biodiversity constraints and problems of ST15, which have been fully addressed under the Langwith proposals are as follows:
- 3.15.1 The layout fragments the airfield and hence substantially reduces the biodiversity value of the remaining parts. Having built development positioned in the middle of the airfield, over a significant area, would act as a blockage to movement of wildlife populations between the two parts, east and west of the development.
- 3.15.2 In addition, there would need, in any event, to be two buffers on the western most boundary of ST15 with the airfield, as well as the eastern most boundary and increases the risk that both sides of the airfield would be disturbed should people transgress into those areas. Having one full half of the airfield incorporated into a biodiversity management plan, as planned for Langwith, significantly retains the biodiversity value and is easier to manage leading to greater effectiveness of the conservation/offsetting measures.
- 3.15.3 If a secondary road access is required for ST15, this would be through the central part of the airfield coming from Elvington in the east. The access road layout would require significant land-take of the SINC covering the airfield and because it would traverse the entire eastern half of the airfield, would lead to fragmentation and disturbance of the northern and southern parts of the eastern airfield. This is not the case for Langwith, as the entire western half of the airfield is retained and there would be no infrastructure required, thereby leaving the entire area undisturbed under a long-term management regime to the benefit of the areas biodiversity.
- 3.15.4 The ST15 allocation significantly reduces the size of the western half of the airfield with direct consequences of a reduction in abundance and species complement, hence an overall decline in biodiversity will ensue as a result of the development land-take.
- 3.15.5 It is understood that ST15 has not been informed by ecological surveys, nor has it taken account of the Government backed biodiversity impact accounting metric. Whilst an area has been set aside for compensation habitat (designation OS10), it is understood that the extent of the requirement for compensation land has not been determined, nor the type of habitat to be created, nor the means of acquiring the required compensation land (which is in third party hands), nor a method of financing its conservation management.
- 3.15.6 The area set aside for compensation habitat (OS10) is the area where the proposed new link road from ST15 to the A64 is required (see **Figure 2.1** before and **Appendix 3**).

Highways

- 3.16 There is no evidence presented by CYC on the highway implications of ST15. Lawrence Walker Ltd have undertaken a high level appraisal of ST15 (**Appendix 3**) and have concluded that:
- 3.16.1 The traffic modelling undertaken to date by CYC is inadequate, does not identify locations where the network would be overloaded, nor what mitigation is required to overcome any adverse highway impact.

- 3.16.2 There is no evidence to demonstrate that the existing A64 is wide enough to safely accommodate ST15 at two lanes, it is likely that widening will be required, which in turn will have a significant cost burden on the allocation.
- 3.16.3 CYC's traffic modelling does not explore the use of Elvington Lane, as a potential second point of access. If Elvington Lane is proposed for a second point of access, it is already demonstrated in this Section that this will have significant biodiversity impacts, which the Plan does not off-set or mitigate against.
- 3.16.4 The Policies Map suggests that the strategic link road, linking ST15 to the A64, will be built to the east of Common Lane, which would require demolition of the existing overbridge. It would also be close to Grimston Bar.
- 3.16.5 The proposed location for the link road is both unviable and unsafe, and for the reasons set out in **Appendix 3** will need to be located on the western side of Common Lane.
- 3.16.6 Relocating the link road to the west side of Common Lane would route it through OS10, thereby conflicting with the biodiversity mitigation that this seeks to deliver.
- 3.17 The site cannot be adequately served by public transport, and would not be commercially viable for two principal reasons:
- 3.17.1 ST15 is not big enough to support what would need to be at least a ten minute frequency bus service in isolation,
- 3.17.2 There is no requirement within the Plan to co-join ST15 with public transport initiatives at the University of York (as promoted in Policy SS22). As a result, the opportunity to generate a combined revenue stream to support an extension of the Grimston Bar park and ride, serving both sites could well be lost.

Too Small to Deliver the Housing Need in York

- 3.18 The scale of housing need in the City far exceeds that which is planned in the draft Local Plan, and there is a need to significantly increase planned housing provision to meet the City's needs.
- 3.19 Section 2 sets the context for housing need in the City. It is evident that the housing need of York is presently not addressed through the Plan. In fact, it is considerably below that identified in CYC's SHMA, as well as that suggested by applying the Government's draft methodology for assessing housing need, or that suggested in the OAN review commissioned by LDP in 2016 (**Appendix 15**).
- 3.20 It is notable that Officers recommended to CYC's LPWG in January 2018 the need to increase the scale of housing allocations, in order to address the City's true housing need. The LPWG determined to not increase the allocations, rendering the Plan unsound in this respect.
- 3.21 Moreso, for the following reasons, the Plan clearly will not be able to satisfy the City's housing needs:
- 3.21.1 ST15 is the largest allocation in the Plan, and for the reasons outlined in these representations is undeliverable.
- 3.21.2 ST15, even if it was deliverable, would not be able to deliver the housing trajectory indicated in the Plan (ie, 2,200 units by the end of the Plan period).

- 3.22 For those reasons above, it is unsound for the Plan to rely upon ST15, given that it is the single largest strategic allocation within the Plan.
- 3.23 The Plan's approach to meeting the City's housing needs is unsound. Consequently, it is important that the allocation is adjusted so as to make development of this new community deliverable, and capable of better meeting the City's housing need.

Conclusion

- 3.24 As a consequence of the evidence contained in this Report ST15 is clearly unsound, being unjustified and ineffective.
- 3.25 As a consequence of the Plan not being based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, it has not been positively prepared. It is, therefore, inconsistent with national policy, and will not enable the delivery of sustainable development in accordance with the policies in the NPPF.

4 Langwith – A Sound Allocation

- 4.1 LDP have identified a sound allocation that will respond better to CYC’s objectively assessed housing needs, will provide a justified and effective allocation and consequently one that can be deemed to have been positively prepared in light of the above issues.
- 4.2 CYC Officers have supported an almost identical boundary to that of Langwith Reg 19, 2018, and this has been recommended to both CYC’s LPWG in July 2017 and January 2018 by Officers, on the basis that it was a sustainable and appropriate allocation, and would help meet the City’s objective assessed housing need.
- 4.3 Langwith accommodates part of ST15, but differs in the following key areas:
- 4.3.1 It extends development further to the east, along brownfield land (Elvington Airfield) by circa 103 ha towards Elvington Lane. The eastern most part of this extension will include strategic landscaping. This eastern area will enable a secondary access to be created, linking the development to Elvington Lane.
- 4.3.2 Removing part of the draft allocation ST15 from the western part of the Airfield, and putting that area (along with the remainder of the western section of the Airfield) back to a natural state (c55 ha).
- 4.3.3 Exclusion of land in third party ownership (Messrs Handley), ie, that directly to the north of the Airfield.
- 4.4 The changes to the boundary of the allocation are made for a number of reasons, which are outlined in these representations. Most notably, Langwith involves a substantial increase in brownfield landtake, the brownfield component of Langwith is 103 ha, whilst ST15 is only 46 ha. The balance between the brownfield/greenfield landtake is shown in **Figure 2.2**.

Figure 2.2 - Greenfield:Brownfield Landtake



- 4.5 In addition, Langwith would also put back a considerable area of previously developed land (in the order of 55ha) on the western part of the Airfield, to a natural greenfield state for the purposes of biodiversity enhancement (see **Appendix 7**).
- 4.5.1 The number of new homes delivered by Langwith will be in the order of 4,000, ie, an increase of circa 700 homes over that which can be provided by ST15, Reg 19, 2018.

- 4.6 A full analysis of Langwith is contained in **Appendix 1**. This demonstrates the development potential of the site, its sustainability credentials and deliverability. It also outlines the key merits of Langwith, when measured against ST15, which are explained below:
- 4.6.1 It will assist CYC in better meeting their acute housing needs (including affordable housing) and providing a greater range and choice of homes to build a more sustainable community.
 - 4.6.2 A greater number of new homes can be delivered within the plan period, than ST15 (event if that allocation it was proven to be viable).
 - 4.6.3 Improved viability of the scheme (and therefore its deliverability), given the significant infrastructure costs per residential unit.
 - 4.6.4 The creation of two vibrant, mixed-use local centres which will improve the quality of the settlement and the overall 'sense of community'.
 - 4.6.5 Provide a significant area of public open space on-site.
 - 4.6.6 Enabling viable and delivery access to the site at the start of the development (via Elvington Lane), which will ensure the scheme has good prospects of delivery.
 - 4.6.7 Increased patronage of public transport infrastructure, ensuring both viable and frequent public transport infrastructure can be supported. Walkable neighbourhoods will be provided where a significant proportion of homes are within 400m of a bus stop.
 - 4.6.8 Support for community infrastructure, such as health facilities, and generating sufficient population to warrant onsite provision of two primary schools (totalling up to 5 forms of entry – "FE").
 - 4.6.9 Being viable to deliver contributions to secondary schooling elsewhere within the City.
 - 4.6.10 Deliver major biodiversity enhancement areas, with a long-term management of almost 200 ha of specially established habitat, which combined with the 46 ha Heslington Tillmire SSSI, will create a major ecological asset for the City.
 - 4.6.11 Increase the brownfield land-take (more than twice that of ST15) and deliver a net gain in greenfield land.
 - 4.6.12 Generating retail and leisure expenditure by the new residential population, which will benefit local businesses and support community uses within the new garden village to reinforce its identity and function in its own right.
 - 4.6.13 Ensure the viability of on-site combined heat and power, making the site energy sustainable.
 - 4.6.14 Creating links with the Airfield Museum, and ensuring its legacy for the future. The promoters are working in collaboration with the Air Museum to enhance the museum and secure its future legacy, including the delivery of an arboretum.

- 4.6.15 Improving links with the University of York (“the University”) and Elvington Business Park, with the opportunity for synergies with them. There is the potential for public transport, as well as electric and autonomous vehicle, links between the University and Langwith.
- 4.6.16 The ability to provide appropriate and safe highway access from the A64, which will benefit all users of the local highway network in this area.
- 4.6.17 Respecting the heritage assets of the area, and most notably the setting of the City of York.

Appropriateness

- 4.7 The technical and environmental appropriateness of Langwith is summarised in **Appendix 1**. This is further updated by the evidence in the other **Appendices** to this report.
- 4.8 It has been long recognised that this part of York, and notably the Green Belt within which it falls, has the capacity to accommodate a new settlement. Langwith is consistent with the objectives of Green Belt policy, in light of the pressing housing need within York.
- 4.9 **Appendix 1** contains an assessment of the Green Belt implications of Langwith. It notes that the area taken up by Langwith does not perform any specific Green Belt function. Moreso, it would create a new settlement that provides a defensible and logical Green Belt boundary, which has the ability to endure beyond the Plan period.
- 4.10 The masterplan for the site (**Appendix 4**) demonstrates how the site can be developed sympathetically and appropriately, having regard to its environmental capacity. The settlement’s form has been modified from that previously proposed to address matters raised by Historic England (“HE”), with the development drawn back from the site’s north western sector. **Appendix 6** considers this matter further, demonstrating the scheme could be accommodated without substantial harm to the special characteristics and setting of the historic City.
- 4.11 **Appendix 7** demonstrates that Langwith can deliver a significant net gain in biodiversity; this can be achieved through the following ecological measures:
 - 4.11.1 The creation of a habitat enhancement area (“HEA”) of 46.43 ha;
 - 4.11.2 The creation of an ecological off-setting area of 90.66 ha;
 - 4.11.3 The managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96 ha.
- 4.12 It is noteworthy that the ecological mitigation is indicative only at this stage, and the detail of it will be determined at planning application stage. Nevertheless, it demonstrates that a net gain can be achieved.
- 4.13 It is also demonstrated in **Appendix 7** that Langwith’s approach to biodiversity responds to all of the areas of objection to ST15 Reg 18, 2017 raised by NE.
- 4.14 Langwith can create a significant ecological asset for the residents of Langwith, as well as the City.

- 4.15 **Appendix 3** demonstrates that Langwith will be accessed via a new junction on the A64 and a secondary access via Elvington Lane, and its technical appropriateness has previously been demonstrated (and is re-appraised in **Appendix 3**). The technical aspects of the new junction to the A64 have previously been endorsed in principle by Highways England.
- 4.16 A secondary access to the University of York is also available, which would help to alleviate transport pressure on the Grimston Bar junction to the north east, which already suffers congestion and is expected to do so further in the future.
- 4.17 The secondary access via Elvington Lane, which has the benefit of aiding the scheme's viability (enabling early housing delivery, which is not possible with ST15) and reducing demand along the A64.
- 4.18 **Appendices 10** and **11** demonstrates the environmental appropriateness of Langwith Reg 19, 2018 having regard to ground conditions and flood risk respectively, whilst **Appendix 12** demonstrates the utilities infrastructure capability of accommodating a new garden village.

Viability

- 4.19 **Appendix 2** demonstrates the deliverability of Langwith. Its delivery and viability has been the subject of a full development appraisal by LDP's agents (Bidwells).
- 4.20 Most notably, there are a number of fundamental differences between Langwith and ST15 that render it deliverable in contrast to ST15. This includes:
- 4.20.1 The inclusion of the eastern part of the Airfield, means that a great proportion of previously developed land will be included in the allocation, and more importantly for delivery reasons would allow a second access point to the site from Elvington Lane. This would enable the site to be opened up for the early delivery of homes. In contrast, ST15 requires a new link road to be developed from the A64 to the new settlement, prior to the delivery of any new homes.
- 4.20.2 The scale of work required to the A64, and Grimston Bar, is less than that compared with ST15. This is explained in the work at **Appendix 3**.
- 4.20.3 Creating a second access point with direct road frontage onto Elvington Lane will make the site more visible to prospective purchasers of homes, and improve the prospects of sales.
- 4.20.4 Moreso, the creation of two distinct entrances to Langwith (ie, via Elvington Lane and the new access onto the A64) will allow more sales outlets to operate simultaneously without competing against each other.
- 4.21 The combination of the above factors, will improve the ability of the site to deliver and exceed the target yield (Policy SS13 and the Plan's housing trajectory at figure 5.1 and 5.2 of the Plan of 2,200 homes within the Plan period. It is important to note that despite the Plan's target yield for this Site, given it is unviable, it will presently make no contribution to housing delivery. Without the adjustments proposed, the Plan will simply be unviable to meet the City's housing requirements.
- 4.22 The adjustment of ST15 will delivery over 4,000 houses; this will allow the impact of the abnormal costs to be absorbed more effectively, given the landowners a return which is projected by Bidwells to be competitive and at a level which a rational landowner would be prepared to release land for development.

- 4.23 If funding became available in the future, from such services as HIF, LDP would work with CYC to secure future funding to assist future expedited delivery of homes.

Delivery of Langwith

- 4.24 Langwith is in the sole control LDP, and delivery of the Garden Village on this site can start in the early part of the Plan period. Both parties are committed to working collaboratively to deliver this allocation, and it is an entirely achievable development.
- 4.25 Approximately circa c2,400 of these homes could be delivered over the Plan period at Langwith, as shown in the delivery trajectory in **Appendix 9**. This is in excess of the target yield in the Local Plan for ST15 (ie, 2,200 homes), even if it was viable (which it is demonstrated not to be the case).

Delivery Trajectory

- 4.26 **Appendix 9** contains a delivery trajectory which demonstrates that in the order of 2,400 new homes can be achieved on Langwith during the Plan period. This includes a range of tenure types.
- 4.27 This yield of housing delivery during the Plan period is in excess of that indicated in Policy SS13, and given the evident housing needs within the City, the adjusted allocation has substantial merit.

Soundness

- 4.28 Given the evidence presented to date for Langwith, the allocation of the area shown in **Appendix 4**, is fully justified and effective, and ensuring that the Plan in respect of this allocation is deliverable.
- 4.29 In order to meet the objectively assessed development and infrastructure needs of the City, it can be concluded that Langwith would mean that if the allocation is modified as proposed, this aspect of the Plan can be concluded to have been positively prepared and consistent with national policy aimed at delivering sustainable development in accordance with the policies in the NPPF.

5 Modifications to the Policies Relating to the Spatial Vision of the Plan

- 5.1 This Section considers the various changes required to the following policies, in order to ensure that the Plan is sound (having regard to the floor tests of paragraph 182 of the NPPF).

Policy DP1 – York Sub Area (and Explanatory Paragraph 2.5)

- 5.2 Draft Policy DP1 sets out the role and function that the York Sub Area will perform. It sets a number of key aims, and most notably in respect of these representations it requires:

5.2.1 The housing needs of the City of York to be met within the Local Authority Area.

5.2.2 The City’s historic and natural environments to be conserved and enhanced, whilst having regard to meeting its wider economic importance in the Region.

- 5.3 For the reasons outlined earlier in these representations, the Plan does not meet the City’s full objectively assessed housing needs of the City. As a consequence, the Plan is presently unsound in this aspect.

- 5.4 Given the inextricable link between housing growth and other development and infrastructure needs, it is LDP’s view that the economic infrastructure aspects of DP1 will need to be reviewed.

- 5.5 In order to make the Plan sound, it is necessary to increase the provision of suitable and deliverable sites, and of particular interest to LDP is the need to modify site allocation ST15.

- 5.6 Draft Policy DP1’s aim of conserving and enhancing the City’s natural environment is presently undermined in respect of site allocation ST15. The Plan is consequently unsound in this respect, and requires modification (as proposed in these representations, namely a revision to allocation ST15 to reflect the Langwith proposals).

- 5.7 It is recognised by CYC that in order to meet the development needs of the City, a new settlement is needed in the south east part of CYC’s administrative boundary. For clarification Policy DP1 should refer to this new settlement.

- 5.8 In order to make the Policy (and paragraph 2.5) effective, justified (by the available evidence) and positively prepared, various amendments are proposed to the Policy and these are contained in **Appendix 13**. The amendments propose to meeting the minimum housing provision to that contained in CYC’s SHMA 2017. Should more up to date evidence be available prior to the Examination of the Plan, LDP reserve the right to comment on the efficacy of the housing provision further.

Policy SS1 - Delivering Sustainable Growth for York

- 5.9 Draft Policy SS1 outlines the sustainable growth objectives of the City. It requires housing provision at an annual rate of 867 new dwellings over the Plan period (to 2032/2033) and post the Plan period (to 2037/2038). For the reasons outlined in these representations, this annual provision is an under-estimate of the true housing requirements of the City, and consequently, this policy is unjustified by evidence, and therefore unsound.

- 5.10 Failing to address the true housing needs of the City, will undermine the City’s ability to meet its objectives of building strong sustainable communities, whilst addressing the housing and community needs of York.

- 5.11 Underproviding housing will perpetuate the City's failing housing market, and will not meet the housing needs of both the current and future populations.
- 5.12 The draft Policy sets give guiding spatial principles for the location of development. Site allocation ST15 fails four of the principles (bullets 1, 2, 3 and 5) for the reasons outlined in these representations.
- 5.13 Moreso, the Policy requires development sites to be identified having regard to their deliverability and viability. For the reasons outlined above, there is no viability evidence presently available that demonstrates how this Policy has been justified. Moreso, these representations demonstrates that ST15 itself fails this aspect of Policy SS1.
- 5.14 For the reasons previous raised, and the integral relationship between housing growth and development needs, a further review of the economic growth aspects (first bullet) of Policy SS1 will need to be reviewed.
- 5.15 Given that it is recognised that in order to meet the housing needs of the City in the south east quadrant through a new settlement, specific reference to this is required.
- 5.16 Changes to the Policy are proposed, as shown in **Appendix 13**.

Policy SS13 – Land West of Elvington Lane

- 5.17 Policy SS13 supports the allocation of the proposed new garden village in the south eastern part of the City (ie, objection have been made to ST15 and these are not re-presented here). The Policy, however, sets a number of criteria requiring the allocation to be developed in a sustainable and master planned manner, and delivered in accordance with a range of criteria. Whilst many of the criteria are not objectionable (if applied to an appropriate site allocation), objections are made to the following which are either unnecessary or unduly burdensome.
 - 5.17.1 The Explanation to the Policy, given the recommended changes to the boundary of ST15, as referred in Section 4. Notably, the scale and delivery period of the houses should be changed to reflect the revised ST15.
 - 5.17.2 Criterion (iii) should be modified to recognise that both high design standards are achieved and the nature of development reflects the settlement characteristics.
 - 5.17.3 Criterion (v) and (vi) should be modified to reflect matters raised in **Appendix 7**.
 - 5.17.4 Criterion (vi) advises that a new Nature Conservation Area (NCA) will be provided as shown on the Policies Map. The NCA is, however, not designated on the Policies Map. See below for further explanation.
 - 5.17.5 Criterion (vii) requires ecological mitigation and compensatory measures to be delivered, five years prior to the commencement of any development. This is unnecessary and for the reasons outlined below, unduly burdensome.
 - 5.17.6 There is no justification for secondary education provision on site. In discussions with Officers at CYC, LDP have been informed that current forecasts and projections, suggest extra capacity can be achieved at existing schools in the City, albeit no evidence is available at present.

5.17.7 The scale of open spaces proposed as part of SS13 (and Policy OS10) is not justified, not supported by any sound evidence, and falls in the control of various third parties, rendering it potentially unavailable and therefore not deliverable.

5.17.8 The strategic road link linking the garden village with the A64, and providing its primary access, is indicated on the Policies Map on an alignment that is technically undeliverable. The Policies Map should be updated to show the appropriate alignment (see Plan at **Appendix 14**).

Nature Conservation Area (NCA)

5.18 The Policies Map does not designate an NCA, although it does allocate an area of Open Space (OS10 – shown on **Figure 5.1** below).

5.19 It is believed that the area OS10 on the Policies Map is intended as an NCA to compensate for the impacts from the development of ST15. However, if this land is intended to be used as public open space, its value to nature conservation and hence the biodiversity impacted by ST15 that it is required to compensate for, will be wholly compromised.

5.20 OS10 would need to be designated for nature conservation and have no public access across it unless managed along specific routes. This is the case with the Langwith compensation areas of the HEA and the western part of the runway (as shown in **Figure 5.1**).

Figure 5.1: OS10 Allocation and Ecological Mitigation of Langwith



OS10: Langwith



OS10: Reg 19, 2018

5.21 The scale of OS10 largely equates to, the combined HEA and western runway areas. This scale is, however, not quantified since no survey(s) has been carried out to quantify the specific impacts resulting from the development of the ST15 area in order to calculate the size and configuration of the open space and hence the habitat to be created and enhanced.

5.22 In addition, OS10 fails to take account of the land required to gain satisfactory access to ST15 and the Langwith scheme along the north west boundary with the A64. This has been evaluated by the Langwith proposals and included in the biodiversity accounting assessment and compensated for accordingly.

5.23 Finally, there are various land parcels identified in OS10 is in the control of a third party, whose intention is unknown (see **Figure 12** at **Appendix 1**).

Ecological Mitigation – Delivery

- 5.24 Criterion (vii) requires ecological mitigation and compensatory measures to be delivered five years prior to the commencement of any development. This is unduly burdensome and not necessary given that the development of the allocation can be phased.
- 5.25 The requirements of Criterion (viii) appear to be contradicted by the Explanation (paragraph 3.68) of the Policy which suggests that biodiversity measures need to be implemented from “*year 1 to allow for the successful establishment of habitat prior to the commencement of the development*”.
- 5.26 It is unclear what is meant by “year 1”, and as a consequence, clarification is required in respect of the timing for ecological mitigation and compensation.
- 5.27 In the case of Langwith, it is envisaged that the creation of the HEA and other biodiversity off-setting would be started before commencement of development.
- 5.28 A phased but continuous approach to habitat creation, enhancement and management is therefore envisaged in a manner that compensates for biodiversity impacts in advance of the biodiversity impacts taking place. This does not mean that all the creation and enhancement works have to take place before any development commences. To do so would push the delivery trajectory of this allocation back significantly, rendering the already underestimated housing requirement of the Plan unachievable.
- 5.29 It is, therefore, not justified to delay delivery of the development in the manner suggested in the draft SS13. More so, to delay delivery in this way will have a significant impact on the delivery of much needed housing during the Plan period, as the housing delivery trajectory for this site would be pushed back significantly.
- 5.30 Changes to Policy SS13 are outlined in **Appendix 13**. Consequent changes to reflect modifications to Policy SS13, should be made to paragraphs 3.62-3.68 of the Explanation to this Policy

Strategic Site Access (“SSA”)

- 5.31 It is demonstrated in Section 6 that the indicated position for the SSA as shown on the Policies Map is inappropriate and technically unsound. Furthermore, it involves third party land, complicating its delivery. It should, therefore, be identified in the alternative alignment shown on the plan at **Appendix 14**.

Other Matters

- 5.32 In previous drafts of the Plan the airfield was designated as a Candidate SINC as a result of the fact that sufficient access had not been gained in order to more specifically quantify the ecological interest of the area of the airfield. Within the airfield are two designated SINC’s, one on the eastern part of the airfield and a smaller one on the western part of the airfield, both designated for botanical (grassland) and other interest features. The Langwith proposals resulted in development on the eastern SINC but effective compensation requirements were calculated (see the Biodiversity Accounting Assessment Report, February 2017) leading to the identification of the area of compensation land required.
- 5.33 The Policies Map for SS13 now identifies the entire airfield as a SINC with an area of wet grassland under a Countryside Stewardship agreement with a neighbouring farmer to the south of the airfield identified as a “candidate” SINC.
- 5.34 There is a lack of clarity about the extent of open space (OS10) identified, and whether this has been qualitatively assessed as a means of compensating for the impacts on the airfield SINC affected by development, rather than having been quantitatively assessed, as has been undertaken with the Langwith proposals.

- 5.35 Other text changes are proposed to aid the Policy's clarity.
- 5.36 As presently drafted, Policy SS13 (and the linked allocation ST15) are entirely unsound, and require fundamental changes to make them sound. Moreso, given that the Policy supports the largest strategic housing site within the Plan, this renders the entire Plan unsound, unless the allocation is modified.
- 5.37 In this respect, modifications to the Policy as outlined above and in these representations, including modifying the boundary of the allocation, will make this aspect of the Plan sound.

Policy H1 - Housing Allocations

- 5.38 For the reasons previously expressed in relation to the Plan's under-provision of housing land required to meet the City's objectively assessed housing needs, LDP object to Policy H1, as the housing allocations are insufficient to meet the housing needs.
- 5.39 Most notably, Sandy & Oakgate object to Policy ST15, in terms of the estimated yield and trajectory of the allocation, which is unrealistic.
- 5.40 For the reasons previously outlined, this allocation is not deliverable, and consequently, its yield is unrealistic and without fundamental change (to reflect the Langwith proposals), this Policy and the Plan as a whole is unsound.
- 5.41 In order to make the policy sound, modifications are required to the Policy as outlined in **Appendix 13**.

Policy GI2 – Biodiversity and Access to Nature

- 5.42 This Policy aims to conserve and enhance the City's biodiversity, and requires all developments to meet a range of objectives. It is inappropriate for the objectives to be applied only "*where appropriate*", and all development should be required to meet the nine objectives set out in the Policy.
- 5.43 Changes to the Policy are outlined in **Appendix 13**.

Policy GI6 - New Open Space Provision

- 5.44 This draft Policy supports the provision of open space on all residential developments. On strategic sites specific open space provision has been identified, including, a new area for nature conservation as part of the proposed allocation under SS13 (ST15). This open space (OS10) is identified in the Policy as being "indicative". Objections have already been outlined to this specific open space allocation and these representations make no further comment at this point.
- 5.45 There is a conflict between the stated reasons for the policy, which is to provide for open space for "recreation and amenity", while the designation of OS10 is solely for biodiversity off-setting. It is noted in **Appendix 7** that the biodiversity off-setting area should be managed, and general public access highly restricted, in order to achieve the biodiversity merits.
- 5.46 There is no evidence supporting the scale, or location of OS10, and there are demonstrable constraints in its delivery (land ownership, highway infrastructure required to serve ST15 and consequently no justification for it).
- 5.47 Changes are required to the policy and the Policies Map, as shown in **Appendix 13** and **14** in order to make this Policy and OS10 designation sound.

6 Representations to Specific Policies

- 6.1 LDP make representations to a range of policies of the Local Plan (see **Appendix 8** for the full list), in light of the preceding representations.
- 6.2 The NPPF requires Local Plans to be based on adequate, up to date and relevant evidence (paragraph 158). Presently, the draft Local Plan is not based upon the necessary evidence base.
- 6.3 At the time of submission of these representations, there remains a lack of appropriate evidence to underpin some of the policies. Consequently, LDP reserve their right to make further representations in due course should further evidence be provided. For example, there is no evidence on the viability of the Plan, the transport modelling of the Plan's allocations or ecological survey evidence.
- 6.4 The spatial approach of the Plan is not currently justified by an appropriate evidence base and it, therefore, fails the requirements of paragraph 158 of the NPPF, given the lack of an "*adequate, up to date and relevant evidence*".

DP2 – Sustainable Development

- 6.5 Draft Policy DP2 sets a number of principles for development in the City including, inter alia:
 - 6.5.1 Addressing the housing and community needs of York's current and future population.
 - 6.5.2 Conserving and enhancing York's green infrastructure, including biodiversity.
 - 6.5.3 Delivering a fundamental shift in travel, and prioritising public transport and access by modes alternative to the car.
 - 6.5.4 Improving the strategy highway network capacity.
- 6.6 For the reasons outlined in these representations, site allocation ST15 fails these objectives, and in order to be made sound, allocation ST15 requires adjustment.

Policy SS2 - The Role of York's Green Belt

- 6.7 Draft Policy SS2 is concerned with safeguarding of York's Green Belt, and setting an appropriate boundary. These objections demonstrate that the Green Belt boundary should be changed in respect of the site allocation ST15 and that the boundaries proposed (for the Langwith allocation) are readily defined, logical and appropriate to protect the remainder of the City's Green Belt.
- 6.8 The changes proposed to ST15 will ensure that there is a degree of permanence to the Green Belt boundary enduring beyond the Plan period. The appropriateness, however, of the Green Belt boundary, and its degree of permanence extending beyond the Plan period, can only be determined by reference to the City's ability to meet its true development needs.
- 6.9 As a consequence of the Plan, not satisfying the City's full objectively assessed needs, it is uncertain whether the Green Belt boundary has been appropriately set to meet needs of the City during the Plan period, and beyond.
- 6.10 For these reasons, the proposed Green Belt Boundary is not sound, and should be modified in relation to ST15 as shown on the Plan at **Appendix 14**.

Policy SS21 - Land South of Airfield Business Park, Elvington

- 6.11 LDP do not object to the extension to the Airfield Business Park but request that the Policy has specific recognition of the Business Park's ability to link with Langwith, given the close relationship of both allocations.

Policy SS22 – University of York Expansion

- 6.12 LDP do not object to the expansion of the University of York ("UoY") proposed in this Policy, and note that the University are seeking a larger expansion than proposed in the Local Plan. LDP do not object to this larger expansion, where it can be proven to be sound.
- 6.13 LDP support Criterion (viii) of the Plan that requires the access through an enhanced junction of the A64 (shared with ST15) to be explored. There are clear benefits for the University to have restricted/limited private vehicle access onto/off the A64, as well as public transport linkages between Langwith and the University (**Appendix 3**, paragraph 3.06).

Policy H2 - Density of Residential Development

- 6.14 LDP do not object to the draft policy's objective of making efficient use of land, by applying appropriate densities. However, the densities proposed should be used as a guide only, and applied flexibly, and determined on a site by site basis.

Policy H3 – Balancing the Housing Market

- 6.15 LDP do not object to the objective of delivering a balanced housing market across the Plan period, and delivering a mix of housing dependent upon identified needs.
- 6.16 As needs may change during the Plan period, it is necessary that the Policy is flexible enough to respond to changing circumstances, and has regard to the need prevailing at the time of any planning application.
- 6.17 The draft Policy's flexibility in this respect is supported. However, it would aid the application of the Policy if it referred to the SHMA applying at the time of consideration of any planning application.

Policy H10 - Affordable Housing

- 6.18 LDP do not object to the Plan's objective of maximising affordability across the housing market, and the differentiation between development typologies and their affordable housing "targets".
- 6.19 LDP do not object to the use of "targets" and support the Policy's recognition that where viability is proven, these targets should be relaxed.

Policy HW2 - New Community Facilities

- 6.20 This draft Policy requires applications for strategic residential developments to be supported by an audit of existing community facilities, their capacity, and identification, of the need for new more expanded community facilities required to meet the needs of "*existing and future occupiers*".
- 6.21 LDP object to the Policy's requirement that development should provide for the needs of existing residents. It is a well-established principle of planning that development should only mitigate the impacts of the development itself.
- 6.22 It is not appropriate for the Plan to derogate the responsibility of assessing the community infrastructure of the City to individual applications. It is the responsibility of the Plan to assess the quality and capacity of infrastructure, and for it to plan for this infrastructure accordingly (paragraph 162 of the NPPF).

6.23 It is inappropriate to set policies in a Plan that are not supported by adequate, up to date and relevant evidence, and therefore not justified. There is presently no evidence base to support the infrastructure required by this Policy HW2, it is, therefore, not positively prepared and inconsistent with national policy. Consequently, LDP reserve the right to comment further on this and other similar policies (HW4, HW5 and HW6) once this evidence is available.

Policy HW3 - Built Sports Facilities

6.24 This draft Policy is similar to HW2, albeit it is concerned with ensuring that built sports facilities are provided on all developments, in order to “*meet the needs of future occupiers*” only. LDP do not object to this Policy as a consequence.

Policy HW4 - Childcare Provision

6.25 This draft Policy is concerned with childcare provision, and requires new strategic sites to audit existing facilities, and identify increased demand which is to be incorporated on site, where it is viable and deliverable.

6.26 It is not appropriate for the Plan to derogate the responsibility of assessing the community infrastructure of the City to individual applications. It is the responsibility of the Plan to assess the quality and capacity of infrastructure, and for it to Plan accordingly (paragraph 162 of the NPPF).

6.27 It is inappropriate to set policies in a Plan that are not supported by adequate, up to date and relevant evidence. There is presently no evidence base to support the infrastructure required by this Policy HW4, and it is, therefore, not justified. It is, therefore, not positively prepared and inconsistent with national policy. Consequently, LDP reserve the right to comment further on this Policy once this evidence is available.

Policy HW5 - Healthcare Services

6.28 This draft policy requires healthcare facilities to be provided, where development places additional demands on services beyond their existing capacity. It requires any new primary care facilities to be accessible to the population it serves.

6.29 LDP do not object to this policy, especially on strategic sites, such as Langwith.

6.30 However, it is not appropriate for the Plan to derogate the responsibility the responsibility of assessing the community infrastructure of the City to individual applications. As already demonstrated, it is the responsibility of the Plan to assess the quality and capacity of infrastructure, and for it to plan accordingly (paragraph 162 of the NPPF).

6.31 It is inappropriate to set policies in a Plan that are not supported by adequate, up to date and relevant evidence. There is presently no evidence base to support the infrastructure required by this Policy HW5, and it is, therefore, not justified. It is, therefore, not positively prepared and inconsistent with national policy. Consequently, LDP reserve the right to comment further on this Policy once this evidence is available.

Policy HW6 - Emergency Services

6.32 This Policy supports the development of new emergency service facilities, where they are required, and it requires them to be provided in appropriate locations to meet necessary response times. Specific sites are identified.

- 6.33 There is, however, a notable contradiction in the Policy, where it is suggested that this infrastructure is still to be determined in further consultation. As with other policies referred above, it is inappropriate to set policies in a Plan which are not supported by adequate, up to date and relevant evidence, and it is, therefore, not justified. It is, therefore, not positively prepared and inconsistent with national policy
- 6.34 There is presently no evidence base to support the infrastructure required by Policy HW6. Consequently, LDP reserve the right to comment further on this Policy once this evidence is available.
- 6.35 It is notable, however, that there is a discrepancy in the Policy, which requires additional “spoke” facilities at “ST15: Land West of Wigginton Road”. It is understood that this site reference should be ST14, and consequently should be modified.
- 6.36 If the Policy is referring to ST15, LDP object to it, on the lack of evidence presently available for the need for a spoke facility.

Policy HW7 - Healthy Places

- 6.37 This draft Policy is concerned with delivering “healthy places” in residential schemes. It is suggested in the Policy that a statement is required that explains a range of design principles, and it is respectfully suggested that these matters are properly addressed through a Design & Access Statement, and do not require a separate statement.
- 6.38 The Policy requires all new strategic sites to be supported by a health impact assessment (“HIA”), and whilst it is suggested that these should be “*completed prior to the submission of a planning application*”, it would be more appropriate for the HIA to be submitted with planning applications, which demonstrate how the scheme has taken account of the impacts (both through mitigation and compensation).

Policy ED3 - Campus East (of the University)

- 6.39 This Policy is concerned with the continuing expansion of the University of York, and specifically it’s Eastern Campus. LDP do not object to this expansion, so long as it can be proven that it does not cause any undue impact on the existing environment and infrastructure, and where it does, that it can be adequately accommodated through mitigation.
- 6.40 Most notably, LDP respectfully request that the Policy recognises the synergies that can be achieved in terms of access, public transport, waste and energies, to the Eastern Campus in the same way as allocation ST27 (see **Appendix 13**).

Policy D1 - Place Making

- 6.41 This Policy is concerned with place making and LDP do not object to its objectives of improving poor environments, whilst enhancing existing qualities.
- 6.42 The Policy requires developments to be refused where they fail to take account of the City’s special qualities or fail to make a positive design contribution to the City, or cause any damage to its character and quality. This aspect of the Policy is contrary to the general principles of planning that any adverse harm should be assessed against any wider benefits (see paragraph 14 of the NPPF). The Policy should be modified to recognise the appropriate planning balance where, harm is assessed against a proposal’s benefits.

Policy D2 - Landscape Setting

- 6.43 The draft Policy supports development that encourage a broad range of landscape and setting aspects. LDP do not object to this Policy.

Policy D3 - Cultural Provision

- 6.44 This draft Policy supports cultural well-being, and the provision of cultural facilities in developments. LDP do not object to the policy.
- 6.45 The Policy requires all assessments to be supported by a “Cultural Well-being Plan” (“CWP”). It is noteworthy that such plans are not defined in the Policy, and these are deferred to a definition to be outlined in a future SPD.
- 6.46 As there is no planning definition of a CWP, it will be important for the SPD to be prepared and adopted alongside the Local Plan.
- 6.47 LDP do not object to provision of a CWP so long as it is proportionate and commensurate with the implications of the development. We reserve the right to comment further should the SPD be drafted prior to the Examination.

Policy GI1 - Green Infrastructure

- 6.48 This Policy seeks to conserve and enhance the green infrastructure of the City. LDP do not object to the policy, and in particular they do not object to the provision of access to green infrastructure, whilst mitigating pressure on existing natural habitats and the wildlife and flora they support.
- 6.49 LDP support the requirement that developments should create a “net gain” to biodiversity, noting that Langwith can achieve this objective. There is no evidence supporting the Plan that demonstrates ST15 can achieve a “net gain”.

Policy GI3 - Green Infrastructure Network

- 6.50 This draft Policy is concerned with maintaining and improving a network of green infrastructure. LDP do not object to the Policy’s approach that this can be achieved through a variety of means.

Policy CC1 - Renewable and Low Carbon Energy Generation and Storage

- 6.51 This draft Policy requires new buildings to achieve reduction in carbon emissions, with a minimum required reduction of 28%, unless this is not viable. There is no evidence to support the 28% threshold being applied locally, and without it the Policy is unjustified.
- 6.52 Whilst LDP do not object to reduction in carbon emissions in new buildings, this aspect (ie, the first paragraph) of the Policy should be included in Policy CC2.

Policy CC2 - Sustainable Design and Construction of New Development

- 6.53 This draft Policy is concerned with sustainable design and construction of new development, but unlike CC1 (and CC3 – see below) does not recognise feasibility or viability as a genuine planning consideration. As such, the Policy may stymie necessary development. LDP object to this Policy on this basis, and suggest amendments as shown in **Appendix 13**.

Policy CC3 - District Heating and Combined Heat and Power Networks

- 6.54 This draft Policy concerned with district heating and combined heat and power networks, and requires development to proceed in accordance with a heating and cooling hierarchy. LDP do not object to this Policy, given that it also recognises that viability is a genuine planning consideration or alternative approaches may be more sustainable.

Policy T1 - Sustainable Access

- 6.55 LDP do not object to the Plan’s approach to sustainable access, and the need to minimise travel. The objectives of the Langwith masterplan, and the Access & Connectivity Strategy associated with it, support the minimisation of travel demand (and providing access by alternative modes to the car).
- 6.56 For the reasons previously outlined, there is an inherent conflict between Policy T1 and ST15, which does not support Policy T1’s objectives of delivering frequent high quality public transport, or providing safe and appropriate access to existing adopted highways.

Policy T2 - Strategic Public Transport Improvements

- 6.57 This Policy supports the infrastructure enhancement set out in the Local Transport Plan No 2 (LTP3) and other investment programmes. Notably, in relation to LDP objections, it requires a dedicated public transport and cycle route linking the new settlement with suitable access on York’s highway network.
- 6.58 LDP do not object to this proposition, but recommend that it should be applied to the University too, given the potential for public transport synergies between the new settlement and the University (as well as its future expansion).

Policy T4 - Strategic Highway Network Capacity Improvements

- 6.59 This draft Policy supports the delivery of various highway enhancements, promoted as part of the LTP3 and other investment programmes. Most specifically, it supports the improvement to the Grimston Bar junction, including approach roads, and notes that more detail is contained in the Infrastructure Delivery Plan (“IPD”).
- 6.60 The IDP is currently not available, and LDP reserve the right to comment further on this Policy following the publication of the IDP.

Policy T5 - Strategic Cycle and Pedestrian Network Links and Improvements

- 6.61 This draft Policy is concerned with improving strategy cycle and pedestrian network links and supports the delivery of links identified in the LTP3 and other investment programmes. LDP wish it to be made clear that Langwith will support such improvements.

Policy DM1 - Infrastructure and Developer Contributions

- 6.62 This Policy requires all new developments to be supported by appropriate infrastructure (physical, social and economic) where necessary. It requires developers to make contributions to infrastructure that is deemed necessary by CYC to support future development in York. Most notably, it requires contributions towards strategic infrastructure as part of all developments. The strategic infrastructure will be set out in the IDP. This is not publicly available.
- 6.63 LDP reserve the right to comment on the IDP, once it is available.
- 6.64 Similarly, there is no draft Community Infrastructure Levy (“CIL”) presently available, which it is intended will fund the infrastructure in the IPD. Again, LDP reserve the right to comment on the CIL when it is made available.



APPENDIX 1

LANGWITH – A SUSTAINABLE GARDEN VILLAGE

Appendix 1 – Langwith – A Sustainable Garden Village

A New Settlement in South East York – The History

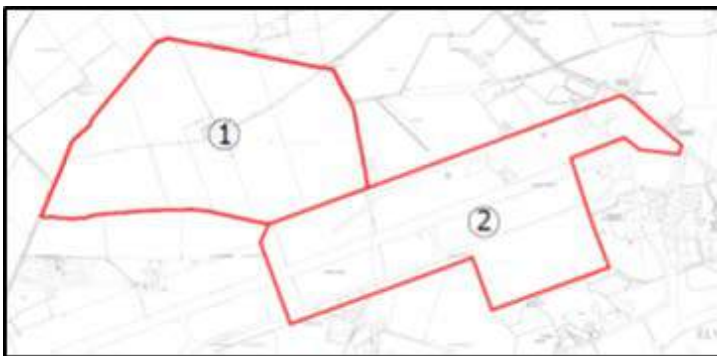
- 1.1 CYC’s planning support for a new settlement in the south east of the City can be traced back to 2013. Throughout the emerging Local Plan process of the past 5 years, there has been a recognition that a new settlement in this area is appropriate and necessary to meet the City’s housing needs, this part of the City has been deemed appropriate for a new settlement, having regard to the following spatial aspects:
 - 1.1.1 The character and setting of the City.
 - 1.1.2 Green infrastructure conservation, green corridors and open space.
 - 1.1.3 Flood risk.
 - 1.1.4 Transport infrastructure
- 1.2 A brief outline of the emerging Plans’ support for a new settlement is demonstrated below.
- 1.3 The draft 2013 Local Plan (Preferred Options) identified a major greenfield site immediately south of the A64 as a Strategic Housing Site to accommodate c5,580 new dwellings and a new Local Centre; see **Figure 1 at Appendix 1a**.
- 1.4 The draft 2014 Local Plan (Further Sites Consultation) continued to promote a similar greenfield site for c5,073 dwellings, as shown in **Figure 2 at Appendix 1a**.
- 1.5 The draft 2014 Local Plan (Publication Draft) promoted a settlement in this broad area could accommodate c6,000 homes. Again this was on a wholly greenfield site, and is shown on **Figure 3 at Appendix 1a**.
- 1.6 The draft 2016 Local Plan (Preferred Sites Consultation) then promoted a settlement in this broad area for circa 3,339 homes. This was in part on brownfield land (as shown in **Figure 4 at Appendix 1a**).
- 1.7 Following consultation of the Plan in Summer 2016, and having regard to representations by Langwith Development Partnership Limited, Officers recommended a larger mixed greenfield/brownfield allocation to their LPWG in July 2017. (See **Figure 5 at Appendix 1a**). This site is referred to as ST15 (Reg 18, 2016).
- 1.8 Despite the Officers recommendation, the LPWG decided to retain the ST15 allocation from the Preferred Sites Consultation Plan 2016. As part of the further Reg 18 Local Plan, consultation in Summer 2017. There was no explanation by the LPWG (and subsequently CYC) why they decided to go against Officers recommendation in this respect.
- 1.9 The draft allocation subsequently consulted on as part of the Local Plan Pre-publication Draft (2017) was identical to that proposed in the Preferred Site Consultation (2016), herein referred to as ST15 (Reg 18, 2017).
- 1.10 Following representations by Langwith Development Partnership Limited to the draft Plan, Officers again recommended changes to the allocation at their LPWG in January 2018 (**Figure 7 at Appendix 1a**). They recommended changes, which were identical to those they recommended to the LPWG in July 2017. The LPWG again went against the Officers recommendations, although again with no explanation, and reverted to that consulted upon in 2016 (i.e. **Figure 4 and 6 at Appendix 1a**). This is hereafter referred to as ST15 (Reg 19, 2018).

- 1.11 Unrelated to the Local Plan process, but in recognising the planning merits of a new settlement in this location, CYC put ST15 forward as an expression of interest for a Garden Village under the CLG's invitation in July 2016.
- 1.12 The need for a new settlement to meet York's housing need has therefore been long established, and without a deliverable new settlement in this location of the City, CYC will be unable to meet their housing needs in a sustainable manner.
- 1.13 It is notable that officers have, on 2 separate occasions, recommended an allocation that is largely the same (with the exception of the south western corner) as Langwith (see below).

The Langwith Site

- 1.14 The Langwith site is characterised as shown in **Figure 8** (shown below); it includes:
- i. The northern part of ST15, extending to an area of 101ha (Parcel 1).
 - ii. Privately developed land containing the former Elvington Airfield parcel extending eastwards by 103ha, but excludes some c55 ha of the Airfield 27ha ST15 (i.e., of land to the west of the Airfield) (Parcel 2).

Figure 8: Land Parcels making up Langwith



- 1.15 Land in third party ownership (the Handley land) is not included within the allocation.
- 1.16 Outside of the Langwith site, it is proposed that the western part of the Airfield (c55ha) will be put over to a natural, managed ecological area. This will involve removing all hard standing and the creation of a biodiversity offsetting area. This is proposed for ecological designation and will be intrinsically linked to the development.
- 1.17 The general environmental characteristics of Langwith are outlined below:
- i. Topography – The Airfield is generally level, with some undulation across the other areas of the Site. Level information from LiDAR indicates that these levels vary from 14m and 8.5mm with the lower levels associated with watercourse routes.

- ii. Ground conditions – Potential sources of ground and geotechnical contamination have been assessed as part of a Phase I Preliminary Risk Assessment¹ (Appendix 10), of which confirms the acceptability of the development of homes (and other uses proposed in the allocation) on the site subject to appropriate mitigation and further detailed site investigations. Potential sources of contamination arise from the airfield operations on the southern section of the site, including historic use of aviation fuel tanks, are capable of being remediated. The northern site component has historically remained as undeveloped agricultural land, ie, without any ground condition constraints.
- iii. Agricultural land quality – The Site is principally made up of Grade 3 agricultural land in its north and non-agricultural land on the Airfield itself. A small part of the north-west of the Site is Grade 2 agricultural land.
- iv. Flood Risk and Hydrology – In consultation with the Environment Agency, CYC and the Ouse and Derwent IDB, a detailed site specific hydraulic modelling has been undertaken by WSP (2016 Representations – see later) to accurately establish the probability of flooding and to better define local flood zones¹ (Appendix 11). This confirms that the Site is not at significant risk of flooding and can be categorised as Flood Zone 1 in majority (with a small part of the north-west, in an area not proposed for built development, in Flood Zone 2 and 3).
- v. Ecology – Langwith comprises largely arable farmland in its north and a mosaic of hard standing and semi-natural grassland habitats at Elvington Airfield (the “Airfield”) host to populations of breeding and wintering birds and habitat mosaics. The Airfield has greater ecological value than the farmland element and entirety of it has recently been designated as a SINC for its variety of habitats.
- vi. Heritage – Langwith is not subject to any site-specific heritage designation, although there are several within the surrounding area including the Grade II Listed Control Tower at Elvington Airfield. Langwith lies in a landscape of known archaeological potential, with activity dating from prehistory to the modern day. A scheme of archaeological evaluation is already in place, which will allow an appropriate programme of archaeological mitigation to be implemented, and to allow for the preservation by record or design of any remains of archaeological significance.

1.18 These demonstrate that there is no technical or environmental matters that would render the site inappropriate for the development of a new garden village, subject to appropriate mitigation mechanisms being put in place.

1.19 The site presently falls within the Green Belt of York, the precise boundaries of which are to be identified in the Local Plan. It is proposed by Sandby and Oakgate that the whole area of Langwith be excluded from the Green Belt (see below for a summary of Green Belt implications); the ecological off-setting area is proposed for designation in the Local Plan, this is proposed to remain in the Green Belt.

Langwith’s Links to the rest of the City

1.20 The site is presently linked at the eastern end of the Airfield to York by Elvington Lane (which joins with the Hull Road). It is intended as part of the allocation to create a new primary access, via the A64, while maintaining a secondary access by Elvington Lane. The access strategy includes:

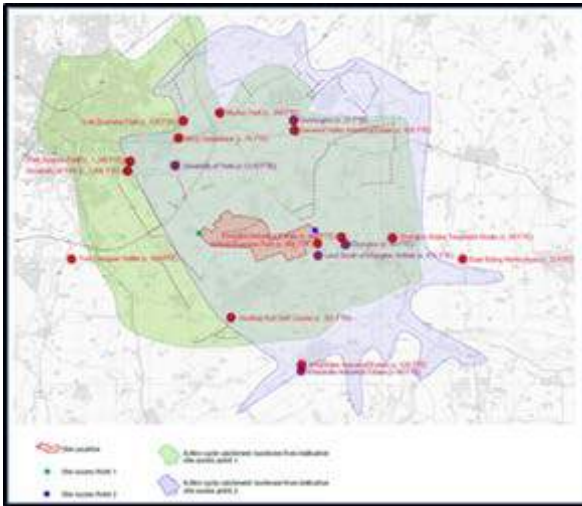
¹ The assessments reviewed a large area, ie, that covered by Langwith (Reg 18, 2016). They covered however the active area now promoted as Langwith (Reg 19, 2018).

- 1.20.1 **A new grade-separated access junction on the A64 junction road.** In combination with the provision of a link road to access the proposed University car parks directly from the A64, this will significantly reduce the likely traffic impacts of the development on Elvington Lane and Grimston Bar interchange. It is proposed to provide the junction and associated roads as soon as possible following the granting of a planning consent and agreement of technical details.
- 1.20.2 Realignment of the northernmost section of Elvington Lane, in effect providing a **highway link between Elvington Lane and a new junction approximately 600m east of Grimston Bar on the A1079 Hull Road.** This link will be provided as part of the initial phase of development.
- 1.20.3 **High quality, safe and convenient walking and cycling routes permeating through the allocation site will be delivered,** connecting to external routes including Langwith Stray, Long Lane and Common Lane, which will be retained as pedestrian and cycle routes only. In turn these routes provide a direct cycle route to Heslington and the existing network of cycle routes to the City Centre and main urban area.
- 1.20.4 **A direct and convenient public transport link to the City Centre via the University of York could be provided** via the proposed A64. The allocation site represents a scale of development that will ultimately generate sufficient public transport demand to commercially sustain a frequent service in the long term.
- 1.21 With the outline strategy and above highway works in place, it is considered that the proposed allocation can be satisfactorily accommodated by the transport network. The works have been costed on an initial basis, and viability assessment work undertaken confirms that early delivery of the above infrastructure is feasible. The land required to provide the identified highway works is within the control of the scheme promoters or within the adopted highway and, as such, they are considered to be deliverable. In addition, the infrastructure identified can be linked in planning terms through appropriate thresholds to appropriate phases of development as they come forward.

Links to the University and the Elvington Business Park

- 1.22 Whilst being separate from York, and being a sustainable community in its own right, the site is well placed to benefit from links to local employment opportunities.
- 1.23 **Figure 9** (shown below) demonstrates the main areas of commerce in the south east of the City. The proximity of the local employment is self-evident. Within an 8km cycle catchment of the proposed new settlement, there is access to a significant quantum of existing and new future (allocations) employment opportunities.

Figure 9: Cycle Catchment and Employment (existing shown in red, proposed allocation shown in purple)



- 1.24 More so, with improved to the cycle and footpath networks in and to the site, the above catchments will extend and make other facilities such as York Designer Outlet accessible for those residents of Langwith.
- 1.25 The Elvington Airfield Business Park is located directly to the south east of the proposed allocation, and this contains in the order of 405 jobs. The Business Park is identified for future expansion (site ref: SS21), with an allocation to provide 25,080 sq m. This will have the potential to create in order of a further 557 jobs.
- 1.26 The University is only c2km to the north of the allocation, and with the new access, and existing Common Lane/Long Lane/Langwith Stray access, it is easily accessible from Langwith. It currently employs 7,700 people on site (including academics, management, administration and maintenance).
- 1.27 The University is identified for expansion in the emerging Local Plan (site ref: ST27) bringing it closer to Langwith, with an allocation of 21.5ha of additional land to accommodate up to 20,000 sq m of B1(B) employment floorspace for knowledge based activities and higher education and related uses. This allocation itself could generate up to 800 new jobs in this area.
- 1.28 More so, the University have made representations to previous versions of the Local Plan seeking a larger extension, on the basis of the University's expansion plans and the appropriateness of this area for a larger allocation. There is therefore the prospect of even more employment opportunities being created in this part of York, close to Langwith.
- 1.29 There are inherent synergies between Langwith and the University, and the development of both sites together can deliver additional opportunities, notably:
- Langwith will deliver a new A64 junction in the early phases of development. This could provide a secondary access to the University and relieve traffic pressure on the Grimston Bar junction. There is the potential for electric vehicles to be introduced along this route, to accord with the University's aspirations for sustainable energy supply, and connect the University to Langwith.
 - Potential for joint sustainability strategies, including power, utilities and water. Both sites could be integrated within a CHP network which would deliver fuel and carbon savings.
 - The ability of the recreational facilities at the University to be accessible to residents at Langwith. Conversely, new housing at Langwith would be at an acceptable cycling distance for University staff and mature students, as well as for the significant existing and future employment at the University itself.

- A combined public transport demand which would sustain commercially viable high frequency bus services in the long term.
- An overall benefit on the performance of the local drainage network through the management of surface water at both sites.

Green Belt

- 1.30 The NPPF specifies five purposes that Green Belt serves, namely: (i) to check the unrestricted sprawl of large built-up areas; (ii) to prevent neighbouring towns merging into one another; (iii) to assist in safeguarding the countryside from encroachment; (iv) to preserve the setting and special character of historic towns; and (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land (Para. 80).
- 1.31 LPAs with Green Belts in their area should establish Green Belt boundaries in their Local Plan. Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan (NPPF para. 83). When reviewing Green Belt boundaries, regard must be had to the permanence of the Green Belt in the long term so that it can endure beyond the plan period, as well as the need to consider sustainable patterns of development.
- 1.32 The Green Belt in York has not been fixed through an adopted Local Plan and the emerging Local Plan will be the first time that it is set in this regard. Currently, CYC are reliant upon the Green Belt boundary set out within the partially revoked Regional Spatial Strategy (RSS) for Yorkshire and the Humber. This Green Belt boundary needs to be modified in order to meet CYC's objectively assessed housing need.
- 1.33 The primary purpose of Green Belt in York is to preserve the historic character and setting of York. It has been long recognised that this part of the York's Green Belt has the capacity to accommodate a settlement of a significant scale (i.e., up to 6,000 homes). Those areas of the City's Green Belt that serve a particular function are identified in the Green Belt Appraisal (GBA) undertaken by CYC in 2003. Langwith Reg 19, 2018 is not identified as playing any specific Green Belt function, albeit the GBA recommends the retention of an open area to the south of the A64 to continue a wedge of countryside outside the ring road.
- 1.34 The 2013 'Preferred Options' Local Plan, the 2014 'Further Sites Consultation' Local Plan and the 2014 'Publication Draft' Local Plan all considered a new settlement in this location to be appropriate (see Section 1 for the various boundaries). A key policy objective was the provision of a significant buffer to the A64 in order that the settlement was read separate from York and sat within its own landscape context.
- 1.35 The boundary put forward in the 2016 and 2017 draft Local Plans, as well as the revised boundary of Langwith Reg 19, 2018, propose a new settlement substantially further away from the A64 and are therefore appropriate in this regard. Langwith Reg 19, 2018, is c1.2km away from the A64, and through careful design and layout will not be perceptible from the A64.
- 1.36 The site is self-contained, and a substantial division between the settlement boundary of York and Langwith is proposed. Indeed, the A64 divorces the site from York, and the ability to assimilate the scheme into the environment creates enduring Green Belt boundaries.
- 1.37 The boundaries of the proposed Langwith allocation are logical, and follow well defined features on the ground (including field boundaries, natural and man-made features and the old Langwith Township boundaries). Similarly, the new settlement is separate from the small villages to its south and south east (ie, Elvington and Wheldrake). The allocation will not result in any coalescence of settlements.

- 1.38 Through careful design and layout, including strategic landscaping, clear and distinct boundaries can be established within the allocation that will prevent future coalescence.
- 1.39 The Heritage Summary (**Appendix 6**) demonstrates that the allocation can be appropriately accommodated within this part of the City without substantial harm to the heritage significance of the City or the principal characteristics that allow the unique and special historic character of the City to be understood and appreciated.
- 1.40 Delivering more homes in this location on a site that is both available and suitable for immediate development will assist the local economy through delivering much needed homes during the plan period and beyond. The proposals will not undermine the urban regeneration of the City. It is accepted that a significant supply of new housing will need to be delivered outside the existing settlement in order to meet York's housing needs, and Langwith. This site is appropriate to meet those needs.
- 1.41 The scale of the allocation, and the delivery trajectory for new homes beyond the plan period (**Appendix 9**), means the boundary set around the proposed allocation of Langwith will endure beyond the plan period by 7 years (up to 2039).
- 1.42 In summary, Langwith Reg 19, 2018, is consistent with the five purposes of the Green Belt, as well as objectives of Green Belt policy in light of the pressing housing need within York and the specific characteristics of this site.

What Will Increasing and Modifying ST15 Achieve?

- 1.43 Along with addressing the viability, and technical inappropriateness of ST15, the allocation proposed for Langwith will increase the area of allocation, in an appropriate manner, whilst providing the opportunity for delivering a larger number of residential units, on a site that involves a greater amount of previously developed land.
- 1.44 The consequence of increasing the scale of the allocation is to increase the potential housing yield of the allocation. The emerging Local Plan suggests that ST15 could accommodate 3,339 dwellings, delivering in the order of 2,200 dwellings during the Plan period (see SS13). This trajectory is unrealistic. Even if the scheme was viable, and the trajectory is unlikely to deliver more than 1,950 houses during the Plan period, and possibly much less (paragraph 3.62 of the draft Plan suggests delivery will not start until 2022/23).
- 1.45 It is estimated that Langwith could yield in the order of c4,000 homes, of which c2,400 could be delivered during the Plan period. The remainder would come forward by 2039. Commentary on the delivery trajectory is set out in the main representations.
- 1.46 In addition, the allocation could deliver the facilities set out in **Table 1.1**.

Table 1.1: Langwith Services

Facilities	Quantum (ha and sq m of development)	Comments
2 primary schools (up to 5 FE)	Total site area of 4.4ha (2 x sites)	2 sites identified on the masterplan for 2 separate schools.
Commercial (retail & other supporting uses)	To indicatively include convenience foodstores (c500 – 1,000sqm each) & c1,000 sq m other shops, restaurants, pubs, cafes	To be located within each of the neighbourhoods to create a mixed-use centre in each.
Commercial (employment)	c2,000 sq m	
Social infrastructure (health, social, leisure, cultural and community)	c1,400 sq m	1 health centre of c900sqm to serve Langwith, and two community centres of c250sqm each.

Creating a sustainable Settlement at Langwith through Development Management

1.47 The emerging Plan sets a number of development management criteria (“Planning Principles”) which are aimed at shaping and delivering a sustainable form of development. These Planning Principles are briefly dealt with below, and considered further in **Appendix 4**, which demonstrate how the scheme can satisfy these principles:

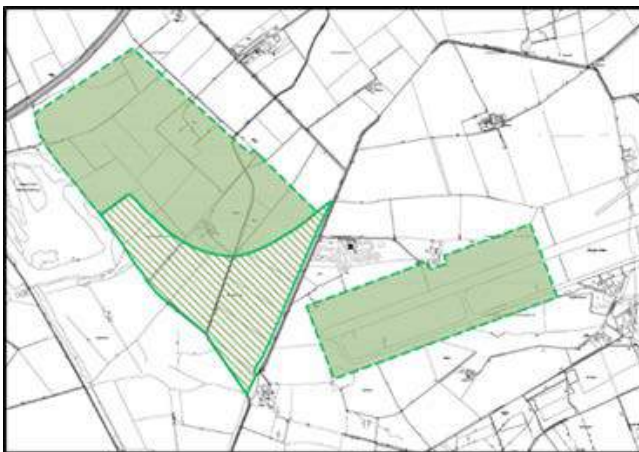
1. Creating a new “garden village” – **Appendix 4** demonstrates the garden village principles that will be adopted at Langwith, and how the form of development can reflect the existing urban form of York (i.e. the main York urban area is a compact City, surrounded by villages), and the linear characteristics of North Yorkshire towns and villages.
2. Sustainable Housing Mix – given the scale of the proposed extended allocation of ST15 Reg 19, 2018, the new settlement can deliver a greater and broader mix of housing, assisting CYC in meeting the housing need in this SHMA (i.e. c4,000 homes, ie, c20% more than proposed in ST15 Reg 19, 2018).
3. Affordable housing – the scheme can help meet those households which require support in meeting their housing needs. Given the scale of the allocation, the scheme can deliver a substantial amount of affordable housing in a broad mix of housing types (to meet the prevailing housing needs over the lifetime of the settlements development). Adopting CYC’s affordable housing target in draft Policy H10 of between 20% - 30%, Langwith could deliver [up to 1,200] homes (compared to only 1,002 by ST15, if it was viable). The scale of development also allows for more innovative types of housing to be incorporated such as self-build, custom build and small scale builders.
4. High design standard – the masterplan demonstrates how the settlement form can be developed to create a new garden village including the adoption of the sustainability objectives of walkable neighbourhoods. More so, the scale of Langwith Reg 19, 2018, enables a greater emphasis on design quality, given its viability. It is also demonstrated the garden village can reflect existing settlement forms.

5. Creating new open space – the masterplan concept demonstrates how the site can deliver strategic greenspace (40% of the allocation will be used for landscaping, SUDS, open recreation, public space), including maintaining views of the Minster, and existing woodland, and respecting the historic runway.
6. No net loss in biodiversity – the ecological strategy, as outlined in **Appendix 7**, demonstrates how no net loss in biodiversity can be achieved on the site, through compensatory provision and mitigation. It is in fact demonstrated that biodiversity net gain can be achieved at Langwith.
7. Avoiding or mitigating impacts on the Heslington Tillmire SSSI, and Lower Derwent Valley SPA/Ramsar– the ecological strategy demonstrates that creating a new HEA adjacent to the SSSI will mitigate any impacts. A site-wide recreation and access strategy can minimise direct disturbance from development and complement the HEA.
8. Protecting Minster Way –**Appendix 4** demonstrates how the enjoyment of the setting of this area can be established.
9. Meeting the needs of future residents – as outlined above, an appropriate range of shops, services and facilities including social infrastructure (health, social, leisure, cultural and community uses) can be provided, and these can be focused around a new principle local centre serving the village, but with separate satellite commercial areas.
10. On-site education provision – the Planning Principles require nursery and primary education to be provided on site, whilst recognising that secondary education is more footloose. The concept masterplan underpinned by the viability assessment (by Bidwells) demonstrates the provision of two primary schools, with nursery provision, will be accommodated within the local centre. It is proposed that secondary education, will be provided elsewhere within York, and mitigation for the development will be made through contributions.
11. Transport infrastructure – **Appendix 3** demonstrates that appropriate access can be gained via the A64, with a secondary access from Elvington Lane.
12. Common Lane/Long Lane/Langwith Stray – this will be retained for cycle and pedestrian routes only, thereby protecting the character of Heslington Village.
13. Dedicated secure access for existing local residents – the transport strategy (**Appendix 3**) demonstrates how this can be provided. The details can be agreed with the community of Heslington.
14. High quality, frequent and accessible public transport services – **Appendix 3** outlines the public transport strategy, and how the site can be appropriately accessed, enabling trips to be undertaken from those residents in the new settlement by public transport with c94% of all properties within 400m/5 minutes’ walk of a bus route. A public transport hub can be created at the local centre, with appropriate local interchange operating facilities.
15. Optimise pedestrian and cycle integration – permeability, connectivity and accessibility through the site, and beyond linking it to the City and surrounding areas to create a well-connected walkable neighbourhood, maximising the opportunity for residents to take up “active” forms of transport.
16. Synergy with the University expansion – infrastructure in terms of transport, energy and waste strategies can be developed that exploit synergies with the University.

Langwith's Biodiversity Strategy

- 1.48 The ecological work (**Appendix 7**) demonstrates that the biodiversity implications of the Langwith Reg 19, 2018 will require mitigation, but which can bring significant benefits. The aim of Langwith is to deliver 'no net loss' of biodiversity as a minimum, in compliance with CYC's policy objectives for biodiversity. This has been demonstrated through the application of the Government's industry standard quantitative metric for biodiversity impact accounting.
- 1.49 It is proposed as part of Langwith that in order to achieve "no net loss" of biodiversity, a Habitat Enhancement Area (HEA) will be provided, and supplemented by areas of managed ecological compensation notably an area to the north of the proposed HEA and the western half of the airfield (**Figure 10** shown below). These areas are proposed to be designated (under Policy GI6).

Figure 10: Habitat Creation and Enhancement Areas



- 1.50 Langwith's biodiversity mitigation creates a significant city-wide ecological asset and legacy for future generations.
- 1.51 The managed restoration of the western part of the Airfield will return c55ha of previously developed land (i.e. brownfield) to greenfield land.
- 1.52 The habitat creation and enhancements will provide 192ha of high quality biodiversity without public access, contributing significantly to regional habitat restoration targets including for wet grassland mosaics and neutral unimproved grassland providing important habitat for key farmland bird species such as Skylark, and populations of wading birds and wildfowl during breeding, migration and wintering periods. This will be provided in perpetuity.
- 1.53 Furthermore, impacts on the Heslington Tillmire SSSI can be avoided and a net gain in biodiversity can be gained through a new HEA and additional offsetting.
- 1.54 There are significant biodiversity benefits of the proposed Langwith scheme over that proposed in ST15 Reg 19, 2018. These are:
1. Reduced fragmentation of the airfield, protecting and compensating for bird populations using the airfield, including buffer habitat, security fencing, the creation of an undisturbed area of neutral grassland managed for the long-term value of grassland habitat and bird populations.

2. The juxtaposition of the large sustainably managed area of the western airfield under the Langwith scheme adds significant value because of its proximity to the HEA and Area H1, both to the west of the airfield, and to the Heslington Tillmire SSSI adjacent to the HEA. No such value can be attributed to the layout of ST15 Reg 19, 2018.
3. ST15 Reg 19, 2018 would potentially give rise to a total loss of the existing biodiversity value of the airfield for example by removing the attraction of its significant area to bird populations such as Lapwing, Golden Plover and Skylark. This fragmentation would result in two small areas separated by built development. Disturbance into both remaining parts of the airfield would also render these areas of very limited use. Hence, in order to be compliant with paragraph 3.64 of SS13 and the criteria pertaining, such impacts would need biodiversity offsetting to compensate for the loss of the airfield almost in its entirety, which therefore affects the viability of the development as there is not one block of land proximate enough to enable this to be delivered at sufficient scale. Hence, ST15 Reg 19, 2018 would be in breach of CYC's no net loss policy.

1.55 More so, the Langwith Reg 19, 2018 scheme delivers on all of the criteria in Policy SS13.

1.56 Hence, the proposed Langwith scheme positively addresses:

1. The potential for impacts on the Heslington Tillmire SSSI to the satisfaction of Natural England and includes a scheme for protection of the SSSI, including an access management regime.
2. The potential for indirect impacts on the Lower Derwent Valley SPA/Ramsar/ SSSI.
3. The protection and enhancement of half of the Elvington airfield candidate SINC for the benefit of biodiversity as part of the Langwith scheme.

1.57 It applies an appropriate mitigation hierarchy in respect of minimizing impacts of the development through mitigation. This is achieved through the inclusion of 192ha of land that will be managed under a long-term agreement for the benefit of a range of wildlife species and habitats, in order to compensate for residual impacts. This will provide a major biodiversity asset for the future of York.

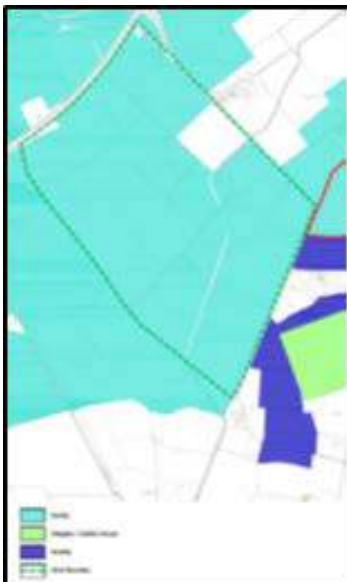
1.58 By contrast, ST15 Reg 19, 2018 has not been approached in accordance with the mitigation hierarchy, nor quantitative analysis of residual impacts and, how to compensate for the scheme. Nor has a scientifically evidence based approach been proposed in order to calculate, identify and deliver the areas of land that would be needed. Furthermore, allocation OS10 of the draft plan (**Figure 11** shown below) has not been adequately assessed, and is unjustified.

Figure 11: Draft Open Space (OS10) Allocation



- 1.59 It is also noteworthy that part of OS10 is in third party ownerships, outside the control of the Council, Sandby or Oakgate, (see the “white land” in **Figure 12** shown below) and will be directed by the new SSA required to link ST15 with the A64.

Figure 12: Land Ownership in OS10



Drainage/Flood Risk

- 1.60 An initial flood risk and surface water management characteristics analysis for associated for development of Langwith Reg 18, 2016 was carried out in 2016 (**Appendix 11**).
- 1.61 This appraisal detailed the work completed to provide updated flood risk mapping, to more accurately establish the probability of flooding and extent of flood zones, through detailed site specific hydraulic modelling in consultation with the Environment Agency, CYC and the Ouse and Derwent IDB.
- 1.62 This updated hydraulic modelling confirmed that the majority of Langwith is defined as within Flood Zone 1, with only a small part in the north west, in an area not proposed for built development, in Flood Zone 2 and 3. The Environment Agency confirmed that they would have no objections to development from a flood risk perspective, given that the commentary on the built development in the emerging masterplans indicated no such built development areas would be in any high risk flood zones, i.e. Flood Zone 2 or 3.

- 1.63 It also demonstrated it was both practical and viable to deliver a surface water management system to control run-off and restrict discharge rates, and a sustainable Urban Drainage Systems (SUDS) could also be incorporated.
- 1.64 The benefits of the surface water management system are not restricted to Langwith Reg 19, 2018 itself, but can afford substantial benefits and enhancements to the surrounding area including:
- Run-off from Langwith will be significantly reduced in time of heavy and prolonged rainfall, reducing load in the drainage system and reducing downstream flood risk;
 - The HEA and ecological mitigation areas could allow for period controlled flooding, easing peak flows through the Tillmire SSSI and further reducing downstream flood risk; and
 - There is an opportunity, working with the Ouse and Derwent IDB, to improve the discharges to and performance of, parts of their network aligned with the IDB's aims.

Ground Conditions

- 1.65 The Phase 1 Preliminary Risk Assessment carried out in 2016 (**Appendix 10**) outlined the potential environmental and geotechnical constraints at Langwith. This confirms that the site is appropriate for residential development subject to remedial measures, the extent of which will need to be assessed through further intrusive investigations.

Heritage

- 1.66 There has been a considerable level of heritage assessment which has been ongoing since 2013, considering the potential impact of a settlement in this part of York. The various work undertaken by the promoters' advisors (FAS) is outlined in Section 2 of **Appendix 6**. The purpose of the assessments were to address the requirements of relevant legal frameworks and planning policy pertinent to the site, its proposed development, and its implications specifically on heritage matters.
- 1.67 York (as noted in CYC's Heritage Topic Paper, June 2013) has six principal 'special characteristics' of the historic City of York. Through appropriate design, any potential impacts on these principles the various work by FAS demonstrates these can be appropriately mitigated against, in particular:
- Langwith would be a distinct entity that is sufficiently offset from the A64 to retain impression of rurality to the south of this ring road;
 - Development of Langwith would accord with the historic compactness of a City which comprises a dense central core with outlying settlements;
 - Views along the western boundary of Langwith would be preserved across the HEA;
 - The masterplan demonstrates how the historic runway could be preserved in its eastern part, allowing long views to be retained, along with the legibility of the monument preserved; and
 - Any archaeological remains can be preserved in situ or by record.
- 1.68 Indeed, each of the previous stages of the emerging Local Plan have confirmed that a new settlement in this location would be appropriate. This work considered that this would reinforce the settlement pattern of smaller settlements around York's main urban area, preserve the impression of York being set in a rural hinterland, and through appropriate design and conservation protect the integrity of the City's overall setting and landscape.

- 1.69 The FAS work has demonstrated that Langwith Reg 19, 2018 would not unacceptably harm the special characteristics of York and is appropriate in this regard. When balancing any residual harm, including the unavoidable loss of green space, against the public benefit of the proposed development and the need for Green Belt release to meet CYC's OAN, it is concluded that Langwith is entirely appropriate in heritage terms.
- 1.70 HE have previously raised specific issues with the north western sector of Langwith (Reg 18, 2016 and Reg 18, 2017) on the grounds that development in this area had the potential to impact on the setting of York. Further evidence was submitted by FAS Heritage in the 2017 Representations to demonstrate this would not be the case. Without prejudice to this view, Langwith no longer involves this area of land.
- 1.71 Designated heritage assets within a defined study area around Langwith have also been assessed. This study area includes one Scheduled Monument, 20 Listed Buildings and two Conservation Areas. Of these, only the Grade II listed Control Tower at Elvington Airfield could potentially be affected by development of Langwith, albeit appropriate design could mitigate against any adverse impacts, and the ability to appreciate the historic and architectural significance enhanced.
- 1.72 HE have also previously raised queries in respect of the heritage implications of creating a new access onto the A64. The implications, of the A64 junction, which is a requirement of any new settlement in this part of the City, be that ST15 or Langwith, was addressed in work undertaken in 2017 by FAS and others. This demonstrated that the new junction would not cause unacceptable heritage impact. Further work has been undertaken on this matter, through a landscape and visual assessment ("LVIA"), which is contained at **Appendix 5** (see below).
- 1.73 Langwith has potential for archaeological remains, albeit the full extent and significance is unknown. An Archaeological Strategy has previously been developed in liaison with CYC's Archaeologist (John Oxley) to allow impact on known and potential archaeological deposits to be assessed, and appropriate mitigation designed. Initial geophysical surveys and trial trenching have been undertaken and future work will inform an appropriate mitigation strategy for development, as required.

Agricultural Land

- 1.74 Langwith is principally made up of Grade 3 agricultural land in its north and non-agricultural land at the Airfield. A small part of the north-west of the Site is Grade 2 agricultural land. This does not, therefore, represent the highest quality agricultural land that should be safeguarded.

Landscape and Visual Implications

- 1.75 The promoters have commissioned work that considers the landscape and visual implications of a new settlement, and this is contained in **Appendix 12** (submitted to CYC and HE in Summer 2017). This considered the visual implications of a new garden village on the setting and characteristics of York (the garden village considered was Langwith Reg 18, 2016). It demonstrated that the settlement would cause no harm to the settlement of characteristics of York. **Appendix 12** also considered the implications of the junction onto the A64, and this has been supplemented with more recent work (**Appendix 5**). This also demonstrates that the proposed new access onto the A64 and the strategic access link into Langwith Reg19, 2018 would not cause any harm.

Infrastructure Requirements of Langwith

- 1.76 Set out below is an appraisal of the infrastructure requirements of Langwith. It demonstrates the infrastructure available in the area, and that which is required to ensure that Langwith can be accommodated satisfactorily and sustainably.

Highways

- 1.77 A phased strategy of highways works is proposed that would introduce a new grade-separated junction with the A64 as part of the first phase of development. The provision of this has been agreed in principle with Highways England, and future detailed modelling work will determine its likely scale and precise location.
- 1.78 This new junction would function as the primary access route to Langwith, extending south from the A64 into the development. A new link road to access the proposed University car parks to the north of the A64 will also be introduced from this junction, removing this traffic that would otherwise enter the University via Grimston Bar.
- 1.79 A new road would be constructed that runs through Langwith and connects the new A64 junction to the north with Elvington Lane to the east.
- 1.80 To the north-east of Langwith, Elvington Lane would be realigned and upgraded to connect with York Road further away from the A64 Grimston Bar junction. This will relieve congestion at the Grimston Bar roundabout and ensure that Elvington Lane can appropriately serve Langwith as a secondary access route. It also offers a potential public transport route if appropriate.
- 1.81 Collectively, these works will significantly reduce the likely traffic impacts of the site on Elvington Lane and the Grimston Bar interchange and ensure that Langwith can be appropriately served by the highway network.
- 1.82 Land required for these works is within the control of the developers and there are no constraints to delivery.
- 1.83 Further works to the A64 Grimston Bar junction will take place at a later phase of the development, and would include widening of slip roads and capacity enhancements.

Utilities and Energy

- 1.84 The site has access to a wide range of existing utility services (**Appendix 12**). The presence of such services can enable the connection of the site into the existing utility infrastructure network in a relatively straightforward manner.
- 1.85 The surrounding utility infrastructure should allow initial early phases of development to be connected and served, the extent of which will be agreed with the individual utility providers.
- 1.86 These works can come forward in parallel with the development of Langwith. It is both practical and viable to provide the necessary utilities to serve c4,000 homes as well as the additional land uses proposed within the masterplan.

Education

- 1.87 The housing delivery trajectory demonstrate that primary schools (2x) should be provided on site, peaking at a maximum combined 4 FE.
- 1.88 Secondary schooling is not required on site, and will therefore be provided through contributions, enabling improvements and enhancement to existing secondary education infrastructure in the City.

Community

- 1.89 A range of new community infrastructure will be delivered as part of Langwith's development, with the new settlement developed having regard to garden Village principles.
- 1.90 A range of uses, including convenience retail, other shops, health centre, restaurants/cafes and a community centre, will be provided. This will reduce the need to travel and create a sustainable neighbourhood that can function in its own right.
- 1.91 A key component of the masterplan for Langwith is the incorporation of significant (40%) open space provision across the allocation. The on-site open space is shown indicatively in **Appendix 4** and will comprise a wide variety of typologies, including sports pitches, equipped and informal play space, allotments and amenity open space and SuDS.
- 1.92 Significant public transport and cycle improvements are incorporated as part of the allocation to the benefit of residents. The masterplan makes allowance for a bus route to penetrate the development. Given that the boundary has been identified to maximise the ability to create walkable communities, the vast majority of residents will be within 400m walking distance of a bus stop and therefore the likely uptake of public transport is expected to be high.
- 1.93 The existing Common Lane/Long Lane route will be retained as a tertiary access for pedestrians and cyclists to provide access to Heslington and the University.
- 1.94 As confirmed below, the scale of the settlement being proposed (c4,000 homes) is sufficient to support the above provisions of community infrastructure due to a sufficient critical mass.

Employment

- 1.95 Local employment is a key component of a sustainable community to ensure a genuine mixed-use community and that unsustainable trips are kept to a minimum. The Eco-town annex to PPS1 set out that as a minimum there should be access to one employment opportunity per new dwelling that is easily reached by walking, cycling and/or public transport. This equates to c4,000 jobs in the case of Langwith.
- 1.96 Langwith will deliver a mix of employment onsite through the supporting range of uses that it incorporates in each of the neighbourhoods. These would be easily reached by on-site residents. In addition, there are a number of employment opportunities that fall within the generally accepted cycling distances (8km), and with improved cycle/pedestrian routes more facilities are likely to be accessible to residents of Langwith.
- 1.97 **Table 1.2** below sets out the estimated employment generation on-site by Langwith, adopting the HCA Employment Density Guidance:

Table 1.2: On Site Job Creation

Proposed Use	Indicative Floorspace	Employment Density (HCA Guidance)	Indicative No. of Jobs
Convenience Foodstores	1,500 sq m	1 FTE per 15 sq m (NIA)	100
Restaurants/Pubs/Cafes	1,000 sq m	1 FTE per 15 sq m (NIA)	67
Health Centre	900 sq m	1 FTE per 50 sq m (GIA)	18
Offices	2,000 sq m	1 FTE per 12 sq m (NIA)	166
Community Centre x 2	500 sq m	1 FTE per 50 sq m (GIA)	10
Primary Schools x 2	2 x 2 FE Approx. 3,000 sq m each	1 FTE per 36sqm (GIA)	167
Total			528 FTE

1.98 Outside of Langwith, it is estimated that there are a minimum of c8,350 jobs within a realistic (8km) cycling catchment (**Figure 9**). This calculation excludes York City Centre which will be easily accessible by public transport, and in reality therefore access to jobs is much higher.

1.99 Across the plan period the draft Local Plan also identifies several allocations that will generate additional employment growth (c1,600 FTE positions). This includes, inter alia, expansions to the University of York and Elvington Industrial Estate. Langwith is well positioned and accessible to both of these locations.

1.100 Langwith would therefore have access to considerably more employment opportunities than the requirement generated by 4,000 homes.

Deliverability of Langwith

1.101 These representations demonstrate that the site is “deliverable”, i.e., it is available now, offers a suitable location for development now and, there is a realistic prospect that substantial housing will be delivered during the plan period (and beyond).

1.102 The control on developing the land making up Langwith is within two entities, both of whom support the development of the land shown in **Figure 8**. The entire land making up Langwith is therefore within the control of “willing developers”, making the allocation deliverable (see the test at paragraph 1.73 of the NPPF).

1.103 Assessments by Bidwells (**Appendix 2**) have demonstrated that the scheme is viable. When taking account of the costs of any of the requirements to be applied to the development as well as the normal cost of development and mitigation, a competitive return on the land can be achieved.

1.104 It is demonstrated that the scale of development, will have a delivery trajectory up to 2039 (**Appendix 9**). During the plan period of the Local Plan, it is anticipated that the site could deliver in the order of 2,400 homes, adopting the following delivery scenario:

- Outline planning permission is secured in 2019 following the adoption of the Local Plan. This would include detailed approval of access matters to enable the A64 junction and improvements to Elvington Lane to come forward at the beginning of the development.

- The first residential homes would be delivered on site in 2021.
- Assuming, conservatively, that the number of sales outlets remains unchanged during the construction period, the allocation would be completed in 2039.

1.105 One of the benefits of a larger allocation is an increased diversity in housing provision. In addition to the sales outlets discussed above, opportunities could also arise for more innovative types of housing delivery, including self-build, private rented sector (PRS), custom build and small scale builders. This would both increase the choice of homes, and could also increase the delivery rates beyond the above conservative rates, delivering the whole allocation earlier in the development cycle.

Langwith – A Sustainable Garden Village – A Summary

1.106 The Masterplanning and Place-Making Vision (**Appendix 4**) demonstrates how the site can be sustainably developed, and the benefits of a larger allocation.

1.107 Several policy documents and good practice guidance indicate the sustainability benefits that can arise from a larger settlement.

1.108 The Eco-Towns Supplement to (the now revoked) Planning Policy Statement 1 (PPS1), the Communities and Government Eco-Towns Prospectus and the Town and Country Planning Association (TCPA) Best Practice in Urban Extensions and New Settlements each identify the importance of a critical mass of dwellings as being necessary to deliver a self-contained development. As a consequence, larger settlements can achieve much higher standards of sustainability than smaller developments.

1.109 It is noted within these documents that development needs to be of a scale which allows a settlement to exploit a number of opportunities and benefits to a significantly greater degree, notably:

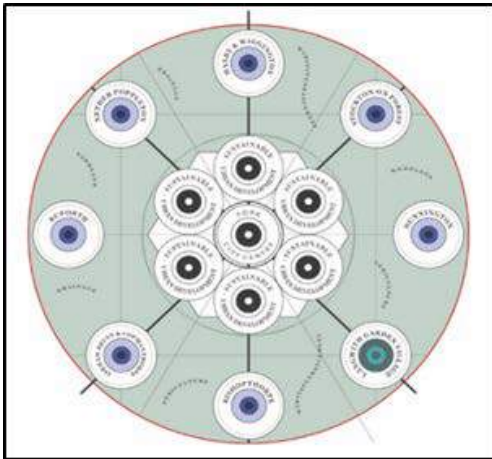
- Enabling opportunities for infrastructure;
- Delivering a locally appropriate mix of housing type and tenure;
- A greater quantity and quality of green space;
- Provide populations of a scale to underpin social and commercial infrastructure.
- Take advantages of significant economies of scale and increases in land value to deliver new technology and infrastructure, for example transport, energy and community facilities.

1.110 The new garden village is considered by the promoter's agents (Bidwells) to be viable to deliver the scale and nature of development shown in the masterplan.

1.111 Langwith provides a strategic opportunity to deliver a Garden Village that will complement and reinforce the existing settlement pattern around York. This pattern comprises a series of villages located around the main urban area.

1.112 **Figure 13** (shown below) below demonstrates how Langwith would fit appropriately within the existing settlement structure of York.

Figure 13: York Settlement Structure Including Langwith



1.113 Langwith is well positioned to York City Centre whilst maintaining a clear and distinctive green separation from the A64 and historic core.

1.114 The vision for Langwith is to create a sustainable garden village of the highest quality, providing for a balanced and mixed community that is well connected by sustainable transport modes. Langwith will reflect the distinctive character of local villages in Yorkshire with a linear through road connecting the two neighbourhoods.

1.115 A connected, multi-functional network of green spaces and corridors will be incorporated that permeates the residential areas and forms part of the movement network for pedestrians and cyclists. This network will include public open space, play areas, amenity space, playing pitches, SUDS, wildlife corridors, allotments and orchards, and green movement corridors.

Benefits of an extended ST15

1.116 The additional benefits arising from the development of Langwith at 4,000 homes compared to a smaller settlement are discussed in **Appendix 4** and in summary comprise:

1. The creation of a vibrant, mixed-use local centre which will improve the quality of the settlement and the overall 'sense of community'.
2. Linked to this is an increased diversity in housing provision through its type, size and tenure. A larger settlement would provide for a greater richness in housing typologies in accordance with CYC's SHMA. This will include affordable housing and more innovative types of housing delivery, including self-build, custom build and small scale builders.
3. An increased housing delivery within the plan period, increasing from 1,950 homes suggested (but unviable in Quod's opinion) in the current allocation to c2,400 in a larger settlement.
4. A significant increase in the amount of public open space on-site, increasing from c67ha to over 80ha.
5. More affordable homes, i.e. the ability to deliver 1,230 affordable homes, on a policy compliant provision of 30%.
6. Provision of a viable and sustainable bus connection between Langwith and the University of York. Two walkable neighbourhoods will be provided where a greater proportion of houses (94%) are within a 400m walk of a bus stop.
7. It is estimated that 4,000 homes would provide for a bus service every 20 minutes. It is estimated that there will be an increase in public transport patronage of c15%.

8. The provision of two primary schools within Langwith totalling up to 5 FE, which provides capacity to meet the long term (2,055) projected child yield, which peaks at 983 pupils, and falls to 655 pupils in 2055. On the other hand, ST15 peaks at 3.71 FE, which would need to accommodate 2 primary schools. However, by 2050 the pupils fall to 350 pupils, which would require one school to close, or both to reduce to 1 FE.
9. At 4,000 houses, a high quality development can be achieved that can exceed normal design standards.
10. An increase in full-time equivalent GPs from 5.3 at 3,339 homes to 8 at 4,000 homes. This will result in a larger and more effective GP surgery provided on-site.
11. The delivery of more sustainable energy measures becomes more cost effective once a critical mass of dwellings is achieved.
12. A significant amount of retail and leisure expenditure generated by the residential population from £64m to £86m (see Table 1.3). This additional expenditure can support more complementary uses within the two neighbourhoods to reinforce their identity and function of the settlement in its own right. Importantly, an additional quantum and wider range of amenities and services will decrease the need to travel elsewhere, and encourage sustainable patterns of travel in the process.

1.117 Further to the final point above, the additional population arising from an extended scale of development will, in turn, generate a greater level of expenditure spending within the local area, to the benefit of local businesses and the local economy.

1.118 Using published data by Experian for the York region, **Table 1.3** below provides a comparison of the convenience, comparison and leisure goods spending that will arise from the current ST15 allocation and Langwith.

Table 1.3: Expenditure Generated by ST15 and Langwith

	ST15 Reg 19, 2018 (3,339 Homes)	Langwith Reg 19, 2018 (4,000 Homes)
Total Expenditure Generated (£m)		
Convenience	£16.2m	£19.4m
Comparison	£24.0m	£28.8m
Leisure	£24.2m	£29 m
Total	£64.4m	£77.2 m

Source: Experian data (generated 26/3/18)

1.119 The above levels of expenditure correlate to the quantum of supporting uses that are proposed by the masterplan. For example, £19.4 m of convenience goods expenditure could support in the order of 1,940 of convenience sales floorspace² (not accounting for any additional inflows of expenditure from outside of Langwith).

² Assumes 80% of convenience expenditure generated by Langwith is retained by the settlement; applies an average £10,000 per sq m sales density to convenience floorspace; applies an 80% gross to net sales floorspace ratio.

1.120 In addition to the expenditure generated by the residential population at Langwith, the land uses and scale of development shown in the masterplan could generate in the order of 528 new jobs which would generate additional expenditure spending in the settlement. The University is also only c2km to the north of the site, whilst Elvington Business Park adjoins the south-east, both of which would raise additional expenditure spending flowing into the settlement.

Summary on Sustainability

1.121 At 4,000 homes, Langwith provides an opportunity to deliver a highly sustainable settlement. At this size of settlement, a critical mass is achieved that allows a significant number of additional benefits, beyond those which would be achieved by a smaller settlement.

1.122 Importantly, Langwith provides an exciting and strategic opportunity to deliver a new sustainable garden village that will complement and reinforce the existing settlement pattern around York, and a series of villages located around the main urban area.

1.123 Unlike ST15, which is not viable (or appropriate), being a deliverable proposition, Langwith will assist CYC in meeting their housing needs, both during and beyond the Local Plan period.

Appendix 1a

Figure 1: Whinthorpe Allocation (2013 Preferred Options)



Figure 2: Whinthorpe Allocation (2014 Further Sites Consultation)



Figure 3: Whinthorpe Allocation (2014 Publication Draft)



Figure 4: ST15 Allocation (Preferred Sites Consultation 2016)



Figure 5: ST15 Allocation (Recommended LPWG 2017)

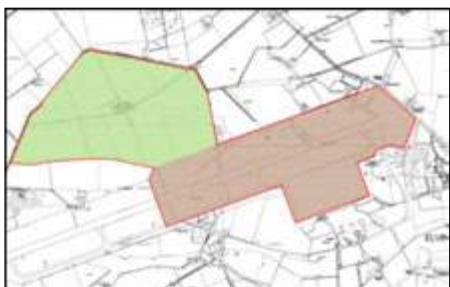
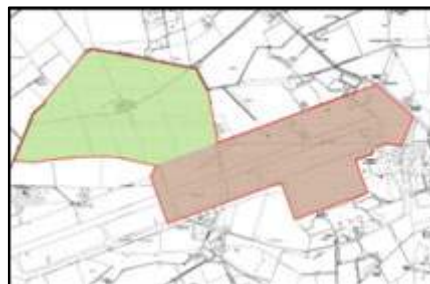


Figure 6: ST15 Allocation (City of York Local Plan Pre-publication, September 2017)



Figure 7: LPWG (January 2018)





APPENDIX 2

REPORT ON DELIVERABILITY AND VIABILITY

4 April 2018



**LANGWITH
REGULATION 19
REPRESENTATIONS
DELIVERY & VIABILITY**

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1.0 Introduction

- 1.1.1 This report is produced by Bidwells for Sandby (York) Ltd and Caddick Developments (“Sandby & Oakgate”) in support of representations being made in response to a Regulation 19 consultation on the draft new Local Plan for the City of York.
- 1.1.2 This report comments on the viability and deliverability of the ST15 (Reg 19, 2018) Draft allocation, and compares this with Sandby & Oakgate’s alternative proposal for a new garden village to be known as Langwith (Reg 19, 2018).
- 1.1.3 In order for a Local Plan to be considered “sound” it must comply with the four “pillars” of paragraph 182 of the NPPF (2012). These are that the Plan should be **positively prepared, justified, effective** and **consistent with national policy**.
- 1.1.4 In the event that the Plan does not deliver to meet the objectively assessed need, provide the infrastructure required or be deliverable, then it cannot be found sound.
- 1.1.5 This report focuses on the deliverability of the site and therefore the ability of the proposed allocation ST15 (Reg 19, 2018) to meet the tests set out within paragraph 182.
- 1.1.6 This report reviews three key issues as follows:
- Key Issue 1: The challenges to delivering the ST15 (Reg 19, 2018) draft allocation
 - Key Issue 2: Changes which could allow the delivery challenges of ST15 (Reg 19, 2018) to be overcome
 - Key Issue 3: The deliverability of Langwith (Reg 19, 2018)
- 1.1.7 The Key Issues are discussed in greater depth below.

2.0 Key Issue 1: The challenges to delivering the ST15 (Reg 19, 2018) draft allocation

- 2.1.1 Bidwells review of the viability and deliverability of ST15 (Reg 19, 2018) has identified three key challenges which would need to be overcome in order for draft allocation ST15 (Reg 19, 2018) to be delivered. These are as follows:
- The significant level of abnormal costs which are required to be incurred to make the site ready for development, and the lack of sufficient productive development to defray these costs in scheme delivery
 - The ability of ST15 (Reg 19, 2018) to be developed sufficiently quickly to deliver the draft Local Plan target yield of 2,200 homes within the plan period
 - The challenge of being able to conclude sensible commercial arrangements with third party landowners to allow ST15 (Reg 19, 2018) to be delivered.
- 2.1.2 These challenges are discussed below.

2.2 The significant level of abnormal costs required to make the site ready for development

Highways Upgrade

- 2.2.1 ST15 (Reg 19, 2018) is a proposed new settlement in open countryside to the south of York. Highways access to the site of ST15 (Reg 19, 2018) is current provided by a single track lane (Long Lane) which would be entirely inappropriate to serve a new development.
- 2.2.2 ST15 (Reg 19, 2018) will therefore require significant improvements to highways off-site to provide sufficient and appropriate access. This is acknowledged by the Council, who have indicated a new development access from the north, including a new junction on the A64. The costs of this new junction are significant and are estimated by Sandby & Oakgate's highway consultant Lawrence Walker Limited at £12 million. As a single point of access, this junction and access road would need to be delivered prior to the occupation of any property, creating an unsustainable cash-flow burden in the early years of the development trajectory.
- 2.2.3 Additional highways works are likely to be required to upgrade the Grimston Bar interchange to deal with the additional traffic generated by ST15 (Reg 19, 2018). The cost of these works is estimated at £6.5m. These works are likely to be required at a similarly early stage, placing more pressure on the cash flow.
- 2.2.4 Finally, given that the sole access from ST15 (Reg 19, 2018) would be onto the A64, in the opinion of Sandby & Oakgate's highway consultant Lawrence Walker Limited it may be necessary to carry out widening works to the A64 between the new junction and the Grimston Bar interchange. This cost, if required to be incurred, could be circa £10 million.
- 2.2.5 ST15 (Reg 19, 2018) would therefore require significant and costly off-site highways works in order to open up the site for development. The burden of the private sector incurring these costs before scheme revenue would create an unworkable and therefore undeliverable development.

Utilities Upgrades

- 2.2.6 As with many large new settlements, ST15 (Reg 19, 2018) will require significant upgrades to local utilities networks to enable services to reach the site. Sandby & Oakgate's consulting engineers WSP estimate a total cost for these works of circa £20 million.
- 2.2.7 As with the highways works above, these works would need to be necessarily incurred before the first plot is sold, damaging project cashflow.

Ecological Mitigation

- 2.2.8 Finally, ST15 (Reg 19, 2018) sits in an area of ecological sensitivity, close to the Heslington Tillmire SSSI and other SINCs.
- 2.2.9 The draft proposals map identifies an area of land ("OS10") as a "New Area for Nature Conservation on land to the South of A64 in association with ST15 (Reg 19, 2018)". No evidence has been provided to demonstrate that OS10 is sufficient to provide the "no net loss" of biodiversity as required by Draft Policy SS13.
- 2.2.10 Furthermore, as described elsewhere in Sandby & Oakgate's representations by Lawrence Walker Engineering, the location of the junction on the A64 to provide the indicative new access road to ST15 (Reg 19, 2018) would not be permitted due to highways concerns. Any junction would need to be further west and therefore the access road to ST15 (Reg 19, 2018) would need to pass through OS10, rendering it incapable of providing the ecological mitigation required by Draft Policy SS13.

- 2.2.11 Finally, the land represented by OS10 is controlled by a third party landowner and there is no published evidence let alone any certainty that this land would be made available to support the development of ST15 (Reg 19, 2018).
- 2.2.12 Given the above, the allocation of OS10 as ecological mitigation land is flawed and would not enable the ST15 (Reg 19, 2018) allocation to be delivered.
- 2.2.13 CYC have assumed without any published justification that in order to adhere to a “no net loss” of biodiversity for ST15 (Reg 19, 2018), significant ecological mitigation would be needed, requiring the provision of 192 hectares of land as “set-aside” for this purpose. The cost of the ecological works, and more significantly the cost of acquiring this significant area of land, damages the viability of the scheme.

Conclusion on abnormal costs

- 2.2.14 ST15 (Reg 19, 2018) will require significant, up-front investment in order to open the site up for development. These costs have a significant negative effect on both the cashflow and the fundability of the ST15 (Reg 19, 2018) draft allocation.
- 2.2.15 The size of the proposed means that there is insufficient value to be gained from productive development to off-set these site abnormal costs whilst generating a competitive land return to the landowners. As paragraph 173 of the NPPF recognises, in order for development to happen, it must be capable of generating competitive returns to both landowner and developer. The inability of ST15 (Reg 19, 2018) to generate a reasonable land price for the landowners means that land would not be released for development and therefore the scheme would not be delivered.

2.3 Delivery / Absorption of new homes

- 2.3.1 In addition to the cost items set out above, consideration should be given to the ability of ST15 (Reg 19, 2018) to deliver the 2,200 homes by the end of the Plan Period as envisaged in Draft Policy SS13 of the Local Plan (Publication Draft – February 2018).
- 2.3.2 On the assumption of first sales occurring in 2022 this equates to a period of 11 years, and an annual delivery requirement of 200 units. In the event that first sales are pushed back as a result of a delay in plan adoption or planning application, the annual delivery rate requirement would increase further.
- 2.3.3 Assuming that development commences on the greenfield element of ST15 (Reg 19, 2018), and therefore that 30% of units are required to be affordable under Draft Policy H10, annual delivery of 140 private units would be required in order to achieve the policy trajectory. On the assumption that a housebuilder will sell three units per month per sales outlet, this means a delivery of 36 private units per outlet per annum, and therefore a requirement for four sales outlets to be operating simultaneously from first marketing in 2022 to achieve the delivery target of 140 private homes per annum. It is assumed that the 30% affordable housing would be delivered pro-rata as the private housing is delivered.
- 2.3.4 In our experience it would be unusual for any new settlement to be able to sustain four sales outlets simultaneously from first marketing. It is more usual for sales to start gradually from one or two outlets before sufficient demand exists to operate more.
- 2.3.5 Furthermore, we consider that the relatively isolated location of ST15 (Reg 19, 2018), and more specifically its single access and lack of direct road frontage will make marketing of units a

challenge, at least in initial phases until momentum builds and the development establishes its own sense of place.

- 2.3.6 Although a second access to the site from Elvington Lane would be technically feasible, it would require circa one mile of access road from Elvington Lane to the ST15 (Reg 19, 2018) allocation area, and would not provide any direct road frontage to aid marketability of the houses within the development.
- 2.3.7 In the event that a lower amount of affordable housing were to be required (taking into account the target percentage of 20% for large brownfield sites as set out in Draft Policy H10) then an even greater onus on sales of private units would be required to achieve the delivery targets for the plan period, which given the access and frontage issues described above, would appear to be challenging.
- 2.3.8 A combination of the above factors suggest that the desired delivery of 2,200 units from ST15 (Reg 19, 2018) over the plan period would be very ambitious, and in our opinion unrealistic.

2.4 Land ownership

- 2.4.1 ST15 (Reg 19, 2018) comprises land controlled by Sandby & Oakgate , but also includes land controlled by a third party. As there is no formal relationship between Sandby & Oakgate and the third party, there is a risk that the third party may not bring their land forward to participate with Sandby & Oakgate in the promotion of the site. If sensible terms cannot be agreed between the parties, then there is a risk that the land would not come forward which presents a significant risk to the comprehensive delivery of ST15 (Reg 19, 2018).
- 2.4.2 In addition to the land identified for ST15 (Reg 19, 2018), a significant area of land has been identified as new open space (OS10). This area is required to support the ecological mitigation of ST15 (Reg 19, 2018) itself. This land is not within the control of Sandby & Oakgate and it is not clear whether it would be available. Without the land, ST15 (Reg 19, 2018) could not be delivered. Even more unsound is the fact that the only access to ST15 and the A64 would have to come through the OS 10 land compromising its ability to compensate and offset biodiversity impacts.

2.5 Conclusions on Key Issue 1

- 2.5.1 There are three key challenges to delivering Draft Allocation ST15 (Reg 19, 2018): the level of abnormal costs required to be incurred to open up the site for development; the ability of the site to deliver units in line with the targets set out in the Draft Local Plan, and; the challenge of bringing together numerous land owners to collaborate and make land available for development.
- 2.5.2 Each of these challenges in isolation risks causing the failure of ST15 (Reg 19, 2018) to deliver. Most significantly, the high level of abnormal costs required to open up the site for development may make the development unfundable, and therefore undeliverable.

3.0 Key Issue 2: Changes which could allow the delivery challenges of ST15 (Reg 19, 2018) to be overcome

3.1.1 The challenges to delivering ST15 (Reg 19, 2018) are set out in Key Issue 1 above. In order to address these challenges, the following broad strategies could contribute to making ST15 (Reg 19, 2018) viable:

- **Increase in development value:** This could be achieved through either an increase in the value of the land that is developed or through an increased land allocation to provide a greater amount of productive development
- **Introduction of public subsidy:** public subsidy could be used to help pay for some of the infrastructure upgrade costs but there is no evidence that this is available.
- **Cost reduction:** A general reduction in the cost of delivering the scheme would improve scheme viability

3.1.2 These strategies are discussed below.

3.2 Increase in development value

3.2.1 Assuming a fixed boundary for ST15 (Reg 19, 2018), greater value could be obtained from the land through increasing development density or decreasing the amount of affordable housing provision that is required.

3.2.2 An increase in development density may be technically feasible, but would sit against the ambition of Draft Policy SS13 to deliver a “sustainable garden village” as it would require divergence from the masterplanning principles of a garden village.

3.2.3 A reduction in the affordable housing requirement for ST15 (Reg 19, 2018) would allow land value to increase, but this would in turn conflict with the target provision of 30% for large greenfield sites as set out in Draft Policy H10.

3.2.4 An increase in the developable area of ST15 (Reg 19, 2018) would increase the amount of productive development to share the burden of the abnormal costs to open up the site and would help to allow the ambitions of Draft Policies SS13 and H10 to be achieved.

3.3 Introduction of Public Subsidy

3.3.1 As noted above, ST15 (Reg 19, 2018) requires significant up-front infrastructure investment prior to the first home being delivered. Some of this infrastructure cost upgrade could, in accordance with Draft Policy DM1, be funded through Council budgets, national Government funding, or funding from other public bodies and agencies (such as the Local Enterprise Partnership).

3.3.2 The level of subsidy that is available from these sources is currently unplanned and so unknown and therefore, in accordance with the principles of assessing development viability, it must be assumed that the full costs of infrastructure investment will need to be borne by the developer of ST15 (Reg 19, 2018) and as such the ST15 (Reg 19, 2018) scheme could not be judged as being viable.

3.3.3 In the event that third-party funding was to be available to contribute to funding for the infrastructure a total of c. £23.2m would need to be available over a period of four years from the

granting of an outline permission to fund the infrastructure. This is broadly equivalent to 80% of the estimated total cost of the off-site highways infrastructure and it would be unusual for this percentage of the total cost of infrastructure for a new development to be met by public funds even if public funds were to be available.

- 3.3.4 On this basis it appears unlikely that sufficient public funding could be made available to ensure that ST15 (Reg 19, 2018) becomes viable within the current scheme constraints.

3.4 Cost Reduction

- 3.4.1 A reduction in cost for delivering ST15 (Reg 19, 2018) would improve scheme viability. Such a cost reduction is unlikely to be achieved without significantly compromising the design and sustainability aims of Draft Policy SS13 and therefore a significant general cost reduction sufficient to make ST15 (Reg 19, 2018) viable is in our view unrealistic.

3.5 Conclusions

- 3.5.1 As noted above there are three main ways in which ST15 (Reg 19, 2018) could be made viable. These would involve compromising on the vision set out in the Draft Local Plan and / or adopting funding or value assumptions which are simply not realistic.
- 3.5.2 On this basis, none of the ways in which ST15 (Reg 19, 2018) could be made to work are likely to happen, and therefore alternatives which increase the development quantum appear to be the only way in which a large settlement to the south of York could be delivered. This points towards Sandby & Oakgate's vision for Langwith (Reg 19, 2018).

4.0 Key Issue 3: The deliverability of Langwith (Reg 19, 2018)

- 4.1.1 Given the deliverability challenges of ST15 (Reg 19, 2018), Sandby & Oakgate have prepared an alternative development which is able to overcome these challenges. This settlement is called Langwith (Reg 19, 2018) Garden Village ("Langwith (Reg 19, 2018)").
- 4.1.2 Langwith (Reg 19, 2018) would see the delivery of 4,000 new homes on a site which comprises much of the area of ST15 (Reg 19, 2018), but crucially omits the third party land ownership. All land within Langwith (Reg 19, 2018) is controlled by Sandby & Oakgate, addressing one of the key challenges of delivering ST15 (Reg 19, 2018).
- 4.1.3 Langwith (Reg 19, 2018) would incorporate the redevelopment of the eastern portion of Elvington Airfield, thereby increasing the percentage of previously developed land that would be included in the allocation compared to ST15 (Reg 19, 2018). The inclusion of the eastern part of the airfield would allow a second access point to the site from Elvington Lane.
- 4.1.4 Although the inclusion of a second access on to Elvington Lane would require upgrade works to Elvington Lane which are not required by ST15 (Reg 19, 2018), the amount of works required on the A64 and Grimston Bar would be reduced when compared with ST15 (Reg 19, 2018). The overall cost of off-site highways improvements is substantially less for Langwith (Reg 19, 2018) than ST15 (Reg 19, 2018).
- 4.1.5 The inclusion of this second access point would give Langwith (Reg 19, 2018) direct road frontage on to Elvington Lane, helping to make the site more visible to prospective purchasers of homes. The operation of two distinct entrances to Langwith (Reg 19, 2018) will allow more sales

outlets to operate simultaneously without over-competing. The combination of these two factors improve the ability of the site to deliver and exceed the target yield of 2,200 homes within the plan period, something which ST15 (Reg 19, 2018) is unlikely to do.

- 4.1.6 The increase in units on Langwith (Reg 19, 2018), compared with ST15 (Reg 19, 2018), allows the impact of the abnormal costs to be absorbed more effectively giving the landowners a return which would be considered competitive and at which a rational landowner would be prepared to release land for development.

5.0 Conclusion

- 5.1.1 In conclusion, Langwith (Reg 19, 2018) responds to and overcomes the key challenges to delivery of ST15 (Reg 19, 2018) and can therefore be considered both viable and therefore deliverable.
- 5.1.2 On this basis it responds to the tests set out in paragraph 182 of the NPPF and an allocation of land for the development of Langwith (Reg 19, 2018) could be considered sound.



BIDWELLS



APPENDIX 3

TRANSPORT APPRAISAL

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The Oakgate/Caddick Group PLC

Land West of Elvington Lane

(Langwith)

City of York

TRANSPORT APPRAISAL (Technical Note TN1)

Report on Proposed Allocation of Land North of Elvington Lane by City of York Council (Policy SS13)

April 2018

**Proposed Allocation of Land West of Elvington Lane by City of York Council
(Policy SS13 & Strategic Allocation ST15)**

Transport Appraisal (Technical Note TN1) - Executive Summary

This Technical Note (TN1) has been prepared by *Lawrence Walker Limited* (LWL) in response to a request by *Sandby Ltd & The Oakgate/Caddick Group PLC* to examine the traffic implications of the proposed Strategic Allocation ST15 by *City of York Council* (CoYC).

The report concludes that with respect to the 3,339 unit Strategic Allocation ST15:-

- i) The traffic modelling undertaken to date by CoYC is inadequate and does not identify locations where the network would be overloaded as result of the Plan, nor what mitigation is proposed to overcome such overloading. As a result, it is unfit for purpose and does not allow the potentially large cumulative impact of traffic from multiple allocations to be properly scrutinised in accordance with NPPF Para 162;
- ii) The traffic modelling does not provide any evidence to demonstrate that the existing A64 is wide enough to safely accommodate ST15. It may need to be three lanes wide from purely a weaving perspective east of the new A64 Link and as such, both the delivery and viability of ST15 must be put into doubt. This is contrary to Para 177 of the NPPF which requires a reasonable prospect of delivery;
- iii) Policies SS13(xii) and SS22(viii) are not co-joined in *requiring* both sites to make use of the new junction onto the A64, thereby reducing the impact on the Trunk Road;
- iv) The traffic modelling does not explore the use of Elvington Lane as a potential second point of access in accordance with Policy SS13(xii). This would again help alleviate weaving issues along the A64 to avoid conflict with Para 3.67 of The Plan and allow compliance with Para 157 of the NPPF;
- v) The Proposals Map for ST15 would see the A64 Link Road built to the east of Common Lane, which would require demolition of the existing Overbridge to accommodate the west-facing slip-roads. It would also be too close to Grimston Bar to comply with Para 4.36 of TD22/06 of the DMRB, which requires at least 1km between it and the new east-facing slip-roads. The proposal would therefore be unviable and unsafe, whilst re-location of the Link Road to the west of Common Lane would route it though OS10, conflicting with Policy GI5 and rendering both unsound;
- vi) The site cannot adequately be served by Public Transport. This is because Policies SS13(xvi) and SS22(v) are not co-joined in *requiring* the delivery of an integrated Bus Link through the University between ST15 and the Grimston Bar P&R to serve both sites. Neither allocation then meets the expectations of Para 17 of the NPPF, which requires LPA's to *"make the fullest possible use of public transport"*, and;
- vii) Relocation of the A64 Link Road to the west of Common Lane and the re-orientation of OS10 would resolve weaving issues along the A64. Additional traffic modelling then shows that with the selective use of Elvington Lane, it can remain at two lanes and the resulting impacts at Grimston Bar can be mitigated and are viable when spread across the larger number of houses proposed at Langwith, even in isolation. Access to and through the University via the A64 can be accommodated and would be encouraged.

Based on the above, it is LWL's opinion that Strategic Allocation ST15 would fail to comply with Paras 17, 157, 162 & 177 of the NPPF as drafted, and ultimately with Para 32. It is therefore unsound when judged against the four tests set-out at Para 182 and should be replaced in the Local Plan with the larger and fully compliant 4,018 unit Langwith proposal.

**Land West of Elvington Lane
(Langwith)
City of York**

Technical Note 1

**Report on Proposed Allocation of
Land West of Elvington Lane by
City of York Council
(Policy SS13)**

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LAND WEST OF ELVINGTON LANE – CITY OF YORK (Langwith)

Technical Note 1

Report on Proposed Allocation of Land West of Elvington Lane by City of York Council (Policy SS13 & Allocation ST15)

1.0 [Introduction](#)

General

- 1.01 This *Technical Note* (TN1) has been prepared by Mr. Steven Phillip Johnstone as Engineering Director of *Lawrence Walker Limited* (LWL); a specialist Transport Planning & Highways Consultancy. Mr. Johnstone is a Chartered Engineer; a Member of the Institution of Civil Engineers and a Member of the Chartered Institution of Highways and Transportation and has over 40 years of experience in dealing with transport related matters. All of the highways infrastructure costings used by Bidwells in their appraisal have also been provided by Mr. Johnstone.
- 2.01 TN1 responds to a request by *Sandby Ltd & The Oakgate/Caddick Group Plc* (The Developers) to examine the traffic implications of a proposed housing allocation by *City of York Council* (CoYC) at Elvington Airfield. It would see 3,339 units constructed across the site as shown at **Appendix A**, with 2,200 being provided within the Plan Period. The site is known as *Strategic Allocation ST15* (ST15) and is covered by Draft Policy SS13.
- 1.02 CoYC is a Unitary Authority with responsibility for all highways around York bar the A64, which is instead controlled by *Highways England* (HE). In that capacity CoYC has provided a *Transport Topic Paper* (TTP) in support of ST15 and this TN1 effectively provides a critique of the September 2017 version of that document, together with an overview of other transport issues.

Scope of Report

- 1.03 The report covers seven aspects of the ST15 allocation, being:-
- i) Whether the TTP provided by CoYC is fit for purpose;
 - ii) Whether the site could progress without major upgrading works to the A64 being required within the Plan Period;
 - iii) Whether Policy SS22 [covering proposed expansion of the *University of York* (UoY)] is properly aligned with SS13, thereby enabling the efficient delivery of both sites;
 - iv) Whether secondary access can and should be provided that avoids both the A64 and unsuitable local roads to the north and east;
 - v) Whether the route proposed for the main A64 Link Road is technically feasible with respect to current design standards;
 - vi) Whether Public Transport services can be delivered to the site within the Plan Period on a commercially viable basis to comply with the requirements of the NPPF in terms of sustainable transport;
 - vii) How the site compares to Langwith; being a significantly larger and re-configured version of ST15 being promoted by The Developers.
- 1.04 Each aspect is now assessed in turn to determine whether, in LWL's view, the allocation can be regarded as sound in accordance with Para 182 of the NPPF.

2.0 Traffic Modelling

Key Limitations

3.01 There are two fundamental issues associated with the TTP that make it un-fit for assessing development at ST15 at this time. These are:-

- i) The TTP does not identify where the network would be overloaded, and;
- ii) No indication is provided that the A64 past the site is of sufficient width to accommodate ST15.

The TTP & Traffic Modelling

2.02 Fundamentally, the TTP is little more than a glossy over-view and does nothing to support CoYC's transport case for the allocation of ST15. It is equally unclear from reading the document as to whether further and more detail work has been undertaken, and if not, when such detail will be made available to The Developers. Without it, it is not possible for the reader to determine what mitigation works will be needed to enable the delivery of ST15 or determine their cost, leaving the allocation unsound and potentially unviable in LWL's view at this time.

2.03 With reference to **Appendix B**, the following issues within the TTP are noted. PCU's refers to *Passenger Car Units*; which treats all vehicles as car equivalents.

- i) **Extract 1** shows the changes in traffic volumes expected over the Plan Period on key roads in and around York. As might be expected, the A64 is forecast to experience significant changes in flows over both Peak Hours, with the legend indicating this to be over 500 PCU's in either direction. What is not clear from the plots however is exactly how big the change is, with the reader left instead to debate as to whether it is exactly 500 PCU's, or indeed any other number of any magnitude beyond this. The plots are inadequate and should have been accompanied by those showing the actual change on each Link in numerical form;
- ii) At **Extract 2**, Figures 13 & 14 purport to show the resultant speeds on all of the local roads by 2032/33 following delivery of the Local Plan. Unfortunately the key section of the A64 is left uncoloured, giving the reader no indication at all as to what the final speed along the Trunk Road between ST15 and the critical Grimston Bar Interchange is. This is not helped by Figures 15 & 16, which show a change in speed of more than a 10mph drop, but then give no reference point to allow a meaningful comparison to be made. A 10mph drop from 70mph to 60mph is one thing, but a 20mph drop from 30mph to 10mph is quite something else. Without suitable data it is impossible to determine how busy the A64 will become, and thus how much impact ST15 will actually have. It should also be noted here that Table 4 does little by way of further enlightenment in this respect;
- iii) It is fully recognised that by 2033 the A64 will be busy and that desperately needed housing must be provided somewhere to meet local needs. The data presented in the TTP however does not quantify how much traffic remains on the A64 and how much diverts (or re-assigns) off it onto other less suitable routes as a result of ST15. In reality some traffic already on the A64 will switch to other routes because of increased congestion and this has in no way been quantified or even touched upon in the TTP, leaving the reader unable to properly consider the site's potential local impact;

- iv) The TTP only considers impact from ST15 up to 2033, commensurate with construction of the first 2,200 units. LWL would have expected to see at least a *Sensitivity Test* for the full 3,339 unit scheme, thereby allowing the reader to see the complete picture over time of what CoYC is actually proposing to deliver, and finally;
- v) The extent to which further work is to be undertaken to determine what mitigation is to be required of each allocation is completely absent from the conclusions. Instead, the TTP simply states that “...*The council is aware that further work may be required to identify additional transport (and other) infrastructure to lessen the impact of development, taking into account whether it is necessary, feasible, deliverable, and does not impose such a burden as to render the Local Plan unviable.*” This is an unacceptable statement in LWL’s view and should have been refined at the very least, since without this work it is indeed impossible to determine if any or all of the planned allocations are viable, including ST15. Should the amount of mitigation prove to be too large, it is then unclear as to whether CoYC would delete individual sites or simply not provide the required level of mitigation.

2.04 Based then on the above reasoning, it must be concluded that the traffic modelling undertaken to date by CoYC is inadequate as it does not identify locations where the network would be overloaded as result of the Plan, nor what mitigation is proposed to overcome such overloading. As a result, it is unfit for purpose and does not allow the potentially severe cumulative impact of traffic from multiple allocations to be properly scrutinised. This is likely to ultimately lead to a breach of Para 32 of the NPPF along particularly the A64, as well as other local routes and renders the entire Local Plan unsound as it stands.

Capacity of the A64

2.05 The main access into ST15 is intended to be from a new *Grade Separated Junction* (GSJ) built onto the A64 to the south of the existing Grimston Bar Interchange. This creates weaving issues between the two junctions [where traffic tries to both join and leave a short stretch of road in close proximity and as a result has to “weave” to reach its destination] and LWL has previously raised concerns with both CoYC and HE that three lanes on the A64 might be needed to deal with them safely. HE has however consistently advised that this would not be an acceptable approach (citing the non-uniform nature of such a provision when compared to the remaining two lane sections) and instead requested that more detailed modelling in the form of a micro-simulation be provided to determine the extent of the problem. This has not been undertaken to date by CoYC and there is therefore a serious doubt as to whether the A64 is actually wide enough to accommodate ST15 as currently planned. If it were to prove not to be, then widening would be required, which is unlikely to be affordable, deliverable, or indeed supported by HE as the owner of the road.

2.06 In essence, the traffic modelling produced by CoYC to date does not provide any evidence to demonstrate that the existing A64 is wide enough to safely accommodate ST15 or indeed other allocations. It may need to be three lanes wide from purely a weaving perspective east of the new A64 Link Road (irrespective of any main-line capacity issues) and as such, both the delivery and viability of ST15 must be put into doubt. The current allocation is therefore doubly unsound, as is the entire Local Plan with respect to the A64.

3.0 [Integration of Policies](#)

Current Draft Policies

- 4.01 In addition to Policy SS13 covering the delivery of *Strategic Allocation* ST15, CoYC is also proposing to allocate land adjacent to the UoY for expansion. Policy SS22 refers and the allocation itself is termed *Strategic Allocation* ST27.

Integration of Policies

- 3.02 As can be seen from the *Site Location Plan* at **Appendix A**, there is a considerable amount of synergy between ST15 and ST27. Both sit alongside the A64; both depend upon the Grimston Bar Interchange for much of their traffic routing and both are likely to be served in terms of Public Transport through an extension of the existing Grimston Bar P&R service. This is of course out-with any direct interaction, whereby jobs and homes meet each other's needs in close proximity. To not then specifically design the two allocations to closely align would be a wasted opportunity in LWL's view, and would more importantly also see the loss of a potential safety-valve for the A64.

- 3.03 As currently drafted, Policy SS22(viii) requires that ST27:-

“...Explore providing access through an enhanced road junction on the A64 to the south of the site. There may also be an opportunity for a further restricted/limited southern access to the University off the A64 in conjunction with ST15 (Land West of Elvington Road). Access to the A64 would require approval of Highways England”

- 3.04 Clearly this would be a sensible provision and as is discussed later in this TN1, would offer the opportunity to remove a significant number of both new and existing UoY trips from Grimston Bar and the A1079. If ST27 were then connected directly to ST15 via the new A64 Junction, trips between the two could be made more easily, and importantly without the need to negotiate the A64 at all, leading to reduced demand for weaving on the A64 (Para 2.05 above refers).

- 3.05 Turning then to ST15, Policy SS13(xii) states that the allocation should:-

“...Ensure provision of necessary transport infrastructure to access the site with primary access via the A64 (as shown on the proposals map)...”

Whilst Policy SS13(xviii) notes that it should also:-

“...Exploit synergies with the proposed university expansion in terms of site servicing including transport...”

- 3.06 Neither is disputed by LWL. What is disputed is the ability of the two sites to work in unison without a clear and structured set of policies specifically designed to produce an integrated outcome. To this end, ST15 should be *required* to promote a comprehensive solution for the A64 Junction and agree it with HE, whilst the UoY should then in turn be *required* to make use of it and also provide a through-route to the Grimston Bar P&R for buses. It is accepted that this route should not allow for general car usage by ST15 traffic or provide a through-route to the A1079, but for ST27 it would nevertheless allow access to the A64 for traffic that would otherwise have to travel via Grimston Bar. This in turn would significantly reduce demand at the existing junction and along the A64 to the south.

- 3.07 As currently drafted, Policies SS13(xii) and SS22(viii) are not co-joined in LWL's view in not *requiring* both sites to make use of the new junction onto the A64, thereby reducing the impact on the Trunk Road. As a result, it is likely that Para 32 of the NPPF will ultimately be breached at both Grimston Bar and along the A64 itself, due to the unresolved weaving issues highlighted above at Para 2.05. Both policies are already in conflict the Para 157 however, as it clearly requires an element of joined-up thinking to be deployed as part of any Local Plan's preparation and that would appear to be absent here.

4.0 Secondary Access Issues

The Current Position

4.01 It is understood that the proposal for accessing ST15 would see only one point of access being provided, together with a “potential” secondary route onto Elvington Lane. In this context, Policy SS13(xii) states that access should be primarily from the A64, with:-

“...a potential secondary access via Elvington Lane...”

4.02 Now it is not uncommon for a single point of access to be used to serve residential sites. What is uncommon however is the scale. At ST15 even for the first 2,200 units such a solution would be rare, whilst for the full 3,339 unit scheme it would surely be unprecedented. It is hard to imagine upwards of 10,000 people being trapped on the site for hours whilst (say) a diesel spillage is dealt with at the A64, when it then becomes a matter of safety rather than a physical blockage. The risk of fire or explosion would prevent the use of the main access in this instance, suggesting that CoYC’s solution is not robust. Indeed to expect an entire town to shut-down every time there is an incident affecting the one road into and out of it is not credible as a means of access. Instead, the wording of Policy SS13(xii) must be amended to *require* the delivery of the Elvington Lane secondary access, as a matter of priority. Without such a change ST15 cannot progress, as it would then be in direct conflict with Para 157 of the NPPF which requires that LPA’s *“...plan positively for the development and infrastructure required in the area...”*

Traffic Modelling & Impacts

4.03 Irrespective of the safety and operational aspects noted above, there are traffic modelling and traffic impact issues that also need to be considered as part of the allocation. To date, CoYC has only modelled the potential Elvington Lane access on the assumption that it would *not* generally be used by ST15 traffic, which can be clearly seen on **Extract 3** from the TTP at **Appendix A**. This has two consequences for the validity of the modelling, which are as follows:-

- i) It is not possible from the runs to-date to determine what the impacts might be if the Elvington Lane access *were* to be used to a significant degree by ST15 traffic. Without a run specifically allowing this case to be tested, it cannot be ascertained if allowing such access would cause issues which would then require mitigation in their own right, and;
- ii) It is equally not possible to determine what the *beneficial* effects of removing traffic from the A64 by allowing it to use Elvington Lane might be. Again, without this information, a sensible consideration of what use should be made of Elvington Lane is not possible.

4.04 Bearing in mind that at least some form of access via Elvington Lane will be needed just to overcome the single-point-of-access issue, both of the above scenarios need to be run prior to the Local Plan progressing. This should be done so as to comply with Para 162 of the NPPF, which requires that LPA’s should *“...assess the quality and capacity of infrastructure for transport...”* as part of the Local Plan process.

5.0 [The A64 Link Road](#)

Minimum Design Requirements

- 5.01 As a new grade-separated access onto a Trunk Road, the A64 GSJ will need to comply with the *Design Manual for Roads and Bridges* (DMRB) and specifically TD22/06 – *Layout of Grade Separated Junctions*. It requires at Para 4.36 that at least 1km be provided between pairs of opposing slip-roads, when measured in accordance with Figure 4/9 of that document. Allowing for the slip-roads themselves, this basically means that the centre of the new junction cannot be closer than 2km from the centre of the existing Grimston Bar Interchange. This is the closest that can be achieved, **but may still not necessarily be acceptable in terms of weaving**. It should be noted therefore that anything less than 2km between slip-roads (i.e. 3k centre to centre) could still be unacceptable and would need to be tested (Para 2.05 above refers). Generally the lower the weaving length actually provided; the greater the demand to widen the A64 to three lanes.

The Current Position

- 5.02 *The Proposals Map* for ST15 would see the A64 Link Road built to the east of Common Lane, approximately 1.65km from the Grimston Bar Interchange. This would leave a maximum weaving length on the S/B carriageway of 750m, which is too short to comply with the absolute minimum TD22/06 requirement of 1km (**Appendix C – Option 1**) and is known not to be supported by HE. The proposal would also require the existing Common Lane Overbridge to be demolished to accommodate the south facing slip-roads, meaning that the scheme would be both unviable and unsafe.

Required Amendments to achieve Technical Compliance

- 5.03 In technical terms, re-location of the new A64 GSJ to the south of Common Lane in accordance with **Appendix D – Option 2** is the only option and this location has indeed already been agreed in principle with HE as part of the Langwith proposals on that basis. As it stands, such a location would route the Link Road though OS10 however, conflicting with Policy GI5 and rendering both unsound. Weaving associated with this re-located option is thought to be acceptable and is covered later in this TN1.
- 5.04 For the Local Plan to proceed on a sound technical basis, it will be necessary to re-locate the A64 GSJ to the south of Common Lane and amend the location and/or layout of OS10 to enable the Link Road to be accommodated.

6.0 Public Transport

The Base Position

6.01 Fundamentally, ST15 is a remote location that holds no synergy with any other community within the District from a transport perspective. It is the wrong side of the A64 and employment opportunities are sparse in the locality, which means all residents would seek to travel to York by car unless offered a high-quality direct and convenient alternative. The UoY on the other hand sits adjacent to the Grimston Bar P&R, from whence a rapid and frequent service already operates to and from the City Centre. Thus the ideal solution for both sites would be an extension of the existing P&R service into ST15 through the University.

The Draft Local Plan

6.02 Currently, the requirements for ST15 with respect to Public Transport are covered by Policy SS13(xvi). It states that the site should:-

“...Deliver high quality, frequent and accessible Public Transport services through the whole site which provide links to new community facilities, as well as to York City Centre and other appropriate service hubs, including University of York. A Public Transport hub at the Local Centre should provide appropriate local interchange and waiting facilities for new residents. It is envisaged such measures will enable upwards of 15% of trips to be undertaken using public transport.”

6.03 LWL would contend that this proposal would not be viable commercially for two reasons, being:-

- i) The ST15 development is not big enough to support what would need to be at worst a ten minute frequency bus service in isolation, and;
- ii) There is no requirement within the Plan to co-join ST15 with the UoY at either Policy SS13 or SS22. As a result, the opportunity to generate a combined revenue stream to support an extension of the Grimston Bar P&R serving both sites could well be lost.

6.04 To explore this premise, discussions with local operator First suggest that if a standalone service were to be provided to connect ST15 with the Grimston Bar P&R via the A1079 Hull Road and Elvington Lane, it would cost upwards of £300,000 per annum. On this basis it would be highly unlikely to ever generate enough revenue to become commercially viable (given the size of the development and the limited availability of third-party patronage) making it difficult to see how the site could be served by even the most modest of Public Transport offers nor comply with Para 177 of the NPPF with respect to viability. The result would then be car usage levels commensurate with other rural communities in the area (where over 90% of all journeys are currently made by private car) putting the initial 2,200 unit allocation in direct conflict with Para 17 of the NPPF. The latter states that LPA's should instead *“...Actively manage patterns of growth to make the fullest possible use of Public Transport...”*

6.05 ST15 clearly does not comply with this requirement, simply because it does not *require* Allocations ST15 and ST27 to deliver a joined-up service at Policies SS13(xvi) and SS22(v).

7.0 [Comparisons with Langwith](#)

The Developer's Vision

- 7.01 The promoters of Langwith see a greater opportunity for the ST15 allocation than the one that is currently portrayed by Policy SS13. As it stands, ST15 would be unviable in their view and more importantly, would not be deliverable from a transport perspective due to the numerous short-comings identified by LWL in this TN1. It would be unlikely to come forward as a result and an opportunity to deliver an exemplar development would be lost.
- 7.02 This section of TN1 explores why Langwith would succeed in this context, where ST15 would fail.

Deficiencies within ST15

- 7.03 The most important aspect of the case against ST15 as it stands is the potential need for the A64 to be widened to three lanes between the new GSJ and the Grimston Bar Interchange. Weaving is the issue here, and the shorter the weaving length provided between the two junctions, the greater the need for widening. The situation has however not been properly modelled by CoYC and it has instead been left to LWL on behalf of the Developers to explore the A64 in detail in conjunction with HE. This work has been ongoing for some time with respect to Langwith and the most recent results are presented at **Appendix E**.
- 7.04 Fundamentally, there are three issues to address in order to allow the A64 to remain at its existing width throughout the Plan Period. These comprise:-
- i) The need to maximise the weaving length provided between the new GSJ and the Grimston Bar Interchange whilst still avoiding the Common Lane Overbridge;
 - ii) The need to reduce the amount of traffic using the A64 over the affected length, and;
 - iii) The need to reduce the capita cost per dwelling resulting from external highway works along the A64 and at Grimston Bar to affordable levels.

- 7.05 In addition, both ST15 and ST27 would suffer from a lack of connectivity if delivered in the form proposed by CoYC. This is because there would be no guarantee of a second access for the UoY being provided at Policy SS22, nor a through-route for Public Transport as part of either Policy. Both of these aspects would need to be addressed before an allocation at either site could be described as sustainable or viable in accordance with the Paras 17 & 177 of the NPPF.

Procedural Objectives

- 7.06 Overall, the proposals with respect to transport for Langwith are identified at **Appendix F** and have been developed specifically to comply with the viability, sustainability and procedural requirements of Paras 17, 157, 162 & 177 of the NPPF. ST15 fails to comply with any of these, making it unsound when judged against Para 182. It is therefore the Developer's aim to seek amendments to Draft Policies SS13 and SS22 as described below that would help restore the soundness of The Plan by effectively substituting ST15 with Langwith.

The Langwith Proposal

- 7.07 The Developer's vision for the ST15 allocation would see the site transformed and re-configured to deliver 4,018 units in accordance with **Appendix D**. The A64 access would be moved to the west, whilst proper integration with the UoY would be built-in to the Masterplan from day-one. This would enable a through-route for Public Transport, Walking & Cycling to be accommodated, with jobs and housing properly linked. Full alignment with twin Transport Policies T5 & T6 with respect to non-car modes would then be achieved, which are policies that are wholly supported by the Developers.
- 7.08 Use of Elvington Lane as both an initial means of access and an ultimate secondary access would be an important feature, thereby reducing traffic demand along both the A64 and through the Grimston Bar Interchange whilst helping early viability. It should be noted here that Policy T4(iii) is not credible in this respect, since the improvements it seeks could not be funded by ST15 in isolation. Without them (and in the absence of Elvington Lane as an initial access) how then could ST15 progress without causing severe impact? It could not, but Langwith could as it would take initial access from Elvington Lane and not the A64. It would also *require* use of the new A64 GSJ once built to be incorporated into ST27, which in turn would greatly reduce the scale and cost of the improvements eventually needed at Grimston Bar (**Appendix F**). When spread over the greater number of houses proposed and pushed back in the programme as per **Figure 1**, Langwith then becomes viable (even if asked to bear the entire Grimston Bar burden by itself) where ST15 is not, and in control of its own destiny where ST15 is clearly not. This is an important feature of Langwith and one that would obviate the need for Policy T4(iii) completely, greatly adding to the viability of the entire Local Plan.
- 7.09 Relocation of the A64 Link Road to the west of Common Lane and the re-orientation of OS10 would resolve weaving issues along the A64. Additional traffic modelling then shows that with the selective use of Elvington Lane as noted above, it can remain at two lanes.
- 7.10 Finally access to and through the University via the A64 can be accommodated and would be encouraged, as can be seen at **Figure 1**. It would not be a pre-requisite however for Public Transport, as whilst clearly desirable, the larger site would be of sufficient scale to deliver its own commercial alternative via Elvington Lane if UoY expansion proposals were not to materialise. It should be noted here that ST15 would not be able to deploy this option as a reserve, since it is not currently a pre-requisite of Policy SS13 that an access onto Elivington Lane be provided. Without it (and in the absence of the route through the University) ST15 buses would have to make use of the A64, meaning that the GSJ would need to be provided at day-one before any buses at all could operate. That would be neither possible nor viable, as discussed above.

8.0 Summary & Conclusions

Summary

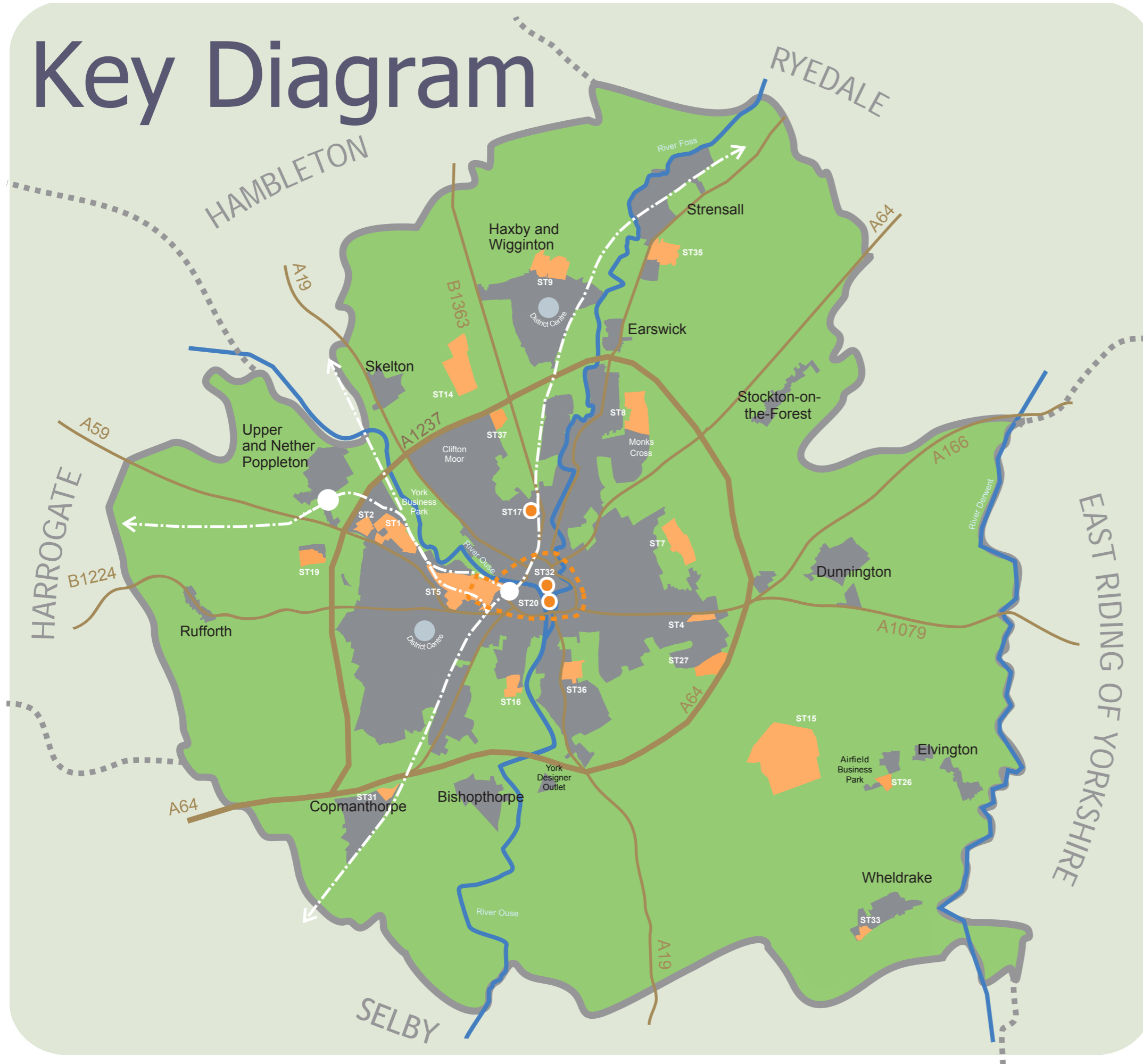
- 8.01 This Technical Note (TN1) has been prepared by *Lawrence Walker Limited (LWL)* in response to a request by *Sandby Ltd & The Oakgate/Caddick Group Plc* (The Developers) to examine the traffic implications of a proposed housing allocation by *City of York Council (CoYC)* at Elvington Airfield. The proposed allocation would see 3,339 units constructed across the site as shown at Appendix A, with 2,200 being provided within the Plan Period. It is known as *Strategic Allocation ST15* (ST15) and is covered by Draft Policy SS13.
- 8.02 In support of ST15, CoYC has provided a *Transport Topic Paper (TTP)*. This TN1 effectively provides a critique of the September 2017 version of that document, together with an overview of other transport issues.

Conclusions

- 8.03 The main findings of the TN1 Report are as follows:-
- i) The traffic modelling undertaken to date by CoYC is inadequate and does not identify locations where the network would be overloaded, nor what mitigation is proposed to overcome such overloading. It additionally does not provide any evidence to demonstrate that the existing A64 is wide enough to safely accommodate ST15 at two lanes;
 - ii) Policies SS13(xii) and SS22(viii) are not aligned in *requiring* both sites to make use of the new junction onto the A64;
 - iii) The traffic modelling does not properly explore the use of Elvington Lane as a potential second point of access;
 - iv) *The Proposals Map* would see the A64 Link Road built to the east of Common Lane, which would require demolition of the existing Overbridge. It would also be too close to Grimston Bar to comply with Para 4.36 of TD22/06 of the DMRB, rendering the proposal both unviable and unsafe. Re-location of the Link Road on the other hand to the west of Common Lane would route it though OS10, conflicting with Policy GI5;
 - v) The site cannot adequately be served by Public Transport. This is because Policies SS13(xvi) and SS22(v) are not aligned in *requiring* the delivery of an integrated Bus Link through the University between ST15 and the Grimston Bar P&R to serve both sites, nor provide for the delivery of any viable alternative, and;
 - vi) The proposals put forward by Sandby Ltd and Oakgate PLC for Langwith would overcome all of the transport-related shortcomings identified by LWL with respect to ST15.
- 8.04 Based on the findings of this TN1, it is LWL's opinion that *Strategic Allocation ST15* would fail to comply with Paras 17, 157, 162 & 177 of the NNPF as drafted, and ultimately with Para 32. It is therefore unsound when judged against the four tests set-out at Para 182 and should be replaced in the Local Plan with the larger and fully compliant 4,018 unit Langwith proposal.

Appendix A
Site Location Plan

Key Diagram



- York's main built up areas
- General extent of the proposed Green Belt
- City Centre
- District Centres
- Strategic Sites**
- ST1 - British Sugar/Manor School
 - ST2 - Civil Service Sports Ground
 - ST4 - Land Adjacent to Hull Road
 - ST5 - York Central
 - ST7 - Land East of Metcalfe Lane
 - ST8 - Land North of Monks Cross
 - ST9 - Land North of Haxby
 - ST14 - Land West of Wigginton Road
 - ST15 - Land West of Elvington Lane
 - ST16 - Terry's Extension Sites
 - ST17 - Nestle South
 - ST19 - Land at Northminster Business Park
 - ST20 - Castle Gateway
 - ST26 - Land South of Airfield Business Park, Elvington
 - ST27 - University of York Expansion
 - ST31 - Land at Tadcaster Road, Copmanthorpe
 - ST32 - Hungate
 - ST33 - Station Yard, Wheldrake
 - ST35 - Queen Elizabeth Barracks, Strensall
 - ST36 - Imphal Barracks, Fulford Road
 - ST37 - Whitehall Grange, Wigginton Road
- Rivers
- Main Rail Network/Stations
- Main Road Network

The Key Diagram is for illustrative purposes only, showing Strategic Sites, and the general extent of York's Green Belt. For more detail and other sites (including housing and employment), allocations and designations please see the proposals map.

Appendix B
Extracts from the TTP

Figure 11 Local Plan growth change in traffic volumes AM Peak 2016 - 2032/33



Figure 12 Local Plan growth change in traffic volumes PM Peak 2016 - 2032/33

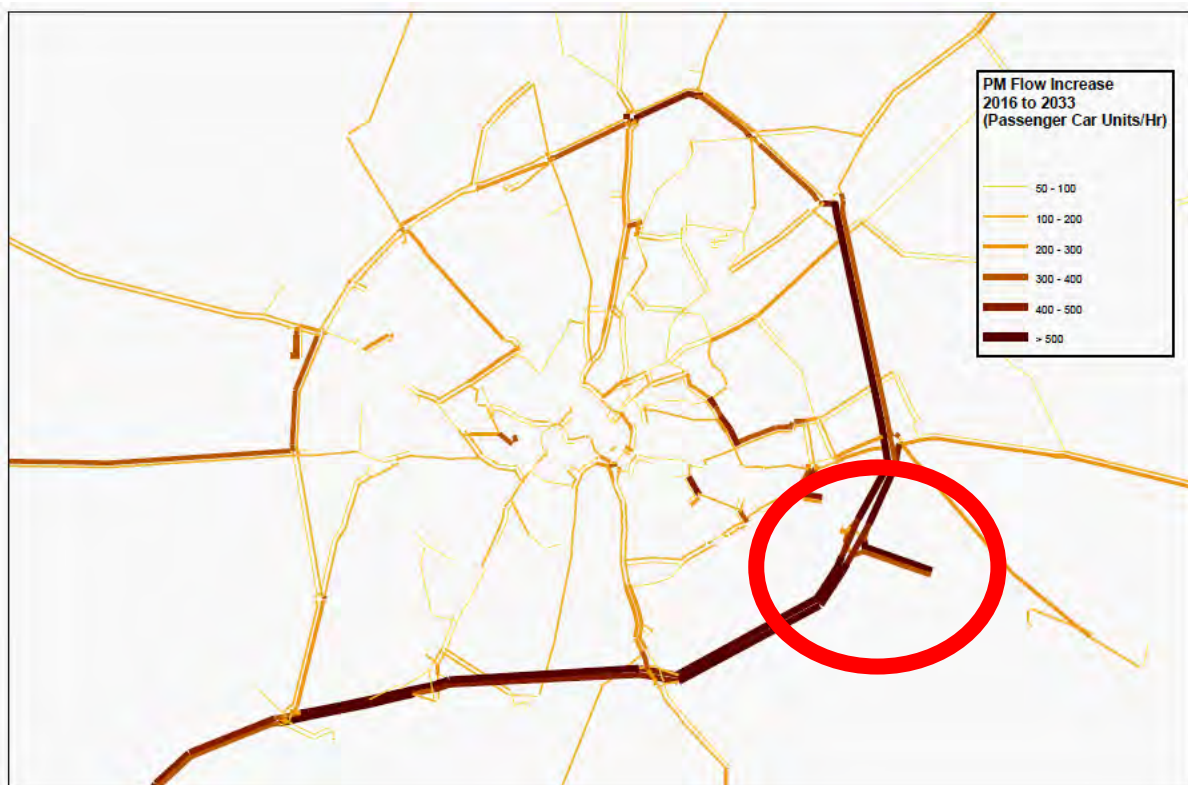


Figure 13 Local Plan growth traffic speeds AM Peak 2032/33

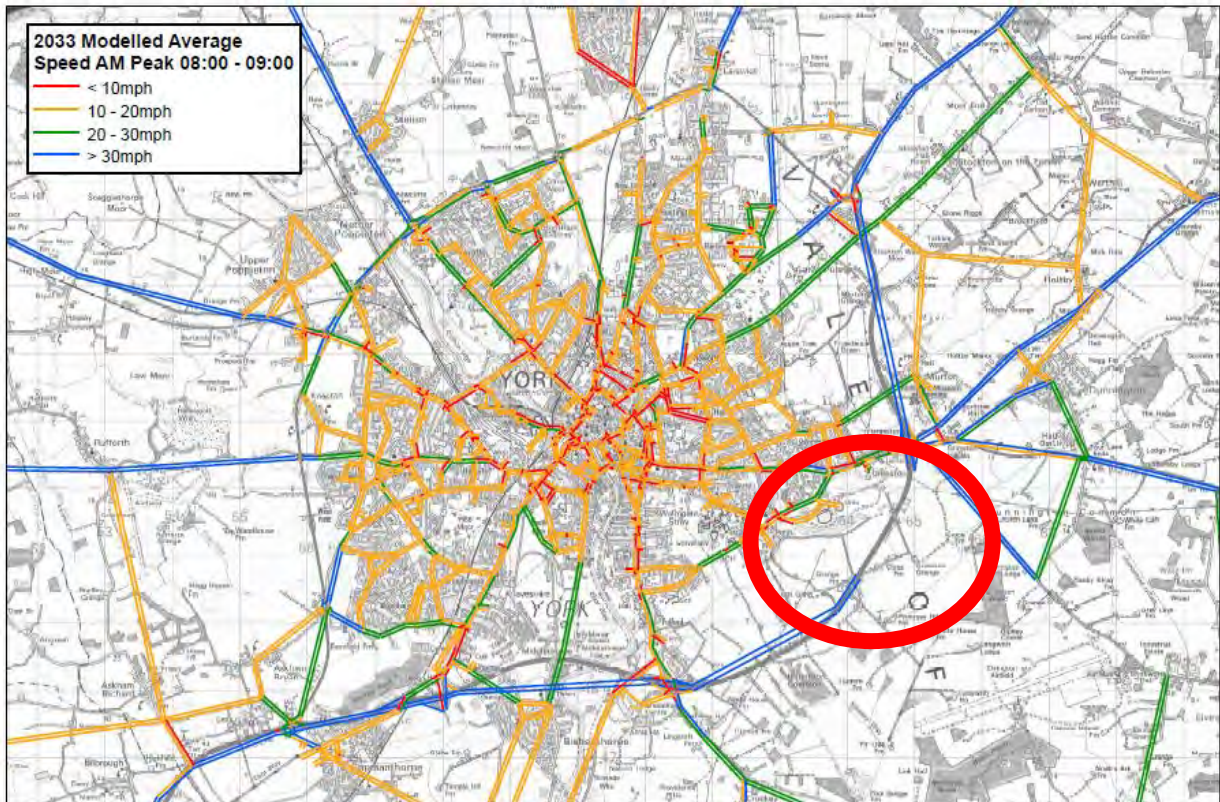


Figure 14 Local Plan growth traffic speeds PM Peak 2032/33

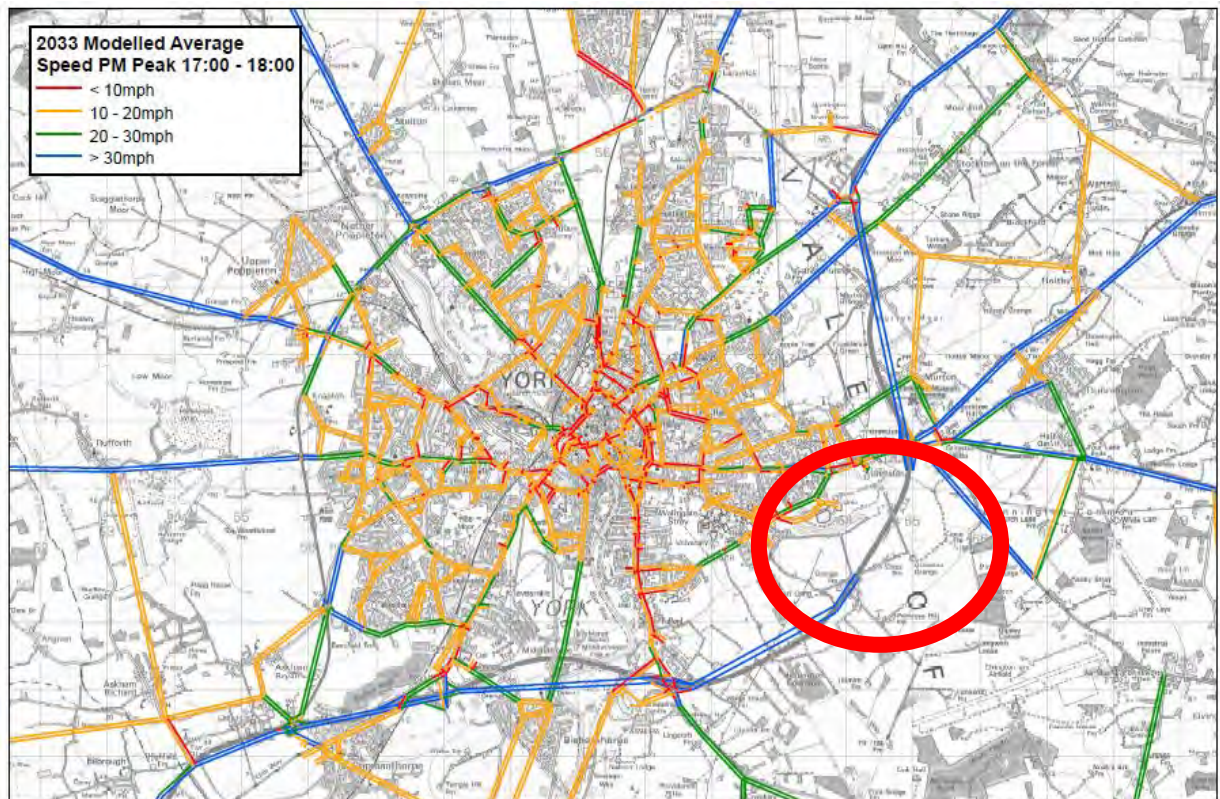


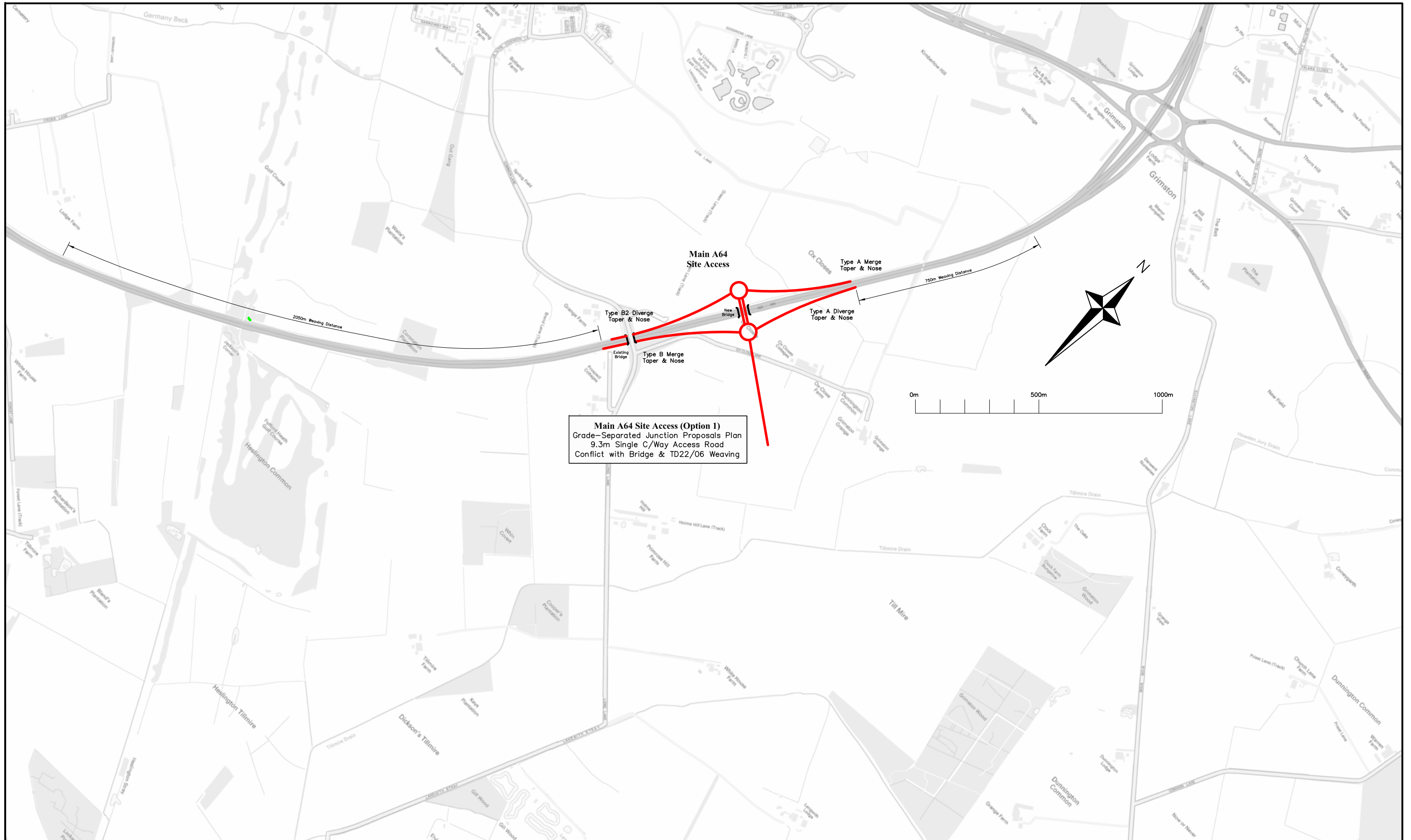
Figure 11 Local Plan growth change in traffic volumes AM Peak 2016 - 2032/33



Figure 12 Local Plan growth change in traffic volumes PM Peak 2016 - 2032/33



Appendix C
The A64 Junction



Main A64 Site Access (Option 1)
 Grade-Separated Junction Proposals Plan
 9.3m Single C/Way Access Road
 Conflict with Bridge & TD22/06 Weaving

Lawrence Walker Ltd
Church Farm
Leamington Hastings
Warks CV23 8DZ

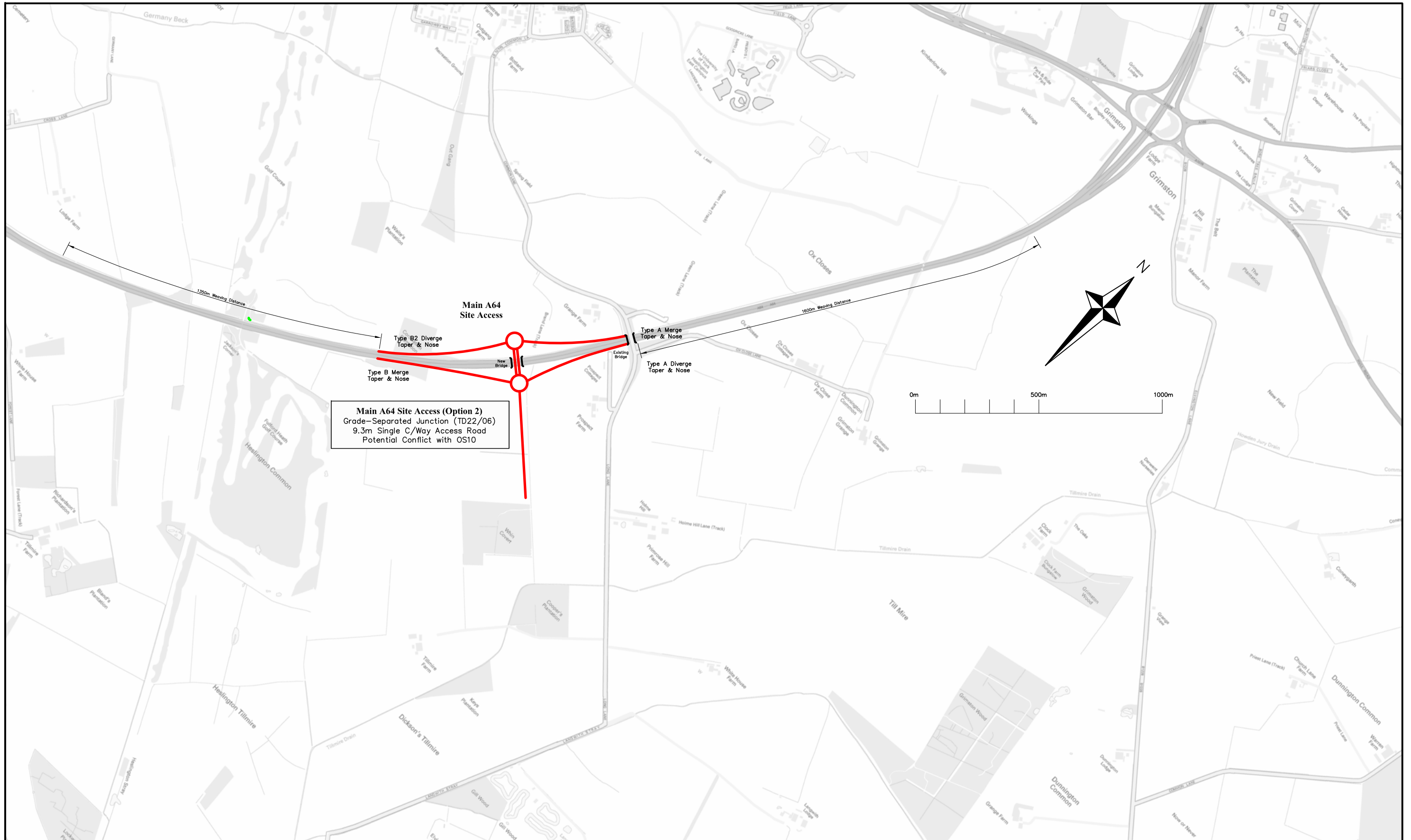
Key
 — Adopted Highways (A64 Principle Access)

Project
Allocation ST15

Title
A64 Site Access
Proposals Map Scheme

Drn. SPJ	Chkd.	App.	Date 19/03/18
Scales As Noted			

Drng. No.	CAD Ref	Plot	Rev
Option 1			P1



Main A64 Site Access (Option 2)
 Grade-Separated Junction (TD22/06)
 9.3m Single C/Way Access Road
 Potential Conflict with OS10

Lawrence Walker Ltd
Church Farm
Leamington Hastings
Warks CV23 8DZ

Key
 — Adopted Highways (A64 Principle Access)

Project
Allocation ST15

Title
A64 Site Access
TD22/06 Compliant Scheme






















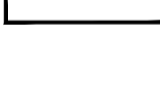
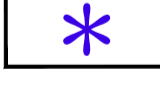
Drn. SPJ	Chkd.	App.	Date 19/03/18
Scales As Noted			

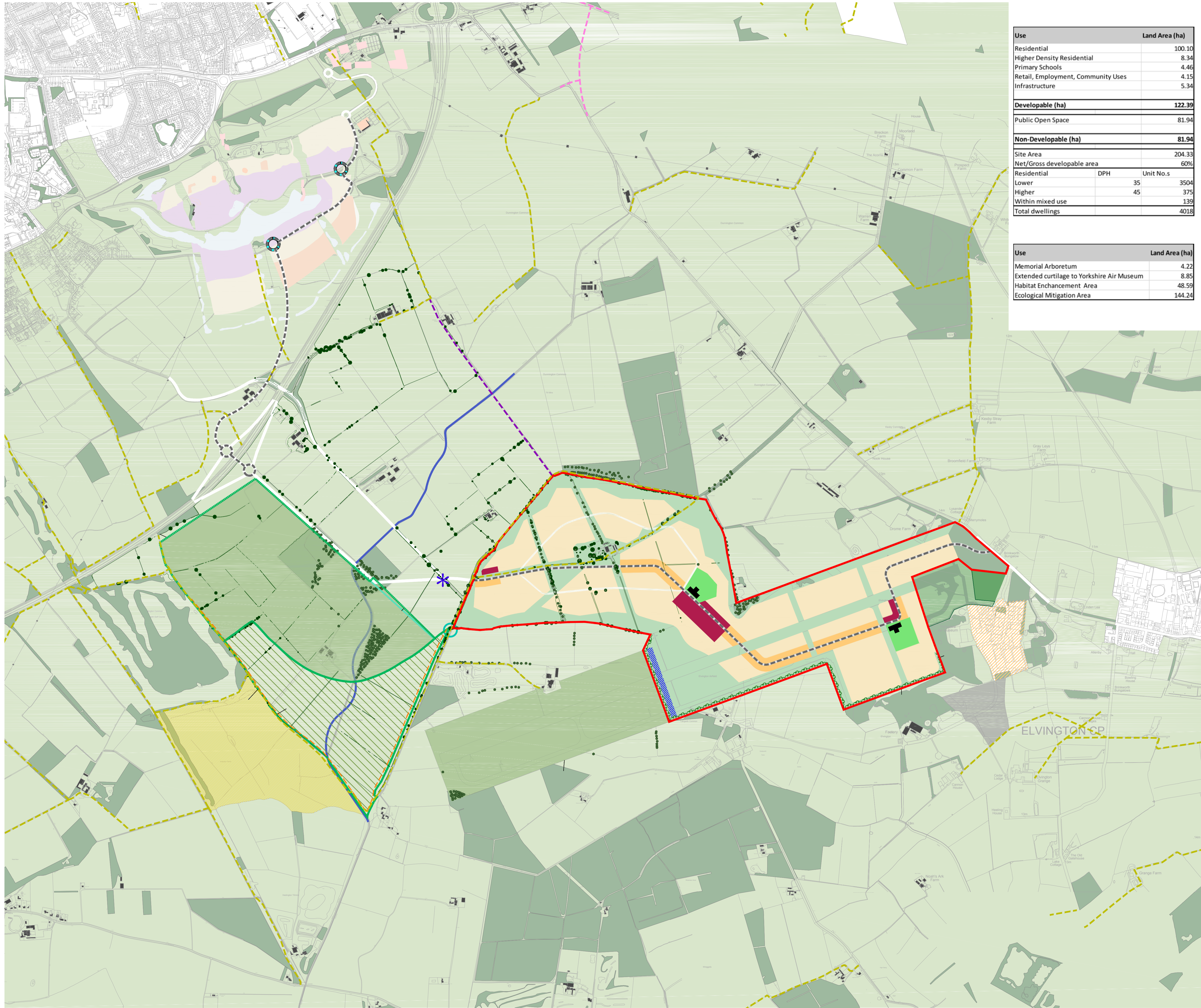
Drg. No.	CAD Ref	Plot	Rev
Option 2			P1

Appendix D
The Langwith Masterplan

Use	Land Area (ha)	
Residential	100.10	
Higher Density Residential	8.34	
Primary Schools	4.46	
Retail, Employment, Community Uses	4.15	
Infrastructure	5.34	
Developable (ha)	122.39	
Public Open Space	81.94	
Non-Developable (ha)	81.94	
Site Area	204.33	
Net/Gross developable area	60%	
Residential	DPH	Unit No.s
Lower	35	3504
Higher	45	375
Within mixed use		139
Total dwellings		4018

Use	Land Area (ha)
Memorial Arboretum	4.22
Extended curtilage to Yorkshire Air Museum	8.85
Habitat Enhancement Area	48.59
Ecological Mitigation Area	144.24

-  Allocation Site Boundary
-  Residential
-  Higher Density Residential
-  Public Open Space
-  Primary Schools
-  Retail, Employment, Community Uses
-  Commercial use with limited Retail
-  Memorial Arboretum
-  Extended curtilage to Yorkshire Air Museum
-  Primary Infrastructure
-  Existing Business Park
-  Proposed Elvington Business Park
-  Habitat Enhancement Area
-  Ecological Mitigation Area
-  Strategic Pedestrian / Cycle connections
-  Improved connectivity and opportunities for access to the University, Employment Quarters and wider established network of footpaths, including Minster Way.
-  Tillmire Drain
-  Heslington Tillmire SSSI
-  Bus routes
-  Gated Access to Langwith Stray (prevents vehicular access to SSSI)
-  Water feature buffer
-  The Link Road will pass under Common Lane via a new Subway, thereby preventing any access to Heslington by Langwith traffic
-  Vehicular movements between Long Lane and the new A64 Link Road will be controlled by the physical design of the junction, thereby preventing any access to Heslington by Langwith traffic



Project
Langwith Garden Village

Drawing Title
Concept Masterplan

Date	Scale	Drawn by	Check by
18.10.17	1:10,000@A1	PT	GR
Project No	Drawing No	Revision	
23190	9610	S	

BARTON WILLMORE

Planning • Master Planning & Urban Design • Architecture •
 Landscape Planning & Design • Environmental Planning • Graphic
 Communication • Public Engagement • Development Economics

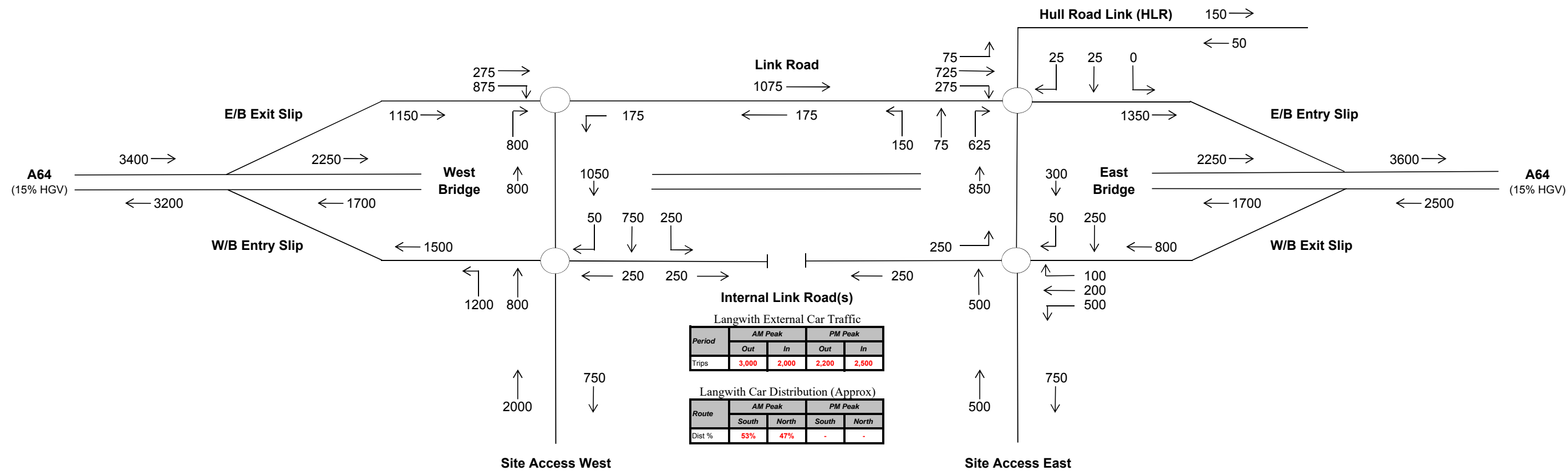
bartonwillmore.co.uk

Offices at Birmingham Bristol Cambridge Cardiff Ebbw Vale Edinburgh
 Leeds London Manchester Newcastle Reading Southampton

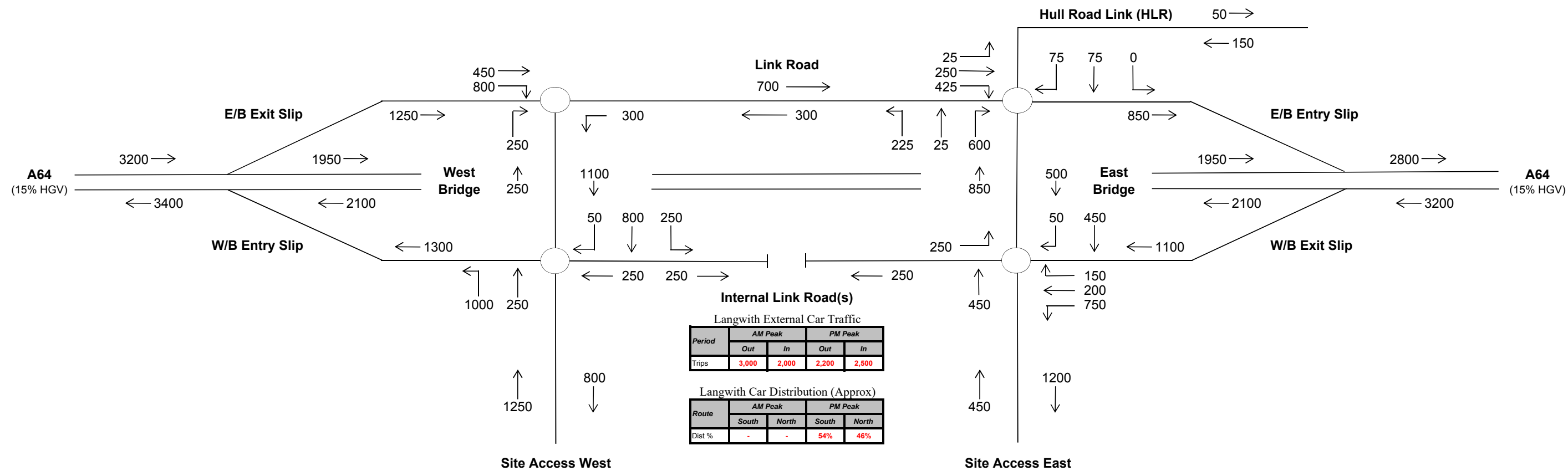
Appendix E

A64 Traffic Flow Predictions

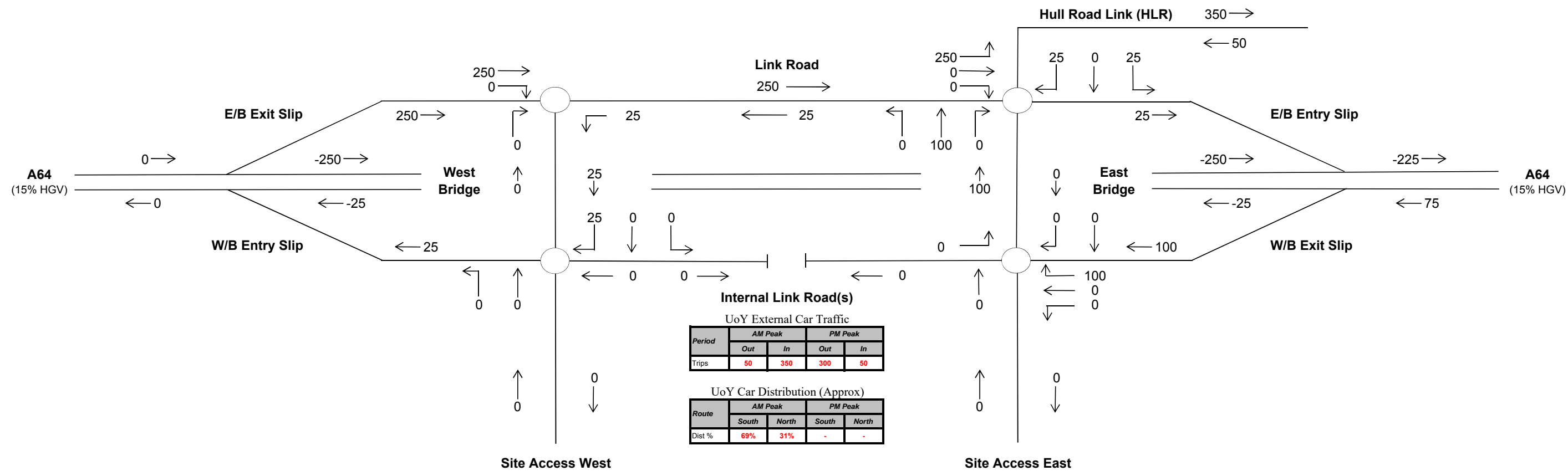
LANGWITH
DEVELOPMENT TRAFFIC WITH HULL ROAD LINK
AM PEAK HOUR (PCUs)



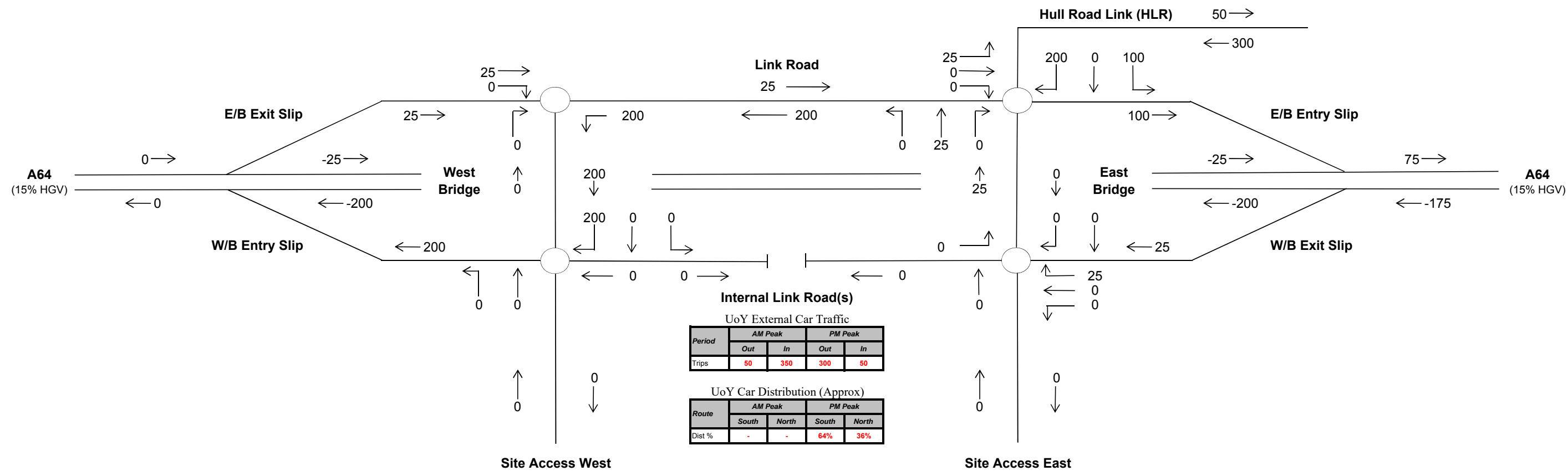
LANGWITH
DEVELOPMENT TRAFFIC WITH HULL ROAD LINK
PM PEAK HOUR (PCUs)



LANGWITH
UNIVERSITY OF YORK TAFFIC WITH HULL ROAD LINK
AM PEAK HOUR (PCUs)



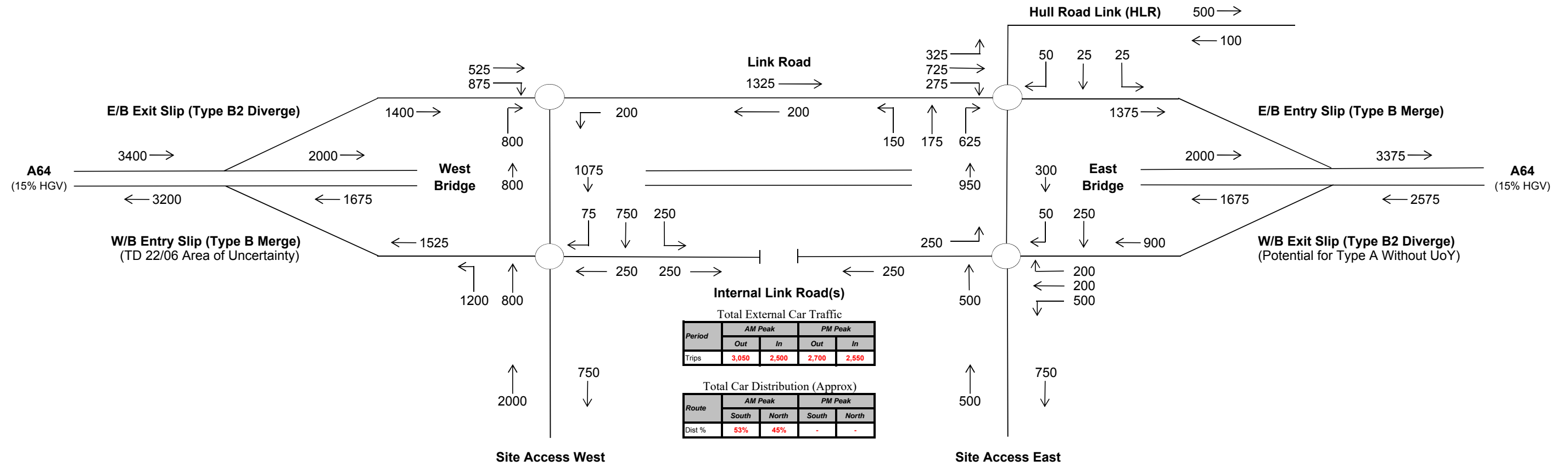
LANGWITH
UNIVERSITY OF YORK TAFFIC WITH HULL ROAD LINK
PM PEAK HOUR (PCUs)



LANGWITH

TOTAL DEVELOPMENT TRAFFIC WITH HULL ROAD LINK

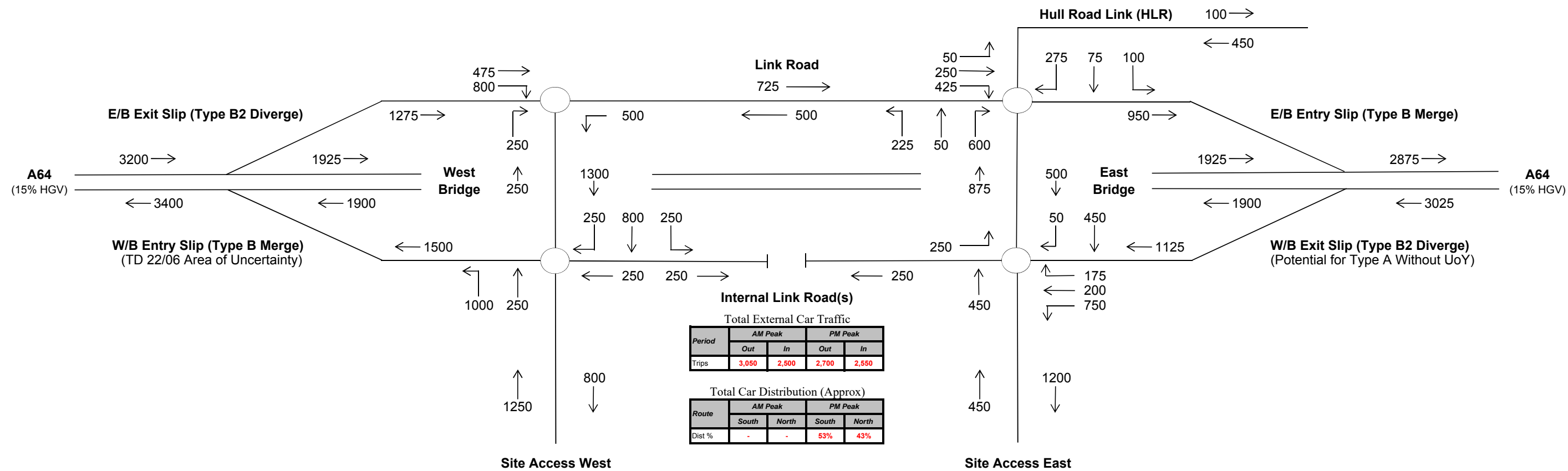
AM PEAK HOUR (PCUs)



LANGWITH

TOTAL DEVELOPMENT TRAFFIC WITH HULL ROAD LINK

PM PEAK HOUR (PCUs)



Site Access Assignments.

Dist From Co/C Model (Back of Supply Report)

- 56% A64 (S)
- 25% A64 (N)
- 13% Hull Road
- 2% A166
- 4% A1079 (E)

Traffic = 0.41 AM arrivals
 0.15 AM ↓ arrivals
 0.23 PM arrivals
 0.35 PM ↓ arrivals

} From Supply Report

AM PEAK & PM FLOW

	<u>ALL ACCESS (4000 UNITS)</u>		<u>A1079 ACCESS (1000 UNITS)</u>	
	OUT	IN	OUT	IN
* AM PEAK				
A64 (S)	900	300	225	100
A64 (N)	250	150	100	50
Hull Road	200 - 150 day	75 - 50	50	25
A166	50	25	-	-
* A1079 (E)	100 (1600)	50 (750)	25 (400)	25 (200)
* PM PEAK				
A64 (S)	900	800	150	200
A64 (N)	200	300	50	75
Hull Road	125 - 50	200 - 150	25	50
A166	25	25	-	-
* A1079 (E)	50 (900)	75 (1400)	25 (200)	25 (300)

**Allocation ST15
Grimston Bar Interchange (A64)
Surveyed Flows & TEMPRO Growth Assignment (PCU's)**

Grimston Bar Interchange - Surveyed Turning Counts & TRADS (June 19th 2014)

AM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	195	86	216	91	230
A64 (N)	324	-	72	259	77	1056
A166	249	152	-	25	10	277
Hull Rd (E) (A1079)	444	362	25	-	10	328
Elvington Lane	299	46	10	10	-	102
A64 (S)	534	1444	156	433	97	-
	1850	2199	349	943	285	1993

Totals (From)

818

1788

713

1169

467

2664

7619

Total

5119

Via Roundabout

Totals

5112

Via Roundabout

Grimston Bar Interchange - Surveyed Turning Counts & TRADS (June 19th 2014)

PM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	232	204	313	129	418
A64 (N)	171	-	60	412	85	1542
A166	114	110	-	25	10	225
Hull Rd (E) (A1079)	246	302	25	-	10	570
Elvington Lane	129	85	10	10	-	98
A64 (S)	253	1056	263	542	61	-
	913	1785	562	1302	295	2853

Totals (From)

1296

2270

484

1153

332

2175

7710

Total

Grimston Bar Interchange - Reference Case (2031)

AM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	248	109	274	116	292
A64 (N)	426	-	91	329	95	1341
A166	327	193	-	31	12	352
Hull Rd (E) (A1079)	584	460	31	-	12	417
Elvington Lane	393	57	12	12	-	130
A64 (S)	702	1834	198	550	123	-
	2433	2791		1996		2531

Totals (From)

1039

2282

915

1503

604

3407

9751

Total

Applied Growth

27.0%

27.6%

28.4%

28.6%

29.3%

27.9%

6576

Via Roundabout

Assumes No A1237 Dualling

42.7%

26.9%

26.7%

26.9%

25.7%

27.0%

6685

Via Roundabout

Applied Growth

27.0%

26.9%

26.7%

26.9%

25.7%

27.0%

6685

Via Roundabout

Grimston Bar Interchange - Reference Case (2031)

PM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	331	291	447	184	596
A64 (N)	217	-	76	523	105	1958
A166	145	140	-	31	12	286
Hull Rd (E) (A1079)	312	384	31	-	12	724
Elvington Lane	164	105	12	12	-	124
A64 (S)	321	1341	334	688	77	-
	1160	2300		2836		3689

Totals (From)

1849

2880

613

1463

417

2762

9985

Total

Applied Growth

27.0%

28.9%

31.4%

29.3%

27.0%

1160

Applied Growth

27.0%

Applied Growth

31.5%

26.9%

26.6%

27.0%

Totals

Growth Factor

Applied Growth

27.0%

28.9%

31.4%

29.3%

**Allocation ST15
Grimston Bar Interchange (A64)
Development Turning Movements (PCU's)**

Grimston Bar Interchange Phase 1 - 1,000 Units

AM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	0	0	25	0	0
A64 (N)	0	-	0	50	0	0
A166	0	0	-	0	0	0
Hull Rd (E) (A1079)	50	100	0	-	0	225
Elvington Lane	0	0	0	0	-	0
A64 (S)	0	0	0	100	0	-
	50	100	0	200	0	225
				25 via East		

Totals (From)		Assumes 56% A64 (S)		Totals (From)
25		13%		50
50		25%		75
0		2%		0
400	25 via East	4%	25 via East	250
0		N/A		0
100				200
600				600
Total				Total

Grimston Bar Interchange Phase 1 - 1,000 Units

PM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	0	0	50	0	0
A64 (N)	0	-	0	75	0	0
A166	0	0	-	0	0	0
Hull Rd (E) (A1079)	25	50	0	-	0	150
Elvington Lane	0	0	0	0	0	0
A64 (S)	0	0	0	200	0	-
	25	50	0	350	0	150
				25 via East		

Grimston Bar Interchange Phase 2 - 5,000 Units

AM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	-25	0	-25	0	25
A64 (N)	-75	-	0	0	0	250
A166	-25	0	-	0	0	50
Hull Rd (E) (A1079)	-50	0	0	-	0	100
Elvington Lane	0	0	0	0	-	0
A64 (S)	-100	525	50	125	0	-
	-100	500	50	100	0	475
	150 UoY Elec			50 UoY Elec		

Totals (From)		Assumes 56% A64 (S)		Totals (From)
25	50 UoY Elec	13%	150 UoY Elec	-50
175		25%		450
25		2%		25
50		4%		75
0		N/A		0
750	150 UoY Elec		50 UoY Elec	650
1025				1150
Total		Totals		Total

Grimston Bar Interchange Phase 2 - 5,000 Units

PM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	-75	-25	-50	0	-50
A64 (N)	-25	-	0	0	0	475
A166	0	0	-	0	0	25
Hull Rd (E) (A1079)	-25	0	0	-	0	100
Elvington Lane	0	0	0	0	-	0
A64 (S)	75	375	50	100	0	-
	75	300	25	50	0	700
	50 UoY Elec					150 UoY Elec

**Allocation ST15
Grimston Bar Interchange (A64)
Stage 1 Development Design Flows (PCU's)**

Grimston Bar Interchange - Stage 1 Assignments (PCU's - 1,000 Units @ 2023)

PM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	223	98	272	104	263
A64 (N)	378	-	82	346	86	1207
A166	291	174	-	28	11	317
Hull Rd (E) (A1079)	568	514	28	-	11	600
Elvington Lane	349	52	11	11	-	117
A64 (S)	623	1650	178	595	111	-
	2209	2612	398	1252	324	2503

Totals
(From)

960

2100

820

1721

539

3158

9298

Total

6440
Via
Roundabout

Totals

6495
Via
Roundabout

Grimston Bar Interchange - Stage 1 Assignments (PCU's - 1,000 Units @ 2023)

PM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	284	250	434	158	512
A64 (N)	195	-	69	546	95	1762
A166	130	126	-	28	11	257
Hull Rd (E) (A1079)	306	395	28	-	11	801
Elvington Lane	147	95	11	11	-	112
A64 (S)	289	1207	301	819	70	-
	1069	2108	659	1838	346	3446

Totals
(From)

1639

2668

552

1542

377

2686

9464

Total

Grimston Bar Interchange - Stage 1 Design Turning Movements (PCU's - 1,000 Units @ 2023)

AM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	250	100	400	0	300
A64 (N)	400	-	100	450	0	1200
A166	300	200	-	50	0	350
Hull Rd (E) (A1079)	900	600	50	-	0	750
Elvington Lane	0	0	0	0	-	0
A64 (S)	650	1650	200	700	0	-
	2250	2700	450	1600	0	2600

Totals
(From)

1050

2150

900

2300

0

3200

9600

Total

6750
Via
Roundabout

Totals

6700
Via
Roundabout

Grimston Bar Interchange - Stage 1 Design Turning Movements (PCU's - 1,000 Units @ 2023)

PM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	300	250	600	0	500
A64 (N)	200	-	100	650	0	1800
A166	150	150	-	50	0	250
Hull Rd (E) (A1079)	450	500	50	-	0	1000
Elvington Lane	0	0	0	0	-	0
A64 (S)	300	1200	300	900	0	-
	1100	2150	700	2200	0	3550

Totals
(From)

1650

2750

600

2000

0

2700

9700

Total

**Allocation ST15
Grimston Bar Interchange (A64)
Stage 2 Development Design Flows (PCU's)**

Grimston Bar Interchange - Stage 2 Assignments (PCU's - 5,000 Units @ 2031)

PM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	223	109	249	116	317
A64 (N)	351	-	91	329	95	1591
A166	302	193	-	31	12	402
Hull Rd (E) (A1079)	534	460	31	-	12	517
Elvington Lane	393	57	12	12	-	130
A64 (S)	602	2359	248	675	123	-
	2183	3291	492	1296	358	2956

Totals (From)

1014

2457

940

1553

604

4007

10576

Total

6626
Via
Roundabout

Totals

6585

Via
Roundabout

Totals (From)

1649

3330

638

1538

417

3362

10935

Total

Grimston Bar Interchange - Stage 2 Assignments (PCU's - 5,000 Units @ 2031)

PM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	256	266	397	184	546
A64 (N)	192	-	76	523	105	2433
A166	145	140	-	31	12	311
Hull Rd (E) (A1079)	287	384	31	-	12	824
Elvington Lane	164	105	12	12	-	124
A64 (S)	396	1716	384	788	77	-
	1185	2600	769	1751	391	4239

Totals (From)

1649

3330

638

1538

417

3362

10935

Total

1185 2600 769 1751 391 4239

Total

Grimston Bar Interchange - Stage 2 Design Turning Movements (PCU's - 5,000 Units @ 2031)

AM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	300	100	400	0	300
A64 (N)	400	-	200	400	0	1600
A166	300	300	-	Bore Tree Baulk	0	300
Hull Rd (E) (A1079)	750	750	Bore Tree Baulk	-	0	800
Elvington Lane	0	0	0	0	-	0
A64 (S)	600	2400	200	600	0	-
	2050	3750	500	1400	0	3000

Totals (From)

1100

2600

900

2300

0

3800

10700

Total

6700
Via
Roundabout

Totals

6400

Via
Roundabout

Totals (From)

1800

3250

600

1800

0

3350

10800

Total

Grimston Bar Interchange - Stage 2 Design Turning Movements (PCU's - 5,000 Units @ 2031)

PM Peak						
From/To	Hull Rd (W) (A1079)	A6N (N)	A166	Hull Rd (E) (A1079)	Elvington Lane	A64 (S)
Hull Rd (W) (A1079)	-	200	400	600	0	600
A64 (N)	200	-	0	600	0	2450
A166	150	150	-	Bore Tree Baulk	0	300
Hull Rd (E) (A1079)	500	500	Bore Tree Baulk	-	0	800
Elvington Lane	0	0	0	0	-	0
A64 (S)	400	1750	400	800	0	-
	1250	2600	800	2000	0	4150

Totals (From)

1800

3250

600

1800

0

3350

10800

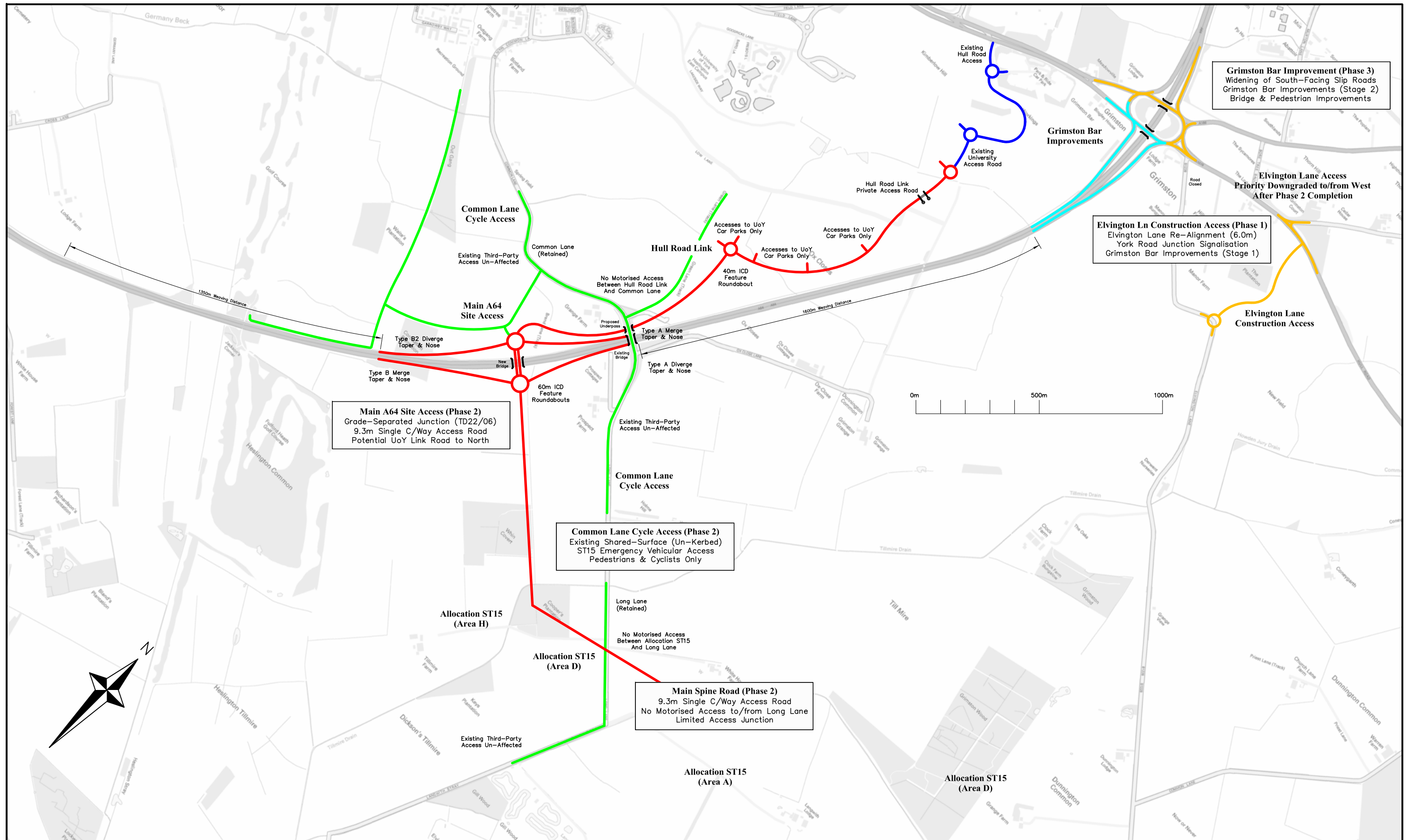
Total

1250 2600 800 2000 0 4150

Total

Appendix F

The Langwith Transport Strategy



Grimston Bar Improvement (Phase 3)
 Widening of South-Facing Slip Roads
 Grimston Bar Improvements (Stage 2)
 Bridge & Pedestrian Improvements

Elvington Lane Access
 Priority Downgraded to/from West
 After Phase 2 Completion

Elvington Ln Construction Access (Phase 1)
 Elvington Lane Re-Alignment (6.0m)
 York Road Junction Signalisation
 Grimston Bar Improvements (Stage 1)

Main A64 Site Access (Phase 2)
 Grade-Separated Junction (TD22/06)
 9.3m Single C/Way Access Road
 Potential UoY Link Road to North

Common Lane Cycle Access (Phase 2)
 Existing Shared-Surface (Un-Kerbed)
 ST15 Emergency Vehicular Access
 Pedestrians & Cyclists Only

Main Spine Road (Phase 2)
 9.3m Single C/Way Access Road
 No Motorised Access to/from Long Lane
 Limited Access Junction

Lawrence Walker Ltd
Church Farm
Leamington Hastings
Warks CV23 8DZ

- Key**
- Adopted Highways or Bridleways (Principle Cycle Accesses)
 - Phase 1 Construction Access (Downgraded after Completion of Phase 2 Works as Noted)
 - Phase 2 Site Access (Main A64 Site Access & Hull Road Link)
 - Phase 3 Highway Improvements (Grimston Bar Interchange)
 - + Private Link Road for UoY Traffic (Also Route 8 Bus Link via Transponder Control & Adopted Bridleway)

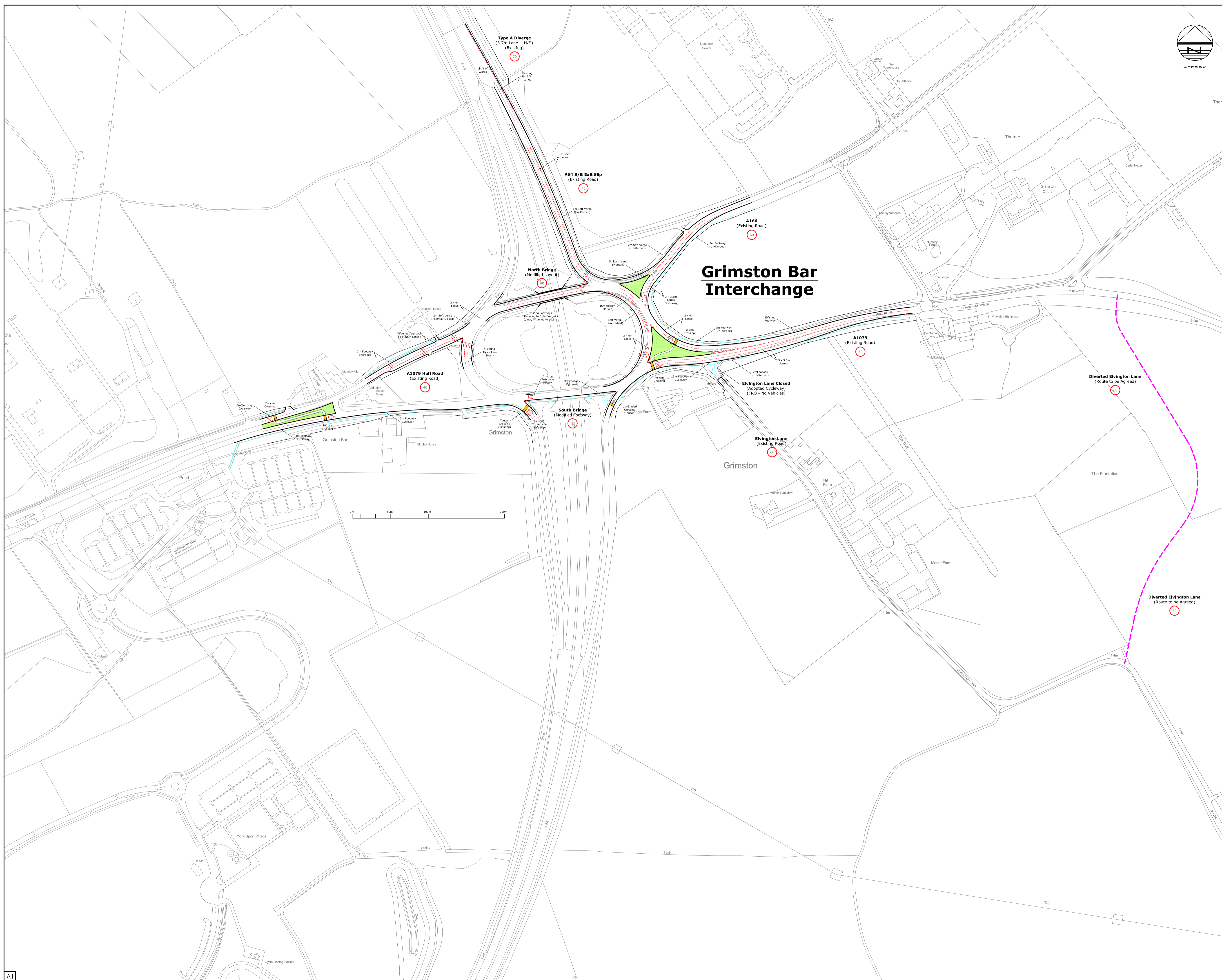
Note all Accesses to be Designed to Accommodate All-Purpose Movements in an Emergency and also Emergency Vehicles as and when Required.

Project
Allocation ST15
Sandby Ltd & Oakgate

Drn. SPJ	Chkd.	App.	Date 05/12/16
Scales As Noted			

Title
Transport Strategy
Indicative Site Access

Drng. No.	CAD Ref	Plot	Rev
Figure 1			P31



- NOTES**
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KEY

Rev	Date	Description	Drawn
D3	17.08.16	TWO PHASE LAYOUT DEVELOPED	SPJ
D2	28.02.16	ELVINGTON LANE CLOSED	SPJ
DT	22.01.16	ISSUED FOR USE	SPJ

AMENDMENTS

LAWRENCE WALKER LIMITED
 CHURCH FARM
 LEAMINGTON
 HASTINGS
 WARCS
 CV23 8DZ

Client

SANDBY LIMITED
 OAKGATE PLC

Project Title

LANGWITH
 (ALLOCATION ST15)

Drawing Title

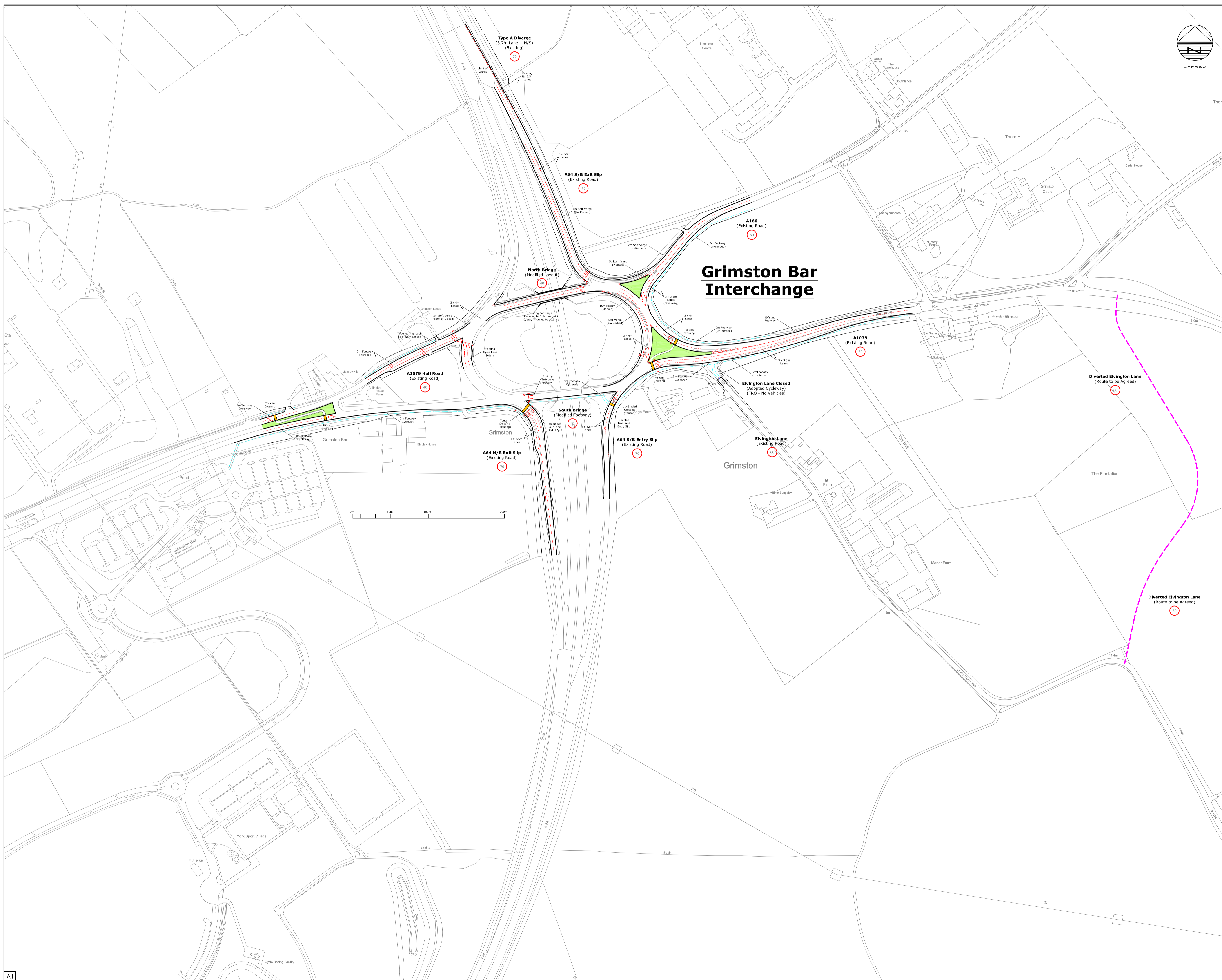
A64
 HIGHWAYS WORKS
 (Stage 1)

Scale	Date	Drawn by
As Noted	22.01.16	SPJ

Drawing Status

Draft Local Plan

Drawing No:	Revision
LWL/670/004	D3



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LAWRENCE WALKER LIMITED
 CHURCH FARM
 LEAMINGTON
 HASTINGS
 WARCS
 CV23 8DZ

Client

SANDBY LIMITED
 OAKGATE PLC

Project Title

LANGWITH
 (ALLOCATION ST15)

Drawing Title

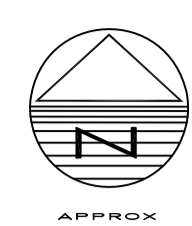
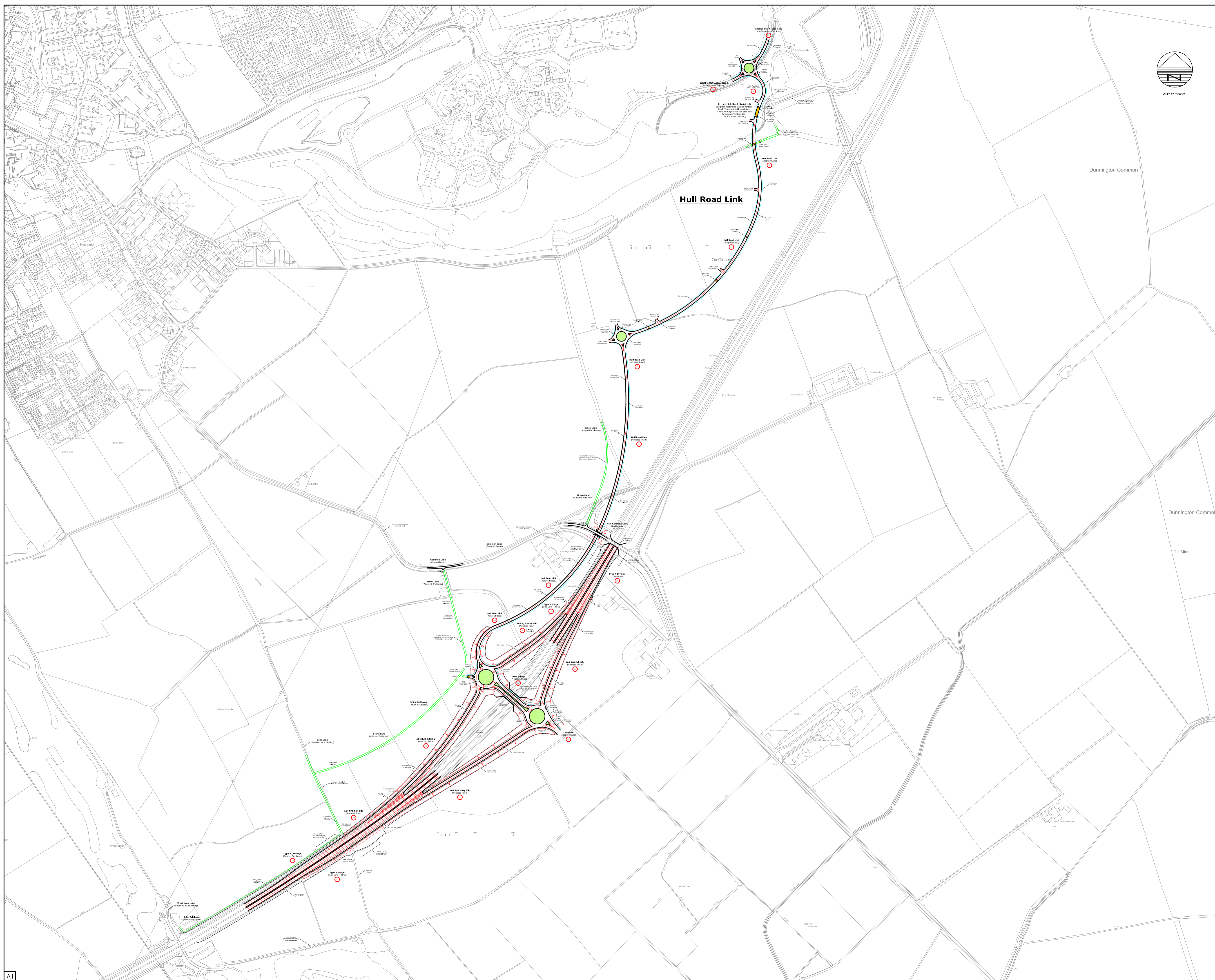
A64
 HIGHWAYS WORKS
 (Stage 2)

Scale	Date	Drawn by
As Noted	22.01.16	SPJ

Drawing Status

Draft Local Plan

Drawing No:	Revision
LWL/670/005	D3



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Rev	Date	Description	Drawn
D3	18.11.16	LAYOUT REVISED	SPJ
D2	17.08.16	SLIP ROADS AMENDED	SPJ
DT	22.01.16	ISSUED FOR USE	SPJ

AMENDMENTS

LAWRENCE WALKER LIMITED
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 HASTINGS
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 CV23 8DZ

Client
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 OAKGATE PLC

Project Title
 LANGWITH
 (ALLOCATION ST15)

Drawing Title
**A64 SITE ACCESS
 GENERAL
 ARRANGEMENT
 (Sheet 1 of 3)**

Scale As Noted	Date 22.01.16	Drawn by SPJ
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Drawing Status
 Draft Local Plan

Drawing No: LWL/670/001	Revision D3
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KEY

Rev	Date	Description	Drawn
D3	18.11.16	LAYOUT REVISED	SPJ
D2	17.08.16	SLIP ROADS AMENDED	SPJ
DT	22.01.16	ISSUED FOR USE	SPJ

AMENDMENTS

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LIMITED
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LEAMINGTON
HASTINGS
WARCS
CV23 8DZ

Client

SANDBY
LIMITED

Project Title

LANGWITH
(ALLOCATION ST15)

Drawing Title

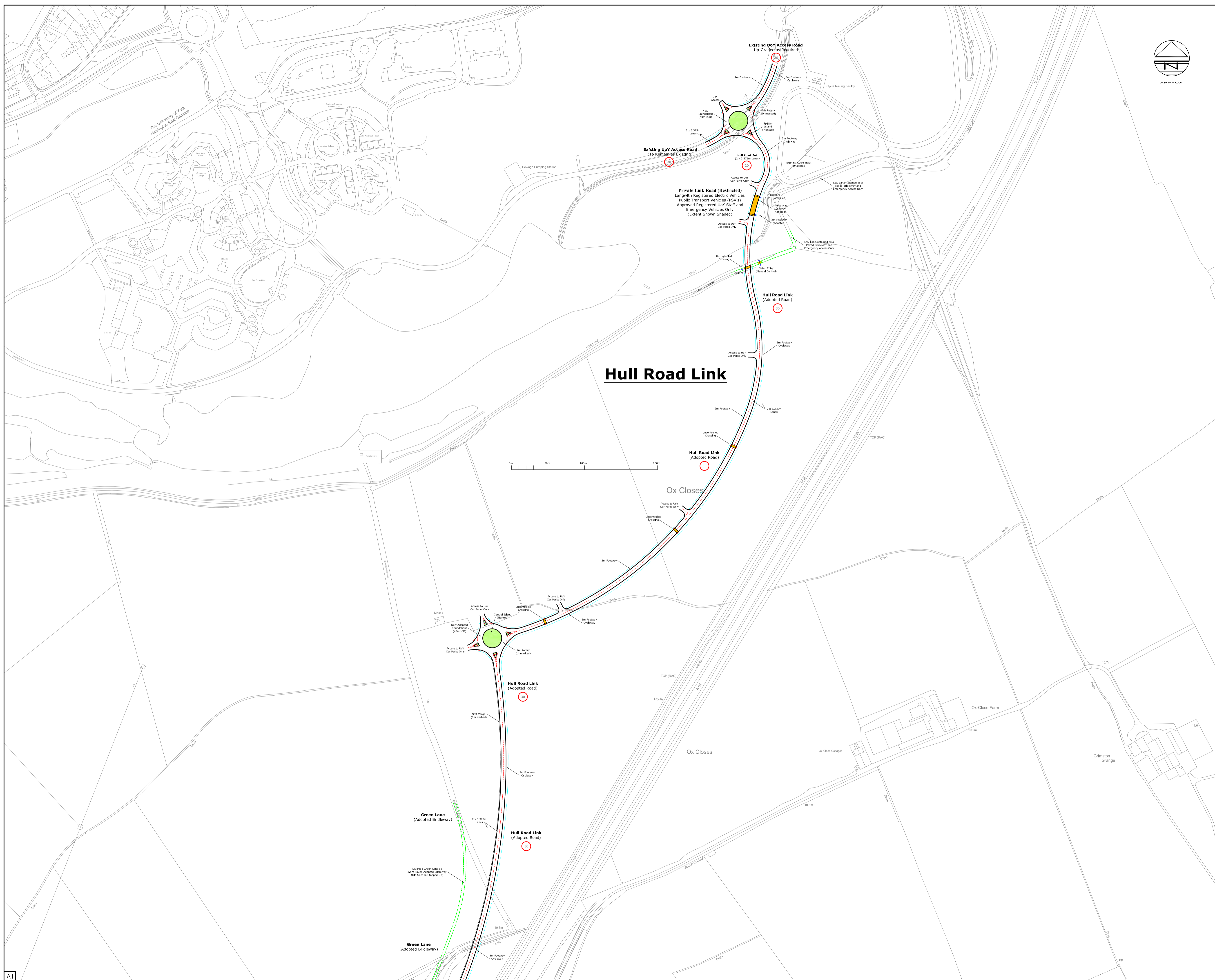
**A64 SITE ACCESS
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ARRANGEMENT
(Sheet 2 of 3)**

Scale	Date	Drawn by
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Drawing Status

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Drawing No:	Revision
LWL/670/002	D3



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KEY

Rev	Date	Description	Drawn
D3	18.11.16	LAYOUT REVISED	SPJ
D2	17.08.16	SLIP ROADS AMENDED	SPJ
D1	22.01.16	ISSUED FOR USE	SPJ

AMENDMENTS

LAWRENCE WALKER LIMITED
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 LEAMINGTON
 HASTINGS
 WARCS
 CV23 8DZ

Client
 SANDBY LIMITED

Project Title
 LANGWITH
 (ALLOCATION ST15)

Drawing Title
**A64 SITE ACCESS
 GENERAL
 ARRANGEMENT
 (Sheet 3 of 3)**

Scale As Noted	Date 22.01.16	Drawn by SPJ
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Drawing Status
 Draft Local Plan

Drawing No: LWL/670/003	Revision D3
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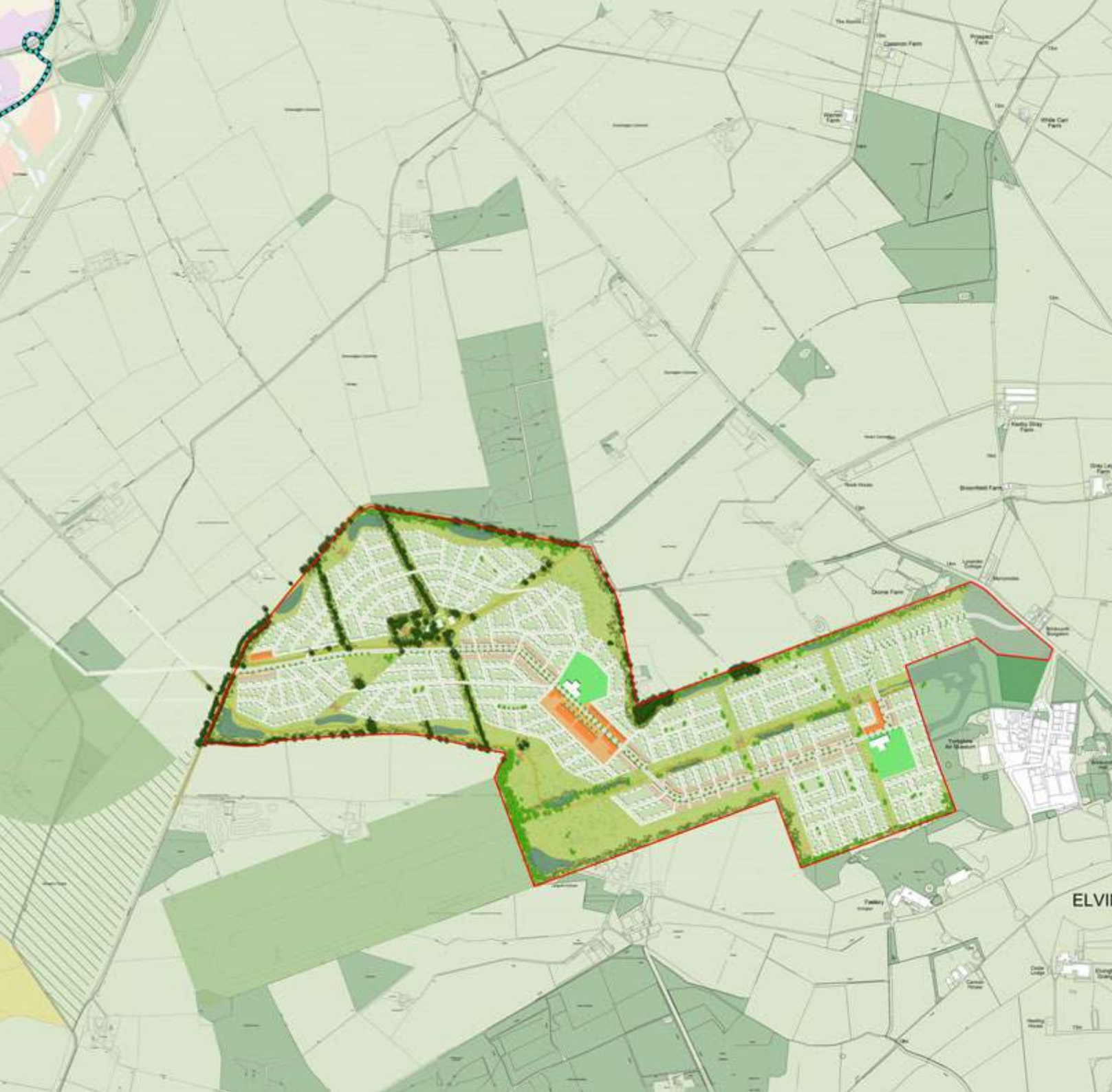


APPENDIX 4

MASTERPLAN AND VISIONING DOCUMENT



**BARTON
WILLMORE**



Langwith Garden Village

Masterplanning and
Place-Making Vision
April 2018

Barton Willmore / 101 Victoria Street
Bristol BS1 6PU / tel: 0117 929 9677
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Date: 04.04.2018 / Status: Final / Rev: 17

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Movement Strategy	20
Green Infrastructure	22
Conclusion	24
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Introduction

This document presents a masterplan and vision on behalf of Sandby (York) Ltd & Oakgate/Caddick Group for the delivery of a new Garden Village of the highest quality in support of the proposed allocation ST15 (Reg 19, 2018) for a new sustainable settlement. The proposals set out in this document have been updated from the original representations submitted in October 2017 to address specific comments raised during the most recent consultation period. The key changes are set out below:

- » The removal of proposed residential development in the north west part of the site in order to minimise any perceived potential visual impact on views from the A64
- » The re-location of the westernmost primary school to within the core area of the site
- » The re-location of the westernmost neighbourhood centre to the entrance of the site to create a strong gateway
- » An expansion of the area provided for the extension to the Air Museum to meet the museum's requirements
- » The creation of an arboretum adjacent to the Air Museum
- » The creation of a strong landscape buffer at the eastern end of the site, to buffer the settlement.

In its recent prospectus, **“Locally-led Garden Villages, Towns and Cities”** the Government define a Garden Village as being between 1,500 and 10,000 homes. Our proposals have been positively prepared to seek the highest quality new Garden Village that is able to deliver approx. 4,000 new homes at Langwith (Reg 19, 2018).

Both URBED and Barton Willmore were shortlisted for the 2014 Wolfson Economics prize for their answers to the question “How would you deliver a new Garden City which is visionary, economically viable, and popular?”

URBED’s winning submission was based on the idea of expanding the fictional city of Uxcester. Langwith Garden Village is a major opportunity to put the principles developed by both companies through the prize into practice.

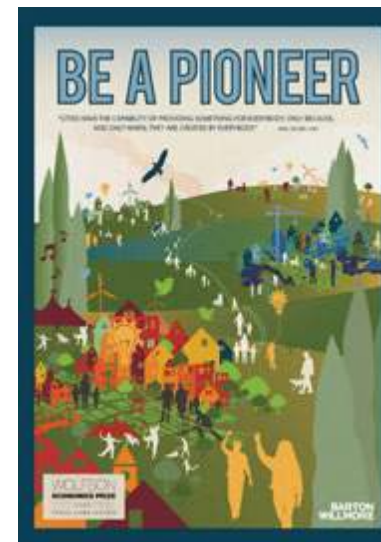
URBED suggested that we should be expanding existing, popular smaller cities. These were places with strong demand for housing and a limited supply of brownfield land. The only option for expansion was to build outwards. The proposal was based on the fictional city of Uxcester although this in turn was based on York. The Snowflake Diagram (on the page opposite) showed how the city could be expanded within a 10km ring of the centre with a series of new sustainable neighbourhoods based on the maximum of a 10 minute walk to a public transport node.

In the case of Uxcester we showed how we could double the size of the city over a 30

or 40 year period. The scale of what is being proposed in York is not quite on this scale. Nevertheless Langwith Garden Village is an opportunity to put into practice many of the same principles.

Prime amongst these is the idea of the ‘confident bite’. After brownfield land, the most sustainable place to develop is within the 10km circle around the city. Development in this area will be linked to the existing city centre supporting local services and making use of existing schools and facilities where practical and appropriate. It will also be the most practical area to serve with

public transport. This area may be the most sustainable place to build, but it is also the most closely guarded through green belt policy. One of the key principles of URBED’s Wolfson Essay was the idea of taking a confident bite out of the green belt rather than nibbling around its edge. A confident bite can be developed more sustainably and take pressure off other peripheral areas and villages. Langwith Garden Village is just such a ‘confident bite’ and the landowners are committed to making it an exemplar garden village, which is one of the Council’s requirements in their emerging Local Plan.



Barton Willmore’s Shortlisted Submission



URBED’s Winning Submission to the Wolfson Prize. Langwith is likely to be an award-winning development.

Indeed, there has been an acceptance through the emerging Local Plan that a new settlement in this broad location is acceptable in principle, and can help meet York's objectively assessed housing need.

Furthermore, the City of York Council have recognised the planning merits of a new settlement in this location and put ST15 (Reg 19, 2018) forward as an expression of interest for a Garden Village under the CLG's invitation in July 2016.

Barton Willmore's shortlisted submission to the Wolfson Economics Prize set out a 'route map' for the practical delivery of a new generation of Garden Cities of various scales and typologies.

The Barton Willmore submission set out a bold vision to deliver Garden Cities that are popular with the public, landowners, developers and residents. The model advocated a return to the creative process of evolving communities organically.

This document presents a vision and masterplan to deliver 'Langwith Garden Village' which will reflect the principles of Garden Cities from the strategic approach to the detailed design of spaces, places and buildings.

This document effectively demonstrates that a more sustainable allocation can be achieved at Langwith (Reg 19, 2018).

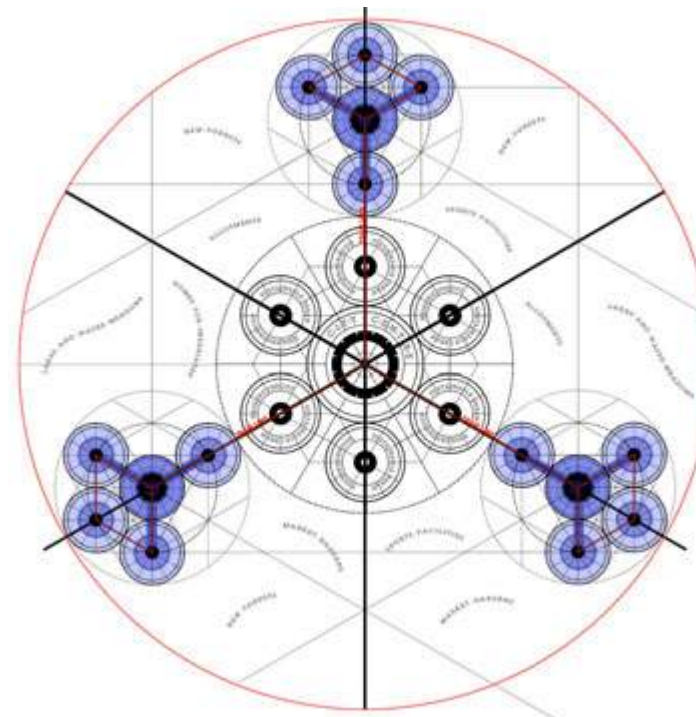
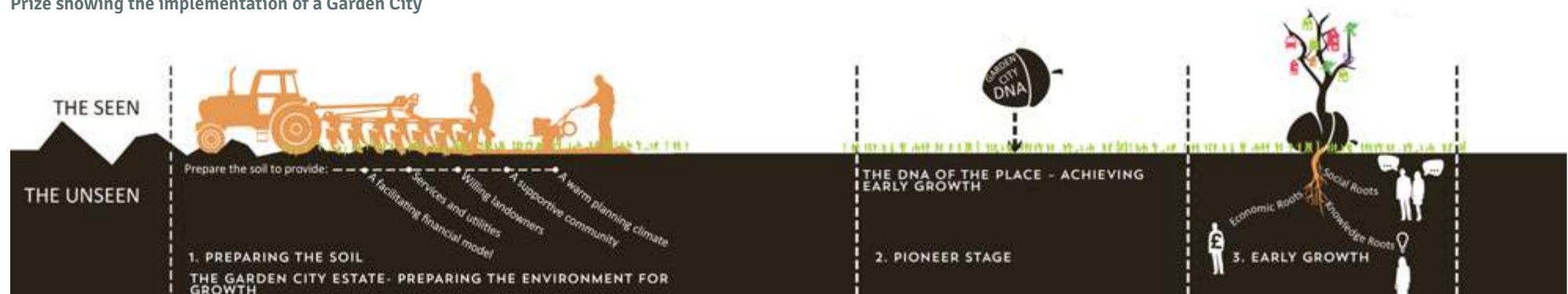


Diagram from URBED's winning submission to the Wolfson Economics Prize 2014

Diagram from Barton Willmore's shortlisted submission to the Wolfson Prize showing the implementation of a Garden City



The Vision

Langwith will be a beautiful, sustainable Garden Village of the highest quality providing for a balanced and mixed community, well-connected by sustainable transport modes to York city centre and responsive to its landscape setting.

Garden Village

- » Approximately 40% of land will be provided as accessible public open space
- » The settlement will reflect the distinctive character of local villages
- » Very high quality design of places, spaces and buildings
- » Walkable neighbourhoods with community hubs
- » Reflect existing pattern of York surrounded by villages

Balanced Community

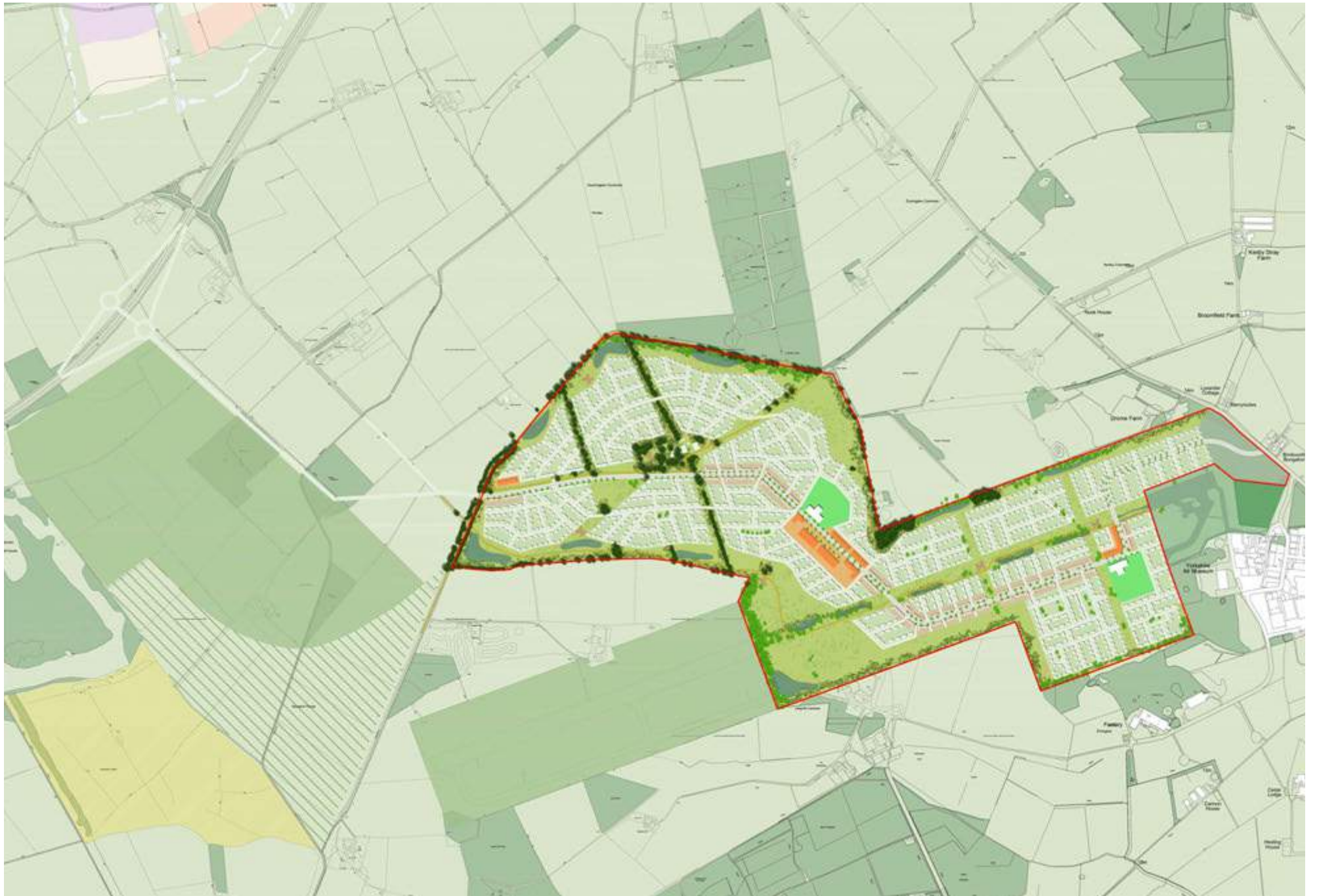
- » A sustainable mix of housing
- » An appropriate range of shops, services and community facilities
- » Deliver on-site education provision in community 'hubs'
- » A wide range of housing types and affordable homes
- » The provision of new offices and job opportunities

Landscape Led

- » Designed to sit comfortably in landscape
- » Incorporation of key views
- » Generous public green spaces and strategic network of Green Infrastructure and habitat creation
- » Comprehensive mitigation strategy for biodiversity
- » A 192ha nature reserve (which will be one of the largest in Yorkshire) will be established within the first phase of development. Our objective is to make this of national significance for nature conservation.

Sustainable Transport

- » Provide a high quality, frequent and accessible bus service to York and other service hubs
- » Connecting to existing pedestrian and cycle routes
- » Walkable neighbourhoods to encourage walking and bus use.



Illustrative Masterplan

The Strategic Opportunity

Langwith (Reg 19, 2018) provides an exciting, strategic opportunity to deliver a Garden Village of a sustainable scale that will complement and reinforce the existing settlement pattern around York which comprises a series of villages around the main urban area.

Reinforcement of the Green Belt

The strategic design concept responds sensitively to the setting of York and seeks to preserve and reinforce the purposes of the Green Belt surrounding the city during and beyond the plan period.

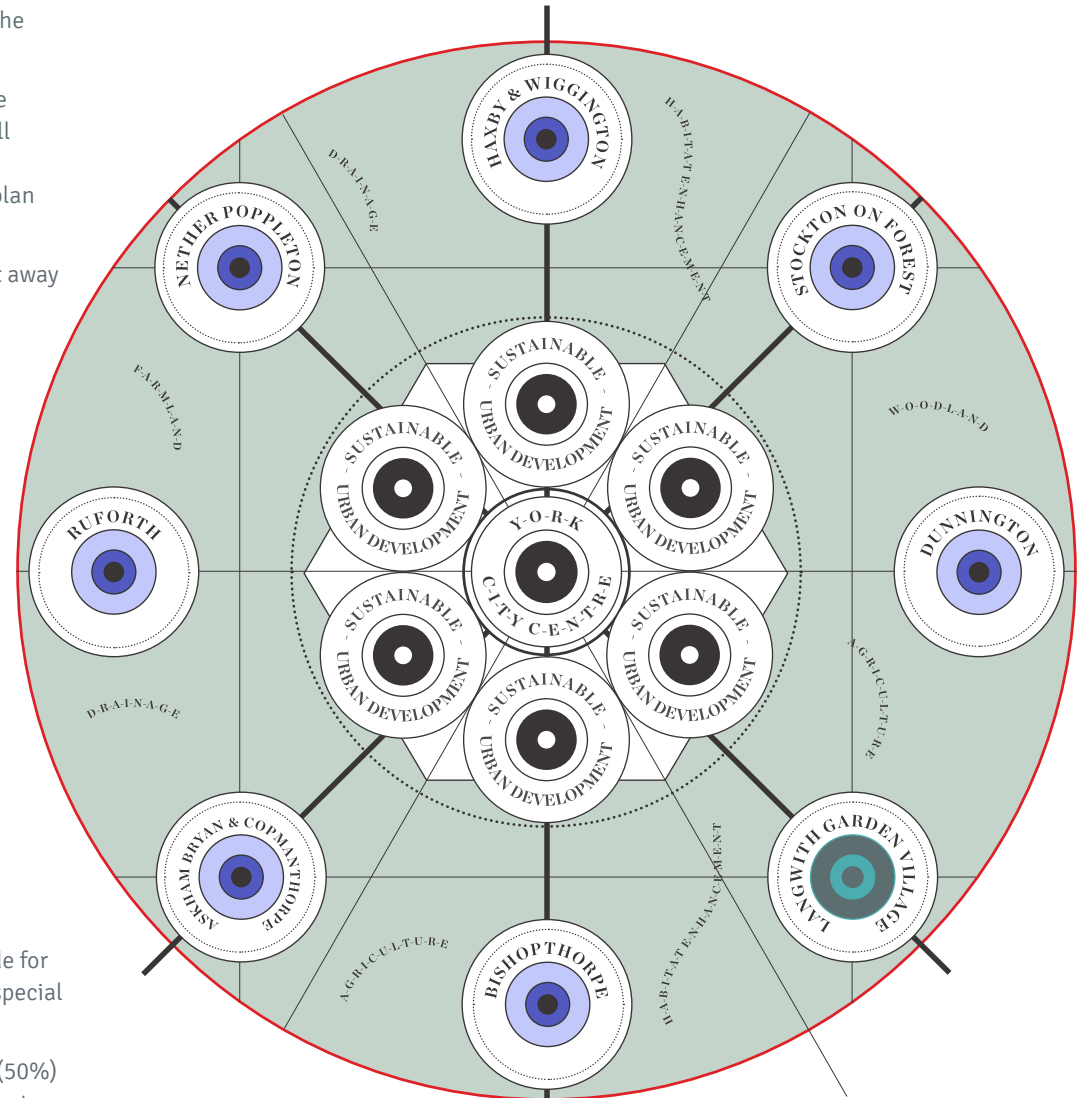
York has a distinctive settlement form comprising a compact city surrounded by rural villages. As a result, the Green Belt surrounding the main urban area is well-defined and has not been subjected to uncontrolled urban sprawl.

Both the 2013 'Preferred Options' and the 2014 'Further Sites Consultation' Local Plan considered a new settlement to the South East of York appropriate. Our revised design concept and masterplan (as well as the boundary put forward by the 2016 Local Plan) locates a new settlement further away from the A64 which will mean that the Green Belt immediately surrounding the City is even more protected. The landscape of this area is appropriate for a new settlement and the existing woodlands and other landscape features mean that the landscape can successfully assimilate a new settlement of the scale proposed. The masterplan sets a definitive and well-defined boundary which

will ensure the enduring protection of the Green Belt.

There is a strategic opportunity to create a new distinctive Garden Village that will respect, protect and reinforce the five purposes of the Green Belt beyond the plan period:

- » By locating the proposed settlement away from the immediate urban edge and by fixing well-defined and definitive boundaries to the new settlement, the design concept will prevent unrestricted sprawl
- » The proposed settlement is not in an area where the coalescence of settlements is a possibility. However, the well-defined and definitive boundaries will ensure that merging with any other village or settlement is not possible
- » The creation of this new Garden Village will be designed to sit sensitively and appropriately in the countryside and in this respect will safeguard the countryside from inappropriate encroachment
- » The proposed masterplan will provide for the preservation of the setting and special character of the historic City of York
- » A significant proportion of the land (50%) on which the proposed new settlement will sit is brownfield land and in this way the impact on the Green Belt is minimised.



This 'clockface' diagram illustrates how Langwith Garden Village will contribute to a balanced settlement pattern

Garden Village Charter

The land owners are committed to Langwith becoming a Garden Village linked to York and to this end we are suggesting that the following Garden Village Charter is signed up to by all parties. The Local Authority propose a new Garden Neighbourhood that is of a high quality design and is well connected to York City Centre and other service hubs. The LPA has submitted an Expression of Interest to the DCLG setting out a vision for the proposed Garden Village. This charter provides the framework for the realisation of this vision.

- 1. A Strong Neighbourhood:** The Garden Village will support a range of local shops, facilities and employment space so that it grows into a real place, rather than a housing estate.
- 2. Land Value Capture:** The development should fund its infrastructure from the value of the land including public transport links, schools, health facilities, junction improvements and green space.
- 3. Public Transport:** The scheme should be convenient by public transport from the city and provide direct bus connections to the University of York and the Park and Ride. The Garden Village will be designed not to be car dependent.

- 4. Generous Provision of Green Space:** For every one hectare developed the overall scheme would create over 1 hectare of green space (including public open space and new wildlife habitats which will be an asset and benefit to the whole City)
- 5. Sustainable Development:** It will set out clear and ambitious long-term goals for the energy performance, waste recycling, water usage.
- 6. Diversity of housing provision:** The scheme should create a framework for self-build, custom-build and small-scale builders alongside volume housebuilders.
- 7. Long term Management:** The developers will explore opportunities for long-term community controlled stewardship structures.



A sustainable community similar in quality to the Vauban and Rieselfeld neighbourhoods in Freiburg, Germany

The Importance of Scale

The Importance of Scale to Design Quality

The opportunity to deliver a new settlement that is truly sustainable and of the highest design quality is significantly enhanced with an increase in scale. The Town and Country Planning Association state that new Garden Cities provide the economies of scale to “innovate and create truly high quality places”. ST15 (Reg 19, 2018) proposes 3,339 dwellings but we believe that a new Garden Village of a similar scale to Haxby (which contains approximately 5,200 homes) would provide the necessary economy of scale to ensure the delivery of a new sustainable settlement that better reflects Garden City principles and is of the highest quality for the following reasons:

1. Deliverability of Key Services

A larger settlement of approximately 4,000 dwellings would provide sufficient critical mass in terms of the population to deliver and support important facilities and services, such as local shops, doctors surgery, community centres as well as primary schools.

Our concept provides for approximately 4,000 dwellings which would support a vibrant high street in the main village centre comprising a food store, other local shop, health centre, community centre and primary school. An additional neighbourhood centre comprising a primary

school and convenience shop would also be provided. The benefits are greater self-sufficiency and less reliance on the car as well as the creation of more vibrant walkable neighbourhoods with a sense of community.

A larger settlement of approx. 4,000 homes could potentially support the delivery of a GP surgery; an autonomous electric shuttle from Langwith to UoY; a community farm and Leisure and sports facilities.

2. A net gain in green space

Langwith (Reg 19, 2018) would result in a lower proportion of green field land (50% instead of 72% with ST15 (Reg 19, 2018)). In addition, the larger development would return a further 57ha of brownfield land to green space (in the form of an ecological area). Once completed, Langwith (Reg 19, 2018) would actually result in a total net increase of 13ha of ‘greenfield’ or green space, as set out in the tables on the opposite page. As proposed, the ST15 (Reg 19, 2018) allocation would result in a net loss of 55ha of ‘greenfield’ land after the proposed parks and other POS have been provided. Langwith (Reg 19, 2018) would result in the net loss of only 20ha of greenfield on the same basis. With the proposed restoration of the remaining 55ha of the airfield from brownfield to an ecological area, there is an overall net gain in greenfield/green space.

3. Patronage of public transport

The viability of a dedicated rapid bus connection between Langwith Garden Village and York City Centre depends on a sufficient number of potential passengers to support it. The Diagram on the opposite page illustrates how a larger, linear form of development would result in a higher proportion (99%) of homes within a 5 minute/400m walk of a central bus route.

It is estimated that the greater number of potential passengers will result in a higher frequency service approximately every 10 min. which is more than the 2 to 3 buses per hour estimated for 3,339 homes.

4. Higher Quality Design

A greater number of dwellings provides the critical mass to be able to spend more on design quality at all scales. The quality of public open space and public realm as well as that of buildings would be improved. A development of approx. 4,000 dwellings would be likely to provide sufficient revenue and confidence to set a higher benchmark for design quality and for the incorporation of elements that contribute to a ‘sense of place’ such as public art.

5. More opportunity for innovative sustainable design features

Greater critical mass also means that measures such as the introduction of combined heat and power or other on-site energy generation becomes more viable and cost effective.

6. Diversity

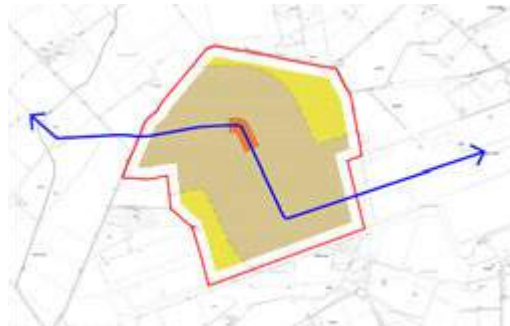
An important element to the quality of a new settlement is that of diversity. A larger development provides for a greater richness and variety at all scales. For example, our masterplan demonstrates how approx. 4,000 homes could generate a series of distinctive character areas, spaces and places that would be harder to achieve in a smaller settlement. There is also more likely to be a greater variety in built form (i.e. a range from higher density apartments in the centre and along public transport routes, to very low density development on the edges of the settlement) as well as in the type of provision (including self-build, custom-build and small scale builders). A development of 3,339 homes would be likely to have less diversity and variety in this respect.

7. Adaptability

A larger settlement is likely to be more robust and able to adapt and change in response to changing social, technological, and economic conditions.

Appendix A sets out an appraisal of the place-making benefits of providing a larger settlement of approx. 4,000 dwellings than the 3,339 homes proposed in ST15 (Reg 19, 2018).

Proposed ST15 Draft Allocation



- » 3,339 dwellings
- » One neighbourhood
- » 83% of housing within 400m/5 minutes of bus route



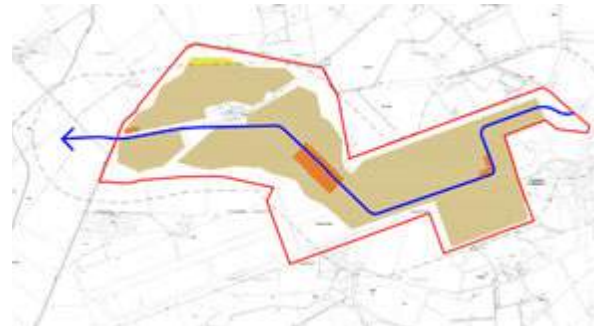
- » 28% of allocation is brownfield
- » 72% of allocation is greenfield land



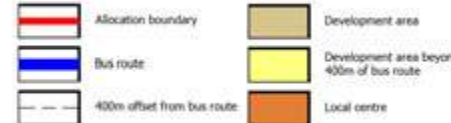
Net change in brownfield/greenfield			
All areas in hectares	Existing	Once the development is complete (on the basis that 40% of the site is parks and green space)	+/-
Greenfield/green space	121	67	-54
Brownfield	46	100	+54
Total	167	167	0

*CVC have identified an additional area of proposed new open space (OS10) as part of the allocation.

Proposed Modification to ST15 Draft Allocation



- » 4,000 dwellings
- » Linear form reflects locally distinctive towns
- » Three walkable neighbourhoods
- » 99% within 400m/5 minutes of bus route



- » 50% of the allocation is 'brownfield land'
- » 50% of allocation is 'greenfield land'



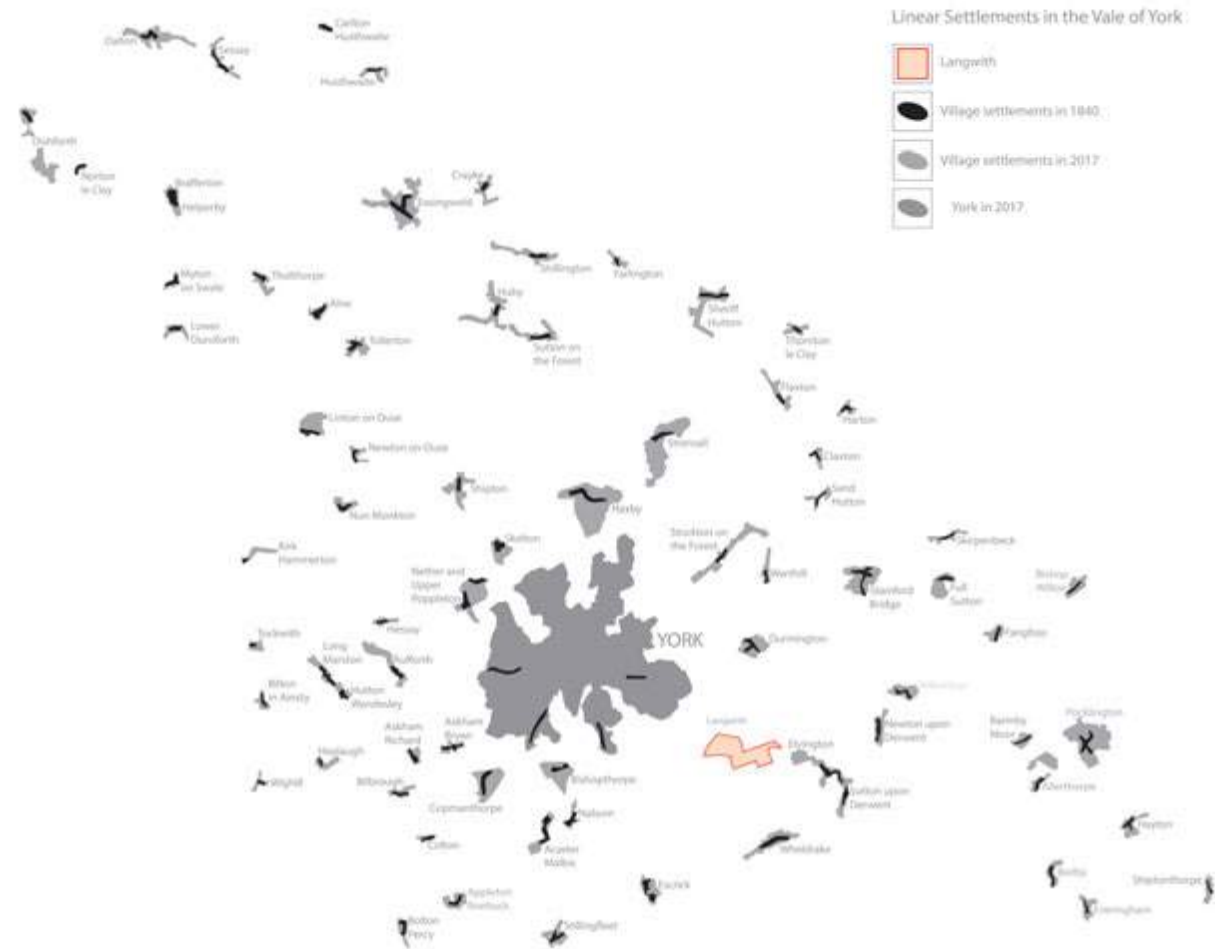
Net change in brownfield/greenfield					
All areas in hectares	Existing	Once the development is complete (on the basis that 40% of the site is parks and green space)	+/-	Restoration of the remainder of the airfield to greenfield	+/-
Greenfield/green space	101	81.6	-19.5	+55	+35.6
Brownfield	103	122.4	+19.5	-55	-35.6
Total	204	204	0	0	0

The Masterplanning Benefits of Langwith

The following section highlights the advantages of our site (Langwith) in comparison with ST15. It identifies the principles that Langwith has been design with and how ST15 is not sound to good practice.

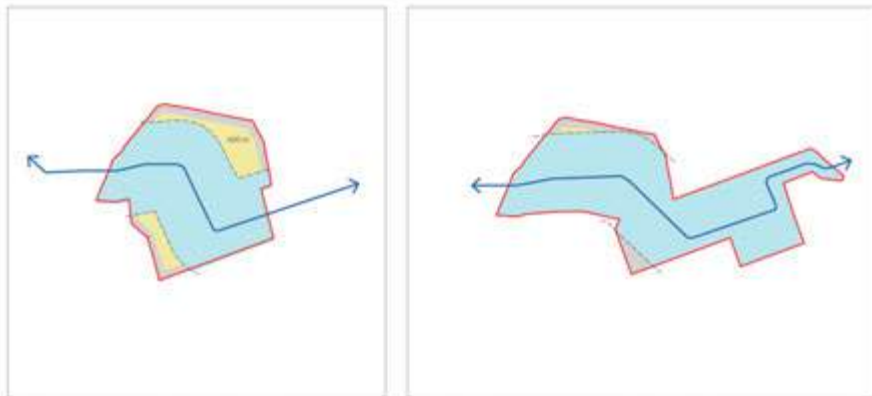
The shape of the development

Langwith will be an exciting and vibrant new garden village, that will plug into the existing network of surrounding villages of York. The linear character and elongated form of Langwith is in keeping with the historic compositions of villages in the area. However, ST15 differs from this characteristic presenting a site that is compacted and in clashing with the historic character of its context.



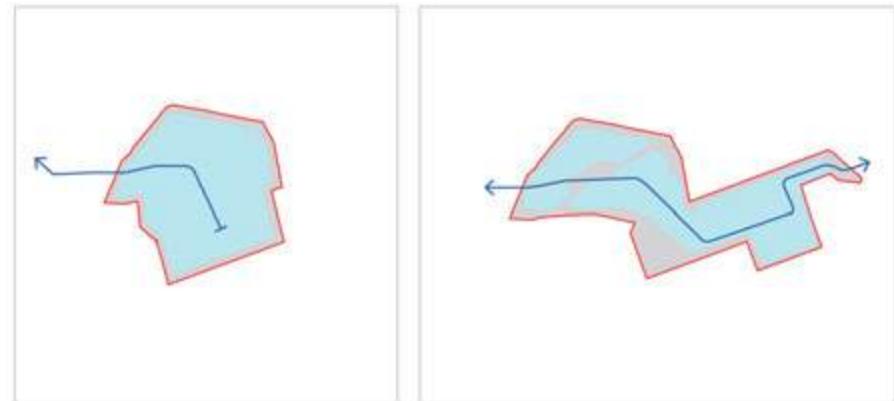
Walkable neighbourhoods

The advantages of this linear characteristic are in keeping with a fundamental principle of garden villages, which is the creation of walkable neighbourhoods and that all houses should be located within a 400m radius of a bus stop. A centrally located movement corridor allows for 99% of the houses in Langwith to be within a bus 400m distances from the nearest stop, encouraging the use of public transport through easy access. ST15 would only be able to achieve just over 80% of houses located within this 400m offset corridor to access sustainable transport modes, meaning that the shape of the development clashes with the aspirations and principles desired to be achieved.



Legibility and movement

The proposals of Langwith are designed around 2 access points, meaning that the site complies with good urban design practice and in keeping with important principles such as; legibility, easy way finding and navigating. ST15, however, proposes a single access (with only the potential of a secondary access off Elvington Lane) which would create a cul-de-sac like development, failing to produce a scheme based on good urban design practice. Garden village developments encourage maximisation of links and connections from the site to its surroundings, having only 1 point of access would have a big negative impact on this. However, Langwith (Reg 19, 2018), satisfies these principles.



The Concept

The strategic concept for Langwith Garden Village is to create a sustainable settlement form which is based on the characteristic linear form of north Yorkshire Villages as well as creating a new significant ‘Green Lung’ for the City. The concept diagram on the opposite page shows how 192ha of protected nature reserve would be created and how a central bus route would connect directly to the University of York, the City Centre as well as to Elvington Lane.

This central bus route would be within a 5 minute walk of 99% of homes and a 6 minute walk of 100% of homes. The incorporation of a bus loop within the western part of the site would ensure that all residents were within a 5 minute walk.

The concept proposes the creation of a Garden Village based on walkable neighbourhoods.

Walkable Neighbourhoods

The concept is based on a vibrant central high street which would provide a foodstore, offices, a health centre, community centre, shops, café and restaurants as well as two primary schools.

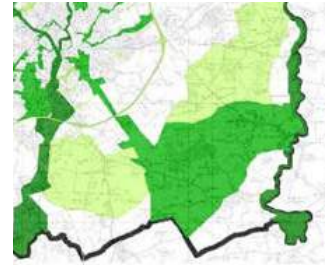
A main village centre is situated centrally along the bus route corridor comprising retail, employment, and community uses. Two smaller neighbourhood centres would also be provided to cater for the day to day needs of residents, comprising commercial and retail uses.

Green Lung

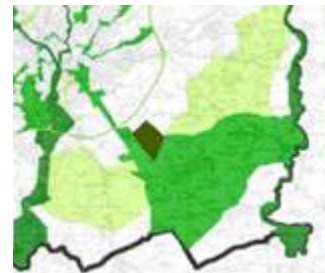
A major new Green Lung for the city will be created comprising 192ha of protected nature reserve. The objective is to make this area of national significance for nature conservation.

Air Museum

An area of land adjacent to the Air Museum has been dedicated for outdoor displays, and an arboretum. The Garden Village will contribute to local culture.

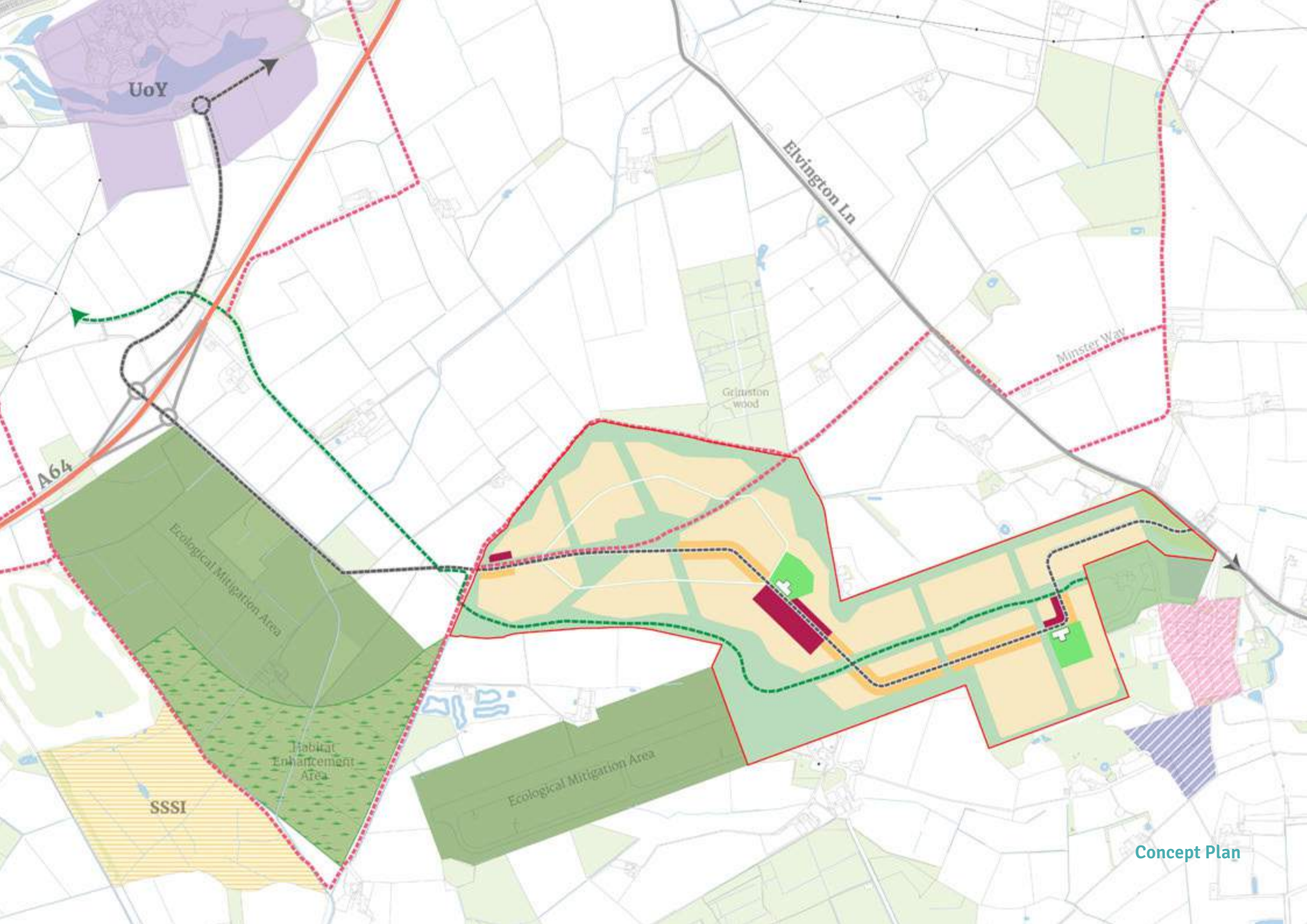


Extract from the City of York Local Plan showing existing city-wide Green Infrastructure



Proposed Green Infrastructure city wide with addition of Langwith “Green Lung”





UoY

Elvington Ln

Minster Way

Geirston wood

A64

Ecological Mitigation Area

Habitat Enhancement Area

SSSI

Ecological Mitigation Area

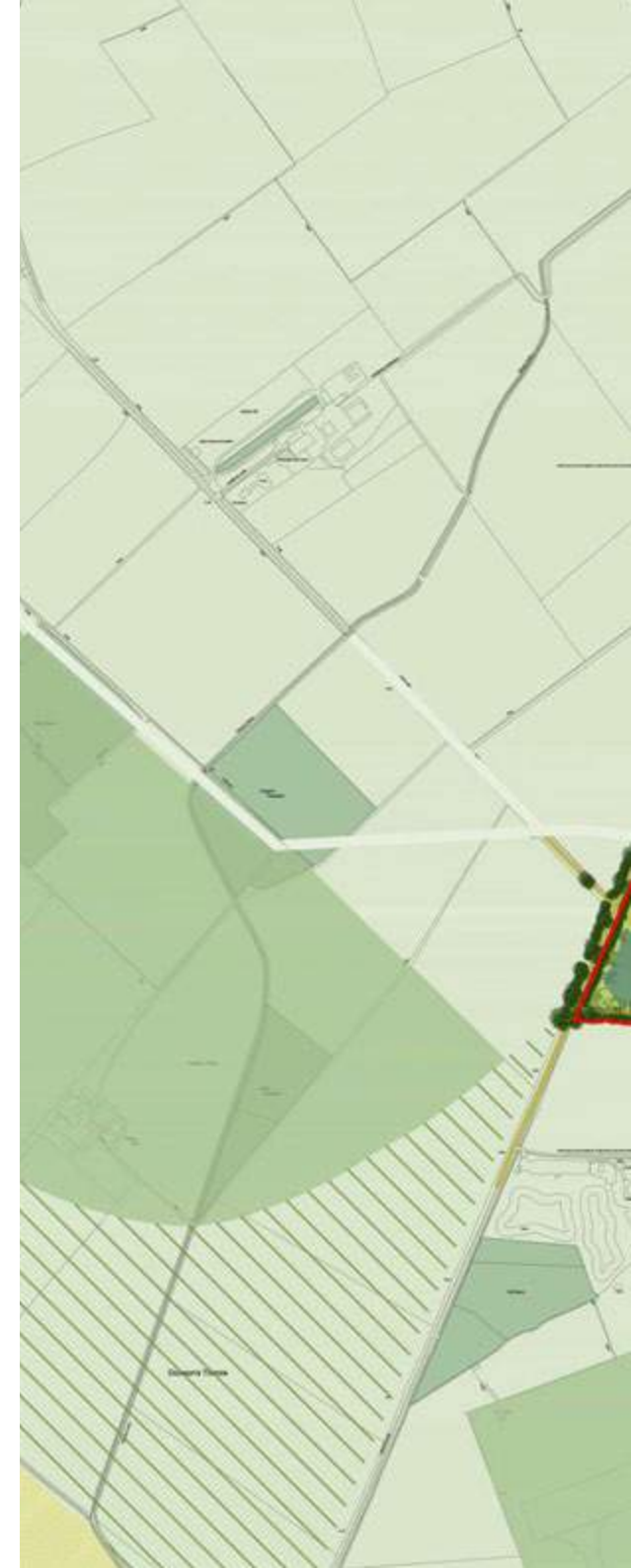
Concept Plan

The Masterplan

The masterplan presented here shows how Langwith Garden Village could be developed to create a high quality, sustainable settlement that reflects Garden Village principles.

The masterplan incorporates the following key principles:

- » A legible and permeable network of streets, routes and green corridors which connect the settlement to the wider area
- » A range of shops, services and facilities provided within easy walking distance of all homes
- » A sustainable and balanced mix of housing types including higher density development along the central bus route and in the centre and lower density housing at the edges
- » A network of connected multi-functional green routes and spaces
- » A network of direct and attractive pedestrian and cycle routes
- » The character of the Minster Way is protected and connections to it provided
- » Direct and attractive 'cycle highways' connecting to the city centre
- » Green corridors and open spaces provide for long distance views to the surrounding countryside and local features
- » Pocket parks and local community green spaces within residential areas
- » Retention of important trees and hedgerows into the development within green spaces, green corridors or streets
- » Two primary schools
- » One secondary school
- » Retention and incorporation of Common Lane, Long Lane and Langwith Stray as cycle/pedestrian routes which connect to new routes through the settlement
- » A public transport hub within the local centre
- » A community farm including the retention of the existing farm buildings
- » Important heritage assets will be protected and enhanced
- » Important long distance views (such as to York and the Wolds) will be protected and incorporated sensitively
- » The design quality of the Garden Village will respect and reinforce the reputation of York for beautiful buildings
- » The history of the site as an important airfield will be reflected and celebrated
- » Langwith House will be retained and incorporated sensitively





A central high street with the potential and flexibility to deliver a wide range of mixed-use development along its length

Community Park with pub/restaurant in retained Langwith Farmhouse

Strategic green corridors throughout the site, offering a legible and strong network of green infrastructure

Historic runways incorporated as a linear park

A total of approx. 4,000 high quality new homes, offering a balanced mix, types and tenures

2ha primary school

Proposed extension to Air Museum and Memorial Arboretum

New planting to strengthen the existing green infrastructure and improve and enhance ecological habitats

Mixed - use high street serving whole settlement

Connections with adjacent existing and proposed employment areas

Strong boundary between open space and Ecological area

A strong linear built form to reflect and celebrate existing Elvinton airfield

Incorporation of a public art strategy that celebrates the former use of the site as an airfield

Mixed use neighbourhood centre with 2.2ha primary school

ELVI


Land Use

This plan shows an indicative arrangement of land uses and the approximate quantum of these are set out below. The development ratio for the site is 60/40 (i.e 60% of the site is developed for built development and 40% is open space).

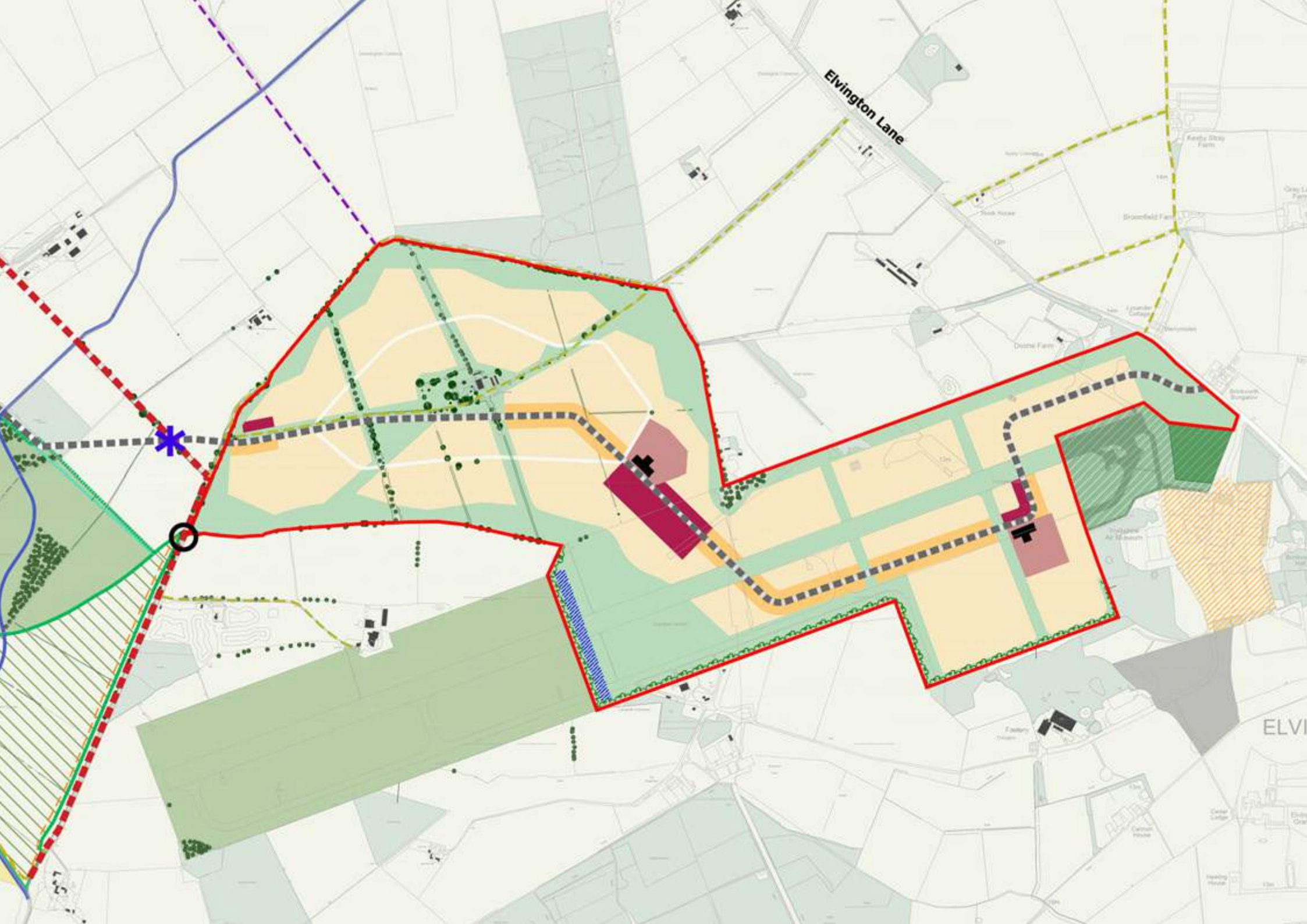
108.4 hectares of residential development is proposed, which includes 3,504 dwellings at an average density of 35dph and 375 dwellings at 45dph within a higher density transport corridor.

Land Use	Area	Quantum
Residential	108.44ha	3,504 at 35dph plus 375 at 45dph with higher density corridor and 139 in mixed-use centres = Approx. 4,000 dwellings
Mixed Use centres total	4.15ha	to include indicatively:
		two convenience foodstores 500-1,000 sqm each
		other shops and restaurants, pubs and cafés 1,000 sq m
		one health centre 900 sq m
		offices 2,000 sq m
		Two community centres 500 sq m in total
Primary schools	4.46ha	Two primary schools (one in the centre of each neighbourhood)
Open space	81.94ha	providing indicatively:
		Sports pitches
		Allotments
		Equipped and informal children's play
		Amenity open space
Infrastructure	5.34ha	
Total Site	204.33ha	

Development Ratio	
Developed land (Residential/Schools/Mixed Use)	122.39ha 60%
Undeveloped Land (POS/SUDS/Sport etc)	81.94ha 40%
Total	204.33ha

-  Allocation Site Boundary
-  Proposed Residential
-  Higher Density Residential
-  Public Open Space
-  Primary Schools
-  Retail, Employment, Community Uses
-  Proposed Memorial Artwork
-  Proposed Extended curtilage to Yorkshire Air Museum
-  Existing Business Park
-  Proposed Dvington Business Park
-  Habitat Enhancement Area
-  Ecological Mitigation Area
-  Strategic Pedestrian / Cycle connections
-  Improved connectivity and opportunities for access to the university, Employment Quarters and wider established networks of footpaths, including Minister Way.
-  Tiltree Drain
-  Hestington Tiltree SSSI
-  Bus routes (including proposed link to LVRT)
-  Gated Access to Langwith Drive (prevents vehicular access to SSSI)
-  Water feature buffer
-  Common Lane / Long Lane / Langwith Drive - vehicular access for existing residents only
-  The Link Road will pass under Common Lane via a new Subway, thereby preventing any access to Hestington by Langwith traffic.
-  Vehicular movements between Long Lane and the new A66 Link Road will be controlled by the physical design of the junction, thereby preventing any access to Hestington by Langwith traffic.





Elvington Lane

Kerby Stone Farm

Stonfield Farm

Dome Farm

The Old Air Museum

ELVI

Movement Strategy

Provision of sustainable transport for all

Langwith Garden Village will be structured around the principle of the 'Walkable Neighbourhood' where local facilities and bus stops are located within a 5minute /400 metre walk from homes in order to maximise journeys by foot, cycle and bus.

At the heart of the new settlement will be schools, local shops, employment and other local facilities provided along a central high street. Langwith would provide 'human scale' street designs to create places where vehicles do not dominate and speeds are kept to a level that pedestrians and cyclists feel comfortable with.

Sustainable connections beyond the new settlement will be incorporated into the masterplan with links to the University of York and the Hull Road Park and Ride. Walking and cycling connections are provided to into the surrounding countryside and the city centre.

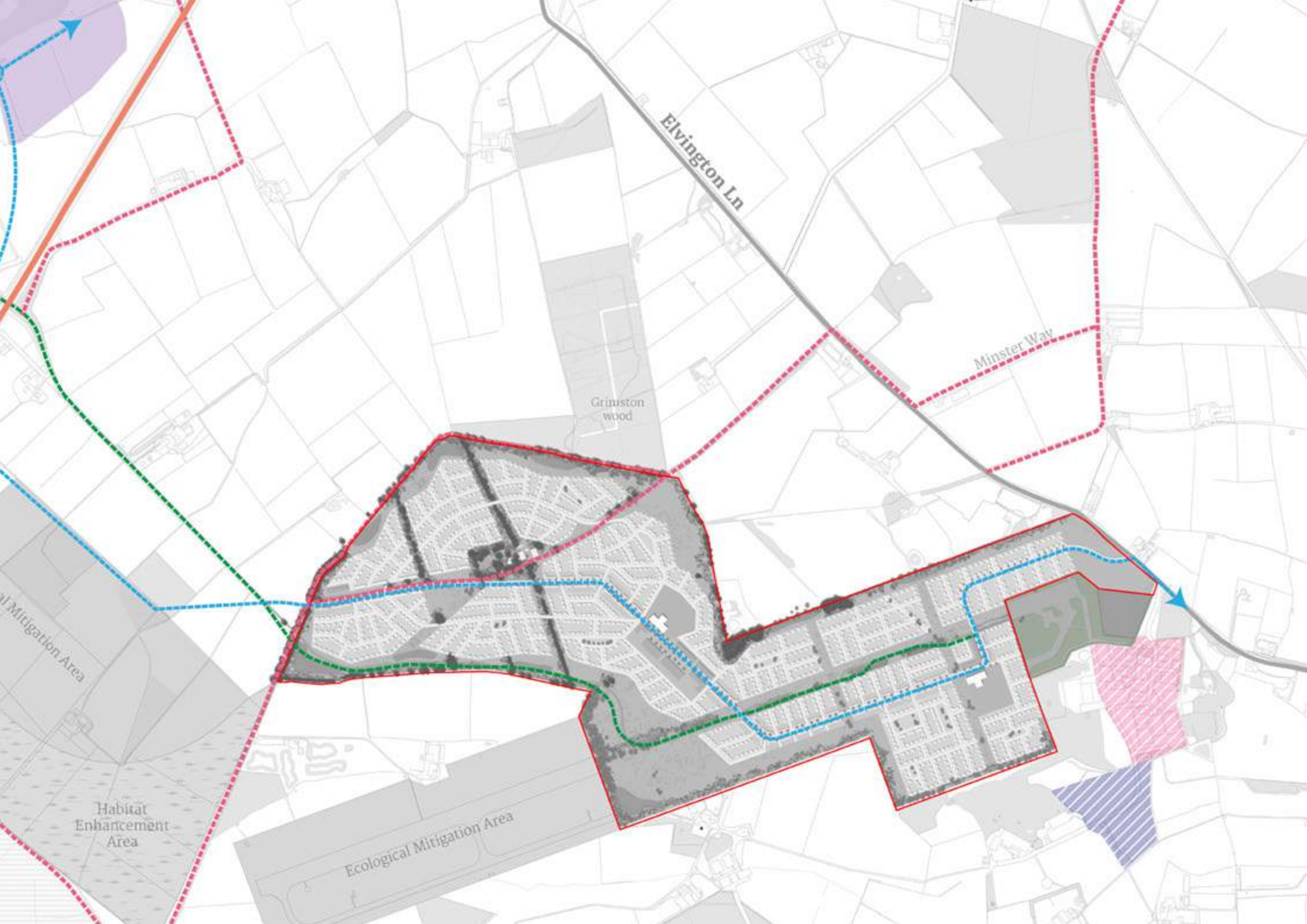
Langwith Garden Village will be a 'connected' place in terms of smart IT infrastructure and a town website and associated 'App' would be provided to help with many aspects of travel including car sharing, car club hire and more sustainable lifestyles.

Cycling is already a major movement mode in York accounting for 14.5% of trips to work from comparable wards. Langwith will build on this and it will be renowned for its excellent cycling facilities and routes. The flatness of the site together with the existing direct quiet rural lanes providing fast connectivity to both the university and the city centre suggest that this is deliverable.

A direct central cycle highway will be provided through the development connecting all of the residential areas. This will provide a safe, attractive, direct and efficient route for both electric and traditional bikes. New home owners will be encouraged to cycle with information on routes and well-designed streets and green lanes that cater for cyclists of all ages. The masterplan will provide for direct and level access for cycle movements within the Garden Village, the university and other destinations.

Long Lane and Common Lane will be cycle-only routes for Langwith residents and will provide safe, direct and attractive routes to the University of York and the City. Existing users of Common Lane and Long Lane will be able to continue to use this route to access their properties by car.





Green Infrastructure

Green Infrastructure

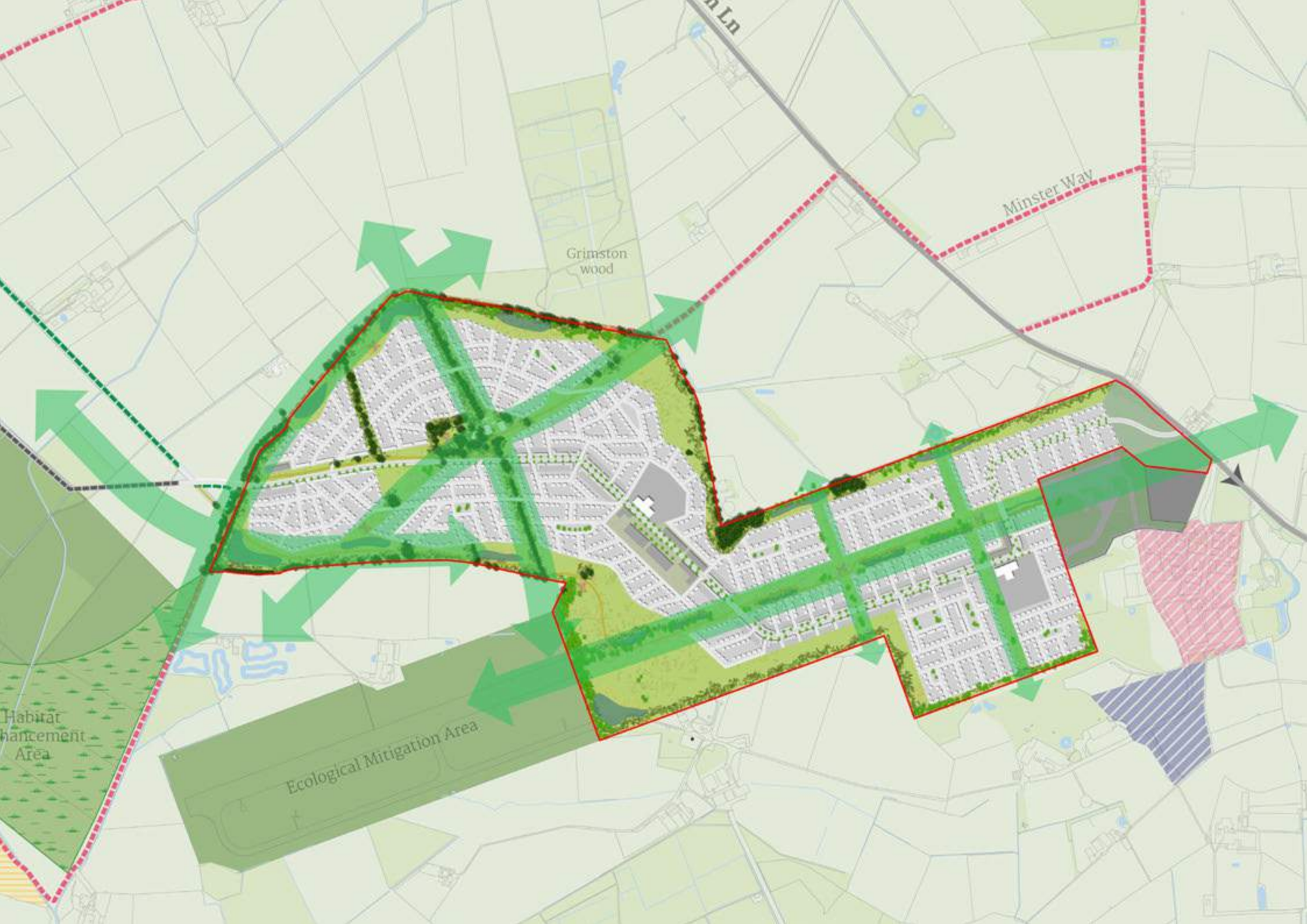
This plan shows the proposed approach to Green Infrastructure which seeks to deliver a connected, multi-functional network of green spaces and corridors. This network will permeate the residential areas and form part of the movement network for pedestrians and cyclists within the two walkable neighbourhoods, providing connections to the wider area and York City Centre.

This network will include: public open spaces, play areas, amenity space, playing pitches, sustainable urban drainage features, wildlife corridors, allotments and orchards, green movement corridors.

The strategy seeks to:

1. Provide 192ha of nature reserve which will provide a 'Green Lung' for the City and be of national significance for nature conservation. On the airfield part of the site 55 hectares of 'brownfield' land will be returned to greenfield as part of the creation of an Ecological Mitigation Area.
2. Respond to and incorporate existing and historic landscape features such as the Minster Way and the former runway.
3. Provide easy access to open space from all homes.
4. Encourage walking and cycling within the walkable neighbourhoods and to destinations outside the site.
5. Incorporate sustainable urban drainage features as safe and attractive landscape features.





Grimston wood

Minster Way

Habitat Enhancement Area

Ecological Mitigation Area

Conclusion

The principle of a new settlement to the South East of York is supported by City of York Council and would complement and reinforce the strategic settlement form of York by introducing a final village to complement the existing seven encircling York. This is an opportunity to create something truly great by taking a “confident bite” of land (50% of which is brownfield).

At approximately 4,000 homes, a 21st Century village of a similar scale to Haxby would be created. At this scale, a whole host of place-making benefits are deliverable and it is the combination of these that will bring about a step change in the sustainability and sense of community in the Garden Village.

Walkable neighbourhoods located on a central, direct and efficient bus route will provide for the delivery of a new Garden Village of the highest quality.

A commitment to the delivery of a development which genuinely reflects the principles of Garden Cities through the “Garden Village Charter” provides a robust framework that will ensure the delivery of a development with a real sense of community that is truly sustainable.

The strategic location of Langwith provides an opportunity to deliver a Garden Village that reinforces and complements the existing settlement pattern around York reflecting the approach advocated in URBED’s winning submission to the Wolfson Economics Prize 2014, albeit at a smaller scale. The issue of scale is important to the quality of the Garden Village and we have identified a number of specific additional benefits to quality of an increase in scale from the 3,339 homes proposed in the ST15 (Reg 19, 2018) to approximately 4,000 dwellings. Benefits include: the deliverability of key facilities and services; the viability of public transport; higher quality design and greater opportunity for innovative sustainable design features as a result of increase land value capture; greater diversity in character, density, building types and development delivery typologies. Langwith (Reg 19, 2018) would be a similar size to Haxby and would provide for a more balanced and sustainable community.

The Garden Village would draw on the distinctive settlements around York and beyond to create a settlement that reflects the linear form of these places as well as providing a 21st Century interpretation of their character. There would be an opportunity for the creation of distinctive character differences between and within the two neighbourhoods.

The masterplan structure shows ‘green hearts’ throughout the development. These would be connected via green corridors comprising pedestrian and cycle routes connecting all parts of the community, existing local movement routes and wider destinations. Additional local community green spaces are provided within the residential areas.

The Garden Village will be a model of sustainable transport. It will provide a direct,

rapid bus service which is within walking distance of every home connecting the city centre, University of York, Hull Road Park and Ride and other destinations. A direct and efficient dedicated ‘cycle highway’ for electric and traditional bikes will also be provided which will be within a short ride of each home along quiet and ‘human scaled’ streets

Checklist against Policy SS13 principles & objectives

This vision document has sought to demonstrate how a high quality, sustainable garden village will be delivered. The checklist below provides confirmation that the principles set out in draft Local Plan allocation ST15 (within the preferred sites consultation version) will be delivered.

Principle /Objective in SS13		How the masterplan provides for this
Indicate site capacity of 3,339	✓	Langwith (Reg 19, 2018) provides for at least 3,339 and up to approximately 4,000 homes
Density of 60% development @35dph	✓	The masterplan has been prepared on the basis of this density and development ratio
Sustainable housing mix	✓	Wide range of housing types and tenures proposed
High quality design and masterplan	✓	The masterplan, vision and Garden Village Charter provide a framework for a new settlement of exceptional quality
Create strategic greenspace to maintain views of the Minster, the Tillmire Drain and existing woodland	✓	These have been incorporated into the masterplan
Provide no net loss of biodiversity	✓	We will deliver a net gain in biodiversity through the Habitat Enhancement Area and biodiversity off-setting
Avoid impacts on Heslington SSSI and secure net gain in biodiversity	✓	We will deliver a net gain in biodiversity through the Habitat Enhancement Area (HEA) and biodiversity off-setting Including a robust approach to managing access at the SSSI and ensuring the HEA and other off set areas provide undisturbed habitat at a large scale
Protect character, setting and enjoyment of Minster Way	✓	Minster Way will be enhanced and its setting respected and protected
Provide appropriate range of shops, services and facilities	✓	A full range of shops and services to meet the day to day needs of the new community will be provided
Deliver on site education provision	✓	On-site education provision in the form of two primary schools will be provided
Ensure provision of necessary transport infrastructure to access the site	✓	This will be delivered at an early stage to ensure that the new settlement is well-connected
Retention of Common Lane/Long Lane/Langwith Stray as cycle/pedestrian routes only	✓	These have been protected and integrated within the masterplan and movement network
Provision of dedicated secure access for existing local residents and land owners	✓	The proposed access and movement strategy provides for this
Deliver high quality, frequent and accessible public transport services	✓	A high quality, direct and efficient bus service is proposed. The bus route will run centrally through the new settlement within easy walking distance of all homes
Optimise pedestrian and cycle integration, connection and accessibility	✓	The masterplan is based on the concept of walkable neighbourhoods and will comprise a legible and permeable network of attractive and accessible pedestrian and cycle routes

Appendix A

The place-making benefits resulting from an increase in the proposed housing from 3,339 to approx. 4,000

ST15 (Reg 19, 2018) identifies an indicative site capacity of 3,339 dwellings on an area of 159ha. Our proposed Langwith (Reg 19, 2018) allocation seek an increase in the extent of the proposed allocation to 204ha and an increase in the proposed number of dwellings to approx. 4,000 for a number of sound planning and place-making reasons. The representations set out in the Planning Document prepared by Quod explain the planning grounds to support an increase to approx. 4,000 dwellings. Here we set out the design quality and place-making benefits resulting from an increase in the scale of development.

The assessment set out below demonstrates that a new settlement of 3,339 dwellings (7,700 people) could be designed to be both sustainable and of a good quality, however a development comprising approx. 4,000 homes (approx. 10,000 people) would positively mean the creation of a more sustainable and deliver a number of additional qualitative benefits to the type of place created. The combined overall effects of these additional benefits to quality would be greater than the sum of the parts and would be transformational in terms of the type of place created.

Review of best practice in minimum settlement size

There is considerable consistency between various sources that a new settlement of around 4,000 homes or 10,000 people is a good optimum size for a new settlement.

In 'Best Practice in Urban Extensions and New Settlements' (2007) the Town and Country Planning Association state, "While a new town might approach a population of 100,000 and beyond, a new settlement might be for 10,000-20,000 residents". This equates to 4,000-8,700 homes.

The Government defines Garden Villages as being between 1,500 and 10,000 homes. For these reasons it is justified that a Garden Village of approx. 4,000 homes is appropriate. There is a pressing need for housing to meet the councils objectively assessed need and there has been an acceptance in the various iterations of the Local Plan that a new settlement of this scale is appropriate.

In terms of the size of a 'walkable neighbourhood' based on a 5minute or 400m walking catchment generates approximately 2,500-3,000 homes. This means that the proposed allocation has the potential to provide only one large walkable neighbourhood (albeit with some homes outside of the 'walkable catchment'). Approximately 4,000 homes, however, provides for three connected but distinct walkable neighbourhoods which has considerable benefits for place-making and sustainability as set out below.

In his winning submission to the Wolfson Economics Prize 2014, David Rudlin (URBED) recommended that new Garden Cities should be created out of a 'confident bite' to provide a robust framework for the delivery of a sustainable settlement, rather than allocating smaller sites which would not have the same critical mass for place-making.

The benefits to the quality of the place created

Sandby & Oakgate are opposing to the ST15 (Reg 19, 2018) allocation on the grounds that this site does not effectively deliver the aspirations and principles consistent with national policy. Only Langwith (Reg 19, 2018) has potential to deliver a sustainable allocation that will achieve a number of additional benefits over and above the existing allocation.

Taking the key vision objectives for the new settlement and the principles set out for ST15 (Reg 19, 2018) we set out below the additional benefits to each of these arising from an increase in the number of homes from 3,339 to approx. 4,000:

1. The creation of a new standalone settlement that reinforces the existing settlement pattern of villages around York's urban area

The existing settlements around York range in size from a few hundred homes to the largest one, Haxby which has approximately 5,200 homes and a population of 12,000. A new settlement of approx. 4,000 would therefore be an appropriate size and would reflect and reinforce the existing pattern of settlements and their size.

Of all the existing settlements around York, the one with the most facilities and most vibrant high street is Haxby (located to the north of York). A number of the smaller settlements are less self-sufficient and are more reliant on York for facilities and services modified allocation.

A settlement of 3,339 homes would not satisfactory be within the scale of existing settlements around York, a new settlement that is closer to the scale of Haxby (on the opposite side of York) would be more sustainable and vibrant than a smaller village.

2. The Garden Village will function as an identifiable community meeting local needs of future residents and built with facilities and services, jobs, green infrastructure, community hubs and a distinct sense of place

The quality of the place created and the overall 'sense of community' is to a large extent dependent on the potential to create attractive and vibrant mixed-use local centres. This in turn affects the settlement's ability to be self-sufficient and self-contained so that day to day needs can be met locally therefore reducing car use.

Spending projection estimates prepared by Quod have identified a significant difference between a development of 3,339 homes and one of approx. 4,000 homes.

From this comparison it is reasonable to conclude that the quality of the place and the sense of community will be significantly greater in a new settlement of approx. 4,000 homes compared to 3,339 homes. A development of 3,339 homes is more likely to rely on trips to other towns to meet its day to day needs and will therefore be less sustainable in this regard.

3. The Garden Village will have its own distinct local identity and will be defined by quality and innovation in its design.

The level of quality achieved in the design of spaces, buildings and the degree of innovation is related to the scale of development. A greater number of dwellings would provide the critical mass to be able to spend more on design quality at all scales. The architectural quality as well as the quality of public open space and the public realm is likely to be better with a larger scheme. Important 'place-making' initiatives such as the delivery of a public art strategy are more likely to be cost effective on larger developments. At approx. 4,000 homes a step-change in the quality delivered is possible. This is the case with a number of larger proposed settlements in the UK, such as Sherford.

At 3,339 homes, a high quality development with a strong sense of place could potentially be delivered. However, at approx. 4,000 an even higher quality development that would exceed the normal design standards for new large scale developments could be delivered. This is a similar scale to the Rieselfeld neighbourhood in Freiburg which has delivered an exemplar community of the highest design quality and sustainability.

4. Attractive, mixed income, high quality homes, widest choice of affordable homes

Another benefit of an increased settlement size to design quality is the potential for an increase in the diversity of housing. Diversity of housing type and tenure is an important urban design objective to creating a quality place. A larger new settlement would provide for a greater richness and variety at all scales. A home development of approx. 4,000 would allow for greater diversity in housing typologies with more high density apartments in the local centres and close to bus routes and the potential for areas of low density development at the edge of the village. This range in diversity is likely to be less pronounced in a settlement of 3,339 homes where the local centres will be smaller and the bus service less frequent.

As Quod have explained in the Planning Statement, a larger community will result in a significant increase in the number of affordable homes delivered. A further benefit of a larger settlement is likely to provide opportunities for innovative types of housing delivery such as self-build, custom build and small scale builders. This will have benefits for the diversity of housing provision as well as the delivery rates of housing.

5. Self-sufficiency in energy and heat production

The delivery of innovative sustainability measures such as site-wide combined heat and power becomes cost effective only once a specific critical mass is reached in terms of the number of dwellings.

The delivery of a CHP system could be delivered for either a 3,339 home or approx. 4,000 home development; however there are economies and additional benefits/outcomes as a result of developing the system for the larger number of units compared to the lesser such as :-

- » It could offer approximately a 200% increase on the amount of annual carbon savings from the CHP,
- » It could offer approximately a 200% increase on the value of fuel cost savings from the CHP,
- » It could achieve payback over a period of approximately 2/3 of the time that the 3,339 units CHP could.
- » Would provide a 200% increase in the annual electrical energy generated.

6. Generous green space

An increase in the scale of the settlement would provide a significant increase in the amount of public open space from 67 hectares to over 80 hectares. This means that the scale of the open spaces provided can increase and can become valuable city-wide assets.

The increased critical mass of housing and therefore amount of capital available to spend on the public realm and green space will mean a significant increase in the quality of the public spaces provided.

The proposals provide for significant areas of new habitat creation and enhancement.

7. Deliver high quality, frequent and accessible public transport services sustainable transport

The provision of a viable and sustainable bus connection between Langwith and the University of York and the City Centre will be more realistic with the provision of three walkable neighbourhoods with bus stops within each centre and with a total population of approx. 10,000 rather than a single neighbourhood of 7,700 people. Moreover, the 'three walkable neighbourhood' model can provide a greater proportion of residents within 400m of the bus route (99%) compared to 83% for the single walkable neighbourhood provided within ST15 (Reg 19, 2018).

The regularity and efficiency of the bus service is likely to be better with the larger population too;

- » The draft allocation (3,339 homes) would potentially support a commercial service at 2 to 3 buses per hour.
- » Langwith (Reg 19, 2018) (approx. 4,000 homes) would potentially support a higher frequency, for a bus service every 10 mins.

- » At frequencies of every 10 minutes, buses become sufficiently frequent as to enable residents and visitors to 'turn up and go', rather than rely on a timetable. In turn this reinforces the bus as a reliable and attractive choice for travelling between Langwith and the city centre.
- » Langwith (Reg 19, 2018) is therefore able to provide the necessary infrastructure and population density, to first introduce public transport services and then sustain a high frequency of service on a commercial basis in the long term.
- » There is greater potential for innovative public transport systems such as an automated electric shuttle between Langwith and the University of York.

8. A balanced network of high quality housing, local centres, community facilities and an excellent network of green infrastructure

The proposed model of three neighbourhoods connected by a central linear route not only allows for a more balanced network of housing, local centres and community facilities with almost all homes within a 5 minute walk of a local centre. It also means that there is easier access to the network of green space through green corridors and the green edges provided. These edges would be less accessible in the smaller 'single' neighbourhood model (see diagram on page 11).

9. A walkable place with all parts of the site within 400m of a public transport route

As set out above and illustrated in the diagram on page 11, Langwith (Reg 19, 2018) would result in a linear form with two neighbourhoods where the majority of homes are within 400m /minute walk of a public transport route.

ST15 (Reg 19, 2018) would make this difficult to achieve and a higher proportion of homes would be outside of a 5 minute walk of the bus route.

Summary and Conclusions

Langwith (Reg 19, 2018) would provide for a more balanced community comprising two distinct but connected walkable neighbourhoods each with its own local centre and community hub including a primary school.

Langwith (Reg 19, 2018) would also create a more sustainable development, giving rise to an additional package of benefits over and above those arising from ST15 (Reg 19, 2018).



**BARTON
WILLMORE**



APPENDIX 5

LANDSCAPE AND VISUAL ASSESSMENT



Quality Assurance

Document Title	Project Number	Prepared for	Prepared by	Date	Reviewed by
Landscape and Visual Assessment	1147.2	Sandby (York) Ltd & Oakgate/Caddick Group	Eleanor Houldcroft	26.03.2018	Mathew Jarvis

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Introduction

1.1 INTRODUCTION

The Landscape Agency Ltd (TLA) was appointed by Sandby (York) Ltd & Oakgate/Caddick Group (Sandby & Oakgate) to undertake a Landscape and Visual Assessment (LVA) which appraises landscape and visual issues relating to a new A64 road junction (Proposed Development). The Proposed Development is described in more detail within Section 1.5.

The requirement for a new junction is driven by the promotion of a new settlement located to the south of York. The proposed new settlement is being promoted through the recently updated York Local Plan by the City of York Council (CYC) 'ST15 - Land to the West of Elvington Lane' (ST15) and the alternative development site known as 'Langwith' as promoted by Sandby & Oakgate. Both developments are being proposed as a new sustainable garden village, with two new primary schools, a significant amount of publicly accessible open space and new habitat enhancement areas. It would primarily be accessible via a new junction on the A64, with secondary access via Elvington Lane. For clarity, there is no detailed landscape or visual assessment of either ST15 or Langwith within this LVA.

LVA's are important components of the overall landscape, planning and design process, when seeking to provide the best 'environmental fit' for any given development. The purpose of this LVA is to consider the potential effects of the Proposed Development on the surrounding landscape character and visual amenity, including the historic setting of York. Currently, Historic England consider the existing evidence base associated with ST15 and Langwith as being deficient. The LVA demonstrates the intervisibility between the Proposed Development and sensitive receptors such as heritage assets, for example York Minster, and highlights potential landscape and visual effects associated with the Proposed Development. The LVA is required to support written Representations to CYC as part of establishing their new Local Plan and does not form part of any planning application.

This document provides a landscape appraisal of the site based on a desktop review of all relevant literature, combined with field appraisals and an analysis of views of the site. The LVA considers the potential effects of the Proposed Development upon the following:

- Individual landscape features and elements;
- Landscape character; and
- Visual amenity and the people who view the landscape.

This LVA builds on the *A64 (A19-A1079) Zone of Theoretical Visibility Study* for Langwith carried out by Barton Willmore.

The key objectives of this report are to:

- Describe and evaluate the current **landscape character** of the site and its surroundings and to identify any notable landscape features within the site;
- Determine the **sensitivity of the landscape** to the type of development proposed;
- Consider the **visibility** of the site and surrounding area; and
- Establish **opportunities for and constraints to the development** of the site in landscape terms, to aid the development of proposals.

1.2 APPRAISAL METHODOLOGY

The methodology to support the LVA has been based on the following industry best-practice standard guidance:

- Guidelines for Landscape and Visual Impact Assessment, Third Edition. (2013) by the Landscape Institute and Institute of Environmental Management and Assessment, referred to as GLVIA3 within this methodology;
- Advice Note 01/11 - An Approach to Landscape Character Assessment (2014) by Natural England; and
- Photography and photomontage in landscape and visual impact assessment (2011) by the Landscape Institute.

Photography

The photography accompanying the LVA has been produced using the guidance within the Landscape Institute Advice Note 01/11 'Photography and photomontage in landscape and visual impact appraisal' as a basis, to provide a realistic representation of visibility based on those experienced with the naked eye.

For reasons of safety, photographs from the A64 are based on Google Street view. This has also enabled a representation of dynamic and sequential views along the road. The camera on the Google vehicle is mounted at roof height, rather than the 1.6m height of the other photographs within the LVA representative of eye level.

Zone of Theoretical Visibility Mapping and Analysis

The Bare Earth Zone of Theoretical Visibility (ZTV) has been produced through the combined use of Ordnance Survey Digital Terrain Mapping (DTM) together with a series of target points placed across the existing landform at set heights. Target points of 7m were used for the proposed heights of the roundabouts, calculated from a

1.0 Introduction

combination of the site layout proposals and localised topography levels. The calculation uses GIS viewshed analysis software and calculates where a person would theoretically be able to see the target points, with an eye height of 1.60m above existing ground level.

The calculation included a bare earth assessment and a reduced visual buffers assessment which illustrate the screening effects of buildings and vegetation present within the Study Area. The results provide a good basis for understanding theoretical visibility of the Proposed Development and help in identifying potential viewpoints.

Appraisal Process

Baseline Assessment

A baseline assessment illustrates the landscape context of the Site and is informed by an initial desktop review. This desktop review helps to identify an appropriate and proportionate extent to the Study Area along with identifying potential viewpoint locations which are likely to support further assessment within the field.

The baseline assessment is compiled from reviewing the following:

- Landscape designations;
- National and local landscape character assessments;
- Ordnance Survey mapping; and
- Aerial mapping.

Site Assessment

Following the completion of the desktop study, a site appraisal is carried out to assess potential landscape and visual receptors which may be affected by the development within the Site and provides an opportunity to verify the findings of the baseline assessment.

A field landscape appraisal was carried out by a Qualified Landscape Architect in June 2016 and March 2018.

Landscape and Visual Appraisal

Following a review of the baseline landscape and visual context of the Site and its Study Area along with the site assessment, the appraisal section considers the sensitivity of a landscape or visual receptor along with defining the anticipated magnitude of landscape or visual effects. Sections 3.0 and 4.0 of the methodology (see appendix A) illustrate the distinction between a landscape and a visual receptor and the associated assessment methodology used.

1.3 SOURCES OF INFORMATION

The following sources of information have been used in the assessment:

- Digital Ordnance Survey Mapping;
- Aerial photography of the site (2017);
- Natural England National Area Profile 28: Vale of York (November 2012);
- North Yorkshire and York Landscape Characterisation Project by Chris Blandford Associates (2011);
- City of York Historic Environment Characterisation Project (2014);
- York Landscape Character Appraisal by ECUS (1996);
- City of York Council Heritage Topic Paper (September 2014);
- City of York Local Plan - Publication Draft February 2018 (Regulation 19 Consultation); and
- Fieldwork conducted by The Landscape Agency in March 2018.

1.4 APPLICATION SITE

The proposed application site (the Site) is located on the A64 to the southeast of the City of York, between two existing vehicular bridges over the highway. The bridge to the north-east links Common Lane and Long Lane, and to the south-west a bridge links Heslington Common and West Moor.

1.5 PROPOSED DEVELOPMENT

The Proposed Development (Appendix B) comprises a new junction on the A64 which would be required to provide highway access to either the ST15 allocation or the alternatively promoted Langwith site, along with access to the University.

The new junction would include slip roads with associated grading and planting, two roundabouts and a link road running under Common Lane and connecting to the York University Heslington East campus. The location of the Proposed Development has been influenced by the requirement of the centre of the new junction cannot be located closer than 2km from the centre of the existing Grimston Bar Interchange. The location of the Proposed Development has been agreed in principle with Highways England. For clarity, the Proposed Development is not intended to be illuminated, therefore no assessment of lighting has been made within this LVA.

Further technical appraisal of the junction location, design and overall requirements are made within the Highway Consultants (Lawrence Walker) 'Transport Appraisal - Technical Note TN1' dated March 2018.

1.6 EXTENT OF THE STUDY AREA

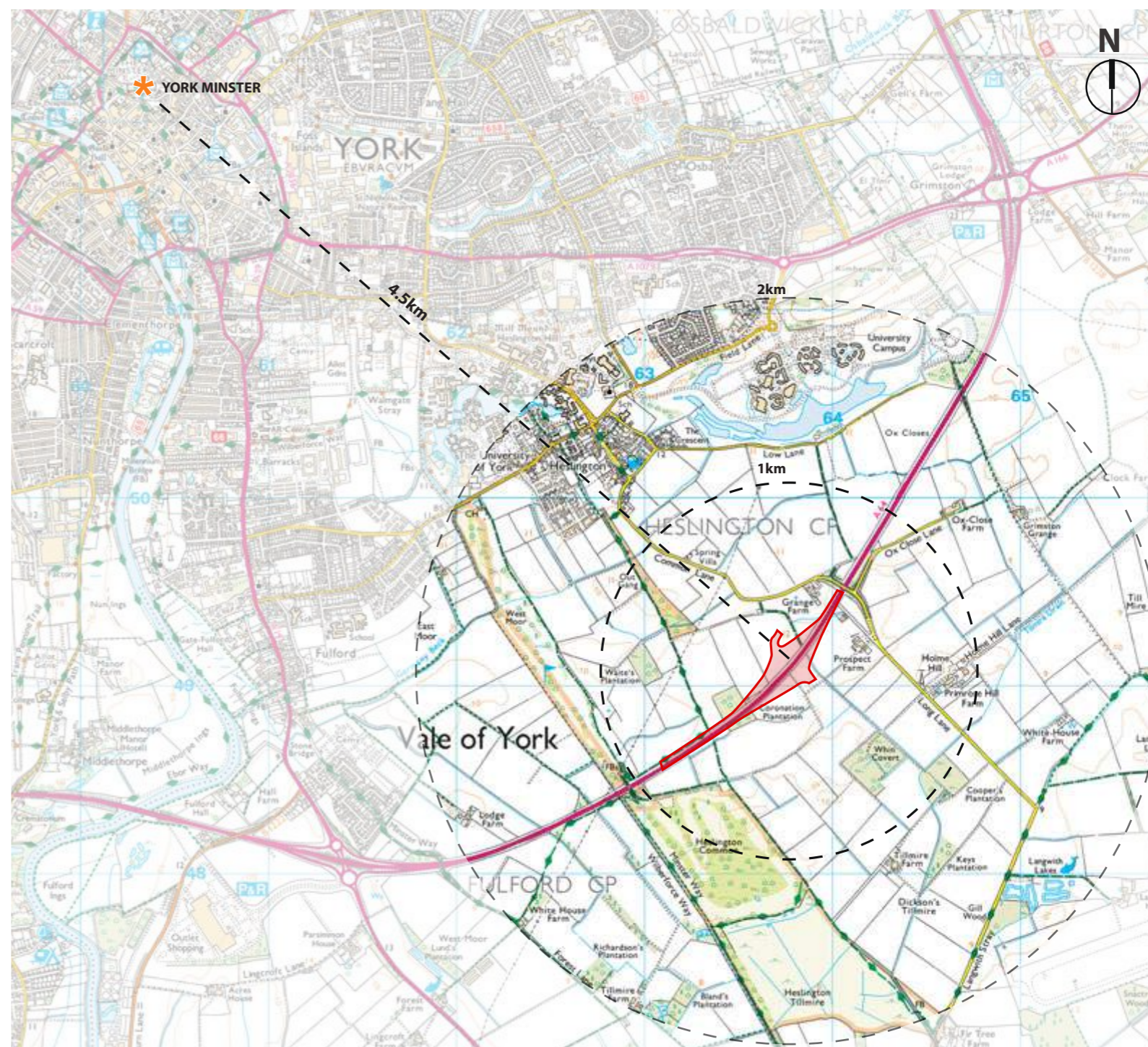
The extent of the Landscape and Visual Assessment Study Area is determined by the scale and nature of the Proposed Development and its likely significant effects on landscape and visual receptors in the surrounding area.

In the case of the Proposed Development, the Study Area of the appraisal was defined by a combination of the Zone of Theoretical Visibility mapping (Appendix C), professional judgement and field survey verification. Due to existing vegetation and the pattern of existing development, it is unlikely that the Proposed Development would cause any significant landscape and/ or visual effects on receptors located further than 2km from The Site. The LVA is therefore limited to the study of landscape and visual baseline conditions and effects within the 2km radius from the centre of the site i.e. the Study Area. In addition, given the prominence and cultural significance of the York Minster (Minster) to the character of York, views have been considered from the central tower, which is the highest point in York (Approximately 72 metres). The Minster is located 4.5km north-west of the Site.

1.7 POTENTIAL EFFECTS ARISING FROM THE PROPOSED DEVELOPMENT

Potential landscape and visual effects resulting from the Proposed Development may be summarised as;

- Direct temporary change in the landscape character of The Site during construction;
- Indirect temporary changes in landscape character within the Study Area during construction as a result of views of machinery, traffic movements, and construction activity;
- Permanent change in the character of the edges of The Site from agricultural use to infrastructure;
- Permanent indirect change on the character of the adjacent landscape through the introduction of additional infrastructure; and
- Temporary and permanent changes in the visual amenity within the Study Area arising from views of the completed junction.



▲ Figure 1: Site Location and Study Area

KEY

- The Site
- - - Linear distance (km) from centre of site

The background is a solid medium green color. On the left side, there are several overlapping, organic, light green shapes that resemble stylized leaves or abstract forms. These shapes are layered, with some appearing in front of others, creating a sense of depth. The shapes are smooth and rounded, with some having pointed ends.

Landscape Baseline

2.1 NATIONAL LANDSCAPE CHARACTER

In 1996, the former Countryside Agency (previously an amalgamation of the Countryside Commission and the Rural Development Commission - Defra) and English Nature, with support from English Heritage, produced The Character of England Map, 159 Joint Character Areas (JCA) for the whole of England. In 2006, Natural England was formed (through the amalgamation of the Countryside Agency and English Nature) and was made responsible for revising and maintaining all 159 JCAs, now known as National Character Areas (NCAs). 159 NCA profiles are areas that 'share similar landscape characteristics, and which follow natural lines in the landscape rather than administrative boundaries'. The documentation of these NCAs help to support a good approach to 'decision-making framework for the natural environment'. The Site is classified in the 'Character of England Map' as being located within character area 28: Vale of York (see Fig 2).

National Character Area 28: Vale of York

Key Characteristics include

- A largely **open, flat and low-lying** landscape between the higher land of the Southern Magnesian Limestone ridge to the west, the Howardian Hills to the north and the Yorkshire Wolds to the east.
- Predominantly agricultural land use, with **medium- to large-scale arable fields defined by hedgerows (which are often low and intermittent with sparse hedgerow trees)** and fences. Large dispersed farmsteads and small villages on higher land are set within a quiet rural landscape.
- **Wetland features** dotted through the wider landscape of the National Character Area, providing stepping stones between wider areas of water-dependent and priority habitat, such as important remnants of 'ings' meadows on the river flood plains (traditionally managed by hay-making) and some unimproved and semi-improved meadows and pastures, in particular in the Derwent Ings.
- Some **areas of heathland** remaining on poorer sandy soils (for example Strensall, Stockton and Allerthorpe commons), along with **small scattered broadleaved woodlands and larger conifer plantations**.
- The main urban centre, the City of York, with roads radiating from the city and **York Minster forming a prominent landmark** and focal point for the Vale.

The National Character Area incorporates such varied landscape components over a large area that any changes at the scale of The Site would not notably affect its overall character. As no effects of importance are anticipated, consideration of the effects at the National Character Area level is not discussed further as part of the LVA.

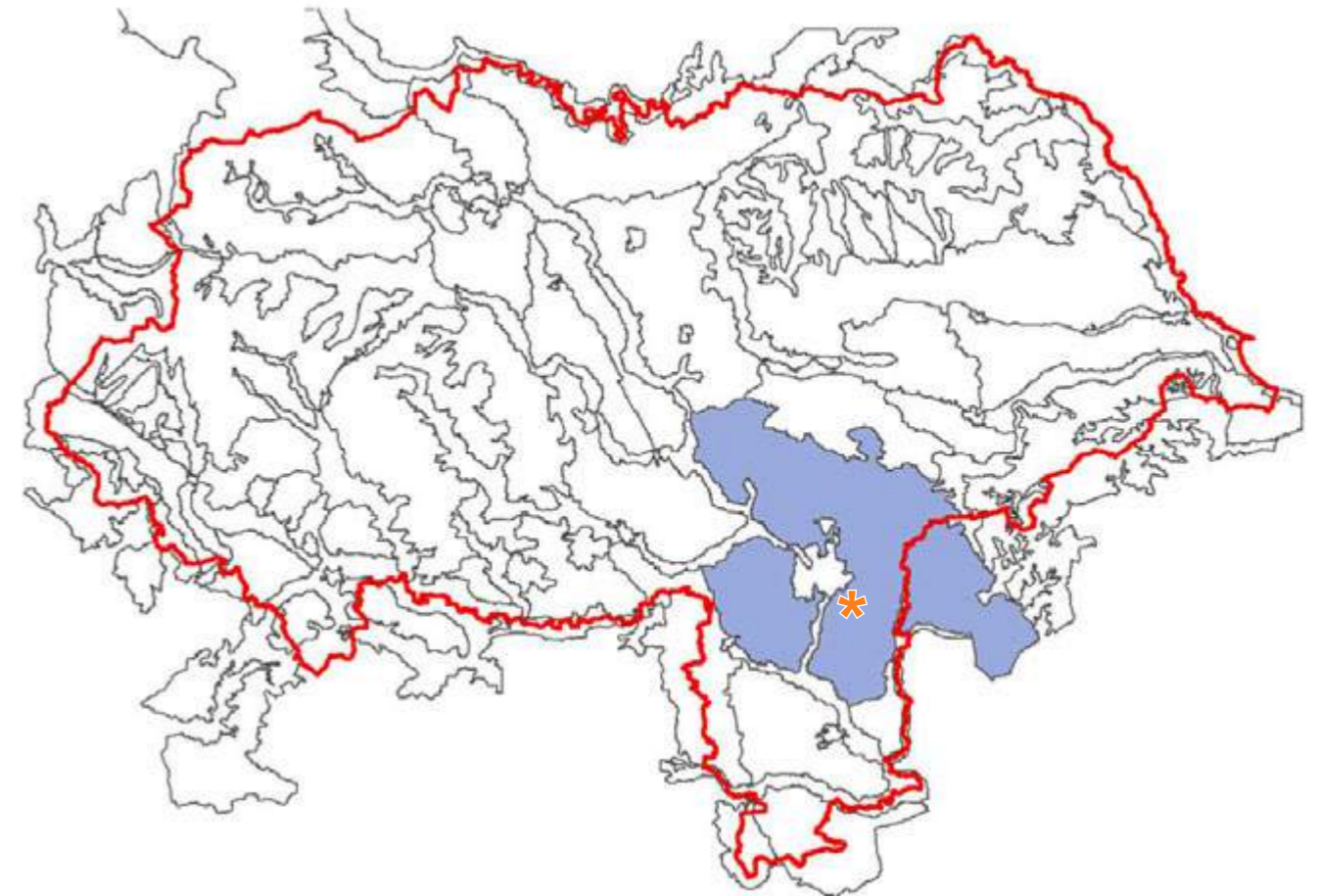
2.2 LOCAL LANDSCAPE CHARACTER

NORTH YORKSHIRE & YORK LANDSCAPE CHARACTERISATION PROJECT (2011) BY CHRIS BLANDFORD ASSOCIATES

The Site lies within the Character Area 28 Vale Farmland with Plantation Woodland and Heathland.

Key Characteristics include

- A patchwork of **low lying, predominantly arable fields**, often delineated by a network of mature hedgerows and interspersed with **patches of regular-shaped mixed and coniferous plantation woodlands**;
- Distant **visual containment** is provided by higher Landscape Character Types to the east and west;
- Strong **sense of openness** throughout much of this Landscape Character Type;
- Scattered settlement pattern of towns, villages and farmsteads within the landscape around the **main historic City of York** (which forms part of the Urban Landscapes Primary Landscape Unit);
- A **network of trunk roads** linking the larger settlements and towns.



▲ Fig 2: Extracted map from the North Yorkshire & York Landscape Characterisation Project: Character Area 28

2.0 Landscape Baseline

LANDSCAPE APPRAISAL (1996) BY ECUS

The Landscape Appraisal (1996) prepared for City of York Council by the Environmental Consultancy University of Sheffield (ECUS), identified twelve distinct landscape types in the Vale of York. The Site lies within Landscape Type 4: Wooded Arable Lowland.

Key Characteristics include

- Centrally flat with land rising gradually to the south east and north west
- Medium to large fields
- Mainly arable land use
- High woodland cover; mixed and coniferous plantations
- Fragmented hedgerows
- Sparse hedgerow trees
- Good wildlife value
- Ditches
- Wide tall grass verges

2.3 HISTORIC LANDSCAPE CHARACTER

The Heritage Topic Paper (2013) prepared for York sets out six principle 'special characteristics' which contribute to the significance and setting of the historic city:

- Strong urban form
- Compactness
- Landmark monuments
- Architectural character
- Archaeological complexity
- Landscape and setting

The Study Area contributes to the setting of York in the following ways:

Compactness

- The Site forms part of the open landscape around the A64 between the Fulford and Grimston Bar junctions. This represents the rural fringe of the city and views across this area are important in appreciating the compact, contained form of the city within a rural setting.
- Heslington East campus has started to encroach into the green space within the A64, but a buffer has been retained along the A64.

Landmark Monuments

- Rare, glimpsed views of the Minster and other heritage assets from the Study Area make a minor contribution to this characteristic.
- Refer to the Heritage Assessment by FAS for further details.

Archaeological complexity

- Refer to the Heritage Assessment by FAS for further details.

Landscape and setting

- Infrequent long-distance views towards the Wolds provide a sense of place within the wider Vale of York, and contribute to the setting of the city. These are achieved from the ring road, and the Minster Way PRoW.
- Very infrequent views into the city make a slight contribution to the connection with the urban core. The most notable view of the Minster is from the Minster Way.
- The open, rural character of the Study Area is significant to appreciating the historic, rural setting of the city.
- The section of A64 within the Site has a more enclosed character due to roadside planting and woodland blocks to the north-west of the Site. There are no views of the Minster from the A64 within the Site.

2.4 SITE SPECIFIC LANDSCAPE CHARACTER

TOPOGRAPHY

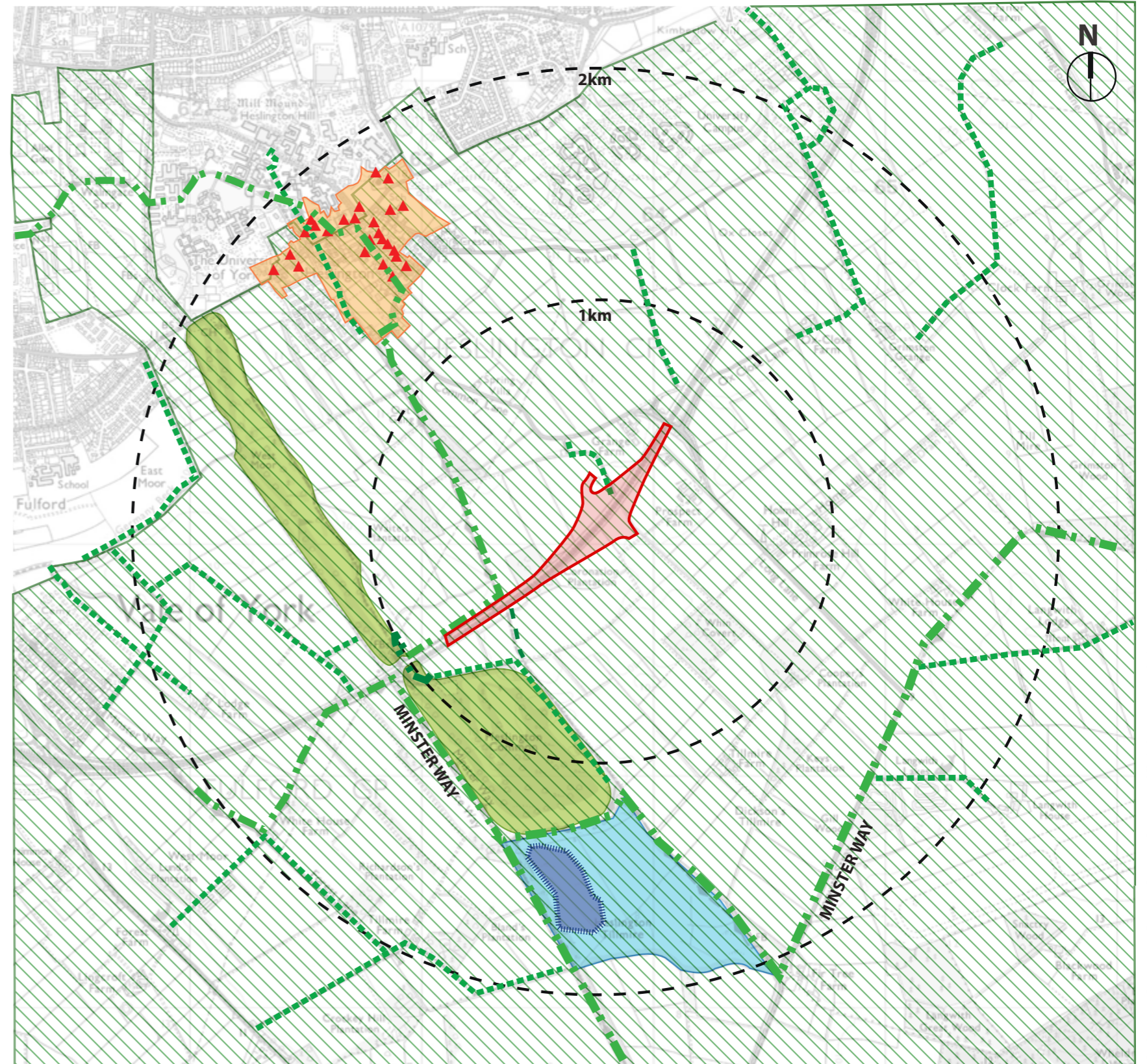
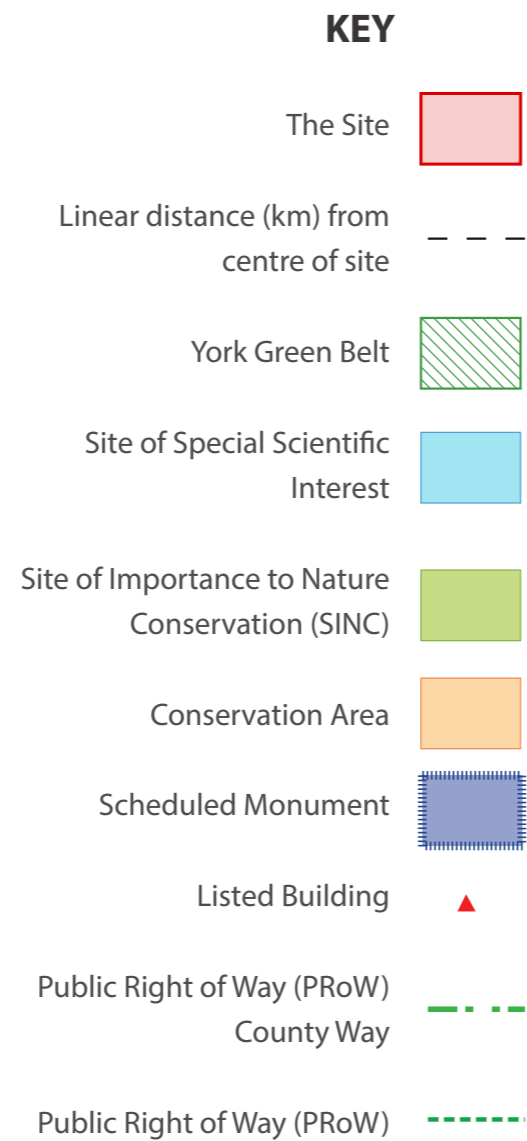
The Study Area is relatively flat and low-lying, reflecting the trend in topography within the Vale Farmland Character Type. Kimberlowe Hill to the north-east of the Site is a prominent area of higher ground (32 AOD) and the A64 footbridges are also distinctive features. The flat topography affords views towards the city and distant views east of the Wolds.

LAND USE AND LAND COVER

The Study Area comprises predominantly intensively farmed arable land, with large fields bounded by hedges. There is a high level of woodland cover within the Study Area, including Heslington Common, West Moor, Whin Covert, Cooper Plantation and Keys Plantation. The Site lies adjacent to Coronation Plantation. This woodland cover, in addition to hedges and wooded bridge embankments, provides a sense of enclosure along parts of the A64 within the Study Area.

2.5 LANDSCAPE DESIGNATIONS

Figure 4 illustrates the Statutory and Non-statutory designations relating to the Site and immediate context. The only statutory designation covering The Site is the York Green Belt.



▲ Figure 3: Landscape Designations

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2.0 Landscape Baseline

YORK GREEN BELT

York does not have an adopted Plan in place with land designated as Green Belt. The Green Belt around York was defined in general terms in the North Yorkshire County Structure Plan (NYCSP) in 1980. Policy E8 of the Structure Plan defines it as 'a belt whose outer edge is about 6 miles from York City Centre'; however, the Structure Plan does not define precise boundaries for the Green Belt.

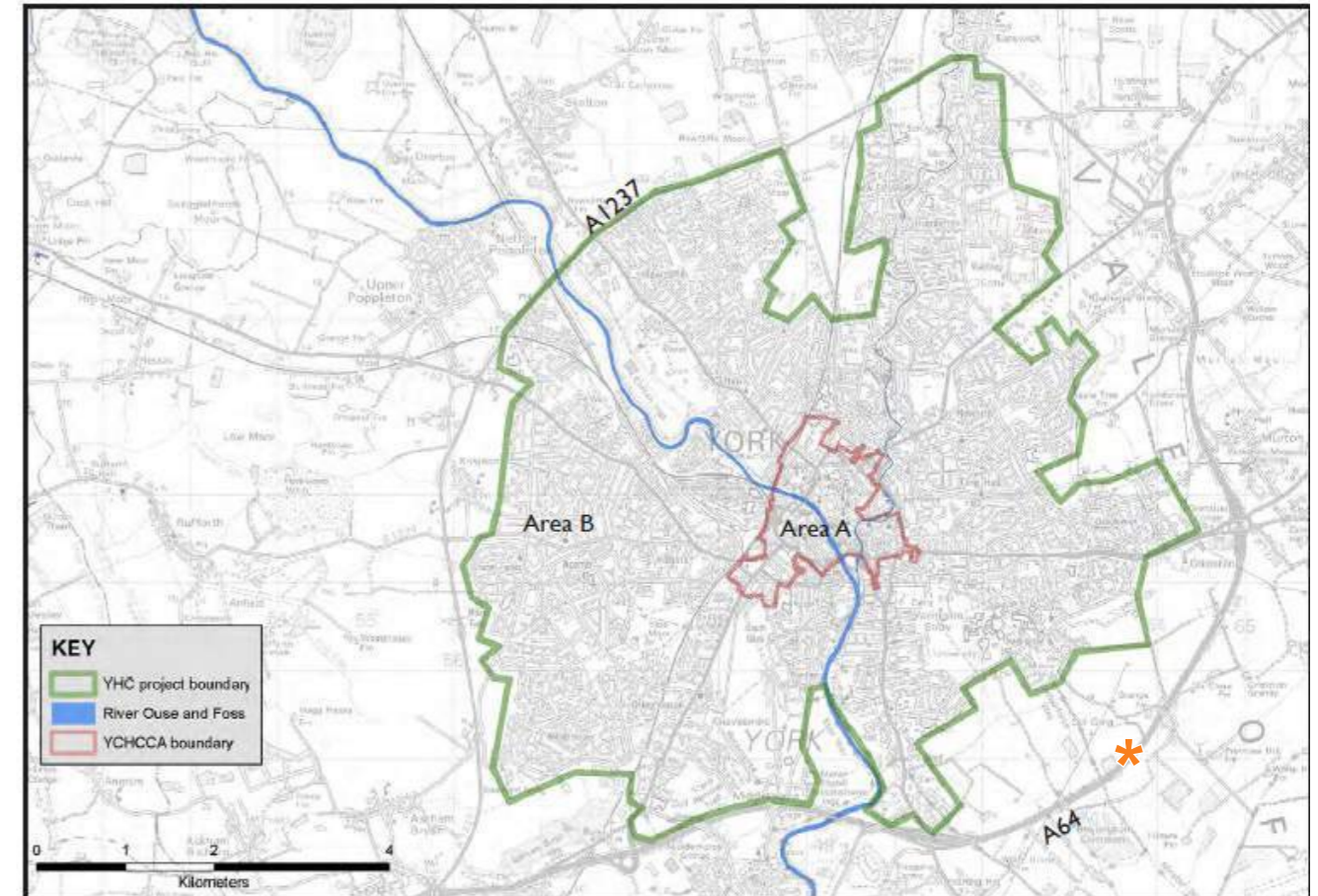
The 2003 Green Belt Appraisal prepared by City of York Council (CYC) identifies the most important purpose of the draft Green Belt in relation to York to be the 'preservation of the setting and special character of historic towns'. The setting and special character of York is suggested in the Appraisal to relate to:

1. Open approaches to the City.
2. Green Wedges.
3. Views of the Minster.
4. Character of the landscape.
5. Urban form.
6. Relationship between the urban edge and the countryside.
7. Relationship with the surrounding villages.

These characteristics have been grouped into four categories that represent, in CYC's view, the Most Valuable Areas of Green Belt and comprise:

1. Areas which retain, reinforce and extend the pattern of historic Green Wedges.
2. Areas which provide an impression of a historic city situated within a rural setting.
3. The setting of villages whose traditional form, character and relationship with the surrounding agricultural landscape is substantially unchanged,
4. Areas which prevent the coalescence of settlements to retain their identity.

The York Historic Character and Setting Technical Paper was developed in support of the draft Core Strategy (which was later abandoned at Examination by the Council in 2012). The Technical Paper identified the Most Valuable Areas of the Green Belt. The Site is not identified as a 'Most Valuable Area' of Green Belt as presented in the Technical Paper (2011).



▲ Figure 4: Extract map from the City of York Historic Environment Characterisation Project 2013 illustrating the Historic Core Conservation Area, and the whole built environment of York

- * The Site
- Area A: Historic Core Character Area Boundary
- Area B : York Historic Characterisation Project Boundary

HESLINGTON TILLMIRE SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)

Heslington Tillmire SSSI lies to the south-west of The Site. Due to the character of the Site being heavily influenced by the adjacent A64, without any significant vegetation or visual quality, it is not considered to contribute to the setting of the SSSI. Therefore no further consideration has been made within this report.

SCHEDULE MONUMENT

A World War II decoy is situated on Heslington Tillmire (NHLE 1020404). The decoy is not highly visible on the ground. Due to lack of intervisibility and distance from the Site, no impact is anticipated.

FULFORD GOLF COURSE SITE OF IMPORTANCE FOR NATURE CONSERVATION

Fulford Golf Course lies to the west of the Site and is designated a Site of Importance for Nature Conservation. Due to the character of the Site being heavily influenced by the adjacent A64, and the small size of the site, it is not considered to contribute to the setting of the SIN. Therefore no further consideration has been made within this report.

GREEN WEDGE

Heslington Tillmire and Fulford Golf Course form part of one of the designated Green Wedges in the York Local Plan that connect the city centre with the surrounding countryside. As above, due to the character of the Site being heavily influenced by the adjacent A64, and the small size of the site, the setting of the Green Wedge would not be affected and no impact is anticipated.

HESLINGTON CONSERVATION AREA

Heslington Conservation Area lies approximately 1km to the north-west of the Site. Due to intervening vegetation and the distance of the Conservation Area from the Site, the setting of the Conservation Area would not be affected.

LISTED BUILDINGS

Listed Buildings in the Study Area are contained within the built fabric of Heslington Village. The setting of these buildings would not be affected. Glimpsed views of the following Listed Buildings may be affected by the Proposed Development:

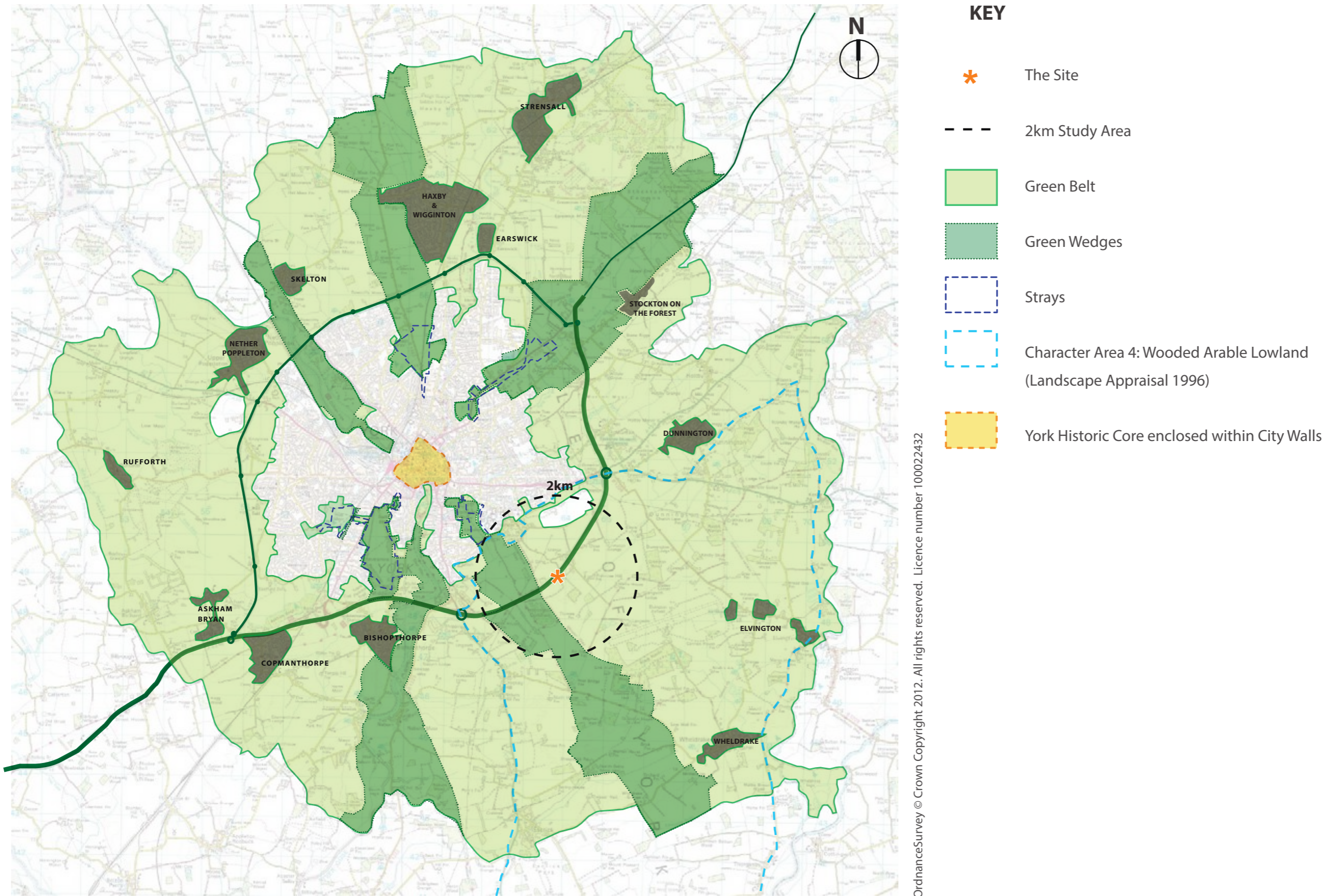
- Heslington Anglican and Methodist Church (1.7km north-west of the Site)
- York Minster (4.5km north-west of the Site)

PUBLIC RIGHTS OF WAY (PRoW)

A short section of adopted bridleway (Brend Lane) crosses the site, terminating at the A64. There are no other PRoW within The Site. A number of PRoW cross the landscape within the Study Area, broadly following field boundaries and local lanes.

The Minster Way, a county PRoW, links the medieval Minsters at Beverley and York, and reaches the A64 approximately 580m to the west of the Site.

2.0 Landscape Baseline



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▲ Figure 5: York Green Belt and Green Wedges

2.6 APPRAISAL OF POTENTIAL LANDSCAPE EFFECTS

Landscape effects are assessed both at The Site scale and for the wider landscape of the 2km radius Study Area, taking The Site’s contribution to overall character and value into account.

LANDSCAPE RECEPTOR	LANDSCAPE VALUE	SENSITIVITY TO THE PROPOSED DEVELOPMENT	POTENTIAL MAGNITUDE OF LANDSCAPE EFFECT
The Study Area (within 2km radius of the Site)	<p>Medium -</p> <ul style="list-style-type: none"> The Study Area is representative of the Wooded Arable Lowland Landscape Character Type. The Study Area contributes to the openness of the green belt in this location, the sense of compactness, and views of the Minster and Heslington Church. the A64 is a visually intrusive element and linear planting along the A64 has impacted upon the character, reducing the value of the Study Area. Conservation Interest includes listed buildings, Heslington Conservation Area and a scheduled ancient monument. A network of local PRow cross the Study Area, including a Long Distance Route, providing recreational value. The A64 corridor contributes an auditory influence within the wider Study Area, reducing the perception of tranquillity. 	<p>Medium –</p> <ul style="list-style-type: none"> Due to potential loss of some views of York and sense of openness along this section of the A64. This area does not contain any of the key views of the city. It is considered to have capacity to accommodate the Proposed Development without affecting its overall integrity. 	<p>Low -</p> <ul style="list-style-type: none"> Geographical extent of change is comparatively small. Proposed Development would affect views from the A64 but no views of the Minster would be affected. Development may obscure views of Heslington Church but these are considered minor. Development may obscure views of the Wolds from this section of the A64. No affect on recreational routes, including Minster Way. New views would be created from the new junction, providing a sense of the compactness of York within a rural setting. There would be some loss of the open setting of York, but this would be minor given the small size of the Site. The only designated landscape affected would be the Green Belt.
The Site	<p>Low -</p> <ul style="list-style-type: none"> Heavily influenced by the A64. The Site is characterised largely by the proximity to the A64 rather than by the surrounding agricultural landscape and is therefore not considered representative of the surrounding landscape character. No landscape elements which are considered to be rare and no notable landscape features within the Site. No designations indicating cultural heritage or ecological value. 	<p>Low –</p> <ul style="list-style-type: none"> Due to the strong influence of the A64 on the Site, and low landscape value. The Proposed Development would not introduce uncharacteristic elements in this location. 	<p>Medium -</p> <ul style="list-style-type: none"> The Site is already influenced by proximity to the A64 and the Proposed Development would not result in extensive change in character of the Site.

▲ Table 1: Appraisal of Potential Landscape Effects



Visual Baseline

3.1 INTRODUCTION

The visual baseline aims to establish the area in which the development may be visible, the different groups of people who may experience views of the development and the nature of the views and visual amenity at those points. This section does not provide a detailed assessment of the nature of the effect likely to occur, but to simply identify receptors of the proposed site.

To gain an understanding of the visual context within which the Site sits, a field survey has been conducted from a range of public receptors within 2km which are representative of the area. Photography was carried out in June 2016 and March 2018. Public Rights of Way within 2km of the Site were walked to assess the potential visibility of the development. Due to woodland blocks and planting along roads, views of the Site were primarily experienced within a 1km radius.

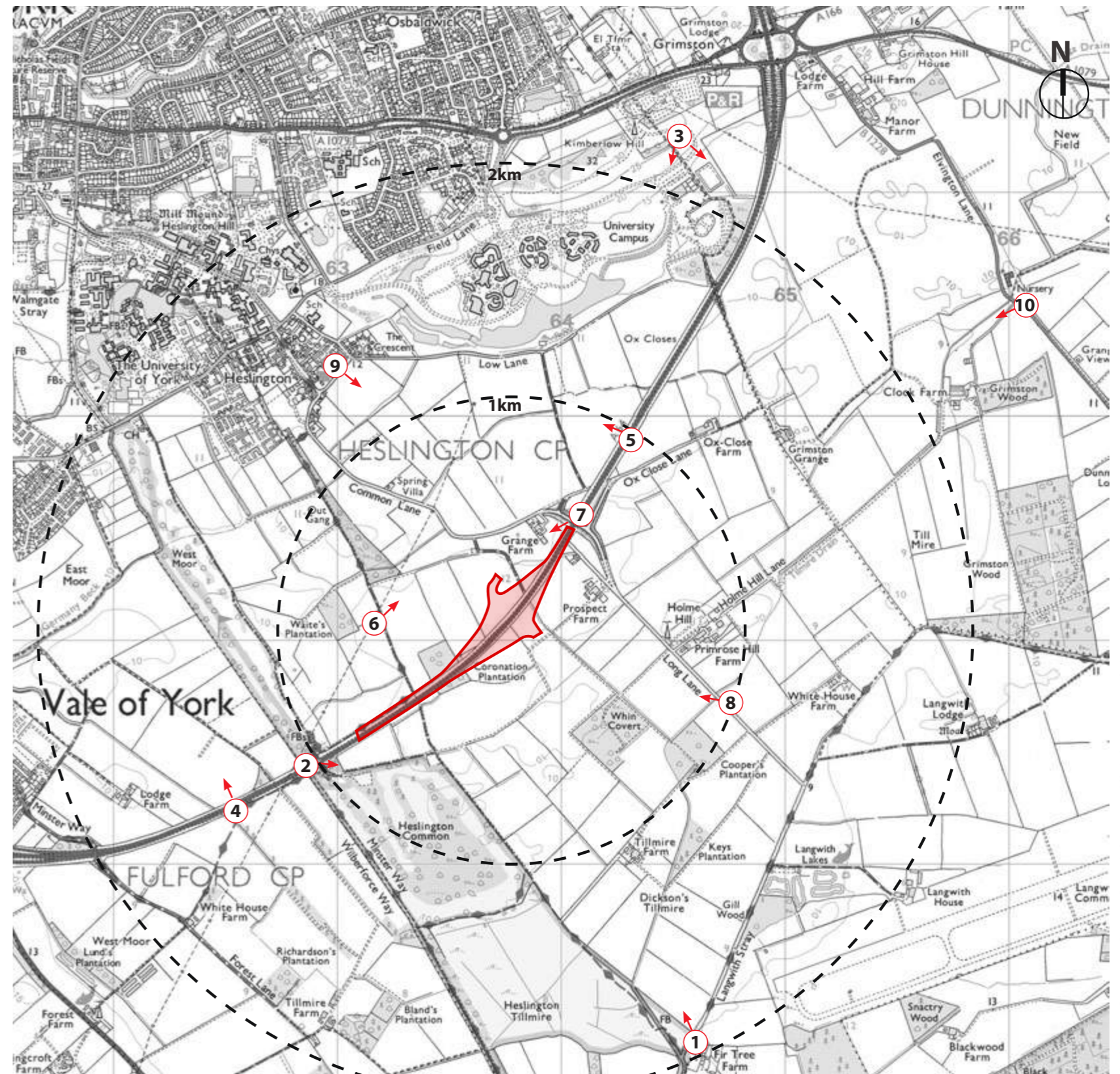
The following Section (Section 3.3 Appraisal of Potential Visual Effects) illustrates the views towards the Site from selected viewpoints (see figure 6). Within each of these views, we have demonstrated the overall approximate extent of the Site and if the Site is visible within each view i.e. if the existing ground plane is clearly visible through the use of red lines. The use of these red lines does not seek to clarify in detail the three-dimensional nature of the Proposed Development at this stage, simply the extent of the Site boundary within the view. However the ZTV - Reduced Buffers Assessment (See Section 3.2) does take into account the three-dimensional data of the Proposed Development, which was used to help confirm suitable viewpoint locations used for assessment.

3.2 ZTV ANALYSIS

The extent of the Study Area has been confirmed through production of a 'bare earth' and 'reduced buffers' Zone of Theoretical Visibility (ZTV) (Appendix C). These ZTV has been established by initial analysis of topographic maps, 3D digital modelling and terrain analysis and is based on the maximum theoretical visibility of the Proposed Development, based on a roundabout height of 7m. The Reduced Buffers ZTV includes the screening effects of buildings and vegetation across the Study Area.

The ZTV mapping confirms that views of the Site are primarily experienced within 2km radius. The mapping illustrates that Heslington Common and vegetation along the Minster Way prevent views to the south-west and north-west. The main areas of visibility are:

- To the north of the Site, extending to Heslington and the University Campus.
- Arable fields to the south of the Site as far as the Minster Way.
- Arable fields to the east of the Site, extending towards Elvington Lane.



▲ Figure 6: Viewpoint Location

3.0 Visual Baseline

3.3 APPRAISAL OF POTENTIAL VISUAL EFFECTS



VIEWPOINT REFERENCE	LOCATION	VISUAL RECEPTOR TYPE	SENSITIVITY OF RECEPTOR	DESCRIPTION OF VIEW	NATURE & DESCRIPTION OF LIKELY VISUAL EFFECTS
1	View Looking north-west from the Minster Way across the site towards York Minster	Users of PRoW	High	A panoramic view, providing the only location to view the Minster and Heslington Church along this section of the Minster Way. Woodland blocks and planting along the A64 encloses the view. This is a significant view in appreciating landmark monuments within their rural setting.	Much of the Site is not visible due to intervening vegetation, notably Whin Covert and Coronation Plantation. The Proposed Development would not affect the view of the Minster. The Proposed Development may obscure the view of Heslington Church. Proposed Development would form a minor component of the view, seen in the distance beyond fields and hedges. As such it is considered that the Proposed Development is likely to have a low magnitude of effect .

Approximate extent of Site Visible ———
 Approximate Site Extent ·····



VIEWPOINT REFERENCE	LOCATION	VISUAL RECEPTOR TYPE	SENSITIVITY OF RECEPTOR	DESCRIPTION OF VIEW	NATURE & DESCRIPTION OF LIKELY VISUAL EFFECTS
2	View Looking east from footbridge over the A64	Users of PRow	Medium	A distant view from the elevated footbridge looking south-east towards the Yorkshire Wolds on the horizon. The A64 in the foreground dominates the view. Woodland belts along the edge of the A64 contain this view.	This is a significant long-distance view providing a sense of place within the wider Vale of York. The Site lies to the left of the view, is not visible due to intervening vegetation and would have no affect on this view.

Approximate extent of Site Visible ———
 Approximate Site Extent ·····

3.0 Visual Baseline



VIEWPOINT REFERENCE	LOCATION	VISUAL RECEPTOR TYPE	SENSITIVITY OF RECEPTOR	DESCRIPTION OF VIEW	NATURE & DESCRIPTION OF LIKELY VISUAL EFFECTS
3a	View looking south-east from footpath through York University Heslington East campus, on Kimberlowe Hill	Users of PRoW	Medium	A panoramic view from an elevated location. Distant views of the Wolds. The A64 and pylons are discordant features which dominate the foreground. Site not visible, see viewpoint 3b for extent of site.	Refer to next page

See Viewpoint 3b for extent of site and its visibility



VIEWPOINT REFERENCE	LOCATION	VISUAL RECEPTOR TYPE	SENSITIVITY OF RECEPTOR	DESCRIPTION OF VIEW	NATURE & DESCRIPTION OF LIKELY VISUAL EFFECTS
3b	View looking south from footpath through York University Heslington East campus, on Kimberlowe Hill	Users of PRow	Medium	A panoramic view from an elevated location. The University Sports Hub building and parking area are discordant features which dominate the foreground. The majority of the PRow does not provide a view of the site due to an adjacent hedgerow.	The Proposed Development would only constitute a minor component of the view, due to the viewing distance and screening effect of hedges and trees. Given that the University Sports Hub is a dominant feature in the existing view the Proposed Development is likely to have a low magnitude of effect . The views looking south-east towards the Wolds from the PRow are more significant. These would not be affected by the Proposed Development. (Refer to facing photograph)

Approximate extent of Site Visible ———
 Approximate Site Extent - - - - -

3.0 Visual Baseline



VIEWPOINT REFERENCE	LOCATION	VISUAL RECEPTOR TYPE	SENSITIVITY OF RECEPTOR	DESCRIPTION OF VIEW	NATURE & DESCRIPTION OF LIKELY VISUAL EFFECTS
4	View Looking north-west from a layby on the northbound side of the A64 towards Fulford and the Minster	Users of A64	Medium	A panoramic view, providing a rare glimpse of the Minster and Heslington Church spire from this section of the A64. Woodland associated with West Moor encloses the view to the east.	The Site is not visible and would have no affect on this view of landmark monuments and appreciation of the contained character of York historic core.



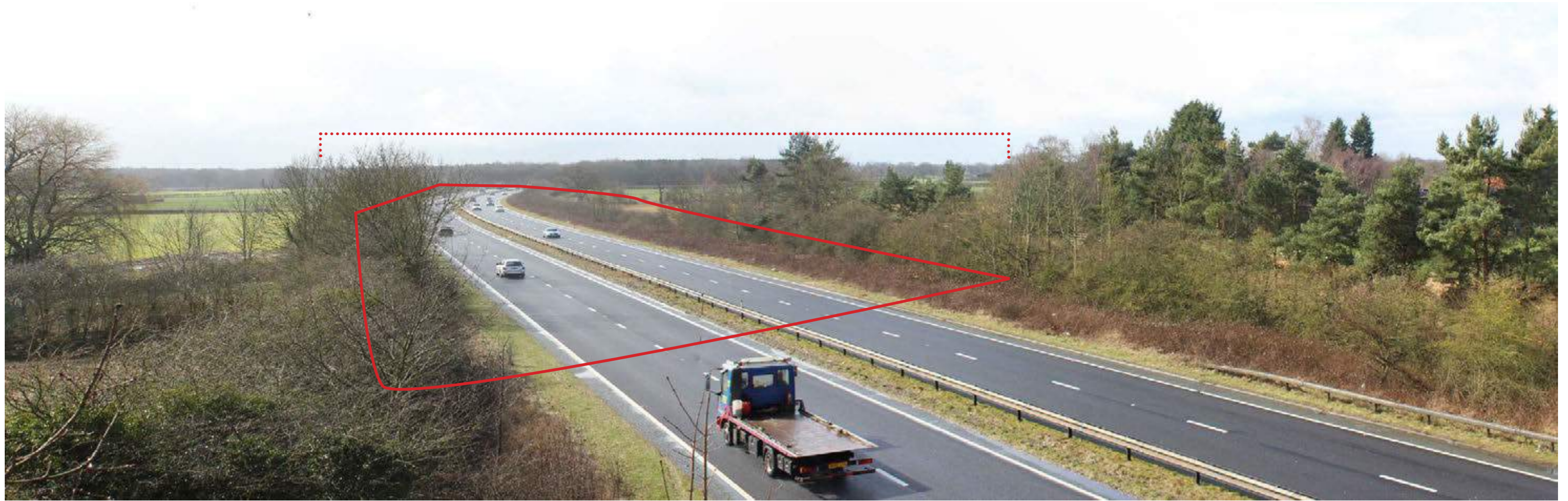
VIEWPOINT REFERENCE	LOCATION	VISUAL RECEPTOR TYPE	SENSITIVITY OF RECEPTOR	DESCRIPTION OF VIEW	NATURE & DESCRIPTION OF LIKELY VISUAL EFFECTS
5	View Looking north-west from a layby on northbound side of the A64 towards Heslington East campus and Heslington	Users of A64	Medium	Heslington East campus dominates the skyline, with Heslington Church spire visible to the left of the view. The campus is identified as contributing to the architectural character of York within the CYC Historic Environment Characterisation Project.	The Site is not visible and would have no affect on this view or appreciation of landmark monuments and architectural character.

3.0 Visual Baseline



VIEWPOINT REFERENCE	LOCATION	VISUAL RECEPTOR TYPE	SENSITIVITY OF RECEPTOR	DESCRIPTION OF VIEW	NATURE & DESCRIPTION OF LIKELY VISUAL EFFECTS
6	View looking east from the Minster Way across agricultural landscape north of the A64	Users of PRow	High	<p>An open view of arable fields and hedgerows. The A64 is visible in the middle-ground view. Distant views are contained by woodland.</p> <p>Views of the site from this section of the Minster Way are relatively rare due to existing woodland along the PRow.</p>	<p>The Proposed Development would be visible beyond the hedgerows and would alter the view. However, existing landscape characteristics such as the open fields in the foreground would remain. Given the A64 is visible, the Proposed Development would not be incongruous and would not affect any key views. As such it is likely to have a low-medium magnitude of effect.</p>

Approximate Site Extent



VIEWPOINT REFERENCE	LOCATION	VISUAL RECEPTOR TYPE	SENSITIVITY OF RECEPTOR	DESCRIPTION OF VIEW	NATURE & DESCRIPTION OF LIKELY VISUAL EFFECTS
7	View looking south-west from footbridge over the A64 across the site	Users of PRow	Medium	An elevated view from the footbridge. Distant views are contained by woodland around the A64. The A64 in the foreground dominates the view.	The Proposed Development would affect the majority of this view, obstructing longer views. However, given the prominence of the A64, the Proposed Development is not considered incongruous and would not result in loss of any significant landscape characteristics or views of landmark monuments. As such it is likely to have a medium magnitude of effect .

Approximate extent of Site Visible ⋯
 Approximate Site Extent —

3.0 Visual Baseline




VIEWPOINT REFERENCE	LOCATION	VISUAL RECEPTOR TYPE	SENSITIVITY OF RECEPTOR	DESCRIPTION OF VIEW	NATURE & DESCRIPTION OF LIKELY VISUAL EFFECTS
8	View looking west from Long Lane towards the Site and A64	Users of public highway	Medium	An open view of arable fields and hedgerows. The A64 is prominent in the middle-ground view. Distant views are contained by Whin Covert and vegetation along Long Lane.	The Proposed Development would be seen beyond the hedgerows and would alter the view. However, existing landscape characteristics such as the open fields in the foreground would remain. Given the A64 is visible, the Proposed Development would not be incongruous and would not affect any key views of York. As such it is likely to have a low-medium magnitude of effect .

Approximate Site Extent



VIEWPOINT REFERENCE	LOCATION	VISUAL RECEPTOR TYPE	SENSITIVITY OF RECEPTOR	DESCRIPTION OF VIEW	NATURE & DESCRIPTION OF LIKELY VISUAL EFFECTS
9	View looking south-east towards the site from Low Lane in Heslington Village	Residents and users of public highway	Medium	<p>An open view of arable fields and hedgerows. Pylons are discordant features.</p> <p>Views of the site from Low Lane are relatively rare due to existing high hedgerow along the road.</p>	<p>The Proposed Development would constitute a minor component of the view, due to the viewing distance and screening effect of hedges and woodland, with retention of existing landscape characteristics such as the open fields in the foreground. As such it is likely to have a low magnitude of effect.</p>

Approximate Site Extent


3.0 Visual Baseline



VIEWPOINT REFERENCE	LOCATION	VISUAL RECEPTOR TYPE	SENSITIVITY OF RECEPTOR	DESCRIPTION OF VIEW	NATURE & DESCRIPTION OF LIKELY VISUAL EFFECTS
10	View looking west towards the site and Heslington East campus from Elvington Lane B1228	Users of highway	Low	This represents views from Elvington Lane, where attention is generally focused on the road and views are transient.	The Site is not visible due to intervening vegetation and would have no affect on this view .



VIEWPOINT REFERENCE	LOCATION	VISUAL RECEPTOR TYPE	SENSITIVITY OF RECEPTOR	DESCRIPTION OF VIEW	NATURE & DESCRIPTION OF LIKELY VISUAL EFFECTS
11	View Looking south east from the Central Tower of York Minster	Visitors to the tower	High	Panoramic view across York	The extent of the Site forms a limited and minor component part of the overall view from the Minster and is not considered to cause significant harm to the setting of York. The Site is 4.5km from this viewpoint. At this distance, the Site is not physically discernible due to intervening vegetation, the A64 is not a dominant feature within the view, given the expansive nature of the surrounding countryside and as such the Proposed Development would have no affect on the view.

Approximate Site Extent



3.0 Visual Baseline

3.4 SUMMARY

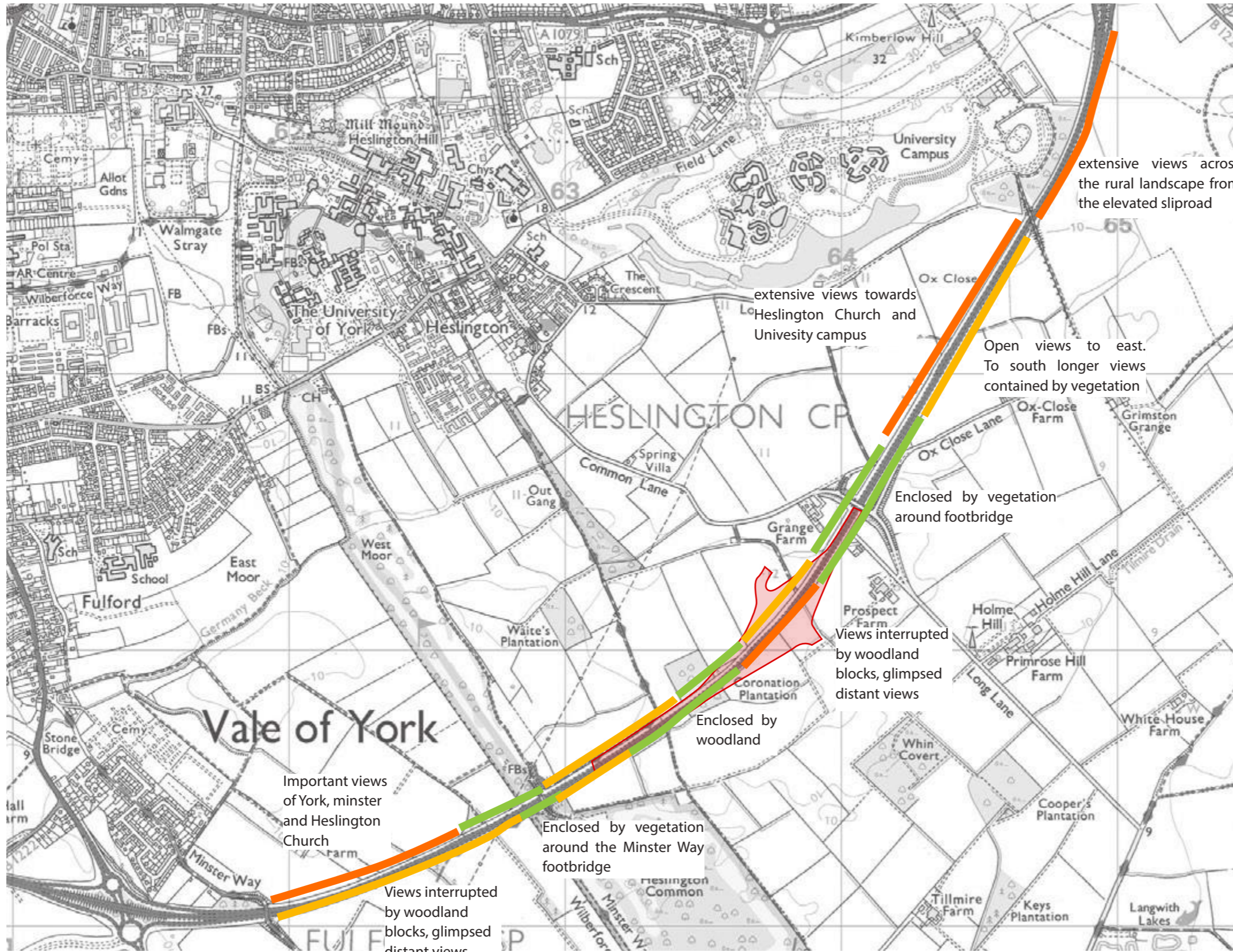
The Site makes limited contribution to views of York historic core and landmark monuments. Surrounding woodland blocks and vegetation along the A64 help to restrict visibility of the site. The main views of the Site are from the A64 and Minster Way.

VIEWPOINT REFERENCE	LOCATION	VISUAL RECEPTOR TYPE	SENSITIVITY OF RECEPTOR	POTENTIAL MAGNITUDE OF EFFECT
1	View Looking north-west from the Minster Way across the site towards York Minster	Users of PRow	High	Low
2	View Looking east from footbridge over the A64	Users of PRow	Medium	None
3	View looking south from footpath through York University Heslington East campus, on Kimberlowe Hill	Users of PRow	Medium	Low
4	View Looking northwest from a layby on the northbound side of the A64 towards Fulford and the Minster	Users of A64	Medium	None
5	View Looking northwest from a layby on northbound side of the A64 towards Heslington East campus and Heslington	Users of A64	Medium	None
6	View looking east from the Minster Way across agricultural landscape north of the A64	Users of PRow	High	Low-medium
7	View looking south-west from footbridge over the A64 across the site	Users of PRow	Medium	Medium
8	View looking west from Long Lane towards the Site and A64	Users of public highway	Medium	Low-medium
9	View looking south-east towards the site from Low Lane in Heslington Village	Residents and users of public highway	Medium	Low
10	View looking west towards the site and Heslington East campus from Elvington Lane B1228	Users of highway	Low	None
11	View Looking south east from the Central Tower of York Minster	Visitors to the tower	High	None

▲ Table 2: Summary of Potential Visual Effects

3.5 DYNAMIC VIEWS FROM THE A64

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KEY

- The Site
- Open views
- Views partly contained or interrupted by woodland blocks
- Enclosed

The following section illustrates the experience travelling in both directions along the A64 between the junction with the A19 and the junction with the A1079.

The photographs illustrate that the most significant views are:

- From the slip road to the A1079 junction, looking west across the rural landscape
- Between the junction with the A19 and the Minster Way footbridge, looking north towards York.

These views would not be affected by the proposed development. The frequency of bridges, embankments and mature vegetation along the section of A64 within the site significantly limits views of York.

▲ Fig 7: Landscape Character along the A64

3.0 Visual Baseline



▲ Viewpoint a

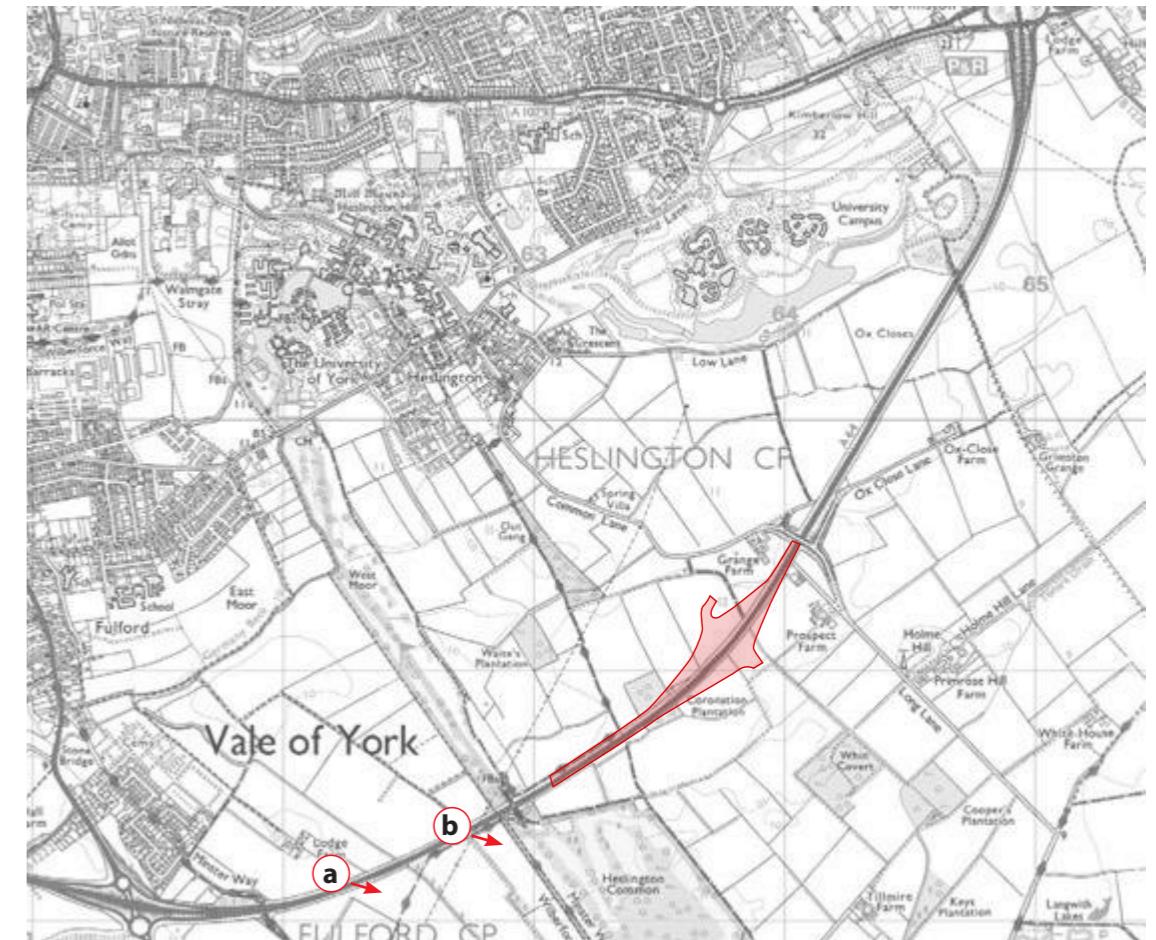


▲ Viewpoint b

NORTHBOUND

FROM A64 LOOKING EAST

- Dense mature vegetation within Fulford Golf Club occupies much of the horizon when looking east.
- A mix of semi mature-vegetation and mature trees line both sides of the carriageway.
- Some longer views south glimpsed.



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▲ Viewpoint c

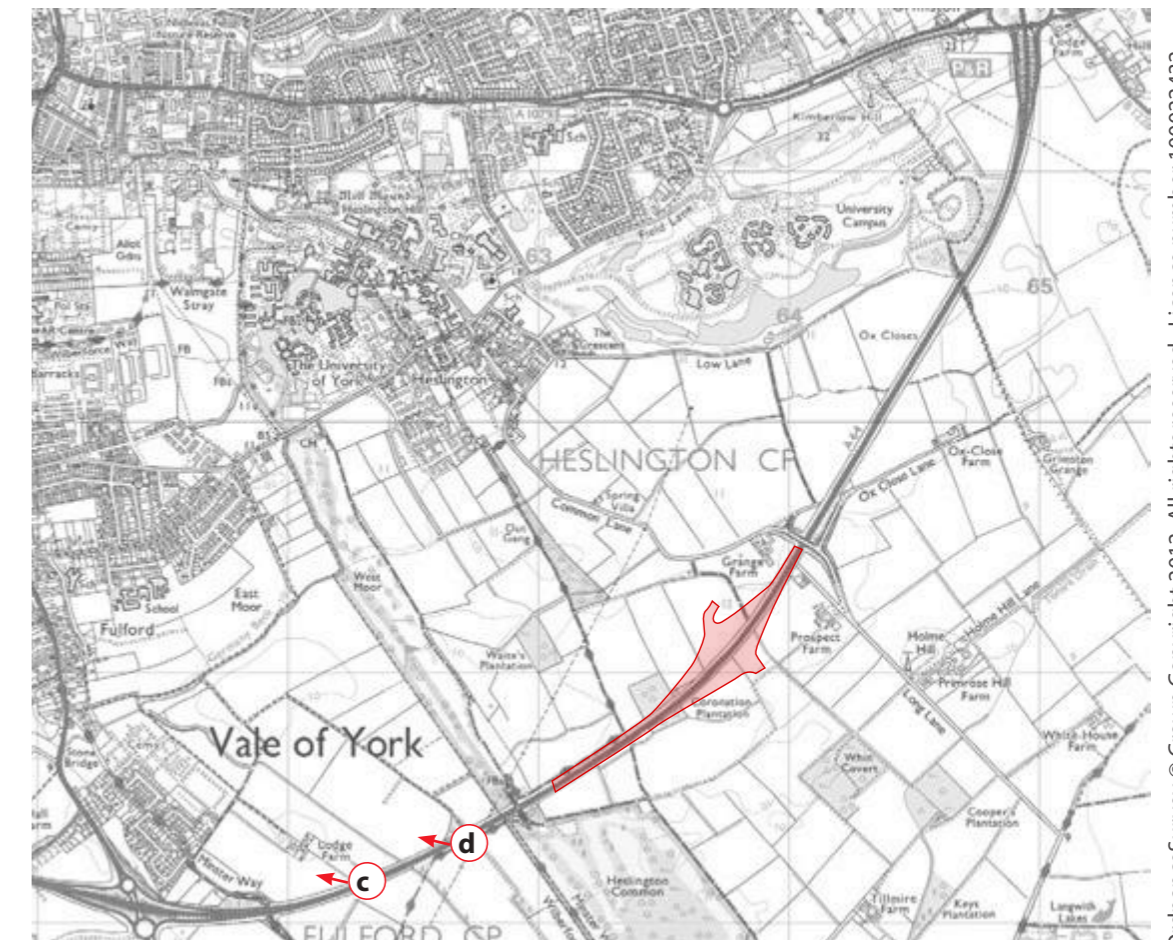


▲ Viewpoint d

SOUTHBOUND

FROM A64 LOOKING NORTHWEST

- Dense bands of mature vegetation line substantial portions of the carriageway, restricting views to the south
- Some longer views north across rural landscape and agricultural buildings towards the historic core and Minster, allowing appreciation of the compact city, set within a rural context.
- These significant views would not be affected by the Proposed Development.



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3.0 Visual Baseline



▲ Viewpoint e



▲ Viewpoint f

NORTHBOUND

FROM A64 LOOKING EAST

- A mix of semi mature-vegetation and mature trees line much of the carriageway within the site, restricting views.
- Occasional glimpse views east, although longer views are curtailed in the middle distance by mature woodland blocks.





▲ Viewpoint g

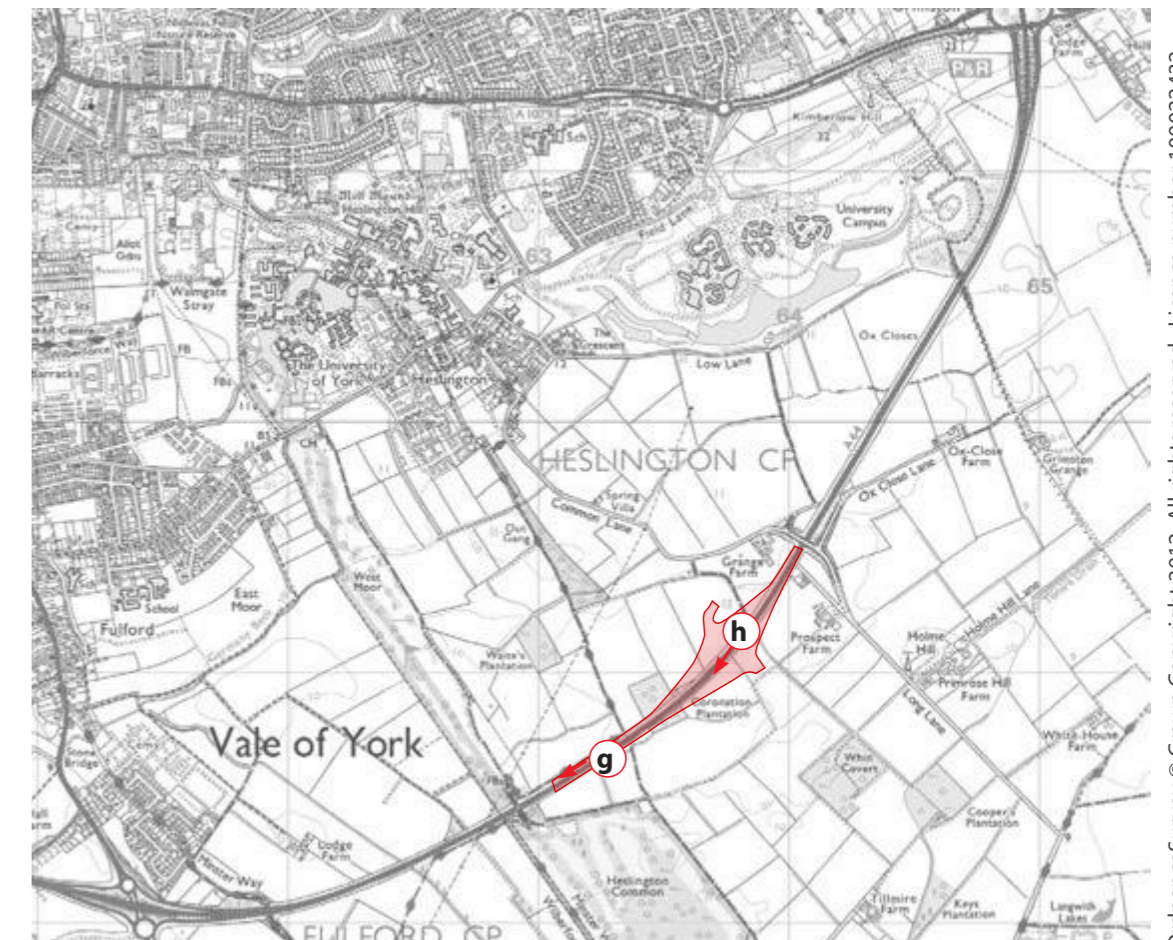


▲ Viewpoint h

SOUTHBOUND

FROM A64 LOOKING SOUTHWEST

- Glimpse longer ranging views can be afforded to the south (Viewpoint h) although they are often curtailed in the middle distance by mature woodland blocks and woodland belts.
- Longer views are contained by vegetation within Fulford Golf Course.
- A mix of semi mature-vegetation and mature tree belts line much of the carriageway within the site, restricting views.



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3.0 Visual Baseline



▲ Viewpoint i



▲ Viewpoint j

NORTHBOUND

FROM A64 LOOKING NORTH EAST

- Extensive views east across open countryside towards the Wolds, allowing an appreciation of the rural setting of York.
- These significant views would not be affected by the proposed development.



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SOUTHBOUND

FROM A64 LOOKING SOUTHWEST

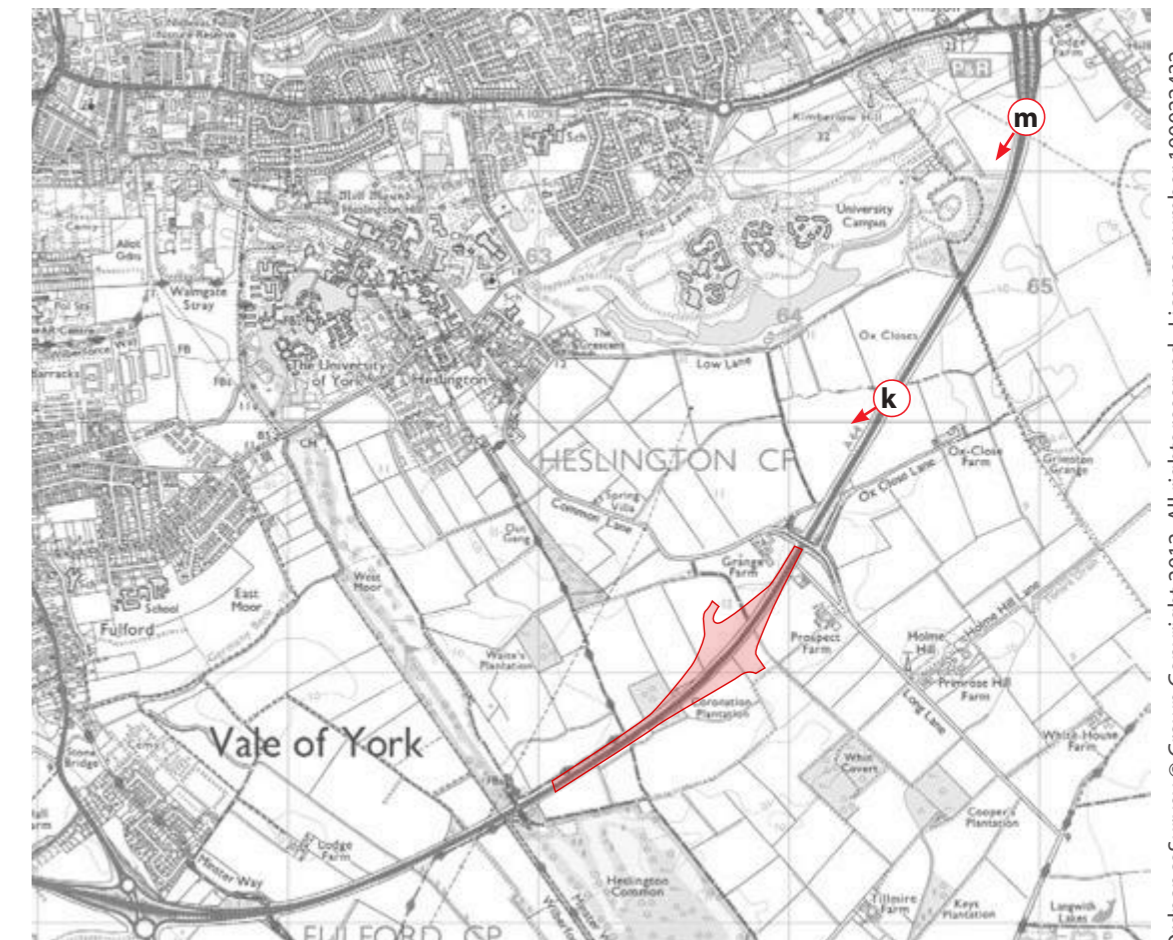
- Views of Heslington and the University campus
- Vegetation located around the bridge crossing of Common Lane/ Long Lane restricts views of the site.
- Middle distance views can be afforded to the north and south although they are often curtailed by mature woodland blocks.
- There are extensive views from the slip road of the roundabout for the A64 with the A1079. These would not be obstructed by the proposed development.



▲ Viewpoint k



▲ Viewpoint m



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The background features a large, abstract geometric shape on the left side, composed of several overlapping rectangular and triangular elements in various shades of green and light green. The shape is partially cut off by the left edge of the frame. The rest of the background is a solid, medium green color.

Conclusions & Recommendations

4.1 ANTICIPATED CUMULATIVE EFFECTS

Cumulative landscape or visual effects are the combined effects that arise through the interaction of two or more developments. There may be cumulative effects between the Proposed Development and the following potential developments, which would require further detailed consideration during design of the junction and approach road:

- Langwith located to the south-east of the A64; and
- Current proposals for the extension of the University to the north.

However, previous landscape and visual appraisal work entitled 'Langwith Garden Village, York - A64 (A19-A1079) Zone of Theoretical Visibility Study' as produced by Barton Willmore (Rev. C dated January 2017) focused on illustrating the visual baseline associated with the visual amenity from the A64 between the junction with the A19 to the south and north as far as the junction with the A1079.

This report demonstrates that parts of the A64, due to its linear nature, are immediately flanked by semi-mature roadside vegetation and mature woodlands belts, which significantly reduce views towards the south-east (i.e. towards Langwith) and the north (i.e. towards the University). It is considered that the distance between the A64 and Langwith to the south-east and the University to the north, helps to reduce the significance of cumulative effects and demonstrates the limited views between these two developments.

4.2 CONCLUSIONS AND RECOMMENDATIONS

Overall, the Site is relatively well screened from the surrounding landscape which is helped by the existing mature and well-established woodland blocks. This restricts the intervisibility of the Proposed Development with the surrounding landscape and limits its effects on the landscape character of the surrounding area. It is considered that with the inclusion of an appropriate landscape scheme, the Proposed Development will have a low effect on the landscape character of areas outside the Site boundary.

Views of York and its rural setting from the site are glimpsed and distant and there are no views of the Minster that would be affected. Occasional views of Heslington Church and the Wolds may be obscured by the proposed junction, but these are glimpsed and their significance is diminished by other structures on the skyline. The remaining character elements to which the landscape contributes would not be significantly harmed.

Construction of the proposed junction would affect the rural character of this part of the A64. However, the site is considered to make limited contribution to the openness of the Green Belt in this location due to the existing influence of the A64 on the character of the site.

Based on the LVA, it is considered that this landscape could accommodate the Proposed Development without significant landscape and visual effects and that the principal characteristics that allow the unique and special historic character of York to be appreciated would not be harmed. In particular, it is also concluded that no significant visual harm to the setting of York would be created based on views from the York Minster, given the extent of the Site forms a limited and minor component part of the overall view out.

At an approximate distance of 4.6km, the Site is not physically discernible due to intervening vegetation and the A64 is not a dominant landscape feature within the view given the expansive nature of the surrounding countryside. This demonstrates that the Proposed Development will not significantly increase the urbanising effect of the A64 corridor.

Careful design of the junction and approach road could ensure the rural character is retained, with appropriate planting to provide views from the new road towards York, enabling an appreciation of the compactness of the historic core within its rural setting.

Any proposed planting scheme should be established to help conserve the rural character and filter views to and from the A64. Design should ensure retention of a proportion of long-distance views from the new road across the rural landscape, and into the city.

It is not considered that any lighting is required as part of the operational requirement of the Proposed Development therefore no conclusions have been made in respect of this.



Appendix A

LANDSCAPE AND VISUAL APPRAISAL METHODOLOGY

1.0 Introduction

The methodology to support a Landscape and Visual Appraisal (LVA) has been based on the following industry best-practice standard guidance:

- Guidelines for Landscape and Visual Impact Assessment, Third Edition. (2013) by the Landscape Institute and Institute of Environmental Management and Assessment, referred to as GLVIA3 within this methodology;
- Advice Note 01/11 - An Approach to Landscape Character Assessment (2014) by Natural England; and
- Photography and photomontage in landscape and visual impact assessment (2011) by the Landscape Institute.

Photography

The photography accompanying the LVA has been produced using the guidance within the Landscape Institute Advice Note 01/11 'Photography and photomontage in landscape and visual impact appraisal' as a basis, to provide a realistic representation of visibility based on those experienced with the naked eye.

2.0 Appraisal Process

Baseline Assessment

A baseline assessment illustrates the landscape context of the Site and is informed by an initial desktop review. This desktop review helps to identify an appropriate and proportionate extent of Study Area along with identifying potential viewpoint locations which are likely to support further assessment within the field. The baseline assessment is compiled from reviewing the following:

- Relevant landscape planning policy;
- Landscape designations;
- National and local landscape character assessments;
- Ordnance Survey mapping; and
- Aerial mapping.

Site Assessment

Following the completion of the desktop study, a site appraisal is carried out to assess potential landscape and visual receptors which may be affected by the development within the Site and provides an opportunity to verify the findings of the baselines assessment.

Landscape and Visual Appraisal

Following a review of the baseline landscape and visual context of the Site and its Study Area along with the site assessment, the appraisal section considers a combination of assessments in relation to the sensitivity of a landscape or visual receptor along with defining the anticipated magnitude of landscape or visual effects. The following Sections 3.0 and 4.0 of this methodology illustrate the distinction between a landscape and a visual receptor and the associated assessment methodology used.

3.0 Landscape Appraisal Methodology

The prediction of landscape effects arising from a Proposed Development within a Study Area is defined by GLVIA3. It states the following steps should be undertaken in order to identify and describe the landscape effects:

- identify the landscape receptors that are likely to be affected by the scheme; and
- identify the interactions between the landscape receptors and different components of the scheme at its different stages.

Landscape receptors are defined by GLVIA3 (page 86: para 5.34) as "components of the landscape that are likely to be affected by the scheme". These can include overall landscape character and key landscape characteristics, individual landscape elements or landscape features and specific aesthetic or perceptual landscape characteristics.

Landscape Sensitivity

The interaction between the different components of a Proposed Development and landscape receptors has potential to result in landscape effects (both adverse and beneficial). Landscape receptors are assessed in terms of their 'landscape sensitivity' based on combined judgements relating to their landscape value and their susceptibility to change. The definition relating to these complex judgements are detailed below.

LANDSCAPE VALUE

Landscape value can be applied to a landscape area, part of a landscape or to individual features within the landscape, which can help to establish the overall landscape character of the Site and the Study Area. It is also important to determine the landscape sensitivity at both Site and Study Area scale.

The value of a landscape receptor is linked to its importance in terms of any designations that may apply, or its importance as a landscape or landscape resource, which may be due to a number of defining criteria. The following criteria have been identified (GLVIA3 page 84, para 5.28) in determining the influence of landscape value:

DEFINING CRITERIA
Landscape quality (condition)
Scenic quality
Rarity
Representativeness
Conservation interests
Recreation value
Perceptual aspects
Associations

An assessment will be made on the landscape value for each landscape receptor and will be informed by the following defining criteria as illustrated in Table 1.

	DEFINING CRITERIA
High	Landscape receptors of international or national importance either by designation or demonstrates a high level of positive attributes as defined in the landscape factors used to assess the value of a landscape. Lacks detracting/ degrading features and has limited opportunity for enhancing existing landscape value.
Medium	Landscape receptors of regional or local importance either by designated or undesignated landscape which illustrates locally importance landscape features with some evidence of detracting/ degrading features. Demonstrates opportunities for enhancing existing landscape value.
Low	Landscape receptors which lack designations and does not demonstrate significant locally important landscape features or demonstrates a low level of positive attributes as defined in the landscape factors used to assess the value of a landscape. High level of detracting/ degrading features

Table 1: Landscape Value Criteria

Appendix A

LANDSCAPE SUSCEPTIBILITY TO CHANGE

Landscape susceptibility to change is the ability of the landscape (overall landscape character area/ type or individual landscape element or landscape feature) to “accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies” (GLVIA3 page 89: para 5.40). The criteria level in relation to landscape susceptibility to change is illustrated in Table 2.

	DEFINING CRITERIA
High	The landscape receptor is a highly distinctive and cohesive landscape and/or with high value characteristics or features and is essentially intact and in a very good condition with very few detracting or visually intrusive elements. Is likely to have a strong landscape pattern/ texture. The landscape receptor has a limited capacity to accommodate the type of change or proposed development without effecting its overall integrity.
Medium	The landscape receptor is distinctive, represents common landscape characteristics and in a very reasonable condition with some detracting or visually intrusive elements. Is likely to have a landscape pattern which is mostly intact. The landscape receptor has some capacity to accommodate the type of change or proposed development without effecting its overall integrity.
Low	The landscape receptor is likely to be simple, possibly with a mixed character and or monotonous with indistinct features. Landscape lacking coherence and includes detracting or visually intrusive elements, with landscape features which may be in poor or improving condition and few which could not be replaced. Is likely to have a minimal variation in landscape pattern. The landscape receptor is robust and has a greater capacity to accommodate the proposed development without effecting its overall integrity.

Table 2: Landscape Susceptibility to Change Criteria

OVERALL LANDSCAPE SENSITIVITY

By combining Landscape Susceptibility to Change together with Landscape Value, an overall landscape sensitivity can be demonstrated. However, a combination of ‘high’ landscape susceptibility and ‘high’ landscape value is likely to demonstrate the highest landscape sensitivity, whereas a ‘low’ landscape susceptibility and a ‘low’ landscape value is likely to demonstrate the lowest level of landscape sensitivity. A summary of the defining criteria relating to the different levels of sensitivity is illustrated in Table 3.

	DEFINING CRITERIA
High	Areas of landscape character that are highly valued for their scenic quality (including most statutorily designated landscapes); and/or Elements/features that could be described as unique; or are nationally scarce; or mature vegetation with provenance such as ancient woodland or mature parkland trees. Mature landscape features which are characteristic of and contribute to a sense of place and illustrates time-depth in a landscape and if replaceable, could not be replaced other than in the long term.
Medium	Areas that have a positive landscape character but include some areas of alteration/degradation/ or erosion of features; and/or Perceptual/aesthetic aspects has some vulnerability to unsympathetic development; and/or Features/elements that are locally commonplace; unusual locally but in moderate/poor condition; or mature vegetation that is in moderate/poor condition or readily replicated.
Low	Areas that are relatively bland or neutral in character with few/no notable features; and/or A landscape that includes areas of alteration/degradation or erosion of features; and/or Landscape elements/features that are common place or make little contribution to local distinctiveness.
Very Low	Damaged or substantially modified landscapes with few characteristic features of value, capable of absorbing major change; and/or Landscape elements/features that might be considered to detract from landscape character such as obtrusive man-made artefacts (e.g. power lines, large scale developments, etc.).

Table 3: Landscape Sensitivity Criteria

Magnitude of Landscape Effects

The Magnitude of Landscape Effects illustrates the degree of change to a landscape receptor in terms of its size or scale of the change, the geographical extent of the area which is impacted by the change and its duration and the ability to reverse the change. Table 4 sets out the categories and criteria adopted in respect of the separate considerations of Scale or Size of the Degree of Change.

SCALE OR SIZE OF THE DEGREE OF LANDSCAPE CHANGE

	DEFINING CRITERIA
High	Total or substantial loss or large-scale damage to landscape characteristics/ features and the introduction of new uncharacteristic elements resulting in the integrity of the landscape being compromised. Overall landscape receptor will be fundamentally changed.
Medium	Partial loss or medium scale damage to landscape characteristics/ features and the introduction of new elements but not necessarily uncharacteristic resulting in a partial change to the element/feature which may in some cases diminish its overall integrity. Overall landscape receptor will demonstrate obvious change.
Low	Limited or a slight loss or small-scale damage to landscape characteristics/ features and the introduction of new elements which are characteristic of the surrounding landscape, with its integrity remaining unchanged. Overall landscape receptor will demonstrate some change.
Negligible	Very minor loss or alteration to one or more key landscape characteristics/ features and the introduction of new elements which are characteristic of the surrounding landscape. Overall landscape receptor illustrates minimal change.
None	No loss or alteration to any key landscape characteristics/ features within the site. Overall landscape receptor remains unchanged.

Table 4: Landscape Size/Scale Criteria

The assessment of a landscape receptors ability to respond to Scale or Size of the Degree of Change provides us with an opportunity to summarise the overall magnitude of change for each receptor. The overall magnitude of change for landscape receptors can be interpreted as per Table 5.

	DEFINING CRITERIA
High	Introduction of incongruous development which would result in noticeable change over an extensive area, affecting many key characteristics and the experience of the landscape.
Medium	Introduction of uncharacteristic development which would result in noticeable change over a large area, or more intensive change over a limited area, affecting some key characteristics and the experience of the landscape.
Low	Introduction of development that is not uncharacteristic which would result in a small change over a limited area affecting few characteristics.
Very Low	Little perceptible change to the landscape characteristics.

Table 5: Overall Landscape Magnitude of Change Criteria

4.0 Visual Appraisal Methodology

Sensitivity of Viewpoints

The sensitivity of a visual receptor is based on a number of complex issues which should be evaluated as part of an LVA and can be defined as their Visual Susceptibility to Change.

VISUAL SUSCEPTIBILITY TO CHANGE

The susceptibility of a visual receptor is dependent on the following:

- their susceptibility to changes in the view and visual amenity;
- their perceived value attached to the view;
- its relationship to a activity they are engaged in; and
- the extent to which their attention is focussed on the views and visual amenity at that location.

As such those visual receptors most sensitive to change are likely to include people engaged in outdoor activities where an appreciation of the landscape is the focus or residents in areas where the landscape setting contributes to the setting of the properties.

Conversely, those considered least sensitive to change include (but are not restricted to) people engaged in outdoor sports or recreation where there is no focus on the surrounding landscape/views and people at their place of work where their focus is on their work activity.

Appendix A

The overall susceptibility to change for visual receptors can be interpreted as per Table 6.

	DEFINING CRITERIA
High	Residents at home with primary views from ground floor, garden and upper floors; Public rights of way and footpaths (either strategic or popular routes) where people are engaged in outdoor recreation, whose attention/interest is likely to be focused on the landscape or particular views; Visitors to heritage assets or other attractions, where views of the surroundings are an important contributor to the experience; Communities where views contribute to the landscape setting enjoyed by residents; Travellers on recognised scenic routes.
Medium	Residents with secondary views, primarily from first floor level; Travellers on road, rail, or other transport routes where landscape is a focus of the view; Users of local, and less used Public Rights of Way or where the attention is not focused on the landscape; Schools and other institutional buildings and their outdoor areas, play areas.
Low	Users of outdoor sport/recreation facilities which does not involve/depend upon appreciation of views of the landscape; Travellers on road, rail or other transport routes not focused on the landscape/particular views e.g. on motorways and "A" road or commuter routes; People at their place of work whose attention may be focused on their work/activity and not their surroundings.

Table 6: Visual Susceptibility to Change Criteria

VALUE OF VIEWS

The value of a view should consider the following:

- recognition attached to the value of a particular view, e.g. in relation to heritage assets or planning designations; and
- indicators of the value attached to views by others, e.g., in guide books, defined viewpoints tourist maps, literary references, art work etc.

An assessment will be made on the value of a view and will be informed by the following defining criteria as illustrated in Table 7 below.

	DEFINING CRITERIA
High	A unique or recognised high-quality view, well- frequented and/or promoted as a beauty spot/visitor destination as often illustrated on Ordnance Survey maps. A view with cultural associations (recognised in art, literature or other media). A view which relates to the experience of other features, for example heritage assets.
Medium	May be valued locally however it is not widely recognised for its quality or has low visitor numbers. The view has no strong cultural associations.
Low	A view with no recognised quality, is unremarkable and/or is unlikely to be visited specifically to experience the views available.

Table 7: Value of View Criteria

OVERALL VISUAL SENSITIVITY

By combining overall susceptibility to change together with the value of a view, an overall visual sensitivity can be demonstrated. It is generally the case that a combination of high susceptibility and high value is most likely to give rise to the highest sensitivity. Conversely, a low susceptibility and low value is most likely to give rise in the lowest level of visual sensitivity. A summary of the defining criteria illustrating the overall visual sensitivities is illustrated below within Table 8.

	DEFINING CRITERIA
High	A view that is well balanced, containing attractive features and notable for its scenic quality; and/or A view which is an important part of their reason for being there; and/or A view which is experienced by large numbers of people and/or is recognised for its qualities.
Medium	An otherwise attractive view that includes some unattractive or discordant features, or visual detractors; and/or A view which plays a small part in receptors being there; and/or A view that is recognised locally.
Low	A view that is unattractive, discordant and/or contains many visual detractors; and/or A view which is unlikely to be part of the receptor experience.

Table 8: Overall Visual Sensitivity

Magnitude of Visual Effects

The guidance provided in GLVIA3 (page 115: para 6.38) requires that each of the following variable need to be evaluated for each of the visual effects identified:

- size or scale of the change of view, including loss of or additional views, degree of contrast in terms of form, mass, scale, colour and texture etc;
- geographic extent in terms of angle of view, distance etc; and
- duration and reversibility in term of longevity of effects and whether reversible.

The size and scale of an effect is determined by considering the amount of change experienced by a receptor, based upon the criteria set out in Table 8.

	DEFINING CRITERIA
High	The development, or a part of it would give rise to an effect that would fundamentally change or would become the dominant and contrasting feature or focal point in the view. Little or no scope for adequate mitigation.
Medium	The development, or a part of it would give rise to an effect that would markedly change or would form a prominent feature or element of the view which is readily apparent to the receptor. in the view; and/or Partial mitigation is possible.
Low	The development, or a part of it would give rise to an effect that would create limited or localised changes to the existing view and would be noticeable but not alter the overall balance of features and elements that comprise the existing view Partial or full mitigation is possible.
Very Low	Only a very small part of the development would be discernible with very little change, or it is at such a distance that it would form a barely noticeable feature or element of the view and/or occupy a negligible proportion of the view. Full mitigation is possible.

Table 8: Visual Magnitude Criteria







Appendix B

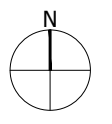
PROPOSED ILLUSTRATIVE LAYOUT



The scaling of this drawing cannot be assured
 Revision _____ Date _____ Drn _____ Ckd _____

-  New area of native species woodland
-  Existing hedge
-  Existing trees
-  Proposed trees

DRAFT



Project
 Land West of Elvington Lane

Drawing Title
 Proposed access road
 Indicative sketch

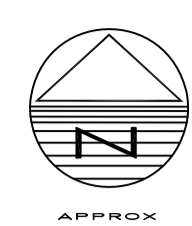
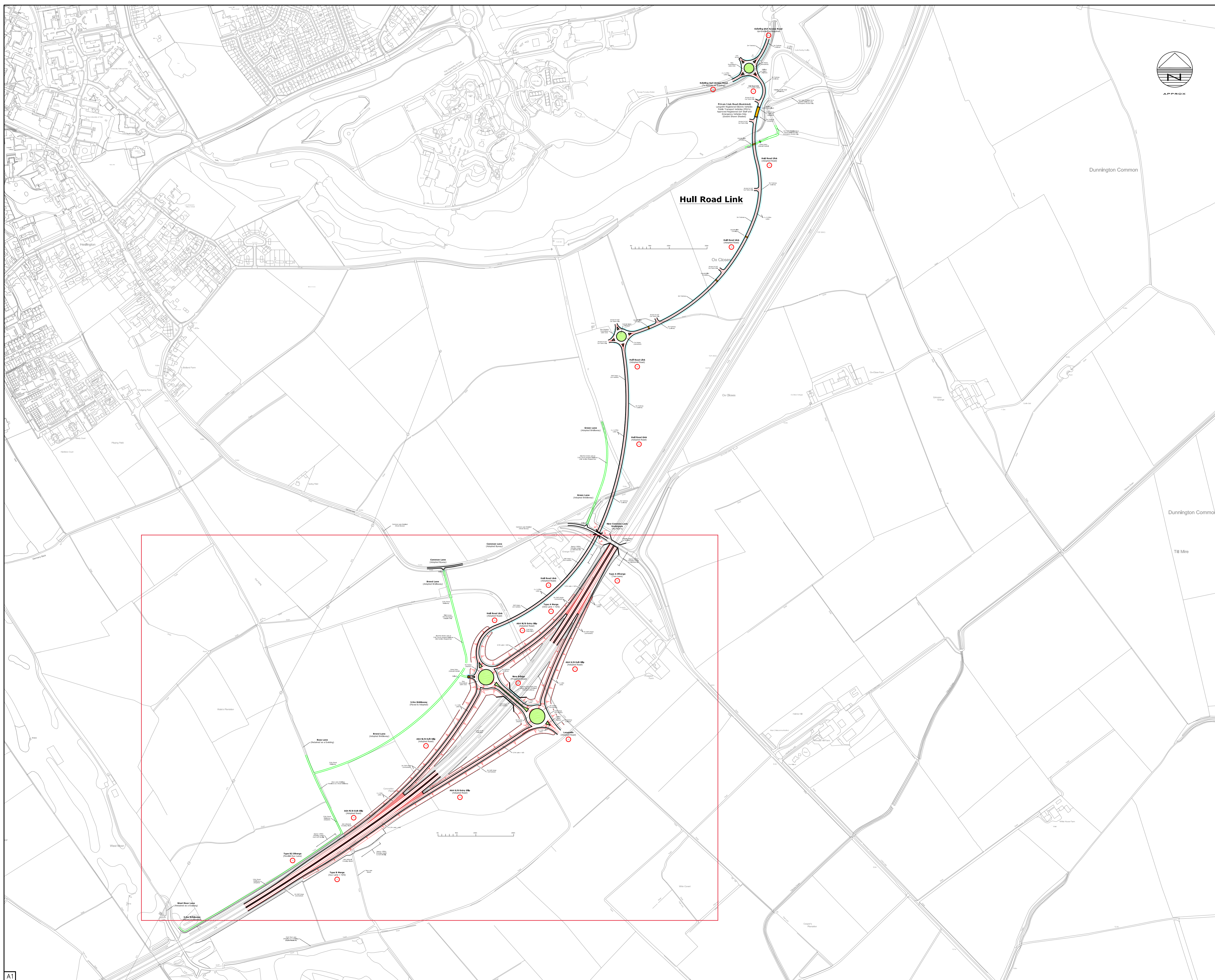
Date 28.11.16	Scale NTS	Drawn by KU	Check by MV
Project No 23190	Drawing No 9932	Revision A	



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 Environmental & Sustainability Assessment • Graphic Design

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NOTES

1. DO NOT SCALE THIS DRAWING. ALL DIMENSIONS MUST BE CHECKED/ VERIFIED ON SITE. IF IN DOUBT ASK.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT ARCHITECTS, ENGINEERS AND SPECIALISTS DRAWINGS AND SPECIFICATIONS.
3. ALL DIMENSIONS IN MILLIMETRES UNLESS NOTED OTHERWISE. ALL LEVELS IN METRES UNLESS NOTED OTHERWISE.
4. ANY DISCREPANCIES NOTED ON SITE ARE TO BE REPORTED TO THE ENGINEER IMMEDIATELY.

KEY

Rev	Date	Description	Drawn
D3	18.11.16	LAYOUT REVISED	SPJ
D2	17.08.16	SLIP ROADS AMENDED	SPJ
DT	22.01.16	ISSUED FOR USE	SPJ

AMENDMENTS			
Rev	Date	Description	Drawn

LAWRENCE WALKER LIMITED
 CHURCH FARM
 LEAMINGTON
 HASTINGS
 WARCS
 CV23 8DZ

Client
 SANDBY LIMITED
 OAKGATE PLC

Project Title
 LANGWITH
 (ALLOCATION ST15)

Drawing Title
**A64 SITE ACCESS
 GENERAL
 ARRANGEMENT
 (Sheet 1 of 3)**

Scale As Noted	Date 22.01.16	Drawn by SPJ
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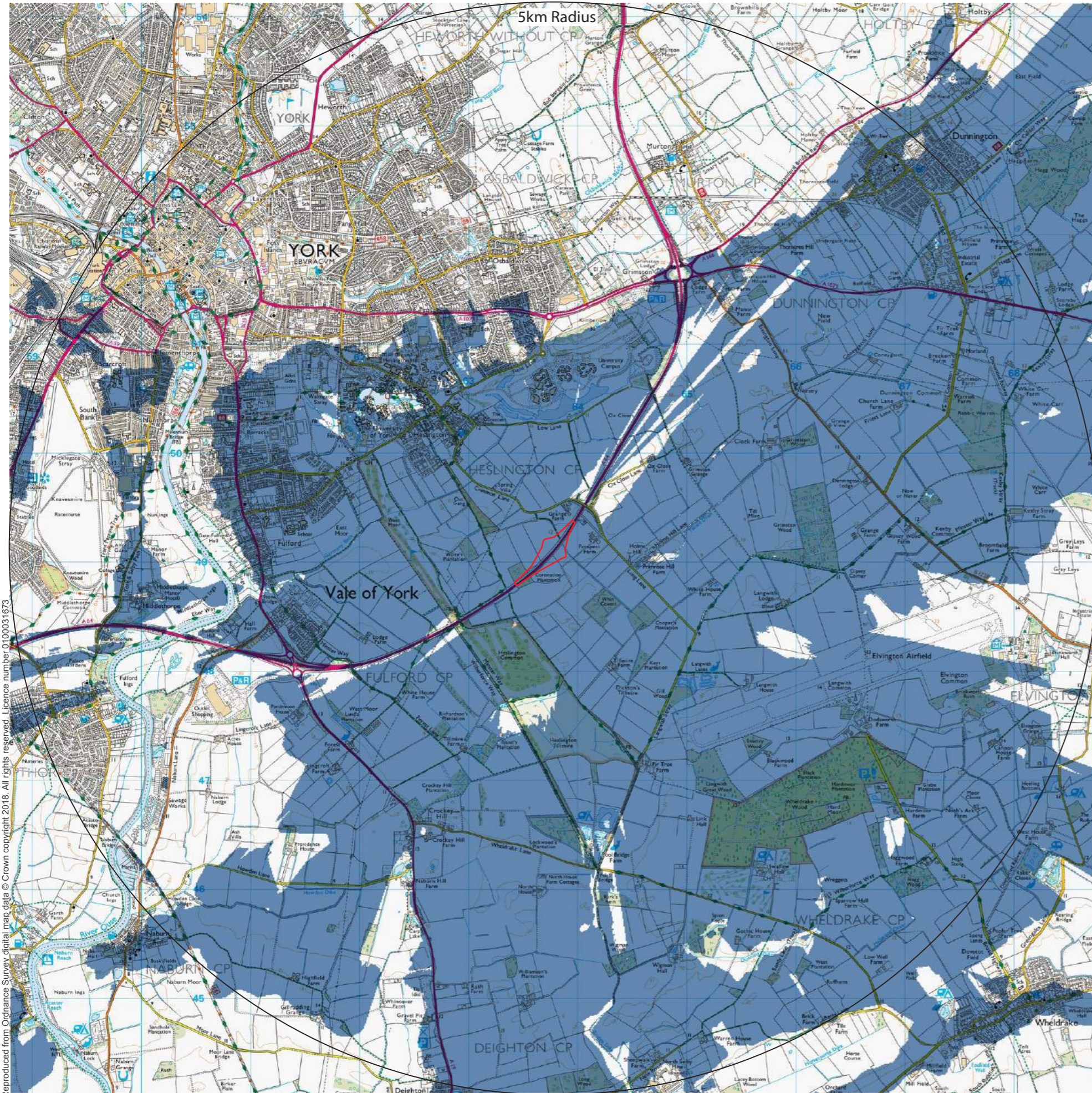
Drawing Status
 Draft Local Plan

Drawing No: LWL/670/001	Revision D3
----------------------------	----------------

A large, stylized number '3' is positioned on the left side of the page. It is composed of two overlapping, semi-transparent light green shapes: a larger circle on the left and a smaller, slightly offset circle on the right, creating a 3D effect. The background is a solid, vibrant green.

Appendix C

ZONE OF THEORETICAL VISIBILITY MAPPING



Key:



Site location



Theoretical visibility of proposed road junction

Layout Information

Site Layout A64 Site Access General Arrangement by Lawrence Walker Ltd Dwg No LWL/670/002 D3

The terrain data used is 1m LiDAR DTM (EA) data for the central 4x4km and Ordnance Survey Terrain 5 for the full 10 x 10km study area. Viewer height used - 1.60m.

The visibility mapping is calculated using a roundabout height of 7m.

This ZTV does not include the screening effects of buildings or vegetation in the study area.

The calculation takes into account the effects of the curvature of the earth and light refraction.

Scale:



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Appendix C

Zone of Theoretical Visibility

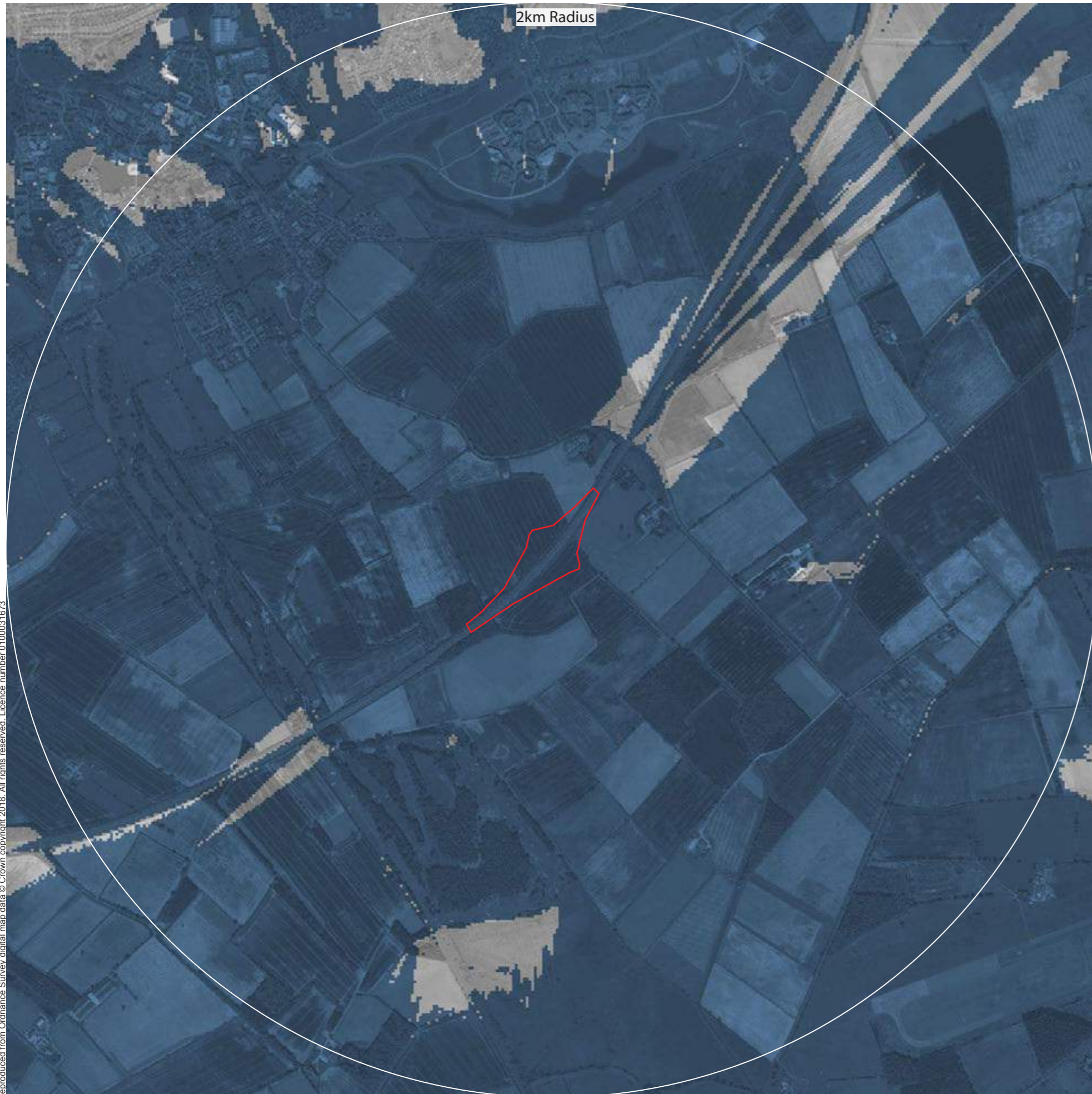
Proposed A64 Road Junction - Bare Earth

Langwith (Allocation ST15)

SCALE: As Shown DRAWING NO: 1147.2-01 CHECKED BY: EH
 REV: / DRAWN BY: MS DATE: 16.03.2018

Landscape and Visual Assessment





2km Radius

Key:



Site location



Theoretical visibility of proposed road junction

Layout Information

Site Layout A64 Site Access General Arrangement by
Lawrence Walker Ltd Dwg No LWL/670/002 D3

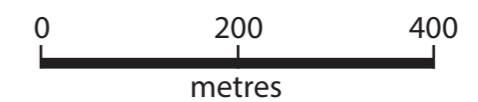
The terrain data used is 1m LiDAR DTM (EA) data for the central 4x4km and Ordnance Survey Terrain 5 for the full 10 x 10km study area. Viewer height used - 1.60m.

The visibility mapping is calculated using a roundabout height of 7m.

This ZTV does not include the screening effects of buildings or vegetation in the study area.

The calculation takes into account the effects of the curvature of the earth and light refraction.

Scale:



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Appendix C Zone of Theoretical Visibility Proposed A64 Road Junction - Bare Earth

SCALE: As Shown DRAWING NO: 1147.2-01 CHECKED BY: EH
REV: / DRAWN BY: MS DATE: 16.03.2018

Langwith (Allocation ST15)
Landscape and Visual Assessment





Key:



Site location



Theoretical visibility of proposed road junction

Layout Information

Site Layout A64 Site Access General Arrangement by
Lawrence Walker Ltd Dwg No LWL/670/002 D3

The terrain data used is 1m LiDAR DTM (EA) data for the central 4x4km and Ordnance Survey Terrain 5 for the full 10 x 10km study area. Viewer height used - 1.60m.

The visibility mapping is calculated using a roundabout height of 7m.

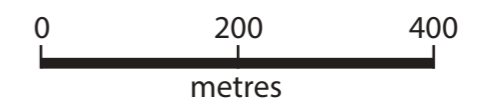
This ZTV includes the screening effects of buildings and vegetation across the study area. Field survey identified the following typical heights:

Dwellings (2 storey)	8.5m
University accommodation (Heslington East)	15m
Woodland	12m
Hedgerows(Managed)	1.5m
Hedgerows(Unmanaged)	2.5m

These features have been digitised from hi-res aerial photography and extruded to the correct height, to illustrate the effects of the visual buffers in reducing visibility within the detailed study area.

The calculation takes into account the effects of the curvature of the earth and light refraction.

Scale:



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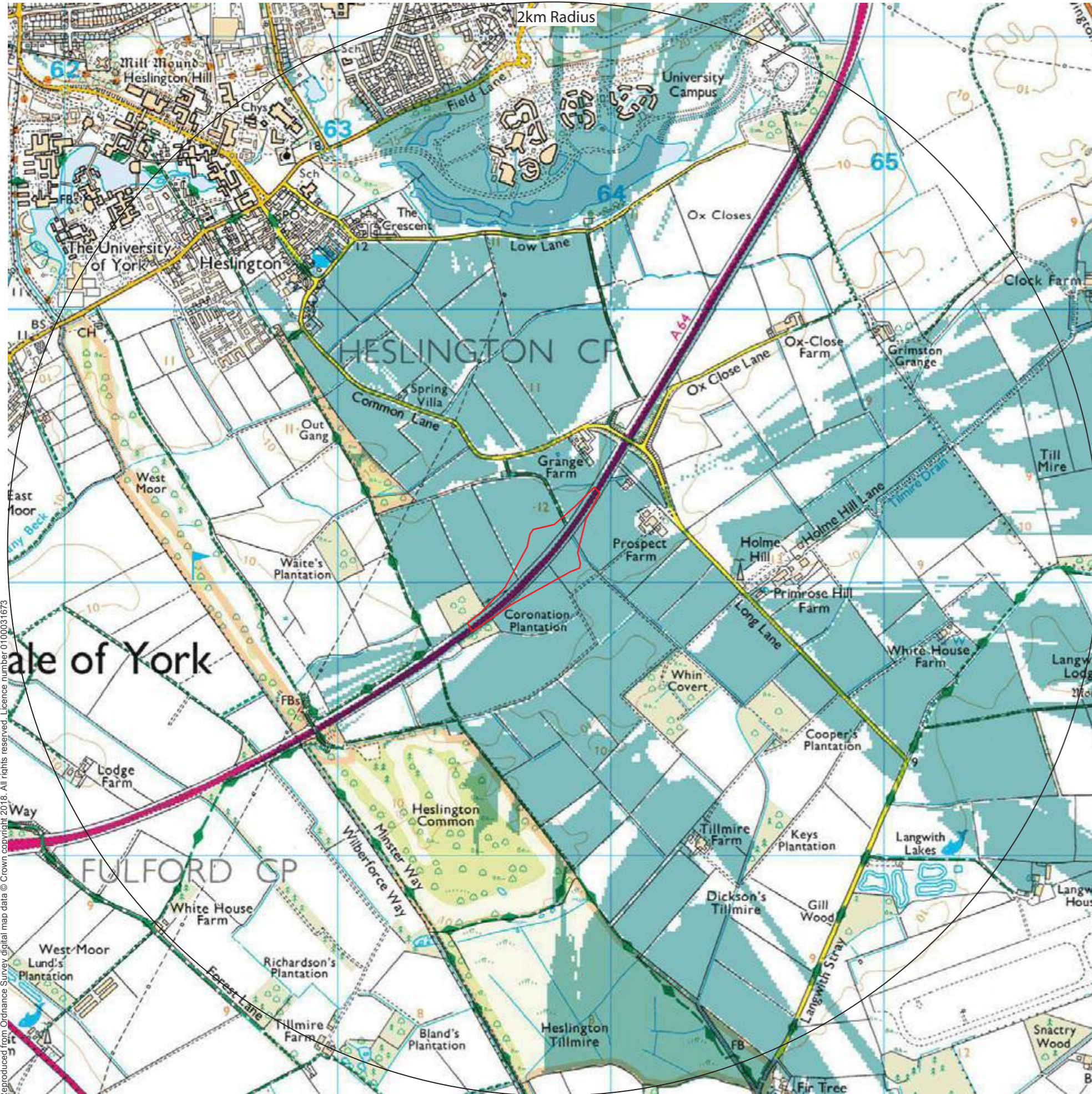
Appendix C Zone of Theoretical Visibility Proposed A64 Road Junction - Visual Buffers

SCALE: As Shown DRAWING NO: 1147.2-01 CHECKED BY: EH
REV: / DRAWN BY: MS DATE: 16.03.2018

Langwith (Allocation ST15)

Landscape and Visual Assessment





Key:



Site location



Theoretical visibility of proposed road junction

Layout Information

Site Layout A64 Site Access General Arrangement by Lawrence Walker Ltd Dwg No LWL/670/002 D3

The terrain data used is 1m LiDAR DTM (EA) data for the central 4x4km and Ordnance Survey Terrain 5 for the full 10 x 10km study area. Viewer height used - 1.60m.

The visibility mapping is calculated using a roundabout height of 7m.

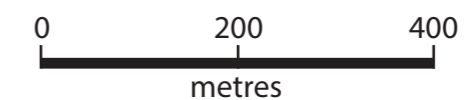
This ZTV includes the screening effects of buildings and vegetation across the study area. Field survey identified the following typical heights:

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The calculation takes into account the effects of the curvature of the earth and light refraction.

Scale:



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Appendix D

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APPENDIX 6

HERITAGE SUMMARY



FAS
HERITAGE

LANGWITH (REG 19, 2018)

YORK

HERITAGE SUMMARY

REPORT
v1.0
MARCH 2018

HERITAGE SUMMARY
LANGWITH (REG 19, 2018)
YORK

SITE CODE: YLW18
REPORT CODE: FAS2018 731 YLW719
NGR: SE 6637 4831

March 2018
v1.0

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1.0 INTRODUCTION

This document presents a summary of the potential heritage impact of a proposed allocation and development of a new settlement site to the southeast of the City of York (Local Plan ST15 with revised boundary, hereafter referred to as Langwith (Reg 19, 2018)). This summary assessment has been prepared by FAS Heritage, on behalf of Sandby (York) Ltd and Oakgate/Caddick Group, March 2018.

Throughout, ST15 is used to refer to the Local Plan draft allocation, and Langwith to the proposed revised boundary.

2.0 PREVIOUS ASSESSMENT WORK

2.1 EXISTING REPORTS

Heritage assessment work has been ongoing since 2013, and consideration of the potential impact of a settlement in this part of York has been set out in the following documents, plus various responses and comments received by Historic England:

Whinthorpe ST15 (2013 Preferred Options Local Plan) boundary: 2013-2015

- Heritage Impact Assessment (FAS 2014)
- Archaeological Desk-Based Assessment (FAS 2014, updated 2015)
- Archaeological Strategy (FAS 2014)
- Archaeological Evaluation (Geophysical Survey)(ASWYAS and GSB 2014)
- Archaeological Trial Trenching (FAS 2014)
- Archaeological Test Pitting (FAS 2015)

Langwith (Reg 18, 2016) and (Reg 18, 2017): 2016-2017

- Heritage Statement (FAS 2016) – summarising heritage and archaeological impact
- Updated Heritage Assessment (FAS March 2017)
- Outline Visual Appraisal (Sandby 2017)
- Heritage Assessment Summary: Response to Historic England comments of March 2017 (FAS May 2017)

ST15 (Reg 19, 2018)

- City of York Council (CYC) Heritage Impact Appraisal: Pre-Publication (Reg 18 Consultation) Draft (CYC September 2017)

Langwith (Reg 19, 2018)

- The current document updates the conclusions of previous reports to consider the potential impact of the development of Langwith, in the light of the potential impacts raised in these previous documents and the responses to them.

2.2 LEGAL FRAMEWORKS AND PLANNING GUIDANCE

This report, and the assessments set out above, aim to address the requirements of relevant legal frameworks and planning policy pertinent to the site and its proposed development. The following apply:

National and Regional Planning Framework

- Ancient Monuments and Archaeological Areas Act, 1979
- Town and Country Planning (Listed Buildings and Conservation Areas) Act, 1990
- National Planning Policy Framework (DCLG 2012)

Guidance

- National Planning Policy Guidance (NPPG)
- Chartered Institute for Archaeologists (CIfA) 2015 (now updated 2017) Standard and Guidance for Historic Environment Desk-Based Assessment
- Historic England, 2015 (now updated 2017). Good Practice Advice in Planning Note 3: The Setting of Heritage Assets
- Historic England, 2015. Good Practice Advice in Planning Note 1: The Historic Environment in Local Plans
- Historic England, 2015. The Historic Environment and Site Allocations in Local Plans - Advice Note 3
- City of York Council, 2014. *Heritage Topic Paper*, which sets out the principal characteristics of the historic City of York.

2.3 PREVIOUS ASSESSMENT OF IMPACT

Assessment of above and below-ground heritage has been undertaken with reference to the six principal characteristics of the historic city of York, as set out in the *CYC Heritage Topic Paper* (2014), being: strong urban form; compactness; landmark monuments; architectural character; archaeological complexity; landscape and setting. The *Heritage Topic Paper* sets out in detail a series of character elements that contribute to each of the special characteristics.

Previous assessment work for Langwith has explored the contribution that this part of York's historic landscape makes to each of the six characteristics, in terms of the broader characteristics and their elements. Development in the area could potentially affect five out of the six principal characteristics, *ie* all but strong urban form, which would not be affected.

Previous assessment work is not reiterated in this document, but the key conclusions regarding potential impact of Langwith on each of the six principal characteristics of York is set out below in Section 3.0.

3.0 ASSESSMENT OF IMPACT ON THE PRINCIPAL CHARACTERISTICS

Each of the principal characteristics is considered in turn below. A brief outline of the characteristic is followed by a summary of the contribution that the area currently makes to that characteristic; the ways that development could potentially affect that characteristic; an assessment of potential impact of the proposed development of Langwith, with reference to the Masterplanning and Place-making Vision (Barton Willmore, 2018) where appropriate. Where specific character elements are discussed, these are highlighted in bold text.

3.1 STRONG URBAN FORM

The site of the proposed development lies away from the urban core of York and makes no contribution to the characteristic of strong urban form. Neither ST15 nor Langwith would have an impact on this characteristic or its character elements.

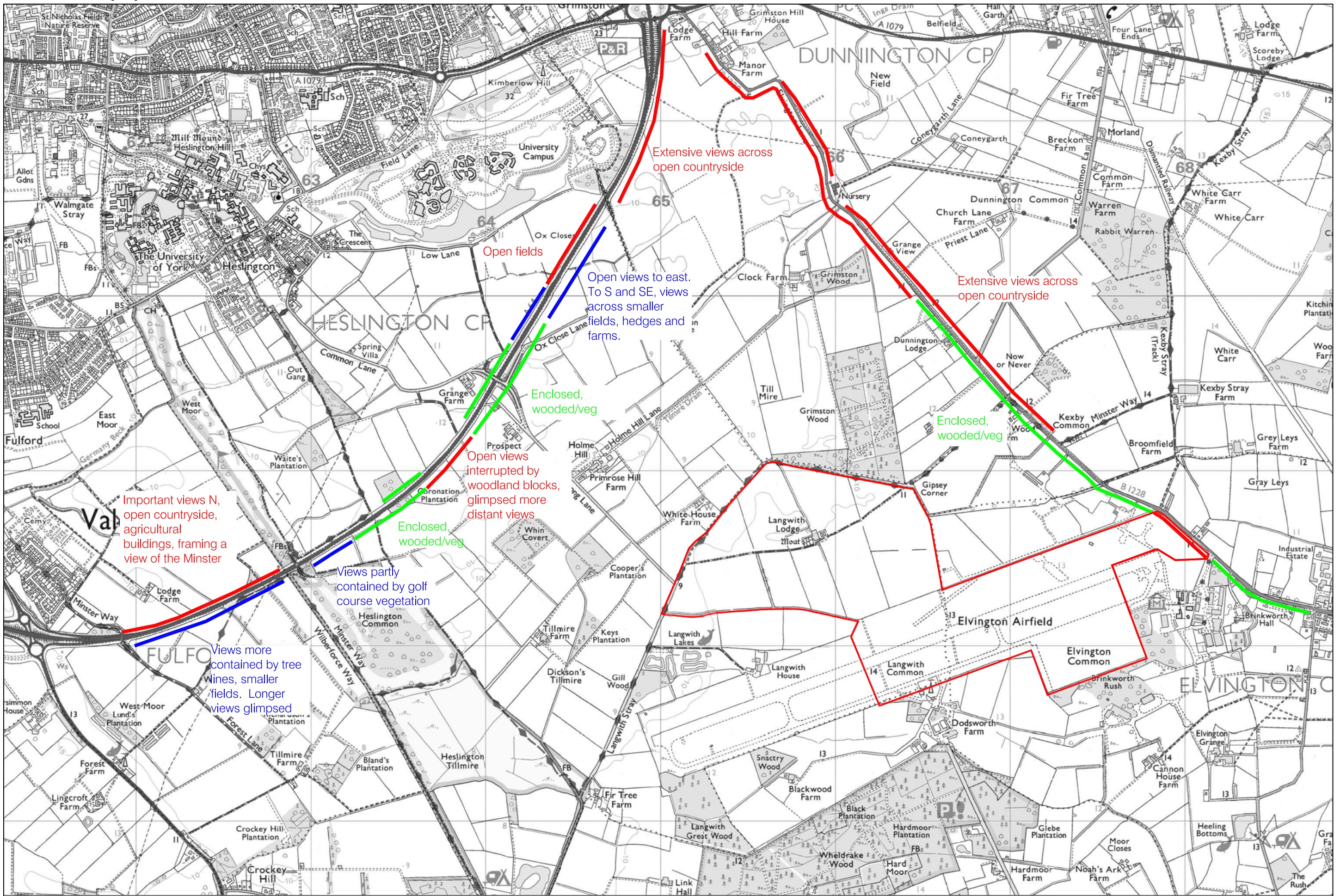
3.2 COMPACTNESS

The City of York comprises a dense central core (**contained concentric form**) with outlying settlements, each of which retains its own identity. The ring road, beginning with the A64 in the 1970s and completed on the northern side in the 1980s, has effectively contained the form of the city, with outlying villages situated at regular intervals around. The topography of the city enhances this characteristic (**flat terrain and views**); each settlement rises separately from the plain of the Vale of York, and the low-lying setting facilitates long views in and out of the core.

3.2.1 Contribution of the area to compactness characteristic

Land to the southeast of the A64 in this part of York forms part of the low-lying setting of the city and contributes to the characteristic of compactness, providing the agricultural setting of dispersed settlements around the central core, and with some long distance, glimpsed views towards the Minster.

Appreciation of this characteristic is best achieved from the ring road, where the landscape opens out to either side of the road, providing a sense of travelling through the rural fringe around the compact central core. As the ring road passes north of the proposed development site, there are stretches of the route where open land extends in both directions, providing a strong impression of a rural hinterland. Elsewhere, plantations, hedges and wooded bridge embankments create a more enclosed (but still verdant) experience. This changing experience is expressed on Figure 1, also set out in the A64 Proposed Junction Landscape and Visual Appraisal (LVA)(Landscape Agency 2018, Section 3.5). North of the proposed development site, the University of York Heslington East Campus has started to encroach into the green space within the A64, but a swathe of land retains a sense of rural character to the immediate northeast of the road extending to the edge of the city.



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Character of views from the A64 and Elvington Lane

Scale 1:20000



Figure 1

3.2.2 Areas of potential impact on compactness

Development in this area of York could potentially affect the perception of the compact form of York, the pattern of dispersed settlement in the surrounding landscape, and ability to appreciate the relationship between the city with its wider hinterland. The 2017 CYC HIA relating to ST15 identifies areas of potential harm as *perceived impact on compactness* and *impact on views to the city* by providing an alternative focus.

3.2.3 Potential impact of Langwith (Reg 19, 2018) on compactness

The impact of a new development on the perceived compactness of the city has been discussed in previous assessments (FAS May 2017), and further explored in an Outline Visual Appraisal prepared in March 2017.

The proposed development would be a standalone development set away from the city and would be recognisable as such when viewed from the ring road. The northern boundary would lie c.1.9km from the outer edge of the city, as represented by the University of York. From the ring road (minimum 1.4km from development), the visual appraisal demonstrated that the settlement would appear distant and small scale, set against the backdrop of plantations that merge to create a consistent feature of the horizon in this area. From most of the ring road, the settlement would be screened at least in part by existing hedgerows and plantations which would further reduce visual impact. On travelling south from the ring road on Elvington Lane, there would be a notable distance between the roundabout and new settlement which would reinforce this separation.

The associated infrastructure required for Langwith (Reg 19, 2018) - a junction off the A64, access road to Langwith and possible University link road - would represent new features within the landscape. The impact of the junction is further set out in the accompanying Landscape and Visual Appraisal (Landscape Agency 2018). The proposed junction would represent an addition to existing bridges and junctions on the A64, and would change some views along this route. This would not, however, alter perception of the compact core and surrounding villages.

A linking road to the University of York could affect the quality of views towards the rural fringe of the city, and with the development of ST27 therefore has the potential to erode this aspect of the setting of the city. Retention of a tract of agricultural land would be key to retaining the perception of a rural fringe around compact core; any proposed connection with the university would require careful design and minimal lighting and associated features in order to retain the sense of the city's concentric form.

Views to and from the city

The Landscape and Visual Appraisal (Landscape Agency 2018) considers views to and from the city. This area of impact is considered in more detail below, in terms of Landmark Monuments.

3.3 LANDMARK MONUMENTS

York contains a large number of buildings of high cultural significance which are highly visible within the fabric of the city. These draw attention and punctuate the skyline, acting as markers within the city. The signature building of York is the Minster, identified in the *Heritage Topic Paper* as a symbol of common identity which dominates the skyline.

3.3.1 Contribution of the area to Landmark Monuments characteristic

No landmark monuments are identified within the ST15 or Langwith (Reg 19, 2018) boundaries, and no key views of landmark monuments have been identified within the proposed development area.

York Minster (Grade I Listed) can be seen in the distance from the Minster Way to the southwest of the proposed Habitat Enhancement Area (HEA), in conjunction with the spire of Heslington Anglican and Methodist Church (formerly St Paul's)(Grade II Listed)(Plate 1). This view contributes to the 'Landmark monuments' characteristic by providing the context from which **physical and temporal markers** can be experienced. The Minster is the iconic marker on the York horizon and distant views provide those approaching or circumnavigating the city with the impression of the cathedral city situated within the open landscape of the Vale of York. The views from the proposed site are glimpsed, long distance views, and the scale of the Minster is diminished by other structures on the skyline; as such, this view is of minor significance, although the cumulative significance of these glimpsed views makes a contribution to this characteristic of York.



Plate 1 View towards the Minster from Langwith Stray/Minster Way

The Heritage Assessment (2016) considered the potential impact of development on other designated heritage assets within the surrounding area. One further Listed Building has been considered, being the Grade II Listed Control Tower at Elvington Airfield. Although not a prominent structure within the landscape, Elvington Airfield (part of which falls within the Langwith (Reg 19, 2018) boundary) forms part of its setting.

3.3.2 Areas of potential impact on Landmark Monuments

Potential impact on these glimpsed views has been recognised throughout the development of a proposed boundary and emerging masterplan for Langwith. CYC HIA (2017) has identified the potential to obscure views of the Minster and other heritage assets as a potential impact of ST15.

3.3.3 Potential impact of Langwith (Reg 19, 2018) on Landmark Monuments

Impact on glimpsed views of the Minster has been considered as part of the design process throughout the development of a proposed boundary and emerging masterplan for Langwith.

Both York Minster (Grade I Listed) and Heslington Church (Grade II Listed) can be glimpsed from the southwestern corner of the proposed HEA, where the Minster Way bridlepath meets the Tilmire. The proposed development of a HEA would leave this area as open, green space, and impact on the view of the Minster would therefore be negligible, if not beneficial, by improving the character of the landscape within the foreground. The view of Heslington Church may be obscured within this view by the proposed A64 junction (see LVA, Landscape Agency 2018). This would represent a minor change to the wider view towards the city; the glimpsed view of the spire makes a minimal contribution to the significance of this designated heritage asset, and this change would represent a very slight impact on setting.

The Control Tower at the Air Museum (Grade II Listed)(Plate 2) is slightly more sensitive in terms of development within the surrounding landscape, as its intended function is, in part, as a viewing platform. However, the two-storey building is surrounded by museum exhibits, and although the terrain is flat, the views across the terrain towards Langwith are screened by stands of trees. Development of the airfield would mean partial loss of historic context, and perhaps some intrusion in views from the tower, but the overall ability to appreciate the immediate context, historic significance and evidential value of the heritage asset not be harmed, and overall impact would be slight.



Plate 2 Control Tower

The airfield is in itself a non-designated heritage asset; impact on this element is considered as part of the archaeological complexity characteristic, below.

3.4 ARCHITECTURAL CHARACTER

York retains a diverse range of architectural styles of medieval to modern date. Within the city a large number of medieval buildings survive. Areas of planned housing within the City walls include Bishophill and Aldwark, with South Bank and New Earswick outside the City walls. Victorian and Edwardian suburbs provide another distinct architectural character and layout, while post-war housing in the suburbs contains semi-detached and terraced housing.

3.4.1 Contribution of the area to Architectural Character

The landscape does not currently contribute to the architectural character of the city. There are few buildings within the landscape, the majority representing farmhouses and agricultural buildings, with the exception of structures on the airfield.

3.4.2 Potential impact of Langwith (Reg 19, 2018) on Architectural Character

Any large-scale development within the city has the potential to negatively affect this characteristic, if poorly designed or constructed at an inappropriate scale.

The potential impact of development at Langwith on the architectural character of York cannot be assessed at such an early stage as this is subject to detailed design of the development. Appropriate measures have been set out in the policies of the proposed Local Plan (Policy SS13 (iii) and Policy D1) to ensure that design of the settlement makes a positive contribution to the character of York, rather than eroding the architectural character of the city.

3.5 ARCHAEOLOGICAL COMPLEXITY

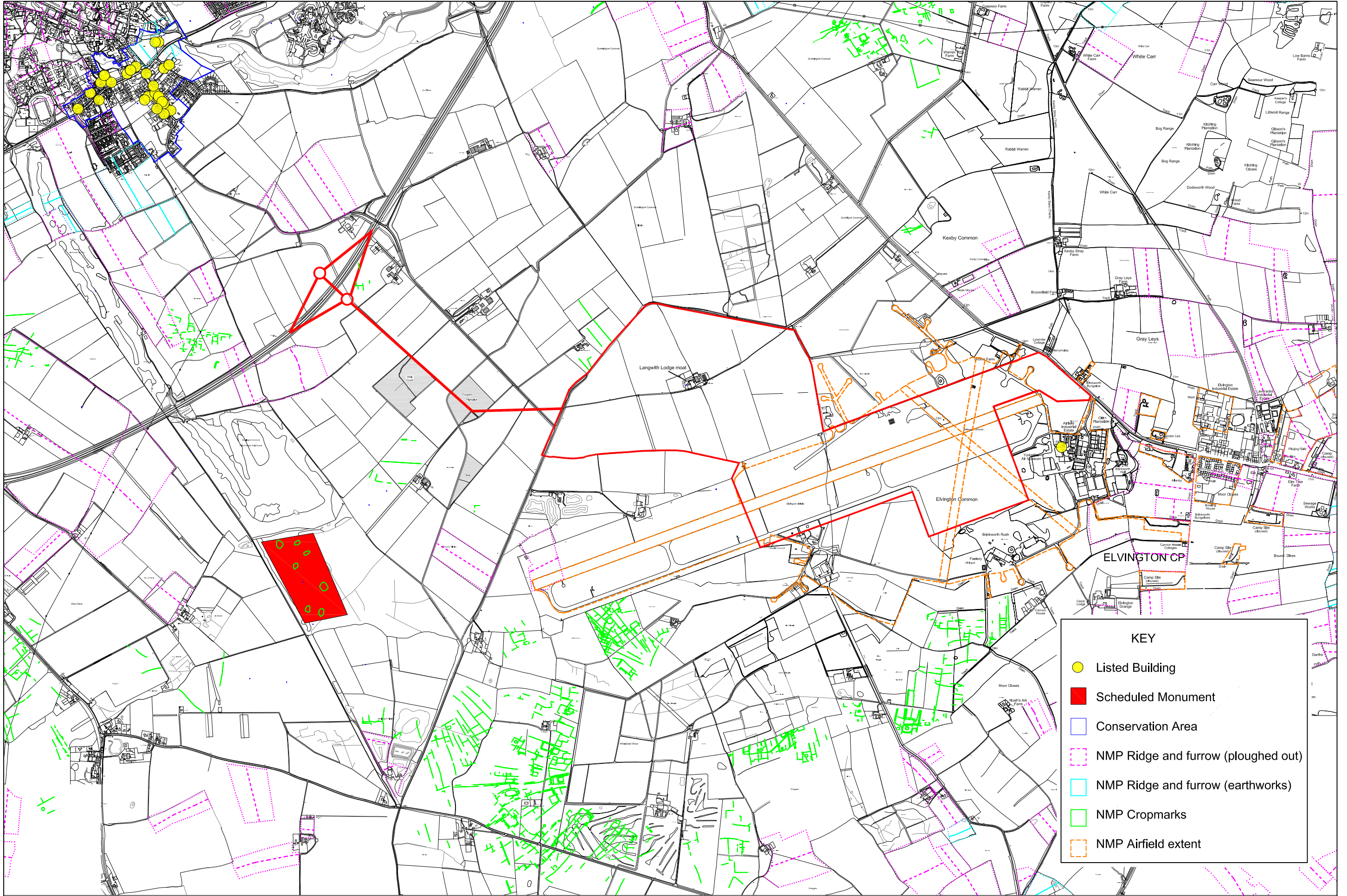
The City of York contains exceptionally well-preserved deposits relating to all periods from the Roman period onwards. The depth of deposits within the city is rare and represents 2000 years of urban development. These resources are finite and cannot be repaired or replaced once lost.

3.5.1 Contribution of the area to Archaeological Complexity

Previous Archaeological Desk-Based Assessment (FAS 2014) and Heritage Statement (FAS 2016), have set out the known archaeological character of the surrounding landscape, and provided evidence to indicate that Langwith (Reg 19, 2018) is likely to contain remains of Iron Age to Roman, and medieval date, and has the potential for hitherto unknown remains of all periods. Figure 2 shows cropmark evidence in the surrounding area, including areas of Iron Age to Romano British field systems.

Geophysical survey of the former proposed Whinthorpe (ST15 2013 Preferred Options) boundary included land around Langwith Lodge and to the south of the proposed A64 junction (ASWYAS 2014; GSB 2014 Figure 3). The field southeast of the proposed A64 junction produced evidence for Romano-British field systems, while the areas within the boundary of Langwith (Reg 19, 2018) produced more limited results (field boundaries, modern ploughing and drainage only). These results need to be tested further through archaeological evaluation.

Known heritage assets within the development boundary include a possible medieval moat adjacent to Langwith Lodge and Elvington Airfield. As such, the site contributes to two character elements; **the finite and non-renewable resource**, containing **known and unknown archaeological features and deposits which are not designated**.



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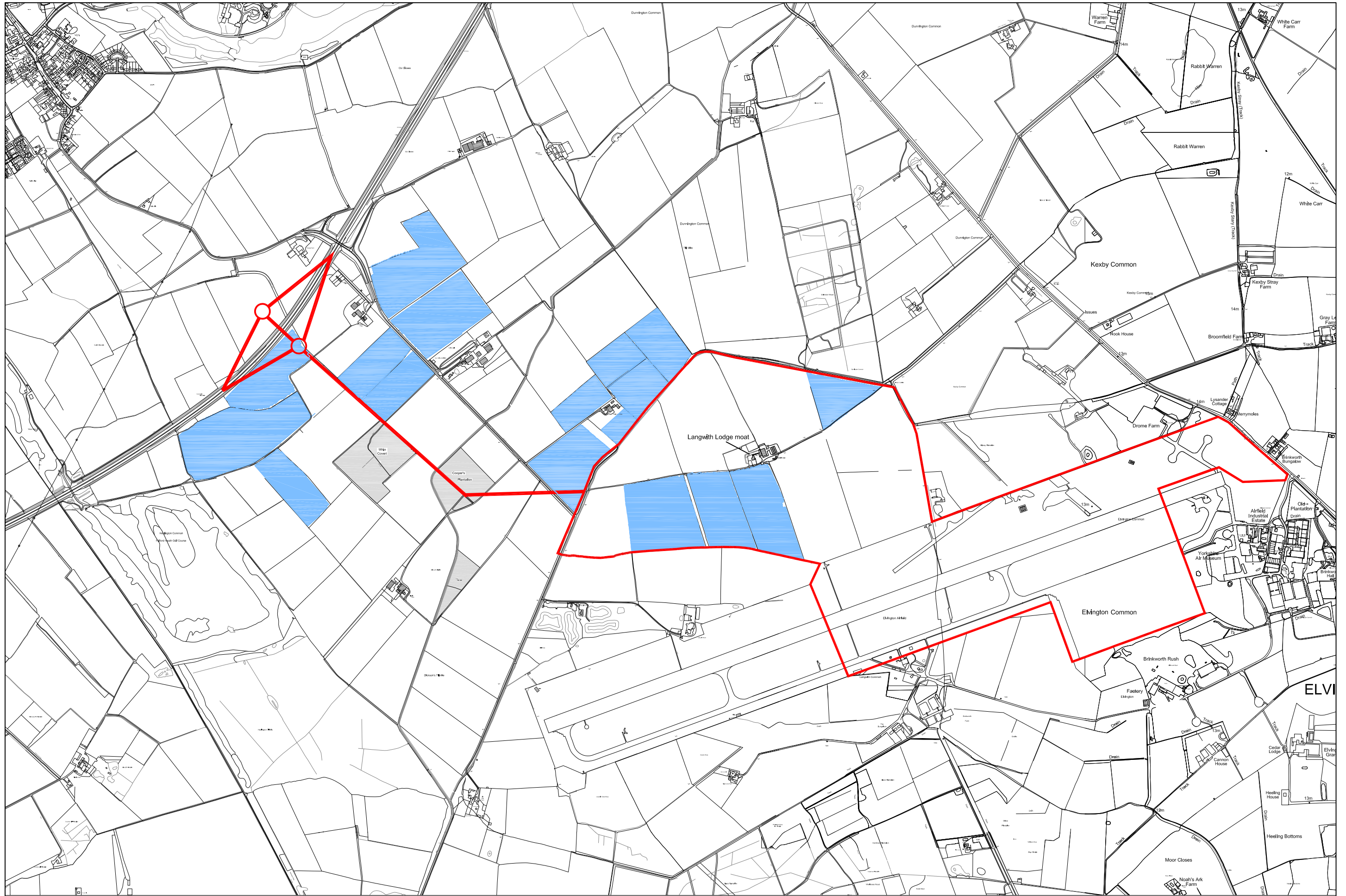
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Location of known heritage assets

Scale 1:20000



Figure 2



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Area of geophysical survey (2014)

Scale 1:15000



Figure 3

Langwith Lodge

Langwith Lodge is an earthwork identified as a possible medieval moat within the historic township of Langwith. The area is known to have been landscaped in recent years which may have disturbed any surviving below-ground remains, but there remains the potential for archaeological remains which will require evaluation as part of an archaeological strategy.

Elvington Airfield

Elvington military airfield was established in the 1940s, used by the Royal Air Force. Initially a grass airfield, the three hardened runways were constructed in 1942 as a substation of RAF Pocklington. The airfield was subsequently used during the Cold War by the American Air Force as a Strategic Air Command base between 1952 and 1958. The runway was lengthened to 1.92 miles, one of the longest in Britain, for use by the B36 bombers to deliver the nuclear deterrent. With the advent to the submarine launched 'Polaris' nuclear missiles, the base never became operational and it was vacated in 1958. From the 1960s to 1992, it was used by the RAF for test flights and manoeuvres. The airfield was sold by the Ministry of Defence in 1999. The core of buildings associated with the historic airfield now form the Elvington Air Museum, including the restored Control Tower (Grade II Listed; see Plate 2, above). Elements of the World War II runways and perimeter taxiway are extant at the eastern end of Langwith (Reg 19, 2018) boundary, but much is no longer legible, having been removed by the later runway which extends across the southern part of proposed boundary, with parallel taxiways.

3.5.2 Potential impact of Langwith (Reg 19, 2018) on archaeological complexity

Archaeological remains are finite and non-renewable, and any development within an open field site inevitably involves the destruction of below-ground remains. Areas of potential impact have been identified as the destruction of below-ground remains, loss of historic grain of the landscape, and loss of existing farmsteads.

A robust Archaeological Strategy was designed for Whinthorpe (ST15, 2013 Preferred Options Local Plan) in close liaison with the CYC Archaeologist and as noted, a programme of geophysical survey undertaken which includes land within the current boundary of Langwith (Reg 19, 2018). The strategy has been updated for Langwith (Appendix A). This programme would allow impact on the archaeological resource to be mitigated for by design or preservation by record. Opportunities to explore such a large area are rare, and the proposed archaeological strategy, to include a full schedule of evaluation, excavation, archive deposition and community involvement, will allow for greater understanding of the development of this landscape.

Development would result in partial loss of the 20th-century airfield, itself a heritage asset which has historic value. Elements of World War II airfield may be lost; surviving elements to the west, south and north of the Langwith boundary would be retained (see Figure 2). The hardstanding of the 1950s runway would be removed, either for development or ecological mitigation. The proposed masterplan uses the grain of the runway within the design as a means of retaining legibility of the former airfield (see Masterplanning, Barton Willmore 2018). Understanding of the site would be facilitated through interpretation at the museum.

3.6 LANDSCAPE AND SETTING

The landscape surrounding York contains a range of natural, historical and cultural features which contribute to the special qualities of the local landscape. The open landscape surrounding the city, both inside and outside the ring road, provides a key element of the setting of the city, and the area from which the compact form of the city can be appreciated.

The *Heritage Topic Paper* notes that

on a national scale, York's landscape is considered generally not to be of a particularly high quality...The landscape provides the city and its outlying villages with a rural setting and a direct access to the countryside, and thus has a value/status that reaches beyond the relative quality of the aesthetic landscape (*Heritage Topic Paper*, 2014, 6.29)

3.6.1 Contribution of the area to Landscape and Setting

'Landscape and setting' is the most relevant characteristic to area of the proposed allocation. The open, agricultural landscape provides the rural setting of the city, allowing for appreciation of its compact form, and settlement pattern of central city surrounded by outlying and free-standing villages, and wider landscape context. Previous assessments have established that ST15/Langwith contributes to this characteristic in the following ways:

- Infrequent long-distance **views out of city** towards the Wolds provide a sense of place within the wider Vale of York and contributes to appreciation of setting of the city. These are achieved from the ring road, ring road bridges and the Minster Way; these are not constant but are a 'surprise' element of the experience of travelling through the landscape;
- Infrequent **views into the city** provide a sense of place and connection with the urban core. This includes the glimpsed view of the Minster from Langwith Stray; these make a slight contribution to this characteristic.
- The area contributes to appreciation of the **relationship between York and villages in the wider area**. The area represents open space between the city (at Heslington/University of York) and the free-standing settlements of Elvington, Wheldrake, Escrick and Bishopthorpe. Within this area, where visible, settlements are discernible as stand-alone settlements within the landscape. This is appreciable in the immediate area when travelling through rural landscape to and from Elvington, and is critical to the settlement pattern of York;
- The agricultural character of the wider landscape (with vestiges of common land) is critical to appreciating the historic, rural setting of the city (**open countryside and green belt**). Extensive woodland and mature woodland are an important feature of the landscape, and filter the views across the landscape;
- Historic landscape features are readily legible features of the landscape. The extant field boundaries and ditches of the area reflect historic boundaries, the most notable being that of the township of Langwith, the northern boundary of which is now followed by the Minster Way.

3.6.2 Areas of potential impact on landscape and setting

The potential impact of development at ST15/Langwith on the landscape and setting of York has been considered in previous heritage assessments (FAS 2016; 2017). The CYC HIA (2017) notes that development of ST15 could potentially have a significant negative impact on the setting of the city by encroaching up to the ring road; changing the nature of the relationship between the southern edge of York and the surrounding open countryside; obscuring views of the Minster and other features, including the Wolds; and due to a negative impact on rural setting of a new access point from the A64.

Development in this area could negatively impact on the wider settlement pattern of York - in terms of central core and distinct satellite villages - through design of an inappropriate scale. Separation from the core city of York has been secured by setting the proposed boundary (both ST15 and Langwith) back from along the A64. Langwith (Reg 19, 2018) lies close to the village of Elvington and the perceived separation from Elvington is more sensitive to development in this location, due to the modern spread of development away from the historic core. Although the core village lies over 1.5km away along Elvington Lane to the east, the presence of industrial units, businesses, dispersed housing and a residential development at the end of Wheldrake Lane has extended the village further west, and so development begins to appear on Elvington Lane a few hundred metres east of the proposed Langwith boundary.

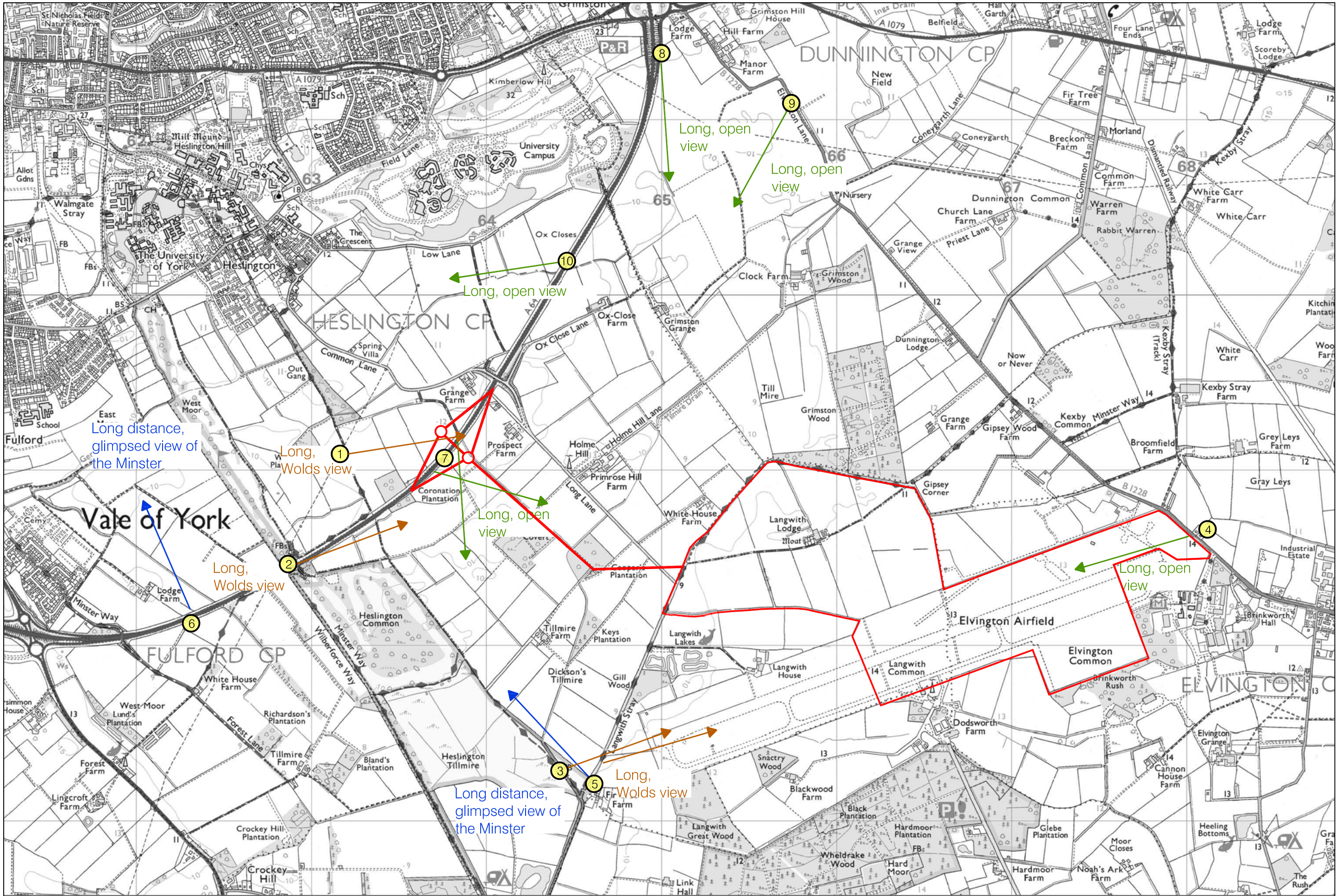
Development would result in the loss of open space and could potentially affect the legibility of the historic grain of the landscape.

3.6.3 Assessment of impact of Langwith (Reg 19, 2018) on Landscape and Setting

Views in and out of York

Views into and out of York have been considered within the most recent Heritage Assessment (FAS 2017) and are discussed in the Landscape and Visual Appraisal (Landscape Agency 2018). Those into York are discussed in the context of Landmark Monuments and perceived compactness, above. Views out of the city include those from the area of the proposed development towards the wider hinterland and the Wolds beyond.

Long views across the landscape are achieved from specific points or lengths of path in the landscape. These are not a consistent feature, but part of the experience of moving through the area both on foot and by car. The impact from specific viewpoints around the area was addressed in the Outline Visual Appraisal. The proposed development and the junction would result in the erosion or loss of some longer distance views within the rural landscape, but many would be retained.



Key views within the landscape

Scale 1:20000



Figure 4

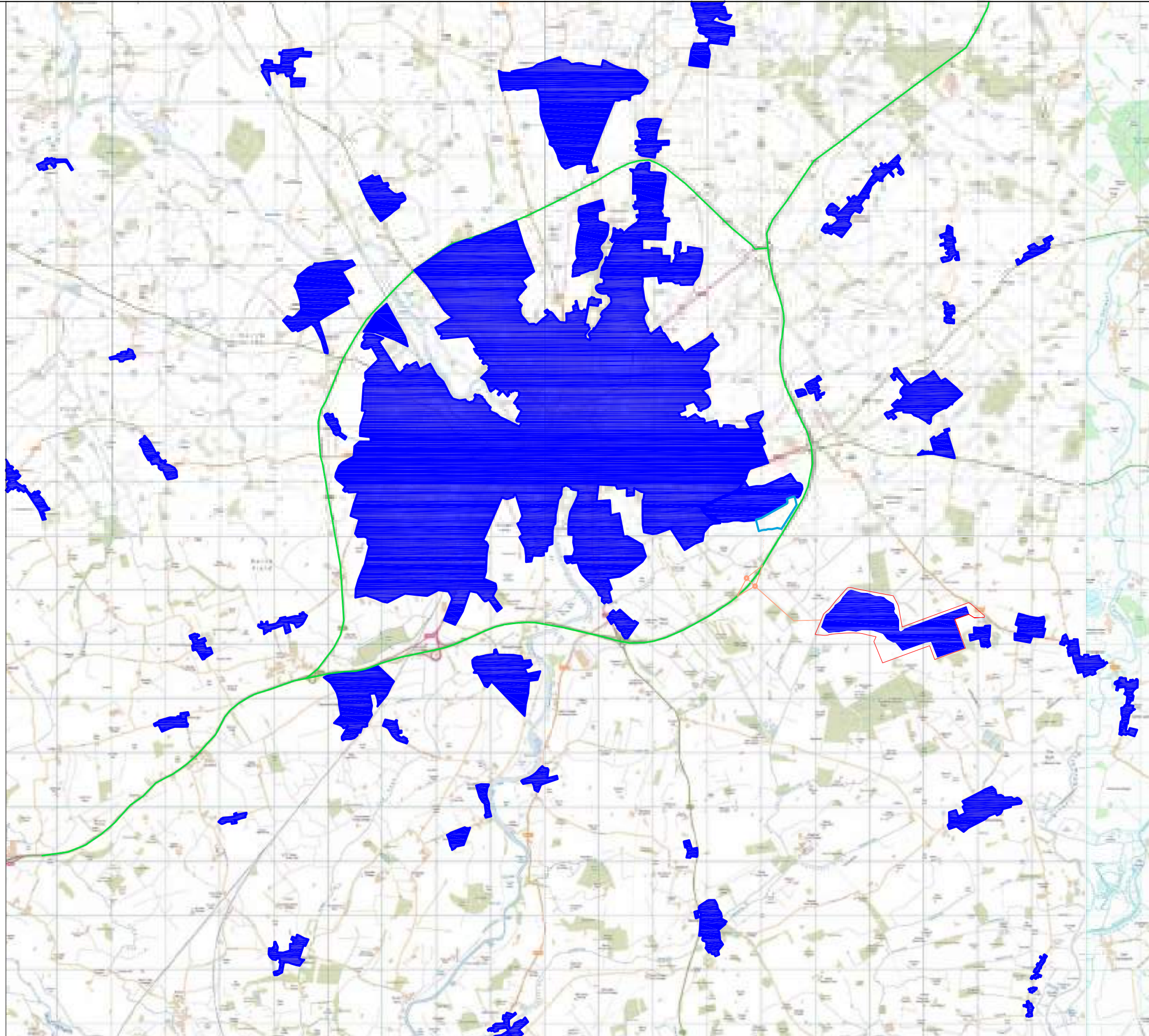
Figure 4 shows some of the views identified in previous assessments, and summary assessment of impact on these views is set out below:

- The view from the Minster Way north of the ring road is likely to be affected by the proposed new junction, which will occur views across the road to the east of Coronation Plantation (No.1). The new junction itself has the potential to create a new vantage point for experiencing this view, and would allow for a strong sense of orientation when travelling south to the new settlement.
- The view from the current footbridge (No. 2) is not likely to be significantly affected (see LVA). The A64 curves away in this location and so most of the proposed junction would not be visible. The road to the Langwith would be present in the foreground but views towards the Wolds would be uninterrupted. Likewise, the views from the Minster Way looking west are unlikely to be significantly affected. Changes in this area would be low-level (road and Habitat Enhancement Area, with possible glimpsed views of areas of housing) and the quality of views would be altered only slightly.
- Long views from the Minster Way/Langwith Stray along the airfield would be altered by the proposed development (No. 3), which would appear at a distance of over 1.5km from Langwith Stray. The development is therefore likely to be visible, and impact would be dependent on building heights and landscaping, but with appropriate design visual impact would be softened. If possible, permeable views through the development would enhance legibility of the former runway.
- Views looking across the landscape from Elvington Lane would be altered. The view is currently across an expanse of flat land which opens out quite suddenly, as one approaches the Air Museum from the north (No. 4). Landscaping would allow a rural character to this view to be appreciated, but views would inevitably be foreshortened.
- Minster views (Nos. 5 and 6) would not be affected. Some views south from the ring road would be lost due to the new junction (No. 7), some of the more extensive views across the rural landscape (Nos. 8 and 9) may feature glimpsed views of the settlement but their general character would not be harmed.
- The view across the land north of the ring road would be altered by the proposed link road (No. 10)

In summary, some specific views would be eroded or lost, specifically: view from the Minster way north of the ring road towards the Wolds; long views from the Minster Way/Langwith Stray along the airfield; the view west from parts of Elvington Lane. Minster views would not be affected. Some views south from the ring road would be lost due to the new junction, while some of the more extensive views across the rural landscape may feature glimpsed views of the settlement but their general character would not be harmed.

Settlement pattern

A new settlement in this area would clearly affect the broader settlement pattern. This impact can be discussed in terms of size in plan, but when considering York's setting it is more appropriate to consider how the development would be perceived in the landscape.



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Proposed development within the wider settlement pattern of York. Langwith (Reg 19, 2018) boundary (red) and proposed development area (blue)

Scale 1:75000



Figure 5

Viewed in plan, the site would represent a large example of one of York's satellite settlements (). The form of development, which has been adapted following discussions with Historic England, would be a single, linear high street which is characteristic of settlements in the wider landscape. In terms of perceived scale, when viewed from the surrounding area, the unique topography and form of the setting means that from no point in the landscape would the full extent of the settlement be visible. Details of the appearance of the settlement have to be defined, but the current proposals would see lower density, lower housing at the extremities of the settlement, softened by appropriate landscaping, which would allow the settlement to sit comfortably in the landscape. The Outline Visual Appraisal provides a series of viewpoints showing the extent of a two-storey housing development, demonstrating that this would be viewed within the current landscape of woodland and hedgerows.

The relationship with Elvington has been identified as a key area of impact. Again, the impact as perceived in plan differs from that experienced on the ground. The industrial park immediately adjacent to the airfield is screened from the road by dense planting which prevents development from appearing to extend all the way to the Air Museum. The current proposed boundary of Langwith has drawn away from the road, which will enhance the perceived separation when travelling down Elvington Lane. The current masterplan has been adapted to draw back from Elvington Lane, to avoid continuing frontage development and therefore a perceived coalescence with development further east.

Landscape character

Development of Langwith (Reg 19, 2018) would involve the loss of a tract of agricultural land in the green belt, particularly the area surrounding Langwith Lodge, north of the airfield.

The remaining landscape surrounding the proposed settlement of Langwith would be retained either in current agricultural use or would be managed as a Habitat Enhancement Area. The latter would bring areas of former common land back into rough, open land and therefore reflect its former character. The nature of the landscape as experienced from footpaths such as the Minster Way would, for the most part, be largely unaffected in this area. Although an open landscape, the intermittent hedgerows and plantations foreshorten views, and so across much of the route from Heslington to Langwith Stray, the settlement would be screened by current conditions, or glimpsed for only short distances. This would mean that the current character of the area would not be significantly altered. The most significant impact would be on the length of footpath which continues beyond the route to Langwith, which are generally limited by hedgerows. Views north across the landscape from this area would be lost.

Potential loss of historic grain has been taken into account in the proposed masterplan, which retains key boundaries, including the northern edge of Langwith township and the routeway past Langwith Lodge. Plate 3 shows the form of Langwith Township as shown on the Tithe Map; this outline will be readily legible as the northern boundary of Langwith (Reg 19, 2018).



Plate 3 Langwith Tithe Map (IR/30/41/121)

The historic grain of the airfield has also been taken into account in the masterplanning process. and will allow the runway to be read within the landscape.

Loss of farm buildings has been identified as a potential an impact on agricultural character. An appraisal of the historic significance of extant structures at the site is to be undertaken. Where practicable, any farmhouses or farm buildings of note will be retained; where they are to be removed, a detailed record would be made.

The proposed new junction would alter the character of views from a length of the ring road. The proposed sliproads would depart from the A64 within plantations, or new hedgerows would be planted alongside. There would be a loss of open views along a short length of the ring road, but the proposed designs would see this developed as a planted, enclosed stretch, which would be consistent with the intermittent areas of woodland along the A64 generally. The new junction would feature in views from the Minster Way from a short length of the route, eroding agricultural character slightly.

4.0 SUMMARY AND CONCLUSIONS

This document summarises and updates the results of previous assessments, which have been prepared to establish whether a new settlement to the southeast of the City of York can be accommodated without substantially harming the principal characteristics of the historic city.

Initial assessments have set out in detail the contribution that this part of York makes to the principal characteristics of the historic city and have concluded that the proposed development could potentially affect five of the principal characteristics of the city: compactness, landmark monuments, architectural character, archaeological complexity and landscape and setting. This document summarises the potential impact that the proposed Langwith (Reg 19, 2018) boundary would have on these.

Compactness

- Open land north of the ring road represents part of the rural fringe of the city and views across the area contribute to appreciation of the compact, contained form of the city.

These views could potentially be changed by the creation of a link road and would require careful design to minimise impact at the masterplanning stage.

Landmark monuments

- Rare, glimpsed views of the Minster and the spire of Heslington church make a small contribution to the setting of these monument, and appreciation of the city's skyline. Development of Langwith (Reg 19, 2018) according to the emerging masterplan may screen some views of Heslington church, but the direct view of the iconic Minster would not be harmed (see Landscape Agency 2018).

Archaeological complexity

- The area has the potential to contain archaeological remains of prehistoric to modern date that form part of the archaeological complexity of the wider city; and the area contains Elvington Airfield, which has historic and archaeological significance. These remains would be partly removed through development of the area.
- A robust Archaeology Strategy has been prepared which would put in place a programme of evaluation that would inform appropriate mitigation and allow archaeological remains to be preserved *in situ* as part of emerging designs, or by record through an appropriate programme of excavation or recording.

Landscape and setting

- Infrequent long-distance views towards the Wolds provide a sense of place within the wider Vale of York. These are achieved from the ring road and the Minster Way. Some of these views would be lost or altered, many key views of the Wolds would be retained
- Very infrequent views into the city provide a sense of place and connection with the urban core. The most notable of these is from Langwith Stray; as noted above, the view of the Minster would be retained.
- The area represents open space between the city (at Heslington/University of York) and the free-standing settlements of Elvington, Wheldrake, Escrick and Bishopthorpe. This is appreciable when travelling through open land to and from Elvington; the current proposed boundary for Langwith is set back from the road to allow this separation to be appreciated. Careful design of the access route and eastern edge of the proposed settlement will be required to reinforce this separation.
- The agricultural character of the landscape (with vestiges of common land) is critical to appreciating the rural setting of the city; large areas of agricultural land will be retained between Langwith and the city; the area within the development will be lost. Retention of the township boundaries and grain of the runway of the airfield will allow these aspects to be legible within the settlement.
- Within this area, where visible, settlements are discernible as stand-alone settlements within the landscape. This is important to the setting of York in this part of the city. Langwith should be designed as a discrete, standalone settlement.

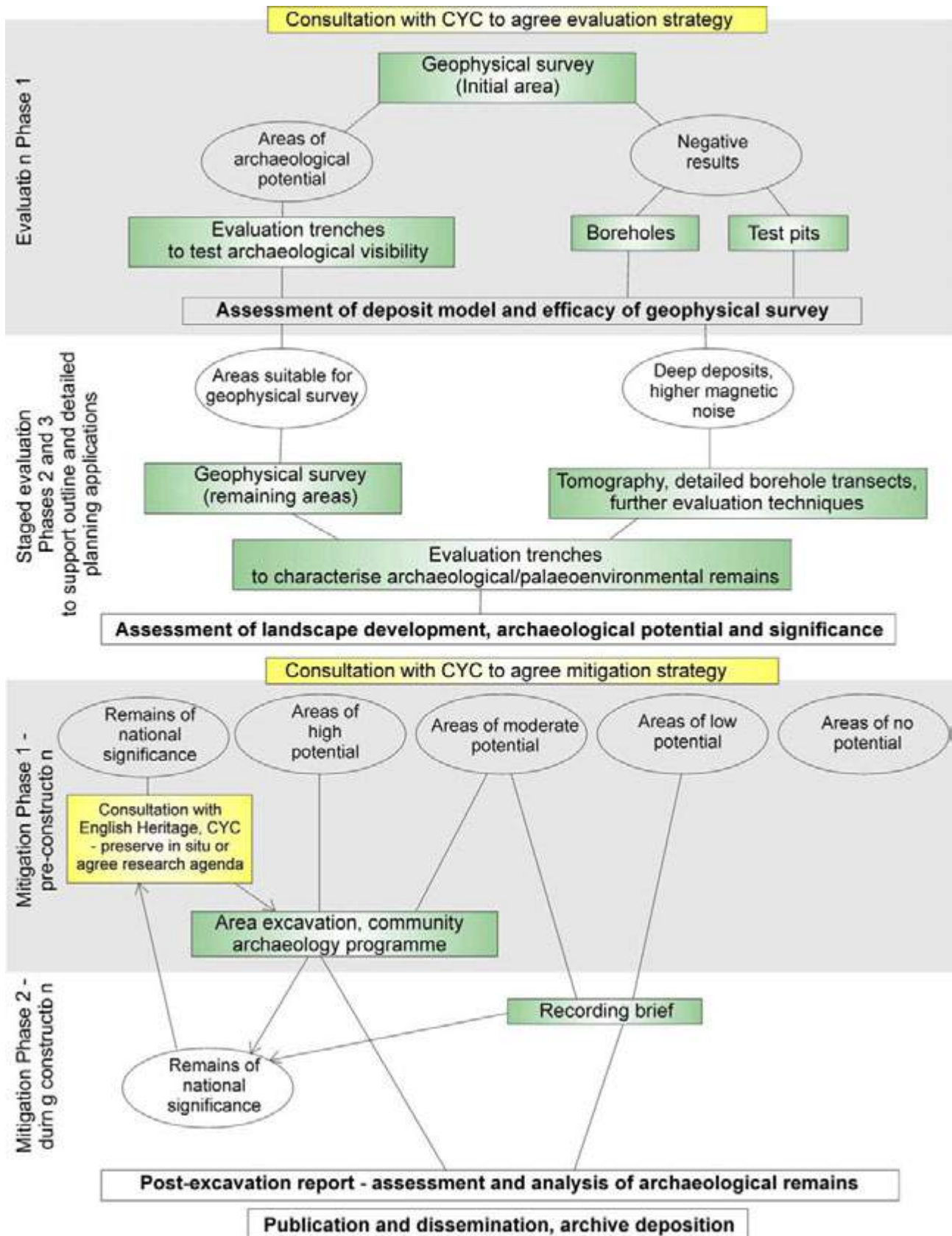
The assessment work has concluded that a new settlement could be accommodated within this part of the city, providing the following criteria are taken into account in ongoing design work:

- Appropriate scale: the settlement would have to sit comfortably in the settlement pattern of this area and the wider city, both in plan and in its perceived scale in the landscape;
- Location/separation: a degree of separation would be required from both the city and from surrounding settlements, in particular Elvington, in terms of actual distance and also perceived distance when travelling away from the city;
- Retention of agricultural character and historic grain of tracts of land adjacent to, and particularly north of, the ring road, sufficient to retain a perception of rural fringe around compact city'
- Retention of the characteristic of infrequent long-distance views out to the Wolds and across the rural landscape, and into the city.

Subject to more detailed design work, the assessment the current masterplan against these criteria has led to the conclusion that a settlement in this location could be accommodated without substantial harm to the special characteristics and setting of the historic city. Langwith (Reg 19, 2018) would be at the larger end of the scale of York's satellite settlements, but due to layout and localised topography/land use would appear at an appropriate scale when experienced within the landscape. The development would be situated close to the onset of development along Elvington Lane but would be designed to appear as a distinct settlement; the masterplan is developing to ensure that this separation is recognisable within the landscape by drawing back from the road and retaining an expanse of open space in this area. The proposed junction and new road to the university would have an impact on the views of the rural fringe of the city, by introducing a new road across the area north of the ring road. This would need to be mitigated by appropriate design, and the surrounding area retained as agricultural land, in order to minimise impact. Some long-distance views within the landscape would be lost; many would be retained. The remaining character elements to which the landscape contributes would not be significantly harmed.

The potential impact must be weighed against the public benefit of providing a sustainable settlement in this area that would form part of a city-wide strategy to reduce pressure for housing which might result in inappropriate development in more harmful locations on the edge of the city. The settlement offers an opportunity to continue the place-making tradition established at sites such as New Earswick and Derwenthorpe.

APPENDIX A ARCHAEOLOGICAL STRATEGY





APPENDIX 7

BIODIVERSITY ADDENDUM REPORT



The Planning Case for Langwith Regulation 19 Local Plan

ST15 Langwith Addendum Report

Ecology and Biodiversity

March 2018

1. Introduction

1.1 This addendum report updates and reviews, in respect of biodiversity, information pertaining to the proposals for ST15 (Reg 19 2018, hereafter called ST15) and Langwith (Reg 19 2018, hereafter called Langwith), the latter promoted by Sandby (York) Ltd & Oakgate/Caddick Group (hereafter referred to as Sandby & Oakgate) and assesses therefore the soundness of the plan against the four tests of the National Planning Policy Framework (NPPF). This review assesses the following :

- a) Section 2. Biodiversity concerns with ST15 Reg 19 2018 and applies the four NPPF tests;
- b) Section 3. Biodiversity concerns regarding open space policy OS10 promoted in relation to ST15 Reg 19 2018;
- c) Section 4. Langwith Reg 19 2018;
- d) Section 5. City of York Council's (CYC) ecology plan and designations;
- e) Section 6. The Biodiversity Impact Accounting Metric work pertaining to Langwith Reg 19 2018 compared to Langwith Reg 18 2017;
- f) Section 7. Timing of provision of mitigation and compensation and management plan;
- g) Section 8. Issues concerned with incorporation of third party (Handley) land within the plan for ST15 Reg 19 2018;
- h) Section 9. Issues concerned with access into the proposed sites;
- i) Section 10. Review of compliance of Langwith Reg 19 2018 with Local Plan policies;
- j) Section 11. Consultation with Natural England;
- k) Section 12. Review and relevance of recent case law regarding air quality and sites of nature conservation interest (the Wealdon case);
- l) Section 13. Update to the survey protocol in respect of bringing the Langwith development forward.
- m) Section 14 presents conclusions.

2. Biodiversity concerns with ST15 Reg 19 2018 and the NPPF tests

- 2.1 The plan for ST15 Reg 19 2018 has not been informed or evidenced by ecological surveys nor has the Government backed biodiversity impact accounting metric been applied to calculate the development impacts across the area (see Section 6). As a result, although OS10 (see Figure 1) is identified as an area to be set-aside as compensation habitat in the plan, the published evidence base is silent on the extent of the requirement for compensation land which seems not to have been determined, as well as the type of habitat to be created, the means of acquiring the required compensation land, and the method of financing its conservation management *in perpetuity*. In addition, the third party land to the south west of the site has not been secured and it is unknown as to whether this could be effectively brought forward as part of the development, nor is it known whether there would be overriding ecological constraints which would prevent its development. CYC have not demonstrated, by reference to their published evidence base, that ST15 is the most appropriate strategy, nor that it is justified when compared to reasonable alternatives (Langwith Reg 19 2018). The plan has not been positively prepared, nor has ST15 been shown to be deliverable and hence it is not an effective plan.
- 2.2 By contrast, Langwith Reg 19 2018 has the benefit of detailed surveys, application of the metric to calculate biodiversity unit losses, calculation of gains delivered by specific land parcels and hence full design of mitigation and compensation outcomes that will deliver a specified extent of net gain related to the Langwith development. Langwith has therefore been positively prepared, is justified, effective and compliant with national policy. Judged against this reasonable alternative ST15 is simply not sound.
- 2.3 The highways representations submitted by Sandby & Oakgate (Lawrence Walker Ltd Transport Appraisal March 2018) have set out, and concluded, that ST15 Reg 19 2018 is undeliverable because there is only one access to the site – from the north. The allocation is therefore undeliverable in transport terms since a secondary access is required. Hence ST15 Reg 19 2018 has not been positively prepared. The only location to provide a secondary access would be across the eastern half of the runway. This would be highly likely to impact upon the airfield SINC and land-take and the traffic generated

would likely lead to a significant reduction in Skylark populations for which the airfield is designated a SINC, without a commitment to compensate for these impacts by incorporating other land into a secured and deliverable habitat creation and management plan specifically for Skylark. Nor is there any confidence that the part of the SINC designated on botanical grounds would be secured for nature conservation. Hence ST15 Reg19 2018 is neither justified nor effective.

2.4 Further, NPPF provides a safeguarding measure concerned with making a development acceptable in planning terms :

176. Where safeguards are necessary to make a particular development acceptable in planning terms (such as environmental mitigation or compensation), the development should not be approved if the measures required cannot be secured through appropriate conditions or agreements. The need for such safeguards should be clearly justified through discussions with the applicant, and the options for keeping such costs to a minimum fully explored, so that development is not inhibited unnecessarily.

In view of the fact that third party land is included as development land in plan ST15 Reg 19 2018, that OS10 includes ownership complications, and that the plan lacks detail as to how net gain can be therefore delivered, it is unclear as to whether and how the required appropriate conditions or agreements to make the development acceptable could be secured. This brings into focus whether ST15 Reg 19 2018 can actually, therefore, be delivered.

2.5 Consequently, Langwith Reg 19 2018 offers the only means of delivering a positively prepared plan that is justified, effective and deliverable, providing net gain, consistent with the Government's recommendations in both the 25-year Environment Plan and both the extant and revised National Planning Policy Framework (NPPF). To promote ST15 Reg 19 2018 on the basis of an evidence base that fails to demonstrate that the plan is deliverable, has been positively prepared, is justified and hence effective, in preference to Langwith, is in direct contravention of City of York Council's (CYC's) duties and responsibilities for biodiversity as laid out in the NPPF.

3. Biodiversity concerns regarding OS10

- 3.1 Area OS10 (see Figure 1) has been broadly and simply identified on the policies map as an area on which the impacts of ST15 Reg 19 2018 would be compensated. However, there is no evidence base to support the size or configuration since CYC have not determined the compensation requirement through the use of the Government biodiversity impact accounting metric or by any other means. The area (192ha) is the same as that promoted in Langwith Reg 19 2018 which has been based on evidence yet the footprint of the two plans are clearly different.
- 3.2 Whilst OS10 provides a buffer to the Heslington Tillmire SSSI it does not provide a buffer to the airfield which is also compromised in biodiversity terms by the inclusion of the third party (Handley) land.
- 3.3 A further significant flaw in ST15 Reg 19 2018 is that the strategic access road to ST15 would traverse OS10 (see the evidence of Lawrence Walker Limited). This would materially impact on its ability to provide sufficient habitat for the biodiversity interest of the land as compensation. Roads fragment habitat and in the case of OS10 would reduce the whole areas' value to those species for which compensation is required – breeding Skylark, breeding waders and overwintering waders and wildfowl. An access road through OS10 serving the residents of the development would seriously compromise the value of the site for biodiversity and its use as compensation land would fail. There is no precedent for identifying and creating land for the compensation of biodiversity and then traversing through it with a road.
- 3.4 A further complicating factor is that a central part of the eastern side of OS10 is under third party control which further complicates its delivery.
- 3.5 The above reasons demonstrate that CYC have failed to evidence that OS10 can work. As such therefore OS10 and hence ST15 Reg 19 2018 fail the NPPF tests – the plan has not been positively prepared, it cannot be justified and cannot therefore be deemed to be effective.

4. Langwith Reg 19 2018

- 4.1 Langwith Reg 19 2018 is similar to Langwith Reg 18 2017 (see Quod representations for an explanation of the background to the proposed allocation) but with the area to the north west removed. Langwith Reg 18

2017 was the subject of biodiversity impact analysis as part of representations to the Reg 18 2017 Plan, which demonstrated that allocation resulted in a net biodiversity gain. In biodiversity terms, the situation of Langwith Reg 19 2018 is exactly the same as with Langwith Reg 18 2017 subject to the removal of biodiversity impacts arising from omitted development in the north west area. Reanalysis of the biodiversity impact accounting metric is presented in Section 6.

- 4.2 The evidence base for Langwith Reg 19 2018 has enabled effective calculation of the extent of compensation habitat, and type of habitat, to be created and managed under a long-term biodiversity management plan to compensate for the effects of the development on biodiversity. The access road from the A64 into the development has been planned in accordance with the location of the compensatory habitat, by keeping the access road to the eastern edge of the compensation land (not traversing and fragmenting it as in the case of OS10), and effectively screened to ensure traffic does not compromise the value of the Habitat Enhancement Area. The required secondary access to Elvington Lane from the eastern part of the development makes the plan sound in traffic terms and since the built development on the eastern part of the airfield has been compensated for through the Habitat Enhancement Area and the restoration of the western half of the airfield, the whole plan has been positively planned and is justified and effective.

5. City of York Council's Ecology Plan

- 5.1 CYC's Ecology Plan which identifies sites of nature conservation interest at SINC and above, is a key document in respect of assessing development against ecological constraints. There have been some material changes to the designation suite in respect of biodiversity conservation. The ST15 Reg 19 2018 plan has not taken these designations into account in a quantitative manner whereas the use of the Government supported biodiversity impact accounting metric has been applied to Langwith Reg 19 2018 and enabled calculation of impacts on the SINC's and further, how much net gain would be delivered through the restoration of the western half of the airfield and the Habitat Enhancement Area.

5.2 The policies map of the Reg 19 2018 Plan shows that the entire Elvington airfield has been designated and now ratified as a SINC for its bird interest. The two areas that have been designated for their botanical interest (previously identified in Langwith Reg 18 2017 as S1 and S2) are highlighted separately; there is obviously also some bird interest in these but there is not botanical interest across the whole site. For ease of reference the current position is labelled up on Figure 2. The citation information for the two separate SINC's designated primarily for their botanical interest, and the entire airfield SINC is:

- SE64-08YK Elvington Airfield grassland – (the eastern and western parcel) Designated for acid/neutral grassland (Guideline Gr5). All guidelines (and criteria scores) which apply are Gr5 32/20, Fe5 15/10, Mh2 8/6, Gr3 14/8, Gr4 21/8, 12 rare inverts present, B5 (Skylark). Refer to Figure 1.
- SE64-07YK Elvington Airfield runway and surrounds – (whole site) Designated for birds under Guideline B5 (Skylark). Refer to Figure 1.

5.3 The area to the south of the airfield, Dodsworth Farm, is a candidate SINC – CYC have split out both ratified and candidate SINC's on the Regulation 19 map when previously they were combined. The colour is similar to that for a Local Nature Reserve (LNR) (thicker, orange); the site at Dodsworth Farm is not an LNR. The citation information is :

- SE64-09YK Dodsworth Farm, candidate SINC for bird interest, does not meet botanical criteria.

5.4 Grimston Wood (to the north of the proposed Langwith development). In updating the biodiversity evidence base the decision was made to remove 'Sites of Local Interest' from the Proposals Map. These are sites of lesser significance than the SINC designations, but which were thought to have some interest for wildlife. Their identification had been collated over many years, with reasons sometimes unclear, outside of the formal North Yorkshire and York SINC system and therefore they had not been subject to the same level of scrutiny. Whilst, for the purposes of assessing planning applications in the area they might not normally be considered, the biodiversity impact accounting metric undertaken by Sandby & Oakgate for Langwith Reg 19 2018 has included Grimston Wood on the basis that it is possible that

residents of the Langwith development might visit the area, though it is under private ownership. There is no evidence to suggest that ST15 Reg 19 2018 has been assessed for impacts on Grimston Wood.

5.5 In addition to the revised SINC information, there are, for reference, two pieces of updated work for the Local Plan in relation to biodiversity :

- a) A refresh of the City of York Local Biodiversity Action Plan which identifies habitats and species that are important in York and identifies actions to conserve and enhance them.

https://www.york.gov.uk/downloads/file/15320/local_biodiversity_action_plan_lbap_2017

- b) A review of Sites of Importance for Nature Conservation (SINCs) which summaries the results of a re-survey and review of around half of the 97 SINCs identified in York.

https://www.york.gov.uk/downloads/file/15319/sites_of_importance_for_nature_conservation_sinc_review_2017

5.6 Hence, for the purposes of the analysis of potential impact, the previously designated SINC on the airfield (ie. SE64-08YK) has been given a metric score for distinction of 6 (highest score) and condition score of 2 (highest score is 3). However, the rest of the airfield (which was candidate SINC but is now ratified – SE64-07YK) is given a score of 6 for distinctiveness (thereby reflecting its SINC status) but a score of 1 for condition since it is relevant just for one bird species (Skylark). These figures are used in the updated metric information presented in Section 6.

5.7 A key point from the perspective of the airfield SINC designation is that large tracts of the SINC are of course concrete/tarmac because they are runways. By necessity those areas have to be included in the designation otherwise the SINC would be comprised of a number of fragmented and disconnected habitat areas and couldn't function as a management unit. The loss of airfield to development under ST15 Reg 19 2018 has not been assessed by CYC, rather they have relied upon the calculations undertaken for Langwith by Sandby & Oakgate to propose that impacts can be compensated for by the

creation of OS10 which, we have demonstrated above, is compromised by the road access to the development in the ST15 Reg 19 2018 plan.

- 5.8 Consequently, the evidence base for ST15 Reg 19 2018 is weak and the status of the designations has changed during the course of the plan preparation which gives rise to it being an unsound plan because a) the SINC designations have not been quantifiably compensated for in respect of impacts and b) there is a better alternative (Langwith Reg 19 2018). The plan cannot therefore be justified and is therefore ineffective, hence failing the NPPF tests of soundness.

6. Review of the Biodiversity Impact Accounting Metric for Langwith Reg 19 2018

- 6.1 Langwith Reg 19 2018 has been revisited (it was assessed in 2017 as part of the representations to the Reg 18 2017 Local Plan) in order to recalculate the biodiversity impact of Langwith and to assess the development against the provision of mitigation and compensation in order to ensure the delivery of net gain to biodiversity as part of the proposals, consistent with Policy SS13. The development footprint is now 231.83ha.

- 6.2 The masterplan for Langwith Reg 19 2018 (Drawing 23190_9610_Concept Masterplan rev S-A1) now excludes a land area to the north west of the main development block (previously on Langwith Reg 18 2017) and the area at the far east of the airfield is reduced as a result of a modification of the development boundary to accommodate more land for the Yorkshire Air Museum. Langwith Reg 18 2017 which included a school, playing fields and community farm (but with greenspace accommodating 70% of the parcel area) in the north-west of the proposed allocation was calculated to give rise to an impact (loss) of **1015.22** biodiversity units. The calculations are shown in Table 1.

- 6.3 Removal of this 40.92ha area from the development would reduce the impact (loss) to **977.42** biodiversity units. The calculations are shown in Table 2. Hence, whilst the Langwith Reg 18 2017 plan delivered a net gain of 254.95 units, the revised plan Langwith Reg 19 2018 provides a net gain of 292.75.

Table 1. Biodiversity accounting loss and gain calculations for Langwith Reg 18 2017 plan (see Figure 3).

Land parcels	Biodiversity unit losses
A	- 203.28
C2	- 437.42
C3	- 136.62
D	- 37.80
J	- 37.64
K	- 9.00
L	- 2.00
Indirect impacts	- 151.46
Total biodiversity unit losses	-1015.22
Land parcels	Biodiversity gains (credits)
C1	260.28
H	353.75
H1	656.14
Total biodiversity gains (credits)	1270.17
Balance (gain credits)	+254.95

Table 2. Biodiversity accounting loss and gain calculations for Langwith Reg 19 2018 plan (see Figure 4).

Land parcels	Biodiversity unit losses
A	- 203.28
C2	- 437.42
C3	- 136.62
J	- 37.64
K	- 9.00
L	- 2.00
Indirect impacts	- 151.46
Total biodiversity unit losses	-977.42
Land parcels	Biodiversity gains (credits)
C1	260.28
H	353.75
H1	656.14
Total biodiversity gains (credits)	1270.17
Balance (gain credits)	+292.75

6.4 The benefits of Langwith Reg 19 2018 by comparison with ST15 Reg 19 2018

under Policy SS13 are therefore :

- a) A quantified biodiversity impact accounting metric assessment has been applied to the development plan;
- b) A series of land parcels, contiguous with the Heslington Tillmire SSSI, named the Habitat Enhancement Area and H1 (collectively now known as the Habitat Enhancement Area), together with the western half of the Elvington airfield, would be put into a long-term biodiversity management plan for the purposes of enhancing nature conservation at a significant scale to compensate for these losses, providing 1270.17 biodiversity units. The area incorporated for nature conservation is significant, being 192.05 ha. This provides a net gain in biodiversity units for Langwith Reg 19 2018 of 292.75 (Langwith Reg 18 2017 plan 254.95) representing a 30% gain (Langwith Reg 18 2017 plan 25%) over and above the losses from the development. The assessment of the entire development and the provision of compensation habitat as described, are inextricably linked;
- c) The habitats created as compensation would be i) wet grassland mosaic with reedbed ditches and shallow scrapes to provide habitat for breeding waders, Skylark, and overwintering waterfowl (the HEA), ii) both wet grassland and tussocky grassland to provide habitat for breeding waders (especially Curlew), Skylark and overwintering waterfowl, iii) neutral grassland on the western half of the airfield and the removal of concrete/tarmac with a restoration to the same grassland as the rest of the site, for the benefit of the inherent vegetation communities, breeding Skylark, breeding and overwintering waders. In addition, it is suggested that some of the H1 area would be devoted to lowland high nature value farming through the provision of unsprayed cereal crops which would be left as stubble overwinter to provide an abundant food source for seed-eating birds;
- d) Account has been taken of potential for impacts from the residential occupancy of the allocation on the Lower Derwent Valley Special Protection Area including Wheldrake Ings;
- e) Road access into the site from the A64 has been designed so as not to compromise the biodiversity value of the Habitat Enhancement Area and the secondary access, that has been shown to be a requirement of a deliverable scheme, has been accommodated and biodiversity impacts

calculated and included in the package of compensation measures;

- f) A detailed Biodiversity Management Plan is to be prepared geared to deliver the net gain benefits and with the potential to attract a conservation body as the management organisation for the entire area, linking with the management of the Heslington Tillmire SSSI;
- g) Buffer habitat to the south of the airfield to protect existing candidate SINC wetland habitats for birds;
- h) Buffer habitat from the development to the western half of the airfield;
- i) Buffer habitat to the north of the western half of the airfield by the exclusion of the third part (Handley) land. All of these buffers to the nature conservation assets of the airfield and the southern area outwith the airfield boundary are designed to protect biodiversity value;

6.5 By contrast, the ST15 Reg 19 2018 plan is unsound because of the following :

- a) No properly quantified ecological impact assessment and calculation of no net loss/net gain requirements;
- b) An area of open space (OS10) provided with no guidance as to what habitats are to be created, nor management regime, nor length of management period, hence inability to determine whether this would provide satisfactory compensation;
- c) The compensation habitat is compromised by the only access road to the development site cutting it in two thereby fragmenting and reducing the biodiversity value of the compensation area. CYC have failed to demonstrate therefore that OS10 can work. Further, if it has a purpose to also provide open space land for recreation (as suggested by Policy GI6), this would entirely compromise its ability to provide any compensation for development of the ST15 Reg 19 2018 plan;
- d) The ability to deliver the compensation habitat is reliant on obtaining control over third party land;
- e) No specific analysis nor determination of how ST15 would compensate for impacts on the Lower Derwent Valley Special Protection Area;
- f) No details as to how impacts on the Heslington Tillmire SSSI or airfield

habitat of biodiversity interest including Skylark habitat are to be buffered;

- g) No Biodiversity Management Plan to secure long-term delivery of compensation habitat;

6.6 In summary therefore, Langwith Reg 19 2018 is compliant with the four tests of the NPPF (para. 182) because :

- a) Langwith has been positively prepared, having been fully researched, accounting for infrastructure requirements and would deliver a sustainable development in respect of impacts on biodiversity which have been both mitigated and compensated for. This is not the case for ST15 Reg 19 2018 since no specific mitigation or compensation proposals are brought forward as part of the plan;
- b) Langwith provides the most appropriate strategy for housing delivery when considered against reasonable alternatives. Langwith provides a more sound, sustainable, better designed and more appropriate alternative in having considered the implications for biodiversity than ST15 and is hence superior to it in planning terms;
- c) Langwith is effective in that it is deliverable over its phased period. Indeed, the compensation land is in Sandby & Oakgate ownership. However, delivery of ST15 is complicated because of multiple ownership of the OS10 land identified as open space on which to provide compensation (though no details given as to the extent, form and function of that compensation);
- d) Langwith is consistent with national policy ie both the extant National Planning Policy Framework, the 2018 revisions to the NPPF and the 2018 25-year Environment Plan with regards to the protection and enhancement of biodiversity through net gain delivery. ST15 however, is unsound in respect of national policy in the absence of effective biodiversity assessment, mitigation and compensation for biodiversity impacts and no account taken of the need to deliver net gain.

6.7 ST15 Reg 19 2018 is deemed to be an unsound allocation, failing to comply with the NPPF tests of positively prepared, justified, effective and consistent with national policy.

7 Timing of provision and management plan

- 7.1 In terms of the timescale for delivery, it is proposed that the capital works to restore the western half of the airfield, together with the wetland habitat creation and neutral grassland for waders and Skylark, would be brought forward as the first phase of the scheme, and it is expected delivery would commence soon after the grant of planning permission in accordance with a revised SS13 policy (Quod March 2018). The completion of these works and their interplay with the commencement of other parts of the development will be controlled via planning condition, to ensure that the biodiversity merit in this area is not materially harmed during delivery of the scheme.
- 7.2 Policy SS13 currently requires a period of 5 years for compensation habitat to be created before development commences. However, this length of period is not qualified and is without any evidential support. It is presumed that it such a period has been suggested to ensure maturity of habitat to enable compensation of those species to be affected by the development. In the case of the grassland habitats to be created both on the Habitat Enhancement Area and the western half of the airfield, these can be established relatively quickly and should support good populations of those target species for compensation within 2 years. A 5 year term is too onerous, is not justified, and there are no known precedents for such a length of term.
- 7.3 The HEA and western half of the airfield, and associated buffers, will be managed in accordance with a Biodiversity Management Plan to be established for the entire area and land holding (the 192ha), taking account of the added biodiversity interest of these habitats as a result of their juxtaposition with the 46ha Heslington Tillmire SSSI. It is envisaged that a management body/NGO would take on the management of this entire area in the future under a of capitalized endowment payment which would be provided within the Biodiversity Management Plan.
- 7.4 The Biodiversity Management Plan would support the planning application for Langwith in accordance with the Langwith 19 Reg 2018 plan. Within the management plan will be a detailed visitor access management strategy. There will be controlled public access to the Habitat Enhancement Area using effective visitor management approaches including screened and bunded footpaths to the periphery, affording locational views into the conservation area whilst protecting the biodiversity interest and avoiding disturbance, as

deployed at most official nature reserves in the UK. By contrast, there would be no access to the western half of the airfield since exclusion here is the most effective way of protecting and maximising the biodiversity interest. The access strategy will detail the buffer and fencing requirements to ensure that access is effectively managed. However, there are opportunities to manage access to the SSSI better in association with the Plan and to have circular walks which do not ingress into the HEA, so that disturbance is avoided.

- 7.5 Although Langwith Reg 19 2018 is further away from the SSSI than previous iterations of the proposed Langwith allocation, a similar treatment to reduce the potential for cats to enter the SSSI will be accommodated, though in practice this is unlikely to be a significant issue, either on the SSSI, the HEA or the restored western half of the airfield, because of the distances involved.
- 7.6 The buffer to be created to the land south of the airfield would comprise a mounded/landscaped bund planted with native scrub. The scrub will provide additional nesting habitat whilst avoiding tree development so as to prevent perching sites for corvids that would predate the nests of birds. There would be a security fence and ditch to prevent ingress of people into this adjoining land. The buffer treatment would be expected to screen the residential development and associated activity from the wetland and coarse grassland area of the adjacent land.

8 Handley land

- 8.1 One of the principles of the mitigation and compensation design will be to create a significant buffer habitat between the compensation areas and the residential development. This will reduce or prevent the impacts of urban edge such as ingress and trespass, vandalism and disturbance. These will be incorporated at a) the land south of the airfield (see above), and b) the land to the east of the western half of the airfield.
- 8.2 To the north of the western half of the airfield is the land under third party ownership (Handley, see Figure 5). This land is interesting in its landscape quality and lines of mature trees that form a backdrop between the airfield and the Langwith area of the development. The land is currently under arable and grassland and the stubbles that have been left are proving attractive to a range of bird species.
- 8.3 Retention of this area as farmland, especially under a regime such as that

which operates currently, is important in order to buffer the prospective nature conservation enhancements of the airfield, comprising Skylark habitat and habitat for breeding and overwintering waders. In addition to the security fencing of the western half of the airfield, deployed in order to prevent access by people (people walking dogs would have a substantially deleterious impact on the objectives for the site), this third party land provides a natural buffer. Any development on those fields, even if the ecological constraints could be overcome, would significantly affect the proposed nature conservation value of the airfield once habitat restoration has taken place. Further, any such development would also need to compensate for its impacts and deliver net gain under the CYC policy, which is likely to be constrained by local availability.

9 Access road

- 9.1 The main entrance route into the Langwith site will be a new road coming off the A64. This will run alongside the eastern edge of the Habitat Enhancement Area which is 137ha (c.340 acres). Formal structural vegetation planting will not be used along the route to screen the road from the HEA because this would be used by corvid predators having, therefore, an impact on the wading bird species and Skylark for which the HEA is principally designed. Instead, as is often used on nature reserves at this scale, there would be a significant water-filled ditch system and reedbed planting, running along the western side of the road. This will give significant screening of cars from the HEA and will provide habitat in its own right, whilst also quickly attenuating any road noise.
- 9.2 On major roads, road noise has been found to have an impact on the success of territory establishment in some species (because noise muffles bird song). However, this would not be the case here in view of the fact that the provision of a reedbed will create a buffer between the new access and the Habitat Enhancement Area such that there would not be any disturbance to birds.

10 Review of compliance with Local Plan Policies

Policy GI1 – Green infrastructure

- 10.1 Langwith Reg 19 2018 would be compliant with this Policy. Specifically, it protects and enhances open space, maintains the integrity of existing green corridors, increases the extent of 'village green' environments and, through

the habitat enhancement areas adjacent to the Heslington Tillmire SSSI, it provides nature conservation benefits to the York region. The use of the biodiversity impact accounting metric has enabled a quantitative assessment of the impacts of the development to be made so that effective mitigation and compensation provision can be made. In addition, the incorporation of a 400m buffer from the statutorily designated site, the use of a multiplier uplift to the metric to account for any potential indirect impacts from increased visitor use of the SSSI and (at >5km away) the Lower Derwent Valley Special Protection Area, has enabled full and effective mitigation to be provided thereby protecting natural habitats and wildlife as part of a responsible development. ST15 Reg 19 2018 by comparison does not have the detail sufficient to test its compliance with this policy.

Policy GI2 – Biodiversity and access to nature

- 10.2 Langwith Reg 19 2018 would be compliant with this Policy. However, we do not consider that the term ‘where appropriate’ has relevance ie ‘In order to conserve and enhance York’s biodiversity, any development should where appropriate.....’, it is our view that development should always ensure that biodiversity is protected. We recommend that the Policy is therefore modified (see Quod 2018). Specifically, demonstrable need for the development, which will have an impact on one of the two SINC’s on Elvington airfield and, on the eastern half of the airfield, has been addressed by the application of the biodiversity impact accounting metric and enabled calculation of biodiversity unit losses which are then converted into a compensation requirement such that the development delivers an overall net gain in biodiversity.
- 10.3 Langwith takes account of local biodiversity action plan objectives, and has designed buffer zones in proximity/adjacent to the Heslington Tillmire SSSI, and third party land to the south of the airfield where a small wetland is present. The ecological compensation areas are also buffered from the residential development in order to maintain their ecological and biodiversity interest. The use of the metric has enabled effective quantification of impacts and hence design of the appropriate provision of mitigation and compensation.
- 10.4 Langwith is one of the very first developments of its kind in the country to have applied the biodiversity impact accounting metric as promoted by Government, and the only one in the York region to do so. Hence it is an exemplar scheme in relation to accounting for and compensating for

biodiversity impacts, providing a quantitative net gain to biodiversity in the region. Therefore, in addition to being compliant with Policy GI2, Langwith is fully compliant with the Governments 25 year Environment Plan :

Under one of the 25 year Environment Plan goals of 'Using and managing land sustainably', is the policy objective to *'Embed an environmental net gain principle for development including housing and infrastructure'* which reflects a strengthening of how biodiversity is treated within the planning system and is likely to be made mandatory for all planning authorities to make sure all development delivers net gain in biodiversity (page 32 of the 25 year Environment Plan).

10.5 Langwith would also be compliant with the revised (in draft) National Planning Policy Framework :

168. Planning policies and decisions should contribute to and enhance the natural and local environment by: d) minimising impacts and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

172. To protect and enhance biodiversity and geodiversity, plans should:

- a) identify and map components of local wildlife-rich habitats, including the hierarchy of designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by local partnerships for habitat restoration or creation; and
- b) promote the conservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

173. When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

- 10.6 Re-meandering of the Tillmire Drain, incorporating wetland enhancements for breeding waders and overwintering waterfowl on land through which the drain runs, will result in biodiversity enhancements to this watercourse. Further, any potential for impacts on the Lower Derwent Valley SPA, has been accommodated in the ecological assessment and designed into the habitat mitigation and compensation.
- 10.7 In so doing, Langwith Reg 19 2018 has taken full account of CYC's Biodiversity Audit (2010) and Local Biodiversity Action Plan (2017) in respect of potential impacts on designated sites of nature conservation importance. It is our view, however, that the pursuit of retention of biodiversity within development sites (as emphasized in Policy GI2) is often unrealistic and evidence demonstrates that this very often leads to overall net loss in biodiversity since developments are very rarely able to deliver effective biodiversity conservation within a development site. That is why, whilst biodiversity retention within Langwith has been achieved as far as possible, the overarching objective has been to create large-scale new and enhanced habitats outwith the boundary of the proposed allocation site within a long-term management framework. This is consistent with the Government's net gain principles of the 25 year Environment Plan and the revised NPPF (see above). Further details of the reason why concentrating on biodiversity conservation within the development site boundary is usually flawed, is provided in Hill (2013) and www.environmentbank.com.
- 10.8 However, Langwith has adopted a biodiversity offsetting approach to delivering net gain in biodiversity and this accords with Policy GI2 which states '*Biodiversity offsets are measurable conservation outcomes resulting from actions designed to compensate for residual adverse impacts arising from a development after mitigation measures have been taken. The goal of biodiversity offsets is to achieve no net loss and preferably a net gain of biodiversity*'. A net gain of 292.75 biodiversity units has been achieved in the design of the Langwith Reg 19 2018 plan.
- 10.9 Further, although Langwith is beyond the 1km distance of the Lower Derwent Valley Special Protection Area which Policy GI2 states is the applicable distance against which development applications should be assessed, the proximity to the SPA has been accounted for through an uplift in the metric calculations as a result of the potential for increased visitor use of the SPA by Langwith residents. This therefore represents a precautionary approach on

the part of the Langwith. In contrast, ST15 Reg 19 2018 does not have the detail sufficient to test its compliance with this policy.

Policy GI3 – Green infrastructure network

- 10.10 Langwith Reg 19 2018 would be compliant with this Policy. In particular, the provision of habitat enhancement areas to the north and west, juxtaposed adjacent to the Heslington Tillmire SSSI, running through to the south and east of the development and the habitat restoration and enhancement work on the western half of Elvington airfield, will provide a major corridor of wildlife value. Since access to these areas will not be allowed, and pressure on the SSSI will be reduced, the value to biodiversity will be substantially increased beyond its current position comprised principally of low biodiversity value arable farmland. Hence the development will result in an increase in the ecological value of the green infrastructure network. By contrast, ST15 Reg 19 2018 does not have the detail sufficient to test its compliance with this Policy.

Policy GI4 – Trees and hedgerows

- 10.11 Langwith Reg 19 2018 would be compliant with this Policy. Within the development footprint there will be a significant increase in the number of trees allowed to reach maturity as features within the landscape setting. Although trees will not be planted within or near the wet grassland and neutral grassland mosaic habitat creation and enhancement areas (since trees harbour corvid predators of wading bird nests and chicks), some of the hedgerows on the boundary of the mitigation site and within the development itself, will be augmented with trees. Some areas of the development will also have significant structural planting of native broadleaves in order to provide effective screening where it is needed, in addition to habitat for wildlife, thereby contributing to an overall net gain in biodiversity. By contrast, ST15 Reg 19 2018 does not have the detail sufficient to test its compliance with this policy.

11 Consultations with Natural England

- 11.1 Natural England's representations to the Reg 18 2017 Local Plan raised objections to ST15 Reg 18 2017 would require to see the following components in a scheme for any objection to be removed (see Table 4.4 of

the City of York Pre-Publication draft Local Plan (Regulation 18 Consultation, Sept 2017) Demonstrating the Duty to co-operate (Interim Statement)) noting that :

174. If no less environmentally sensitive location is identified and the council decide to retain this substantial allocation, it would be necessary to locate the new housing a minimum of 400m from the SSSI and put in place (and secure in perpetuity) a) the measures which will be necessary to manage visitor numbers and disturbance on the SSSI b) alternative green spaces within the settlement which will attract residents away from the SSSI and c) funding methods for long term management of these mitigation measures.
 175. Due to the scale and proximity to the SSSI encourage the Council to consider fully alternative sites through the SA.
 176. The site requirements or site policy for ST15 should include the requirement to mitigate for, or as a last resort, compensate for impacts on Elvington Airfield SINC.
- 11.2 Sandby & Oakgate have been in close consultation and correspondence with Natural England over the past four years with regards to Langwith, including site visits and several meetings in York. It is therefore worth of note that Langwith Reg 19 2018 takes account of all of the above points made by Natural England and accommodates them into the design of the extensive mitigation and compensation proposals. By contrast, **no** plans have been put forward by the Council to address the concerns of Natural England in respect of ST15 Reg 19 2018.

12 Relevance of the case of Wealden District Council, Secretary of State for Communities and Local Government, Lewes District Council, South Downs National Park Authority and Natural England

- 12.1 As part of the evaluation review of Langwith we have had regard to the findings of the above case. The case involves the incorporation of a policy against development within 7km of the Ashdown Forest Special Area of Conservation in order to protect the natural vegetation of the SAC from nutrient enrichment and pollution as a result of residents' traffic volumes that would increase in the area with an increase in development.

12.2 However, the habitats that comprise the Heslington Tillmire SSSI and the Habitat Enhancement Area and the airfield compensation areas, are not specifically so nutrient poor that small increases in nitrates would have any material impact on the vegetation communities in those areas. The situation with regards to the vegetation communities in Ashdown Forest are different in that they are considered to be susceptible to increased nutrient loading from the environment. This is not to say that the vegetation at Heslington Tillmire and the airfield could withstand substantial inputs of nutrients but these areas have been exposed to agricultural practices and nutrient enrichment over many years and it is highly unlikely that vehicle emissions from the Langwith development would make a material impact to that situation. Consequently, it is considered that the Wealdon case is not relevant to Langwith Reg 19 2018.

13 Update on biodiversity survey

13.1 In order to have as much up-to-date information as possible to inform the final planning application and designs, together with ensuring effective mitigation and compensation delivery at a scale sufficient to deliver net gains in biodiversity, a further breeding bird survey of the entire area, to include the development footprint, airfield, proposed Habitat Enhancement Areas, and the Heslington Tillmire SSSI, is planned for 2018.

14 Conclusions

14.1 To conclude, it is material to the case of Langwith Reg 19 2018 by comparison with ST15 Reg 19 2018 that :

- a) A quantified biodiversity impact accounting metric assessment has been applied to the proposed allocation while there is no evidence supporting ST15 Reg 19 2018;
- b) A series of land parcels, contiguous with the Heslington Tillmire SSSI, named the Habitat Enhancement Area and H1 (collectively known as the Habitat Enhancement Area), together with the western half of the Elvington airfield, would be put into a long-term biodiversity management plan for the purposes of enhancing nature conservation at a significant scale to compensate for these losses, providing 1270.17 biodiversity units. The area incorporated for nature conservation is significant, being 192.05

ha. This provides a net gain in biodiversity units for Langwith Reg 19 2018 of 292.75 (Langwith Reg 18 2017 plan 254.95) representing a 30% gain (Langwith Reg 18 2017 plan 25%) over and above the losses from the development. The assessment of the entire allocation and the provision of compensation habitat as described, are inextricably linked. Langwith Reg 19 2018 is therefore compliant with NPPF para 176;

- c) The habitats created as compensation would be i) wet grassland mosaic with reedbed ditches and shallow scrapes to provide habitat for breeding waders, Skylark, and overwintering waterfowl (the HEA), ii) both wet grassland and tussocky grassland to provide habitat for breeding waders (especially curlew), Skylark and overwintering waterfowl, iii) neutral grassland on the western half of the airfield and the removal of concrete/tarmac with a restoration to the same grassland as the rest of the site, for the benefit of the inherent vegetation communities, breeding Skylark, breeding and overwintering waders. In addition, it is suggested that some of the Habitat Enhancement Area would be devoted to lowland high nature value farming through the provision of unsprayed cereal crops which would be left as stubble overwinter to provide an abundant food source for seed-eating birds;
- d) Account has been taken of potential for impacts from the residential occupancy of the development on the Lower Derwent Valley Special Protection Area including Wheldrake Ings;
- e) Road access into the site from the A64 has been designed so as not to compromise the biodiversity value of the Habitat Enhancement Area and the secondary access, that has been shown to be a requirement of a deliverable scheme, has been accommodated and biodiversity impacts calculated and included in the package of compensation measures;
- f) A detailed Biodiversity Management Plan geared to deliver the net gain benefits and with the potential to attract a conservation body as the management organisation for the entire area, linking with the management of the Heslington Tillmire SSSI;
- g) Buffer habitat to the south of the airfield to protect existing candidate SINC wetland habitats for birds. Buffer habitat from the development to the western half of the airfield. Buffer habitat to the north of the western half of the airfield by the exclusion of the third part (Handley) land. All of

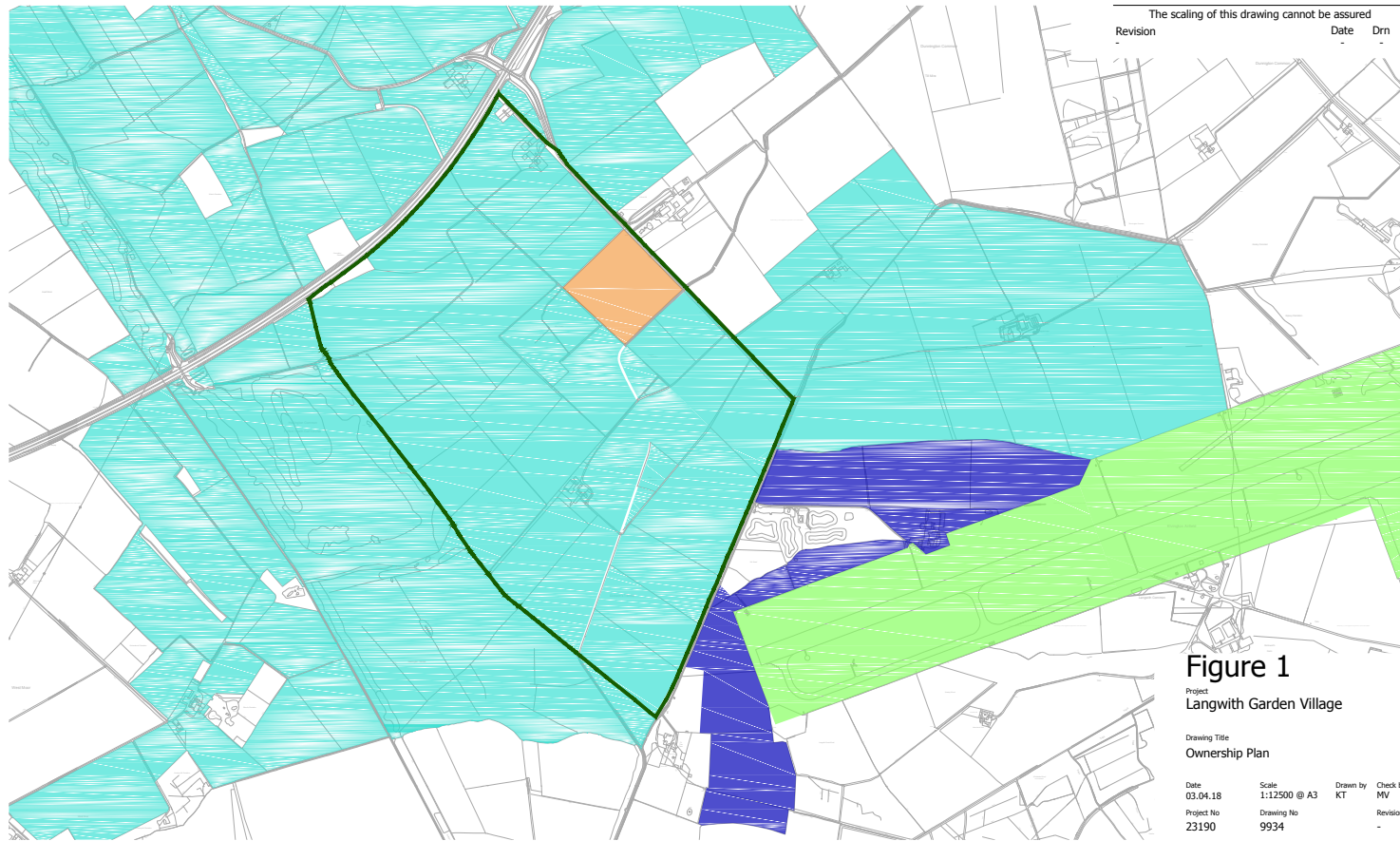
these buffers to the nature conservation assets of the airfield and the southern area outwith the airfield boundary are designed to protect biodiversity value;



- 14.2 Langwith Reg 19 2018 is therefore a positively prepared allocation that is justified, effective in being able to be delivered (for example, all the land requirements are in the ownership of Sandby & Oakgate), and is compliant with national policy as well as compliant with the Government's 25 year Environment Plan and revised (in draft) NPPF. Hence Langwith Reg 19 2018 is a sound allocation.
- 14.3 By contrast, the ST15 Reg 19 2018 allocation is unsound because of the following :
- a) There has been no evidenced and published quantified ecological impact assessment and no calculation of no net loss/net gain requirements;
 - b) An area of open space (OS10) provided with no evidence as to what habitats are to be created, nor management regime, nor length of management period, hence inability to determine whether this would provide satisfactory compensation;
 - c) The compensation habitat is compromised by the only access road to the development site cutting it in two thereby fragmenting and reducing the biodiversity value of the compensation area. CYC have failed to demonstrate therefore that OS10 is appropriate and can work. Further, if it has a purpose (Policy GI6) to also provide open space land for recreation, this would entirely compromise its ability to provide any compensation for development of the ST15 Reg 19 2018 plan;
 - d) The ability to deliver the compensation habitat is reliant on obtaining control over third party land;
 - e) No specific analysis nor determination of how ST15 would compensate for impacts on the Lower Derwent Valley Special Protection Area;
 - f) No details as to how impacts on the Heslington Tillmire SSSI or airfield habitat of biodiversity interest including Skylark habitat are to be buffered;
 - g) No Biodiversity Management Plan or any evidence to demonstrate how long-term delivery of compensation habitat can be secured;
- 14.4 As a result, therefore, ST15 Reg 19 2018 is deemed to be an unsound plan,

failing to comply with the NPPF tests of positively prepared, justified, effective and consistent with national policy.

Reference

Hill, D. (2013). Biodiversity Offsetting. Feature article. In Practice 81. Pp 7-11. Chartered Institute of Ecology & Environmental Management. [Won CIEEM Best Practice Award 2014.](#)



-  OS10 Boundary
-  Sandby
-  Bramley Land
-  Oakgate / Caddick Groups
-  Handley

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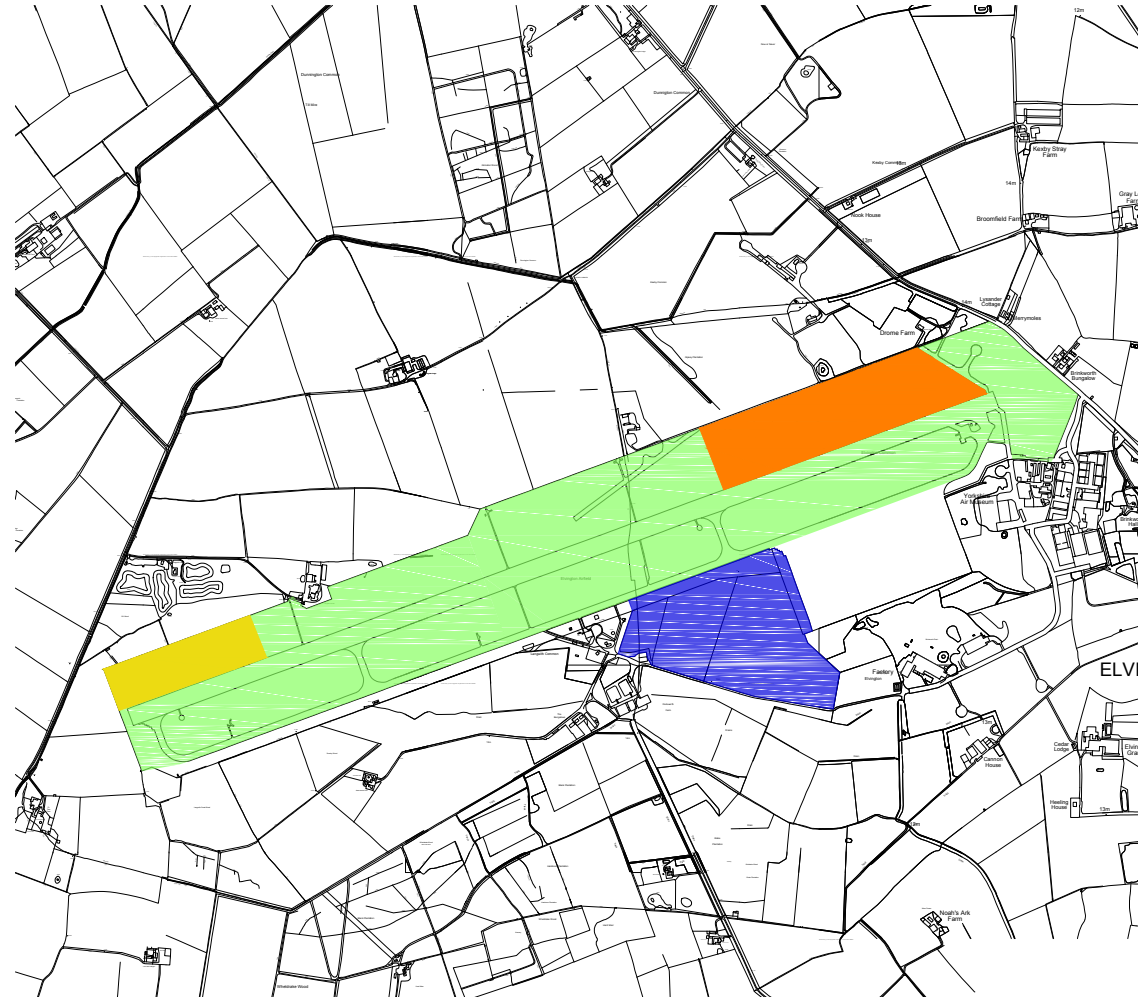
2312000 - 2309923110 - 2319923190 - Whitehorse New Settlement, YorkVA4 - Design Register/Master Planning/Drawings/23190_9934_Fig 1 Ownership Plan.dwg - A3

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The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd

- Airfield SINC (SE64-07YK)
- Grassland SINC S1 (SE64-08YK)
- Grassland SINC S2 (SE64-08YK)
- Dodsworth Farm Candidate SINC (SE64-09YK)

Figure 2

Project
Langwith Garden Village

Drawing Title
Labelling of the various SINC designations under the Regulation 19 plan

Date	Scale	Drawn by	Check by
03.04.18	1:12500 @ A3	KT	MV
Project No	Drawing No	Revision	
23190	9936	-	

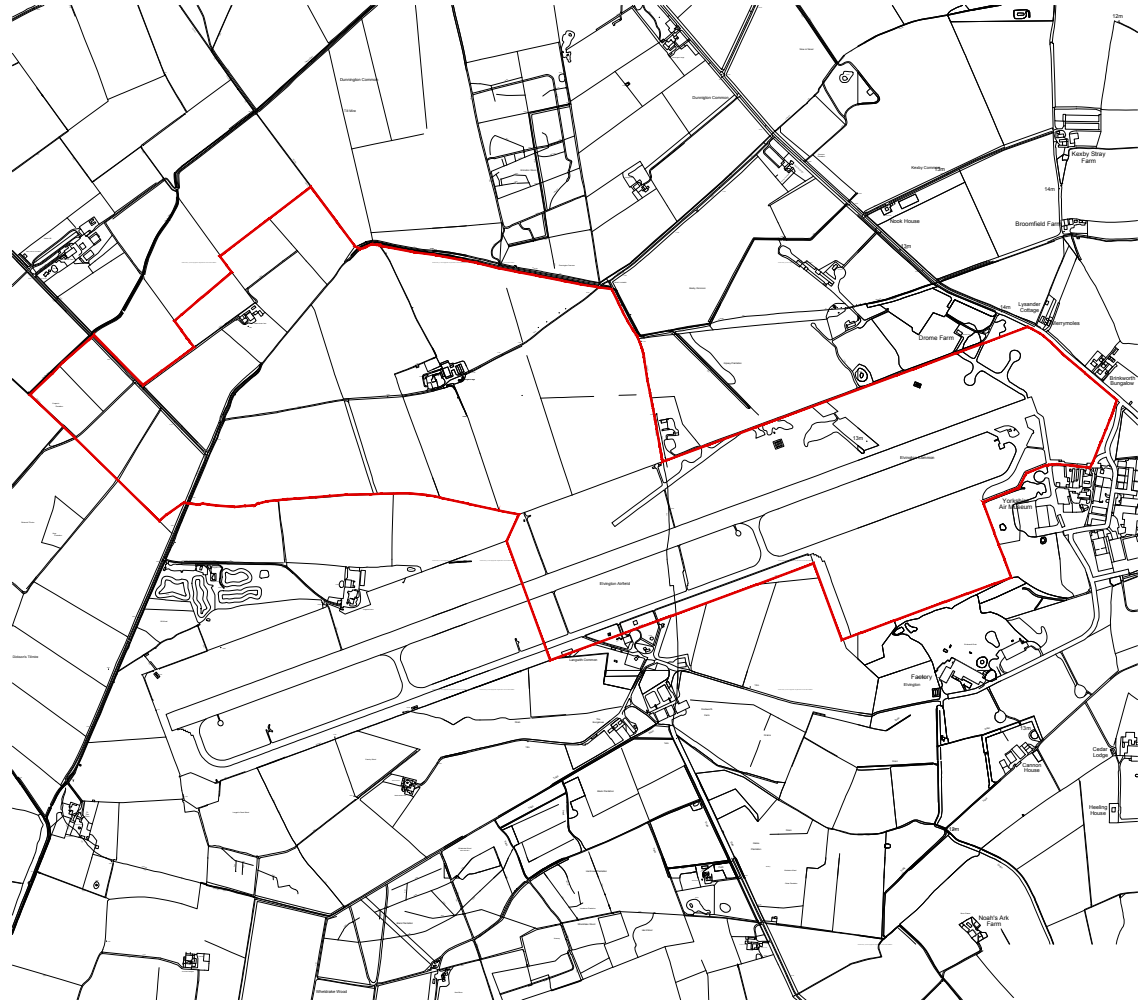
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The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd

 Langwith Reg 18 2017

Figure 3
 Project
 Langwith Garden Village

Drawing Title
 Site Location Plan

Date	Scale	Drawn by	Check by
03.04.18	1:12500 @ A3	KT	MV
Project No	Drawing No	Revision	
23190	9937	-	

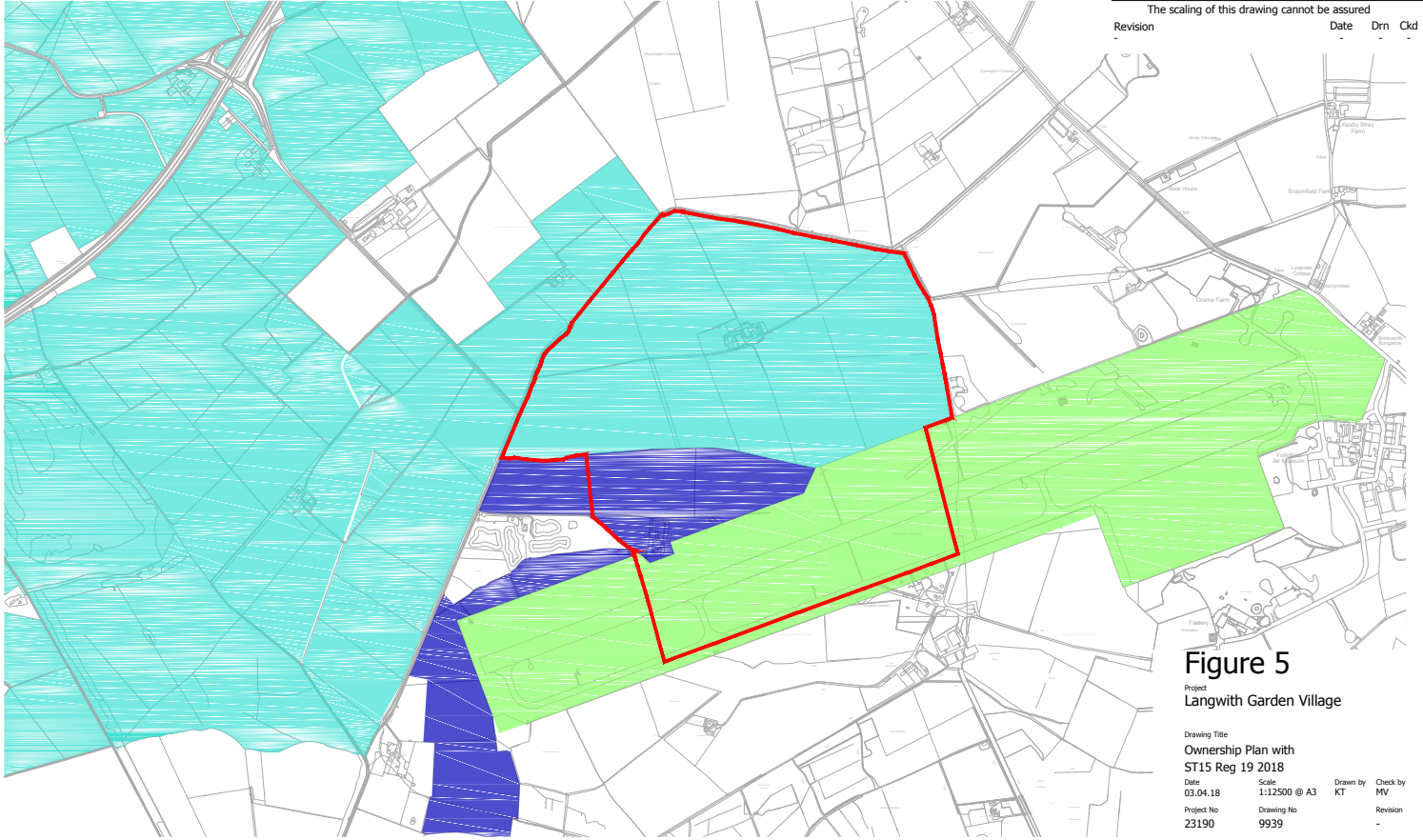
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The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd

Figure 5
Project
Langwith Garden Village

Drawing Title
Ownership Plan with
ST15 Reg 19 2018

Date	Scale	Drawn by	Check by
03.04.18	1:12500 @ A3	KT	MV
Project No	Drawing No	Revision	
23190	9939	-	

- ST15 Reg 19 2018
- Sandby
- Oakgate / Caddick Groups
- Handley

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31/3/200 - 23999/2100 - 23190/2100 - Whitbyrize New Settlement, York/AA - Design & Register/Plaster Planning/Drawings/23190_9939_Fig 5 Ownership Plan with ST15 Reg 19 2018.dwg - A3



APPENDIX 8

POLICIES SUBJECT TO THE REPRESENTATIONS BY LANGWITH DEVELOPMENT PARTNERSHIP LIMITED



APPENDIX 8

POLICIES AND ALLOCATIONS SUBJECT TO THE REPRESENTATIONS BY LANGWITH DEVELOPMENT PARTNERSHIP LIMITED

Paragraph 2.5	
Policy DP1	York Sub Area
Policy DP2	Sustainable Development
Policy SS1	Delivering Sustainable Growth for York
Policy SS2	The Role of York's Green Belt
Policy SS13	Land West of Elvington Lane
Paragraphs 3.62 to 3.68	
Allocation ST15	
Policy SS21	Land South of Airfield Business Park, Elvington
Policy SS22	University of York Expansion
Policy H1	Housing Allocations
Policy H2	Density of Residential Development
Policy H3	Balancing the Housing Market
Policy H10	Affordable Housing
Policy HW2	New Community Facilities
Policy HW3	Built Sports Facilities
Policy HW4	Childcare Provision
Policy HW5	Healthcare Services
Policy HW6	Emergency Services
Policy HW7	Healthy Places
Policy ED3	Campus East (of the University)
Policy D1	Place Making
Policy D2	Landscape Setting
Policy D3	Cultural Provision
Policy GI1	Green Infrastructure
Policy GI2	Biodiversity and Access to Nature
Policy GI3	Green Infrastructure Network
Policy GI6	New Open Space Provision
Allocation OS10	
Policy CC1	Renewable and Low Carbon Energy Generation and Storage
Policy CC2	Sustainable Design and Construction of New Development
Policy CC3	District Heating and Combined Heat and Power Networks
Policy T1	Sustainable Access
Policy T2	Strategic Public Transport Improvements
Policy T4	Strategic Highway Network Capacity Improvements
Policy T5	Strategic Cycle and Pedestrian Network Links and Improvements
Policy DM1	Infrastructure and Developer contributions



APPENDIX 9

HOUSING TRAJECTORY

ST15 Draft Delivery Trajectory
Regulation 19, 2018

Density

Year of Programme	Local Plan + Application				Planning Obtained		Reserved Matters & Infra		Housing Delivery																														
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35			
Calendar Year	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052			
Private Sales Outlets	-	-	-	-	-	2	2	3	3	4	4	4	4	4	4	4	4	4	4	4	4	3	2	2	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
Sales / outlet / month	-	-	-	-	-	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	
Private Sales per annum (70%)	-	-	-	-	-	72	72	108	108	144	144	144	144	144	144	144	144	144	144	144	144	108	72	72	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Affordable Housing (30%)	-	-	-	-	-	31	31	46	46	62	62	62	62	62	62	62	62	62	62	62	62	46	31	31	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Unit Delivery per annum	-	-	-	-	-	103	103	154	154	206	206	206	206	206	206	206	206	206	206	206	206	154	103	103	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Cumulative delivery of project	-	-	-	-	-	103	206	360	514	720	926	1,131	1,337	1,543	1,749	1,954	2,160	2,366	2,571	2,777	2,983	3,137	3,240	3,343	3,343	3,343	3,343	3,343	3,343	3,343	3,343	3,343	3,343	3,343	3,343	3,343	3,343	3,343	
Land required (hectares)	-	-	-	-	-	2.94	2.94	4.41	4.41	5.88	5.88	5.88	5.88	5.88	5.88	5.88	5.88	5.88	5.88	5.88	4.41	2.94	2.94	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Land required (acres)	-	-	-	-	-	7.26	7.26	10.89	10.89	14.52	14.52	14.52	14.52	14.52	14.52	14.52	14.52	14.52	14.52	14.52	10.89	7.26	7.26	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Residential land take	-	-	-	-	-	14.52	21.79	29.05	29.05	29.05	29.05	29.05	29.05	29.05	29.05	29.05	29.05	29.05	29.05	29.05	18.15	7.26	7.26	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

End of Plan Period

Langwith Draft Delivery Trajectory
Regulation 19, 2018

Year of Programme	Local Plan + Application				Planning Obtained		Reserved Matters & Infra		Housing Delivery																													
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35		
Calendar Year	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052		
Private Sales Outlets	-	-	-	-	2	2	3	3	4	4	4	4	5	5	5	5	5	5	5	5	4	4	4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Sales / outlet / month	-	-	-	-	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	
Private Sales per annum (70%)	-	-	-	-	72	72	108	108	144	144	144	144	180	180	180	180	180	180	180	180	144	144	144	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Affordable Housing (30%)	-	-	-	-	31	31	46	46	62	62	62	62	77	77	77	77	77	77	77	77	62	62	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Unit Delivery per annum	-	-	-	-	103	103	154	154	206	206	206	206	257	257	257	257	257	257	257	257	206	206	206	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Cumulative delivery of project	-	-	-	-	103	206	360	514	720	926	1,131	1,337	1,594	1,851	2,109	2,366	2,623	2,880	3,137	3,394	3,600	3,806	4,011	4,011	4,011	4,011	4,011	4,011	4,011	4,011	4,011	4,011	4,011	4,011	4,011	4,011	4,011	
Land required (hectares)	-	-	-	-	2.78	2.78	4.17	4.17	5.56	5.56	5.56	5.56	6.95	6.95	6.95	6.95	6.95	6.95	6.95	6.95	5.56	5.56	5.56	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Land required (acres)	-	-	-	-	6.87	6.87	10.31	10.31	13.74	13.74	13.74	13.74	17.18	17.18	17.18	17.18	17.18	17.18	17.18	17.18	13.74	13.74	13.74	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Residential land take (acres)	-	-	-	-	13.74	20.61	27.48	27.48	34.35	34.35	34.35	34.35	34.35	34.35	34.35	34.35	34.35	34.35	34.35	34.35	27.48	13.74	13.74	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

End of Plan Period



APPENDIX 10

PHASE 1 PREMINIARY RISK ASSESSMENT

REPORT N° 70011808-10617(2)

LANGWITH GARDEN VILLAGE

PHASE I PRELIMINARY RISK ASSESSMENT

SEPTEMBER 2016

LANGWITH GARDEN VILLAGE

PHASE I PRELIMINARY RISK ASSESSMENT

Sandby and Oakgate/Caddick Groups

Confidential

Project no: 70011808-10617(2)

Date: September 2016

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QUALITY MANAGEMENT

ISSUE/REVISION	FIRST ISSUE	SECOND ISSUE
Remarks	Version 1	Version 2 (following client comment)
Date	September 2016	September 2016
Prepared by	Emily Morgan/Mike Neden	Emily Morgan/Mike Neden
Signature		
Checked by	Paula Gallagher	Paula Gallagher
Signature		
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EXECUTIVE SUMMARY

General

Sandby and Oakgate/Caddick Groups commissioned WSP | Parsons Brinckerhoff to undertake a Phase 1 Preliminary Risk Assessment for a site located west of Elvington Lane, Elvington (the site). The purpose of the report is to provide information on the likely ground conditions and potential sources of ground/groundwater contamination, and assess the potential geo-environmental risks ahead of the proposed development.

The site is a proposed predominantly residential development area termed Langwith Garden Village located approximately 7km south-east of York City Centre. The site area totals 257.39Ha, comprising undeveloped agricultural land (plots A and D) and the former Elvington Airfield (plot C) (see Appendix B).

Plots A and D in the north-west have largely remained undeveloped with the exceptions of White House Farm and Langworth Lodge farm which have been present since circa 1930 and pre-1851 respectively. Localised areas of Made Ground are likely to be present in these plots, within in-filled ponds/ditches/water courses and in relation to the farms.

Plot C was undeveloped agricultural land (with Scotch Farm in the centre) prior to the development of Elvington Airfield in the 1940s. Historical fuel tanks have been identified in the south of plot C (information provided by the site owner suggests several tanks have been removed from this area). There is potential for other tanks to be/have been present in various locations within plot C. Made Ground is likely to be present across plot C in relation to the former airfield; within in-filled ponds/ditches/water courses; surrounding potential below ground tanks; relating to land raising shown to the north; and in relation to the landfill site that encroaches onto plot C in the north-east.

The Made Ground (where present) is likely to be underlain by predominantly low permeability superficial clays with localised areas of permeable superficial sand deposits, over sandstone bedrock.

Potential Environmental Constraints

The potential presence of areas of Made Ground (including off-site landfills and on-site unrecorded buried waste) and potential below ground/above ground fuel/chemical tanks and lines, gives rise to a number of potentially complete pollutant linkages, based on redevelopment for residential end use. A series of measures have been identified that could be required during/following redevelopment to mitigate potential risks to development workers and future site users, should contamination be present.

It is considered that the majority of the site has a low potential for significant soil and groundwater contamination. Localised areas (identified above) are considered to have a moderate potential for soil and groundwater contamination. The site is not classified as contaminated land under Part 2A of the contaminated land regime.

Intrusive ground investigation and risk assessment would enable the requirement for mitigation measures to render the site suitable for residential end use to be assessed.

Due to the previous use of the site as an air force base during WWII a potential risk from unexploded ordnance (UXO) should be assumed during any intrusive site investigation or future development.

Other environmental issues to consider include the presence of invasive species (e.g. Japanese Knotweed and Giant Hogweed) and given the potential for shallow groundwater, consideration needs to be given to flood risk and potential drainage plans for the development.

Potential Geotechnical Constraints

Potential geotechnical risks have been identified as, but may not be limited to, the following:

- Deep Made Ground and obstructions. Given the site's former use, below ground structures (e.g. basements and tanks) are likely to be present. It is noted that the Fennell, Green & Bates report makes reference to 12 aviation fuel tanks below the hard standing area to the south of the runways within plot C;
- Area of raised ground to the north of the runway on the eastern part of the site;
- In filled ponds have been identified on historical mapping. Based on past experience such features are often associated with very poor ground conditions.
- Near surface soils of potentially modest bearing capacity.
- High groundwater table which may impact the installation of foundations, drainage and other substructures.
- Potentially unstable ground conditions which may affect below ground excavations;
- Un-exploded ordnance (UXO) associated with historical use of the site as an airbase; and,
- Potential for localised increased levels of sulphates within the Made Ground associated with historical use.

Recommendations

Based on the data presented within this report it is recommended that an intrusive investigation is completed to confirm the depth of Made Ground, provide information on contamination and to fully assess geotechnical requirements for the design of foundations, pavements and roads. This will allow the preliminary Conceptual Site Model to be refined and the requirement for remedial measures that will facilitate residential development of this site to be assessed.

2 INTRODUCTION

2.1 AUTHORISATION

Sandby and Oakgate/Caddick Groups commissioned WSP | Parsons Brinckerhoff to undertake a Phase 1 Preliminary Risk Assessment for the site ('Langwith') located west of Elvington Lane, Elvington (henceforth referred to as the 'site'). A site location plan is provided in Figure 1, Appendix A.

2.2 AIMS AND OBJECTIVES

The objectives of the preliminary risk assessment are to provide information on the likely ground conditions and potential sources of contamination, and assess the potential geo-environmental risks associated with the site ground conditions ahead of the proposed development. The overall purpose of this report is to support the planning application for the site redevelopment.

This report includes a ground model, an assessment of potential risks associated with contamination due to the current and historical uses and a preliminary conceptual site model in accordance with Model Procedures for the Management of Land Contamination (CLR11).

2.3 BACKGROUND AND PROPOSED DEVELOPMENT

The site is part of a wider area of proposed development divided into nine plots of land; Plots A, B, C, D, H, H1, J, K and L (shown on the option for areas plan presented in Appendix B). The site referred to in this report comprises plots A, C and D. A site layout plan showing the position of the plots is provided in Figure 2, Appendix A.

The site is currently occupied by the now disused Elvington Airfield and agricultural fields/farmland.

An indicative development plan is provided in Appendix C and indicates that the site is proposed to be developed into predominantly residential properties and associated infrastructure with two primary schools and local amenity areas.

2.4 SOURCES OF INFORMATION

The report has been prepared using the information sources as listed below:

- Landmark Envirocheck reports (due to the large site area the report is divided into six areas (A-F) reference 95641417_1_1 dated 30 August 2016 (Appendix D).
- Unexploded Ordnance Preliminary Site Assessment reference E6387-16 dated 31 August 2016 (Appendix E).
- Fennell, Green and Bates 1992; 'Report on Land at RAF Elvington, near York'. Dated 14 December 1992; No report reference (henceforth referred to as "Fennell, Green and Bates 1992"). (Appendix F).
- City of York Council Contaminated Land Officer Response; dated 5 September 2016. (Appendix G).
- Animal and Plant Health Agency (APHA) Response; dated 12 September 2016 (Appendix H).
- British Geological Survey (BGS) geology viewer available online (accessed 02/09/2016).
- Coal Authority online interactive viewer (accessed 02/09/2016).

- BGS 1:50,000 Geological Maps, Sheet 71, Selby, Solid and Drift Editions.
- Online environmental data available on the Environment Agency (EA) website.
- Aerial imagery available online.
- Online information sources.

A site visit and walkover was not completed due to time constraints.

The York Council Planning Portal was also consulted for information on recent developments in the area; no relevant planning history is recorded in the vicinity of the site.

A request has also been made to the RAF Museum Research Centre to enquire if maps, plans or other information is held regarding the site. A response has not been received at the time of report production.

2.5 LIMITATIONS

General limitations of this assessment and information on the approach used are outlined in Appendix I.

3 SITE INFORMATION

Site Address	Land west of Elvington Road, Elvington (Former Elvington Airfield postcode YO41 4AU)
National Grid Coordinates	464800, 448070 (approximate centre of the site)
Plot Areas	Plot A: 101.64 Ha Plot C: 114.82 Ha Plot D: 40.93 Ha Total site area: 257.39 Ha
Site Location and Boundaries	The site is located approximately 7km south-east of York City Centre within a predominantly undeveloped agricultural area. The site is bounded by the following land uses: → North: Undeveloped agricultural land. → East: Yorkshire Air Museum and the Airfield Industrial Estate and agricultural land. → South: Woodland followed by York Mailing (commercial site) approximately 170m south, Blackwood's Farm and agricultural land. → West: Primrose Hill Farm, Langwith Farm and open agricultural land.
Current Site Use	The proposed allocation site is currently occupied by the now disused Elvington Airfield and agricultural fields/farmland.
Proposed Site Use	A current development plan for the site is provided in Appendix C and indicates that the site is proposed to be developed into predominantly residential properties (approximately 5000 over the four plots) with associated infrastructure; two primary schools (in Plots A and C); and an area of retail, employment and community uses (in Plot A).
Site Description	A site walkover had not been completed. The following site description has been generated from a review of online aerial imagery. Plot A: Land occupied predominantly by agricultural fields with a farm Langwith Lodge (comprising a farm house with two large barn buildings and one smaller outbuilding) in the centre, an access road to the farm runs from the west to the centre of the site. Plot C: Land occupied by the runway of the former Elvington Airfield with undeveloped grassed areas parallel to the runway, several access roads and an area of concrete hardstanding. Two former runway access roads are located in the north and south. A drainage ditch runs through the centre in a north/south orientation. A concrete hardstanding 'apron' is present in the south and the Fennell, Green and Bates 1992 report suggests below ground fuel tanks are/were located in this area. Plot D: Land occupied by White House Farm (comprising a farm house and five out buildings/barns) in the centre with an access road running from the south-west to the farm; the remainder of the plot is occupied by agricultural fields. It would be beneficial to undertake a site walkover in order to identify other evidence of contamination not apparent from aerial photography.

4 SITE SETTING AND HISTORY

4.1 PUBLISHED GEOLOGY

British Geological Survey (BGS) geological map Sheet 71, Selby, scale 1:50,000, Solid and Drift editions, show the site to be underlain by the geological units indicated in the table below:

GEOLOGICAL UNIT	DESCRIPTION	AQUIFER DESIGNATION
Sutton Sand Formation (localised deposits beneath Plot A only)	Fine-grained silty sand. Thickness: Up to 7m thick in vicinity of site.	Secondary Undifferentiated
Naburn Sand Formation	Mottled brownish yellow, yellowish brown, brown and grey-silty, gravelly sporadically clayey fine to coarse sand. Thickness: <0.5-2.5 in vicinity of site	Secondary Undifferentiated
Elvington Glaciolacustrine (localised deposits beneath Plot A only)	Firm to stiff, rarely soft, mottled reddish brown and grey thinly laminated clay. Sporadically interlaminated with silt and fine sand. Thickness: >5m in vicinity of site.	Secondary Undifferentiated
Vale of York Formation	Glacial Till (sandy clay, clayey sand and clay with gravel and boulders) with interbedded sand, gravel and laminated clays. Thickness: Up to 50m, generally 10-30m in vicinity of site.	Unproductive Strata
Sherwood Sandstone	Red, yellow-brown part pebbly sandstone; sub-ordinate red mudstone and siltstone. Thickness :> 1500m in vicinity of site.	Principal Aquifer

The BGS map shows Made Ground as follows:

- Land raised by fill on the northern boundary of plot C. Given that the maps specify land raising rather than land infilling, this Made Ground may relate to site preparation during the development of the airfield. The areas of land raised by fill are indicated on Figure 3.
- Three areas of infilled ground, the most significant located adjacent to the northern boundary of plot C. The areas of infilled ground are also indicated on Figure 3.

The BGS Geindex database shows no boreholes within the immediate vicinity of the site; however, records are present for boreholes located more than 250m from the site. Details are provided below:

BGS borehole referenced SE64NE5 (approximately 300m south of plot C), encountered sand, clay and sand/gravel interpreted to be the Naburn Sand Formation to 4.26 metres below ground level (m bgl) underlain by boulder clay (currently referred to as Glacial Till), sand and clay to 28.65m bgl interpreted to be the Vale of York Formation; over sandstone to 48.76m bgl, the full depth of drilling.

BGS borehole referenced SE64NW203 (approximately 750m west of plot D), encountered loose brown sand interpreted to be the Naburn Sand Formation to 3.0m bgl, before interbedded layers of brown boulder clay (Glacial Till) with rounded chalk cobbles, silty clay and sand/gravel is recorded to 25.5m bgl interpreted to be the Vale of York Formation; grey sandstone was then recorded to 60m bgl the full depth of drilling.

A previous site investigation undertaken by Fennell, Green and Bates 1992 (presented in Appendix F of this report) drilled fourteen boreholes (Boreholes A-L) of which seven boreholes (Borehole F to Borehole L) were drilled on plot C. Boreholes were drilled to between 7.5m bgl (Borehole H and Borehole I) and 8.6m bgl (Borehole 'F'); a borehole location plan is included within the Fennell, Green and Bates 1992 report. Made Ground was not recorded in any of the boreholes. All boreholes encountered superficial deposits described as silty clay, sandy clay and soft sand, interpreted to be the Naburn Sand Formation, to depths of between 4.5m bgl (Borehole 'H') and 6.1m bgl (Borehole 'K'). 'Boulder Clay', interpreted to be the Vale of York Formation, was recorded beneath the Naburn Sand Formation in all seven boreholes to a maximum depth of 8.6m bgl (Borehole 'F'). Groundwater was recorded at an average standing water depth of 1.15m bgl.

4.2 MINING AND MINERAL SITES

The Envirocheck Report indicates plot C is within an area potentially affected by coal mining. A review of the Coal Authority Online Interactive Viewer indicates that the nearest development high risk area is located approximately 3.5km south-west of the site. It is likely to be associated with two mine entries. The nearest surface mining, past shallow coal mine workings and probable shallow mine workings are all located over 25km south-east of the site. Given the distance of these features from the site and it is unlikely that there is a risk from coal mining.

The Envirocheck Report indicates that four former mineral sites (operations now ceased) are located within 1km of the site:

- Elvington Airfield, located approximately 50m to the north of plot C. Opencast mining of Sand.
- Langwith Farm House Sand Pit, located approximately 260m south of plot A and 500m west of plot C. Opencast mining of Sand.
- Cannon House Sand Pit, located approximately 540m south of plot C. Opencast mining of Sand.
- Dunnington Lodge Marl Pits, located approximately 830m north of plot A. Opencast mining of Common Clay and Shale.

4.3 LANDFILLS

Information provided by the City of York Contaminated Land Officer (presented in Appendix G) indicates the presence of two landfills in the immediate vicinity of the site as follows:

- Drome Farm, which encroaches onto the north-east corner of plot C and is predominantly off-site to the north of plot C. This landfill was categorised as A6 (landfill accepting other wastes) and was operational from 1988 to 2015.
- Elvington Airfield Landfill, located adjacent to the south east corner of plot C, also categorised as A6 and operational between 1992 and 2013.

The landfills are indicated on Figure 3.

4.4 RADON

The Envirocheck Report indicates the area is in a lower probability radon area with less than 1% of homes above the action level and that no radon protection measures are necessary in the construction of new dwellings or extensions.

4.5 HYDROGEOLOGY

The Sutton Sand Formation, the Naburn Sand Formation and the Elvington Lacustrine Formation are classified as Secondary Undifferentiated Aquifers and the Vale of York Formation is classified as Unproductive Strata. The Sherwood Sandstone Formation is classified as a Principal Aquifer.

Four groundwater abstractions (listed below) are located within 1km of the site; none of the abstractions are for potable water.

- Dodsworth Farm approximately 330m south of plot C for the abstraction of groundwater from the Sherwood Sandstone for General Farming and Domestic.
- Tillmere Farm approximately 440m south-west of Plot D for the abstraction of groundwater from the Sherwood Sandstone for General Farming and Domestic.
- Canon House Farm (William Birch & Sons Ltd) approximately 550m south of plot C for the abstraction of groundwater from the Sherwood Sandstone for General Agriculture: Spray Irrigation.
- Blackwoods Farm approximately 750m south-west of plot C for the abstraction of groundwater from the Sherwood Sandstone for General Farming and Domestic.

The site is not within a groundwater Source Protection Zone, as defined by the Environment Agency.

4.6 HYDROLOGY

A number of drainage features and other surface water features including ditches and ponds are shown on mapping to be present on all four plots. A review of historical maps indicates the position and presence of these features varies over time and it is therefore likely that some have been infilled or expanded and new drainage features have been created.

Two labelled surface water drains (Tilmire and Langwith Drains) are located adjacent to the north of plot D and along the boundary between plots A and D respectively, trending in a north-east/south-west orientation. Surface water drainage ditches within plots A and D are indicated to flow into these two drains. Both drains are shown to flow in a south-westerly direction eventually joining Bridge Dyke, which drains into the River Ouse located approximately 5km west of the site.

No surface water abstractions are recorded within 1km of the site.

4.7 SENSITIVE LAND USE

The Envirocheck Report has identified the site is within an area of Unadopted Green belt and a Nitrate Vulnerable Zone. No other Sensitive Land Uses have been identified within 1km of the site.

4.8 SITE HISTORY

Plots A and D in the north-west have remained largely undeveloped agricultural land since earliest mapping dated 1851 to the present day. Langwith Lodge farm is shown to have been present in the centre of plot A from the earliest available maps dated 1851 to present and White House Farm is shown to have been present in the central part of plot D from circa 1930 to present.

Earliest available maps from 1851 shows plot C was occupied by agricultural fields with Scotch Farm in the centre. The map from 1952 indicates an Airfield in plot C, though no buildings or infrastructure detail is provided on the plan. The map dated 1972 indicates Elvington Airfield, with runways, aprons, taxi-ways and other hardstanding areas across plot C, with very few structures

indicated on the plan. Airfield infrastructure extends off site to the north, south-east and south-west of the two plots.

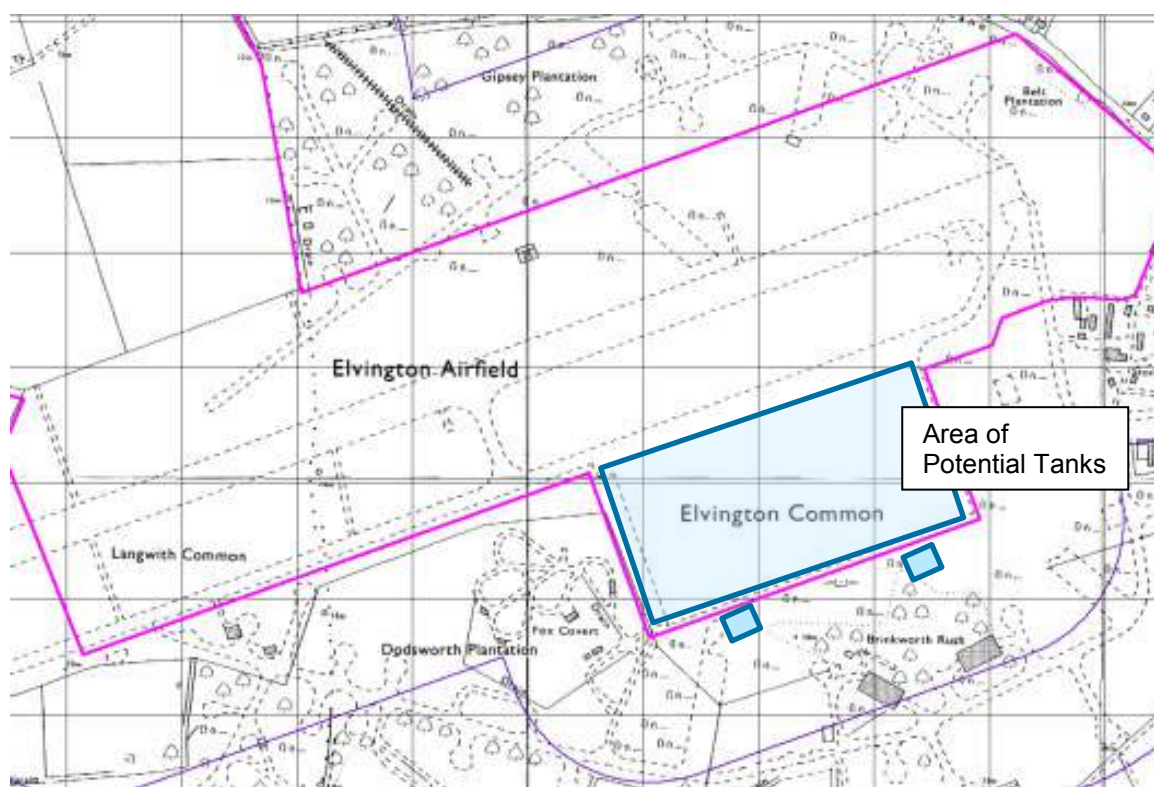
Information available online suggests that the airfield originally had grass runways and that asphalt runways and associated ancillary roads and airport infrastructure were installed in the early 1940s. The airfield is understood to have been used by the Royal Air Force (RAF) during WWII after which it was expanded by the United States Air Force (USAF) to include a >3000m long runway and hardstanding apron in the south of plot C. The airfield is understood to not to have become an operational USAF base but was used by the RAF and small commercial aircraft companies until its closure in 1992.

The Fennell, Green & Bates report completed for the site in December 1992 refers to the presence of 12 below ground aviation fuel tanks beneath the hardstanding apron in the south of plot C (see map below) and highlighted on Figure 3, in Appendix A. Information provided by the site owner (email dated 23-8-16) indicates that a number of tanks were located in two areas to the south of the concrete pad and have been removed (see map below and Figure 3).

Evidence on the historical maps indicates other structures/features on plot C that may potentially indicate the presence of above or below ground tanks. Notable potential tank locations are in the north-east and west of plot C, adjacent to the north of plot C and off-site to the south of plot C.

The farm buildings on the site may potentially have/have previously had above or below ground tanks for fuels or farming chemicals.

The layout of the airfield in the 1972 map extract is shown below; the area of the potential below ground tanks referred to in the Fennel Green & Bates report is marked on the map.



4.9 REGULATORY INFORMATION

The Contaminated Land Officer (CLO) for the City of York's public protection service was contacted regarding the site for any pertinent environmental information. The reply (letter and report) from Lucie Hankinson dated 5 September 2016 (Ref: RSA/LVH/188501) is included as Appendix G.

The site has not been determined as "Contaminated Land" under Part 2A of the Environmental Protection Act 1990 at the present time. Due to the previous activities of the site; the airfield and landfill sites are all included on the Council's list of potentially contaminated sites and have been assigned a medium to high priority in line with the Council's contaminated land strategy.

The CLO provided information on landfills at the site (detailed in section 3.4) and confirmed the site has been an airfield since the 1950s. No information was given on the location of potential underground storage tanks. The CLO letter suggested that various areas of unknown filled ground (i.e. infilled ponds or streams) were also located on the site.

Other regulatory information for the site is contained within the Envirocheck Report for the site and is summarised in Table 3-1 below.

Table 4-1 Regulatory Information Langwith

ISSUE	DETAILS
Pollution Incidents to Controlled Waters (PICW)	There are two recorded incidents to controlled waters within 500m of the site, the closest of these is for a Domestic Property, 201m north-east which released unknown sewage to freshwater stream/river and the second is an industrial site at Kexby Bridge, 365m north-west, oils-diesel into freshwater stream/river.
Discharge Consents (DC)	There are no current discharge consents within 500m of the site.
Integrated Pollution Prevention and Control (IPPC)	One IPPC is recorded within 500m of the site; this is located 180m south at York Mailing (print works) – Status Permit Issued.
Local Authority Pollution Prevention Controls (LAPPC)	Three LAPPCs are recorded within 500m of the site. The closest of these is York Mailing (PG6/16 Printworks) located 180m south; the second is A1 Plant and Haulage, 200m north-east (PG3/16 Mobile screening and crushing processes) and the third is York Direct Ltd, 219m east (PG6/16 Printworks).
Fuel Station Entries	There are no fuel station entries within 500m of the site.
Contemporary Trade Directories (CTD)	There are twelve active CTDs within 1km; the nearest 35m north-east and relates to V L & M C Rookes which is a Meat Product Manufacturers and Wholesalers.
Points of Interest – Commercial Services	Seven points of interest are located within 500m of the site. The nearest of these is located 200m north-east - A1 Plant and Haulage, Drome Farm.

4.10 UNEXPLODED ORDNANCE (UXO)

A pre-desk study assessment in relation to potential unexploded ordnance at the site was produced by Zetica UXO for WSP | Parsons Brinckerhoff dated 31 August 2016. The study indicates *'that RAF Elvington was bombed during at least 1No. air raid'*. The report concluded that the site comprises part of a former operational military airfield, which provided several potential sources of UXO hazard. A detailed desk study was recommended to further assess the UXO risk level of the site.

4.11 BURIED SERVICES/BELOW GROUND FEATURES

Given the nature of the site and the information provided within the Fennell, Green and Bates report indicating the presence of below ground tanks it should be assumed that buried services, below ground tanks and related tank infrastructure is present at the site and appropriate service clearance should be undertaken prior to any intrusive investigation. The WSP | Parsons Brinckerhoff report (160831 70011808-rpt-002-Langwith Utilities Energy Technical Appraisal 1 Rev 1) should be consulted regarding the location of buried services prior to the design of any intrusive investigation for the site.

4.12 OTHER ENVIRONMENTAL ISSUES

Other environmental issues to consider include the presence of invasive species (e.g. Japanese Knotweed and Giant Hogweed) and given the potential presence of shallow groundwater, consideration needs to be given to flood risk and potential drainage plans for the development.

There is potential for low level radiological contamination (comprising radium 226 and uranium) relating to the sites former use as an airfield. Radiological contamination relates to metal objects (e.g. instrument dials) or contaminated ash (from the burning of waste). Areas of greatest risk include an areas used for maintenance and repair, the airbase perimeter and an areas of landfilling.

Correspondence with the APHA indicates no records of burials exist for the proposed development area. The response from the APHA is presented in Appendix H.

5

PRELIMINARY CONTAMINATION ASSESSMENT

5.1 GROUND MODEL SUMMARY

The preliminary ground model has been developed using published data, previous site investigation and observations made from aerial imagery. As already discussed, a site walkover has not been completed and therefore there may be specific potential sources of contamination at the site that have not been identified by this desk-based study.

Localised areas of Made Ground are likely to be present in Plots A and D associated with in-filled ponds/ditches/water courses and in relation to Langwith Lodge farm in the centre of Plot A. Made Ground is likely to be present across plots C associated with the former airfield; within in-filled ponds/ditches/water courses; around potential below ground tanks; associated with historical land-raising to the north of plot C; and in relation to the landfill site that encroaches onto plot C in the north-east. There is the potential for contaminants to be present within material used to fill or raise ground.

The Made Ground (where present) is likely to be underlain by a mixture of relatively permeable granular (sand) and less permeable cohesive (clay) deposits over a sandstone Principal Aquifer.

Groundwater may be present at shallow depth and there are numerous surface water features across the site.

Mobile contamination would likely migrate relatively easily through more permeable sand layers and therefore the groundwater and surface water environment would be considered to be relatively vulnerable to contamination. The presence of the low permeability clay strata between the permeable sand layers and the bedrock may limit migration of potential contamination to the underlying bedrock.

5.2 POLLUTANT LINKAGE ASSESSMENT

The potential sources of contamination, receptors that could be impacted and pathways, via which sources and receptors may be connected, are described below. These pollutant linkages assume redevelopment of the site for the most sensitive end use; residential houses with gardens.

Potential Sources of Contamination

- Potential soil/groundwater contamination associated with spills/leaks from the 12 below ground aviation fuel tanks (noted in the Fennell, Green & Bates report); although information provided by the client indicates these tanks were located to the south of the concrete pad and have been removed.
- Potential soil/groundwater contamination from historical spills/leaks of liquids from other as yet unidentified above or below ground tanks associated with the field or on the farms.
- Potential localised soil contamination (including asbestos) within materials used to infill ponds, raise levels or within areas of possible buried waste.

- Potential hazardous ground gas generated by significant depths and areas of infill materials on site or associated with the off-site landfills to the north (which encroaches into the northern part of plot C) and to the south.
- Potential vapours associated with volatile soil/groundwater contamination.
- Radiological contamination associated with disposal of radioactive materials (e.g. old aircraft dials) during former use as an airbase.

Potential Receptors

Based on the site being redeveloped for a residential end use the potential human health receptors are considered to include;

- Construction workers and adjacent site users during redevelopment.
- Future residents and maintenance workers.
- Proposed building infrastructure such as plastic potable water pipes and below ground concrete.
- Underlying Secondary Undifferentiated Aquifer and Principal Aquifer (groundwater).
- Surface waters (ditches/water courses and ponds) leading to Tilmire Langwith Drains.

Potential Exposure Pathways

Relevant potential pathways are considered to include:

- Direct contact, incidental ingestion and inhalation of soil bound contaminants / dust.
- Volatilisation of vapours from impacted soil and/or groundwater and subsequent vapour intrusion into buildings leading to vapour inhalation.
- Accumulation of ground gases into buildings resulting in potentially explosive / asphyxiating atmosphere.
- Permeation of contamination into unprotected water supply pipes.
- Leaching of contamination into groundwater followed by migration of groundwater to the wider groundwater environment or surface waters.

Potentially Complete Pollutant Linkages / Preliminary Conceptual Site Model (CSM)

Given the potential sources, sensitive receptors and pathways, the potentially complete pollutant linkages that could arise assuming redevelopment of the site with residential housing include the following:

1. Direct contact, ingestion or inhalation of soil-bound contamination during redevelopment by construction workers and neighbouring site users.
2. Direct contact, ingestion or inhalation of soil-bound contamination by future site users and maintenance workers, following redevelopment.
3. Inhalation of ground gases by construction workers during redevelopment and future site users following redevelopment.
4. Inhalation of vapours associated with ground contamination by construction workers, future site users and neighbouring site users following redevelopment.
5. Migration of mobile contamination to surface waters and the wider groundwater environment.

6. Direct contact between contamination in soil / groundwater and future below ground structures.

5.3 POTENTIAL MITIGATION MEASURES

Based on the preliminary Conceptual Site Model (CSM), examples of risk management measures that could be required during redevelopment to mitigate the risks associated with the potentially complete pollutant linkages (listed above) are provided in the table below.

COMPLETE POLLUTANT LINKAGE	EXAMPLE OF MITIGATION MEASURE FOR RE-DEVELOPMENT
1	Use of standard Personal Protective Equipment (PPE) and hygiene practises during redevelopment by construction workers and provision of dust suppression measures to reduce dust generation.
2	Removal of impacted materials and / or provision of a suitable thickness of a clean cover soil in gardens and landscaped areas.
3	Gas monitoring prior to redevelopment. Removal of impacted materials and / or provision of gas resistant membranes within properties to protect future users.
4	Vapour monitoring prior to redevelopment. Removal of impacted materials and / or provision of vapour resistant membranes within properties to protect future users.
5	Removal of impacted soil / groundwater and provision of groundwater remediation system.
6	Potential for barrier pipe to be required for drinking water supply. Potential for sulphate resistant concrete to be required in below ground structures.

Following investigation and risk assessment the requirement for any mitigation measures could be identified. It is not considered that any contaminant linkages are likely to be present that following mitigation would preclude the site from residential development.

6

PRELIMINARY GEOTECHNICAL CONSTRAINTS ASSESSMENT

6.1 LIKELY GROUND CONDITIONS

Borehole records included in the Fennell, Green & Bates report suggest that silty/sandy clays and sands may be encountered around the former airbase (Plot C) at shallow depth either below an upper layer of Made Ground and/or Topsoil. It is noted that some of the boreholes refer to “soft” conditions, although as this description is applied to both granular and cohesive soils, the geotechnical merit of the logs may be questionable. The report does suggest that the average standing groundwater level was 1.15m, which is not significantly greater than the likely minimum foundation depth (see below).

An area of raised ground is shown on the eastern part of the site, immediately to the north of the runway. Due to quality of the logs provided the nature and thickness of any placed soils is unknown.

On the western half of the site and to the north of the airfield, it is likely that shallow ground conditions comprise mixed drift deposits. The presence of drains and “issues” in the area also suggests a high groundwater table.

6.2 FOUNDATIONS & FLOOR SLABS

The development is likely to predominantly comprise residential dwellings with a limited amount of retail development and schools. At present, only a Masterplan is available (presented in Appendix C) and the exact form of any structures and loadings are unknown.

Based on the available data, it is considered that over the majority of the site, conventional spread foundations (e.g. strips, trench fill and pads), bearing within the natural drift deposits are likely to be suitable for two/three storey houses and low level portal framed structures (e.g. retail units). It is not considered unreasonable to assume a safe bearing pressure in the region of 75-100kN/m² for preliminary design purposes. However, where the depth of any Made Ground or unsuitable soils exceeds 1m, such foundations may prove impractical due to potential groundwater and stability issues.

Specific attention is drawn to the area of raised ground to the north of the runways. Foundation design in this area will depend on the thickness and nature of any fill placed and it may be prudent to assume that conventional foundations will be unsuitable until proven otherwise by ground investigation.

Where conventional foundations are suitable a minimum foundation depth of 0.9m should be assumed at this stage. Depending on the plasticity of any near surface clay or the distribution of granular soils, this depth may be reduced.

If potentially shrinkable clay soils are present, some consideration may need to be given to the presence of trees, which are largely present along the existing field boundaries. This may require foundations to be deepened in accordance with NHBC recommendations.

In areas where the depth of poor/Made Ground is excessive, the removal of significant below ground structures has occurred or loadings preclude the use of spread foundations, alternative foundations may be required. These may comprise;

- Piled foundations (pre-cast, driven piles may provide the most economical solution if noise and vibration issues can be mitigated).
- Ground improvement using stone columns.

6.3 EARTHWORKS

The requirement for any earthworks to be undertaken is unknown. If earthworks are required, then the near surface soils may not be suitable for reuse in their as-dug form, particularly if excavated from close to, or below the groundwater table. Lime/cement modification may be suitable to treat excavated soils prior to compaction.

Care would need to be taken to ensure that any reduction in ground level did not intersect the groundwater table or have an adverse effect on foundation design.

6.4 ROADS/HARD STANDINGS & DRAINAGE

It is anticipated that, following Topsoil removal, Made Ground, granular or cohesive superficial soils will be encountered at subgrade level across the site.

Pavement design will be dependent on the California Bearing Ratio (CBR) achieved for the prepared formation. CBR values may be poor for the natural soils, particularly any clays, and it is recommended that a CBR of <2.5% is assumed at this stage. The option may exist to use lime and/or cement modification to increase the formation CBR.

Based on current information it seems unlikely that soakaway type drainage will be feasible on the site.

6.5 OBSTRUCTIONS/RELICT STRUCTURES

The risk of encountering below ground obstructions is considered significant in plot C. Obstructions such as basements, foundations, taxiways/hard standings, tanks and floor slabs are likely to be related to former development. A detailed strategy for obstruction removal should be implemented by the contractor to ensure that abnormal costs are appropriately managed.

6.6 MATERIAL REUSE

The Fennell, Green & Bates report states that the removal of the runways and associated hard standing may yield 387,000 tonnes of concrete. This could be processed for use on the site (e.g. as capping for roads).

Approximately 49,000 tonnes of fill was also estimated to be present beneath paved areas. The materials seem somewhat variable, with descriptions including “*chalky stone*” (assumed chalk), “*broken limestone*”, “*broken rubble*” and “*soft sand*”.

It was also estimated that approximately 38,000 tonnes of asphalt may be generated. In theory, recycled bituminous planings and granulated asphalt may be used as capping (SHW Series 600 Class 6F3), or Type 4 sub base, although there is a strict limit on bitumen content (10%), which can be a problem with older asphalts.

It is strongly recommended that some suitability testing is undertaken on sources of potentially recycled aggregates at an early stage.

6.7 GROUNDWORKS

The stability of the near surface soils should not be relied upon in open excavation. Zones loosened by the removal of substructures may be particularly unpredictable and prone to collapse. Safe working conditions should be ensured at all times where persons are required to work in any excavations. This could be achieved by the use of ground support or cutting batters to safe angles.

Groundwater should be anticipated with 1m of existing ground level and this, coupled with the unstable nature of the soils, may make the installation of deeper infrastructure such as manholes and service runs problematic.

It is considered that sump pumping, with appropriate measures to mitigate fines removal, may prove effective for small head reductions (less than 1m) in localised excavations. Deeper and more extensive excavations may require the use of well pointing.

6.8 AGGRESSIVE GROUND CONDITIONS

Whilst the natural ground is unlikely to pose significant risk to buried concrete, elevated sulphate concentrations may be associated with the Made Ground and could require a more onerous concrete design sulphate class, although conditions exceeding DS3 are considered unlikely.

6.9 UNEXPLODED ORDNANCE

As discussed in **Section 3.11**, consideration of potential UXO risk should be taken into account during any ground investigation and future groundworks.

7 CONCLUSIONS AND RECOMMENDATIONS

7.1 CONCLUSIONS

Environmental

The potential presence of areas of Made Ground (including off-site landfills and on-site unrecorded buried waste) and potential below ground/above ground fuel/chemical tanks and lines, gives rise to a number of potentially complete pollutant linkages, based on redevelopment for residential end use. A series of measures have been identified that could be required during/following redevelopment to mitigate potential risks to development workers and future site users, should contamination be present.

It is considered that the majority of the site has a low potential for significant soil and groundwater contamination. Localised areas (identified above) are considered to have a moderate potential for soil and groundwater contamination. The site is not classified as contaminated land under Part 2A of the contaminated land regime.

Intrusive ground investigation and risk assessment would enable the requirement for mitigation measures to render the site suitable for residential end use to be assessed.

Due to the previous use of the site as an air force base during WWII a potential risk from unexploded ordnance (UXO) should be assumed during any intrusive site investigation or future development.

Other environmental issues to consider include the presence of invasive species (e.g. Japanese Knotweed and Giant Hogweed) and given the potential for shallow groundwater, consideration needs to be given to flood risk and potential drainage plans for the development.

Geotechnical

Potential geotechnical risks have been identified as, but may not be limited to, the following:

- Deep Made Ground and obstructions. Given the site's former use, below ground structures (e.g. basements and tanks) are likely to be present. It is noted that the Fennell, Green & Bates report makes reference to 12 aviation fuel tanks below the hard standing area to the south of the runways ;
- Area of raised ground to the north of the runway on the eastern part of the site;
- In filled ponds have been identified on historical mapping. Based on past experience such features are often associated with very poor ground conditions.
- Near surface soils of potentially modest bearing capacity.
- High groundwater table which may impact the installation of foundations, drainage and other substructures.
- Potentially unstable ground conditions which may affect below ground excavations;
- Un-exploded ordnance (UXO) associated with historical use of the site as an airbase; and,

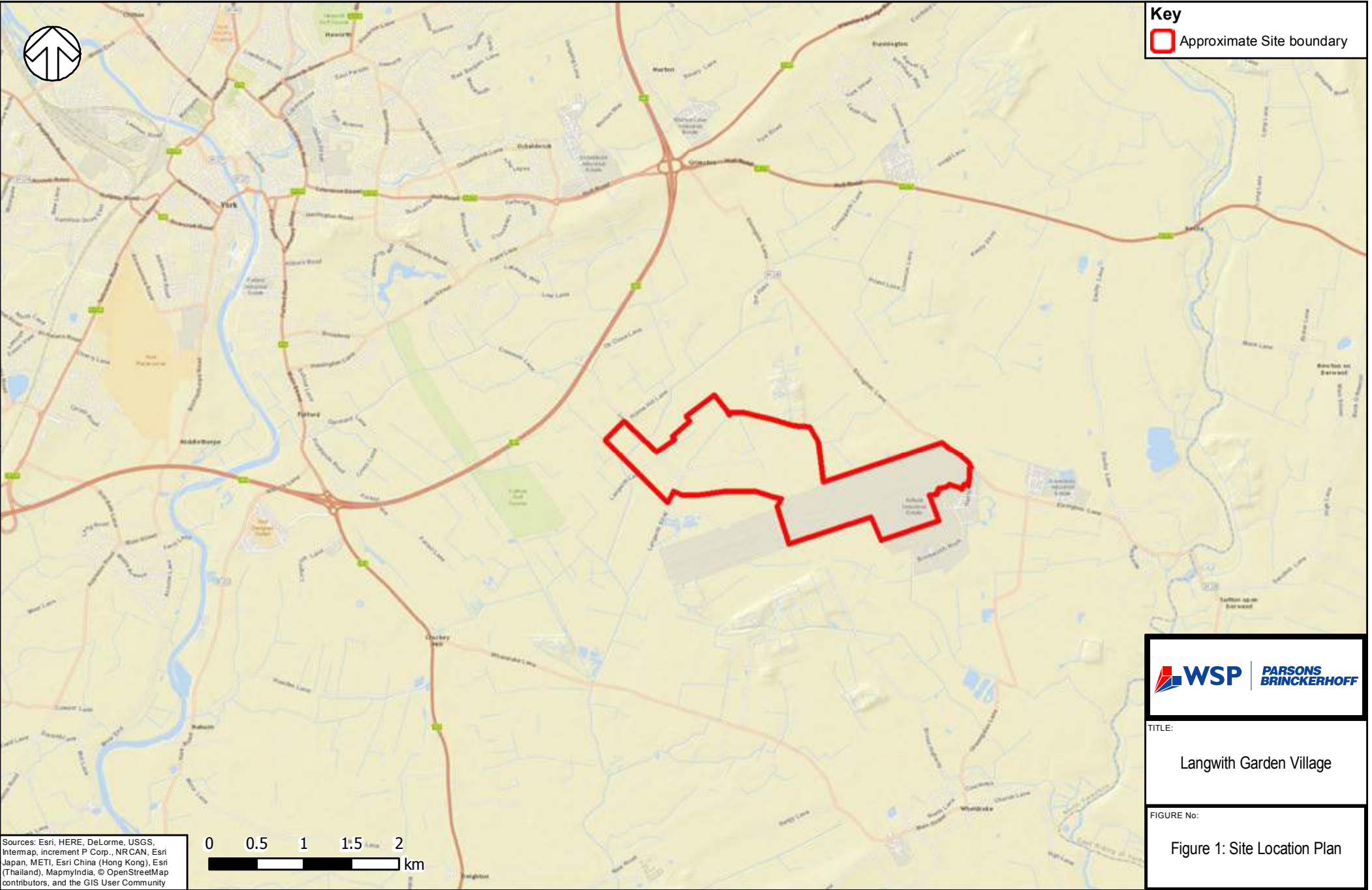
- Potential for localised increased levels of sulphates within the Made Ground associated with historical use.

7.2 RECOMMENDATIONS

Based on the data presented within this report it is recommended that an intrusive investigation is completed to confirm the depth of Made Ground, provide information on contamination and to fully assess geotechnical requirements for the design of foundations, pavements and roads. This will allow the preliminary Conceptual Site Model to be refined and the requirement for remedial measures that will facilitate residential development of this site to be assessed.

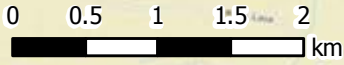
Appendix A

FIGURES



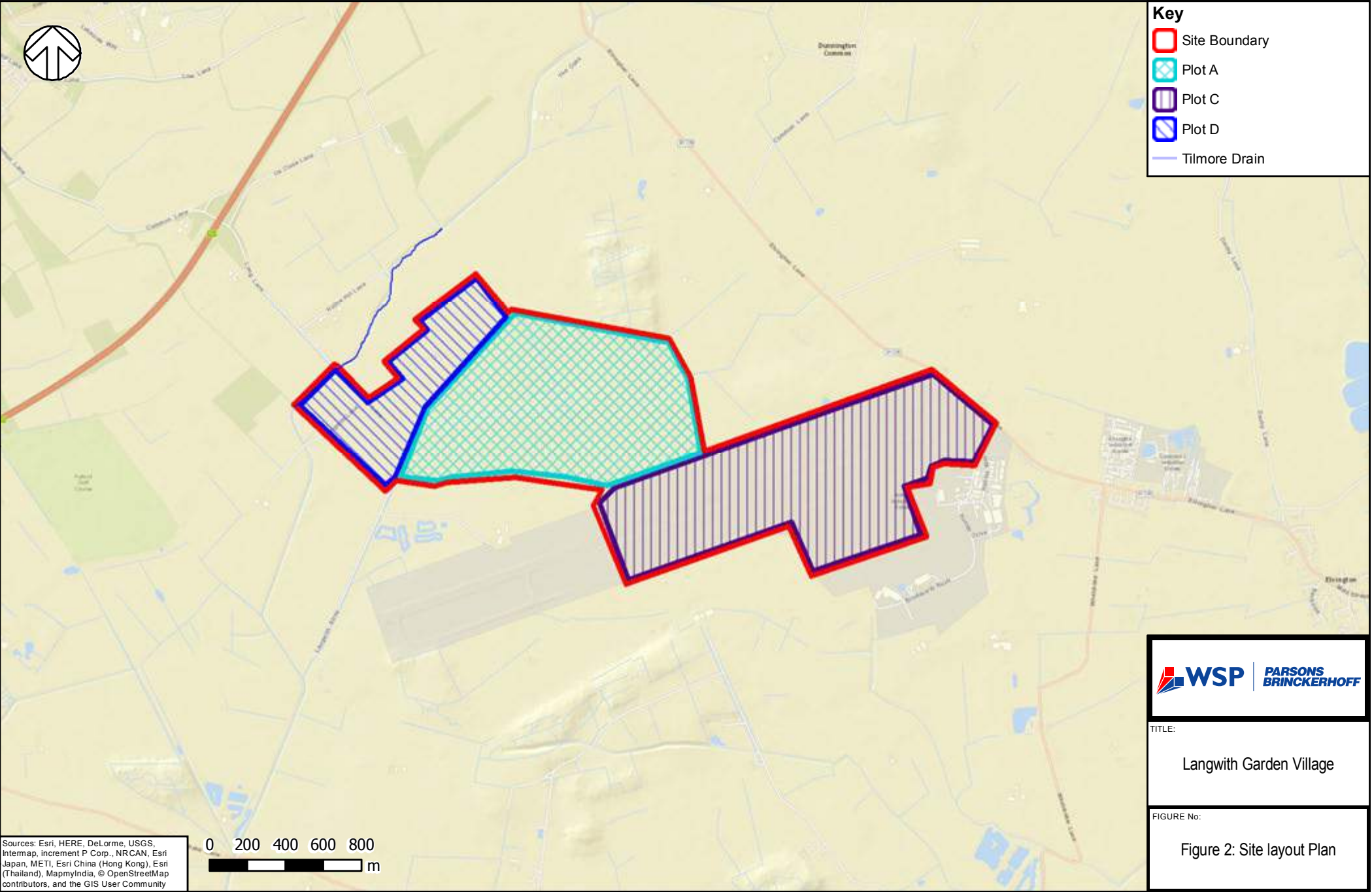
Key
 Approximate Site boundary

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), MapmyIndia, © OpenStreetMap contributors, and the GIS User Community








TITLE:
 Langwith Garden Village

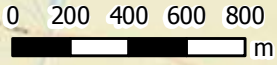
FIGURE No:
 Figure 1: Site Location Plan



Key

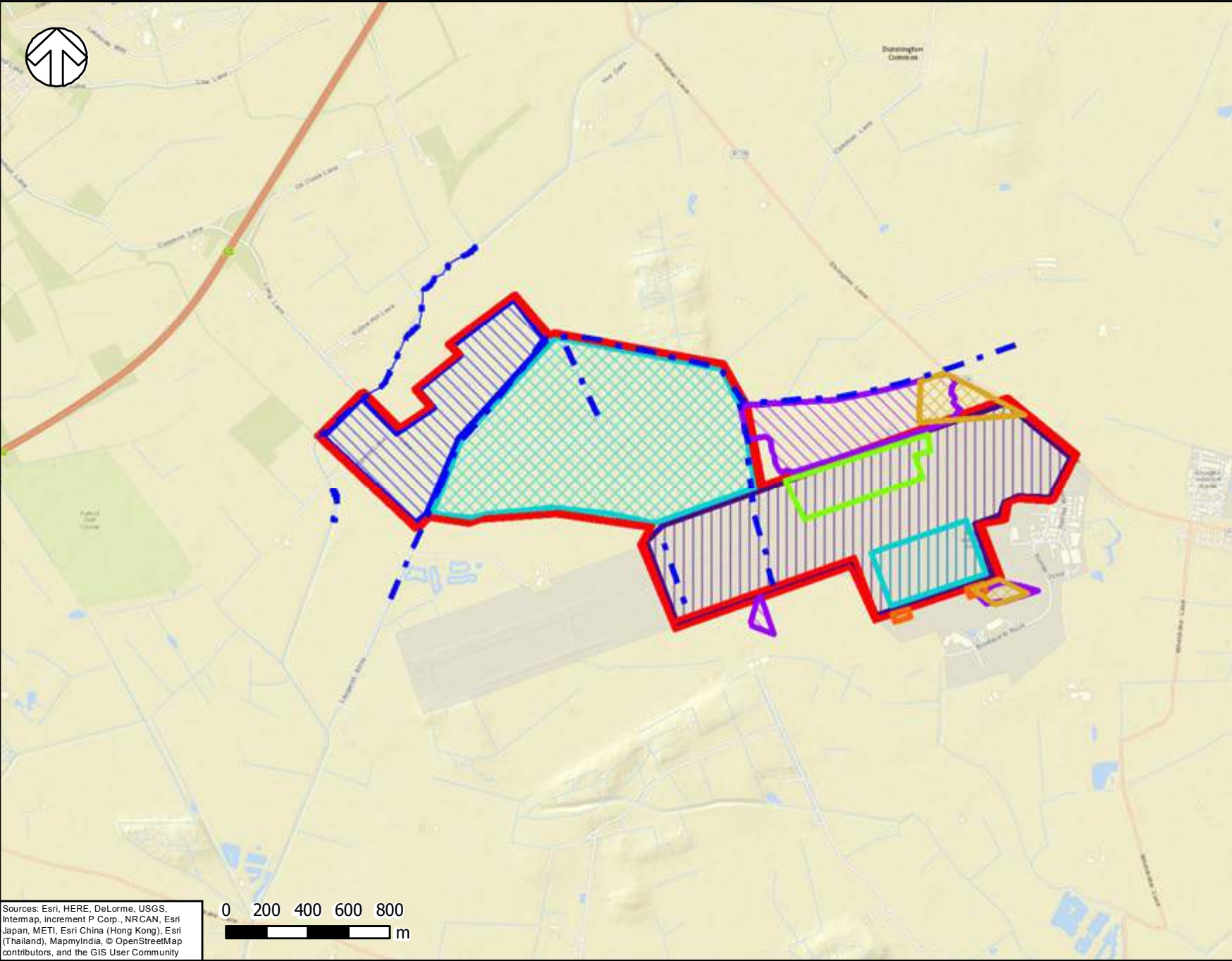
-  Site Boundary
-  Plot A
-  Plot C
-  Plot D
-  Tilmore Drain

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), MapmyIndia, © OpenStreetMap contributors, and the GIS User Community













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Langwith Garden Village

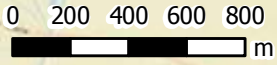
FIGURE No:
Figure 2: Site layout Plan



Key

-  Approximate site boundary
-  Plot A
-  Plot C
-  Plot D
-  Former above ground tanks
-  Potential Landfills
-  Surface water/drain
-  Landfills (from council and Envirocheck maps)
-  Apron area - area of possible underground fuel storage tanks (previous report)
-  Area of land raising (from BGS maps)

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), MapmyIndia, © OpenStreetMap contributors, and the GIS User Community



TITLE:
Langwith Garden Village

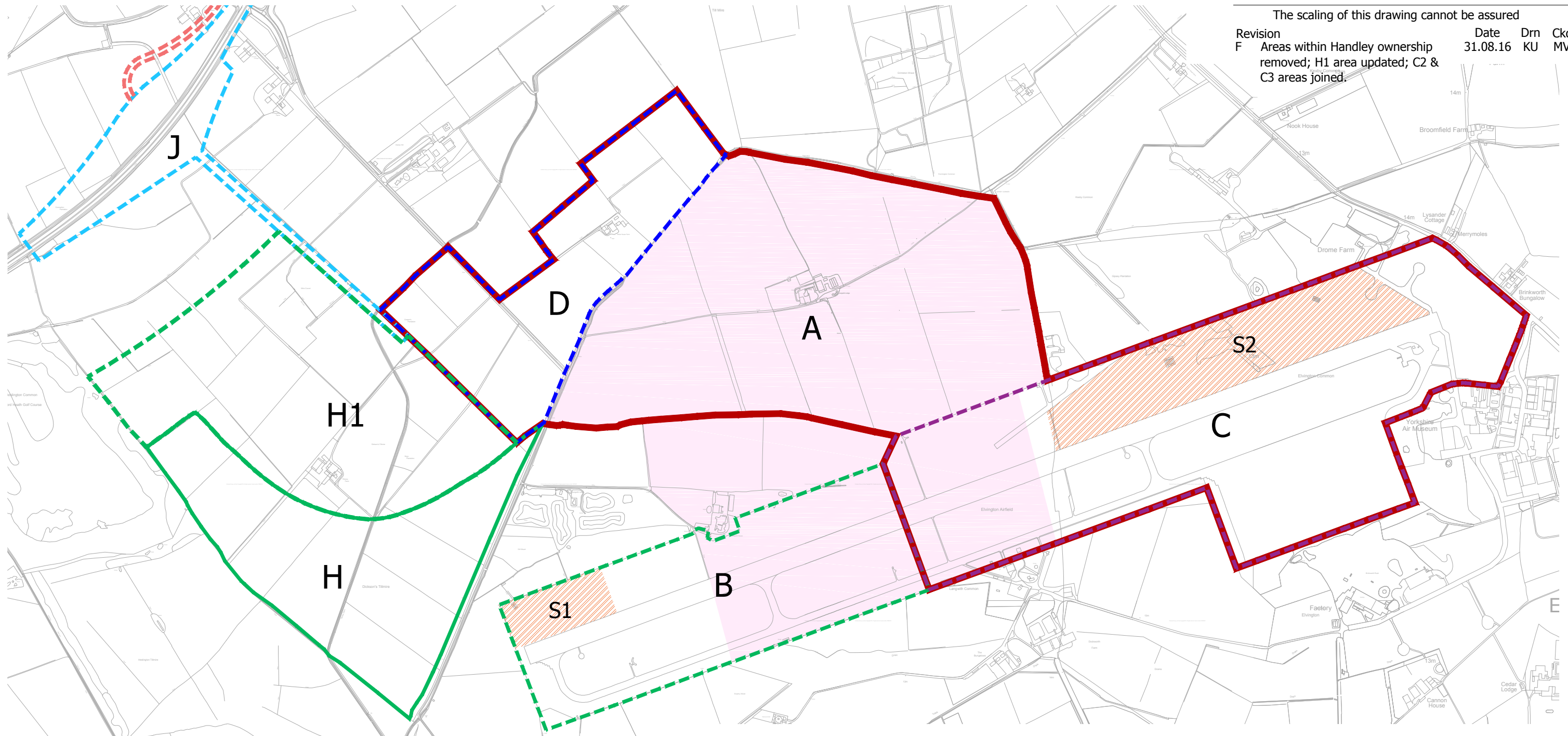
FIGURE No:
Figure 3: Site Features Plan











Appendix B

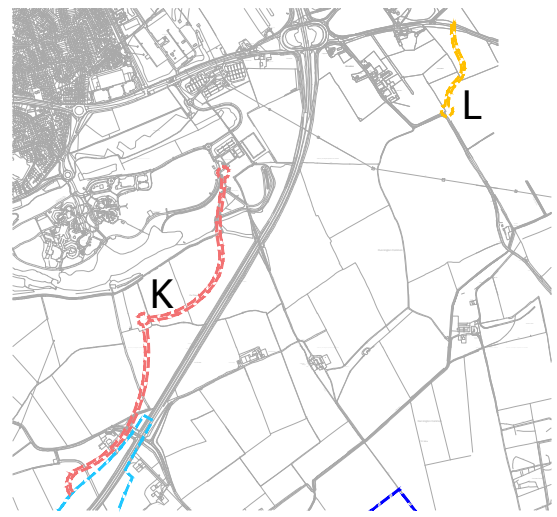
OPTION FOR AREAS PLAN

The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
F Areas within Handley ownership removed; H1 area updated; C2 & C3 areas joined.	31.08.16	KU	MV



-  SINC
-  ST15 Draft Allocation (171.53Ha 3,602 dwellings) (development area)
-  Application Boundary
-  Potential additional development (Land is deliverable and developable)
-  Potential additional development subject to satisfactory offsetting and design transition from dwellings to employment
-  Habitat Enhancement Area
-  Potential additional ecological offsetting areas
-  Junction and road to A64
-  University of York & Hull Road Link
-  Elvington Lane Re-Alignment



Areas K & L

Parcel	Ownership	Area	Estimated number of dwellings (60% @ 35 dph)
A	Halifax Estates	101.64 Ha	2134
B	Mr Shand	54.96 Ha	N/A
C	Mr Shand	114.83 Ha	2411
D	Halifax Estates	40.92 Ha	859
H	Halifax Estates	46.43 Ha	N/A
H1	Halifax Estates	63.00 Ha	N/A
J	Halifax Estates / Highways	18.63 Ha	N/A
K	University of Hull & York Road Link	4.50 Ha	N/A
L	Elvington Lane Re-Alignment	1.00 Ha	N/A
Total	-	445.91 Ha	5404

Project
Land West of Elvington Lane

Drawing Title
Option 4 Areas Plan with H1 and J

Date	Scale	Drawn by	Check by
31.08.16	1:12500 @ A3	KT	MV
Project No	Drawing No	Revision	
23190	9921	F	



Planning • Master Planning & Urban Design
Architecture • Landscape Planning & Design • Project Services
Environmental & Sustainability Assessment • Graphic Design

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Appendix C

CONCEPT MASTERPLAN

Appendix D

LANDMARK ENVIROCHECK

Historical Mapping Legends

Ordnance Survey County Series 1:10,560

	Gravel Pit		Sand Pit		Other Pits
	Quarry		Shingle		Orchard
	Osiers		Reeds		Marsh
	Mixed Wood		Deciduous		Brushwood
	Fir		Furze		Rough Pasture
	Arrow denotes flow of water		Trigonometrical Station		
	Site of Antiquities		Bench Mark		
	Pump, Guide Post, Signal Post		Well, Spring, Boundary Post		
	-285 Surface Level				
	Sketched Contour		Instrumental Contour		
	Main Roads		Minor Roads		
	Sunken Road		Raised Road		
	Road over Railway		Railway over River		
	Railway over Road		Level Crossing		
	Road over River or Canal		Road over Stream		
	Road over Stream				
	County Boundary (Geographical)				
	County & Civil Parish Boundary				
	Administrative County & Civil Parish Boundary				
	County Borough Boundary (England)				
	County Burgh Boundary (Scotland)				
	Rural District Boundary				
	Civil Parish Boundary				

Ordnance Survey Plan 1:10,000

	Chalk Pit, Clay Pit or Quarry		Gravel Pit
	Sand Pit		Disused Pit or Quarry
	Refuse or Slag Heap		Lake, Loch or Pond
	Dunes		Boulders
	Coniferous Trees		Non-Coniferous Trees
	Orchard		Scrub
	Coppice		
	Bracken		Heath
	Rough Grassland		
	Marsh		Reeds
	Saltings		
	Building		Glasshouse
	Sloping Masonry		Pylon
	Electricity Transmission Line		Pole
	Cutting		Embankment
	Standard Gauge Multiple Track		
	Standard Gauge Single Track		
	Siding, Tramway or Mineral Line		
	Narrow Gauge		
	Geographical County		
	Administrative County, County Borough or County of City		
	Municipal Borough, Urban or Rural District, Burgh or District Council		
	Borough, Burgh or County Constituency Shown only when not coincident with other boundaries		
	Civil Parish Shown alternately when coincidence of boundaries occurs		
	BP, BS Boundary Post or Stone		Pol Sta Police Station
	Ch Church		PO Post Office
	CH Club House		PC Public Convenience
	F E Sta Fire Engine Station		PH Public House
	FB Foot Bridge		SB Signal Box
	Fn Fountain		Spr Spring
	GP Guide Post		TCB Telephone Call Box
	MP Mile Post		TCP Telephone Call Post
	MS Mile Stone		W Well

1:10,000 Raster Mapping

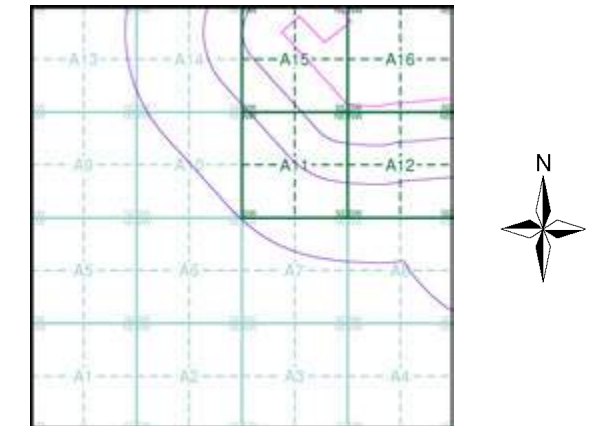
	Gravel Pit		Refuse tip or slag heap
	Rock		Rock (scattered)
	Boulders		Boulders (scattered)
	Shingle		Mud
	Sand		Sand Pit
	Slopes		Top of cliff
	General detail		Underground detail
	Overhead detail		Narrow gauge railway
	Multi-track railway		Single track railway
	County boundary (England only)		Civil, parish or community boundary
	District, Unitary, Metropolitan, London Borough boundary		Constituency boundary
	Area of wooded vegetation		Non-coniferous trees
	Non-coniferous trees (scattered)		Coniferous trees
	Coniferous trees (scattered)		Positioned tree
	Orchard		Coppice or Osiers
	Rough Grassland		Heath
	Scrub		Marsh, Salt Marsh or Reeds
	Water feature		Flow arrows
	MHW(S) Mean high water (springs)		MLW(S) Mean low water (springs)
	Telephone line (where shown)		Electricity transmission line (with poles)
	Bench mark (where shown)		Triangulation station
	Point feature (e.g. Guide Post or Mile Stone)		Pylon, flare stack or lighting tower
	Site of (antiquity)		Glasshouse
	General Building		Important Building



Historical Mapping & Photography included:

Mapping Type	Scale	Date	Pg
Yorkshire	1:10,560	1851 - 1853	3
Yorkshire	1:10,560	1893	4
Yorkshire	1:10,560	1910	5
Yorkshire	1:10,560	1931	6
Yorkshire	1:10,560	1938 - 1952	7
Yorkshire	1:10,560	1938	8
Yorkshire	1:10,560	1953	9
Ordnance Survey Plan	1:10,000	1958	10
Ordnance Survey Plan	1:10,000	1970 - 1972	11
York	1:10,000	1980	12
Ordnance Survey Plan	1:10,000	1981	13
Ordnance Survey Plan	1:10,000	1988	14
10K Raster Mapping	1:10,000	1999	15
10K Raster Mapping	1:10,000	2006	16
VectorMap Local	1:10,000	2016	17

Historical Map - Slice A



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 464800, 448070
 Slice: A
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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Russian Military Mapping Legends

1:5,000 and 1:10,000 mapping

a. Not drawn to scale b. Drawn to scale

- Government and Administrative Buildings
- Military and Industrial Buildings
- Military and Communication Areas
- Subway Entrance
- Fireproof Building
- Prominent Fireproof Building
- Non-fireproof Building
- Non-fireproof Building (non-dwelling)
- Factory, mill, and flour mill, with chimneys
- Factory, mill, and flour mill, without chimneys
- Power Station, drawn to scale
- Hydroelectric Power Station
- Radio Station, drawn to scale
- Telephone Station, drawn to scale
- Abandoned Open-pit Mine or Quarry
- Open-pit Salt Mine
- Pit
- Oil Deposit or Well
- Oil Seepage
- Tailings Pile
- Fuel Storage Tanks
- Natural Gas Tank
- Bench Mark
- Drill Hole
- Burial Mound
- Triangulation Point on Burial Mound
- Single-track Railroad
- Small Bridge
- Double-track Railroad and Station Building
- Coniferous Forest
- Deciduous Forest
- Mixed Forest
- Lawns
- Citrus Orchard
- Wet Ground
- Scattered Vegetation

243,8 Values for prominent elevations
 186,0 Numbers for spot elevations, depth soundings, contour lines, etc.
 0,2 Velocity of the current, width of river bed, depth of river
 Fractional terms: length and capacity of bridges; depth of fords and condition of the river bottom; height of forest and the diameter of trees

Russian Alphabet (For reference and phonetic interpretation of map text)

А а (A)	З з (Z)	П п (P)	Ч ч (CH)
Б б (B)	И и (I)	Р р (R)	Ш ш (SH)
В в (V)	Й й (Y)	С с (S)	Щ щ (SHCH)
Г г (G)	К к (K)	Т т (T)	Ъ (-)
Д д (D)	Л л (L)	У у (U)	Ы (Y)
Е е (E)	М м (M)	Ф ф (F)	Ь (')
Ё ё (YO)	Н н (N)	Х х (KH)	Э э (E)
Ж ж (ZH)	О о (O)	Ц ц (TS)	Ю ю (YU or IU)
			Я я (YA or IA)

1:25,000 mapping

a. Not drawn to scale b. Drawn to scale

- Government and Administrative Buildings
- Military and Industrial Buildings
- Military and Communication Areas
- Subway Entrance
- Partly Demolished Buildings
- Demolished Buildings
- Built-Up Area with Fireproof Buildings Predominant
- Built-Up Area with Non-Fireproof Buildings Predominant
- Individual Fireproof Building
- Prominent Industrial Building
- Individual Dwelling, Fireproof
- Ruins of an Individual Dwelling
- Factory or Mill Chimney
- Factory or Mill with Chimney
- Factory or Mill without Chimney
- Mine or Open Pit Mine
- Operating Shaft or Mine
- Non-Operating Shaft or Mine
- Salt Mine
- Tailings Pile
- Pit
- Stone Quarry
- Gas Pump or Service Station
- Fuel Storage or Natural Gas Tank
- Oil or Natural Gas Derrick
- Small Hydroelectric Power Station
- Power Station
- Transformer Station
- Cemetery
- Burial Mound (height in metres)
- Triangulation Point on Burial Mound
- Triangulation Point
- Bench Mark
- Bench Mark (monumented)
- Telegraph Office
- Telephone Station
- Radio Station
- Radio Tower
- Airfield or Seaplane Base
- Landing Strip
- Small Bridge
- Pipe (Culvert)
- Tunnel
- Dismantled Railroad
- Double-track Railroad with First Class Station
- Railroad Under Construction
- Shore Embankment
- River or Ditch with Embankment
- Water Reservoir or Rain Water Pit
- Spring
- Isobath with value
- Well
- Water Reservoir or Rain Water Pit
- Spring
- Isobath with value
- Heavy (Index) Contour Line
- Contour Line and Value
- Half Contour Line
- Spot Elevation Value
- Coniferous
- Deciduous
- Mixed
- Scrub

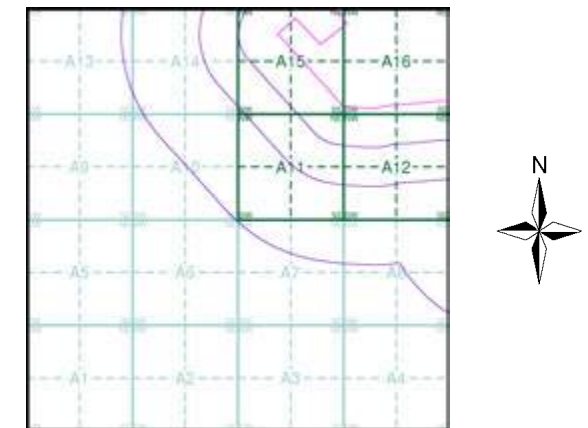
Key to Numbers on Mapping



Historical Mapping & Photography included:

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Yorkshire	1:10,560	1893	4
Yorkshire	1:10,560	1910	5
Yorkshire	1:10,560	1931	6
Yorkshire	1:10,560	1938 - 1952	7
Yorkshire	1:10,560	1938	8
Yorkshire	1:10,560	1953	9
Ordnance Survey Plan	1:10,000	1958	10
Ordnance Survey Plan	1:10,000	1970 - 1972	11
York	1:10,000	1980	12
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Ordnance Survey Plan	1:10,000	1988	14
10K Raster Mapping	1:10,000	1999	15
10K Raster Mapping	1:10,000	2006	16
VectorMap Local	1:10,000	2016	17

Russian Map - Slice A



Order Details

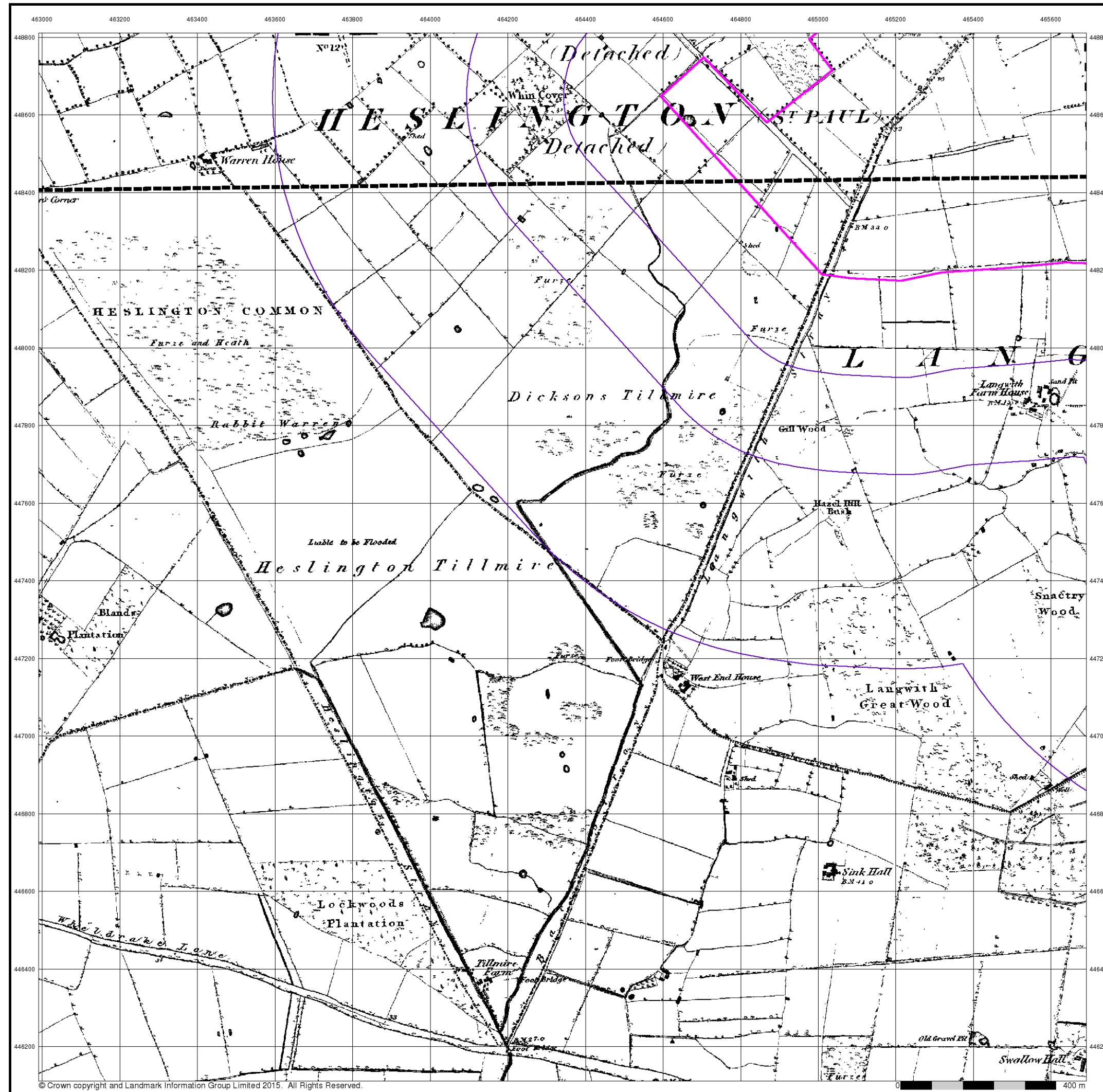
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 Customer Ref: 70011808-701
 National Grid Reference: 464800, 448070
 Slice: A
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

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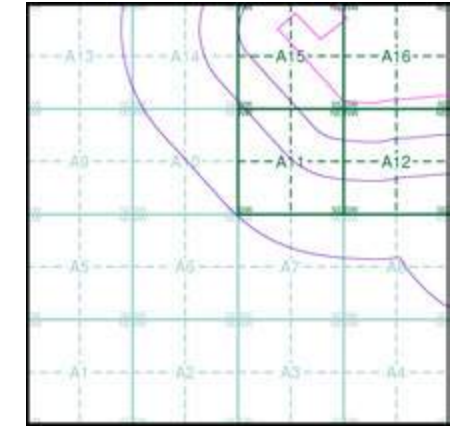
Yorkshire
Published 1851 - 1853
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

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19100	1851	1:10,560

Historical Map - Slice A



Order Details

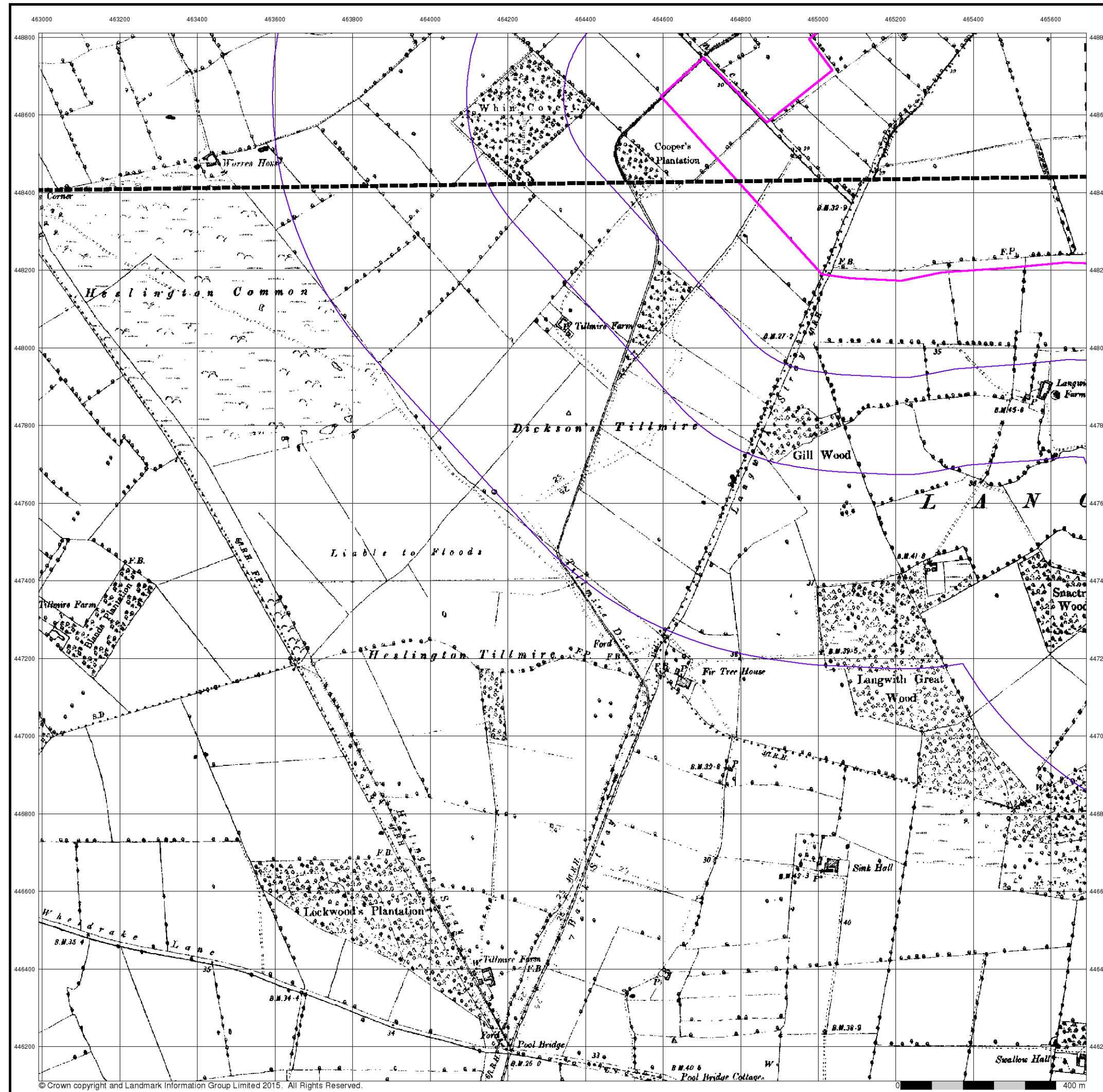
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Yorkshire

Published 1893

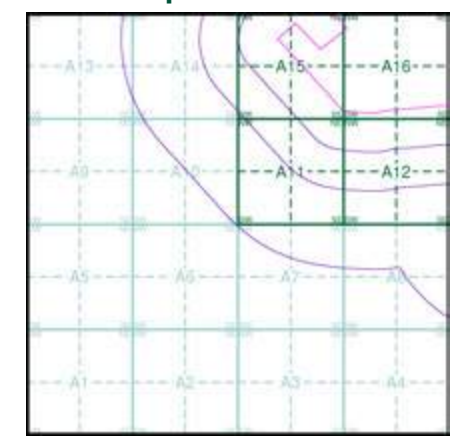
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

174SE	1893	1:10,560
191NE	1893	1:10,560

Historical Map - Slice A



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
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Yorkshire

Published 1910

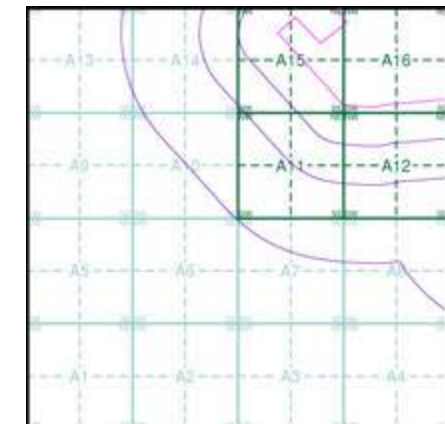
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

174SE	1910	1:10,560
191NE	1910	1:10,560

Historical Map - Slice A



Order Details

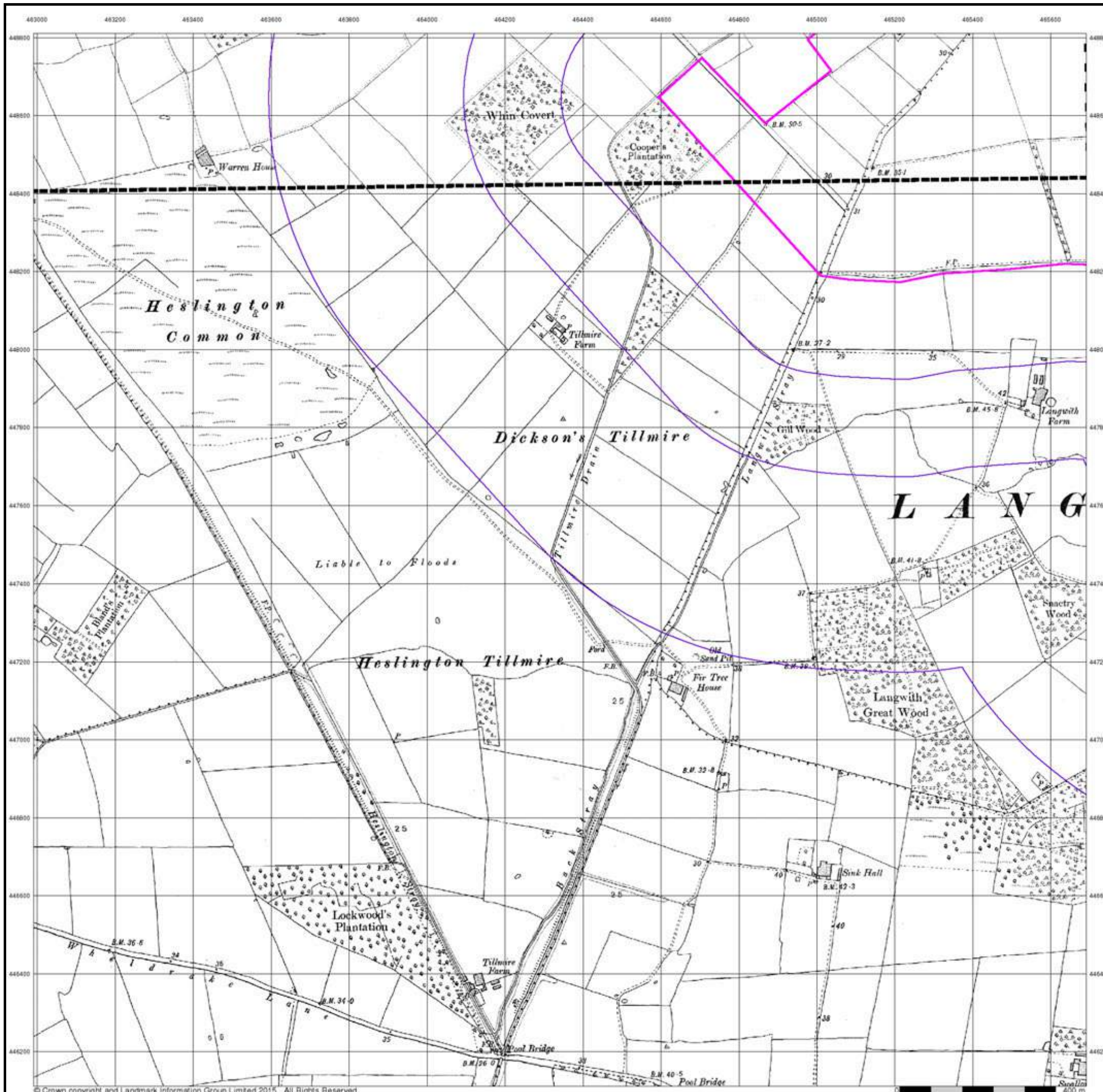
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 464800, 448070
 Slice: A
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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Yorkshire

Published 1938 - 1952

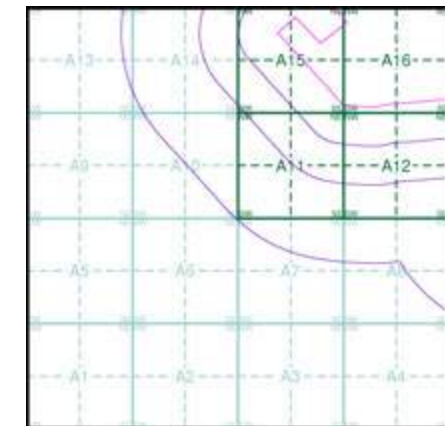
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

174SE	1938	1:10,560
191NE	1952	1:10,560

Historical Map - Slice A



Order Details

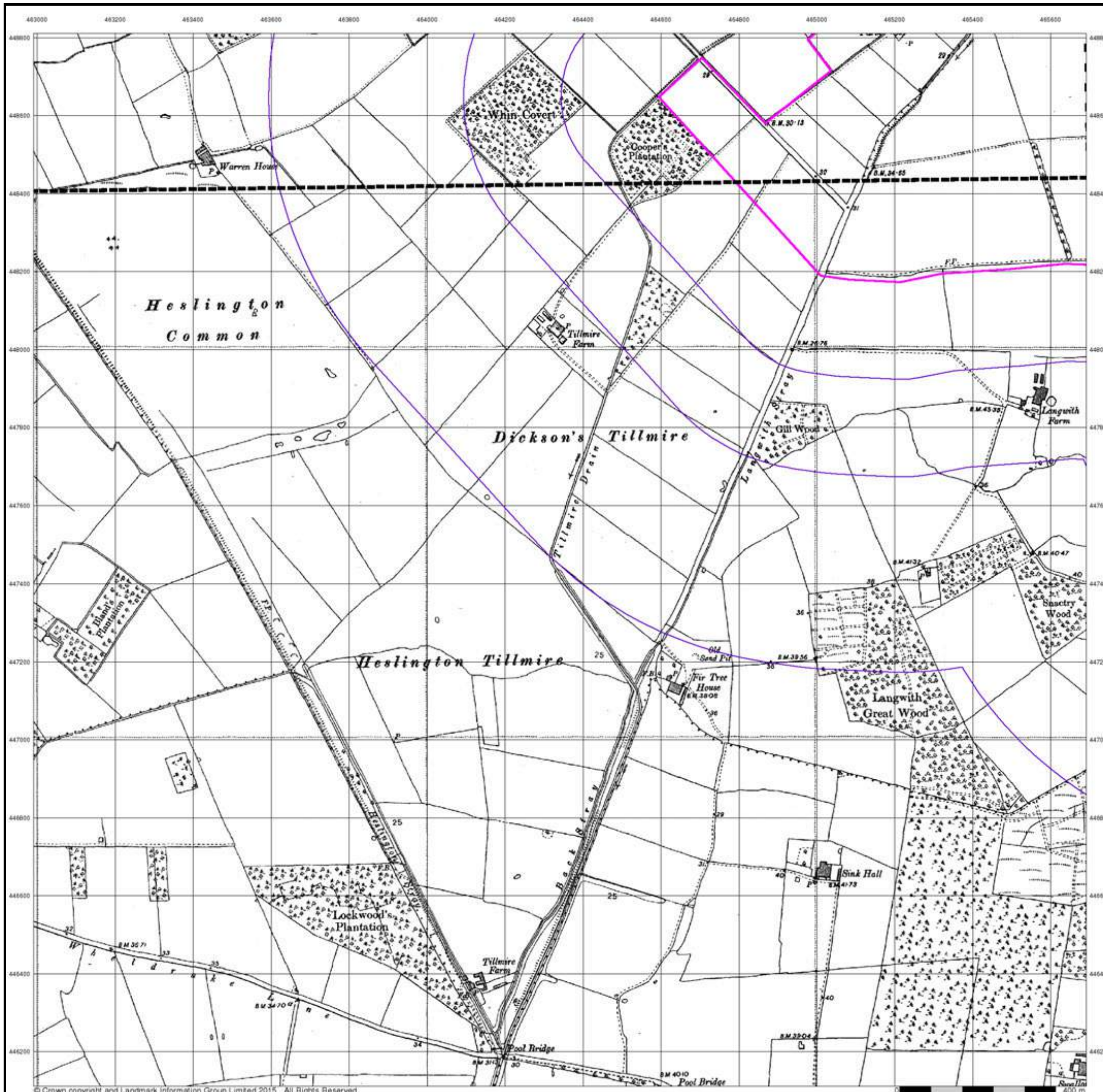
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 Slice: A
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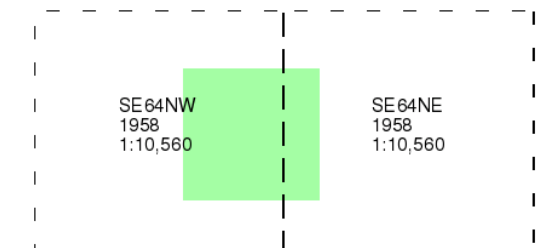
Ordnance Survey Plan

Published 1958

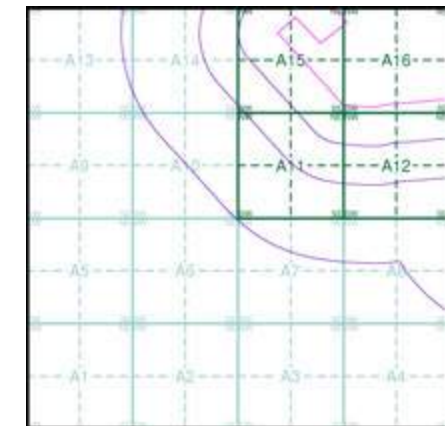
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice A



Order Details

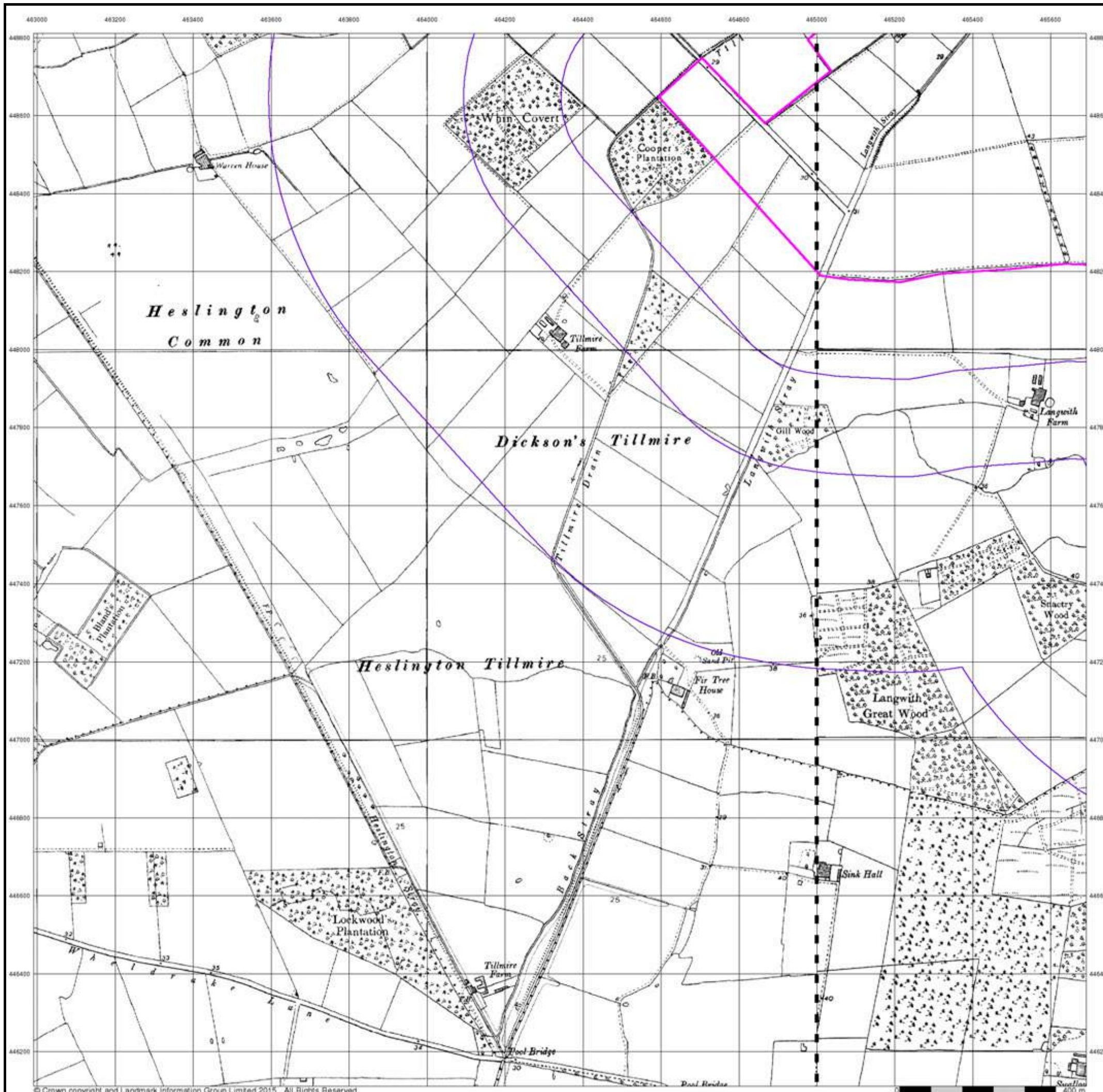
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National Grid Reference: 464800, 448070
Slice: A
Site Area (Ha): 246.75
Search Buffer (m): 1000

Site Details

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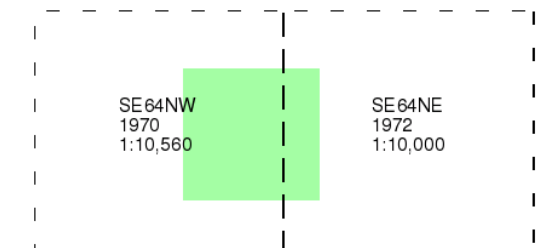
Ordnance Survey Plan

Published 1970 - 1972

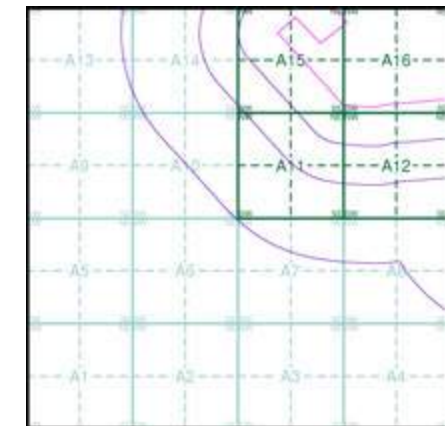
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice A



Order Details

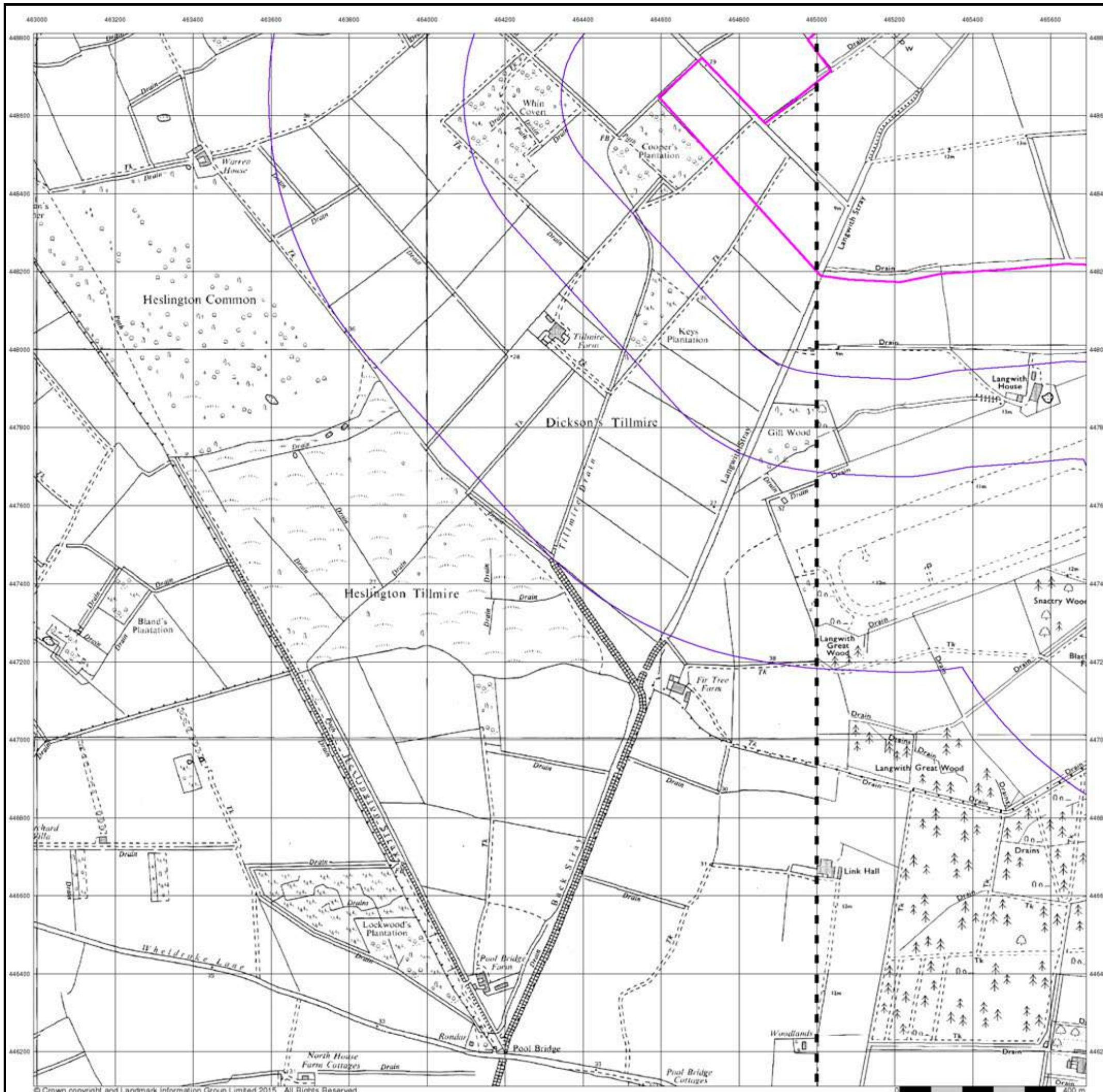
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Customer Ref: 70011808-701
National Grid Reference: 464800, 448070
Slice: A
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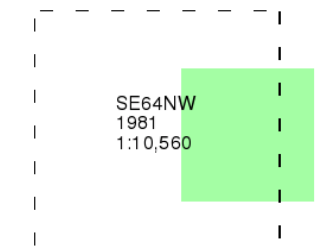
Ordnance Survey Plan

Published 1981

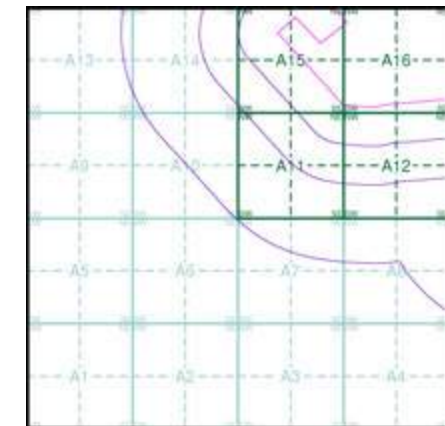
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice A



Order Details

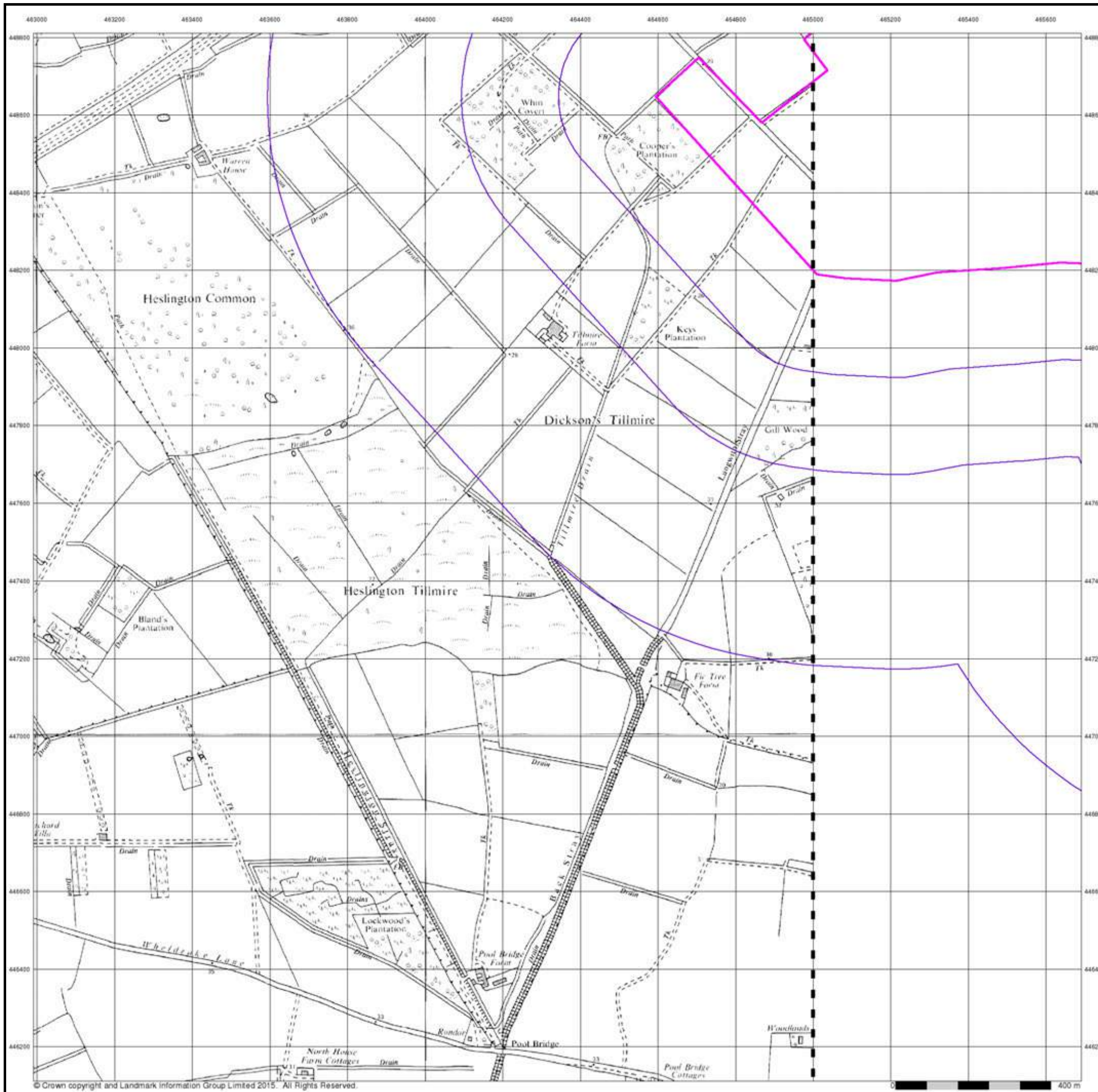
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Customer Ref: 70011808-701
National Grid Reference: 464800, 448070
Slice: A
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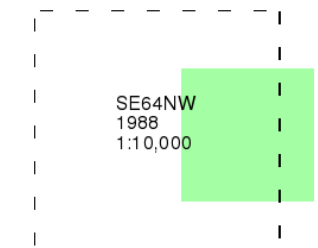
Ordnance Survey Plan

Published 1988

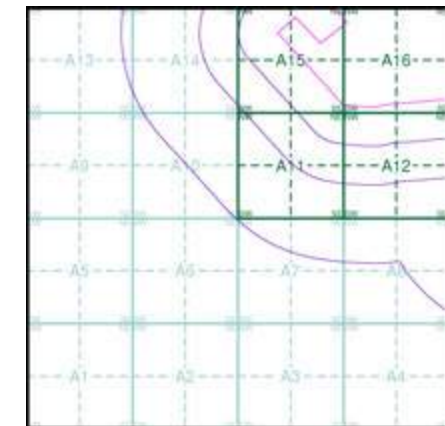
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice A



Order Details

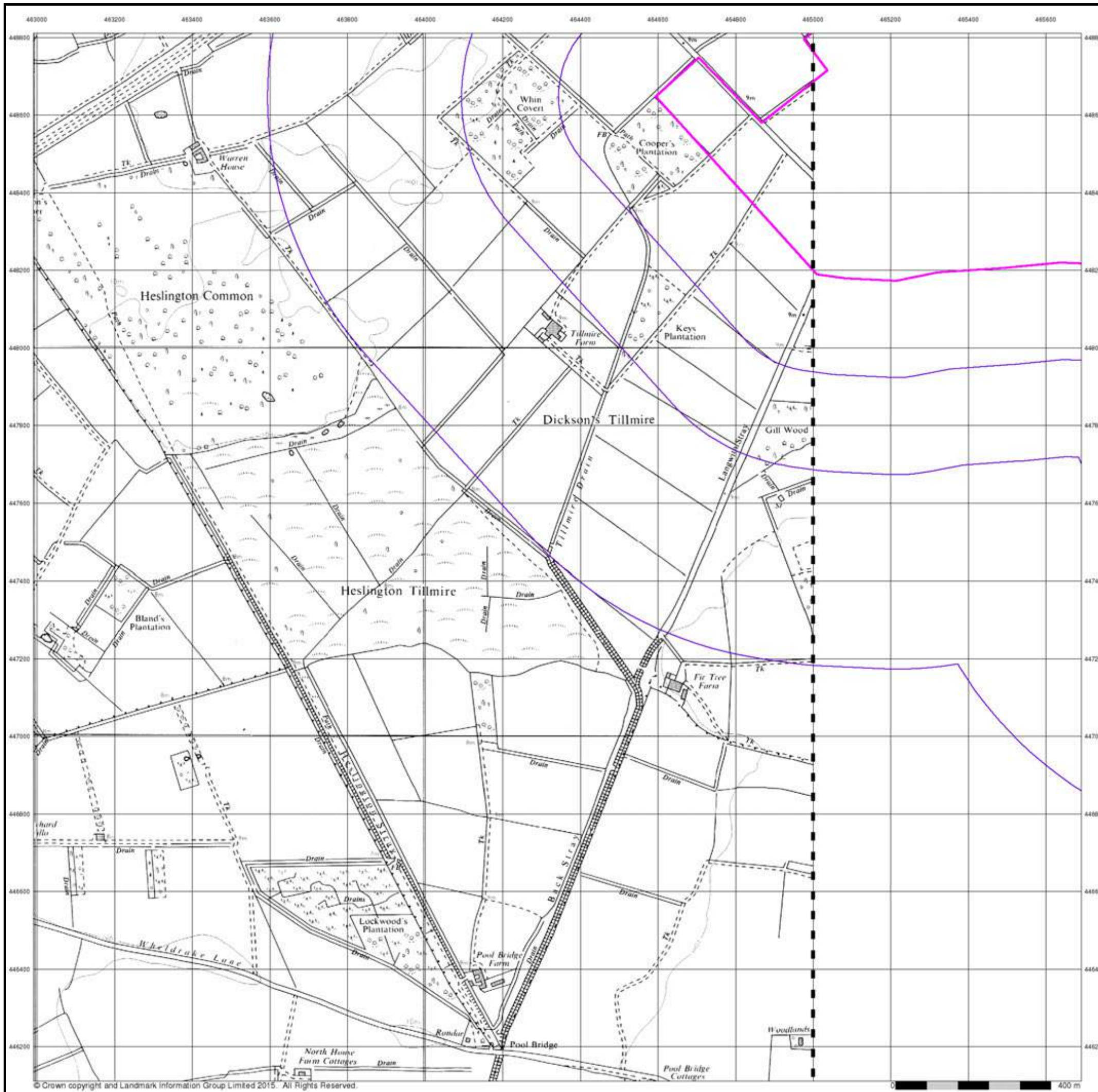
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National Grid Reference: 464800, 448070
Slice: A
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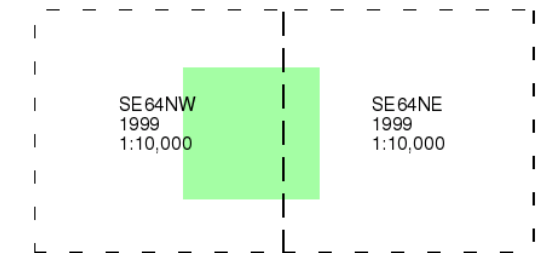
10k Raster Mapping

Published 1999

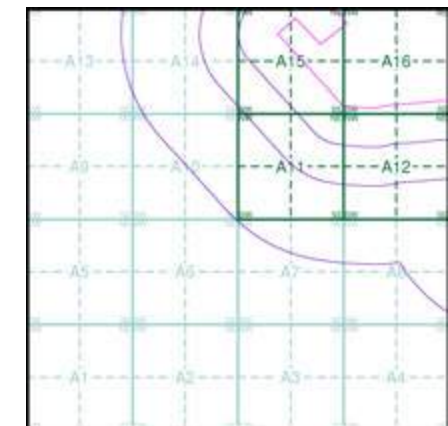
Source map scale - 1:10,000

The historical maps shown were produced from the Ordnance Survey's 1:10,000 colour raster mapping. These maps are derived from Landplan which replaced the old 1:10,000 maps originally published in 1970. The data is highly detailed showing buildings, fences and field boundaries as well as all roads, tracks and paths. Road names are also included together with the relevant road number and classification. Boundary information depiction includes county, unitary authority, district, civil parish and constituency.

Map Name(s) and Date(s)



Historical Map - Slice A



Order Details

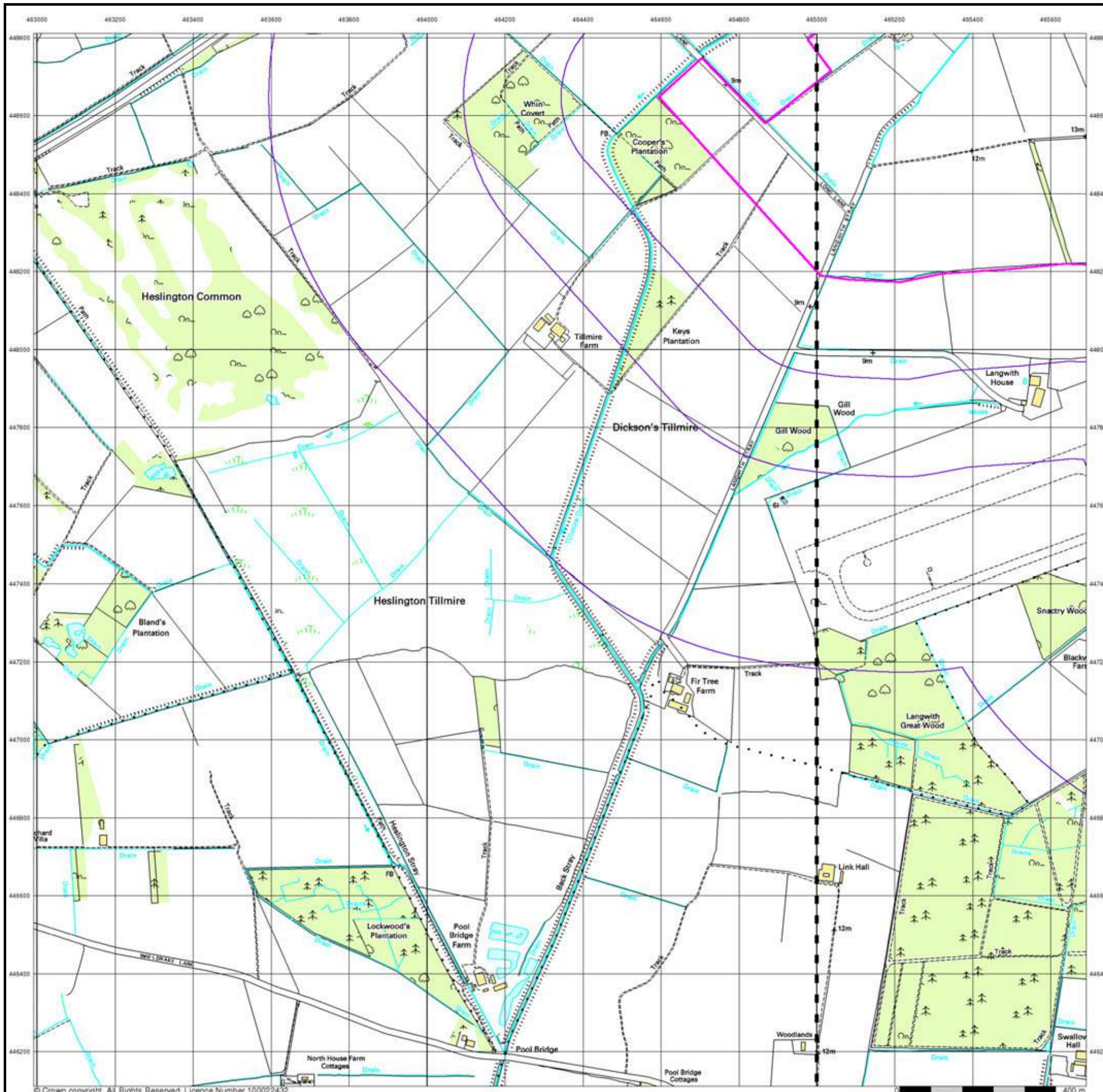
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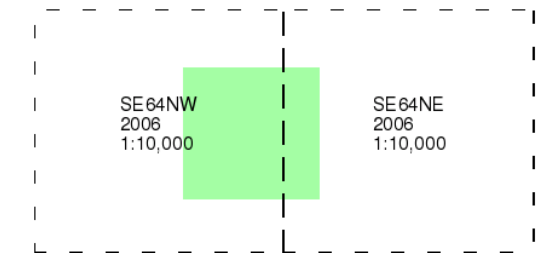
10k Raster Mapping

Published 2006

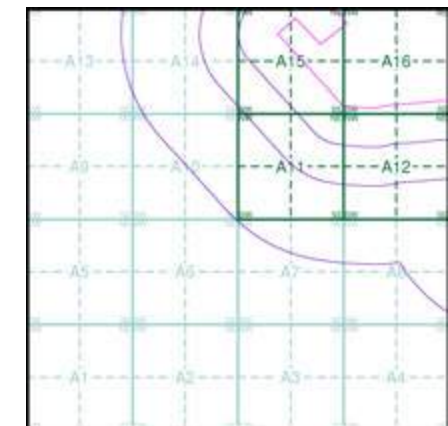
Source map scale - 1:10,000

The historical maps shown were produced from the Ordnance Survey's 1:10,000 colour raster mapping. These maps are derived from Landplan which replaced the old 1:10,000 maps originally published in 1970. The data is highly detailed showing buildings, fences and field boundaries as well as all roads, tracks and paths. Road names are also included together with the relevant road number and classification. Boundary information depiction includes county, unitary authority, district, civil parish and constituency.

Map Name(s) and Date(s)



Historical Map - Slice A



Order Details

Order Number: 95641417_1_1
Customer Ref: 70011808-701
National Grid Reference: 464800, 448070
Slice: A
Site Area (Ha): 246.75
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Site Details

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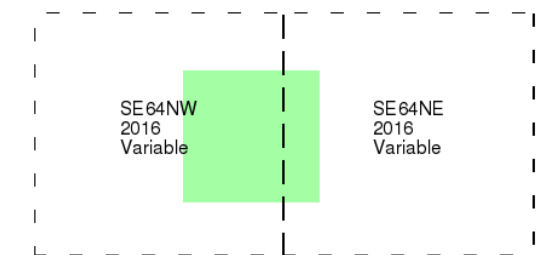
VectorMap Local

Published 2016

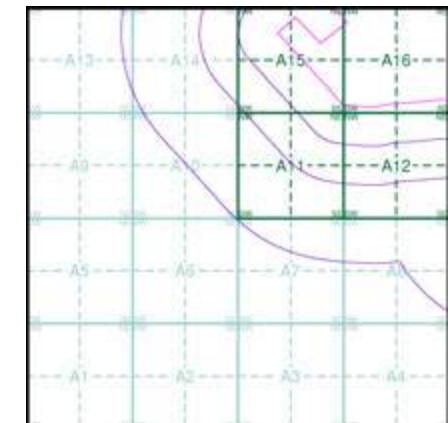
Source map scale - 1:10,000

VectorMap Local (Raster) is Ordnance Survey's highest detailed 'backdrop' mapping product. These maps are produced from OS's VectorMap Local, a simple vector dataset at a nominal scale of 1:10,000, covering the whole of Great Britain, that has been designed for creating graphical mapping. OS VectorMap Local is derived from large-scale information surveyed at 1:1250 scale (covering major towns and cities), 1:2500 scale (smaller towns, villages and developed rural areas), and 1:10 000 scale (mountain, moorland and river estuary areas).

Map Name(s) and Date(s)



Historical Map - Slice A



Order Details

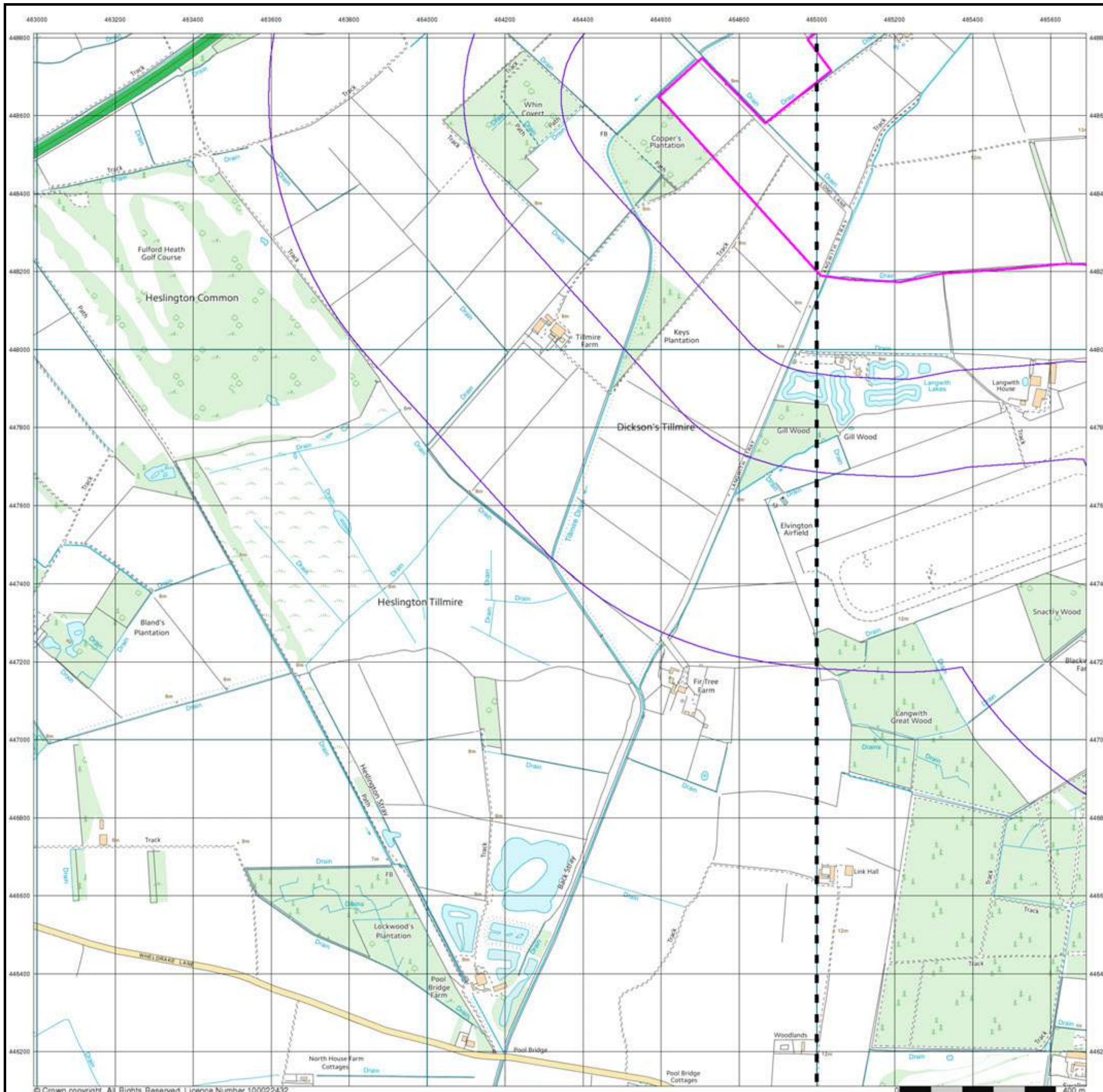
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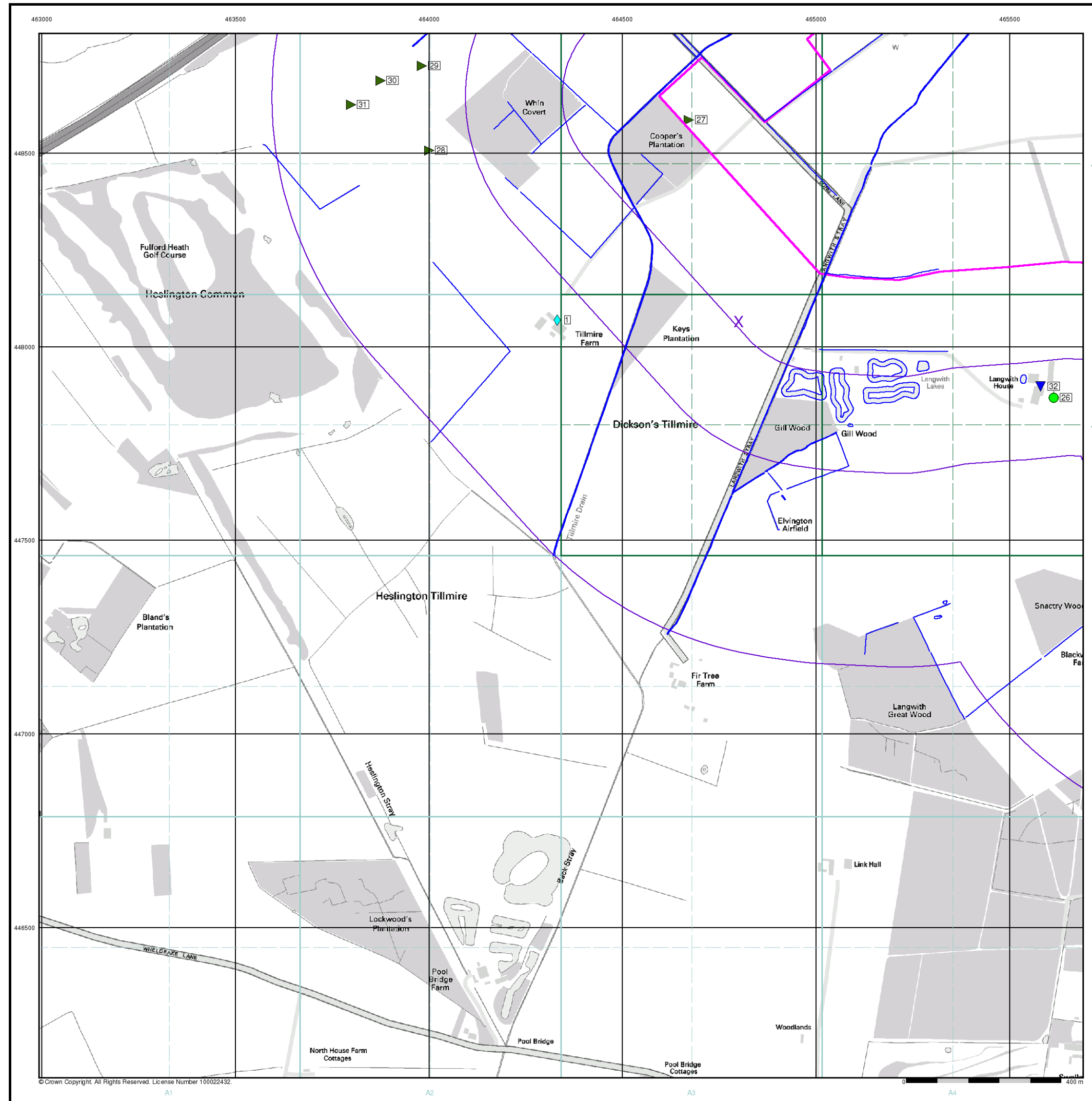
Site Details

Site off Elvington Lane, York, YO41 4AU



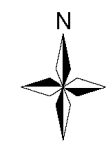
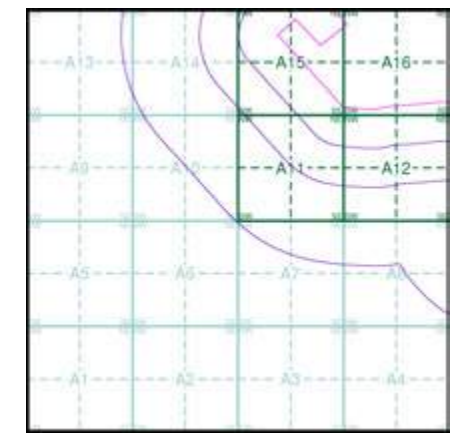
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Web: www.envirocheck.co.uk





- General**
- Specified Site
 - Specified Buffer(s)
 - Bearing Reference Point
 - Map ID
- Agency and Hydrological**
- Contaminated Land Register Entry or Notice (Location)
 - Contaminated Land Register Entry or Notice
 - Discharge Consent
 - Enforcement or Prohibition Notice
 - Integrated Pollution Control
 - Integrated Pollution Prevention Control
 - Local Authority Integrated Pollution Prevention and Control
 - Local Authority Pollution Prevention and Control
 - Local Authority Pollution Prevention and Control Enforcement
 - Pollution Incident to Controlled Waters
 - Prosecution Relating to Authorised Processes
 - Prosecution Relating to Controlled Waters
 - Registered Radioactive Substance
 - River Network or Water Feature
 - River Quality Sampling Point
 - Substantiated Pollution Incident Register
 - Water Abstraction
 - Water Industry Act Referral
- Hazardous Substances**
- COMAH Site
 - Explosive Site
 - NIHHS Site
 - Planning Hazardous Substance Consent
 - Planning Hazardous Substance Enforcement
 - BGS Recorded Mineral Site
- Waste**
- BGS Recorded Landfill Site (Location)
 - BGS Recorded Landfill Site
 - EA Historic Landfill (Buffered Point)
 - EA Historic Landfill (Polygon)
 - Integrated Pollution Control Registered Waste Site
 - Licensed Waste Management Facility (Landfill Boundary)
 - Licensed Waste Management Facility (Location)
 - Local Authority Recorded Landfill Site (Location)
 - Local Authority Recorded Landfill Site
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Water)
 - Potentially Infilled Land (Water)
 - Potentially Infilled Land (Water)
 - Registered Landfill Site
 - Registered Landfill Site (Point Buffered to 100m)
 - Registered Landfill Site (Point Buffered to 250m)
 - Registered Waste Transfer Site (Location)
 - Registered Waste Transfer Site
 - Registered Waste Treatment or Disposal Site (Location)
 - Registered Waste Treatment or Disposal Site

Site Sensitivity Map - Slice A



Order Details

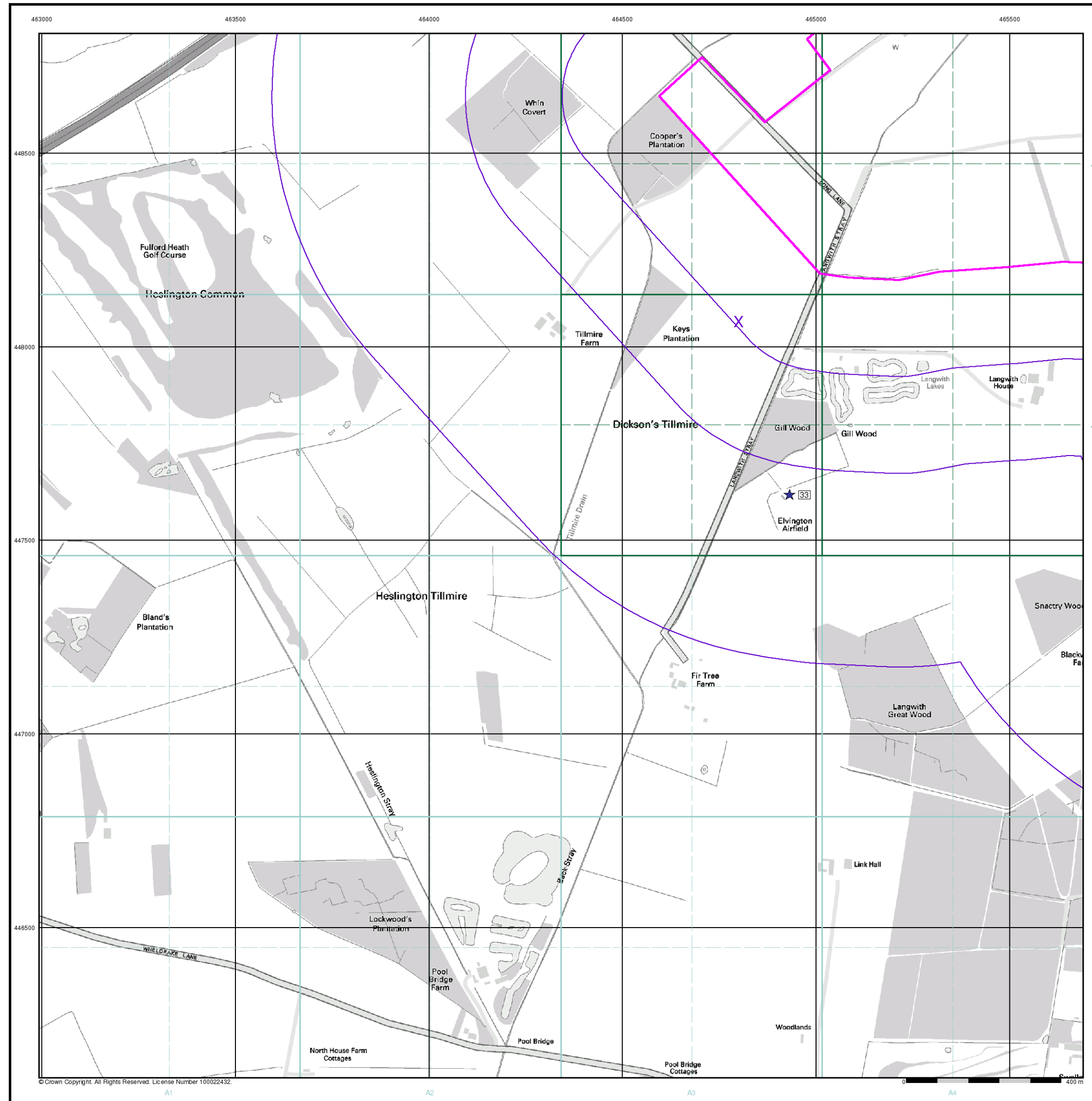
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 Customer Ref: 70011808-701
 National Grid Reference: 464800, 448070
 Slice: A
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU

Landmark Information Group

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Industrial Land Use Map

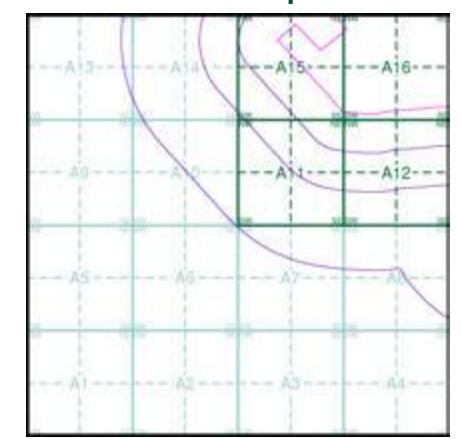
General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point
- Slice
- Map ID

Industrial Land Use

- Contemporary Trade Directory Entry
- Fuel Station Entry
- Gas Pipeline
- Points of Interest - Commercial Services
- Points of Interest - Education and Health
- Points of Interest - Manufacturing and Production
- Points of Interest - Public Infrastructure
- Points of Interest - Recreational and Environmental
- Underground Electrical Cables

Industrial Land Use Map - Slice A



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 464800, 448070
 Slice: A
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

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


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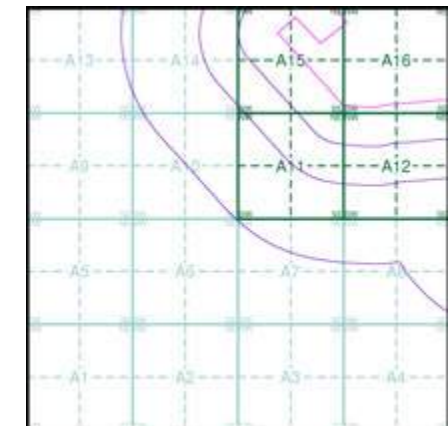
General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point

Agency and Hydrological (Flood)

-  Extreme Flooding from Rivers or Sea without Defences (Zone 2)
-  Flooding from Rivers or Sea without Defences (Zone 3)
-  Area Benefiting from Flood Defence
-  Flood Water Storage Areas
-  Flood Defence

Flood Map - Slice A

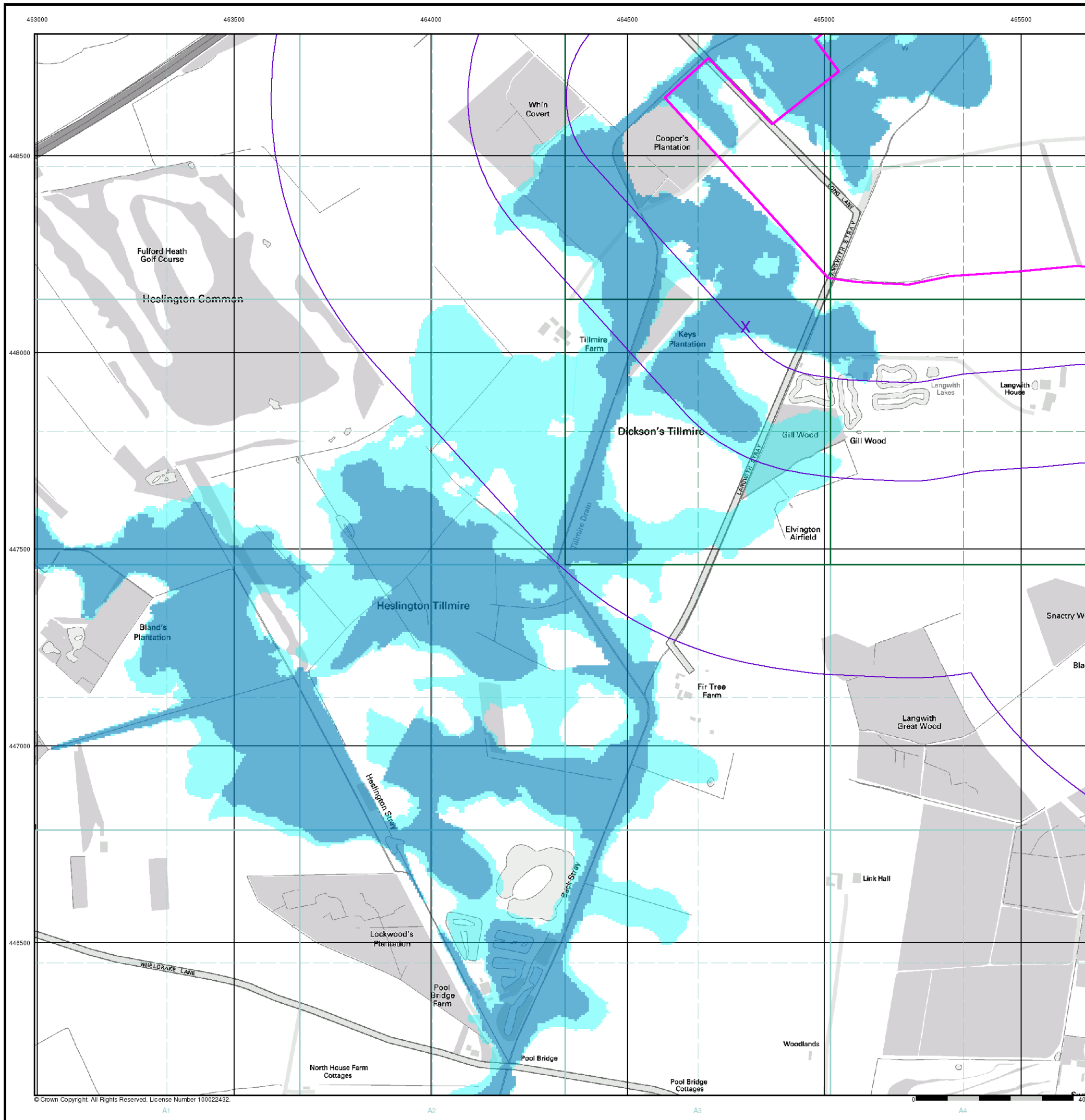


Order Details






Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 464800, 448070
 Slice: A
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details






Site off Elvington Lane, York, YO41 4AU



General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point
-  Map ID
-  Several of Type at Location

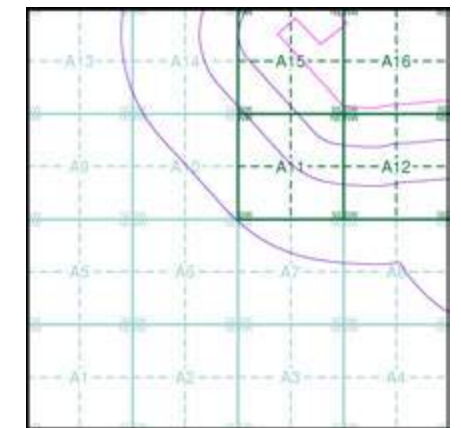
Agency and Hydrological (Boreholes)

-  BGS Borehole Depth 0 - 10m
-  BGS Borehole Depth 10 - 30m
-  BGS Borehole Depth 30m +
-  Confidential
-  Other

For Borehole information please refer to the Borehole .csv file which accompanied this slice.

A copy of the BGS Borehole Ordering Form is available to download from the Support section of www.envirocheck.co.uk.

Borehole Map - Slice A

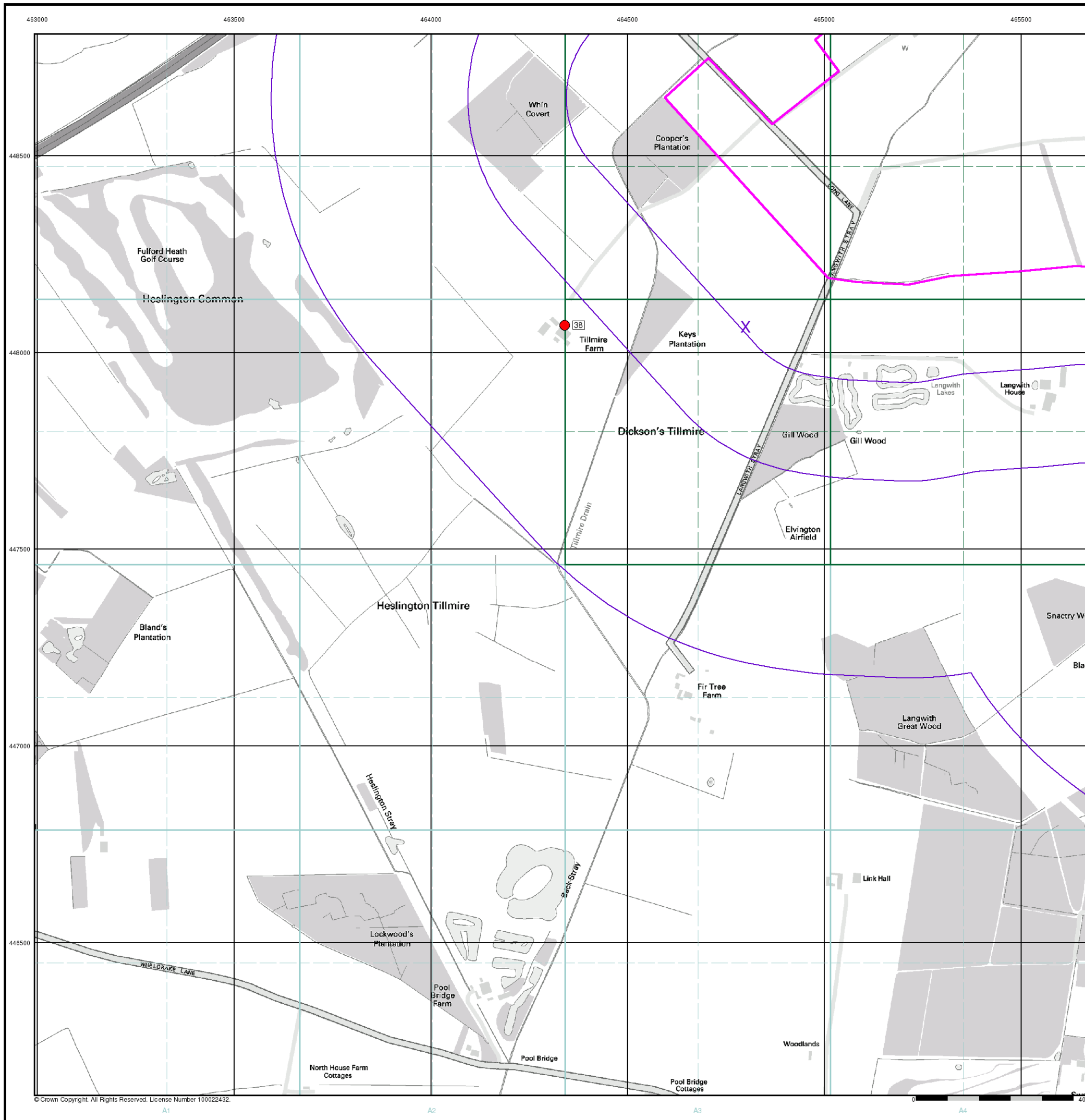


Order Details

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 Customer Ref: 70011808-701
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Site Details

Site off Elvington Lane, York, YO41 4AU





General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point
- Map ID

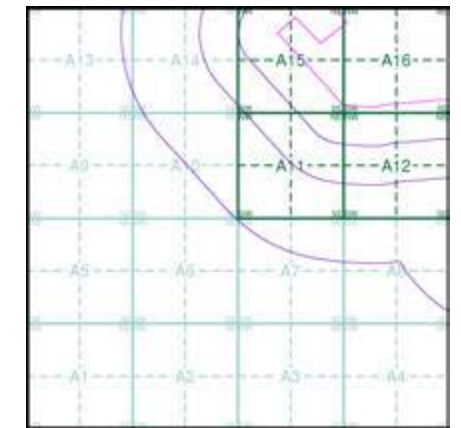
Detailed River Network Data

- | | |
|--------------------------|-------------------------------------|
| Primary River | Extended Culvert (greater than 50m) |
| Secondary River | Underground River (inferred) |
| Tertiary River | Underground River (local knowledge) |
| Canal | Downstream of High Water Mark |
| Canal Tunnel | Downstream of Seaward Extension |
| Undefined River | Not assigned River feature |
| Lake/Reservoir | |
| Offline Drainage Feature | |

Contours (height in metres)

- Standard Contour 105
- Master Contour 100
- Spot Height 167.3
- MLW - Mean Low Water
- MHW - Mean High Water

EAN/RW Detailed River Network Map - Slice A



Order Details

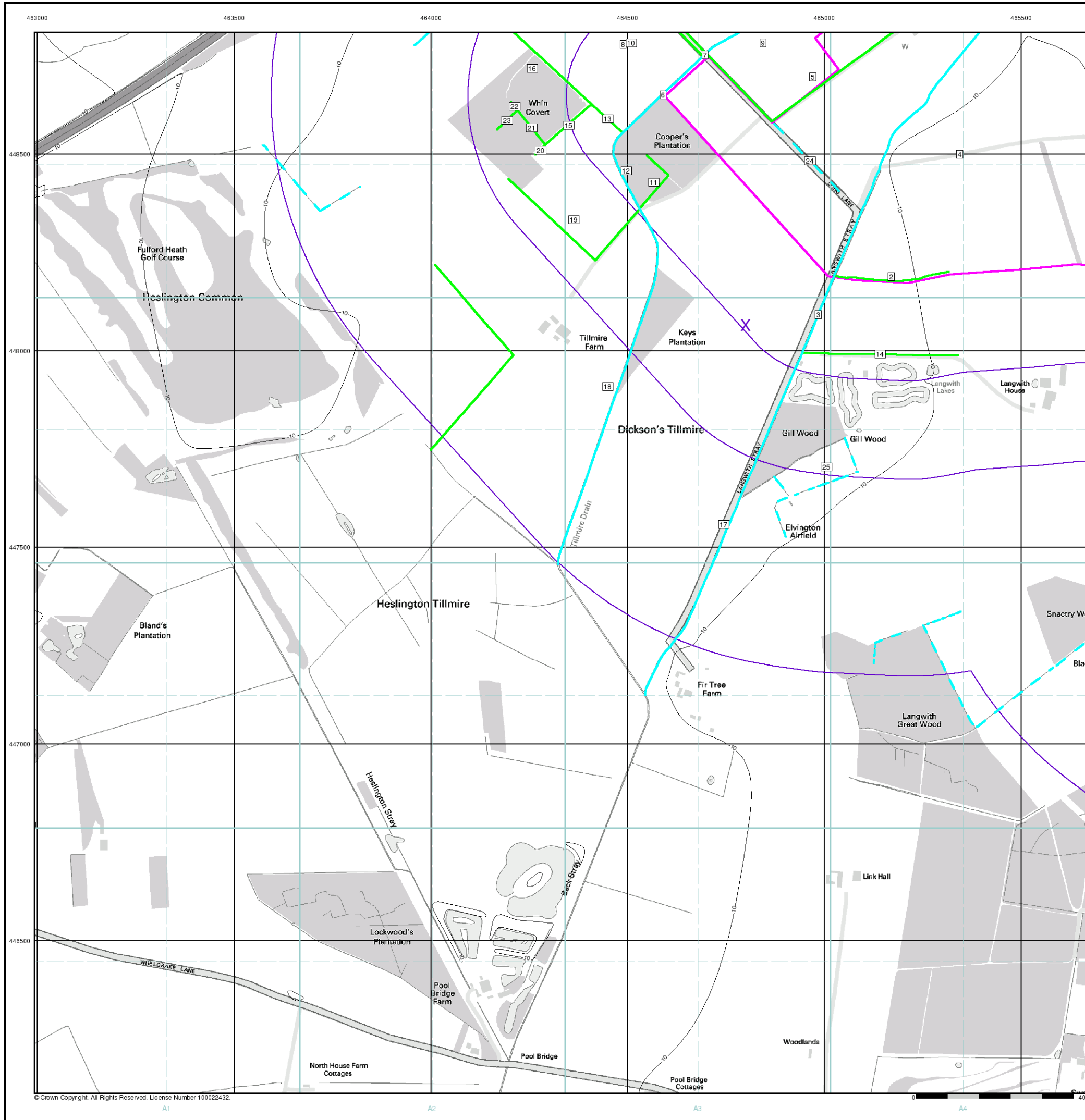
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 464800, 448070
 Slice: A
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

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General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point

Risk of Flooding from Surface Water

-  High - 30 Year Return
-  Medium - 100 Year Return
-  Low - 1000 Year Return

Suitability

- See the suitability map below
-  National to county
 -  County to town
 -  Town to street
 -  Street to parcels of land
 -  Property

EANRW Suitability Map - Slice A

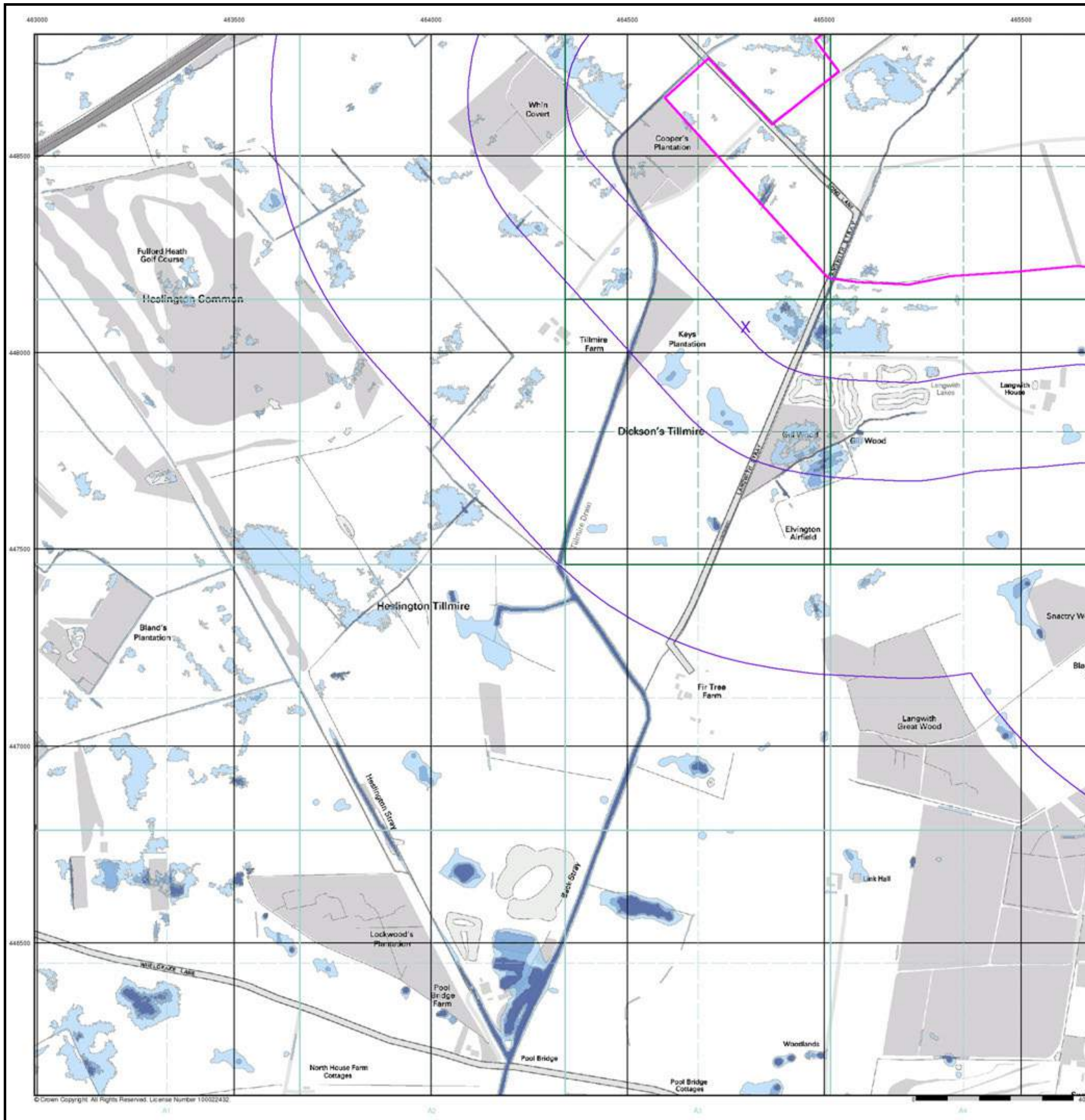


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 Customer Ref: 70011808-701
 National Grid Reference: 464800, 448070
 Slice: A
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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Historical Mapping Legends

Ordnance Survey County Series 1:10,560

- Gravel Pit
- Sand Pit
- Other Pits
- Quarry
- Shingle
- Orchard
- Osiers
- Reeds
- Marsh
- Mixed Wood
- Deciduous
- Brushwood
- Fir
- Furze
- Rough Pasture
- Arrow denotes flow of water
- Trigonometrical Station
- Site of Antiquities
- Bench Mark
- Pump, Guide Post, Signal Post
- Well, Spring, Boundary Post
- 285** Surface Level
- Sketched Contour
- Instrumental Contour
- Main Roads
- Minor Roads
- Sunken Road
- Raised Road
- Road over Railway
- Railway over River
- Railway over Road
- Level Crossing
- Road over River or Canal
- Road over Stream
- Road over Stream
- County Boundary (Geographical)
- County & Civil Parish Boundary
- Administrative County & Civil Parish Boundary
- Co. Boro. Bdy. County Borough Boundary (England)
- Co. Burgh Bdy. County Burgh Boundary (Scotland)
- R.D. Bdy. Rural District Boundary
- Civil Parish Boundary

Ordnance Survey Plan 1:10,000

- Chalk Pit, Clay Pit or Quarry
- Gravel Pit
- Sand Pit
- Disused Pit or Quarry
- Refuse or Slag Heap
- Lake, Loch or Pond
- Dunes
- Boulders
- Coniferous Trees
- Non-Coniferous Trees
- Orchard
- Scrub
- Coppice
- Bracken
- Heath
- Rough Grassland
- Marsh
- Reeds
- Saltings
- Building
- Glasshouse
- Sloping Masonry
- Pylon
- Electricity Transmission Line
- Pole
- Cutting
- Embankment
- Standard Gauge Multiple Track
- Standard Gauge Single Track
- Siding, Tramway or Mineral Line
- Narrow Gauge
- Geographical County
- Administrative County, County Borough or County of City
- Municipal Borough, Urban or Rural District, Burgh or District Council
- Borough, Burgh or County Constituency
- Civil Parish
- BP, BS
- Ch
- CH
- F E Sta
- FB
- Fn
- GP
- MP
- MS
- Pol Sta
- PO
- PC
- PH
- SB
- Spr
- TCB
- TCP
- W

1:10,000 Raster Mapping

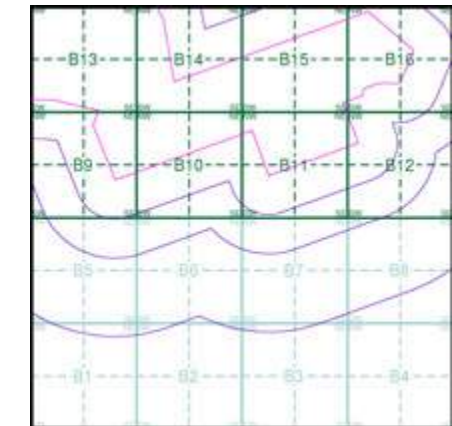
- Gravel Pit
- Rock
- Boulders
- Shingle
- Sand
- Slopes
- General detail
- Overhead detail
- Multi-track railway
- County boundary (England only)
- District, Unitary, Metropolitan, London Borough boundary
- Area of wooded vegetation
- Non-coniferous trees (scattered)
- Coniferous trees (scattered)
- Orchard
- Rough Grassland
- Scrub
- Water feature
- MHW(S) Mean high water (springs)
- BM 123.45 m
- Site of (antiquity)
- General Building
- Refuse tip or slag heap
- Rock (scattered)
- Boulders (scattered)
- Mud
- Sand Pit
- Top of cliff
- Underground detail
- Narrow gauge railway
- Single track railway
- Civil, parish or community boundary
- Constituency boundary
- Non-coniferous trees
- Coniferous trees
- Positioned tree
- Coppice or Osiers
- Heath
- Marsh, Salt Marsh or Reeds
- Flow arrows
- MLW(S) Mean low water (springs)
- Electricity transmission line (with poles)
- Triangulation station
- Pylon, flare stack or lighting tower
- Glasshouse
- Important Building



Historical Mapping & Photography included:

Mapping Type	Scale	Date	Pg
Yorkshire	1:10,560	1851 - 1854	3
Yorkshire	1:10,560	1893	4
Yorkshire	1:10,560	1910 - 1911	5
Yorkshire	1:10,560	1931	6
Yorkshire	1:10,560	1938 - 1953	7
Yorkshire	1:10,560	1938	8
Yorkshire	1:10,560	1953	9
Ordnance Survey Plan	1:10,000	1958	10
Ordnance Survey Plan	1:10,000	1972	11
York	1:10,000	1980	12
10K Raster Mapping	1:10,000	1999	13
10K Raster Mapping	1:10,000	2006	14
VectorMap Local	1:10,000	2016	15

Historical Map - Slice B



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 467010, 447810
 Slice: B
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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 Fax: 0844 844 9951
 Web: www.envirocheck.co.uk

Russian Military Mapping Legends

1:5,000 and 1:10,000 mapping

a. Not drawn to scale b. Drawn to scale

- Government and Administrative Buildings
- Military and Industrial Buildings
- Military and Communication Areas
- Subway Entrance
- Fireproof Building
- Prominent Fireproof Building
- Non-fireproof Building
- Non-fireproof Building (non-dwelling)
- Factory, mill, and flour mill, with chimneys
- Factory, mill, and flour mill, without chimneys
- Power Station, drawn to scale
- Hydroelectric Power Station
- Radio Station, drawn to scale
- Telephone Station, drawn to scale
- Abandoned Open-pit Mine or Quarry
- Open-pit Salt Mine
- Pit
- Oil Deposit or Well
- Oil Seepage
- Tailings Pile
- Fuel Storage Tanks
- Natural Gas Tank
- Bench Mark
- Drill Hole
- Burial Mound
- Triangulation Point on Burial Mound
- Single-track Railroad
- Small Bridge
- Double-track Railroad and Station Building
- Coniferous Forest
- Deciduous Forest
- Mixed Forest
- Lawns
- Citrus Orchard
- Wet Ground
- Scattered Vegetation

243,8 Values for prominent elevations
 186,0 Numbers for spot elevations, depth soundings, contour lines, etc.
 0,2 Velocity of the current, width of river bed, depth of river
 Fractional terms: length and capacity of bridges; depth of fords and condition of the river bottom; height of forest and the diameter of trees

Russian Alphabet (For reference and phonetic interpretation of map text)

А а (A)	З з (Z)	П п (P)	Ч ч (CH)
Б б (B)	И и (I)	Р р (R)	Ш ш (SH)
В в (V)	Й й (Y)	С с (S)	Щ щ (SHCH)
Г г (G)	К к (K)	Т т (T)	Ъ (-)
Д д (D)	Л л (L)	У у (U)	Ы (Y)
Е е (E)	М м (M)	Ф ф (F)	Ь (')
Ё ё (YO)	Н н (N)	Х х (KH)	Э э (E)
Ж ж (ZH)	О о (O)	Ц ц (TS)	Ю ю (YU or IU)
			Я я (YA or IA)

1:25,000 mapping

a. Not drawn to scale b. Drawn to scale

- Government and Administrative Buildings
- Military and Industrial Buildings
- Military and Communication Areas
- Subway Entrance
- Partly Demolished Buildings
- Demolished Buildings
- Built-Up Area with Fireproof Buildings Predominant
- Built-Up Area with Non-Fireproof Buildings Predominant
- Individual Fireproof Building
- Prominent Industrial Building
- Individual Dwelling, Fireproof
- Ruins of an Individual Dwelling
- Factory or Mill Chimney
- Factory or Mill with Chimney
- Factory or Mill without Chimney
- Mine or Open Pit Mine
- Operating Shaft or Mine
- Non-Operating Shaft or Mine
- Salt Mine
- Tailings Pile
- Pit
- Stone Quarry
- Gas Pump or Service Station
- Fuel Storage or Natural Gas Tank
- Oil or Natural Gas Derrick
- Small Hydroelectric Power Station
- Power Station
- Transformer Station
- Cemetery
- Burial Mound (height in metres)
- Triangulation Point on Burial Mound
- Triangulation Point
- Bench Mark
- Bench Mark (monumented)
- Telegraph Office
- Telephone Station
- Radio Station
- Radio Tower
- Airfield or Seaplane Base
- Landing Strip
- Small Bridge
- Pipe (Culvert)
- Tunnel
- Dismantled Railroad
- Double-track Railroad with First Class Station
- Railroad Under Construction
- Shore Embankment
- River or Ditch with Embankment
- Water Gauge
- Direction and velocity of current
- Water Level Mark
- Well
- Water Reservoir or Rain Water Pit
- Spring
- Isobath with value
- Heavy (Index) Contour Line
- Contour Line and Value
- Half Contour Line
- Spot Elevation Value
- Coniferous
- Deciduous
- Mixed
- Scrub

Key to Numbers on Mapping

SE64NE_York

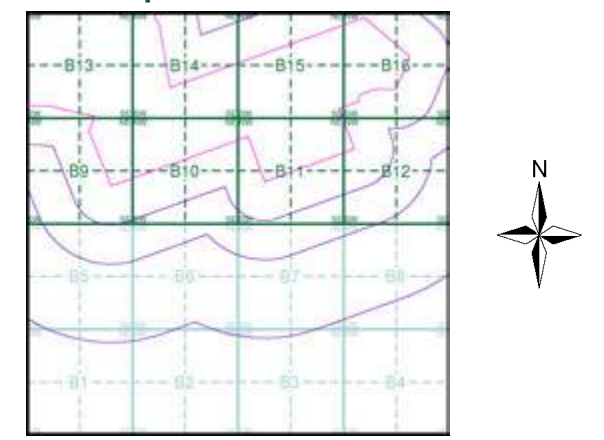
No.	Description
2	Airfield/Airport



Historical Mapping & Photography included:

Mapping Type	Scale	Date	Pg
Yorkshire	1:10,560	1851 - 1854	3
Yorkshire	1:10,560	1893	4
Yorkshire	1:10,560	1910 - 1911	5
Yorkshire	1:10,560	1931	6
Yorkshire	1:10,560	1938 - 1953	7
Yorkshire	1:10,560	1938	8
Yorkshire	1:10,560	1953	9
Ordnance Survey Plan	1:10,000	1958	10
Ordnance Survey Plan	1:10,000	1972	11
York	1:10,000	1980	12
10K Raster Mapping	1:10,000	1999	13
10K Raster Mapping	1:10,000	2006	14
VectorMap Local	1:10,000	2016	15

Russian Map - Slice B



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 467010, 447810
 Slice: B
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU

Landmark Information Group
 Tel: 0844 844 9952
 Fax: 0844 844 9951
 Web: www.envirocheck.co.uk



Yorkshire

Published 1851 - 1854

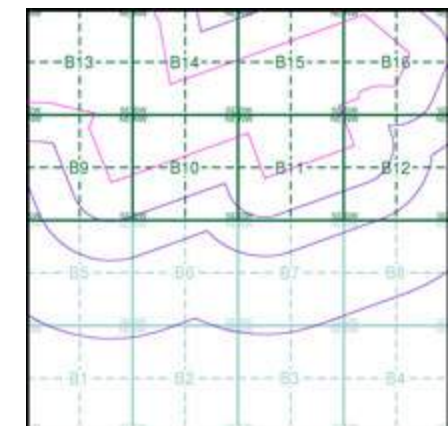
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

17400 1853 1:10,560	17500 1854 1:10,560
19100 1851 1:10,560	19200 1854 1:10,560

Historical Map - Slice B



Order Details

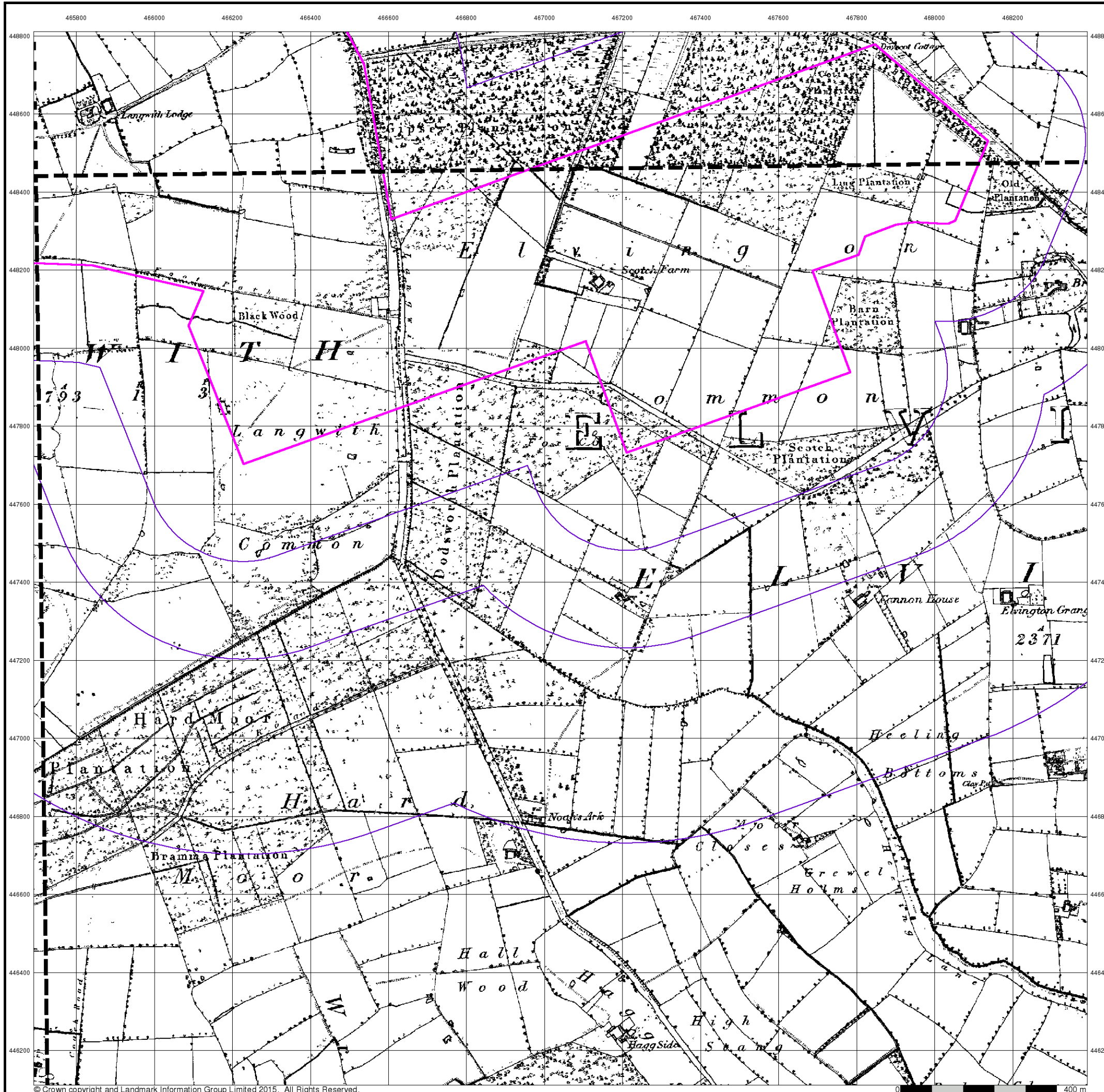
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 467010, 447810
 Slice: B
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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 Fax: 0844 844 9951
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Yorkshire

Published 1893

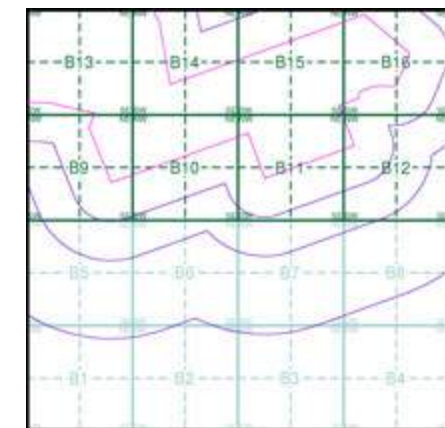
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

174SE 1893 1:10,560	175SW 1893 1:10,560
191NE 1893 1:10,560	192NW 1893 1:10,560

Historical Map - Slice B



Order Details

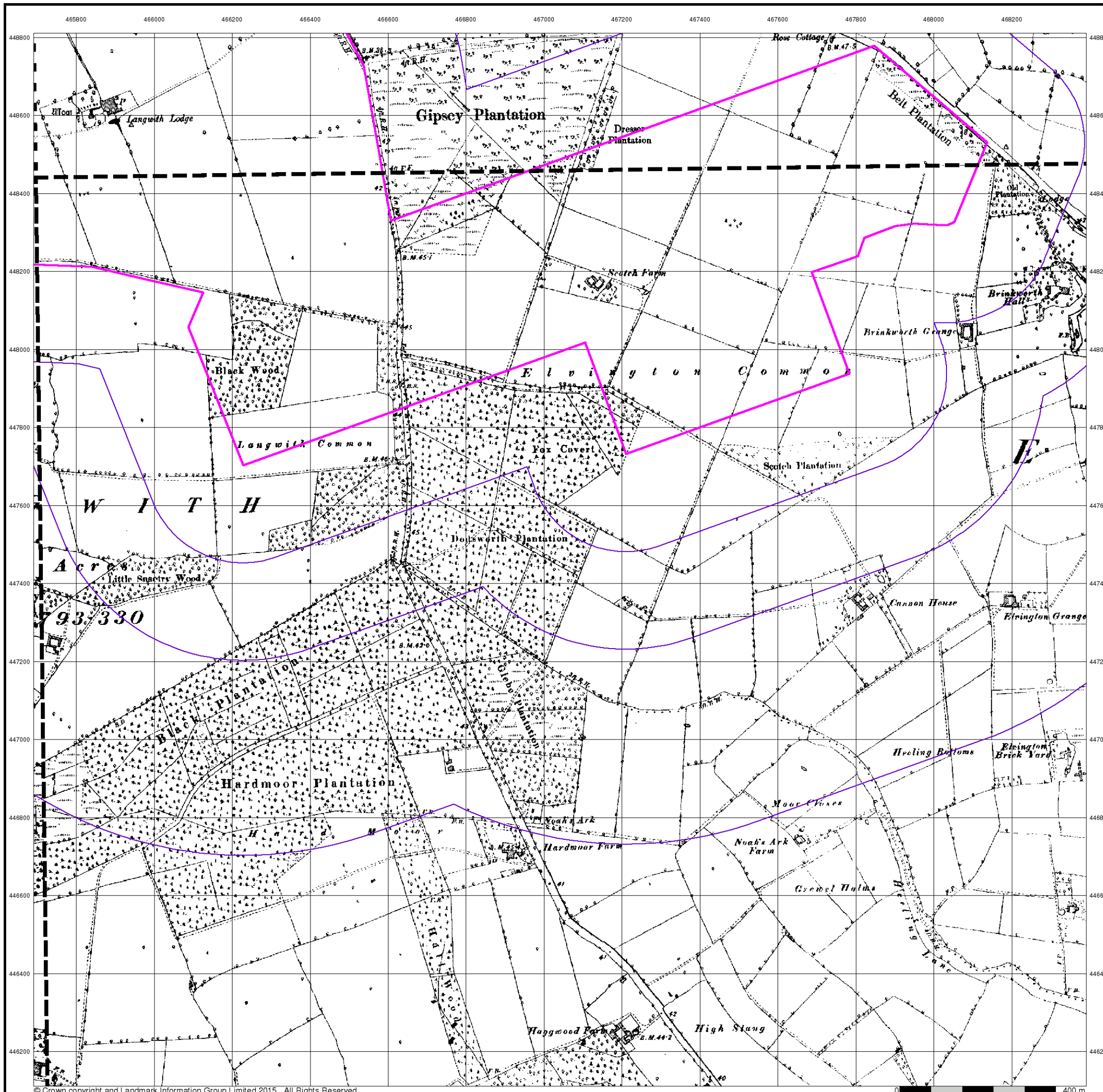
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 467010, 447810
 Slice: B
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

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Yorkshire

Published 1910 - 1911

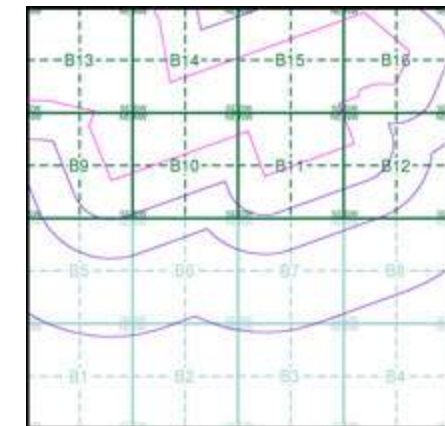
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

174SE 1910 1:10,560	175SW 1911 1:10,560
191NE 1910 1:10,560	192NW 1911 1:10,560

Historical Map - Slice B



Order Details

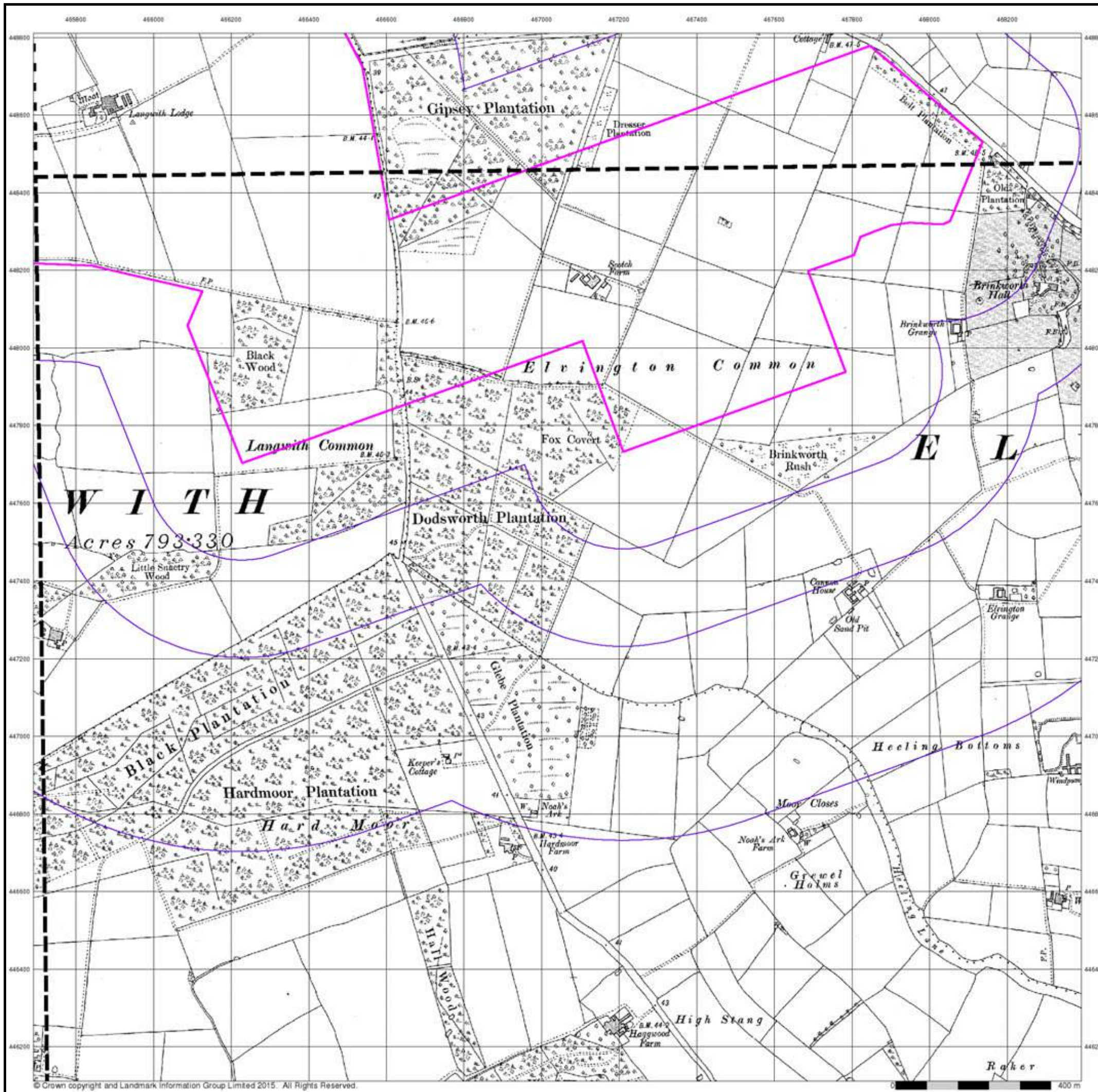
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 467010, 447810
 Slice: B
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



Tel: 0844 844 9952
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 Web: www.envirocheck.co.uk





Yorkshire

Published 1938 - 1953

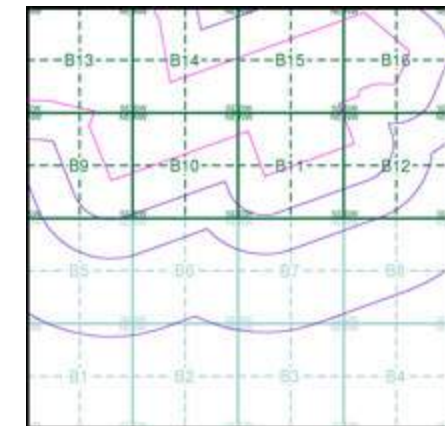
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

174SE 1938 1:10,560	175SW 1953 1:10,560
191NE 1952 1:10,560	192NW 1952 1:10,560

Historical Map - Slice B



Order Details

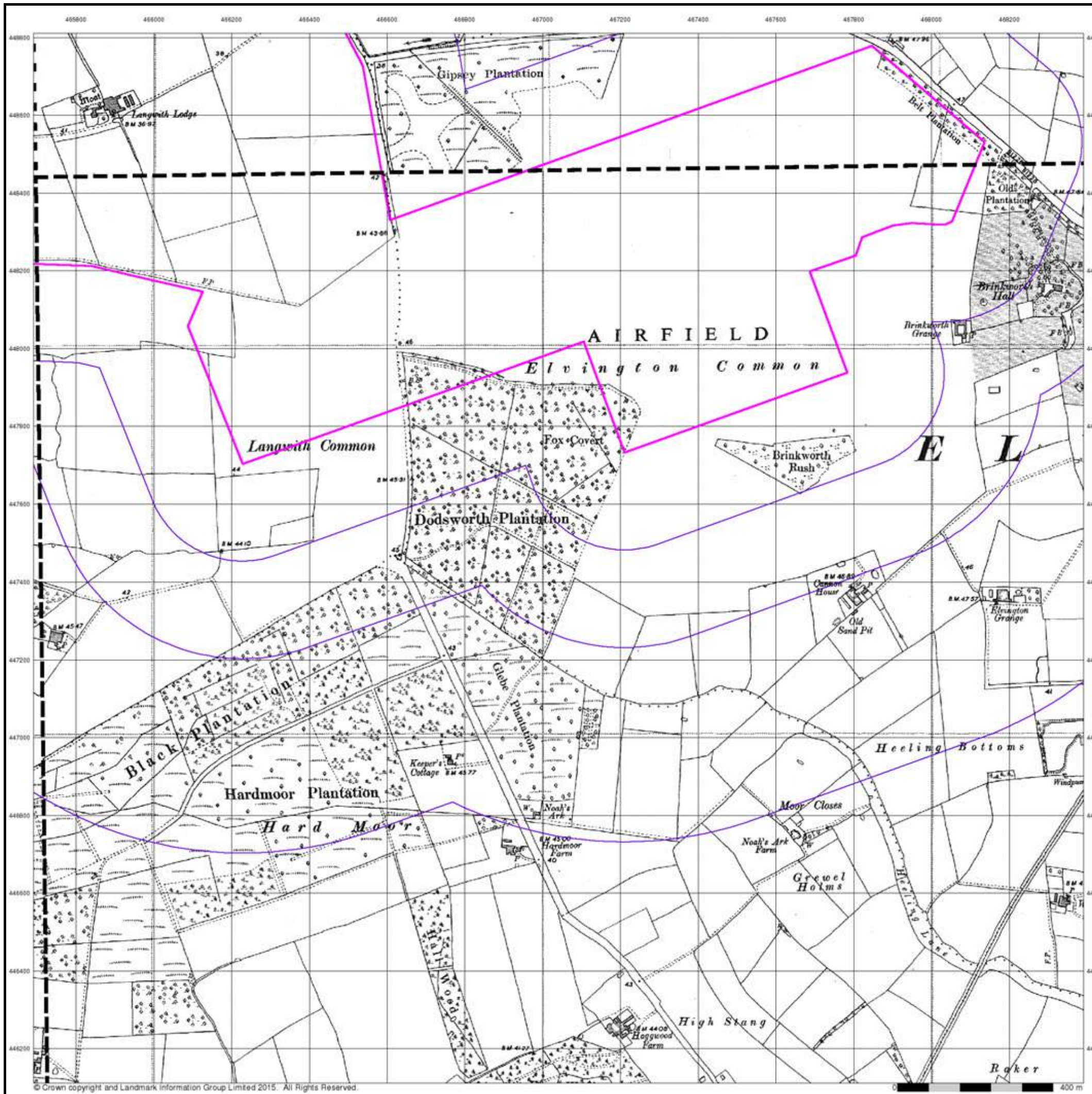
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 Customer Ref: 70011808-701
 National Grid Reference: 467010, 447810
 Slice: B
 Site Area (Ha): 246.75
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Site off Elvington Lane, York, YO41 4AU



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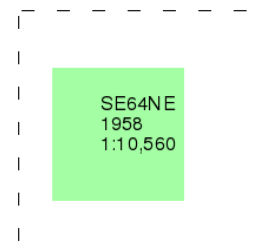
Ordnance Survey Plan

Published 1958

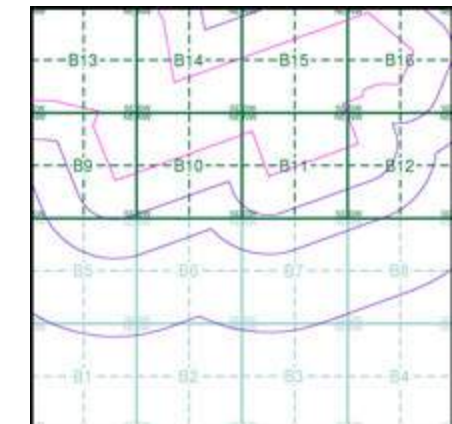
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice B



Order Details

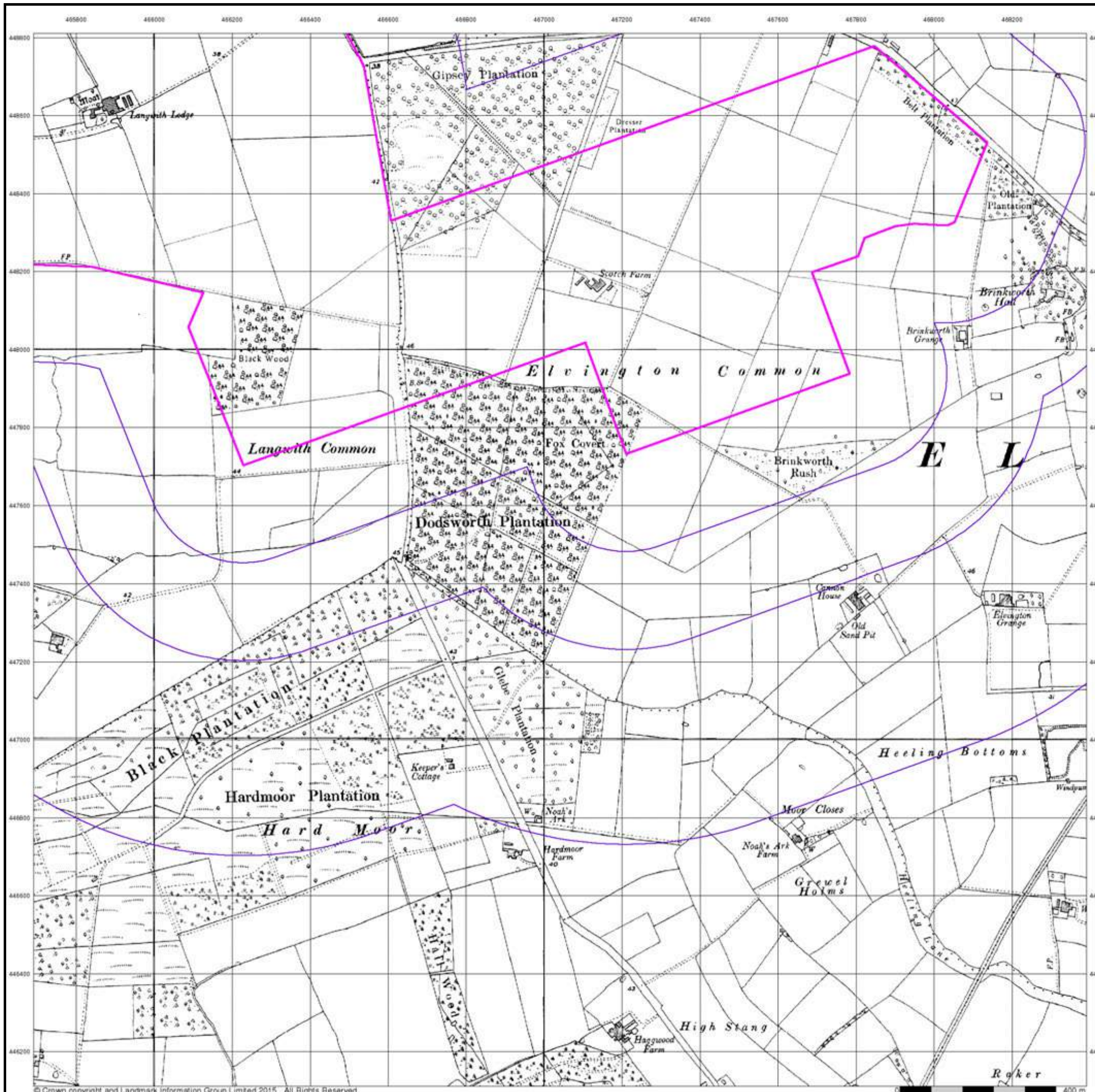
Order Number: 95641417_1_1
Customer Ref: 70011808-701
National Grid Reference: 467010, 447810
Slice: B
Site Area (Ha): 246.75
Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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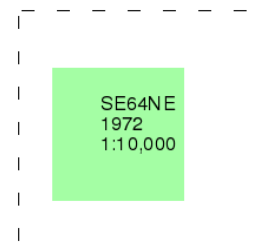
Ordnance Survey Plan

Published 1972

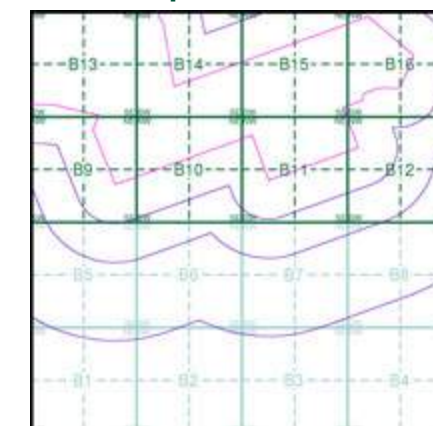
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice B



Order Details

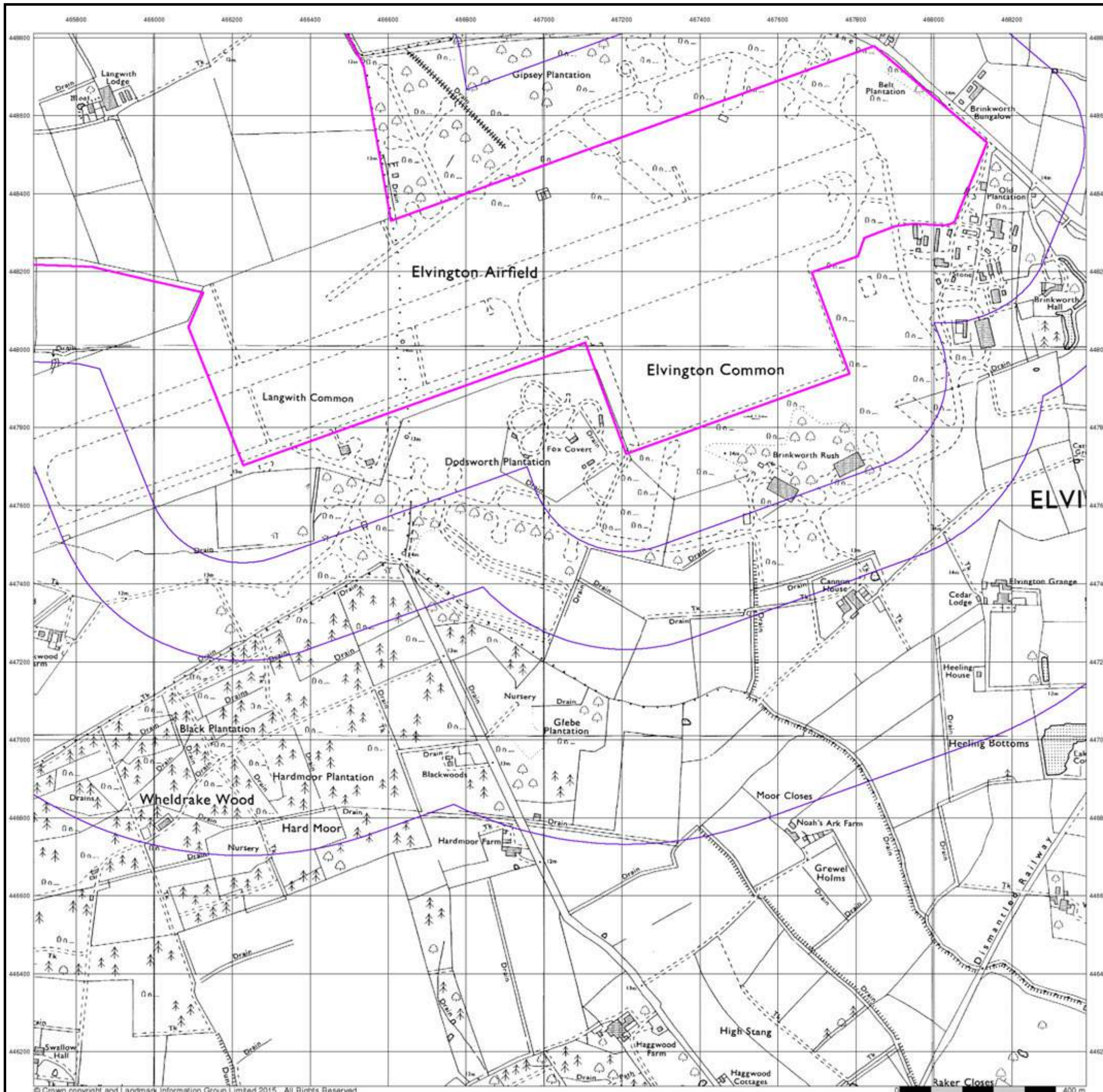
Order Number: 95641417_1_1
Customer Ref: 70011808-701
National Grid Reference: 467010, 447810
Slice: B
Site Area (Ha): 246.75
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Site Details

Site off Elvington Lane, York, YO41 4AU



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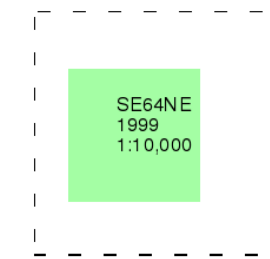
10k Raster Mapping

Published 1999

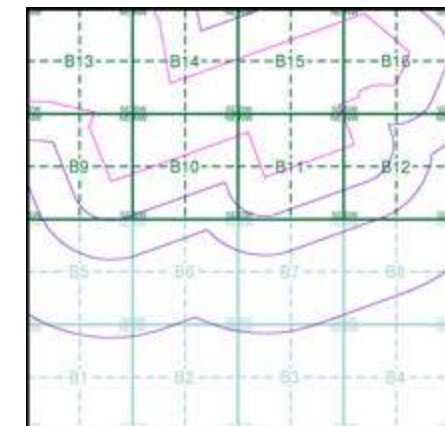
Source map scale - 1:10,000

The historical maps shown were produced from the Ordnance Survey's 1:10,000 colour raster mapping. These maps are derived from Landplan which replaced the old 1:10,000 maps originally published in 1970. The data is highly detailed showing buildings, fences and field boundaries as well as all roads, tracks and paths. Road names are also included together with the relevant road number and classification. Boundary information depiction includes county, unitary authority, district, civil parish and constituency.

Map Name(s) and Date(s)



Historical Map - Slice B



Order Details

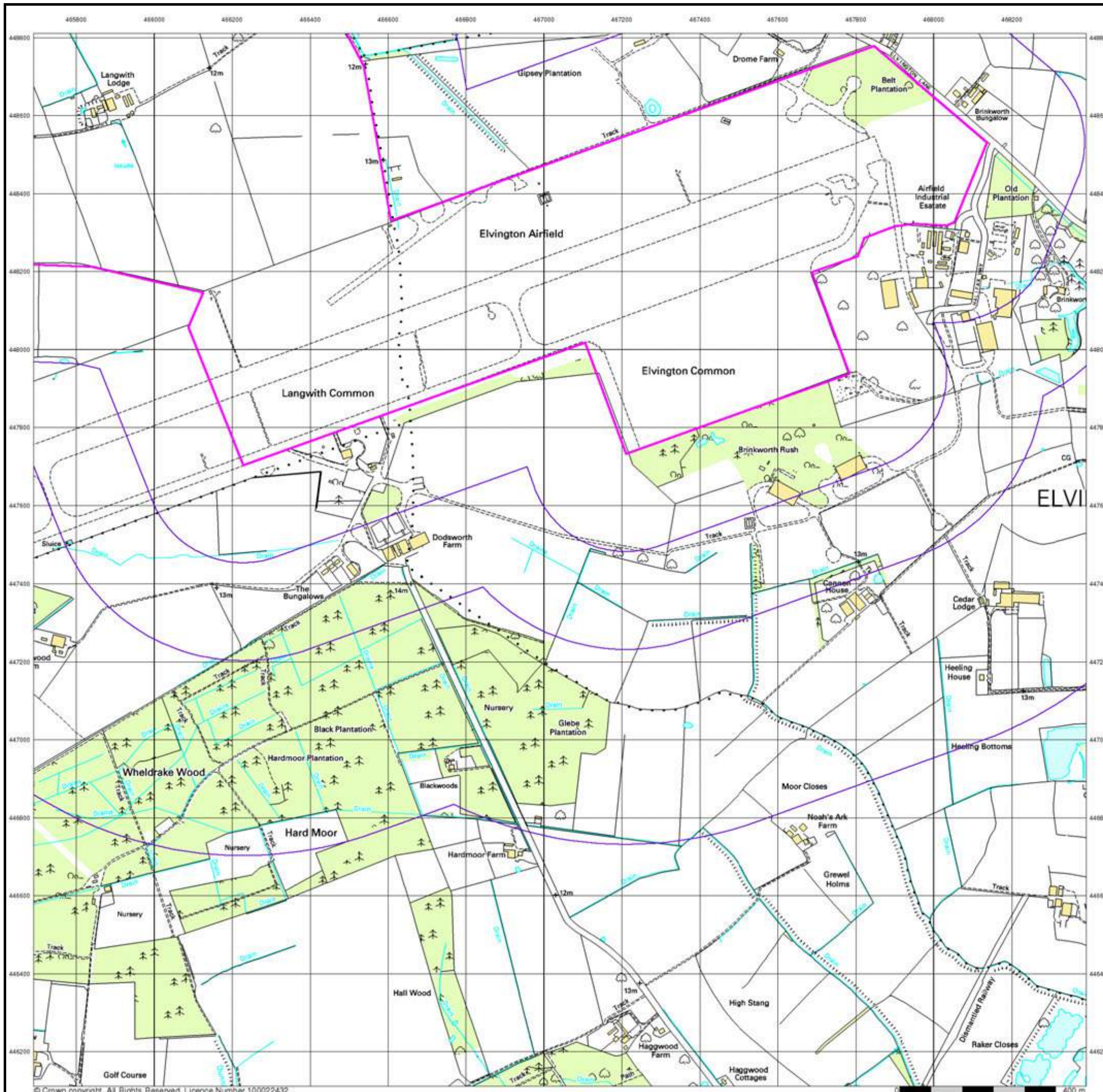
Order Number:	95641417_1_1
Customer Ref:	70011808-701
National Grid Reference:	467010, 447810
Slice:	B
Site Area (Ha):	246.75
Search Buffer (m):	1000

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Fax:	0844 844 9951
Web:	www.envirocheck.co.uk



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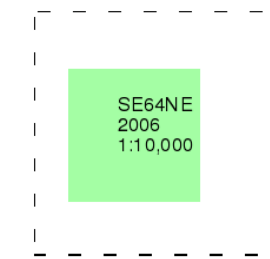
10k Raster Mapping

Published 2006

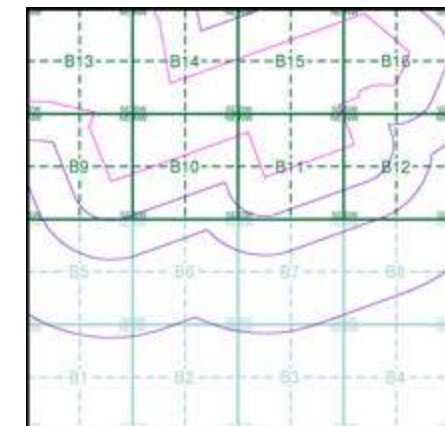
Source map scale - 1:10,000

The historical maps shown were produced from the Ordnance Survey's 1:10,000 colour raster mapping. These maps are derived from Landplan which replaced the old 1:10,000 maps originally published in 1970. The data is highly detailed showing buildings, fences and field boundaries as well as all roads, tracks and paths. Road names are also included together with the relevant road number and classification. Boundary information depiction includes county, unitary authority, district, civil parish and constituency.

Map Name(s) and Date(s)



Historical Map - Slice B



Order Details

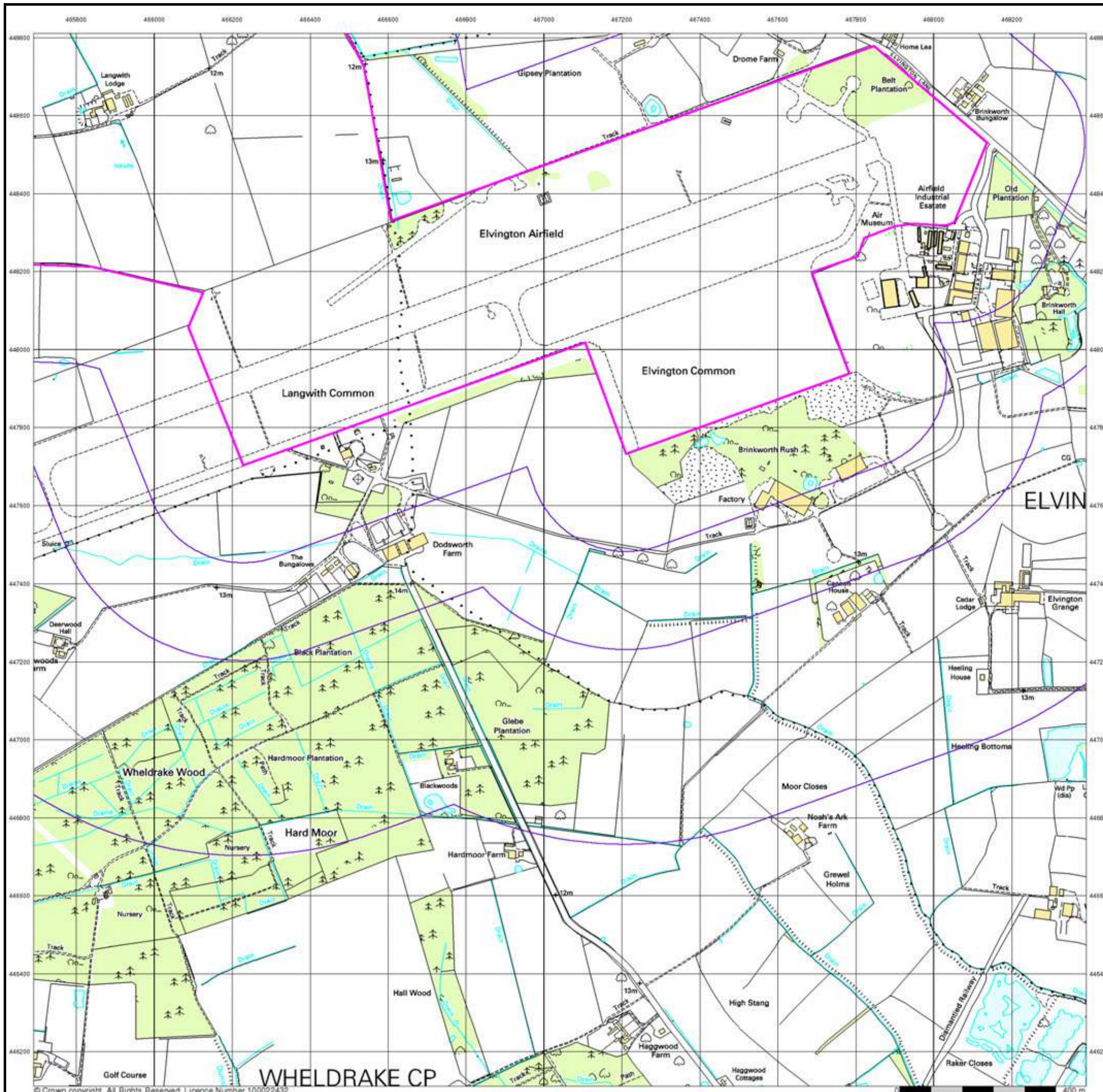
Order Number:	95641417_1_1
Customer Ref:	70011808-701
National Grid Reference:	467010, 447810
Slice:	B
Site Area (Ha):	246.75
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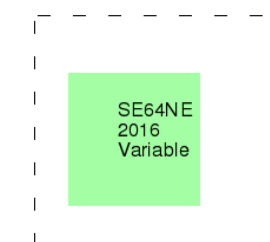
VectorMap Local

Published 2016

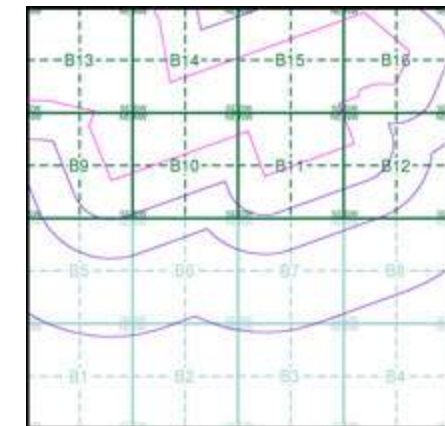
Source map scale - 1:10,000

VectorMap Local (Raster) is Ordnance Survey's highest detailed 'backdrop' mapping product. These maps are produced from OS's VectorMap Local, a simple vector dataset at a nominal scale of 1:10,000, covering the whole of Great Britain, that has been designed for creating graphical mapping. OS VectorMap Local is derived from large-scale information surveyed at 1:1250 scale (covering major towns and cities), 1:2500 scale (smaller towns, villages and developed rural areas), and 1:10 000 scale (mountain, moorland and river estuary areas).

Map Name(s) and Date(s)



Historical Map - Slice B



Order Details

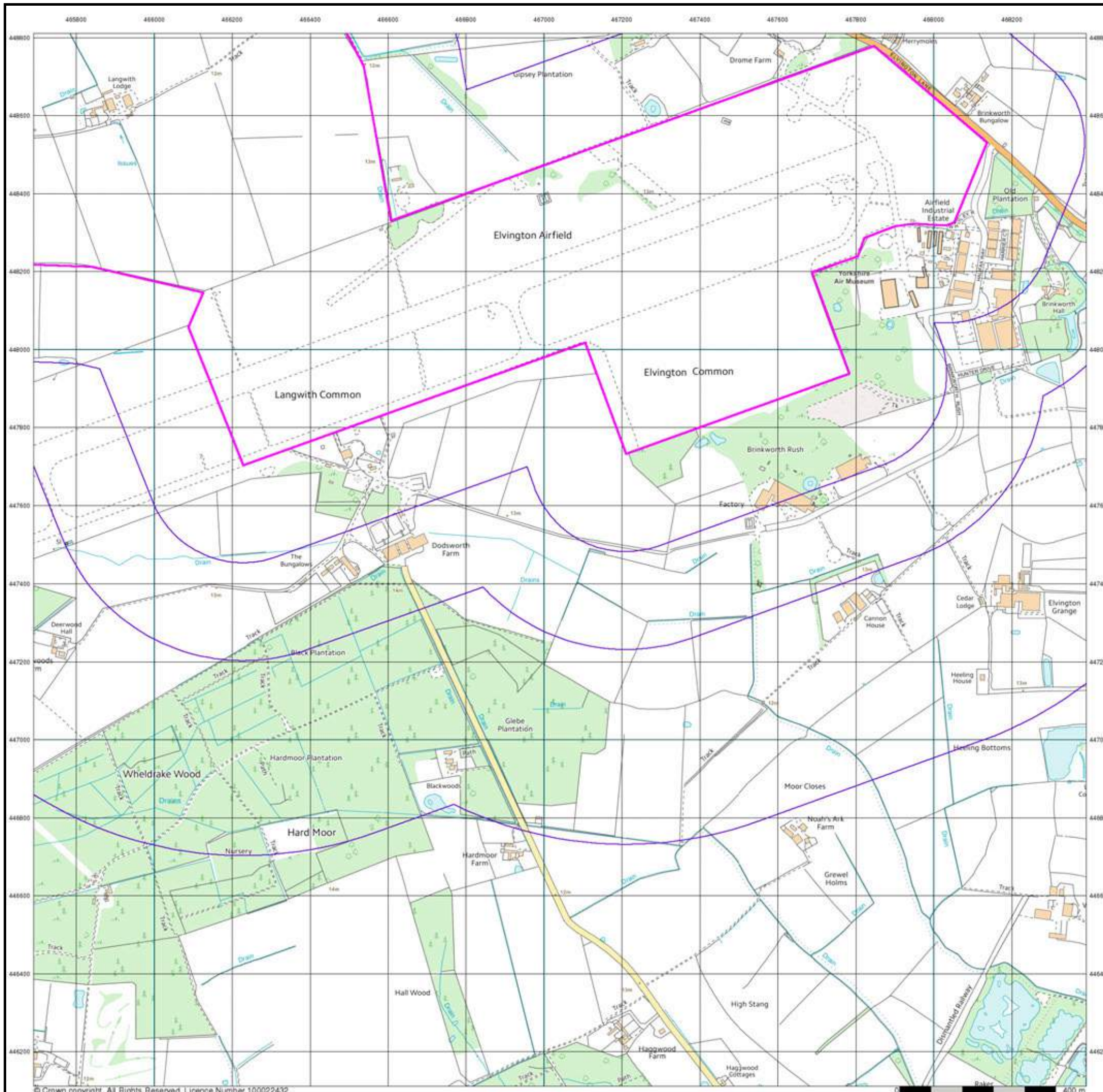
Order Number: 95641417_1_1
Customer Ref: 70011808-701
National Grid Reference: 467010, 447810
Slice: B
Site Area (Ha): 246.75
Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



Tel: 0844 844 9952
Fax: 0844 844 9951
Web: www.envirocheck.co.uk

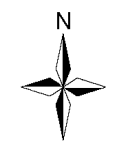
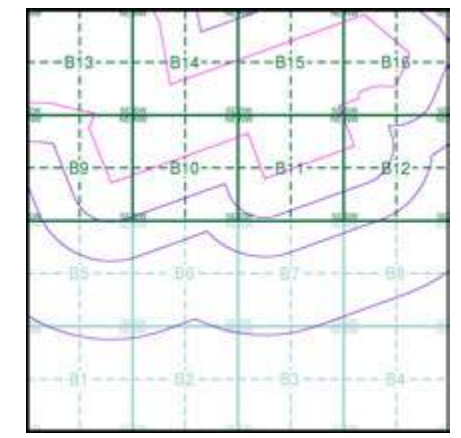


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- General**
- Specified Site
 - Specified Buffer(s)
 - Bearing Reference Point
 - Map ID
 - Several of Type at Location
- Agency and Hydrological**
- Contaminated Land Register Entry or Notice (Location)
 - Contaminated Land Register Entry or Notice
 - Discharge Consent
 - Enforcement or Prohibition Notice
 - Integrated Pollution Control
 - Integrated Pollution Prevention Control
 - Local Authority Integrated Pollution Prevention and Control
 - Local Authority Pollution Prevention and Control
 - Local Authority Pollution Prevention and Control Enforcement
 - Pollution Incident to Controlled Waters
 - Prosecution Relating to Authorised Processes
 - Prosecution Relating to Controlled Waters
 - Registered Radioactive Substance
 - River Network or Water Feature
 - River Quality Sampling Point
 - Substantiated Pollution Incident Register
 - Water Abstraction
 - Water Industry Act Referral
- Hazardous Substances**
- COMAH Site
 - Explosive Site
 - NIHHS Site
 - Planning Hazardous Substance Consent
 - Planning Hazardous Substance Enforcement
- Geological**
- BGS Recorded Mineral Site
- Waste**
- BGS Recorded Landfill Site (Location)
 - BGS Recorded Landfill Site
 - EA Historic Landfill (Buffered Point)
 - EA Historic Landfill (Polygon)
 - Integrated Pollution Control Registered Waste Site
 - Licensed Waste Management Facility (Landfill Boundary)
 - Licensed Waste Management Facility (Location)
 - Local Authority Recorded Landfill Site (Location)
 - Local Authority Recorded Landfill Site
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Water)
 - Potentially Infilled Land (Water)
 - Potentially Infilled Land (Water)
 - Registered Landfill Site (Location)
 - Registered Landfill Site (Point Buffered to 100m)
 - Registered Landfill Site (Point Buffered to 250m)
 - Registered Waste Transfer Site (Location)
 - Registered Waste Transfer Site
 - Registered Waste Treatment or Disposal Site (Location)
 - Registered Waste Treatment or Disposal Site

Site Sensitivity Map - Slice B



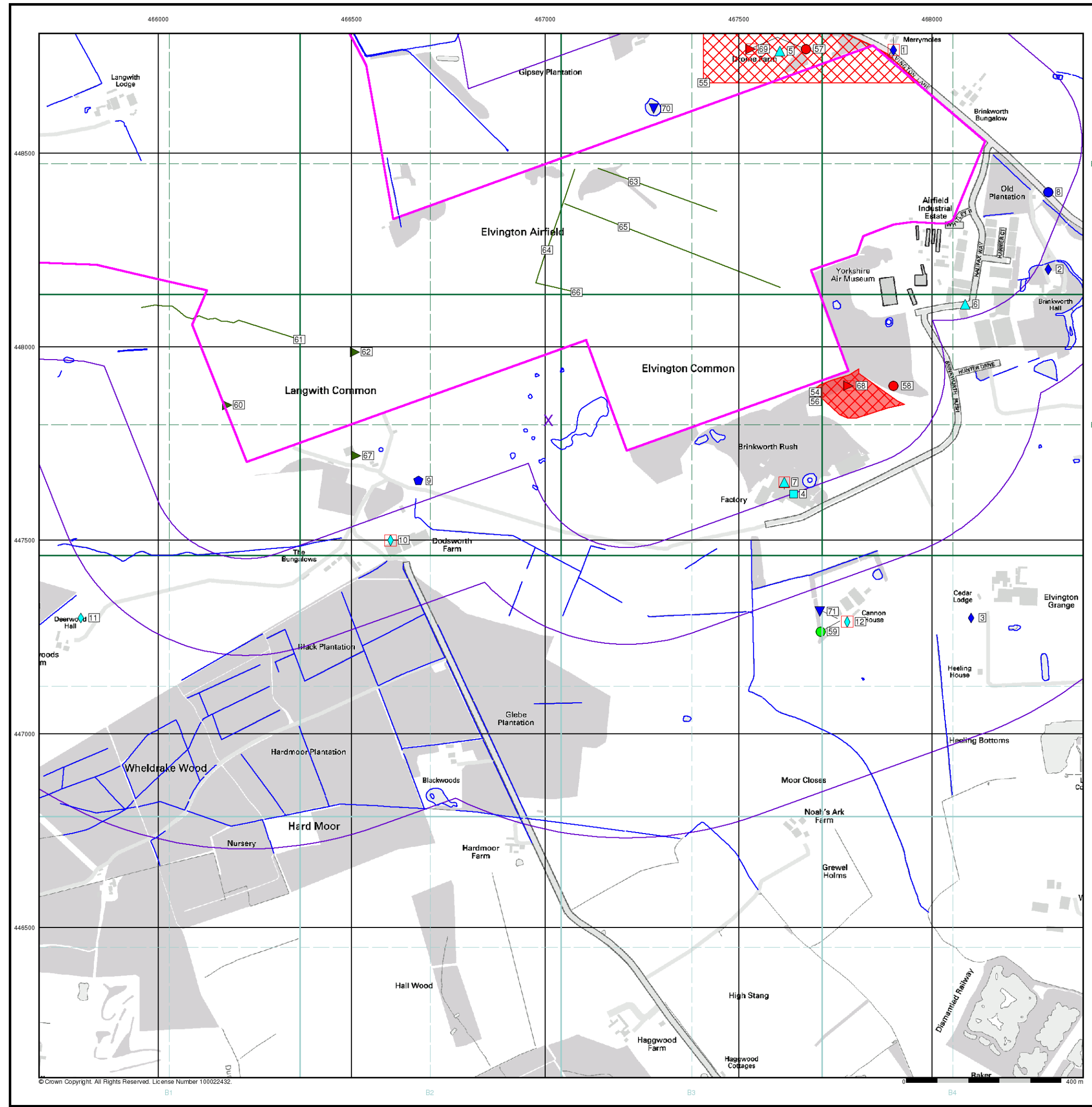
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Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 467010, 447810
 Slice: B
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

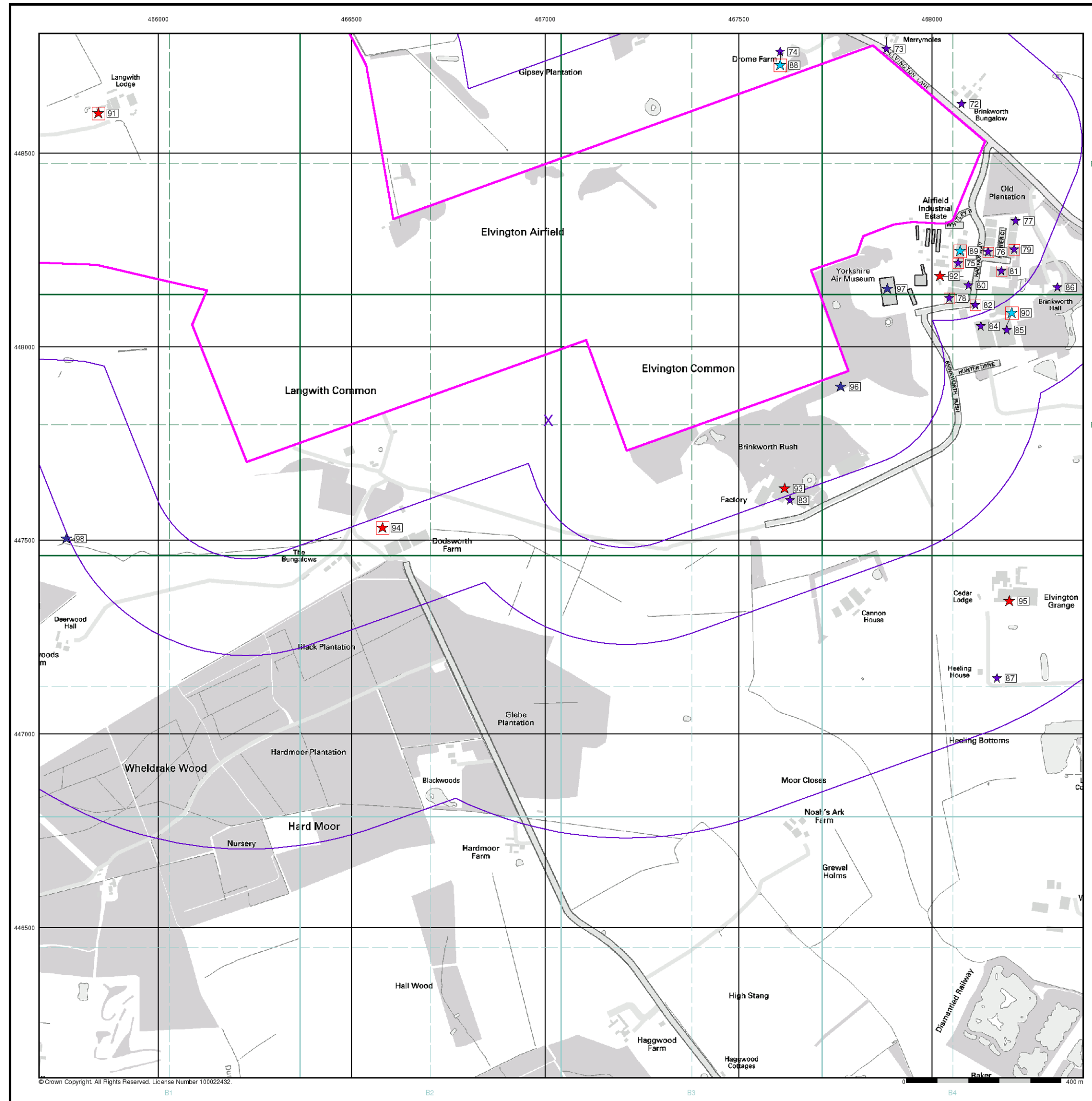
Site Details

Site off Elvington Lane, York, YO41 4AU

Landmark Information Group
 Tel: 0844 844 9952
 Fax: 0844 844 9951
 Web: www.envirocheck.co.uk



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Industrial Land Use Map

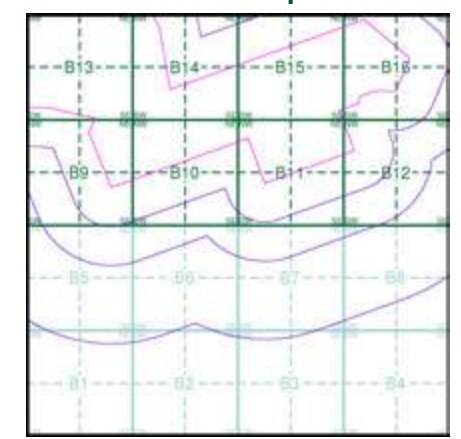
General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point
- Slice
- Map ID

Industrial Land Use

- Contemporary Trade Directory Entry
- Fuel Station Entry
- Gas Pipeline
- Points of Interest - Commercial Services
- Points of Interest - Education and Health
- Points of Interest - Manufacturing and Production
- Points of Interest - Public Infrastructure
- Points of Interest - Recreational and Environmental
- Underground Electrical Cables

Industrial Land Use Map - Slice B



Order Details

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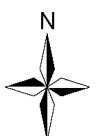
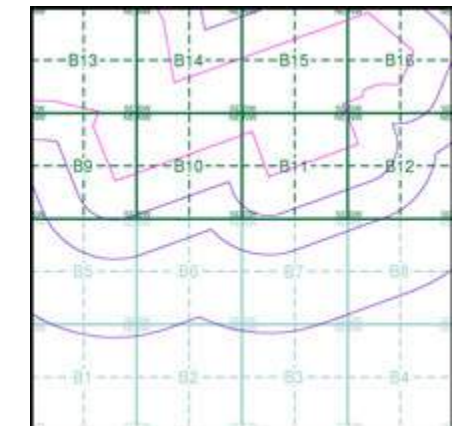
General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point

Agency and Hydrological (Flood)

- Extreme Flooding from Rivers or Sea without Defences (Zone 2)
- Flooding from Rivers or Sea without Defences (Zone 3)
- Area Benefiting from Flood Defence
- Flood Water Storage Areas
- Flood Defence

Flood Map - Slice B



Order Details

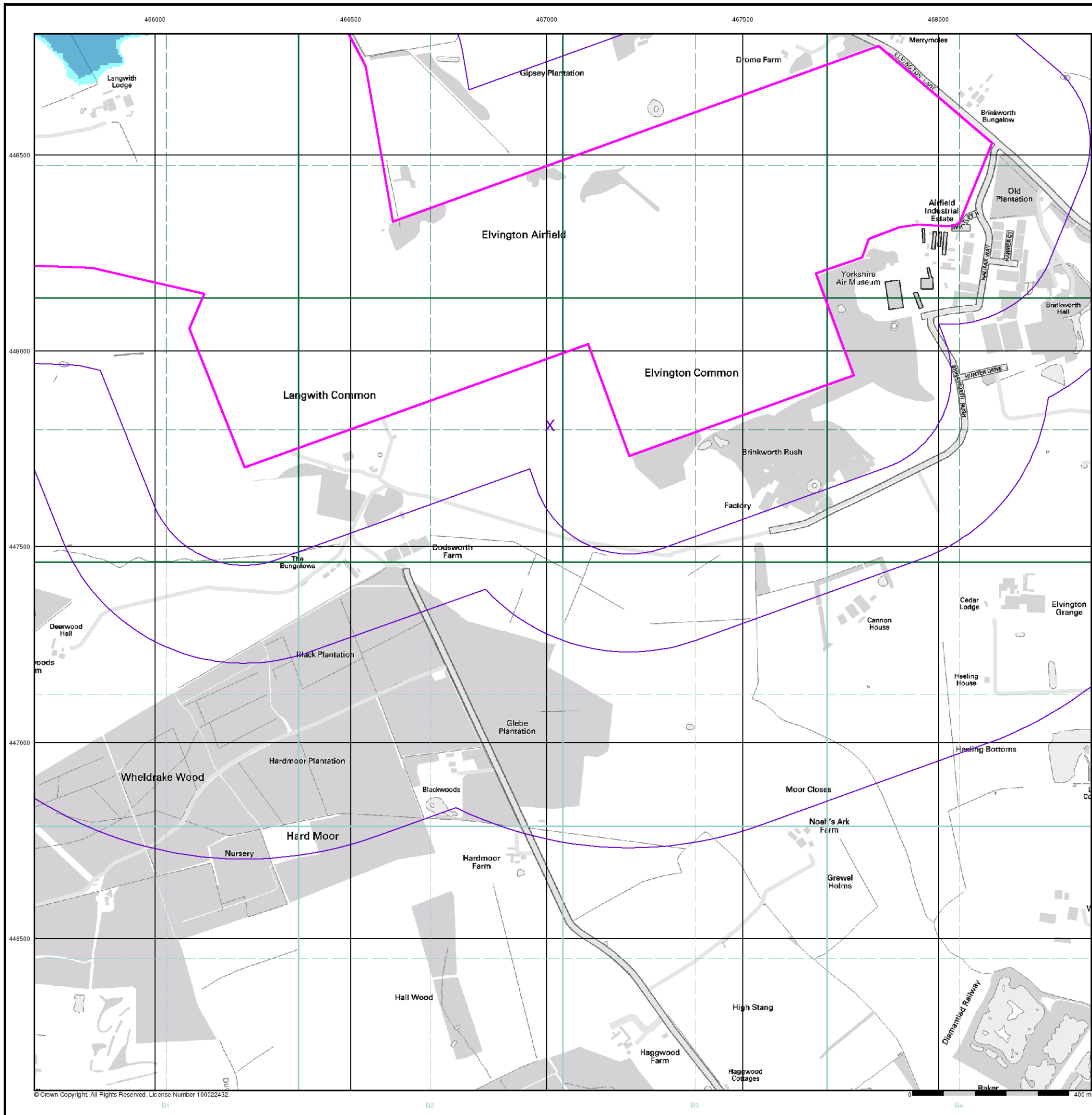
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 Slice: B
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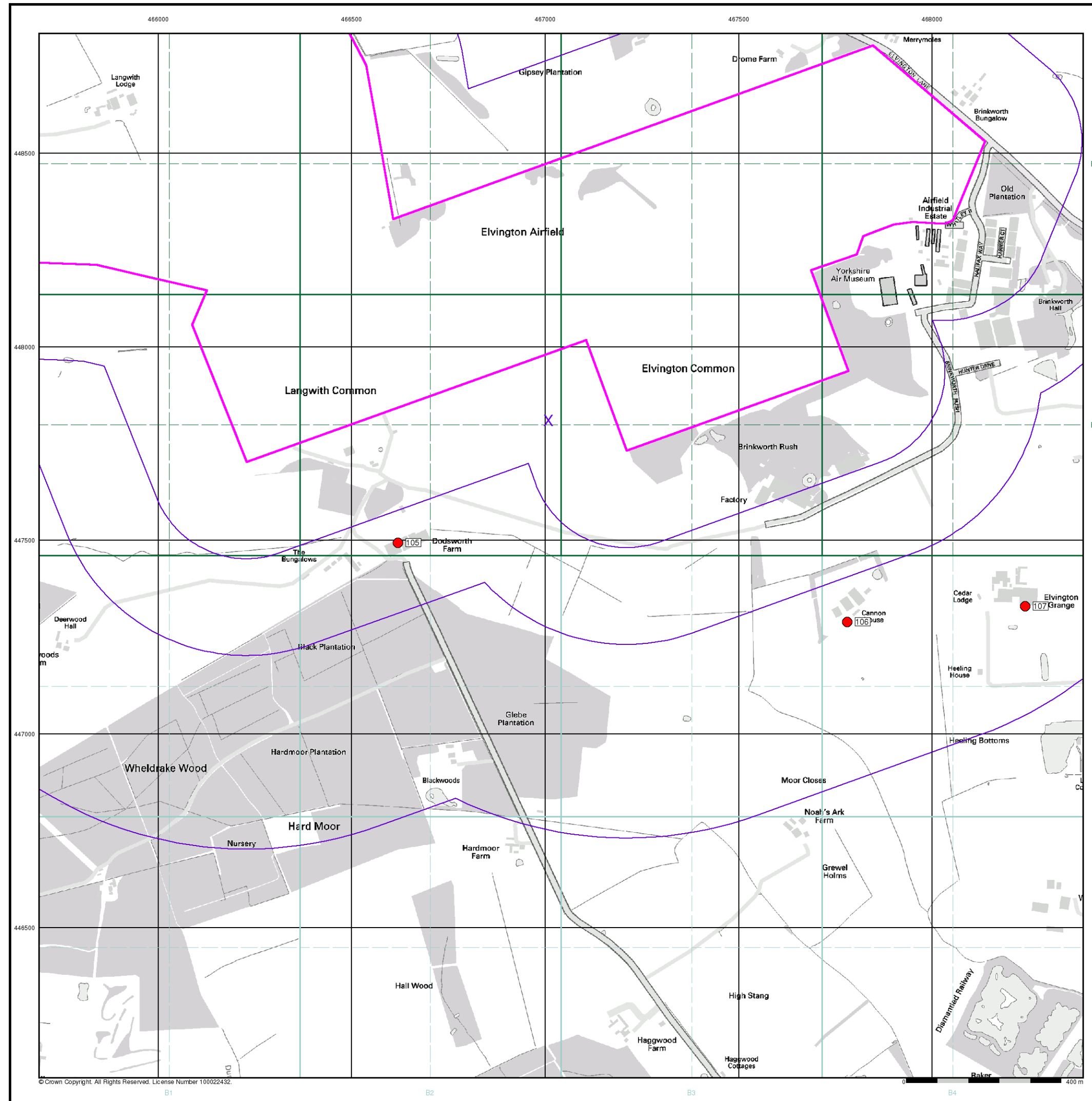
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General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point
- Map ID
- Several of Type at Location

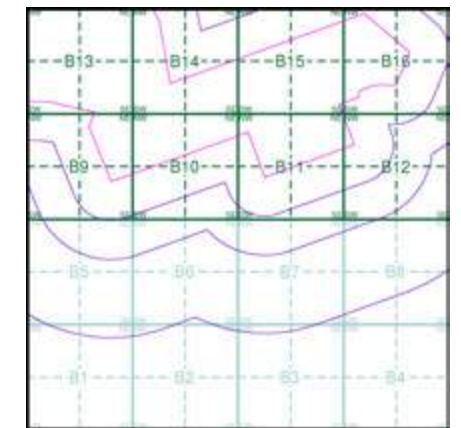
Agency and Hydrological (Boreholes)

- BGS Borehole Depth 0 - 10m
- BGS Borehole Depth 10 - 30m
- BGS Borehole Depth 30m +
- Confidential
- Other

For Borehole information please refer to the Borehole .csv file which accompanied this slice.

A copy of the BGS Borehole Ordering Form is available to download from the Support section of www.envirocheck.co.uk.

Borehole Map - Slice B



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 467010, 447810
 Slice: B
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point
- Map ID

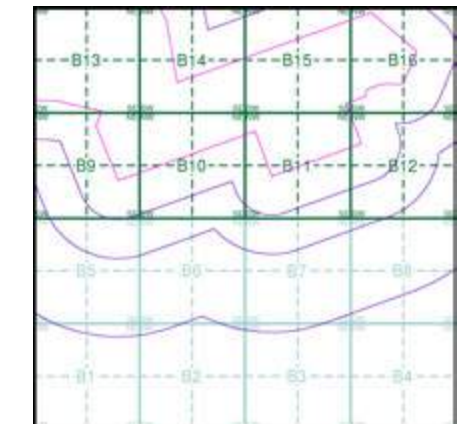
Detailed River Network Data

- Primary River
- Secondary River
- Tertiary River
- Canal
- Canal Tunnel
- Undefined River
- Lake/Reservoir
- Offline Drainage Feature
- Extended Culvert (greater than 50m)
- Underground River (inferred)
- Underground River (local knowledge)
- Downstream of High Water Mark
- Downstream of Seaward Extension
- Not assigned River feature

Contours (height in metres)

- Standard Contour 105
- Master Contour 100
- Spot Height *167.3
- MLW Mean Low Water
- MHW Mean High Water

E/ANRW Detailed River Network Map - Slice B



Order Details

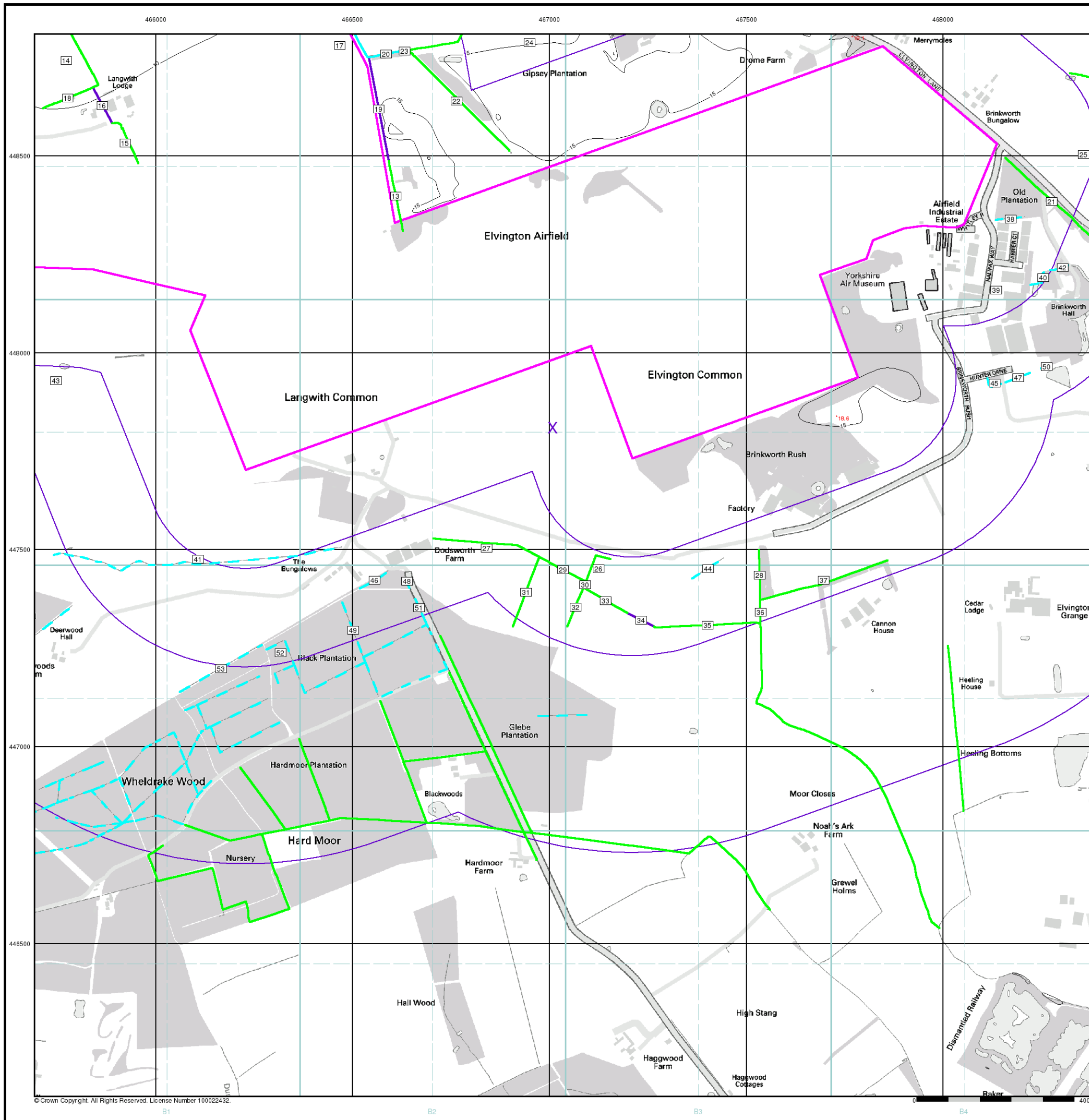
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Site Details

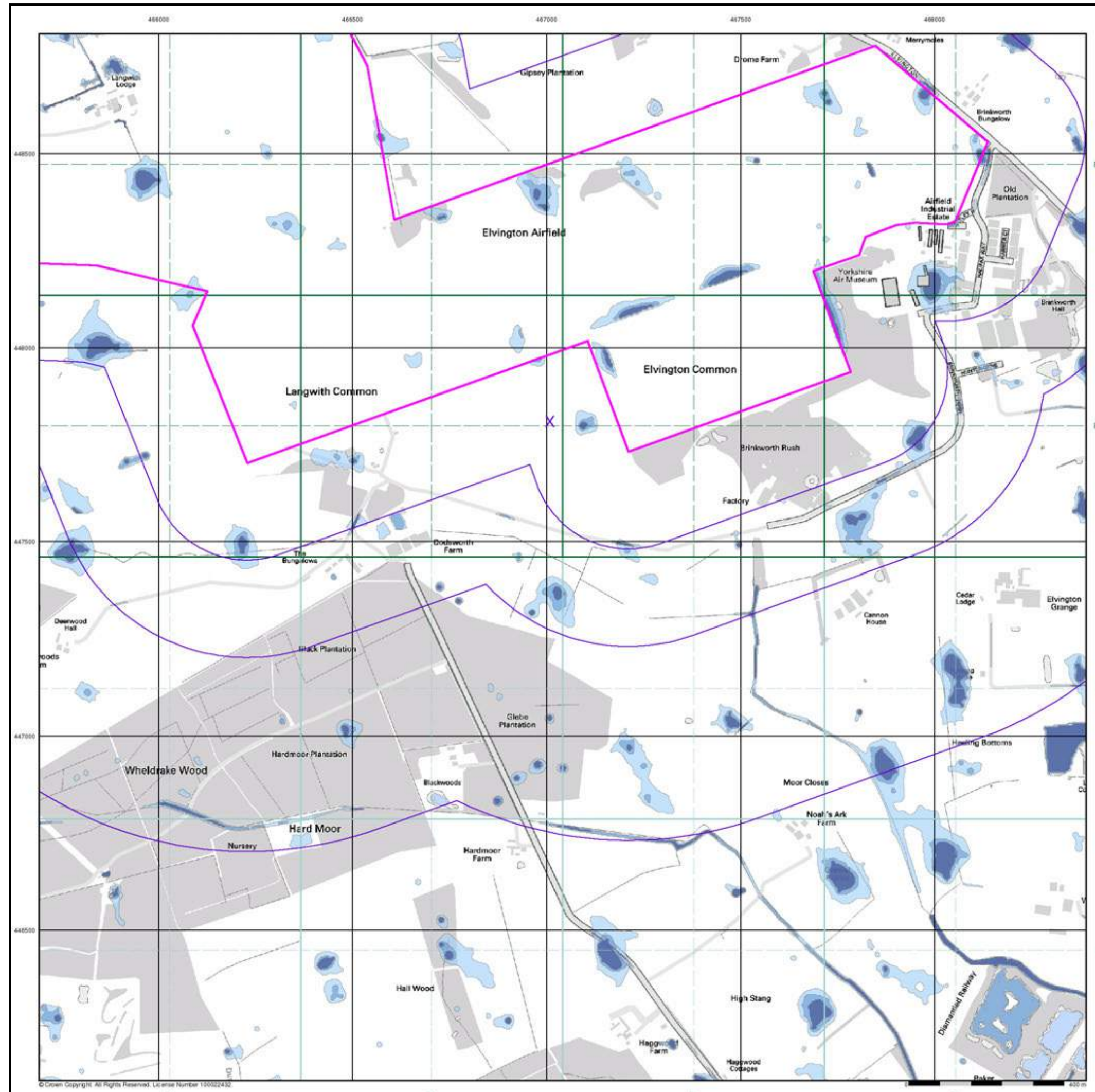
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General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point

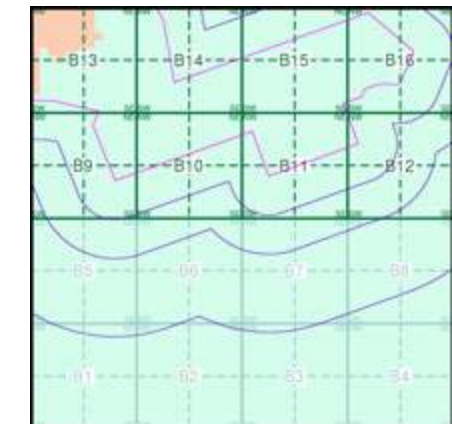
Risk of Flooding from Surface Water

-  High - 30 Year Return
-  Medium - 100 Year Return
-  Low - 1000 Year Return

Suitability

- See the suitability map below
-  National to county
 -  County to town
 -  Town to street
 -  Street to parcels of land
 -  Property

E/ANRW Suitability Map - Slice B



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 467010, 447810
 Slice: B
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU

Historical Mapping Legends

Ordnance Survey County Series 1:10,560

	Gravel Pit		Sand Pit		Other Pits
	Quarry		Shingle		Orchard
	Osiers		Reeds		Marsh
	Mixed Wood		Deciduous		Brushwood
	Fir		Furze		Rough Pasture
	Arrow denotes flow of water		Trigonometrical Station		
	Site of Antiquities		Bench Mark		
	Pump, Guide Post, Signal Post		Well, Spring, Boundary Post		
	-285 Surface Level				
	Sketched Contour		Instrumental Contour		
	Main Roads		Minor Roads		
	Sunken Road		Raised Road		
	Road over Railway		Railway over River		
	Railway over Road		Level Crossing		
	Road over River or Canal		Road over Stream		
	Road over Stream				
	County Boundary (Geographical)				
	County & Civil Parish Boundary				
	Administrative County & Civil Parish Boundary				
	County Borough Boundary (England)				
	County Burgh Boundary (Scotland)				
	Rural District Boundary				
	Civil Parish Boundary				

Ordnance Survey Plan 1:10,000

	Chalk Pit, Clay Pit or Quarry		Gravel Pit
	Sand Pit		Disused Pit or Quarry
	Refuse or Slag Heap		Lake, Loch or Pond
	Dunes		Boulders
	Coniferous Trees		Non-Coniferous Trees
	Orchard		Scrub
	Coppice		Heath
	Rough Grassland		Marsh
	Reeds		Saltings
	Building		Glasshouse
	Sloping Masonry		Pylon
	Electricity Transmission Line		Pole
	Cutting		Embankment
	Standard Gauge Multiple Track		Standard Gauge Single Track
	Siding, Tramway or Mineral Line		Narrow Gauge
	Geographical County		
	Administrative County, County Borough or County of City		
	Municipal Borough, Urban or Rural District, Burgh or District Council		
	Borough, Burgh or County Constituency Shown only when not coincident with other boundaries		
	Civil Parish Shown alternately when coincidence of boundaries occurs		
	BP, BS Boundary Post or Stone		Pol Sta Police Station
	Ch Church		PO Post Office
	CH Club House		PC Public Convenience
	F E Sta Fire Engine Station		PH Public House
	FB Foot Bridge		SB Signal Box
	Fn Fountain		Spr Spring
	GP Guide Post		TCB Telephone Call Box
	MP Mile Post		TCP Telephone Call Post
	MS Mile Stone		W Well

1:10,000 Raster Mapping

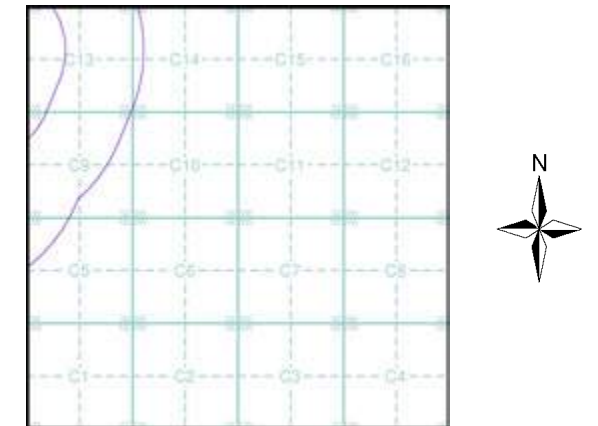
	Gravel Pit		Refuse tip or slag heap
	Rock		Rock (scattered)
	Boulders		Boulders (scattered)
	Shingle		Mud
	Sand		Sand Pit
	Slopes		Top of cliff
	General detail		Underground detail
	Overhead detail		Narrow gauge railway
	Multi-track railway		Single track railway
	County boundary (England only)		Civil, parish or community boundary
	District, Unitary, Metropolitan, London Borough boundary		Constituency boundary
	Area of wooded vegetation		Non-coniferous trees
	Non-coniferous trees (scattered)		Coniferous trees
	Coniferous trees (scattered)		Positioned tree
	Orchard		Coppice or Osiers
	Rough Grassland		Heath
	Scrub		Marsh, Salt Marsh or Reeds
	Water feature		Flow arrows
	MHW(S) Mean high water (springs)		MLW(S) Mean low water (springs)
	Telephone line (where shown)		Electricity transmission line (with poles)
	Bench mark (where shown)		Triangulation station
	Point feature (e.g. Guide Post or Mile Stone)		Pylon, flare stack or lighting tower
	Site of (antiquity)		Glasshouse
	General Building		Important Building



Historical Mapping & Photography included:

Mapping Type	Scale	Date	Pg
Yorkshire	1:10,560	1854	3
Yorkshire	1:10,560	1893 - 1894	4
Yorkshire	1:10,560	1911	5
Yorkshire	1:10,560	1952 - 1953	6
Ordnance Survey Plan	1:10,000	1958	7
Ordnance Survey Plan	1:10,000	1972	8
York	1:10,000	1980	9
10K Raster Mapping	1:10,000	1999	10
10K Raster Mapping	1:10,000	2006	11
VectorMap Local	1:10,000	2016	12

Historical Map - Slice C



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468700, 448170
 Slice: C
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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 Fax: 0844 844 9951
 Web: www.envirocheck.co.uk

Russian Military Mapping Legends

1:5,000 and 1:10,000 mapping

a. Not drawn to scale b. Drawn to scale

Government and Administrative Buildings
Military and Industrial Buildings
Military and Communication Areas
Fireproof Building
Non-fireproof Building
Factory, mill, and flour mill, with chimneys
Power Station, drawn to scale
Radio Station, drawn to scale
Abandoned Open-pit Mine or Quarry
Pit
Tailings Pile
Bench Mark
Drill Hole
Burial Mound
Triangulation Point on Burial Mound
Single-track Railroad
Double-track Railroad and Station Building
Coniferous Forest
Deciduous Forest
Mixed Forest
Lawns
Citrus Orchard
Wet Ground
Scattered Vegetation

Military and Industrial Buildings
Subway Entrance
Prominent Fireproof Building
Non-fireproof Building (non-dwelling)
Factory, mill, and flour mill, without chimneys
Hydroelectric Power Station
Telephone Station, drawn to scale
Open-pit Salt Mine
Oil Deposit or Well
Oil Seepage
Fuel Storage Tanks
Natural Gas Tank
Burial Mound
Triangulation Point
Telephone Station
Airfield or Seaplane Base
Landing Strip
Water Reservoir or Rain Water Pit
Spring
Isobath with value
Spot Elevation Value
Coniferous
Deciduous
Mixed
Scrub

Values for prominent elevations
 243.8
 186.0
 0.2
 180/12

Numbers for spot elevations, depth soundings, contour lines, etc.
 +2.0
 +1.2
 67.8

Velocity of the current, width of river bed, depth of river
 0.2

Fractional terms: length and capacity of bridges; depth of fords and condition of the river bottom; height of forest and the diameter of trees
 180/12

Russian Alphabet (For reference and phonetic interpretation of map text)

А а (A)	З з (Z)	П п (P)	Ч ч (CH)
Б б (B)	И и (I)	Р р (R)	Ш ш (SH)
В в (V)	Й й (Y)	С с (S)	Щ щ (SHCH)
Г г (G)	К к (K)	Т т (T)	Ъ (-)
Д д (D)	Л л (L)	У у (U)	Ы (Y)
Е е (E)	М м (M)	Ф ф (F)	Ь (')
Ё ё (YO)	Н н (N)	Х х (KH)	Э э (E)
Ж ж (ZH)	О о (O)	Ц ц (TS)	Ю ю (YU or IU)
			Я я (YA or IA)

1:25,000 mapping

a. Not drawn to scale b. Drawn to scale

Government and Administrative Buildings
Military and Industrial Buildings
Military and Communication Areas
Partly Demolished Buildings
Built-Up Area with Fireproof Buildings Predominant
Individual Fireproof Building
Individual Dwelling, Fireproof
Factory or Mill Chimney
Operating Shaft or Mine
Pit
Oil or Natural Gas Derrick
Cemetery
Bench Mark
Radio Station
Shore Embankment
Well
Heavy (Index) Contour Line
Coniferous

Military and Industrial Buildings
Subway Entrance
Demolished Buildings
Built-Up Area with Non-Fireproof Buildings Predominant
Prominent Industrial Building
Ruins of an Individual Dwelling
Factory or Mill with Chimney
Non-Operating Shaft or Mine
Stone Quarry
Gas Pump or Service Station
Fuel Storage or Natural Gas Tank
Small Hydroelectric Power Station
Power Station
Transformer Station
Burial Mound (height in metres)
Triangulation Point on Burial Mound
Triangulation Point
Telegraph Office
Telephone Station
Airfield or Seaplane Base
Landing Strip
Water Reservoir or Rain Water Pit
Spring
Isobath with value
Spot Elevation Value
Deciduous
Mixed
Scrub

Factory or Mill without Chimney
Mine or Open Pit Mine
Salt Mine
Tailings Pile
Oil or Natural Gas Tank
Small Hydroelectric Power Station
Power Station
Transformer Station
Burial Mound (height in metres)
Triangulation Point on Burial Mound
Triangulation Point
Telegraph Office
Telephone Station
Airfield or Seaplane Base
Landing Strip
Water Reservoir or Rain Water Pit
Spring
Isobath with value
Spot Elevation Value
Deciduous
Mixed
Scrub

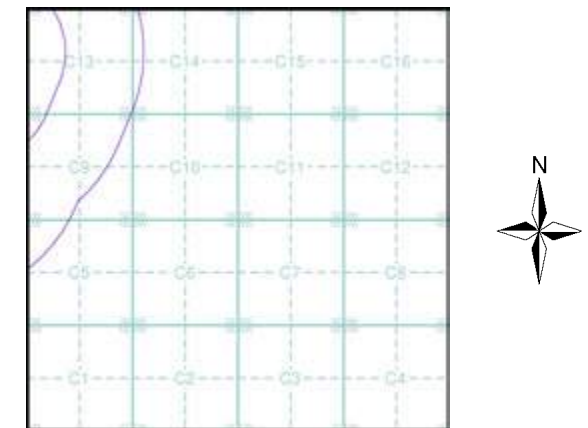
Key to Numbers on Mapping



Historical Mapping & Photography included:

Mapping Type	Scale	Date	Pg
Yorkshire	1:10,560	1854	3
Yorkshire	1:10,560	1893 - 1894	4
Yorkshire	1:10,560	1911	5
Yorkshire	1:10,560	1952 - 1953	6
Ordnance Survey Plan	1:10,000	1958	7
Ordnance Survey Plan	1:10,000	1972	8
York	1:10,000	1980	9
10K Raster Mapping	1:10,000	1999	10
10K Raster Mapping	1:10,000	2006	11
VectorMap Local	1:10,000	2016	12

Russian Map - Slice C



Order Details

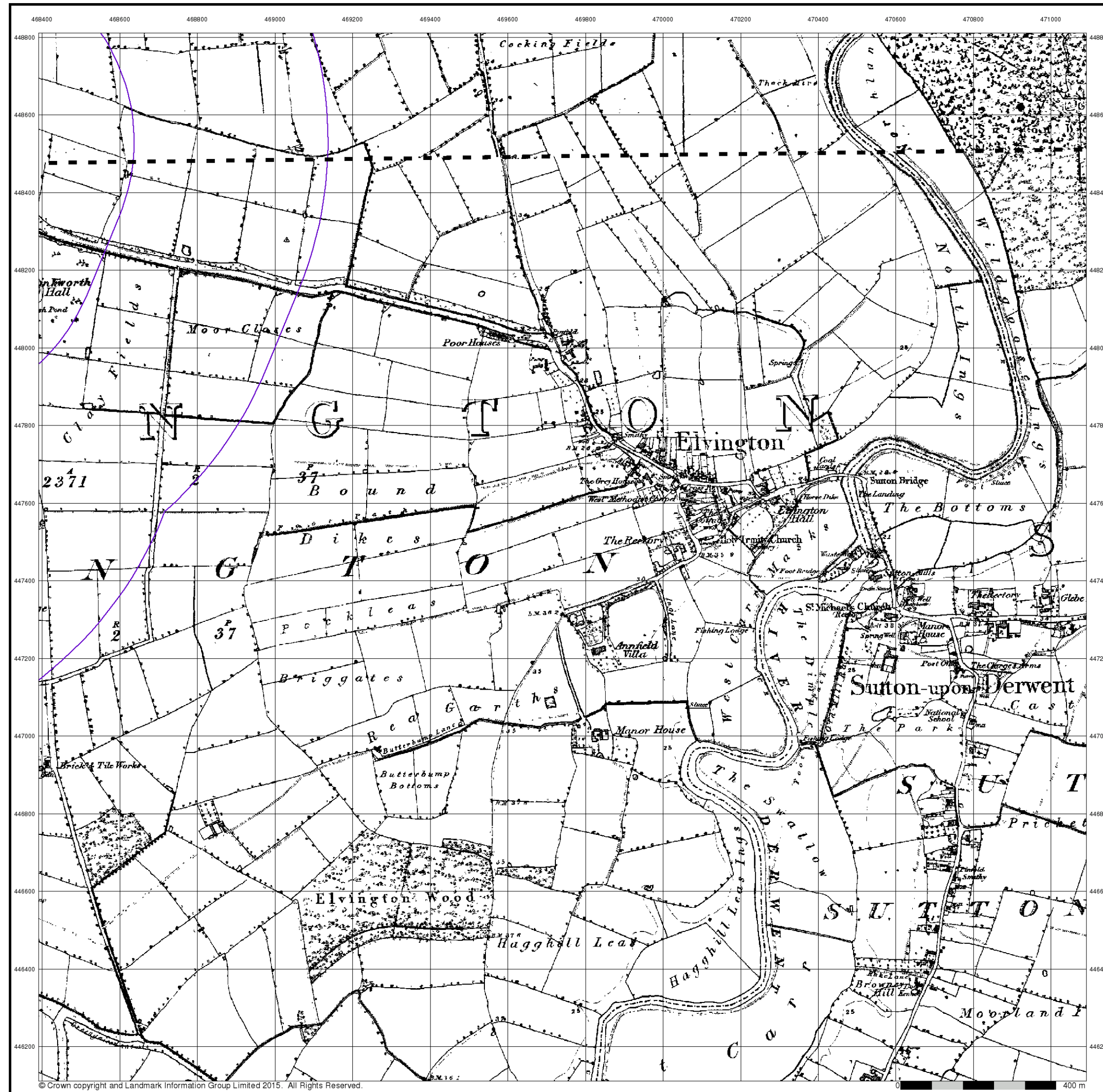
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468700, 448170
 Slice: C
 Site Area (Ha): 246.75
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Site Details

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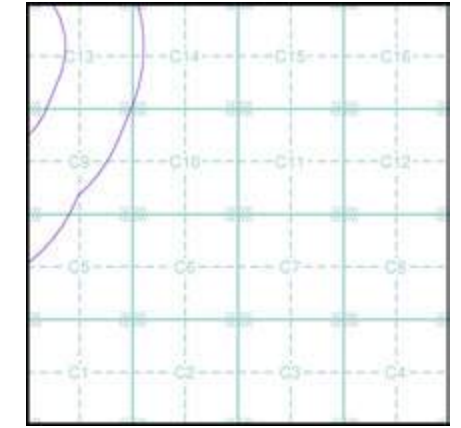
Yorkshire
Published 1854
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

17500	1854	1:10,560
19200	1854	1:10,560

Historical Map - Slice C



Order Details

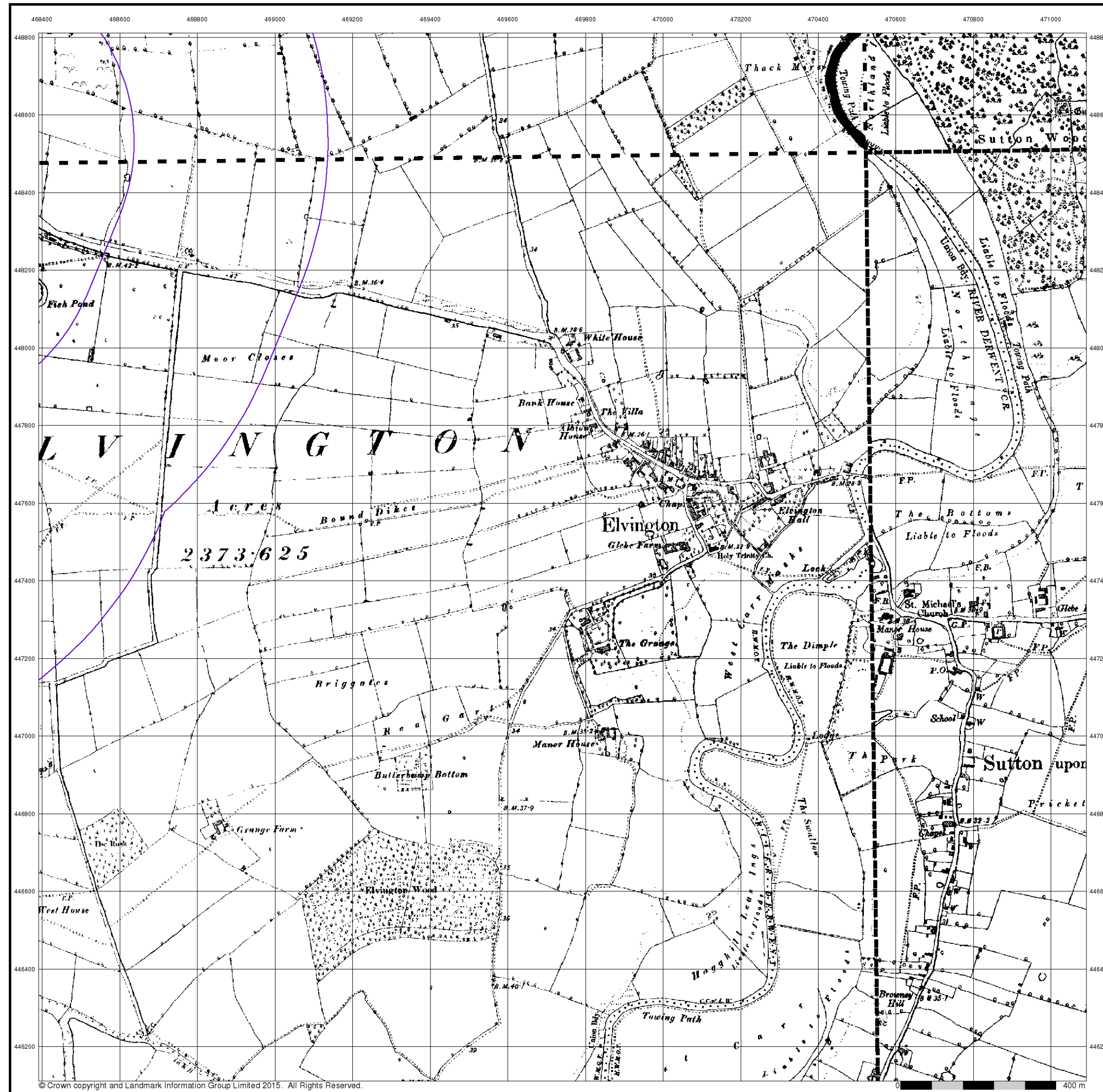
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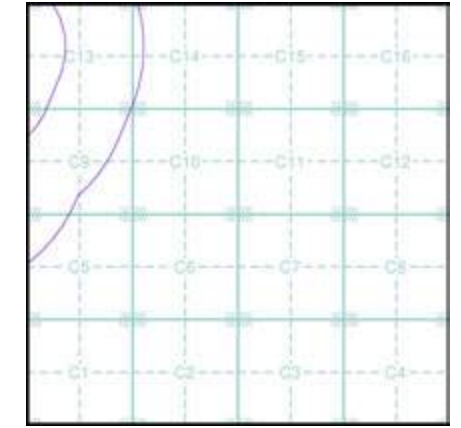
Yorkshire
Published 1893 - 1894
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

175SW 1893 1:10,560	175SE 1894 1:10,560
192NW 1893 1:10,560	192NE 1893 1:10,560

Historical Map - Slice C



Order Details

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Yorkshire

Published 1911

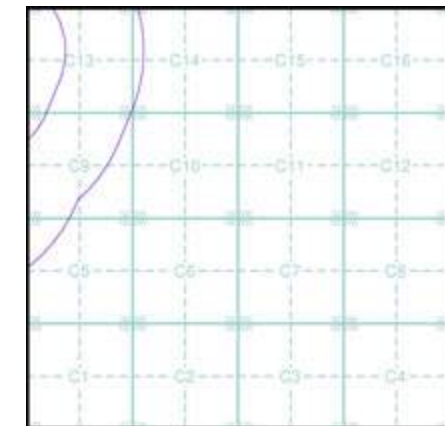
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

175SW 1911 1:10,560	175SE 1911 1:10,560
192NW 1911 1:10,560	192NE 1911 1:10,560

Historical Map - Slice C



Order Details

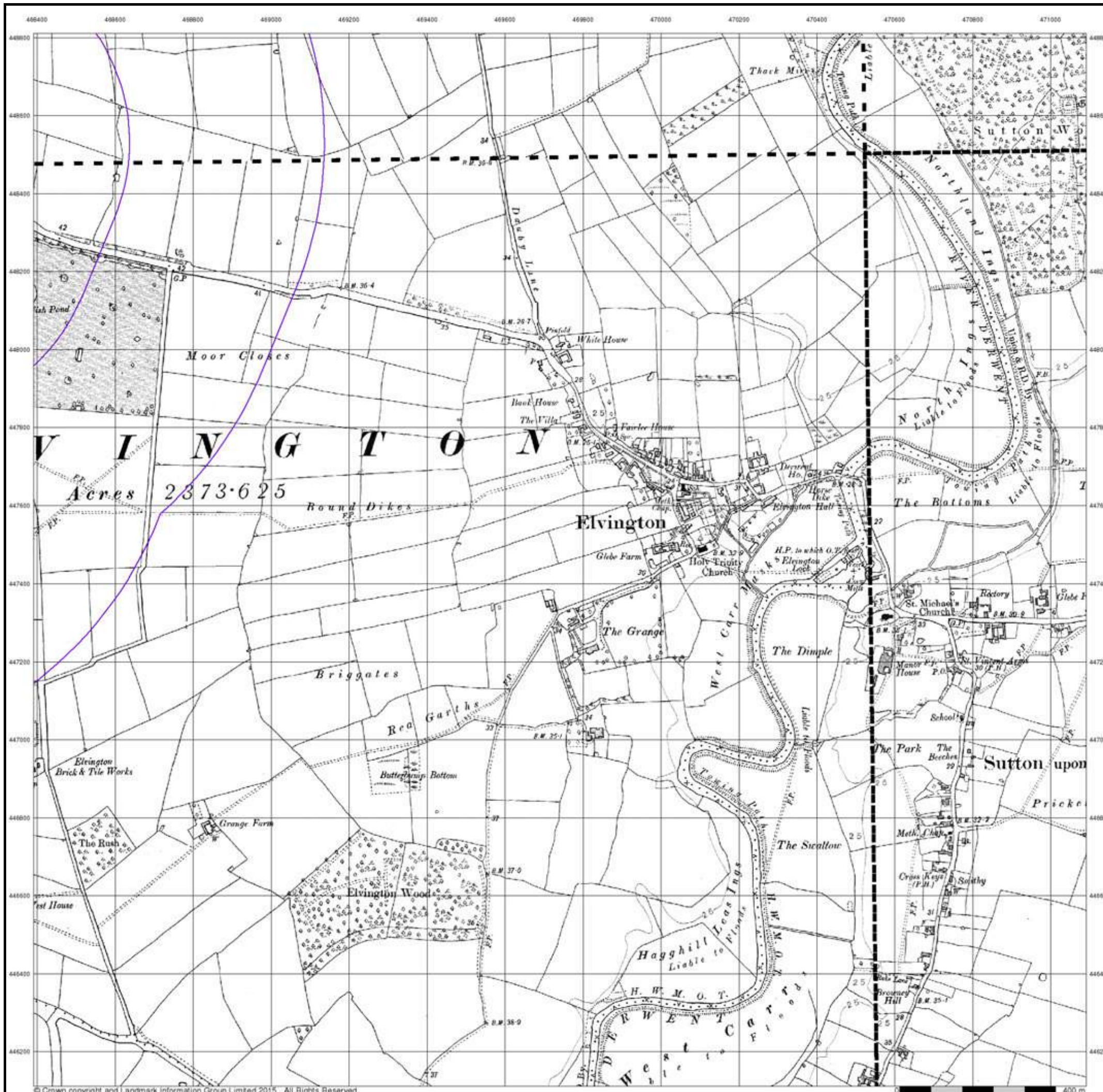
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468700, 448170
 Slice: C
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



Tel: 0844 844 9952
 Fax: 0844 844 9951
 Web: www.envirocheck.co.uk



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Yorkshire

Published 1952 - 1953

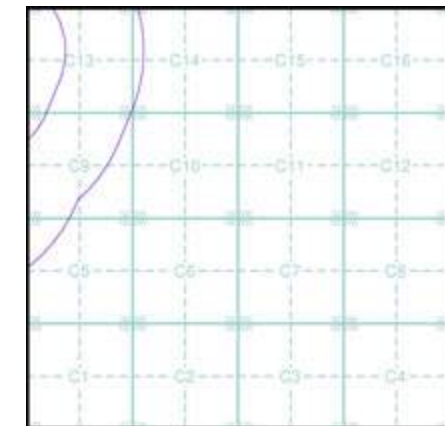
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

175SW 1953 1:10,560	175SE 1953 1:10,560
192NW 1952 1:10,560	192NE 1953 1:10,560

Historical Map - Slice C



Order Details

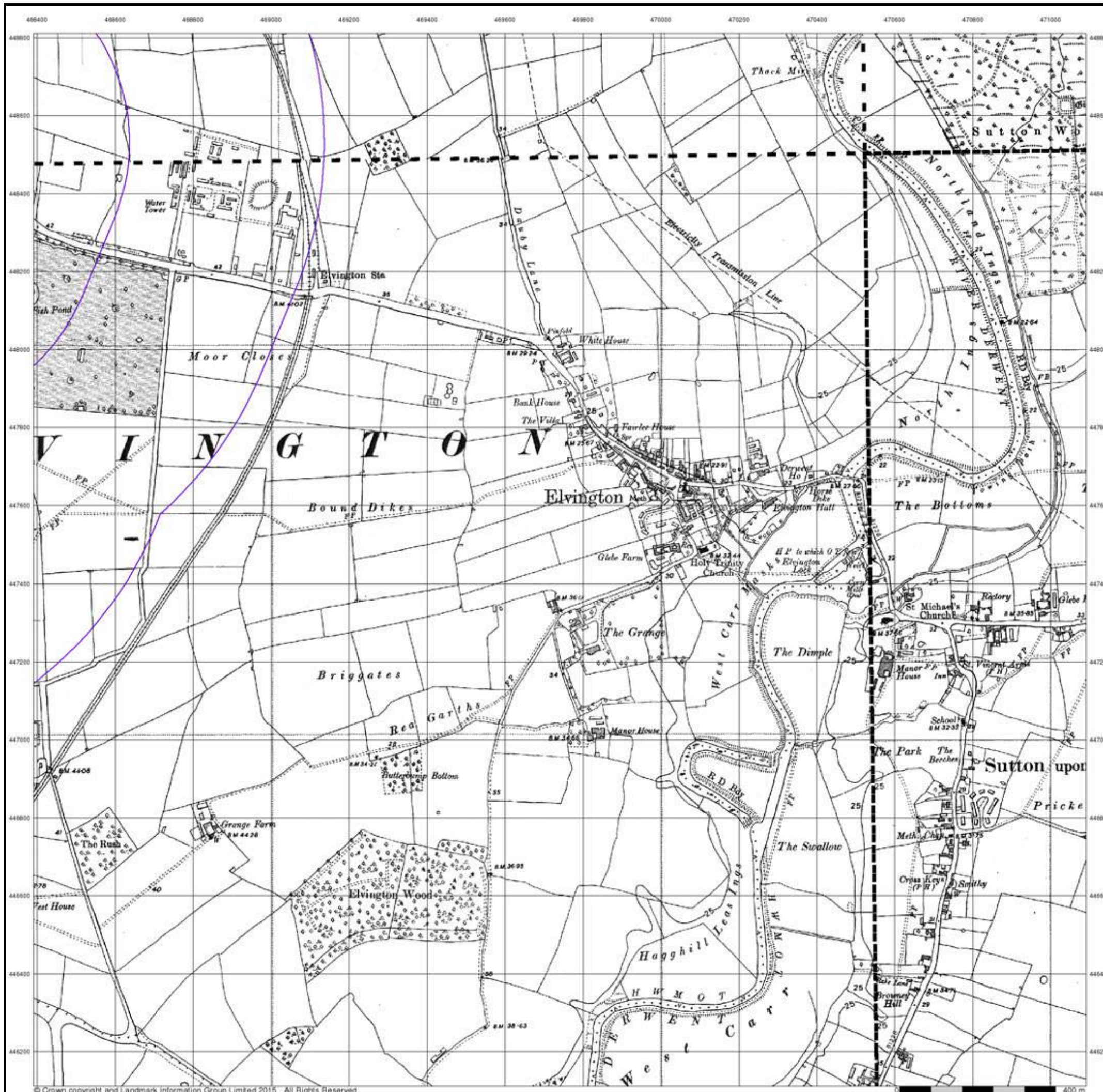
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468700, 448170
 Slice: C
 Site Area (Ha): 246.75
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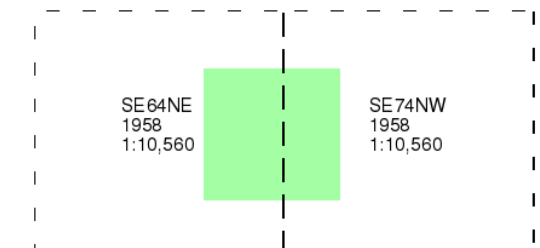
Ordnance Survey Plan

Published 1958

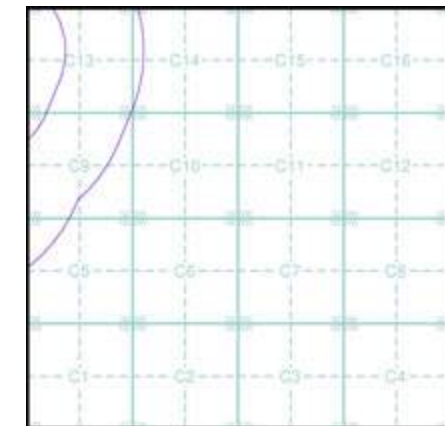
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice C



Order Details

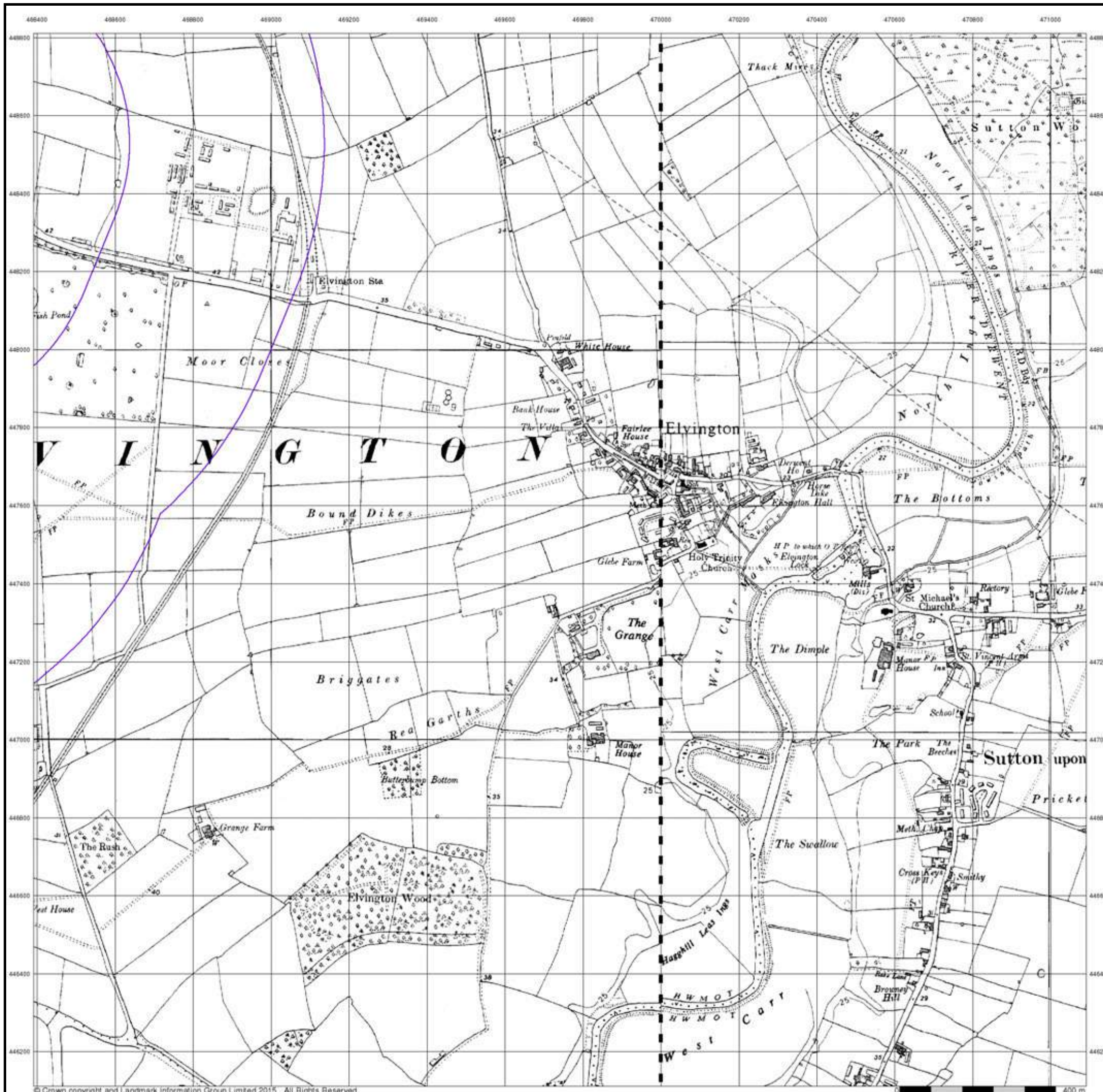
Order Number: 95641417_1_1
Customer Ref: 70011808-701
National Grid Reference: 468700, 448170
Slice: C
Site Area (Ha): 246.75
Search Buffer (m): 1000

Site Details

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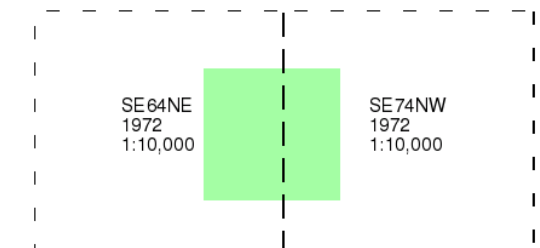
Ordnance Survey Plan

Published 1972

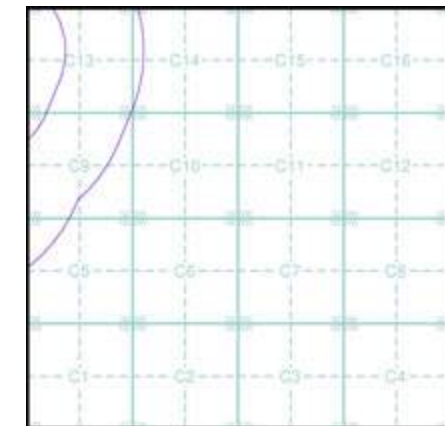
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice C



Order Details

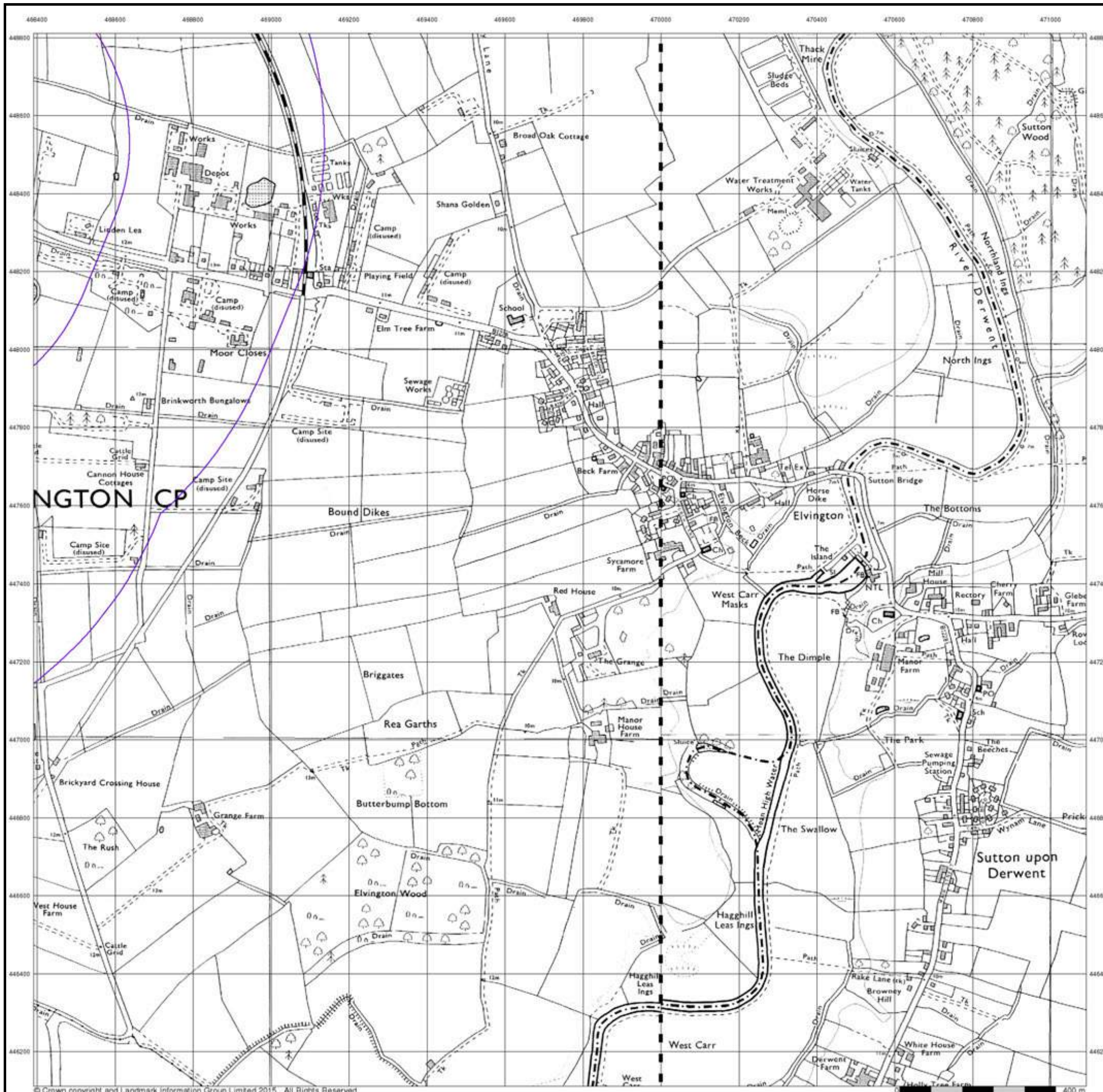
Order Number: 95641417_1_1
Customer Ref: 70011808-701
National Grid Reference: 468700, 448170
Slice: C
Site Area (Ha): 246.75
Search Buffer (m): 1000

Site Details

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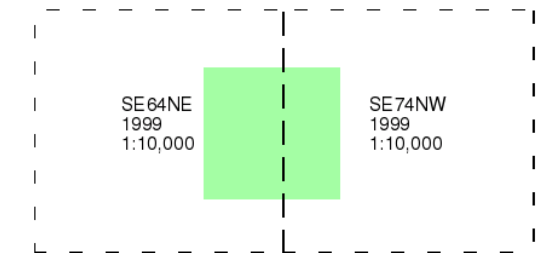
10k Raster Mapping

Published 1999

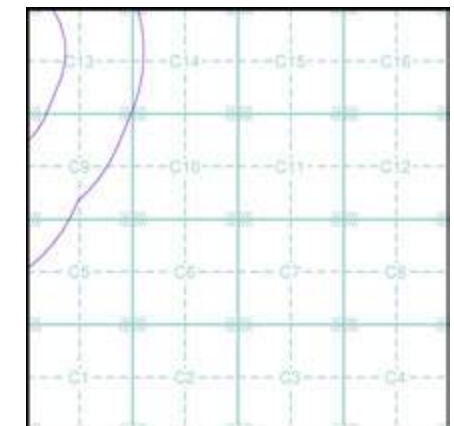
Source map scale - 1:10,000

The historical maps shown were produced from the Ordnance Survey's 1:10,000 colour raster mapping. These maps are derived from Landplan which replaced the old 1:10,000 maps originally published in 1970. The data is highly detailed showing buildings, fences and field boundaries as well as all roads, tracks and paths. Road names are also included together with the relevant road number and classification. Boundary information depiction includes county, unitary authority, district, civil parish and constituency.

Map Name(s) and Date(s)



Historical Map - Slice C



Order Details

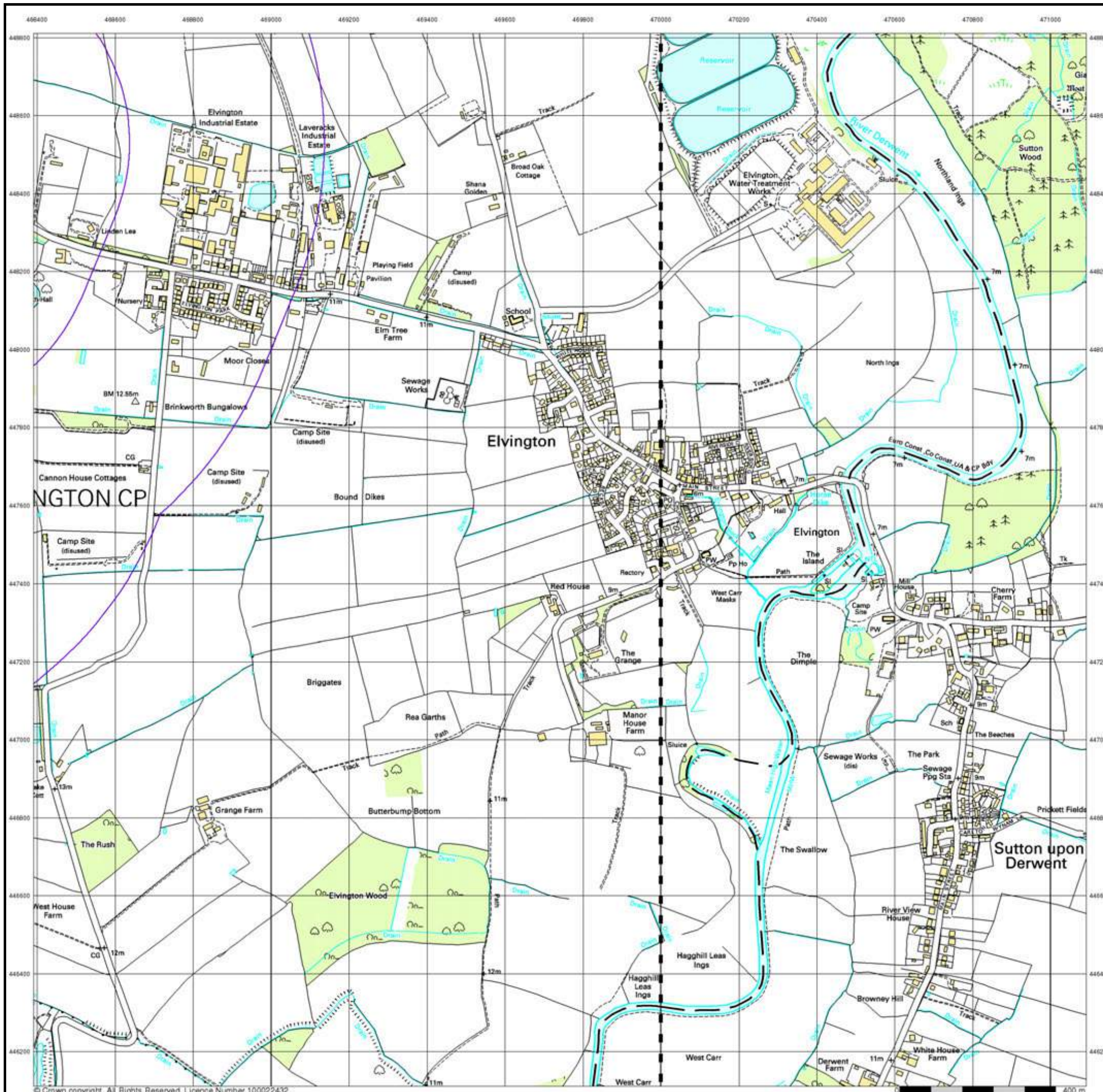
Order Number: 95641417_1_1
Customer Ref: 70011808-701
National Grid Reference: 468700, 448170
Slice: C
Site Area (Ha): 246.75
Search Buffer (m): 1000

Site Details

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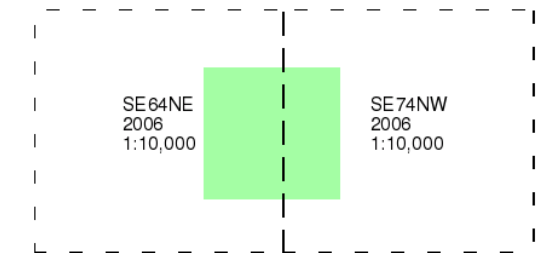
10k Raster Mapping

Published 2006

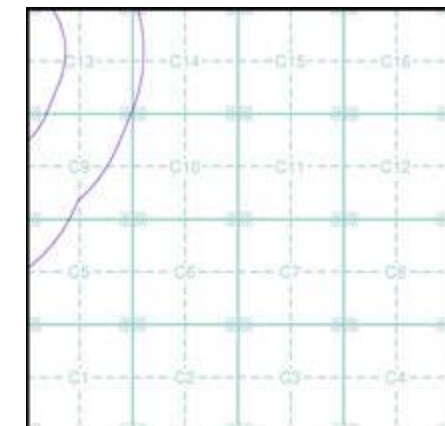
Source map scale - 1:10,000

The historical maps shown were produced from the Ordnance Survey's 1:10,000 colour raster mapping. These maps are derived from Landplan which replaced the old 1:10,000 maps originally published in 1970. The data is highly detailed showing buildings, fences and field boundaries as well as all roads, tracks and paths. Road names are also included together with the relevant road number and classification. Boundary information depiction includes county, unitary authority, district, civil parish and constituency.

Map Name(s) and Date(s)



Historical Map - Slice C



Order Details

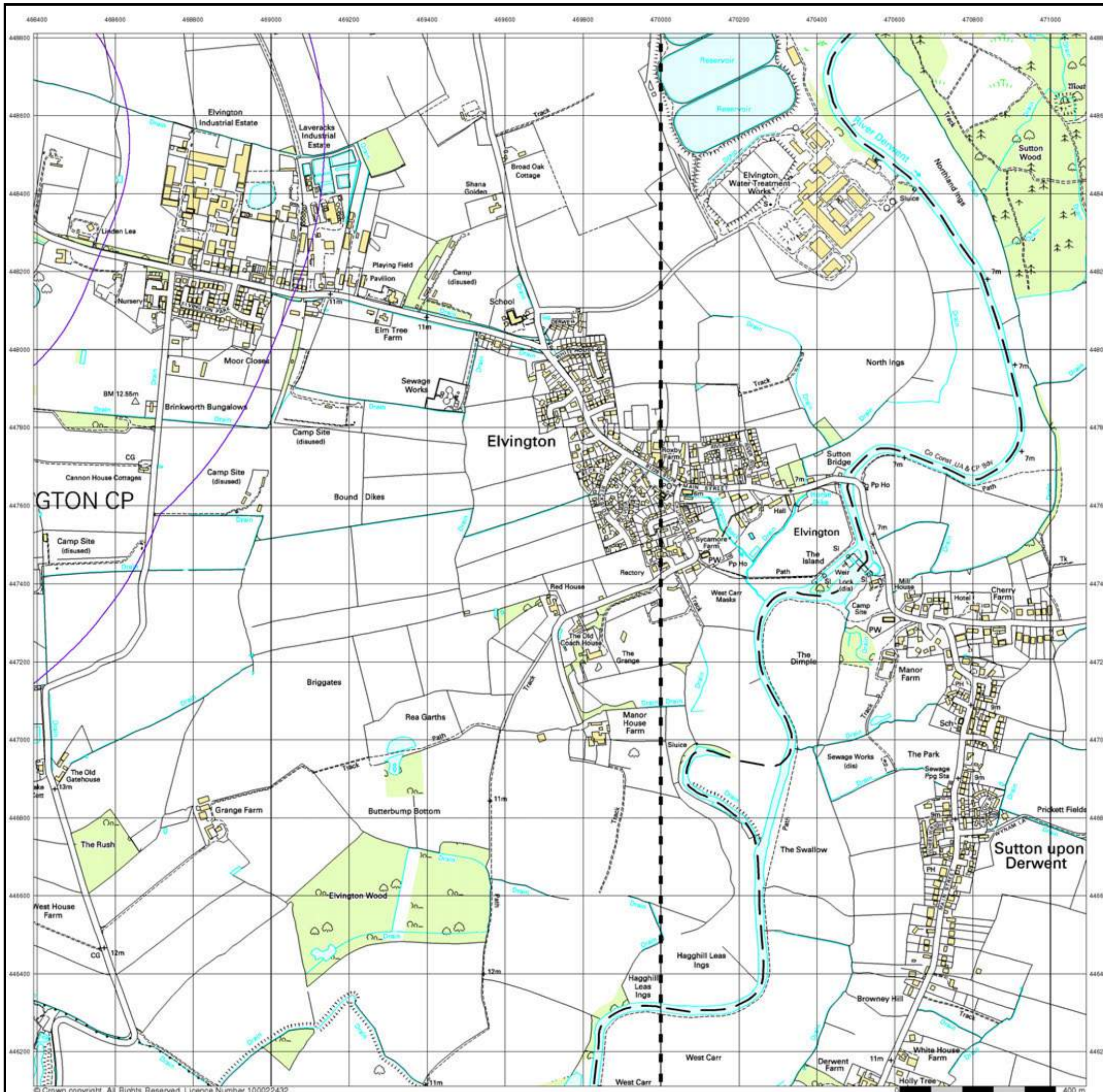
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Customer Ref: 70011808-701
National Grid Reference: 468700, 448170
Slice: C
Site Area (Ha): 246.75
Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



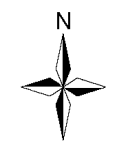
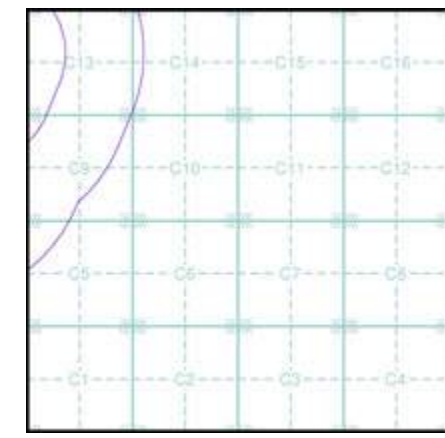
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Fax: 0844 844 9951
Web: www.envirocheck.co.uk





- General**
- Specified Site
 - Specified Buffer(s)
 - Bearing Reference Point
 - Map ID
 - Several of Type at Location
- Agency and Hydrological**
- Contaminated Land Register Entry or Notice (Location)
 - Contaminated Land Register Entry or Notice
 - Discharge Consent
 - Enforcement or Prohibition Notice
 - Integrated Pollution Control
 - Integrated Pollution Prevention Control
 - Local Authority Integrated Pollution Prevention and Control
 - Local Authority Pollution Prevention and Control
 - Local Authority Pollution Prevention and Control Enforcement
 - Pollution Incident to Controlled Waters
 - Prosecution Relating to Authorised Processes
 - Prosecution Relating to Controlled Waters
 - Registered Radioactive Substance
 - River Network or Water Feature
 - River Quality Sampling Point
 - Substantiated Pollution Incident Register
 - Water Abstraction
 - Water Industry Act Referral
- Waste**
- BGS Recorded Landfill Site (Location)
 - BGS Recorded Landfill Site
 - EA Historic Landfill (Buffered Point)
 - EA Historic Landfill (Polygon)
 - Integrated Pollution Control Registered Waste Site
 - Licensed Waste Management Facility (Landfill Boundary)
 - Licensed Waste Management Facility (Location)
 - Local Authority Recorded Landfill Site (Location)
 - Local Authority Recorded Landfill Site
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Water)
 - Potentially Infilled Land (Water)
 - Potentially Infilled Land (Water)
 - Registered Landfill Site
 - Registered Landfill Site (Point Buffered to 100m)
 - Registered Landfill Site (Point Buffered to 250m)
 - Registered Waste Transfer Site (Location)
 - Registered Waste Transfer Site
 - Registered Waste Treatment or Disposal Site (Location)
 - Registered Waste Treatment or Disposal Site
- Hazardous Substances**
- COMAH Site
 - Explosive Site
 - NIHS Site
 - Planning Hazardous Substance Consent
 - Planning Hazardous Substance Enforcement
- Geological**
- BGS Recorded Mineral Site

Site Sensitivity Map - Slice C



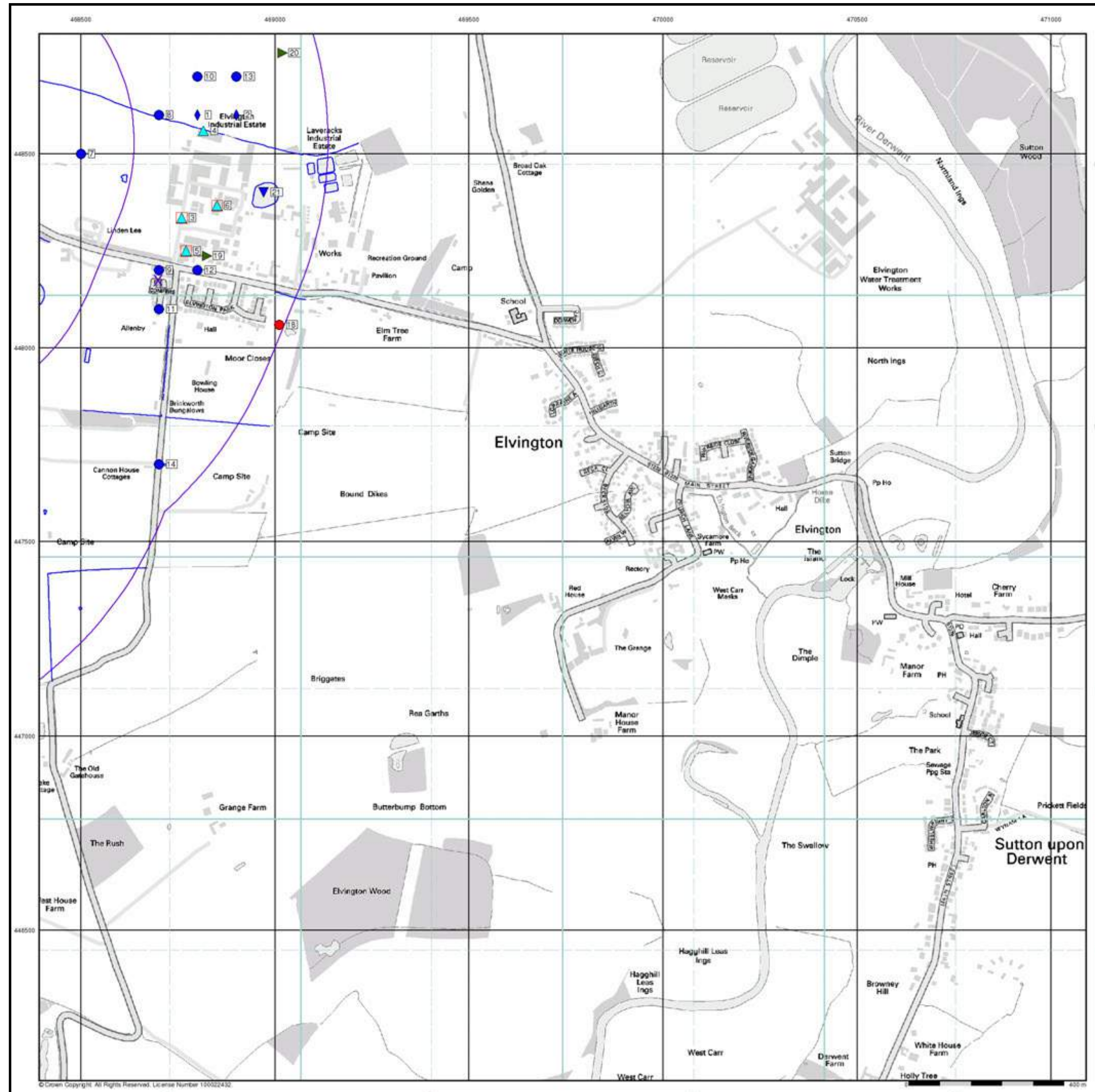
Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468700, 448170
 Slice: C
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU

Landmark Information Group
 Tel: 0844 844 9952
 Fax: 0844 844 9951
 Web: www.envirocheck.co.uk



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Industrial Land Use Map

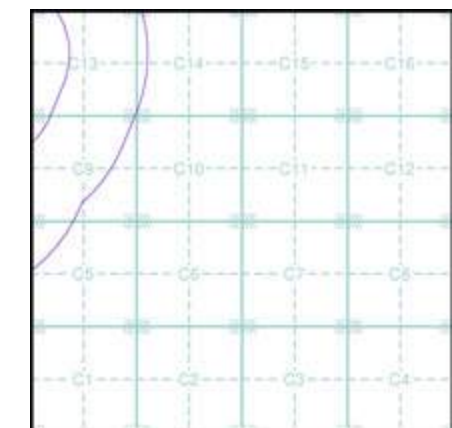
General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point
- Slice
- Map ID

Industrial Land Use

- Contemporary Trade Directory Entry
- Fuel Station Entry
- Gas Pipeline
- Points of Interest - Commercial Services
- Points of Interest - Education and Health
- Points of Interest - Manufacturing and Production
- Points of Interest - Public Infrastructure
- Points of Interest - Recreational and Environmental
- Underground Electrical Cables

Industrial Land Use Map - Slice C



Order Details

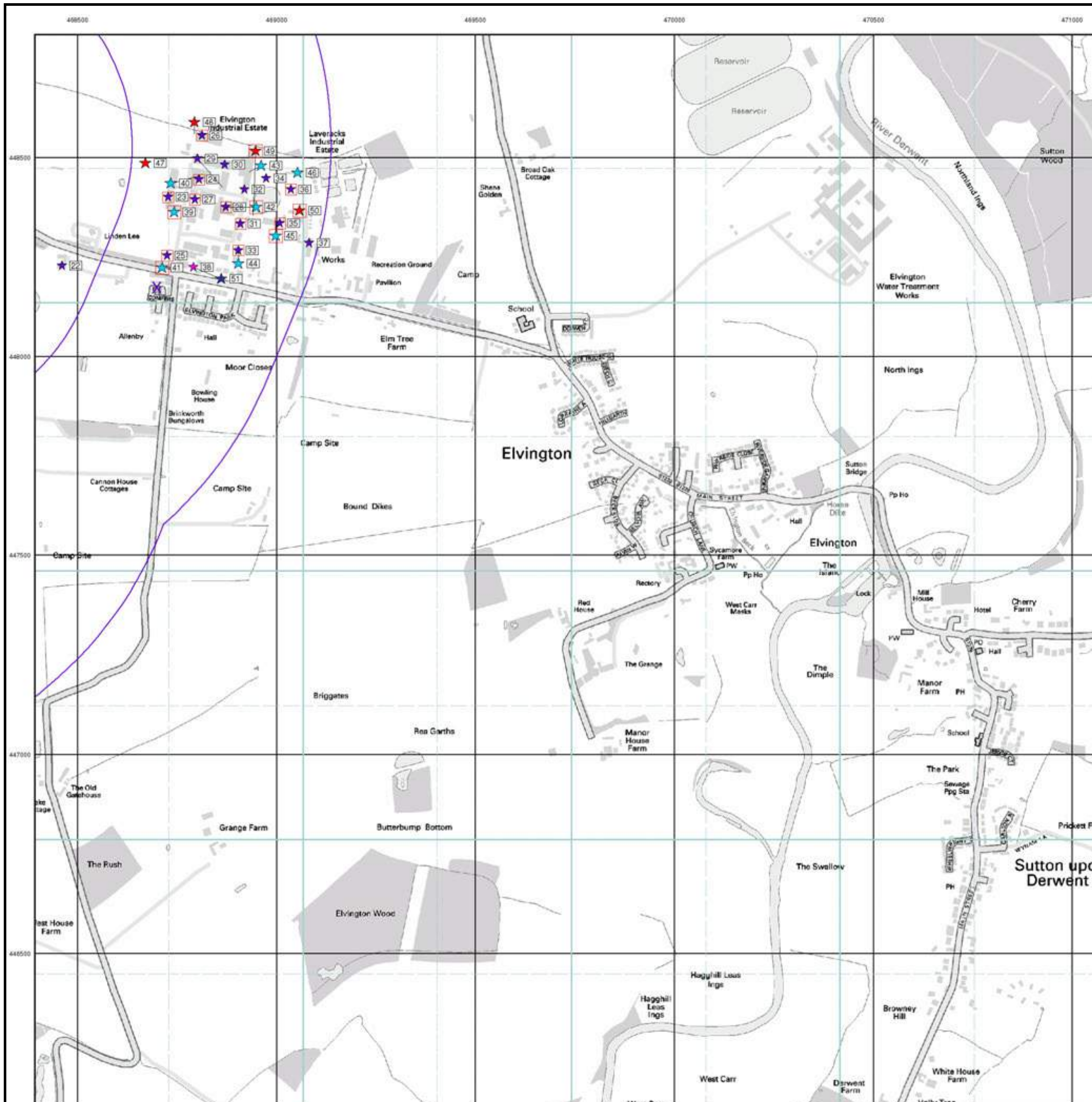
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 Search Buffer (m): 1000

Site Details




Site off Elvington Lane, York, YO41 4AU








Tel: 0844 844 9952
 Fax: 0844 844 9951
 Web: www.envirocheck.co.uk



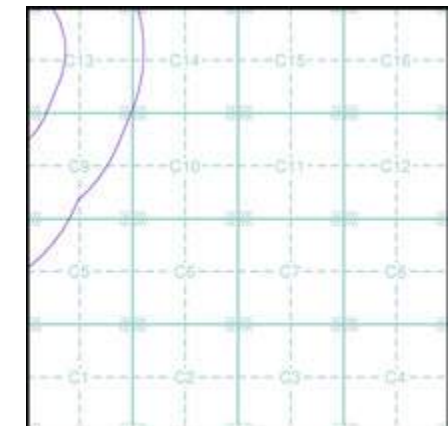
General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point

Agency and Hydrological (Flood)

-  Extreme Flooding from Rivers or Sea without Defences (Zone 2)
-  Flooding from Rivers or Sea without Defences (Zone 3)
-  Area Benefiting from Flood Defence
-  Flood Water Storage Areas
-  Flood Defence

Flood Map - Slice C

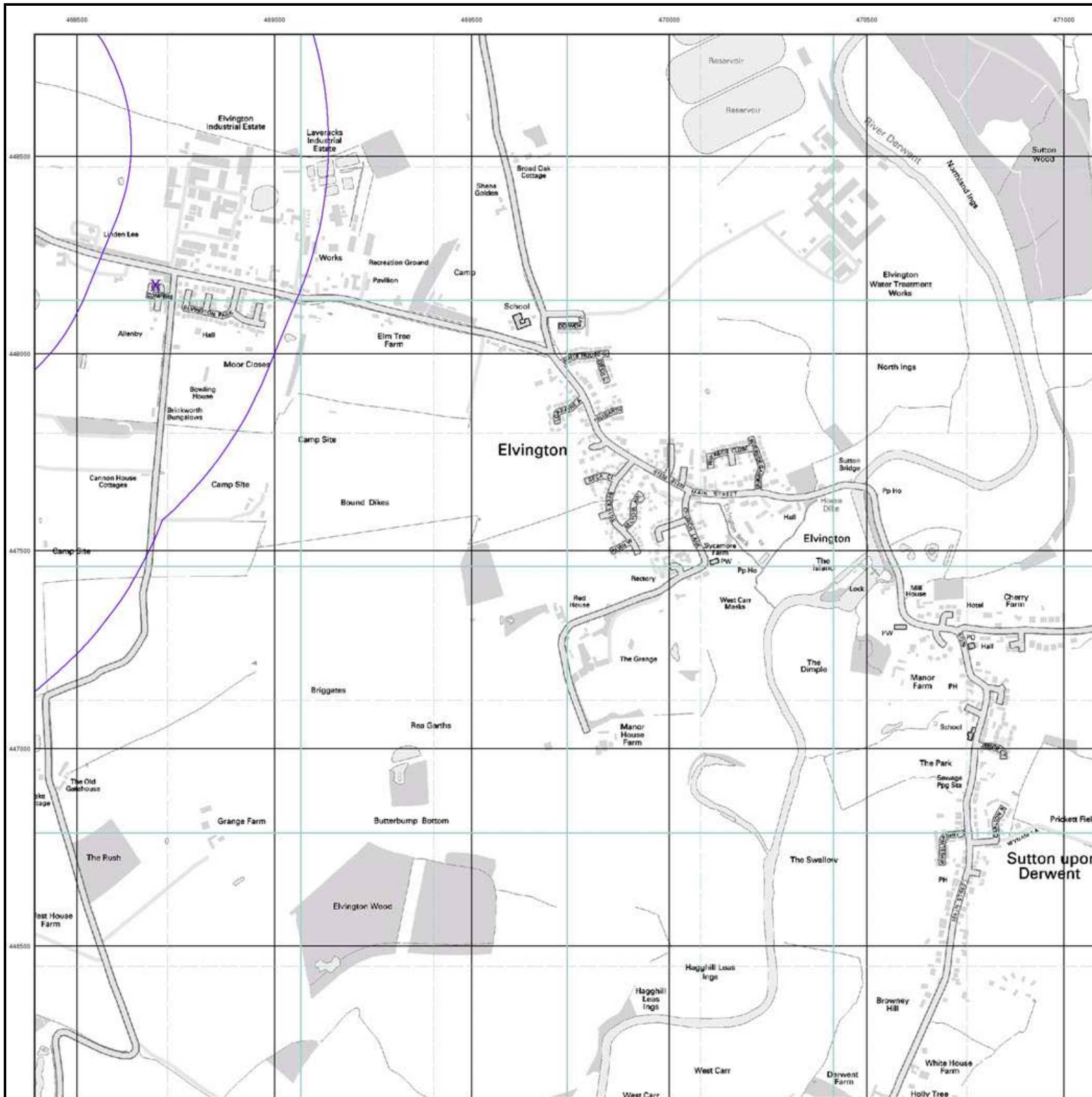


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

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468700, 448170
 Slice: C
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details






Site off Elvington Lane, York, YO41 4AU



General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point
-  Map ID
-  Several of Type at Location

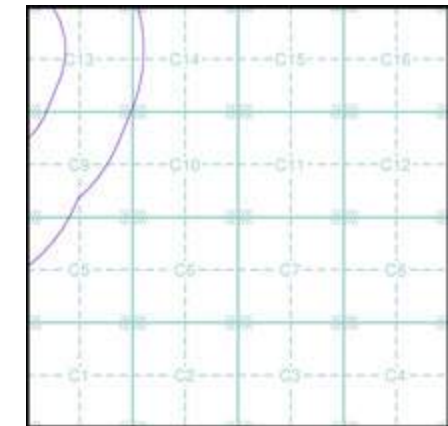
Agency and Hydrological (Boreholes)

-  BGS Borehole Depth 0 - 10m
-  BGS Borehole Depth 10 - 30m
-  BGS Borehole Depth 30m +
-  Confidential
-  Other

For Borehole information please refer to the Borehole .csv file which accompanied this slice.

A copy of the BGS Borehole Ordering Form is available to download from the Support section of www.envirocheck.co.uk.

Borehole Map - Slice C

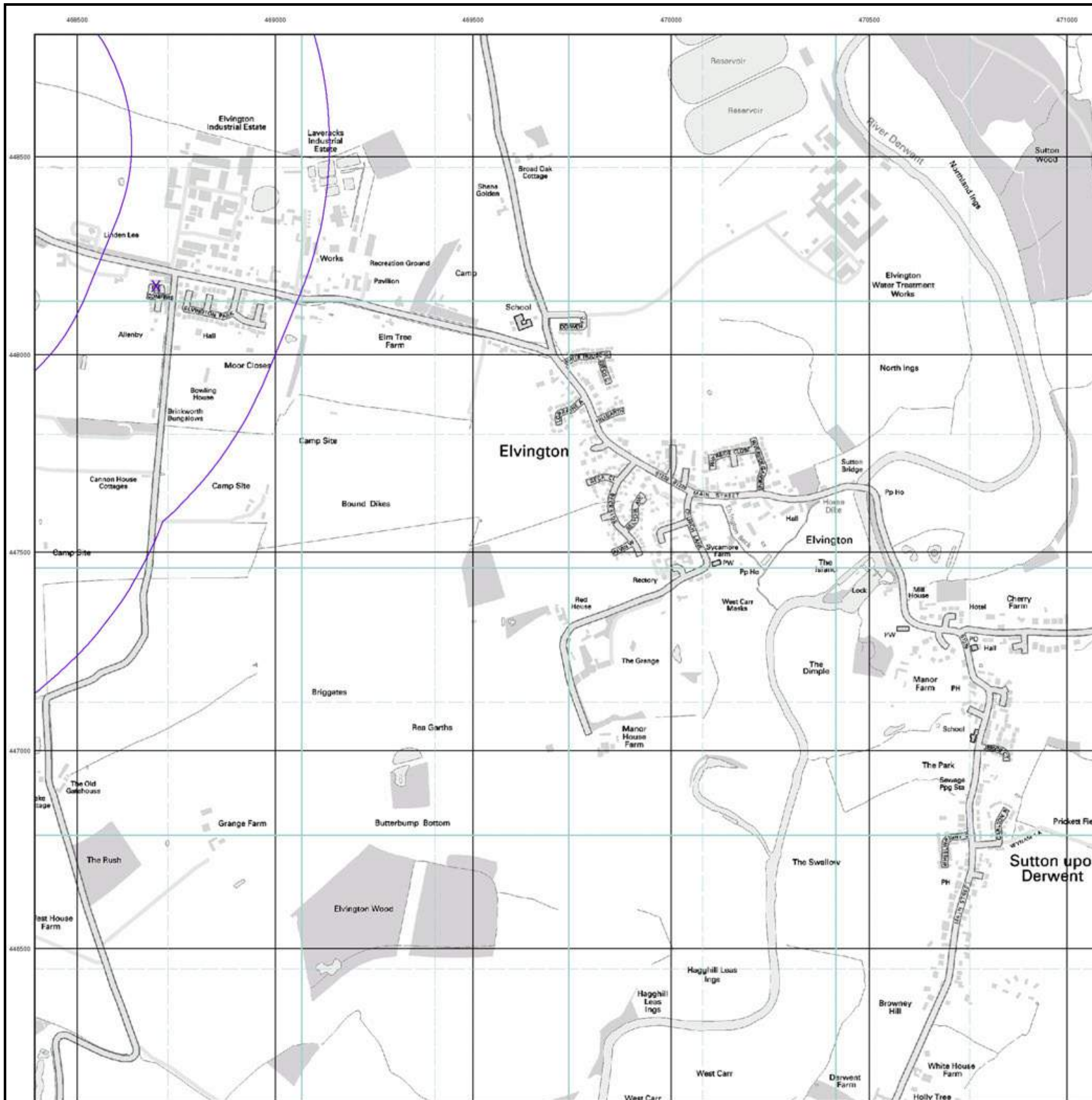


Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468700, 448170
 Slice: C
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU





General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point
- Map ID

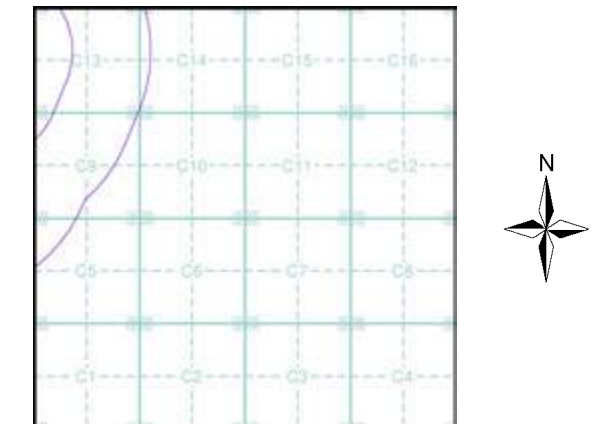
Detailed River Network Data

- Primary River
- Secondary River
- Tertiary River
- Canal
- Canal Tunnel
- Undefined River
- Lake/Reservoir
- Offline Drainage Feature
- Extended Culvert (greater than 50m)
- Underground River (inferred)
- Underground River (local knowledge)
- Downstream of High Water Mark
- Downstream of Seaward Extension
- Not assigned River feature

Contours (height in metres)

- Standard Contour 105
- Master Contour 100
- Spot Height 167.3
- MLW - Mean Low Water
- MHW - Mean High Water

E/NRW Detailed River Network Map - Slice C



Order Details

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 Customer Ref: 70011808-701
 National Grid Reference: 468700, 448170
 Slice: C
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 Search Buffer (m): 1000

Site Details




Site off Elvington Lane, York, YO41 4AU



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 Fax: 0844 844 9951
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General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point

Risk of Flooding from Surface Water

-  High - 30 Year Return
-  Medium - 100 Year Return
-  Low - 1000 Year Return

Suitability

- See the suitability map below
-  National to county
 -  County to town
 -  Town to street
 -  Street to parcels of land
 -  Property

EANRW Suitability Map - Slice C

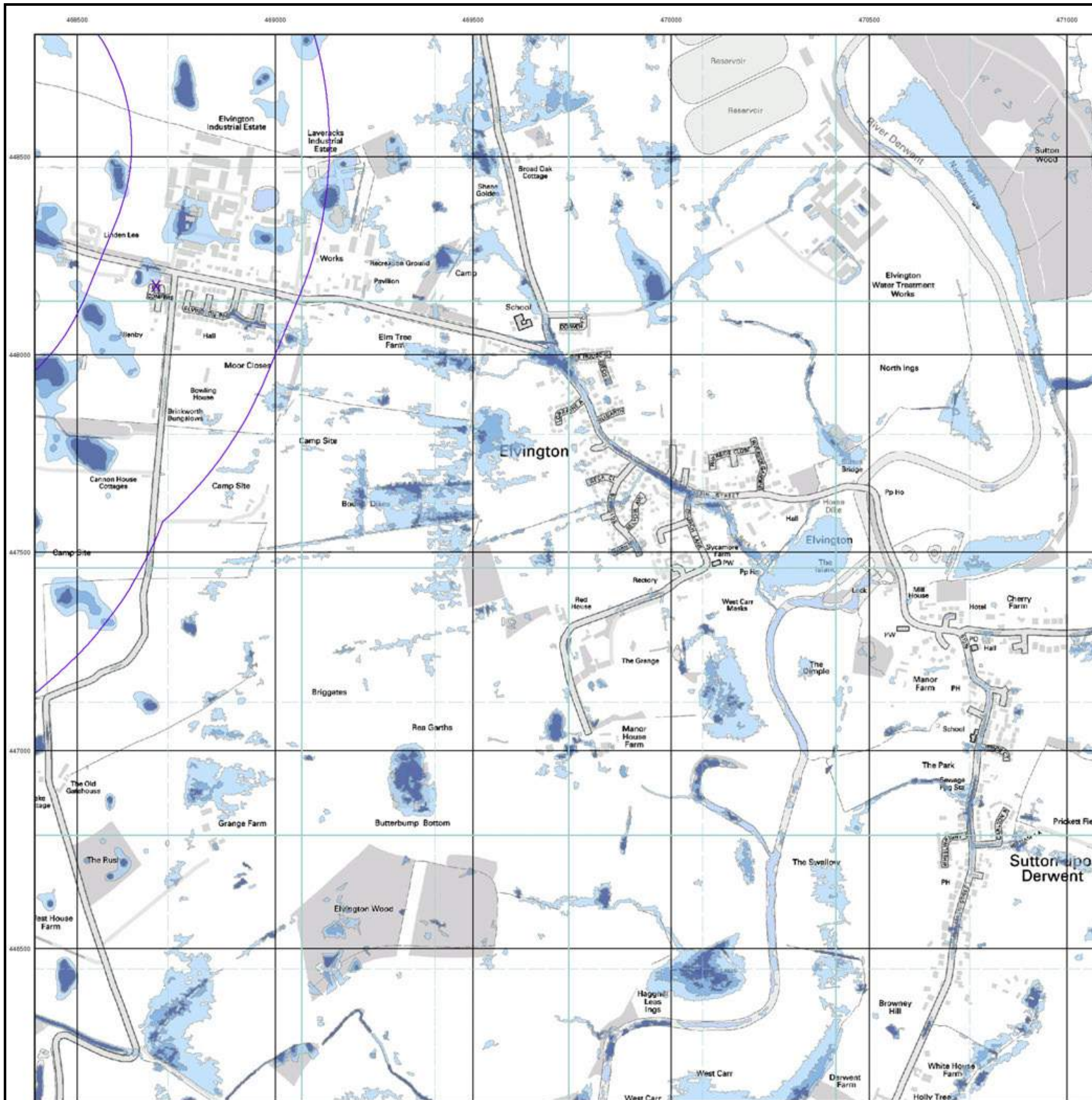


Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468700, 448170
 Slice: C
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



Historical Mapping Legends

Ordnance Survey County Series 1:10,560

- Gravel Pit
- Sand Pit
- Other Pits
- Quarry
- Shingle
- Orchard
- Osiers
- Reeds
- Marsh
- Mixed Wood
- Deciduous
- Brushwood
- Fir
- Furze
- Rough Pasture
- Arrow denotes flow of water
- Trigonometrical Station
- Site of Antiquities
- Bench Mark
- Pump, Guide Post, Signal Post
- Well, Spring, Boundary Post
- 285** Surface Level
- Sketched Contour
- Instrumental Contour
- Main Roads
- Minor Roads
- Sunken Road
- Raised Road
- Road over Railway
- Railway over River
- Railway over Road
- Level Crossing
- Road over River or Canal
- Road over Stream
- Road over Stream
- County Boundary (Geographical)
- County & Civil Parish Boundary
- Administrative County & Civil Parish Boundary
- County Borough Boundary (England)
- County Burgh Boundary (Scotland)
- Rural District Boundary
- Civil Parish Boundary

Ordnance Survey Plan 1:10,000

- Chalk Pit, Clay Pit or Quarry
- Gravel Pit
- Sand Pit
- Disused Pit or Quarry
- Refuse or Slag Heap
- Lake, Loch or Pond
- Dunes
- Boulders
- Coniferous Trees
- Non-Coniferous Trees
- Orchard
- Scrub
- Coppice
- Bracken
- Heath
- Rough Grassland
- Marsh
- Reeds
- Saltings
- Building
- Glasshouse
- Sloping Masonry
- Pylon
- Electricity Transmission Line
- Pole
- Cutting
- Embankment
- Standard Gauge Multiple Track
- Standard Gauge Single Track
- Siding, Tramway or Mineral Line
- Narrow Gauge
- Geographical County
- Administrative County, County Borough or County of City
- Municipal Borough, Urban or Rural District, Burgh or District Council
- Borough, Burgh or County Constituency
- Civil Parish
- BP, BS Boundary Post or Stone
- Ch Church
- CH Club House
- F E Sta Fire Engine Station
- FB Foot Bridge
- Fn Fountain
- GP Guide Post
- MP Mile Post
- MS Mile Stone
- Pol Sta Police Station
- PO Post Office
- PC Public Convenience
- PH Public House
- SB Signal Box
- Spr Spring
- TCB Telephone Call Box
- TCP Telephone Call Post
- W Well

1:10,000 Raster Mapping

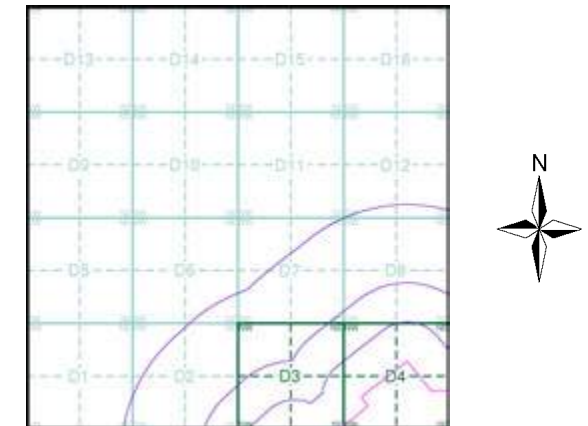
- Gravel Pit
- Rock
- Boulders
- Shingle
- Sand
- Slopes
- Refuse tip or slag heap
- Rock (scattered)
- Boulders (scattered)
- Mud
- Sand Pit
- Top of cliff
- General detail
- Underground detail
- Overhead detail
- Narrow gauge railway
- Multi-track railway
- Single track railway
- County boundary (England only)
- Civil, parish or community boundary
- District, Unitary, Metropolitan, London Borough boundary
- Constituency boundary
- Area of wooded vegetation
- Non-coniferous trees
- Non-coniferous trees (scattered)
- Coniferous trees
- Coniferous trees (scattered)
- Positioned tree
- Orchard
- Coppice or Osiers
- Rough Grassland
- Heath
- Scrub
- Marsh, Salt Marsh or Reeds
- Water feature
- Flow arrows
- MHW(S) Mean high water (springs)
- MLW(S) Mean low water (springs)
- Telephone line (where shown)
- Electricity transmission line (with poles)
- Bench mark (where shown)
- Triangulation station
- Point feature (e.g. Guide Post or Mile Stone)
- Pylon, flare stack or lighting tower
- Site of (antiquity)
- Glasshouse
- General Building
- Important Building



Historical Mapping & Photography included:

Mapping Type	Scale	Date	Pg
Yorkshire	1:10,560	1853 - 1854	3
Yorkshire	1:10,560	1893	4
Yorkshire	1:10,560	1910 - 1911	5
Yorkshire	1:10,560	1931	6
Yorkshire	1:10,560	1938 - 1953	7
Yorkshire	1:10,560	1938	8
Yorkshire	1:10,560	1953	9
Ordnance Survey Plan	1:10,000	1958	10
Ordnance Survey Plan	1:10,000	1970 - 1972	11
York	1:10,000	1980	12
Ordnance Survey Plan	1:10,000	1981 - 1984	13
Ordnance Survey Plan	1:10,000	1988	14
Ordnance Survey Plan	1:10,000	1992	15
10K Raster Mapping	1:10,000	1999	16
10K Raster Mapping	1:10,000	2006	17
VectorMap Local	1:10,000	2016	18

Historical Map - Slice D



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 464860, 449390
 Slice: D
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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 Fax: 0844 844 9951
 Web: www.envirocheck.co.uk

Russian Military Mapping Legends

1:5,000 and 1:10,000 mapping

a. Not drawn to scale b. Drawn to scale

- Government and Administrative Buildings
- Military and Industrial Buildings
- Military and Communication Areas
- Subway Entrance
- Fireproof Building
- Prominent Fireproof Building
- Non-fireproof Building
- Non-fireproof Building (non-dwelling)
- Factory, mill, and flour mill, with chimneys
- Factory, mill, and flour mill, without chimneys
- Power Station, drawn to scale
- Hydroelectric Power Station
- Radio Station, drawn to scale
- Telephone Station, drawn to scale
- Abandoned Open-pit Mine or Quarry
- Open-pit Salt Mine
- Pit
- Oil Deposit or Well
- Oil Seepage
- Tailings Pile
- Fuel Storage Tanks
- Natural Gas Tank
- Bench Mark
- Drill Hole
- Burial Mound
- Triangulation Point on Burial Mound
- Single-track Railroad
- Double-track Railroad and Station Building
- Coniferous Forest
- Deciduous Forest
- Mixed Forest
- Lawns
- Citrus Orchard
- Wet Ground
- Scattered Vegetation

243,8 Values for prominent elevations
 186,0 Numbers for spot elevations, depth soundings, contour lines, etc.
 0,2 Velocity of the current, width of river bed, depth of river
 Fractional terms: length and capacity of bridges; depth of fords and condition of the river bottom; height of forest and the diameter of trees

Russian Alphabet (For reference and phonetic interpretation of map text)

А а (A)	З з (Z)	П п (P)	Ч ч (CH)
Б б (B)	И и (I)	Р р (R)	Ш ш (SH)
В в (V)	Й й (Y)	С с (S)	Щ щ (SHCH)
Г г (G)	К к (K)	Т т (T)	Ъ (-)
Д д (D)	Л л (L)	У у (U)	Ы (Y)
Е е (E)	М м (M)	Ф ф (F)	Ь (')
Ё ё (YO)	Н н (N)	Х х (KH)	Э э (E)
Ж ж (ZH)	О о (O)	Ц ц (TS)	Ю ю (YU or IU)
			Я я (YA or IA)

1:25,000 mapping

a. Not drawn to scale b. Drawn to scale

- Government and Administrative Buildings
- Military and Industrial Buildings
- Military and Communication Areas
- Subway Entrance
- Partly Demolished Buildings
- Demolished Buildings
- Built-Up Area with Fireproof Buildings Predominant
- Built-Up Area with Non-Fireproof Buildings Predominant
- Individual Fireproof Building
- Prominent Industrial Building
- Individual Dwelling, Fireproof
- Ruins of an Individual Dwelling
- Factory or Mill Chimney
- Factory or Mill with Chimney
- Factory or Mill without Chimney
- Mine or Open Pit Mine
- Operating Shaft or Mine
- Non-Operating Shaft or Mine
- Salt Mine
- Tailings Pile
- Pit
- Stone Quarry
- Gas Pump or Service Station
- Fuel Storage or Natural Gas Tank
- Oil or Natural Gas Derrick
- Small Hydroelectric Power Station
- Power Station
- Transformer Station
- Cemetery
- Burial Mound (height in metres)
- Triangulation Point on Burial Mound
- Triangulation Point
- Bench Mark
- Bench Mark (monumented)
- Telegraph Office
- Telephone Station
- Radio Station
- Radio Tower
- Airfield or Seaplane Base
- Landing Strip
- Small Bridge
- Pipe (Culvert)
- Tunnel
- Dismantled Railroad
- Double-track Railroad with First Class Station
- Railroad Under Construction
- Shore Embankment
- River or Ditch with Embankment
- Water Reservoir or Rain Water Pit
- Spring
- Isobath with value
- Well
- Water Reservoir or Rain Water Pit
- Spring
- Isobath with value
- Heavy (Index) Contour Line
- Contour Line and Value
- Half Contour Line
- Spot Elevation Value
- Coniferous
- Deciduous
- Mixed
- Scrub

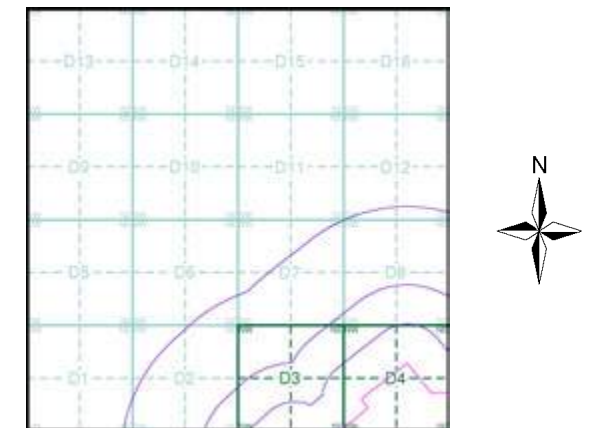
Key to Numbers on Mapping



Historical Mapping & Photography included:

Mapping Type	Scale	Date	Pg
Yorkshire	1:10,560	1853 - 1854	3
Yorkshire	1:10,560	1893	4
Yorkshire	1:10,560	1910 - 1911	5
Yorkshire	1:10,560	1931	6
Yorkshire	1:10,560	1938 - 1953	7
Yorkshire	1:10,560	1938	8
Yorkshire	1:10,560	1953	9
Ordnance Survey Plan	1:10,000	1958	10
Ordnance Survey Plan	1:10,000	1970 - 1972	11
York	1:10,000	1980	12
Ordnance Survey Plan	1:10,000	1981 - 1984	13
Ordnance Survey Plan	1:10,000	1988	14
Ordnance Survey Plan	1:10,000	1992	15
10K Raster Mapping	1:10,000	1999	16
10K Raster Mapping	1:10,000	2006	17
VectorMap Local	1:10,000	2016	18

Russian Map - Slice D



Order Details

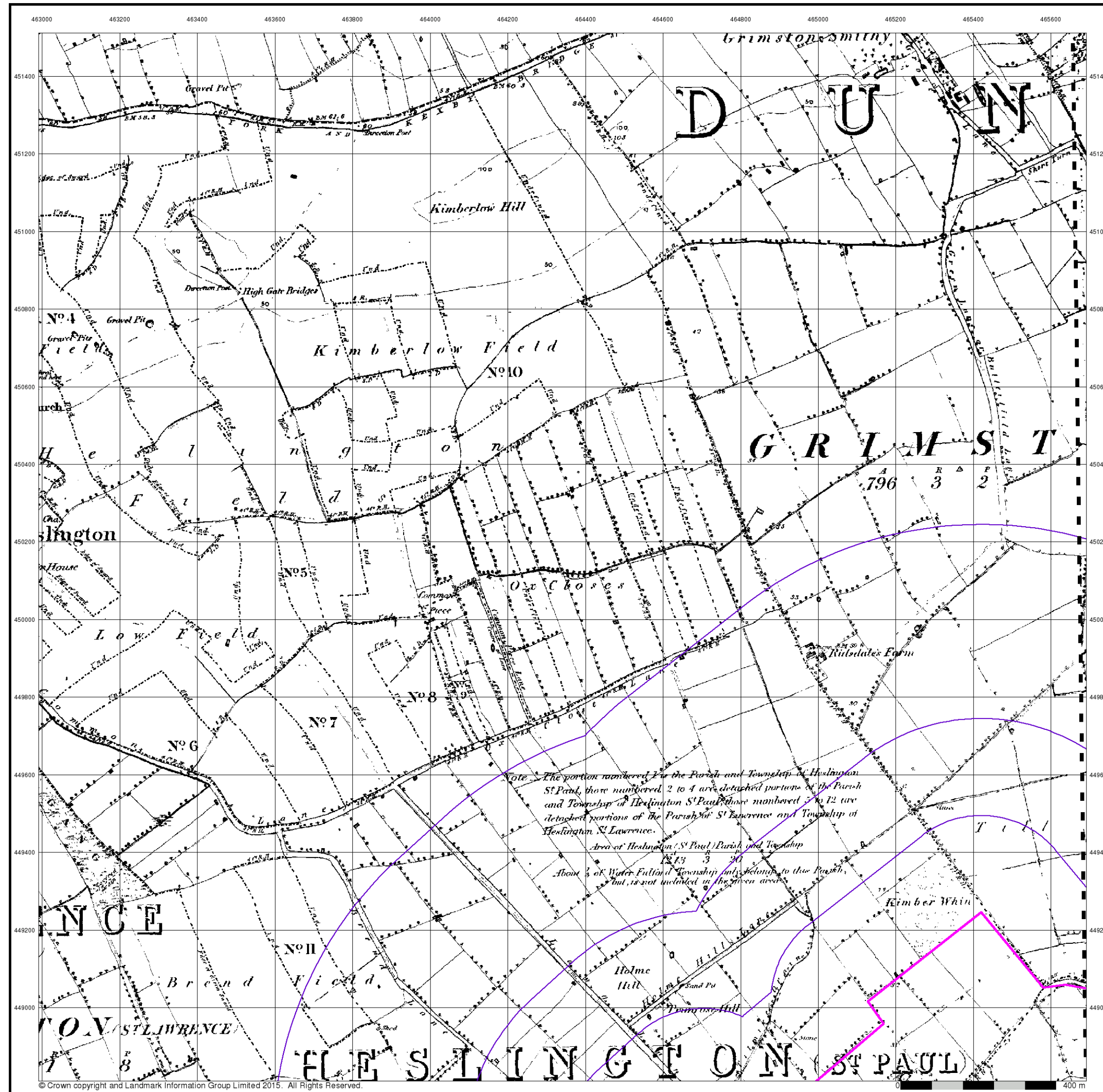
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 Customer Ref: 70011808-701
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 Slice: D
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



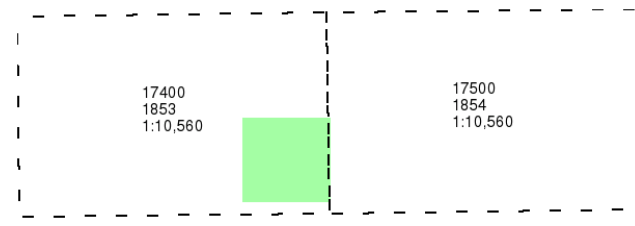
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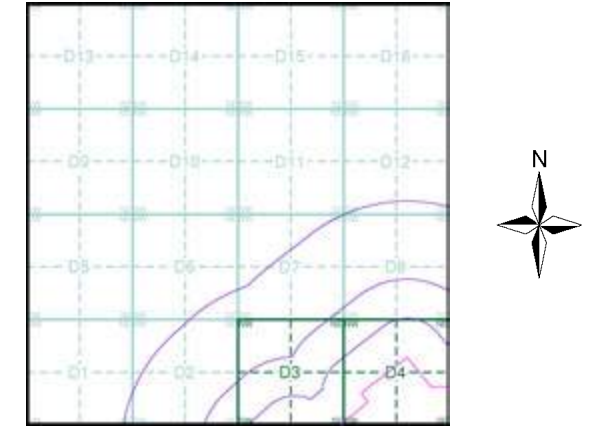
Yorkshire
Published 1853 - 1854
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

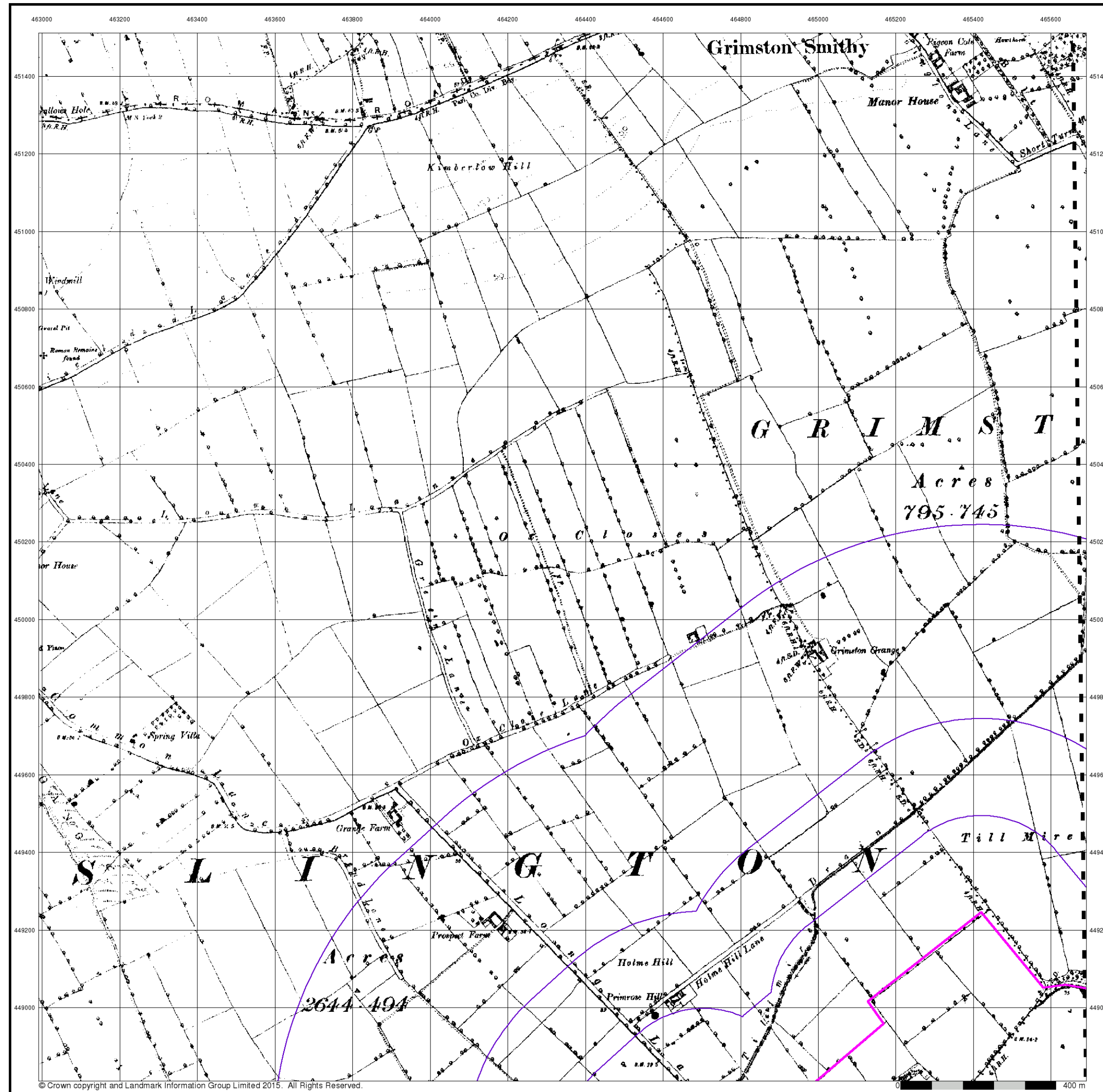


Historical Map - Slice D



Order Details
 Order Number: 95641417_1_1
 Customer Ref: 70011808-701
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 Slice: D
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

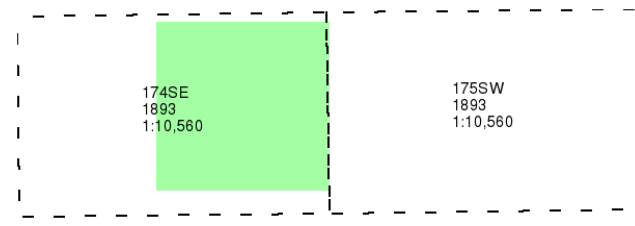
Site Details
 Site off Elvington Lane, York, YO41 4AU



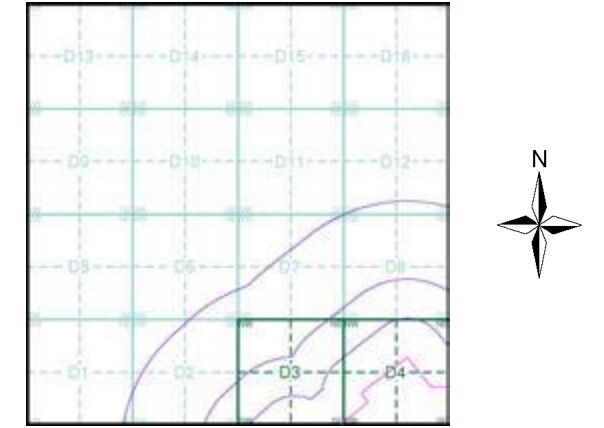
Yorkshire
Published 1893
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice D



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
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 Slice: D
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 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



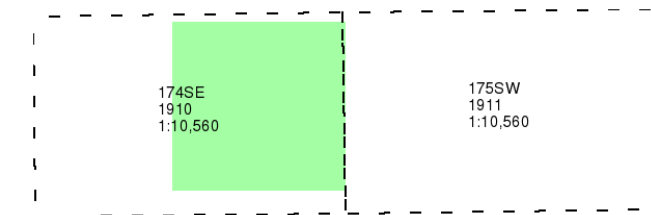
Yorkshire

Published 1910 - 1911

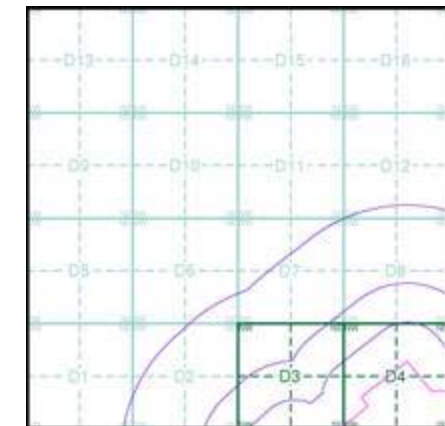
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice D



Order Details

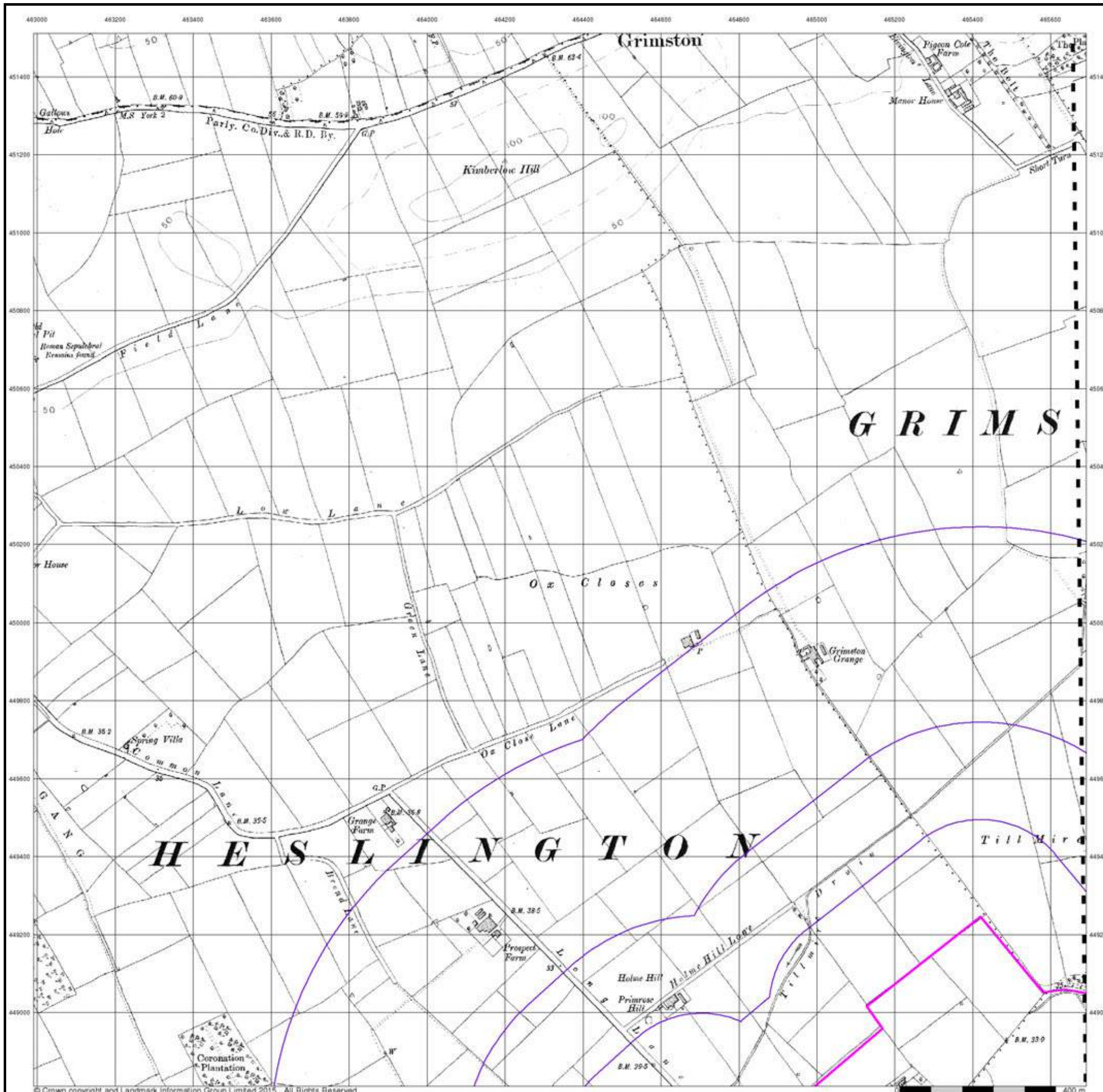
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Slice: D
Site Area (Ha): 246.75
Search Buffer (m): 1000

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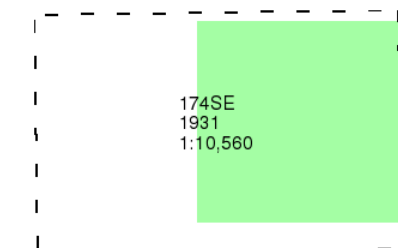
Yorkshire

Published 1931

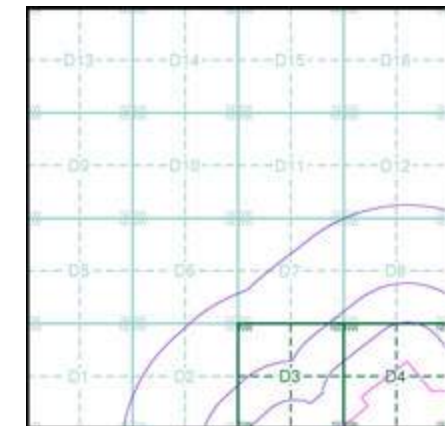
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice D



Order Details

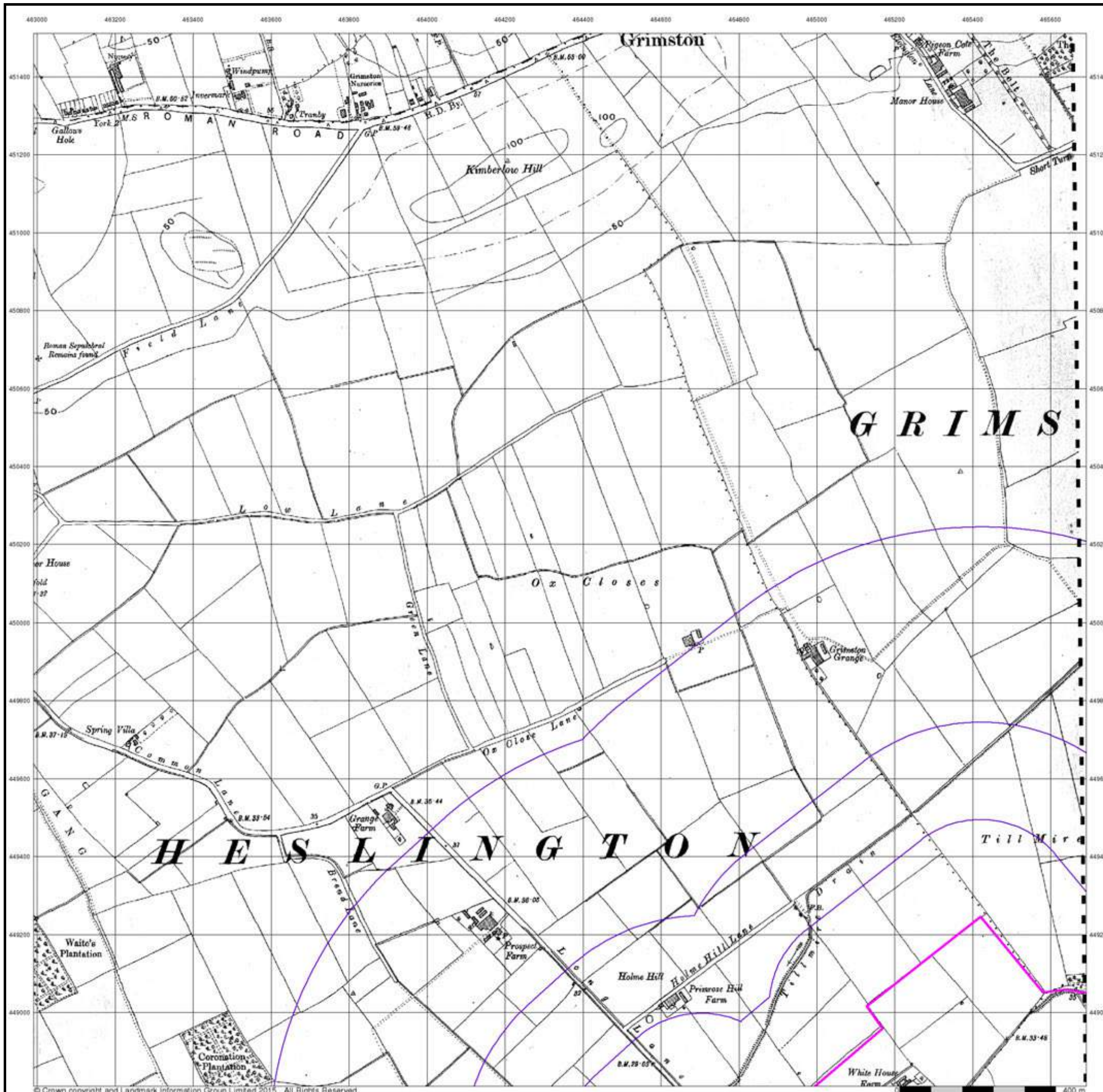
Order Number: 95641417_1_1
Customer Ref: 70011808-701
National Grid Reference: 464860, 449390
Slice: D
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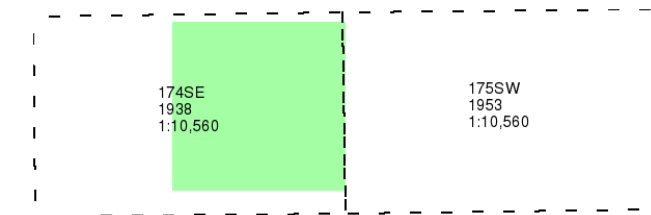
Yorkshire

Published 1938 - 1953

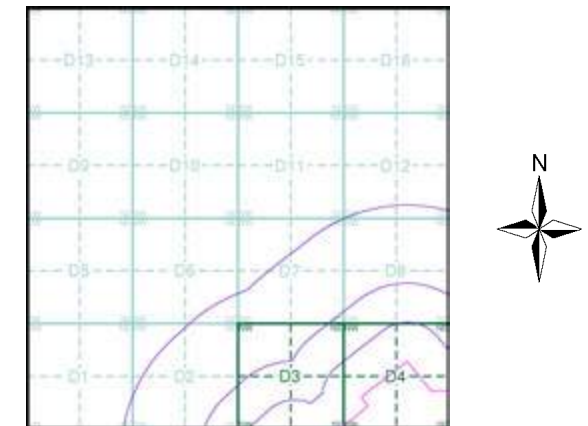
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice D



Order Details

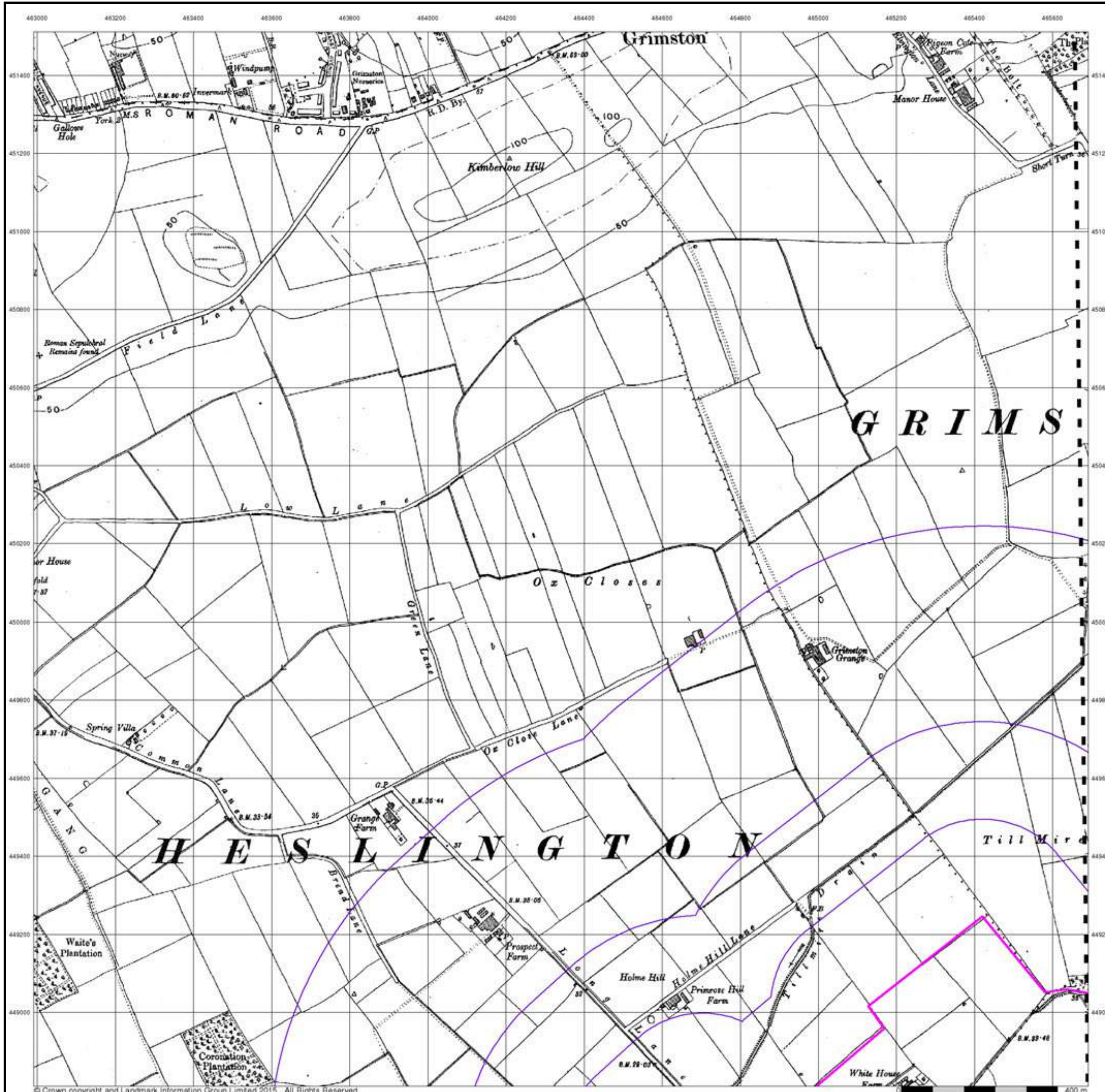
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National Grid Reference: 464860, 449390
Slice: D
Site Area (Ha): 246.75
Search Buffer (m): 1000

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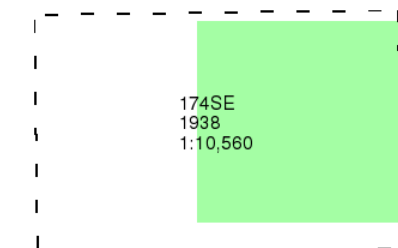
Yorkshire

Published 1938

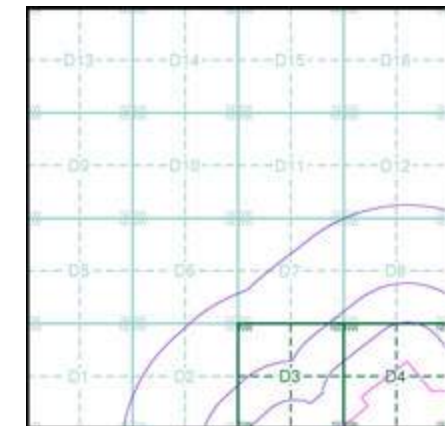
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice D



Order Details

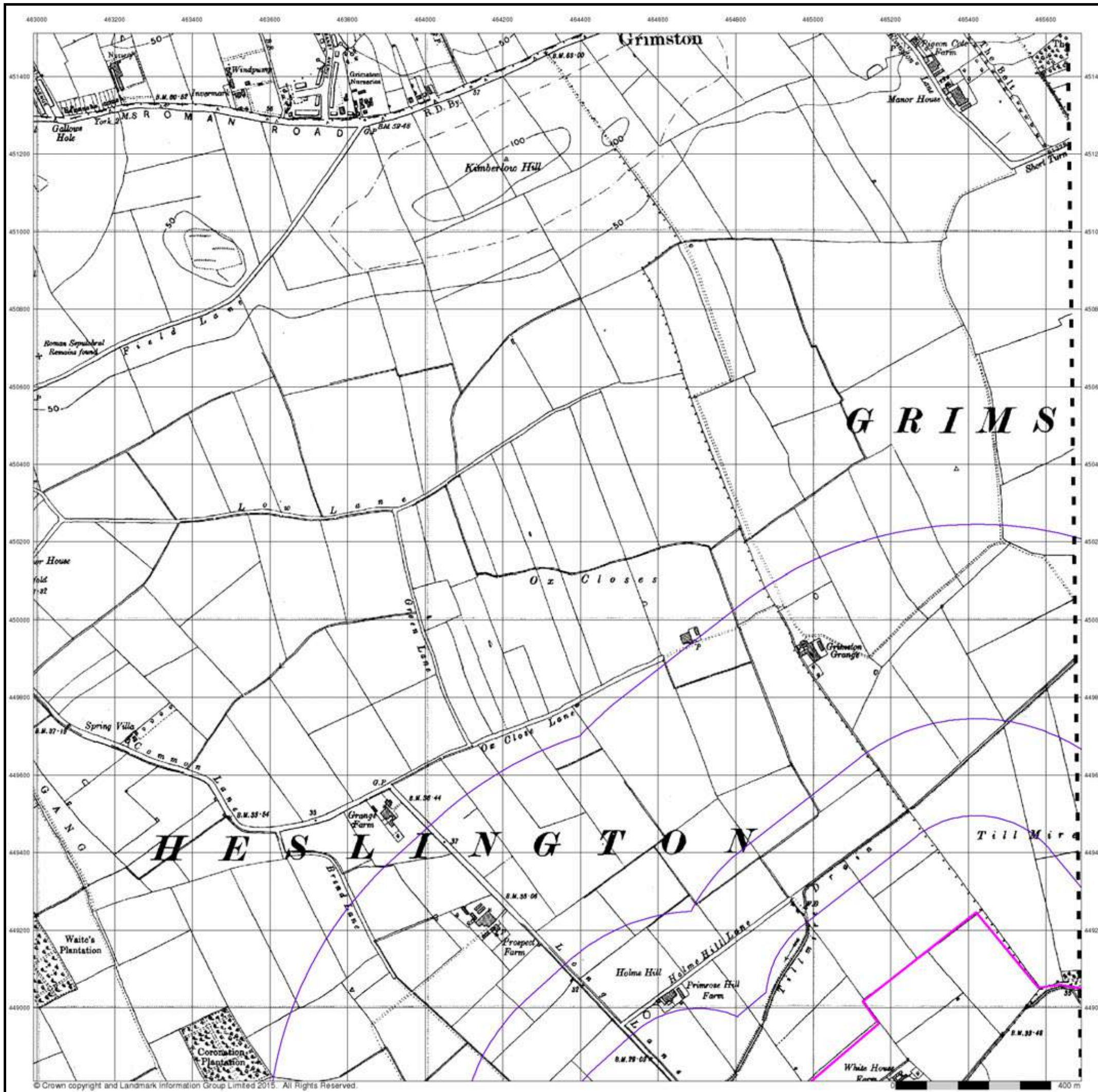
Order Number: 95641417_1_1
Customer Ref: 70011808-701
National Grid Reference: 464860, 449390
Slice: D
Site Area (Ha): 246.75
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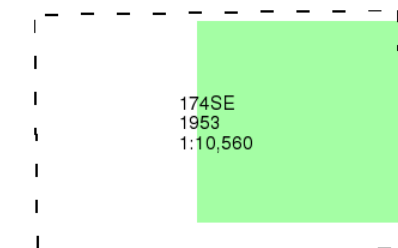
Yorkshire

Published 1953

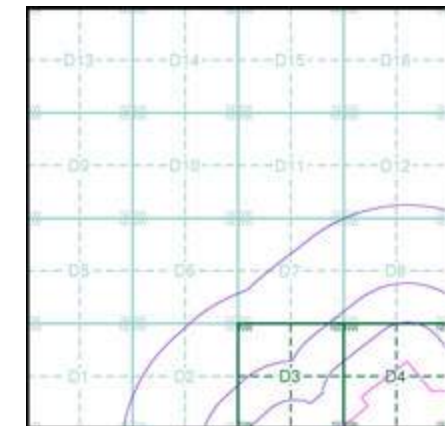
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice D



Order Details

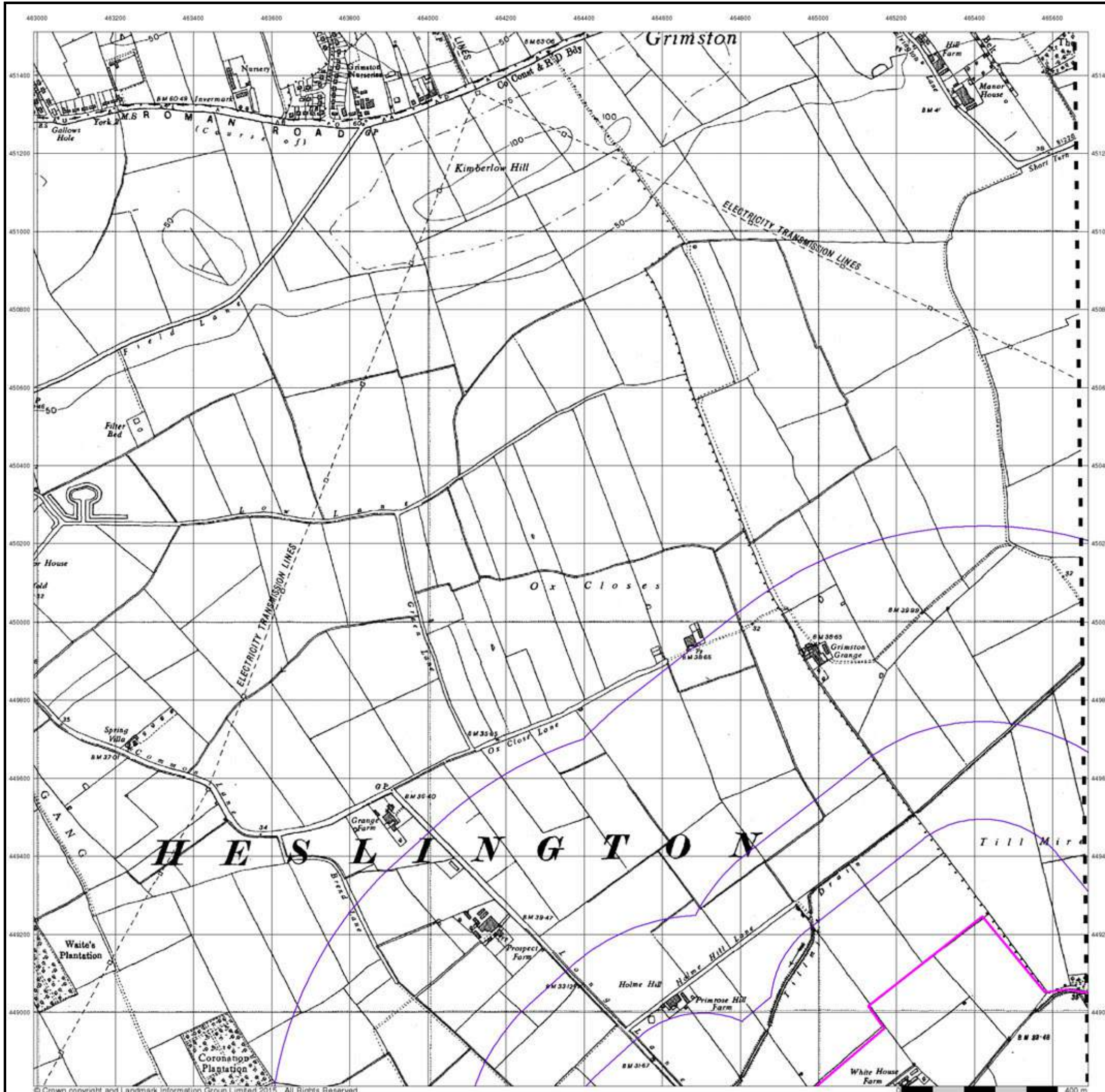
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National Grid Reference: 464860, 449390
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Site Area (Ha): 246.75
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Ordnance Survey Plan

Published 1958

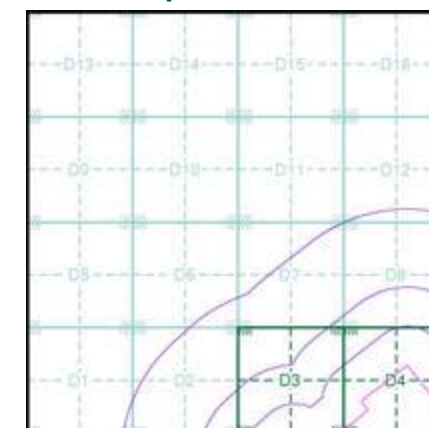
Source map scale - 1:10,000

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Map Name(s) and Date(s)

SE65SW	SE65SE
1958	1958
1:10,560	1:10,560
SE64NW	SE64NE
1958	1958
1:10,560	1:10,560

Historical Map - Slice D



Order Details

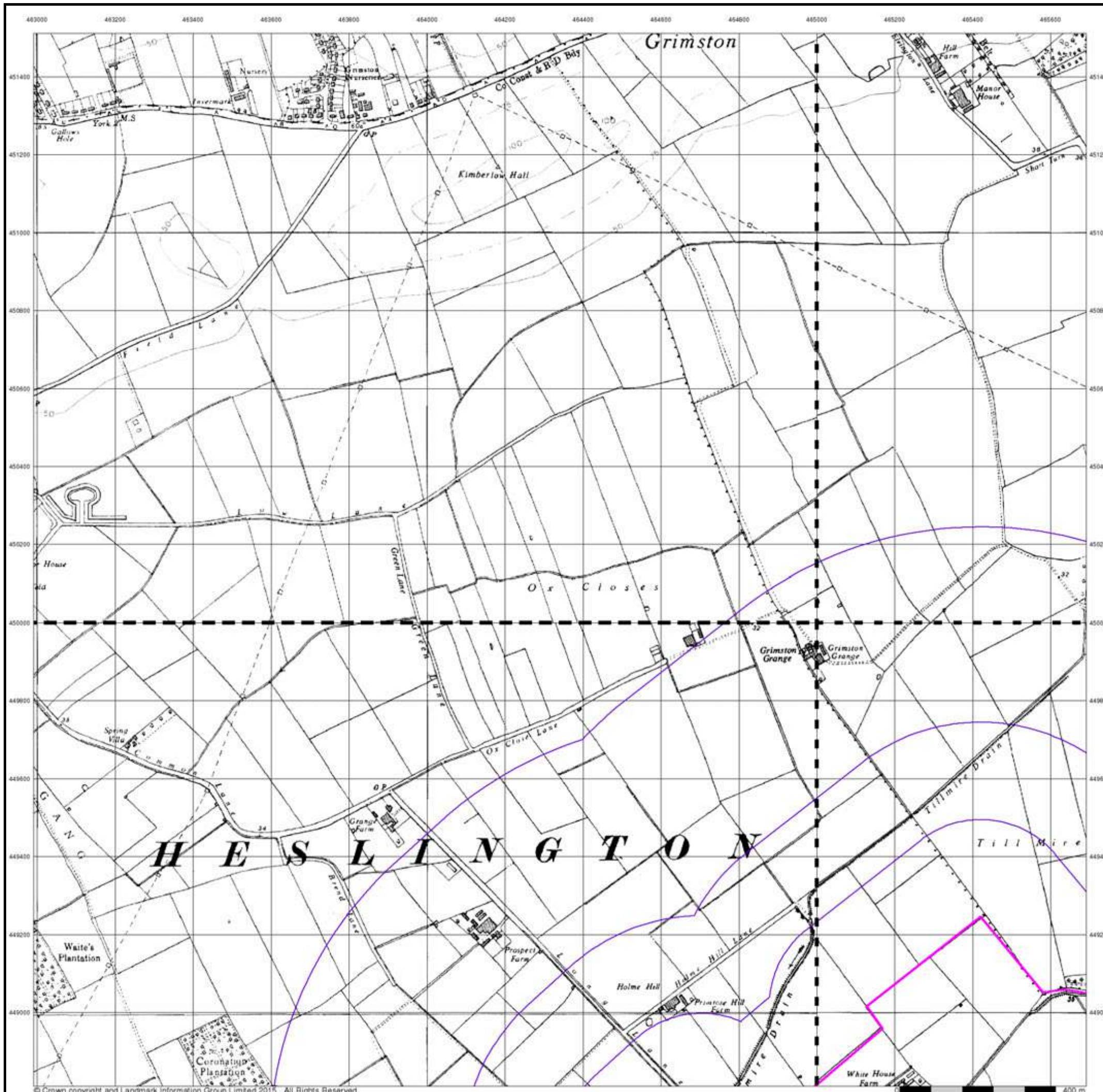
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 Search Buffer (m): 1000

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York

Published 1980

Source map scale - 1:10,000

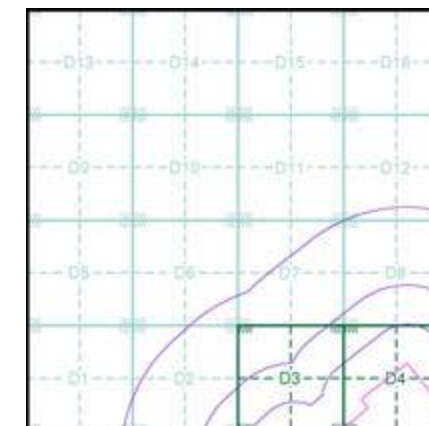
These maps were produced by the Russian military during the Cold War between 1950 and 1997, and cover 103 towns and cities throughout the U.K. The maps are produced at 1:25,000, 1:10,000 and 1:5,000 scale, and show detailed land use, with colour-coded areas for development, green areas, and non-developed areas. Buildings are coloured black and important building uses (such as hospitals, post offices, factories etc.) are numbered, with a numbered key describing their use.

They were produced by the Russians for the benefit of navigation, as well as strategic military sites and transport hubs, for use if they were to have invaded the U.K. The detailed information provided indicates that the areas were surveyed using land-based personnel, on the ground, in the cities that are mapped.

Map Name(s) and Date(s)

SE65SW 1980 1:10,000	SE65SE 1980 1:10,000
SE64NW 1980 1:10,000	SE64NE 1980 1:10,000

Russian Map - Slice D



Order Details

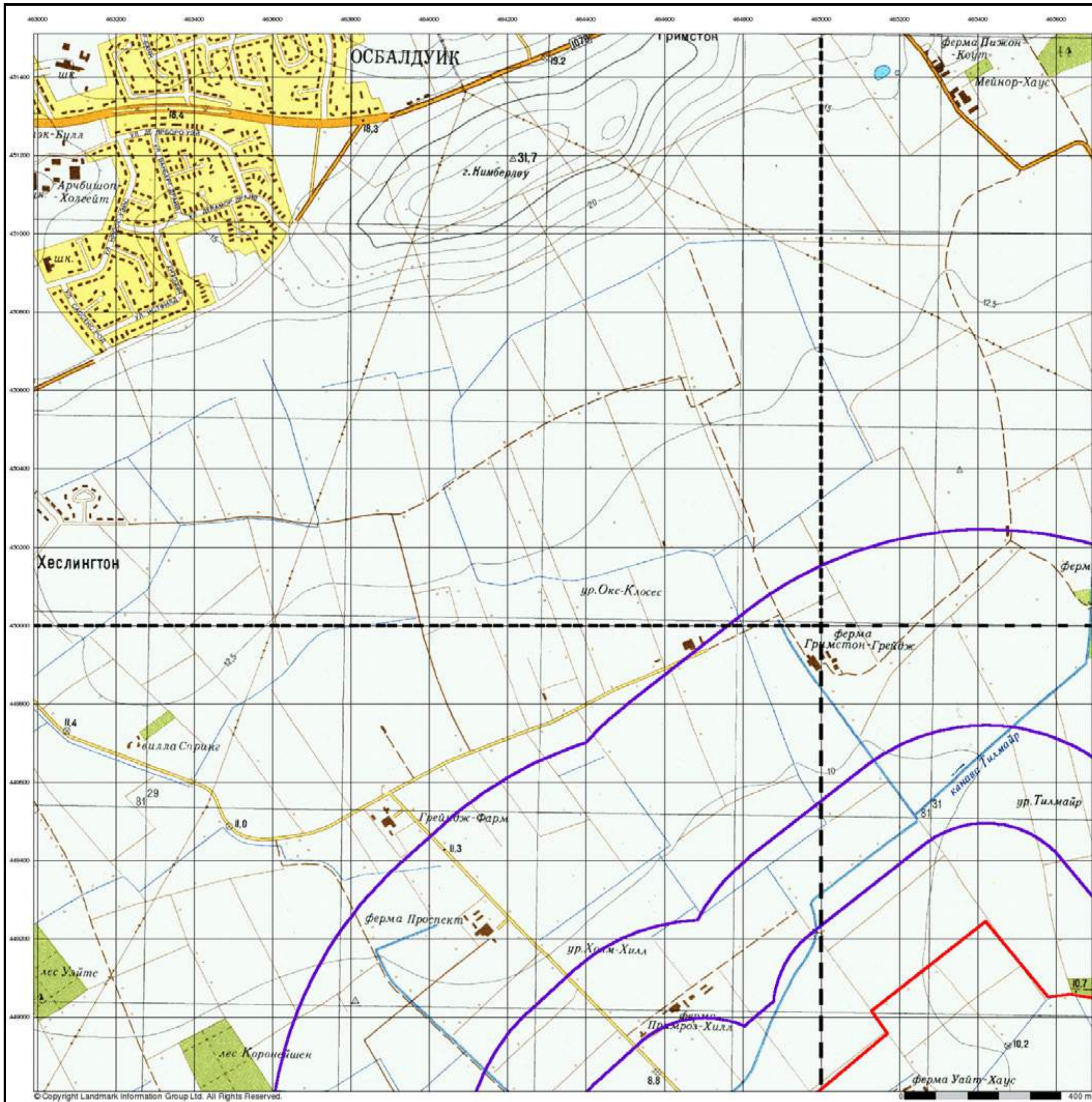
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Ordnance Survey Plan

Published 1981 - 1984

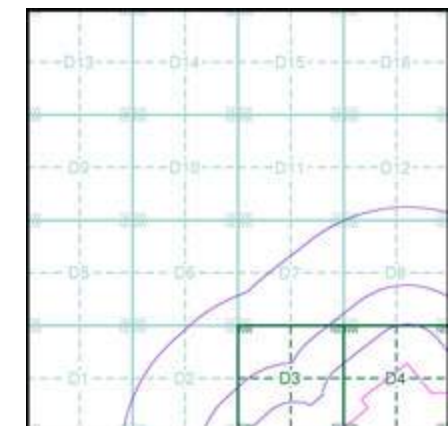
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

SE65SW	SE65SE
1982	1984
1:10,000	1:10,000
■	
SE64NW	
1981	
1:10,560	

Historical Map - Slice D



Order Details

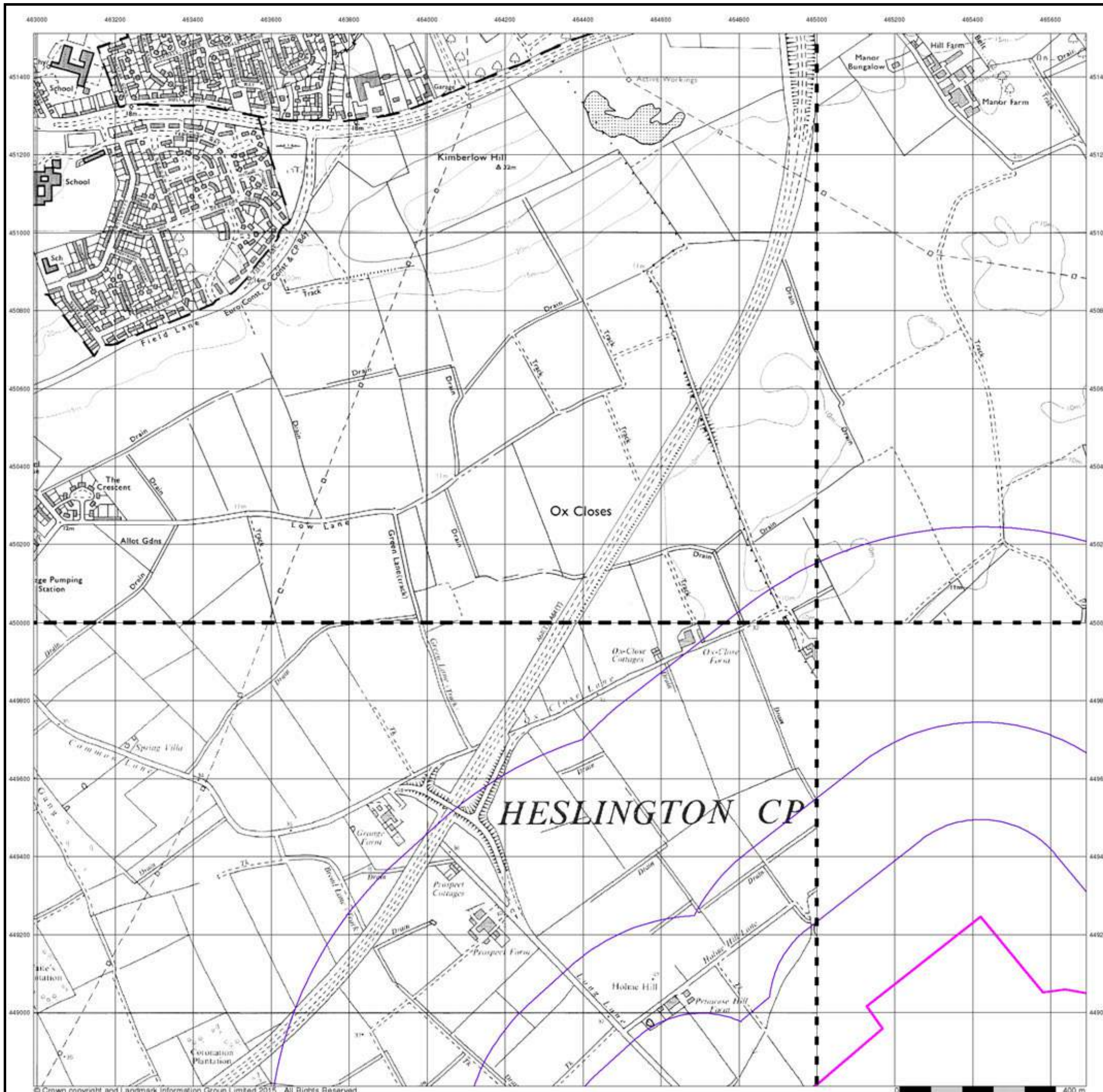
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 Slice: D
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

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10k Raster Mapping

Published 1999

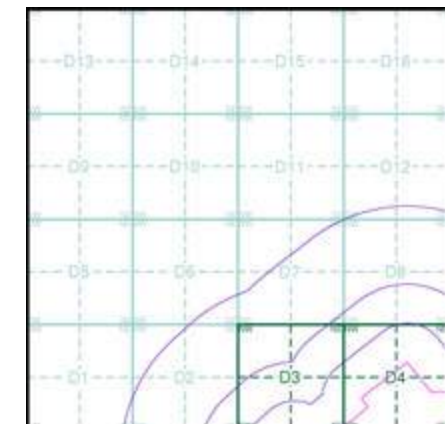
Source map scale - 1:10,000

The historical maps shown were produced from the Ordnance Survey's 1:10,000 colour raster mapping. These maps are derived from Landplan which replaced the old 1:10,000 maps originally published in 1970. The data is highly detailed showing buildings, fences and field boundaries as well as all roads, tracks and paths. Road names are also included together with the relevant road number and classification. Boundary information depiction includes county, unitary authority, district, civil parish and constituency.

Map Name(s) and Date(s)

SE65SW	SE65SE
1999	1999
1:10,000	1:10,000
SE64NW	SE64NE
1999	1999
1:10,000	1:10,000

Historical Map - Slice D



Order Details

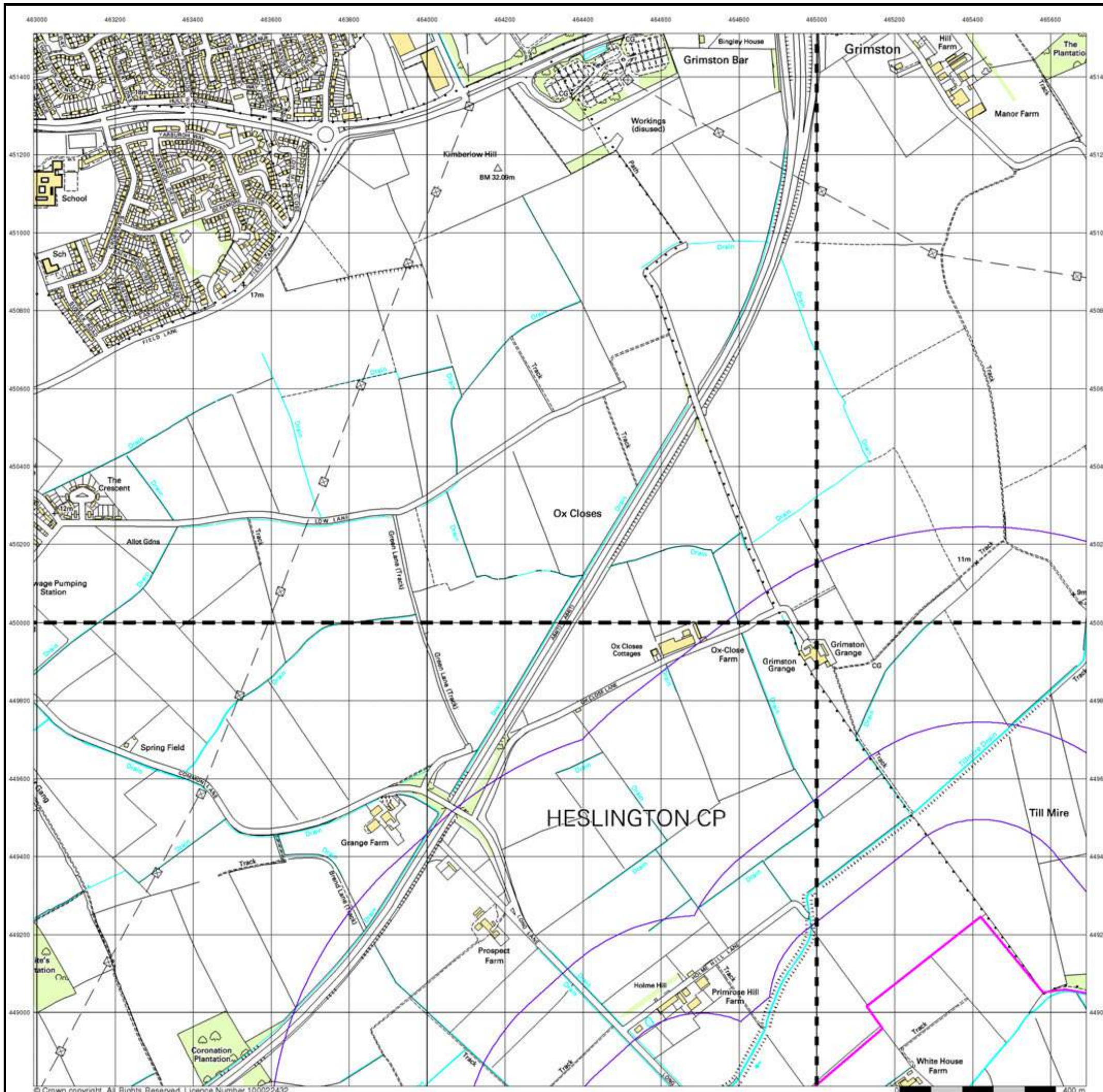
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 Search Buffer (m): 1000

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10k Raster Mapping

Published 2006

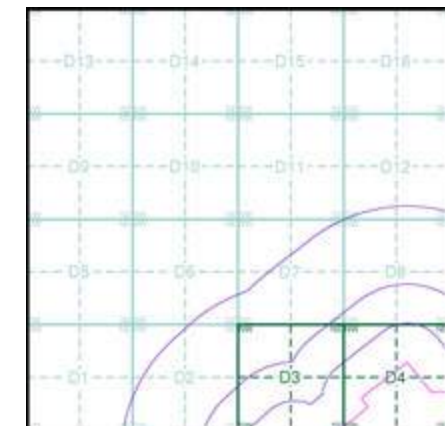
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The historical maps shown were produced from the Ordnance Survey's 1:10,000 colour raster mapping. These maps are derived from Landplan which replaced the old 1:10,000 maps originally published in 1970. The data is highly detailed showing buildings, fences and field boundaries as well as all roads, tracks and paths. Road names are also included together with the relevant road number and classification. Boundary information depiction includes county, unitary authority, district, civil parish and constituency.

Map Name(s) and Date(s)

SE65SW 2006 1:10,000	SE65SE 2006 1:10,000
SE64NW 2006 1:10,000	SE64NE 2006 1:10,000

Historical Map - Slice D



Order Details

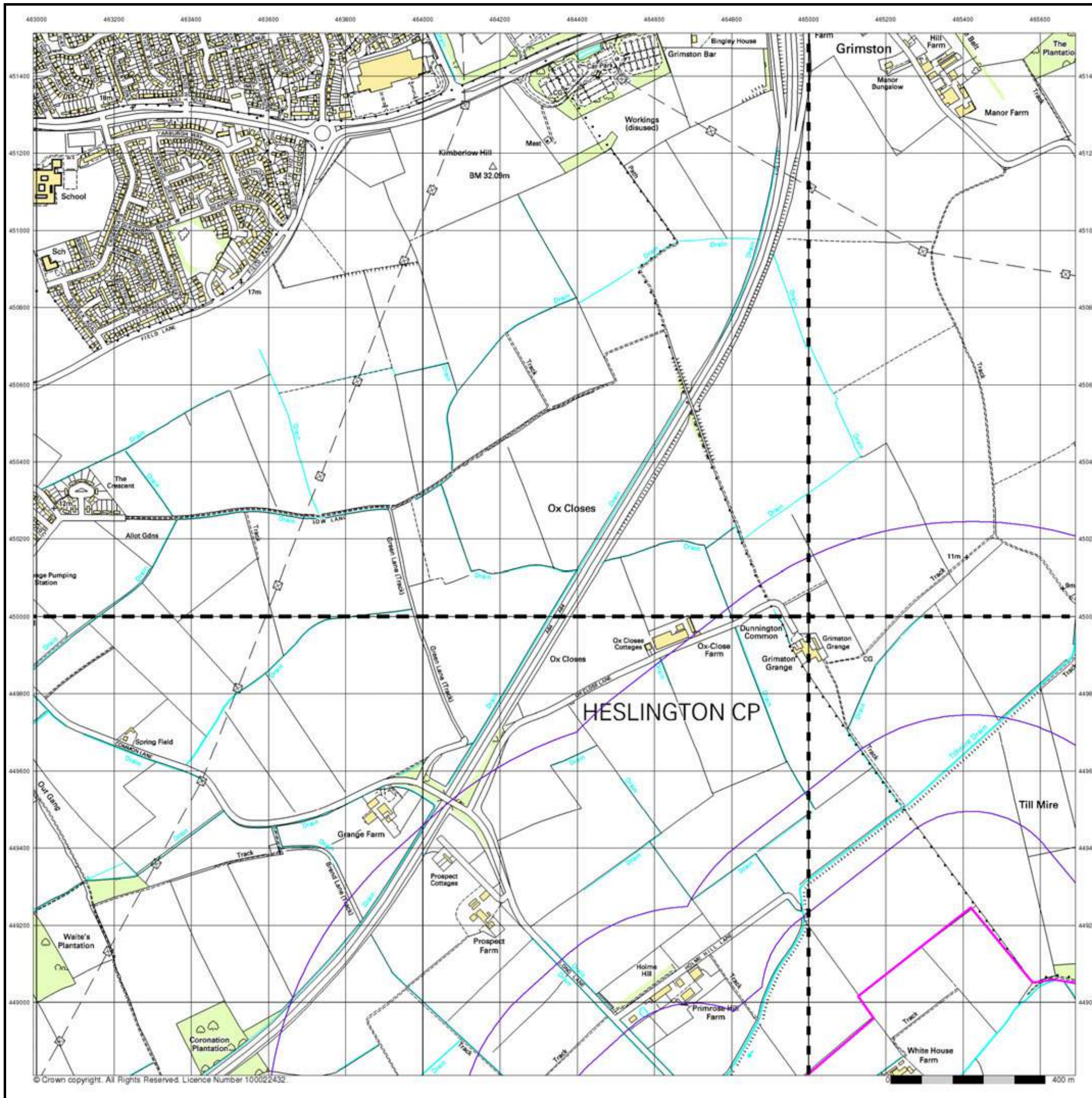
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 Customer Ref: 70011808-701
 National Grid Reference: 464860, 449390
 Slice: D
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

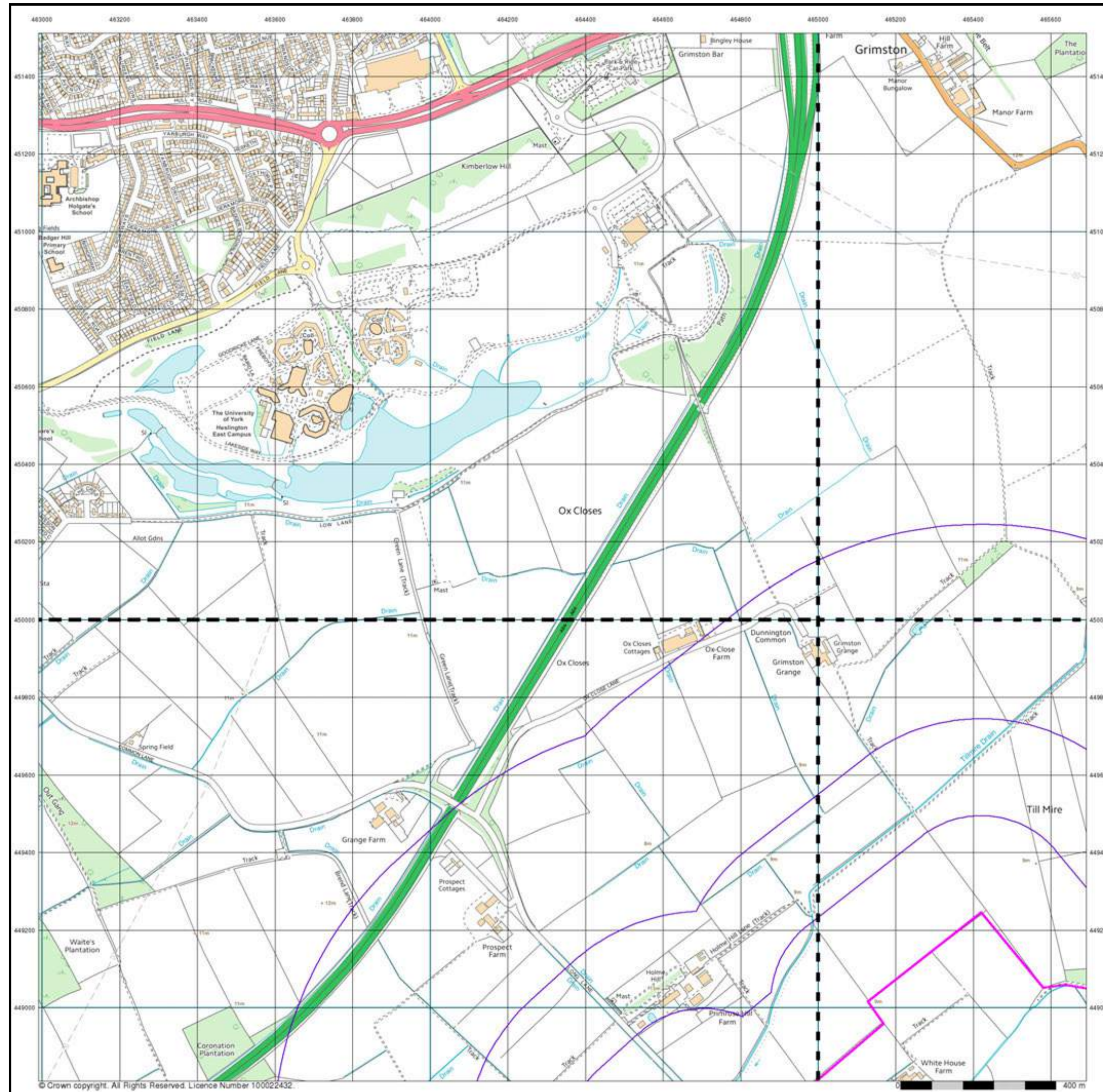
Site Details

Site off Elvington Lane, York, YO41 4AU



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 Web: www.envirocheck.co.uk





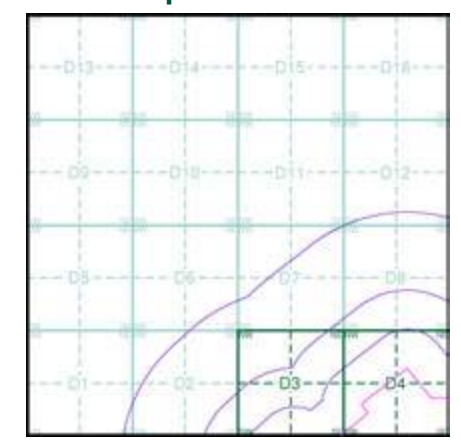
VectorMap Local
Published 2016
Source map scale - 1:10,000

VectorMap Local (Raster) is Ordnance Survey's highest detailed 'backdrop' mapping product. These maps are produced from OS's VectorMap Local, a simple vector dataset at a nominal scale of 1:10,000, covering the whole of Great Britain, that has been designed for creating graphical mapping. OS VectorMap Local is derived from large-scale information surveyed at 1:1250 scale (covering major towns and cities), 1:2500 scale (smaller towns, villages and developed rural areas), and 1:10 000 scale (mountain, moorland and river estuary areas).

Map Name(s) and Date(s)

SE65SW 2016 Variable	SE65SE 2016 Variable
SE64NW 2016 Variable	SE64NE 2016 Variable

Historical Map - Slice D



Order Details

Order Number: 95641417_1_1
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 Slice: D
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU

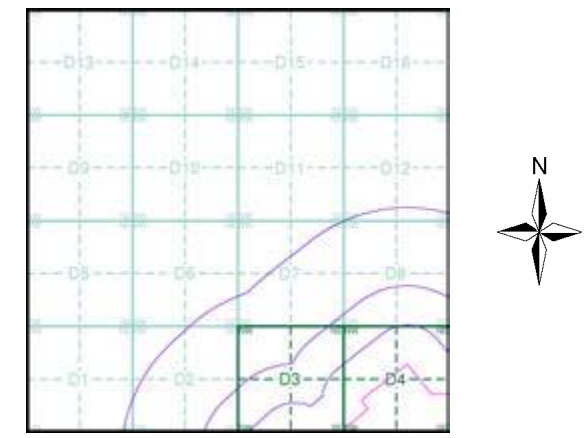


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- General**
- Specified Site
 - Specified Buffer(s)
 - Bearing Reference Point
 - Map ID
 - Several of Type at Location
- Agency and Hydrological**
- Contaminated Land Register Entry or Notice (Location)
 - Contaminated Land Register Entry or Notice
 - Discharge Consent
 - Enforcement or Prohibition Notice
 - Integrated Pollution Control
 - Integrated Pollution Prevention Control
 - Local Authority Integrated Pollution Prevention and Control
 - Local Authority Pollution Prevention and Control
 - Local Authority Pollution Prevention and Control Enforcement
 - Pollution Incident to Controlled Waters
 - Prosecution Relating to Authorised Processes
 - Prosecution Relating to Controlled Waters
 - Registered Radioactive Substance
 - River Network or Water Feature
 - River Quality Sampling Point
 - Substantiated Pollution Incident Register
 - Water Abstraction
 - Water Industry Act Referral
- Hazardous Substances**
- COMAH Site
 - Explosive Site
 - NIHS Site
 - Planning Hazardous Substance Consent
 - Planning Hazardous Substance Enforcement
 - BGS Recorded Mineral Site
- Waste**
- BGS Recorded Landfill Site (Location)
 - BGS Recorded Landfill Site
 - EA Historic Landfill (Buffered Point)
 - EA Historic Landfill (Polygon)
 - Integrated Pollution Control Registered Waste Site
 - Licensed Waste Management Facility (Landfill Boundary)
 - Licensed Waste Management Facility (Location)
 - Local Authority Recorded Landfill Site (Location)
 - Local Authority Recorded Landfill Site
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Water)
 - Potentially Infilled Land (Water)
 - Potentially Infilled Land (Water)
 - Registered Landfill Site (Location)
 - Registered Landfill Site (Point Buffered to 100m)
 - Registered Landfill Site (Point Buffered to 250m)
 - Registered Waste Transfer Site (Location)
 - Registered Waste Transfer Site
 - Registered Waste Treatment or Disposal Site (Location)
 - Registered Waste Treatment or Disposal Site

Site Sensitivity Map - Slice D



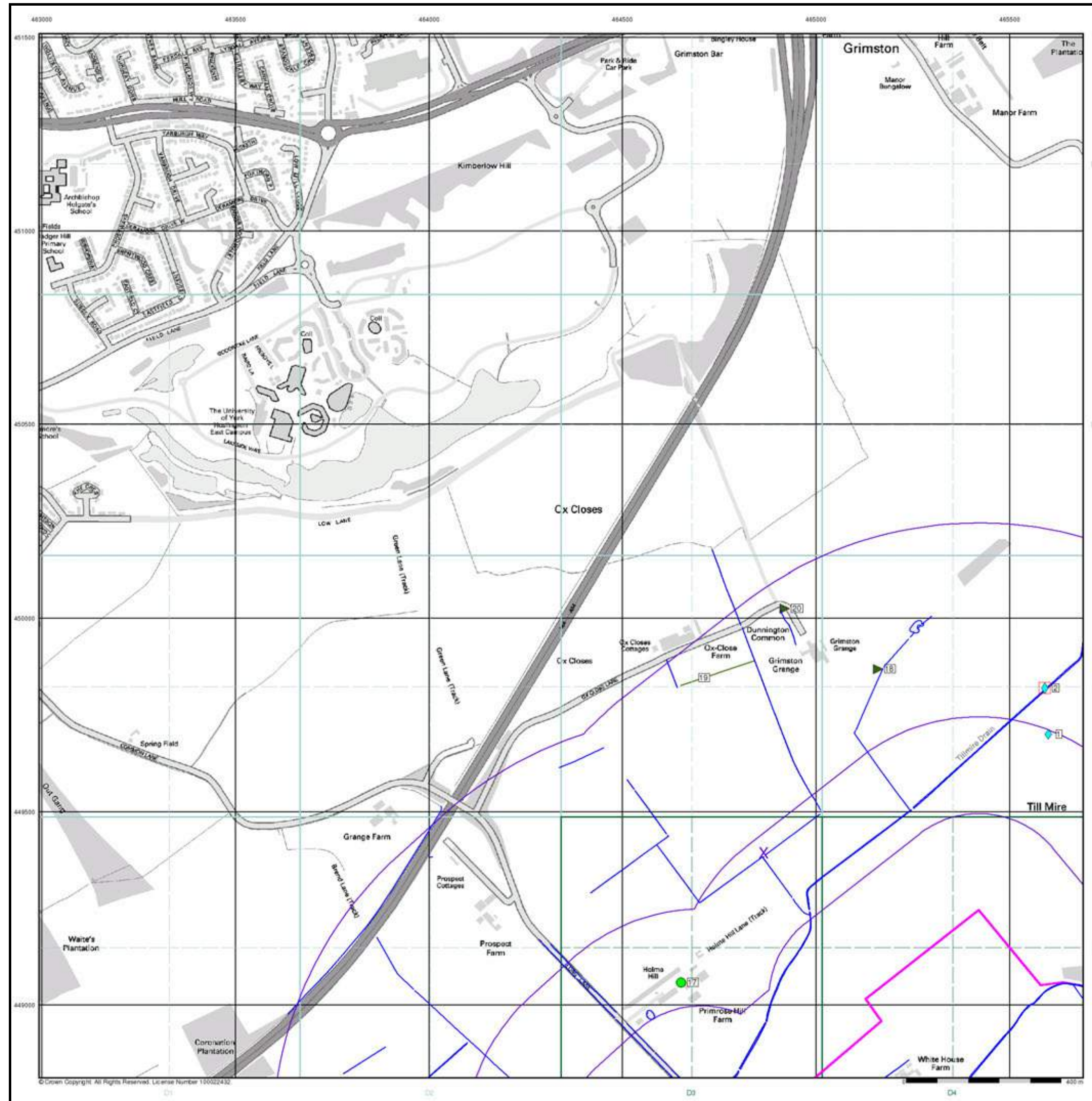
Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 464860, 449390
 Slice: D
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU

Landmark Information Group
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 Web: www.envirocheck.co.uk








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Industrial Land Use Map

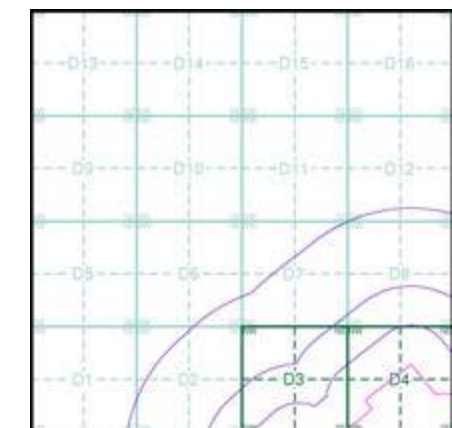
General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point
-  Slice
-  Map ID

Industrial Land Use

-  Contemporary Trade Directory Entry
-  Fuel Station Entry
-  Gas Pipeline
-  Points of Interest - Commercial Services
-  Points of Interest - Education and Health
-  Points of Interest - Manufacturing and Production
-  Points of Interest - Public Infrastructure
-  Points of Interest - Recreational and Environmental
-  Underground Electrical Cables

Industrial Land Use Map - Slice D



Order Details

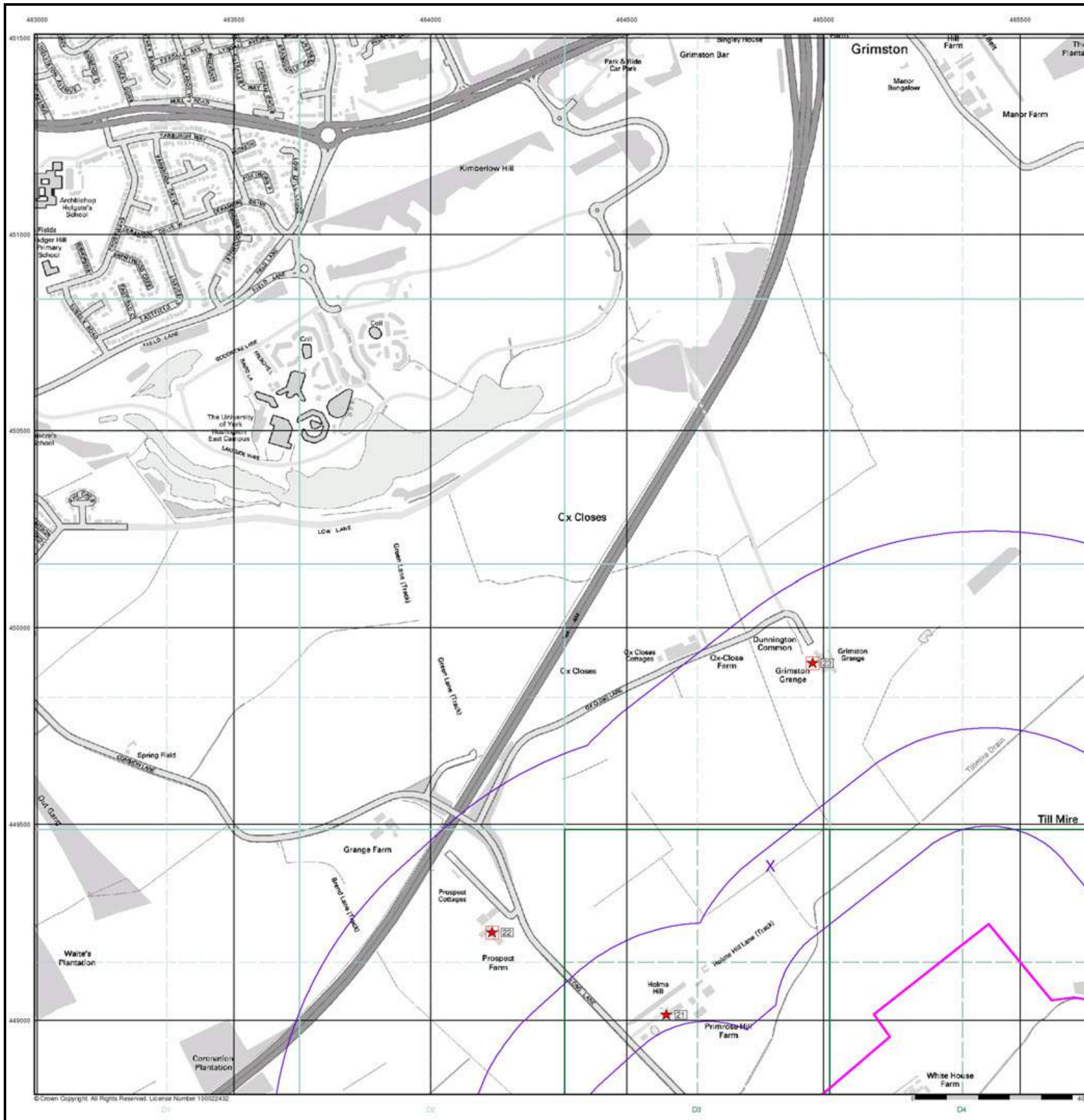
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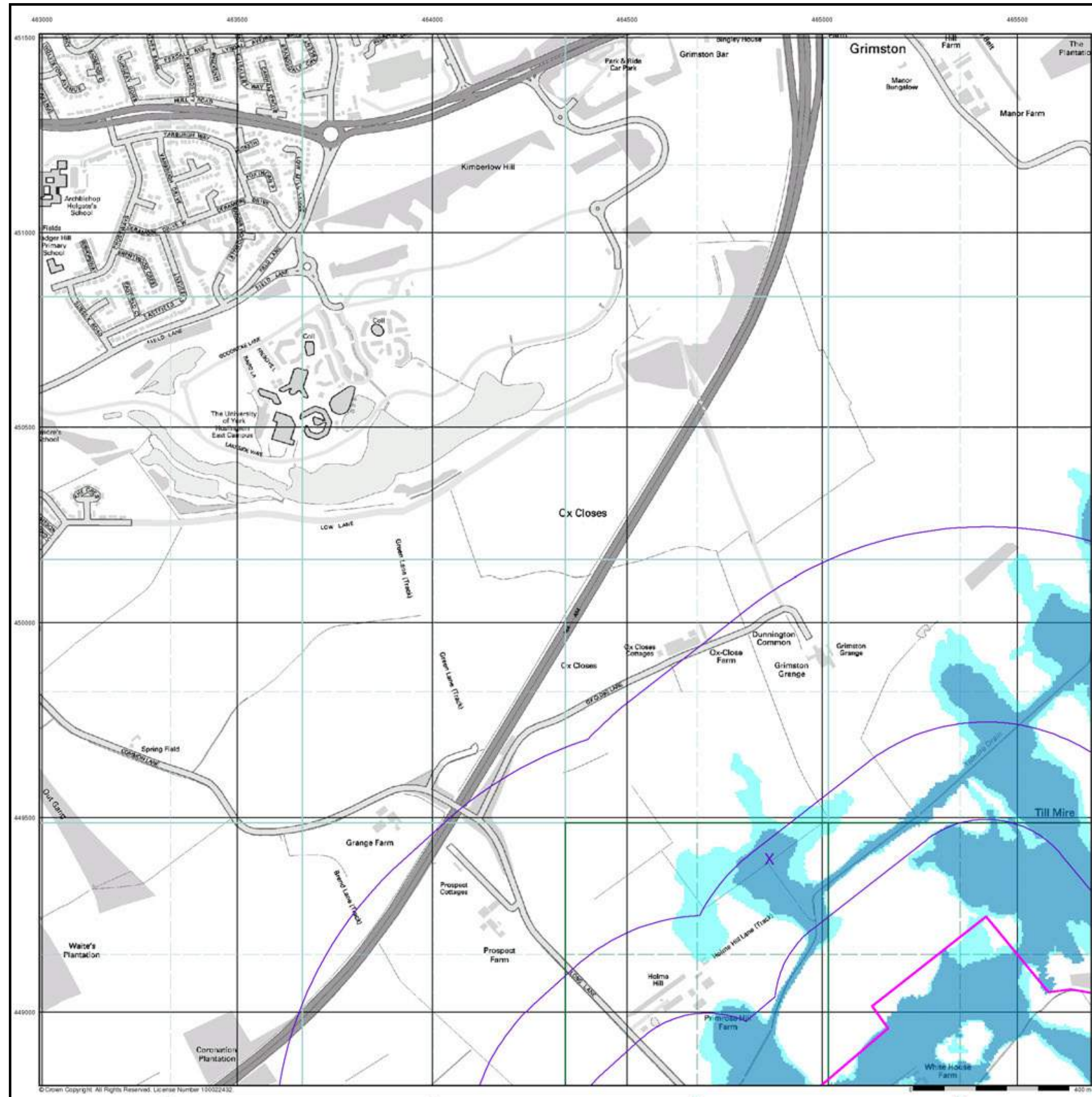


General

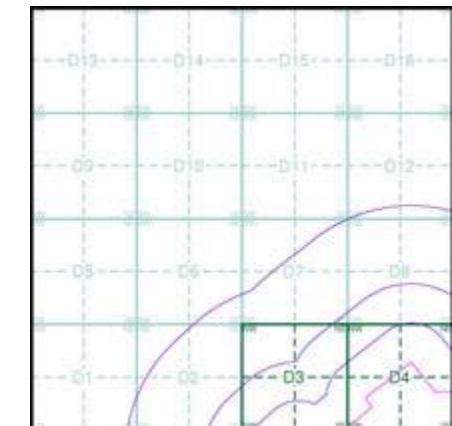
- Specified Site
- Specified Buffer(s)
- Bearing Reference Point

Agency and Hydrological (Flood)

- Extreme Flooding from Rivers or Sea without Defences (Zone 2)
- Flooding from Rivers or Sea without Defences (Zone 3)
- Area Benefiting from Flood Defence
- Flood Water Storage Areas
- Flood Defence



Flood Map - Slice D



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 464860, 449390
 Slice: D
 Site Area (Ha): 246.75
 Search Buffer (m): 1000






Site Details

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General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point
-  Map ID
-  Several of Type at Location

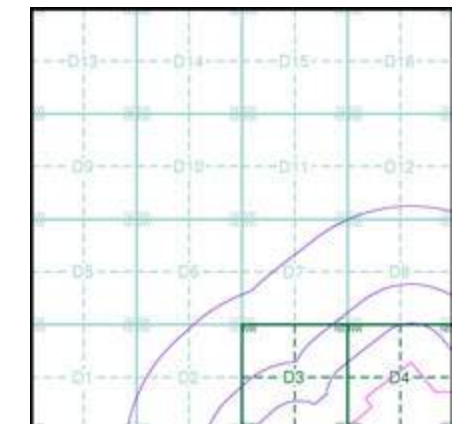
Agency and Hydrological (Boreholes)

-  BGS Borehole Depth 0 - 10m
-  BGS Borehole Depth 10 - 30m
-  BGS Borehole Depth 30m +
-  Confidential
-  Other

For Borehole information please refer to the Borehole .csv file which accompanied this slice.

A copy of the BGS Borehole Ordering Form is available to download from the Support section of www.envirocheck.co.uk.

Borehole Map - Slice D

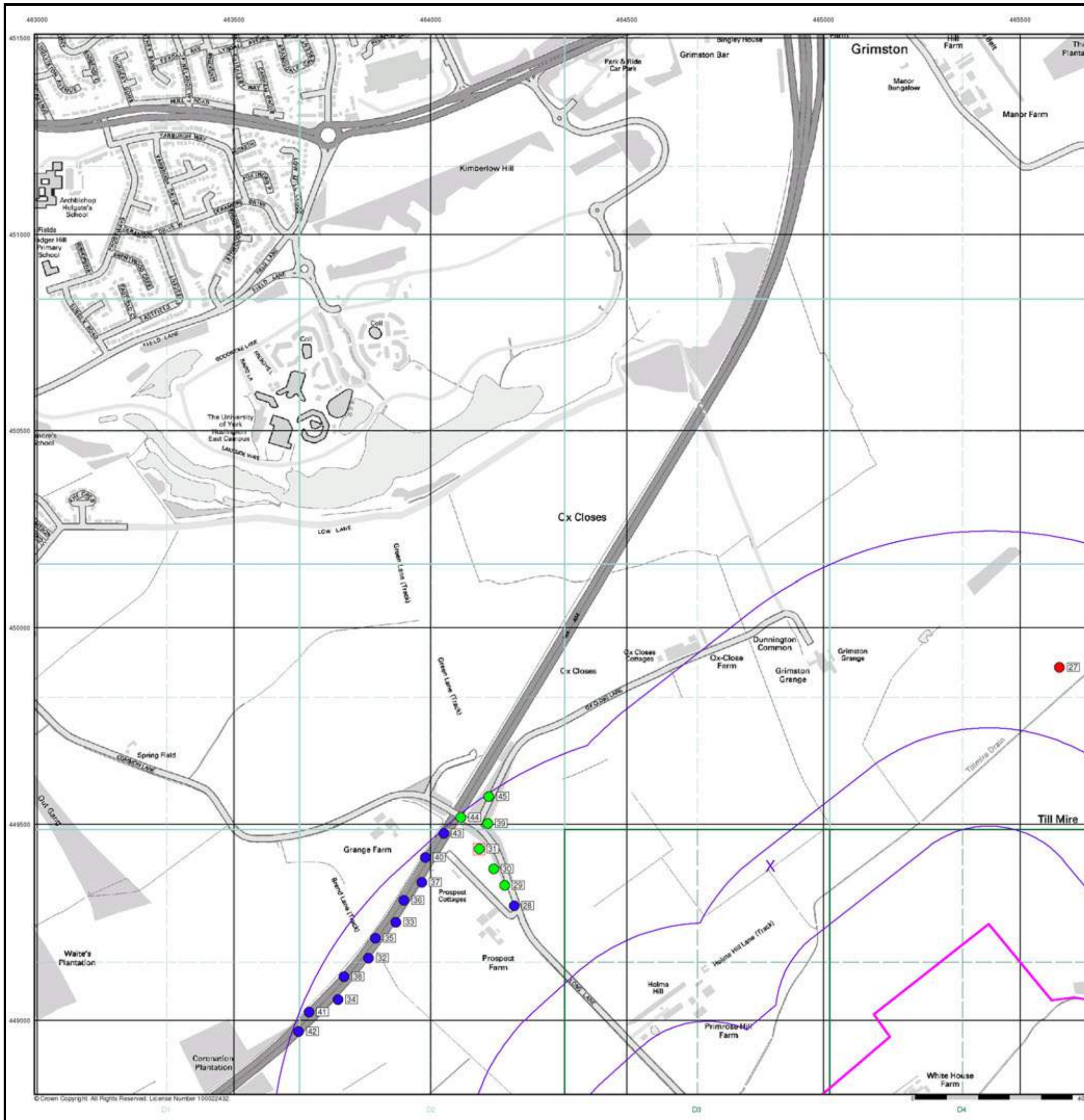


Order Details

Order Number: 95641417_1_1
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 Slice: D
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Site Details

Site off Elvington Lane, York, YO41 4AU





General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point
- Map ID

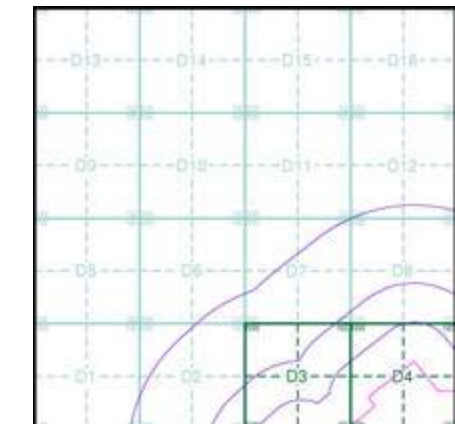
Detailed River Network Data

- Primary River
- Secondary River
- Tertiary River
- Canal
- Canal Tunnel
- Undefined River
- Lake/Reservoir
- Offline Drainage Feature
- Extended Culvert (greater than 50m)
- Underground River (inferred)
- Underground River (local knowledge)
- Downstream of High Water Mark
- Downstream of Seaward Extension
- Not assigned River feature

Contours (height in metres)

- Standard Contour 105
- Master Contour 100
- Spot Height *167.3
- MLW - Mean Low Water
- MHW - Mean High Water

E/NRW Detailed River Network Map - Slice D



Order Details

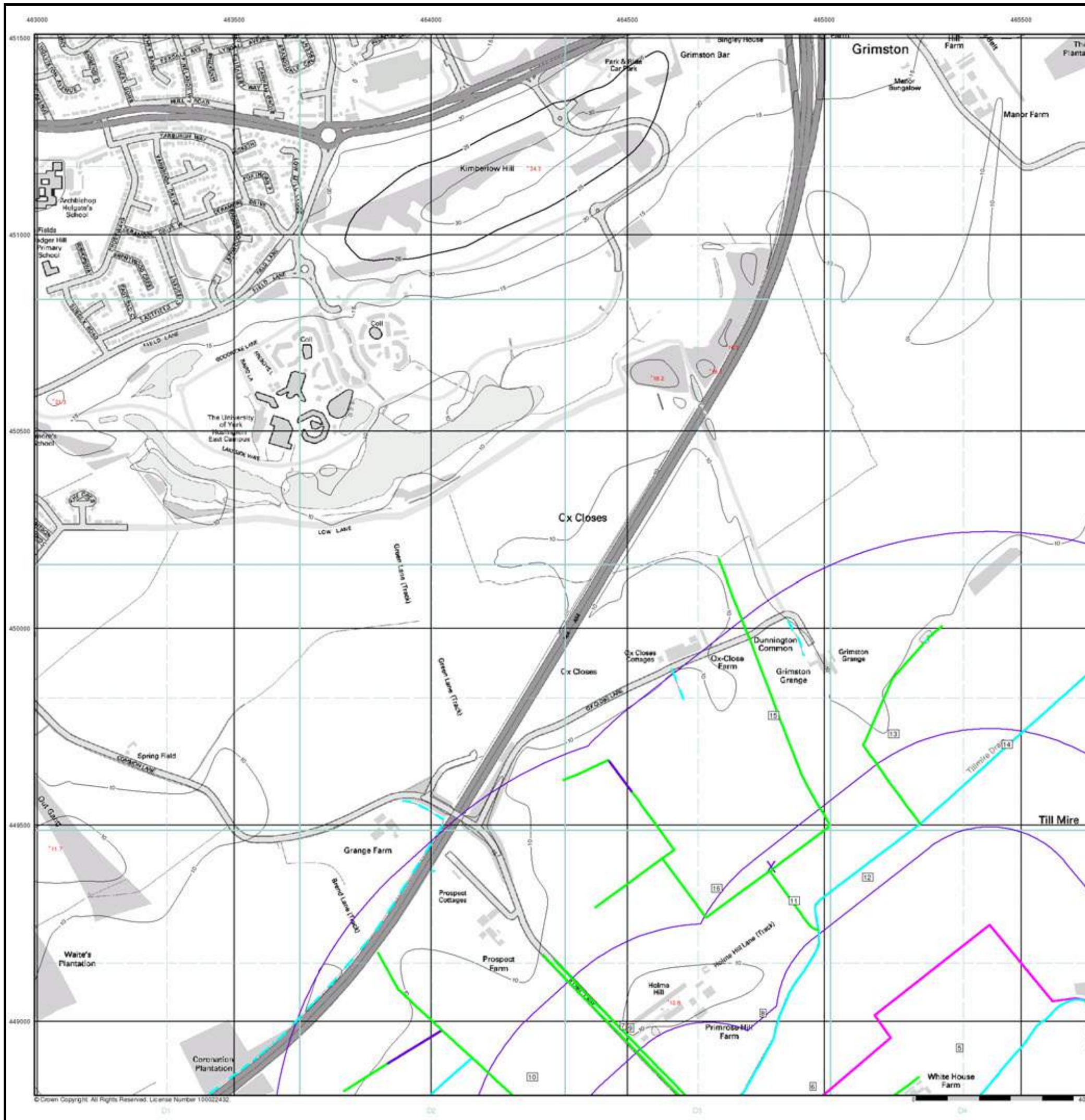
Order Number: 95641417_1_1
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Site Details




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General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point

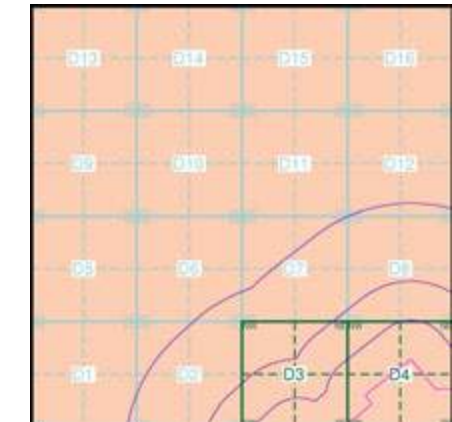
Risk of Flooding from Surface Water

-  High - 30 Year Return
-  Medium - 100 Year Return
-  Low - 1000 Year Return

Suitability

- See the suitability map below
-  National to county
 -  County to town
 -  Town to street
 -  Street to parcels of land
 -  Property

E/ANRW Suitability Map - Slice D

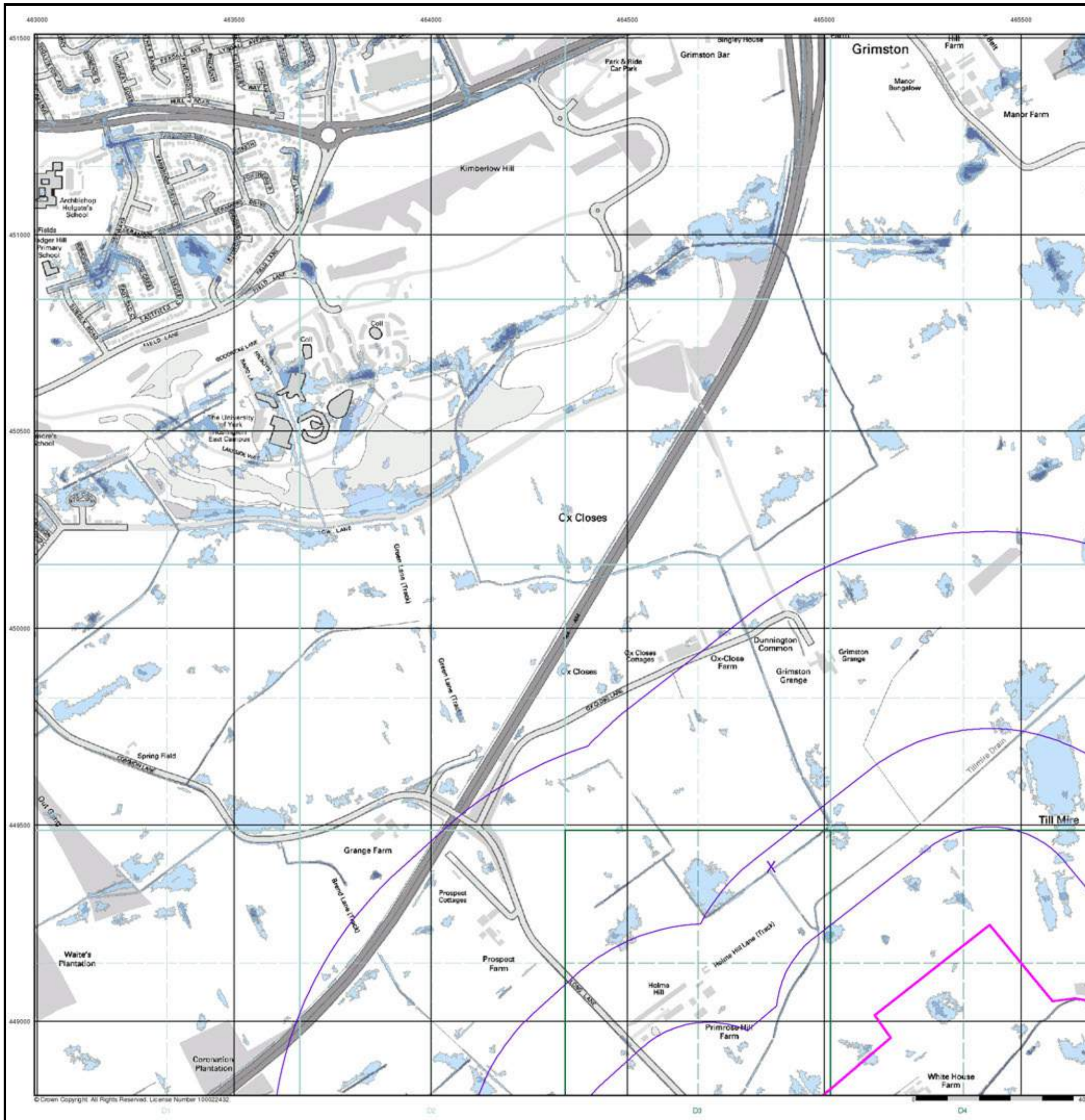


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Site Details

Site off Elvington Lane, York, YO41 4AU



Historical Mapping Legends

Ordnance Survey County Series 1:10,560

- Gravel Pit
- Sand Pit
- Other Pits
- Quarry
- Shingle
- Orchard
- Osiers
- Reeds
- Marsh
- Mixed Wood
- Deciduous
- Brushwood
- Fir
- Furze
- Rough Pasture
- Arrow denotes flow of water
- Trigonometrical Station
- Site of Antiquities
- Bench Mark
- Pump, Guide Post, Signal Post
- Well, Spring, Boundary Post
- 285** Surface Level
- Sketched Contour
- Instrumental Contour
- Main Roads
- Minor Roads
- Sunken Road
- Raised Road
- Road over Railway
- Railway over River
- Railway over Road
- Level Crossing
- Road over River or Canal
- Road over Stream
- Road over Stream
- County Boundary (Geographical)
- County & Civil Parish Boundary
- Administrative County & Civil Parish Boundary
- Co. Boro. Bdy. County Borough Boundary (England)
- Co. Burgh Bdy. County Burgh Boundary (Scotland)
- R.D. Bdy. Rural District Boundary
- Civil Parish Boundary

Ordnance Survey Plan 1:10,000

- Chalk Pit, Clay Pit or Quarry
- Gravel Pit
- Sand Pit
- Disused Pit or Quarry
- Refuse or Slag Heap
- Lake, Loch or Pond
- Dunes
- Boulders
- Coniferous Trees
- Non-Coniferous Trees
- Orchard
- Scrub
- Coppice
- Bracken
- Heath
- Rough Grassland
- Marsh
- Reeds
- Saltings
- Building
- Glasshouse
- Sloping Masonry
- Pylon
- Electricity Transmission Line
- Pole
- Cutting
- Embankment
- Standard Gauge Multiple Track
- Standard Gauge Single Track
- Siding, Tramway or Mineral Line
- Narrow Gauge
- Geographical County
- Administrative County, County Borough or County of City
- Municipal Borough, Urban or Rural District, Burgh or District Council
- Borough, Burgh or County Constituency
- Civil Parish
- BP, BS
- Ch
- CH
- F E Sta
- FB
- Fn
- GP
- MP
- MS
- Pol Sta
- PO
- PC
- PH
- SB
- Spr
- TCB
- TCP
- W

1:10,000 Raster Mapping

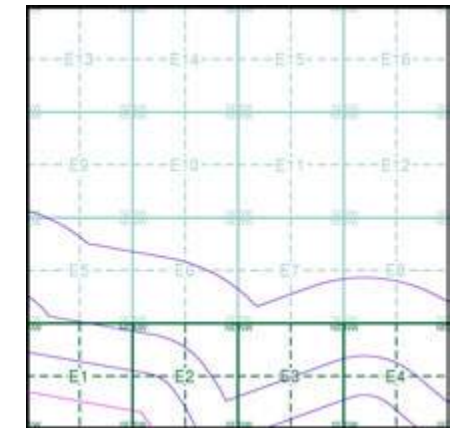
- Gravel Pit
- Rock
- Boulders
- Shingle
- Sand
- Slopes
- Refuse tip or slag heap
- Rock (scattered)
- Boulders (scattered)
- Mud
- Sand Pit
- Top of cliff
- General detail
- Overhead detail
- Multi-track railway
- Single track railway
- County boundary (England only)
- District, Unitary, Metropolitan, London Borough boundary
- Civil, parish or community boundary
- Constituency boundary
- Area of wooded vegetation
- Non-coniferous trees
- Coniferous trees (scattered)
- Coniferous trees
- Positioned tree
- Orchard
- Coppice or Osiers
- Rough Grassland
- Heath
- Scrub
- Marsh, Salt Marsh or Reeds
- Water feature
- Flow arrows
- MHW(S) Mean high water (springs)
- MLW(S) Mean low water (springs)
- Telephone line (where shown)
- Electricity transmission line (with poles)
- Bench mark (where shown)
- Triangulation station
- Point feature (e.g. Guide Post or Mile Stone)
- Pylon, flare stack or lighting tower
- Site of (antiquity)
- Glasshouse
- General Building
- Important Building



Historical Mapping & Photography included:

Mapping Type	Scale	Date	Pg
Yorkshire	1:10,560	1853 - 1854	3
Yorkshire	1:10,560	1893	4
Yorkshire	1:10,560	1910 - 1911	5
Yorkshire	1:10,560	1931	6
Yorkshire	1:10,560	1938 - 1953	7
Yorkshire	1:10,560	1938	8
Yorkshire	1:10,560	1953	9
Ordnance Survey Plan	1:10,000	1958	10
Ordnance Survey Plan	1:10,000	1971 - 1972	11
York	1:10,000	1980	12
Ordnance Survey Plan	1:10,000	1984	13
10K Raster Mapping	1:10,000	1999	14
10K Raster Mapping	1:10,000	2006	15
VectorMap Local	1:10,000	2016	16

Historical Map - Slice E



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 466940, 449330
 Slice: E
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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Russian Military Mapping Legends

1:5,000 and 1:10,000 mapping

a. Not drawn to scale b. Drawn to scale

Government and Administrative Buildings
Military and Industrial Buildings
Military and Communication Areas
Subway Entrance
Fireproof Building
Prominent Fireproof Building
Non-fireproof Building
Non-fireproof Building (non-dwelling)
Factory, mill, and flour mill, with chimneys
Factory, mill, and flour mill, without chimneys
Power Station, drawn to scale
Hydroelectric Power Station
Radio Station, drawn to scale
Telephone Station, drawn to scale
Abandoned Open-pit Mine or Quarry
Open-pit Salt Mine
Pit
Oil Deposit or Well
Oil Seepage
Tailings Pile
Fuel Storage Tanks
Natural Gas Tank
Bench Mark
Drill Hole
Burial Mound
Triangulation Point on Burial Mound
Single-track Railroad
Double-track Railroad and Station Building
Coniferous Forest
Deciduous Forest
Mixed Forest
Lawns
Citrus Orchard
Wet Ground
Scattered Vegetation

243.8 Values for prominent elevations
186.0 Numbers for spot elevations, depth soundings, contour lines, etc.
0.2 Velocity of the current, width of river bed, depth of river
Fractional terms: length and capacity of bridges; depth of fords and condition of the river bottom; height of forest and the diameter of trees

Russian Alphabet (For reference and phonetic interpretation of map text)

А а (A)	З з (Z)	П п (P)	Ч ч (CH)
Б б (B)	И и (I)	Р р (R)	Ш ш (SH)
В в (V)	Й й (Y)	С с (S)	Щ щ (SHCH)
Г г (G)	К к (K)	Т т (T)	Ъ (-)
Д д (D)	Л л (L)	У у (U)	Ы (Y)
Е е (E)	М м (M)	Ф ф (F)	Ь (')
Ё ё (YO)	Н н (N)	Х х (KH)	Э э (E)
Ж ж (ZH)	О о (O)	Ц ц (TS)	Ю ю (YU or IU)
			Я я (YA or IA)

1:25,000 mapping

a. Not drawn to scale b. Drawn to scale

Government and Administrative Buildings
Military and Industrial Buildings
Military and Communication Areas
Subway Entrance
Partly Demolished Buildings
Demolished Buildings
Built-Up Area with Fireproof Buildings Predominant
Built-Up Area with Non-Fireproof Buildings Predominant
Individual Fireproof Building
Prominent Industrial Building
Individual Dwelling, Fireproof
Ruins of an Individual Dwelling
Factory or Mill Chimney
Factory or Mill with Chimney
Factory or Mill without Chimney
Mine or Open Pit Mine
Operating Shaft or Mine
Non-Operating Shaft or Mine
Salt Mine
Tailings Pile
Pit
Stone Quarry
Gas Pump or Service Station
Fuel Storage or Natural Gas Tank
Oil or Natural Gas Derrick
Small Hydroelectric Power Station
Power Station
Transformer Station
Cemetery
Burial Mound (height in metres)
Triangulation Point on Burial Mound
Triangulation Point
Bench Mark
Bench Mark (monumented)
Telegraph Office
Telephone Station
Radio Station
Radio Tower
Airfield or Seaplane Base
Landing Strip
Cut
Fill
Km Post
Plantings
Telegraph/Telephone Lines
Main Highway
Highway under Construction
Improved Dirt Road (former truck road)
Width of Road
Steep Grade
Small Bridge
Pipe (Culvert)
Tunnel
Dismantled Railroad
Double-track Railroad with First Class Station
Railroad Under Construction
Shore Embankment
River or Ditch with Embankment
Water Gauge
Direction and velocity of current
Water Level Mark
Well
Water Reservoir or Rain Water Pit
Spring
Isobath with value
Heavy (Index) Contour Line
Contour Line and Value
Half Contour Line
Spot Elevation Value
Coniferous
Deciduous
Mixed
Scrub

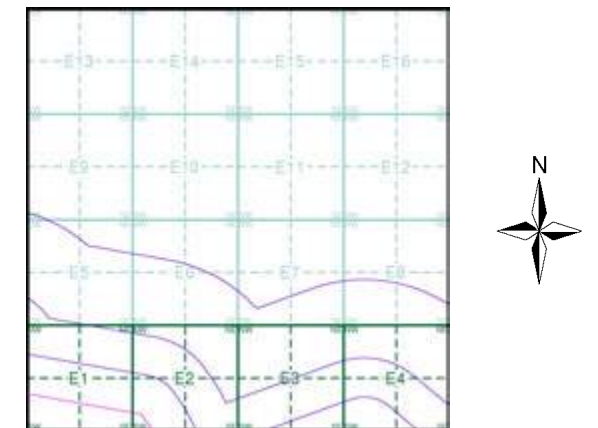
Key to Numbers on Mapping



Historical Mapping & Photography included:

Mapping Type	Scale	Date	Pg
Yorkshire	1:10,560	1853 - 1854	3
Yorkshire	1:10,560	1893	4
Yorkshire	1:10,560	1910 - 1911	5
Yorkshire	1:10,560	1931	6
Yorkshire	1:10,560	1938 - 1953	7
Yorkshire	1:10,560	1938	8
Yorkshire	1:10,560	1953	9
Ordnance Survey Plan	1:10,000	1958	10
Ordnance Survey Plan	1:10,000	1971 - 1972	11
York	1:10,000	1980	12
Ordnance Survey Plan	1:10,000	1984	13
10K Raster Mapping	1:10,000	1999	14
10K Raster Mapping	1:10,000	2006	15
VectorMap Local	1:10,000	2016	16

Russian Map - Slice E



Order Details

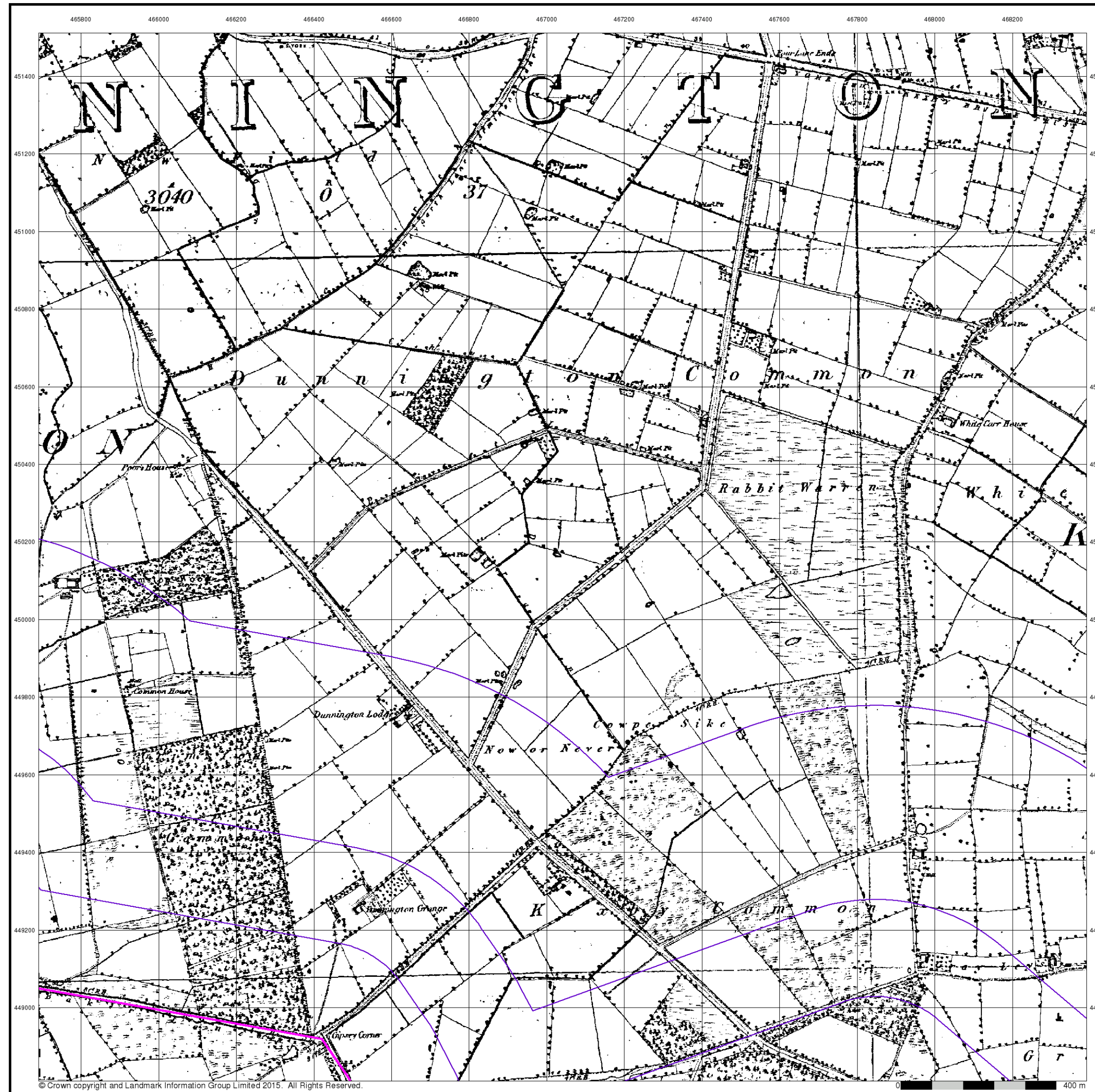
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 466940, 449330
 Slice: E
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



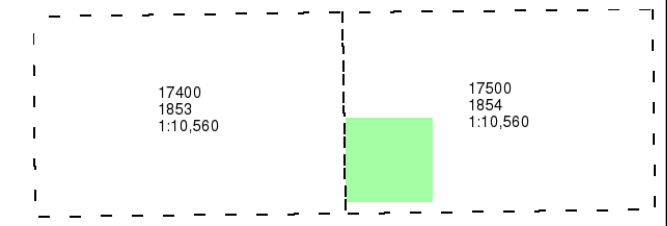
Tel: 0844 844 9952
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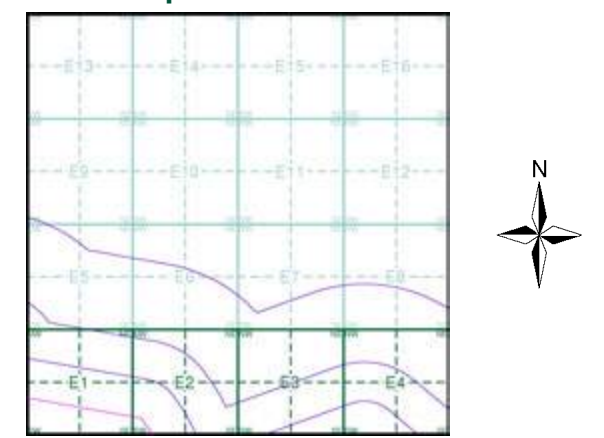
Yorkshire
Published 1853 - 1854
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice E



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 466940, 449330
 Slice: E
 Site Area (Ha): 246.75
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Site Details

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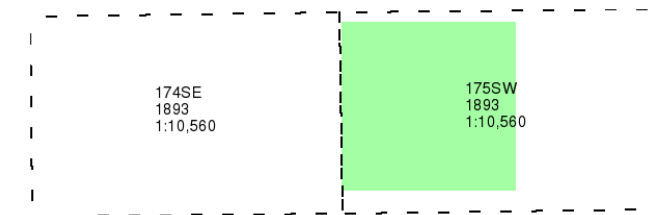
Yorkshire

Published 1893

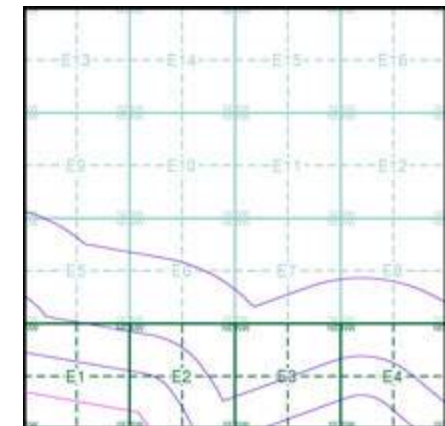
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

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Historical Map - Slice E



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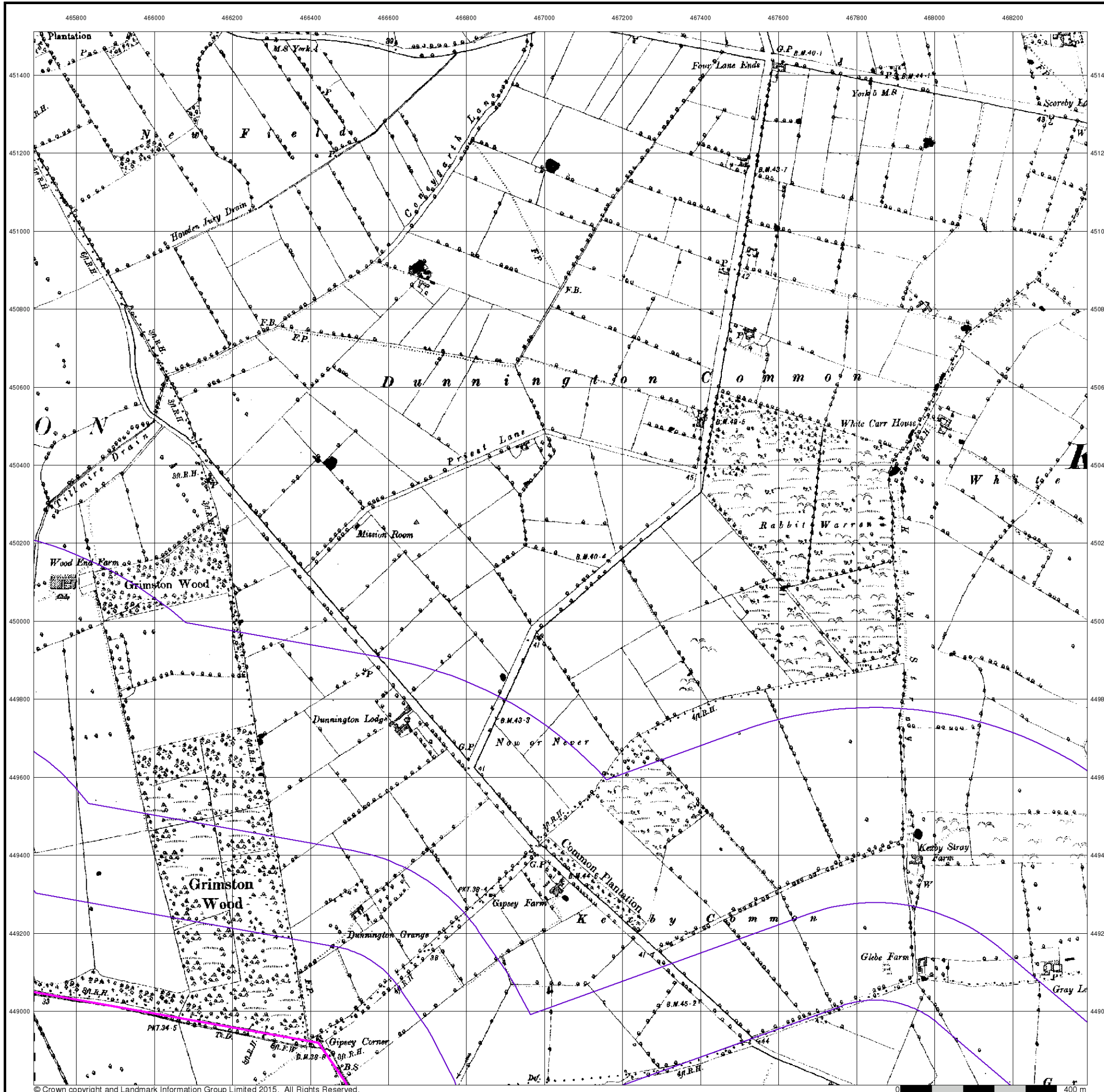
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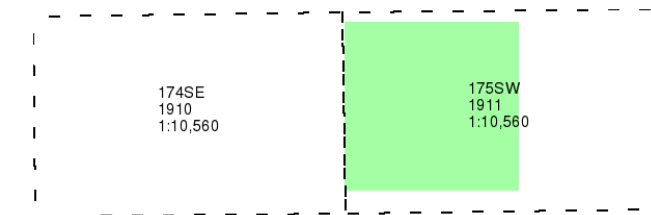
Yorkshire

Published 1910 - 1911

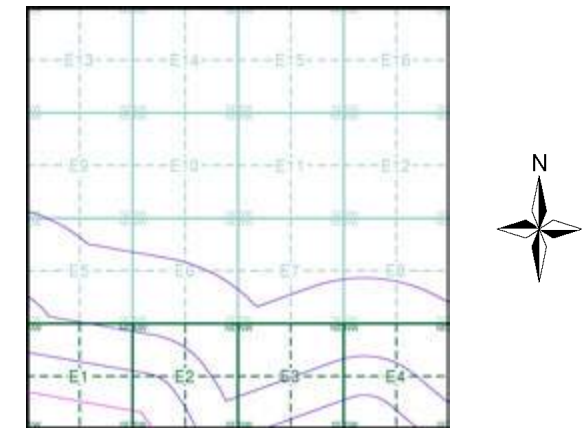
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice E



Order Details

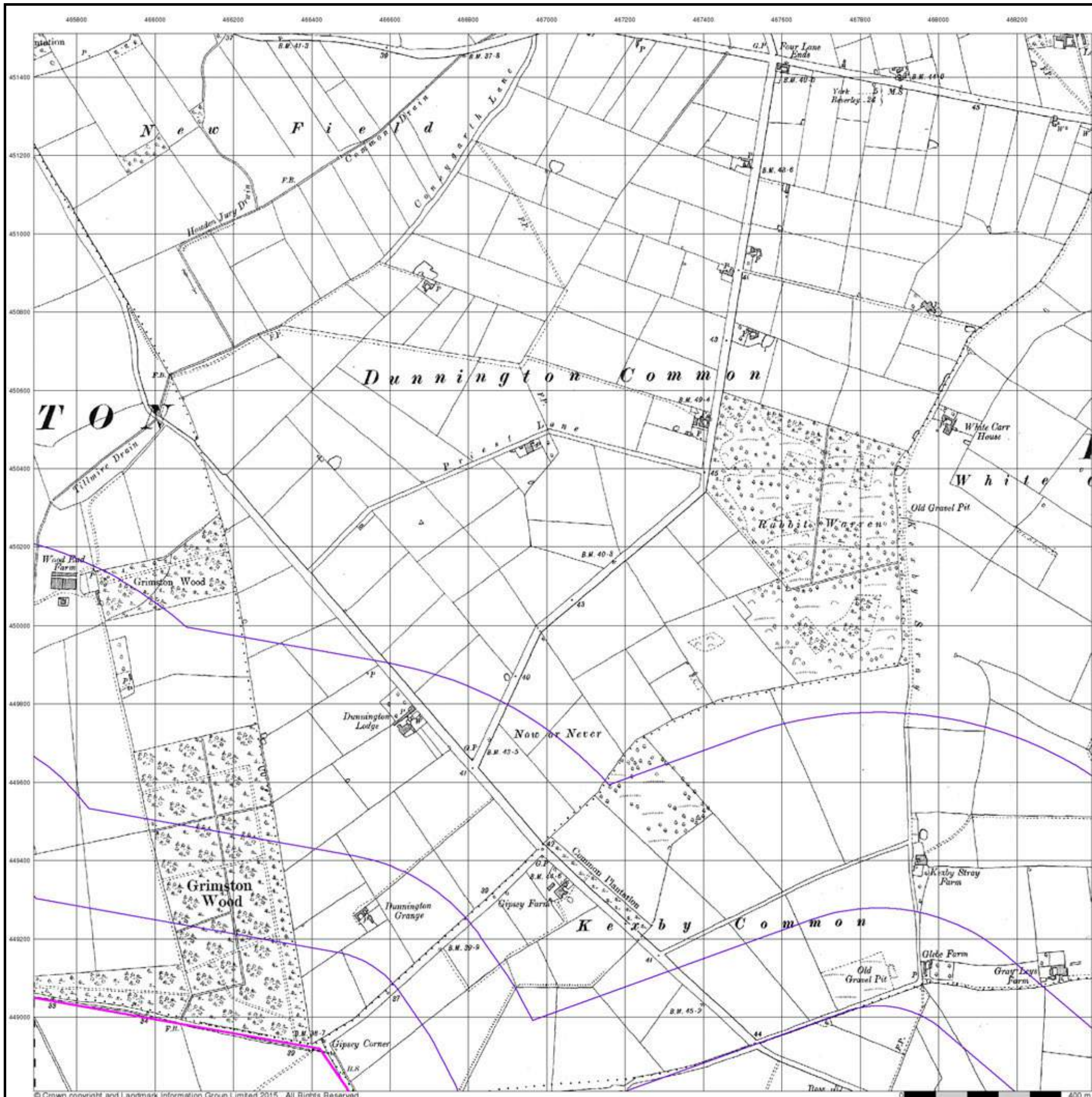
Order Number: 95641417_1_1
Customer Ref: 70011808-701
National Grid Reference: 466940, 449330
Slice: E
Site Area (Ha): 246.75
Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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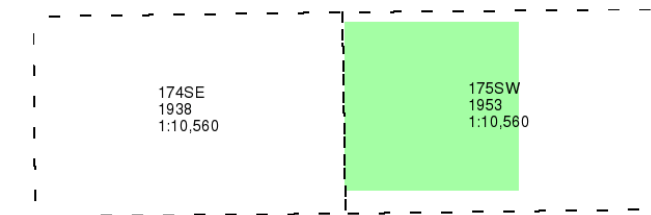
Yorkshire

Published 1938 - 1953

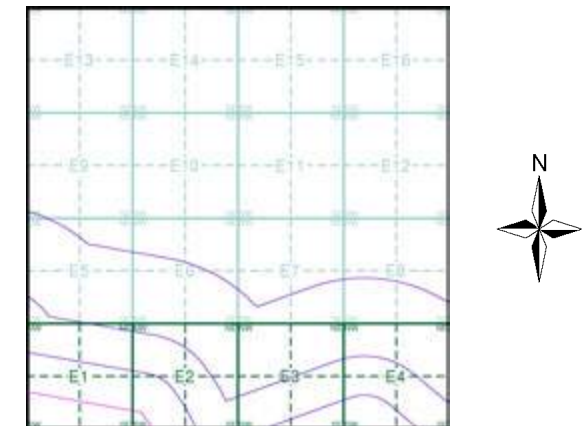
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice E



Order Details

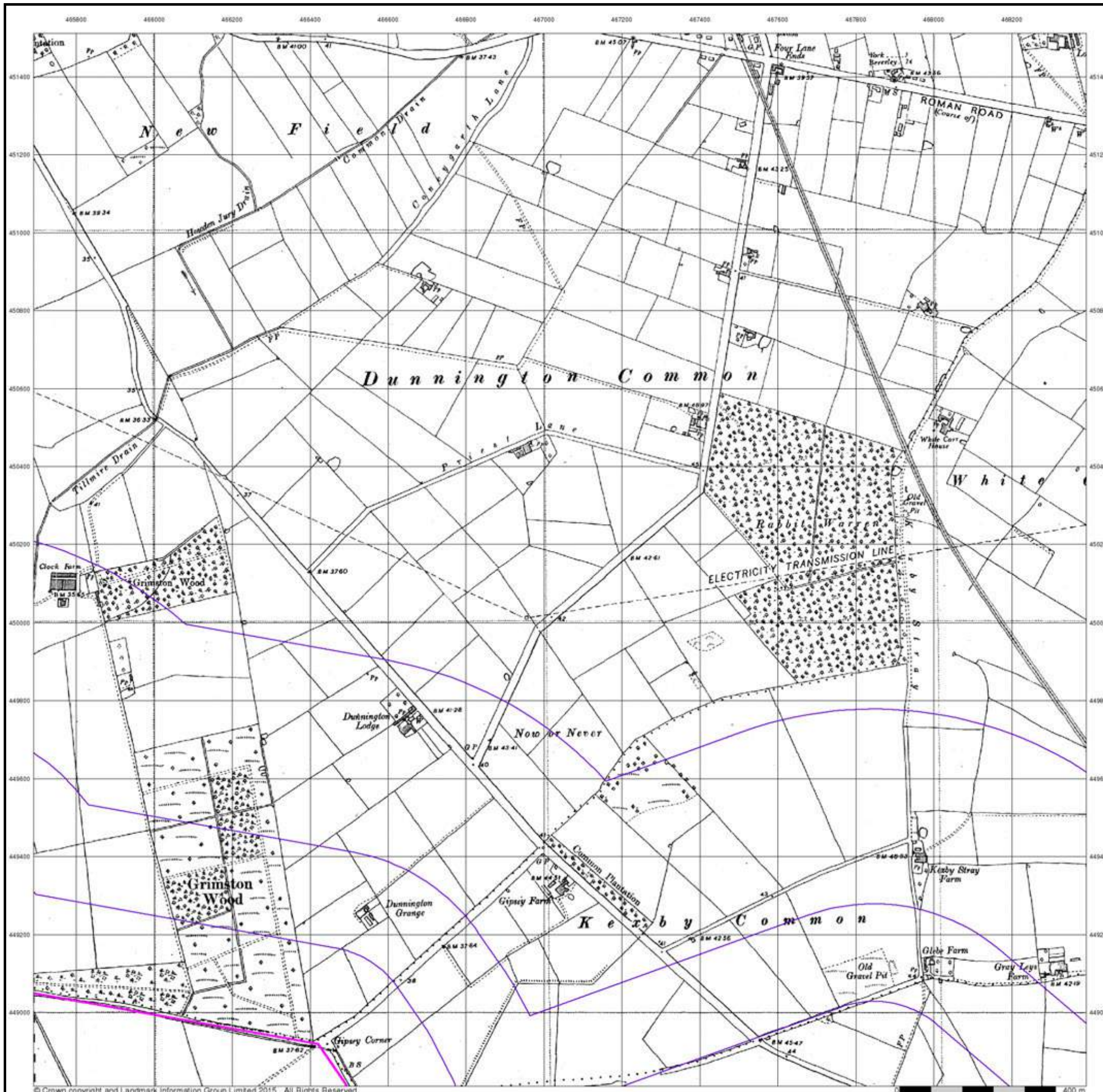
Order Number: 95641417_1_1
Customer Ref: 70011808-701
National Grid Reference: 466940, 449330
Slice: E
Site Area (Ha): 246.75
Search Buffer (m): 1000

Site Details

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Ordnance Survey Plan

Published 1958

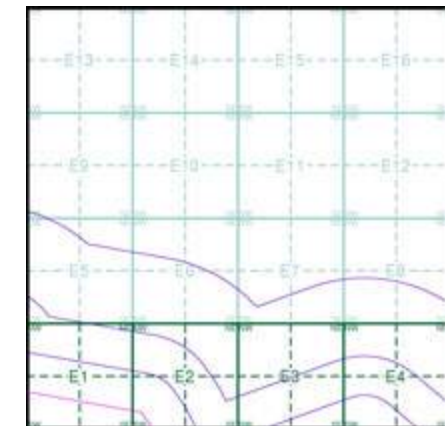
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

- SE65SE | 1958 | 1:10,560
- SE64NE | 1958 | 1:10,560

Historical Map - Slice E



Order Details

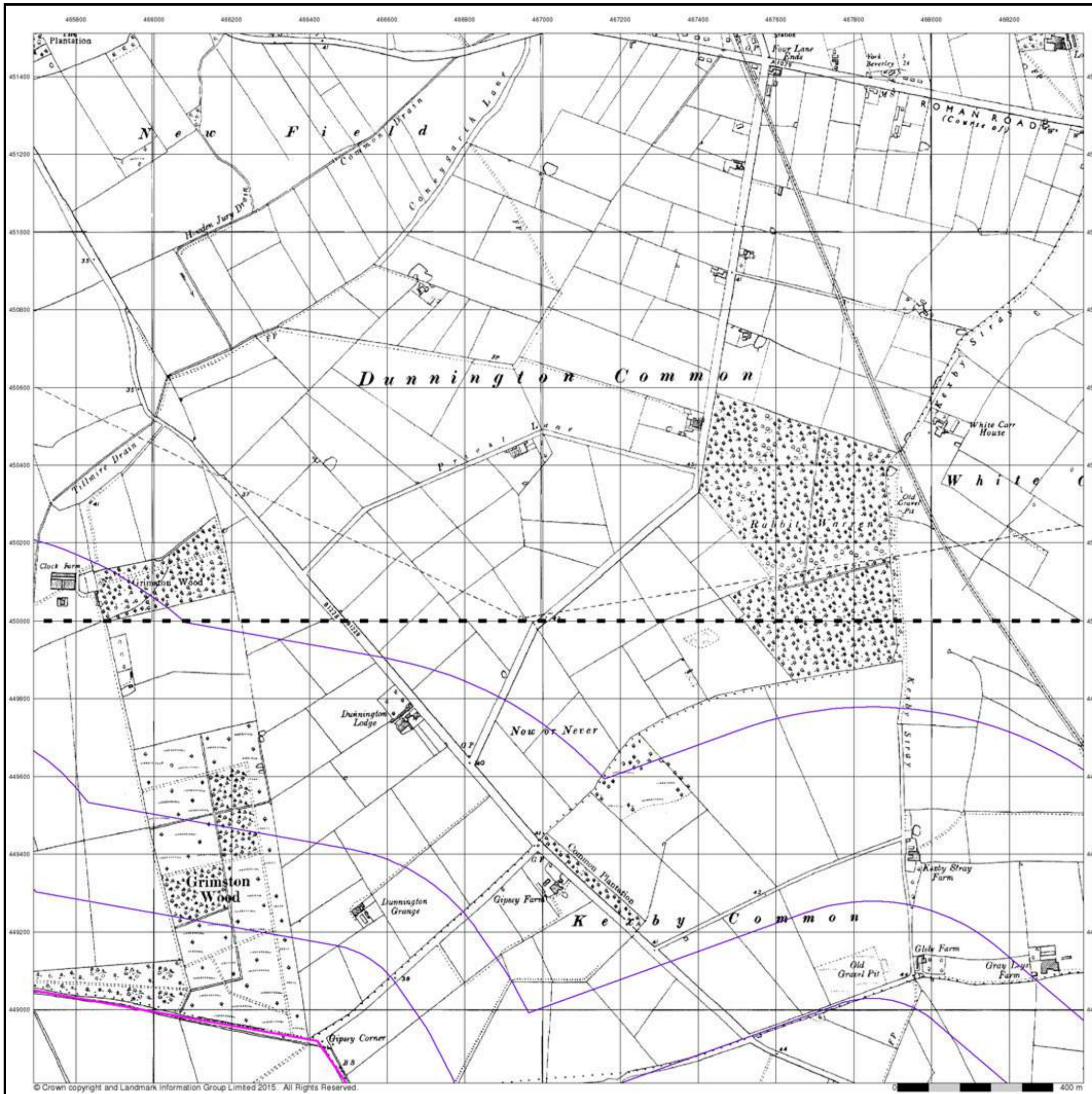
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 466940, 449330
 Slice: E
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

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Ordnance Survey Plan

Published 1971 - 1972

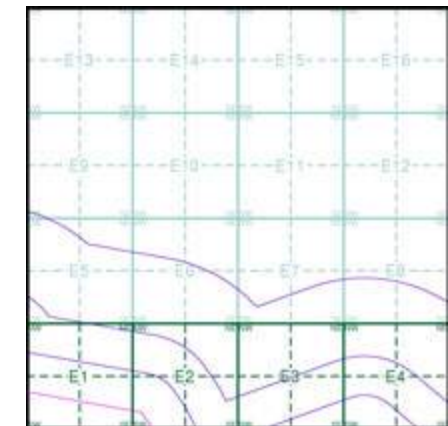
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

SE65SE
1971
1:10,000
SE64NE
1972
1:10,000

Historical Map - Slice E



Order Details

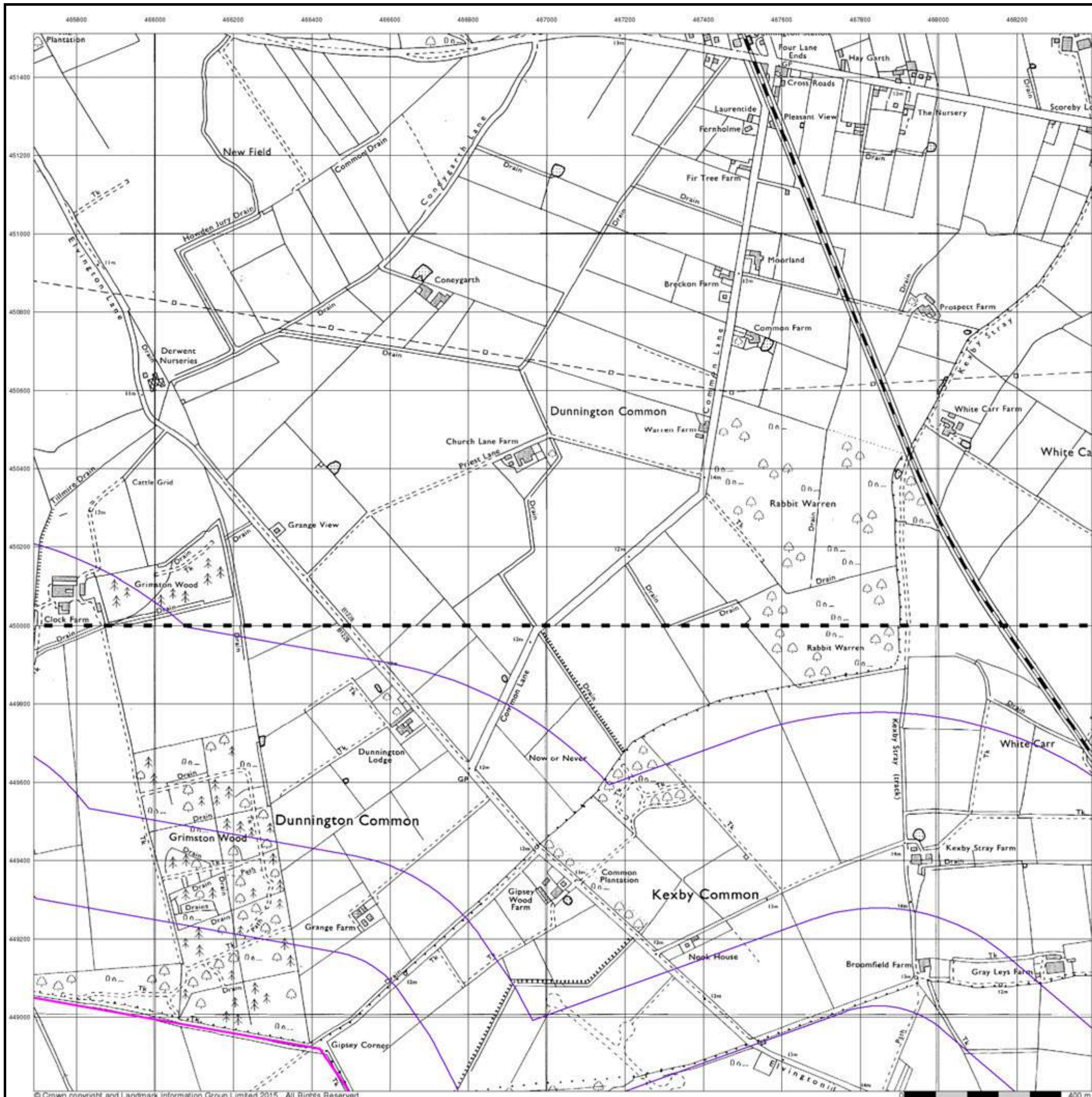
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 466940, 449330
 Slice: E
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

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York

Published 1980

Source map scale - 1:10,000

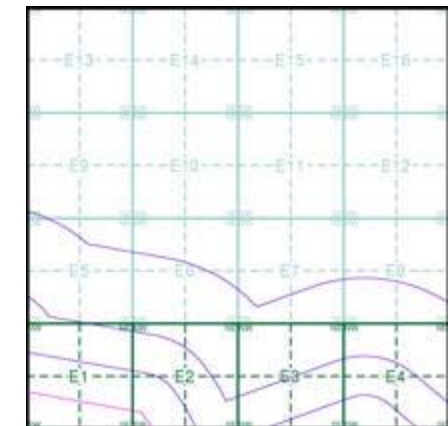
These maps were produced by the Russian military during the Cold War between 1950 and 1997, and cover 103 towns and cities throughout the U.K. The maps are produced at 1:25,000, 1:10,000 and 1:5,000 scale, and show detailed land use, with colour-coded areas for development, green areas, and non-developed areas. Buildings are coloured black and important building uses (such as hospitals, post offices, factories etc.) are numbered, with a numbered key describing their use.

They were produced by the Russians for the benefit of navigation, as well as strategic military sites and transport hubs, for use if they were to have invaded the U.K. The detailed information provided indicates that the areas were surveyed using land-based personnel, on the ground, in the cities that are mapped.

Map Name(s) and Date(s)

SE65SE
1980
1:10,000
SE64NE
1980
1:10,000

Russian Map - Slice E



Order Details

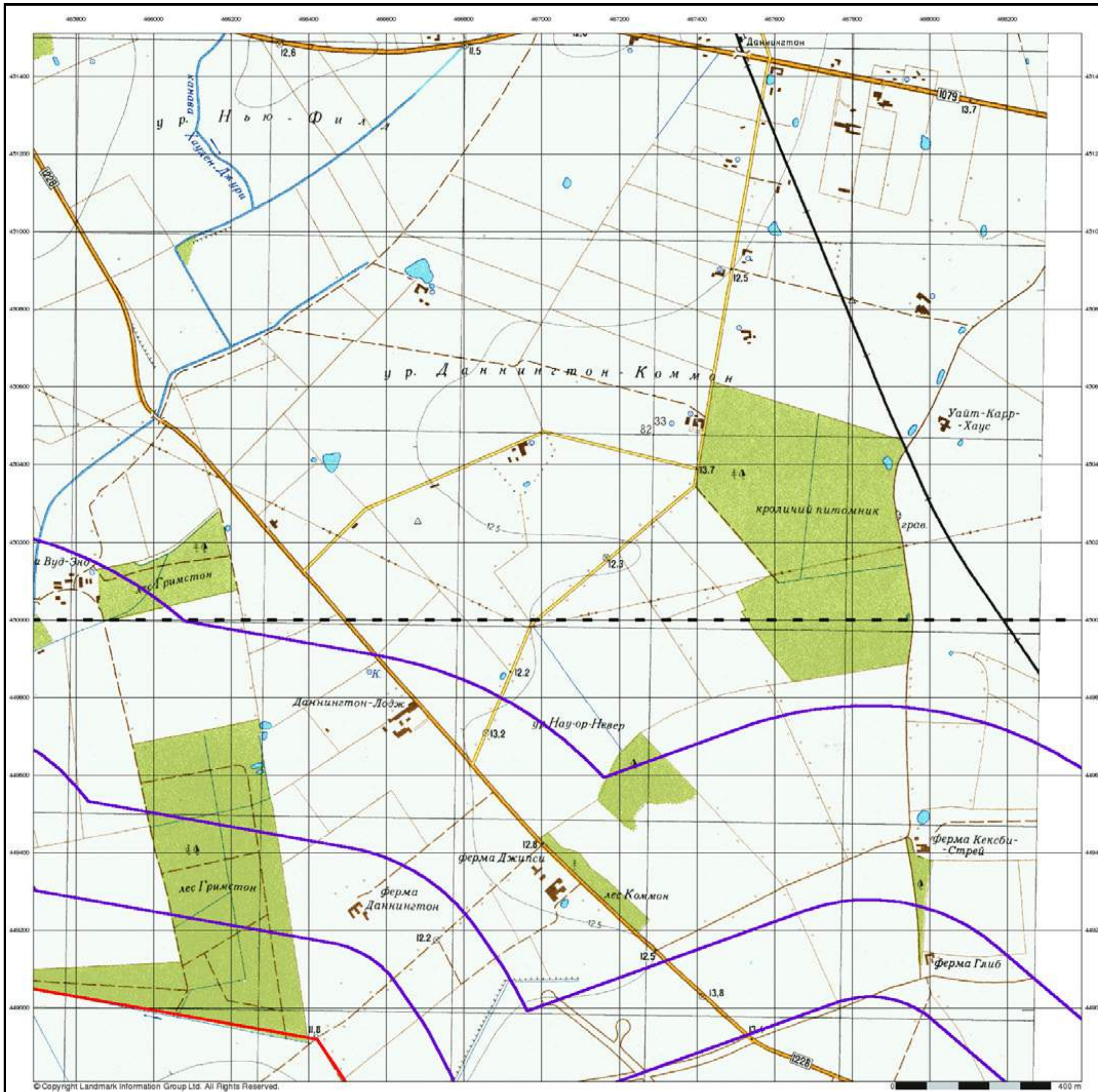
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 466940, 449330
 Slice: E
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

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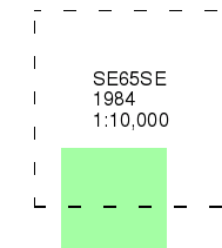
Ordnance Survey Plan

Published 1984

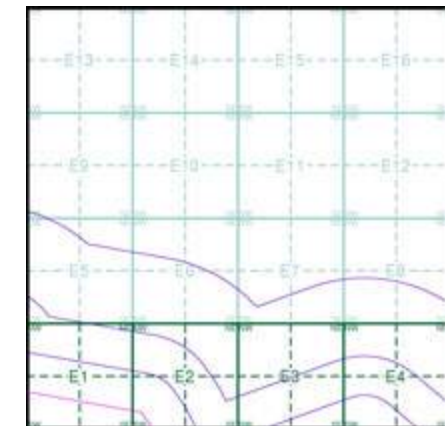
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice E



Order Details

Order Number: 95641417_1_1
Customer Ref: 70011808-701
National Grid Reference: 466940, 449330
Slice: E
Site Area (Ha): 246.75
Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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10k Raster Mapping

Published 1999

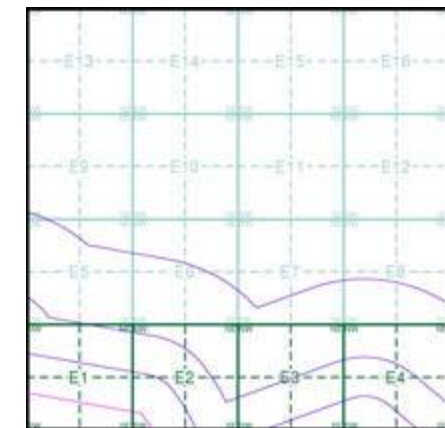
Source map scale - 1:10,000

The historical maps shown were produced from the Ordnance Survey's 1:10,000 colour raster mapping. These maps are derived from Landplan which replaced the old 1:10,000 maps originally published in 1970. The data is highly detailed showing buildings, fences and field boundaries as well as all roads, tracks and paths. Road names are also included together with the relevant road number and classification. Boundary information depiction includes county, unitary authority, district, civil parish and constituency.

Map Name(s) and Date(s)

SE65SE
1999
1:10,000
SE64NE
1999
1:10,000

Historical Map - Slice E



Order Details

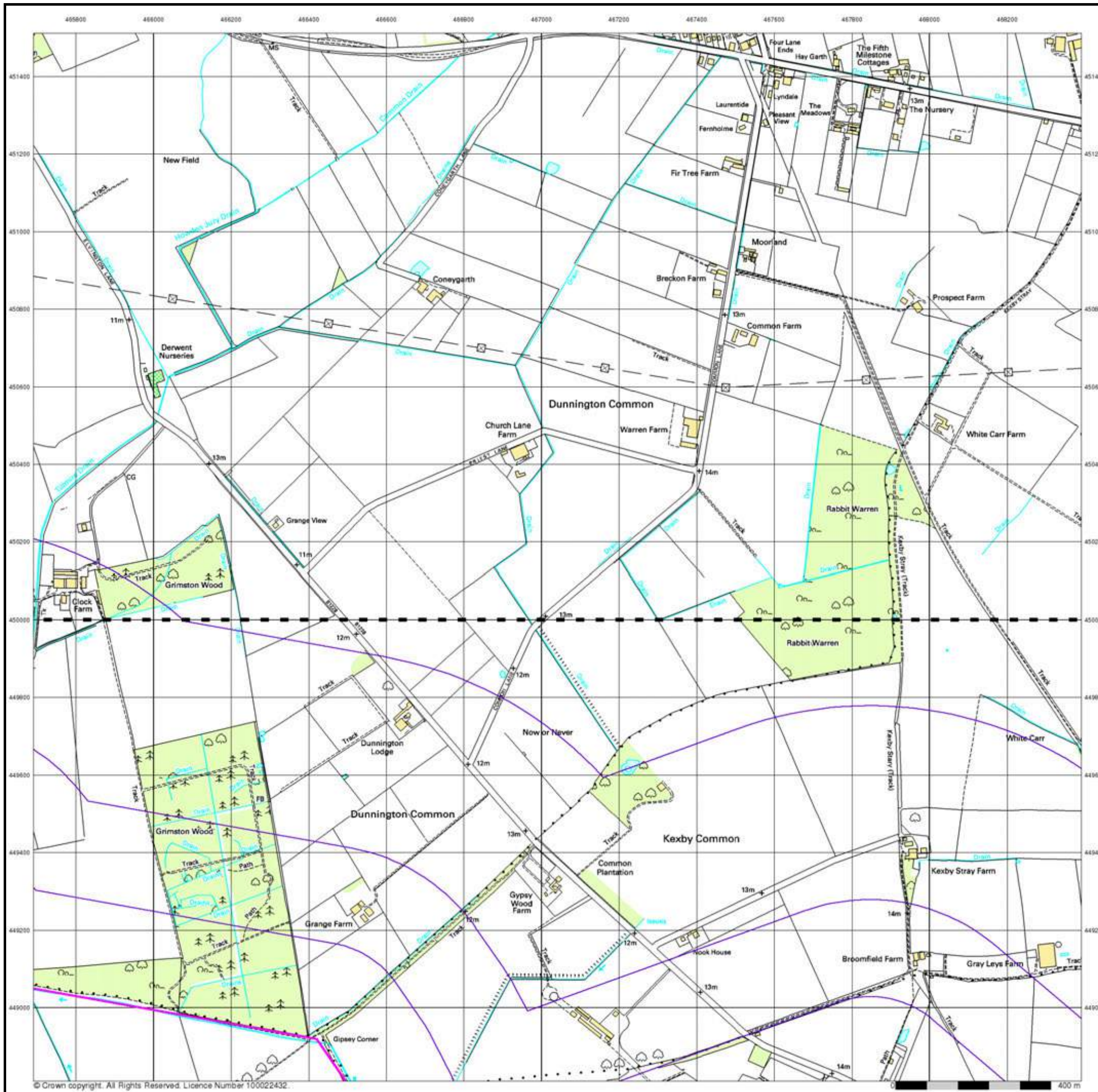
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 466940, 449330
 Slice: E
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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10k Raster Mapping

Published 2006

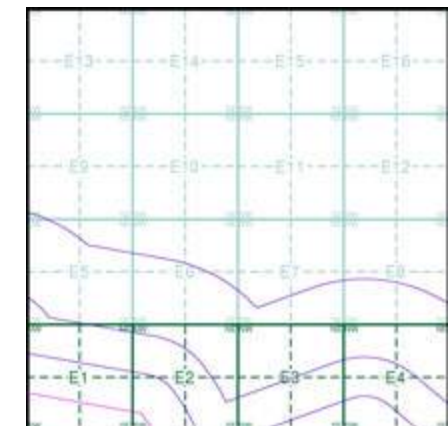
Source map scale - 1:10,000

The historical maps shown were produced from the Ordnance Survey's 1:10,000 colour raster mapping. These maps are derived from Landplan which replaced the old 1:10,000 maps originally published in 1970. The data is highly detailed showing buildings, fences and field boundaries as well as all roads, tracks and paths. Road names are also included together with the relevant road number and classification. Boundary information depiction includes county, unitary authority, district, civil parish and constituency.

Map Name(s) and Date(s)

SE65SE
2006
1:10,000
SE64NE
2006
1:10,000

Historical Map - Slice E



Order Details

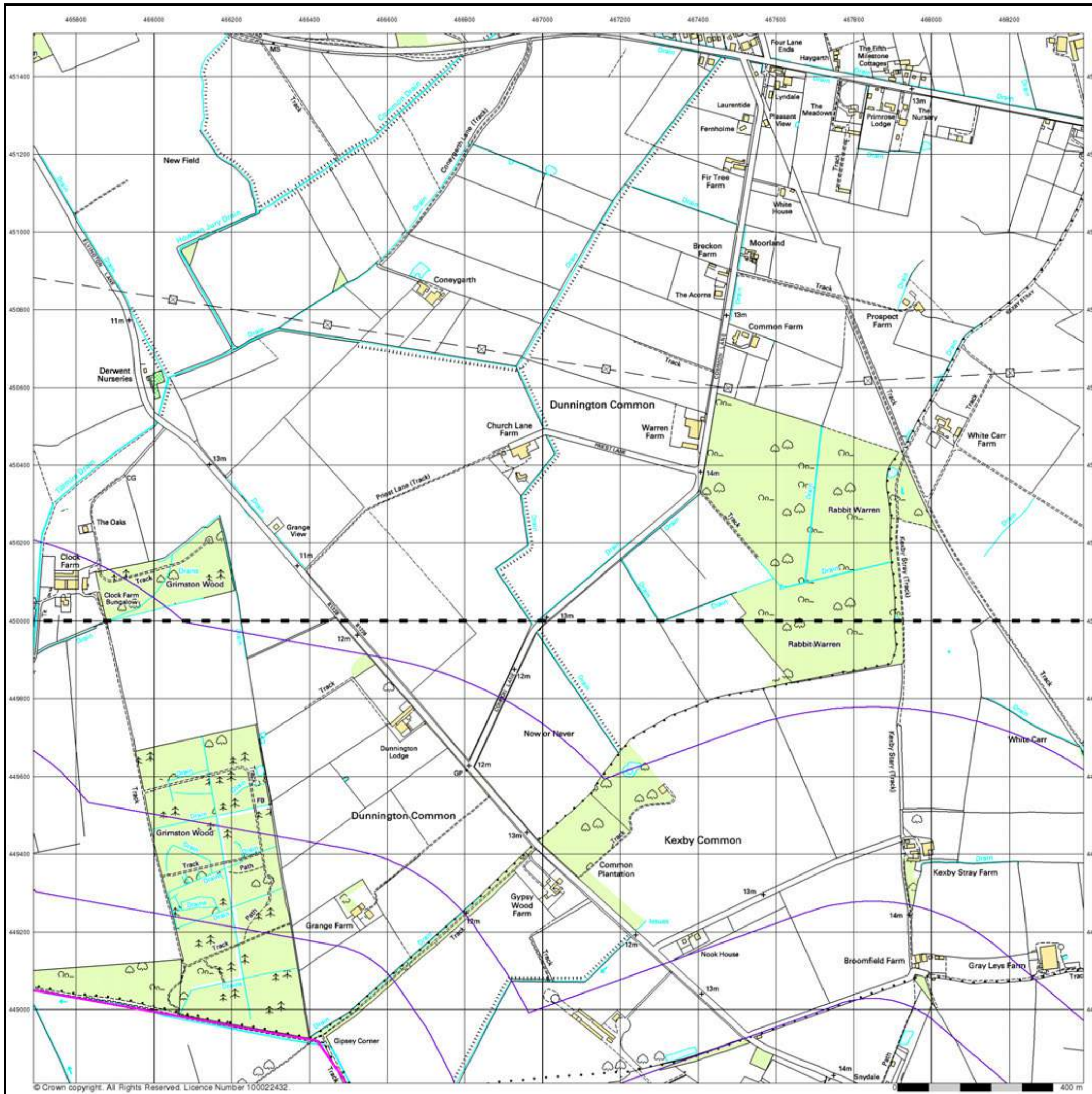
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 466940, 449330
 Slice: E
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

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VectorMap Local

Published 2016

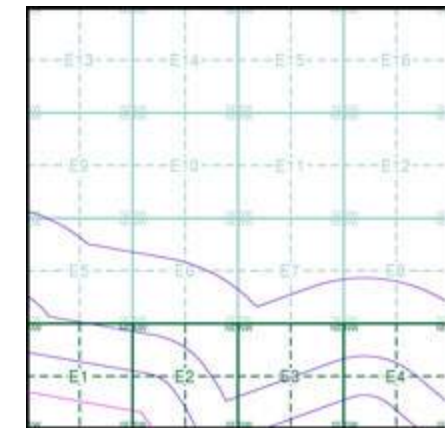
Source map scale - 1:10,000

VectorMap Local (Raster) is Ordnance Survey's highest detailed 'backdrop' mapping product. These maps are produced from OS's VectorMap Local, a simple vector dataset at a nominal scale of 1:10,000, covering the whole of Great Britain, that has been designed for creating graphical mapping. OS VectorMap Local is derived from large-scale information surveyed at 1:1250 scale (covering major towns and cities), 1:2500 scale (smaller towns, villages and developed rural areas), and 1:10 000 scale (mountain, moorland and river estuary areas).

Map Name(s) and Date(s)

- SE65SE | 2016 | Variable
- SE64NE | 2016 | Variable

Historical Map - Slice E



Order Details

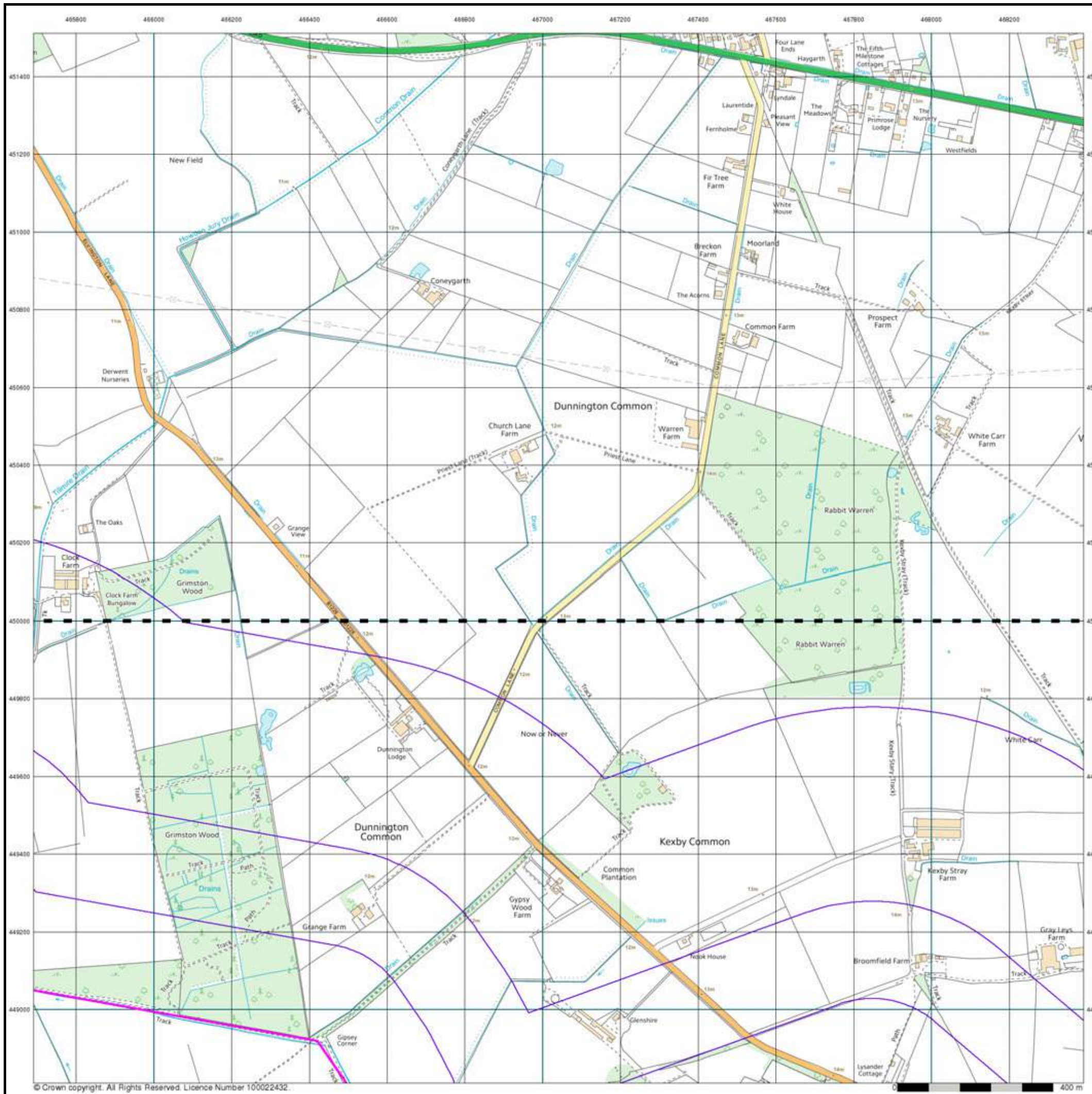
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
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 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



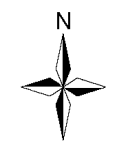
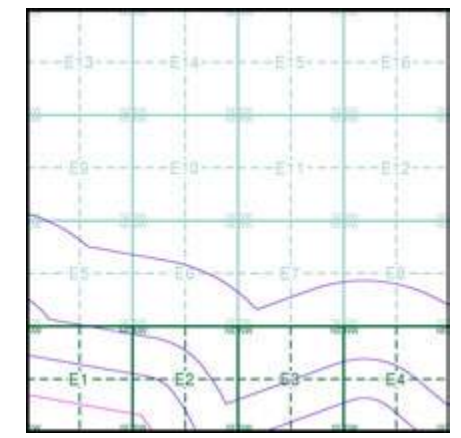
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- General**
- Specified Site
 - Specified Buffer(s)
 - Bearing Reference Point
 - Map ID
- Agency and Hydrological**
- Contaminated Land Register Entry or Notice (Location)
 - Contaminated Land Register Entry or Notice (Location)
 - Discharge Consent
 - Enforcement or Prohibition Notice
 - Integrated Pollution Control
 - Integrated Pollution Prevention Control
 - Local Authority Integrated Pollution Prevention and Control
 - Local Authority Pollution Prevention and Control
 - Local Authority Pollution Prevention and Control Enforcement
 - Pollution Incident to Controlled Waters
 - Prosecution Relating to Authorised Processes
 - Prosecution Relating to Controlled Waters
 - Registered Radioactive Substance
 - River Network or Water Feature
 - River Quality Sampling Point
 - Substantiated Pollution Incident Register
 - Water Abstraction
 - Water Industry Act Referral
- Waste**
- BGS Recorded Landfill Site (Location)
 - BGS Recorded Landfill Site (Location)
 - EA Historic Landfill (Buffered Point)
 - EA Historic Landfill (Polygon)
 - Integrated Pollution Control Registered Waste Site
 - Licensed Waste Management Facility (Landfill Boundary)
 - Licensed Waste Management Facility (Location)
 - Local Authority Recorded Landfill Site (Location)
 - Local Authority Recorded Landfill Site
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Water)
 - Potentially Infilled Land (Water)
 - Potentially Infilled Land (Water)
 - Registered Landfill Site (Location)
 - Registered Landfill Site (Point Buffered to 100m)
 - Registered Landfill Site (Point Buffered to 250m)
 - Registered Waste Transfer Site (Location)
 - Registered Waste Transfer Site
 - Registered Waste Treatment or Disposal Site (Location)
 - Registered Waste Treatment or Disposal Site
- Hazardous Substances**
- COMAH Site
 - Explosive Site
 - NIHS Site
 - Planning Hazardous Substance Consent
 - Planning Hazardous Substance Enforcement
- Geological**
- BGS Recorded Mineral Site

Site Sensitivity Map - Slice E

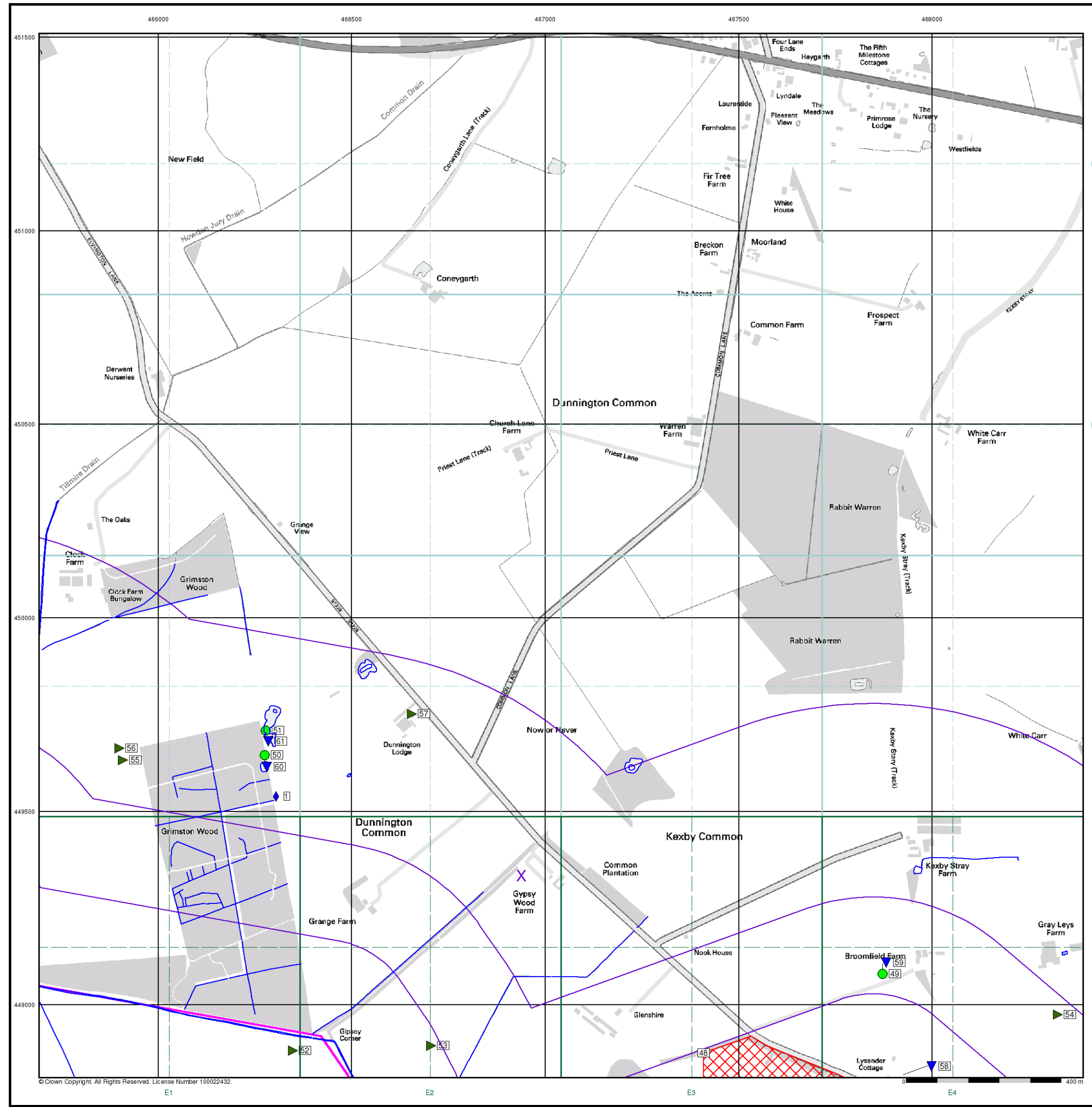


Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 466940, 449330
 Slice: E
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU





Industrial Land Use Map

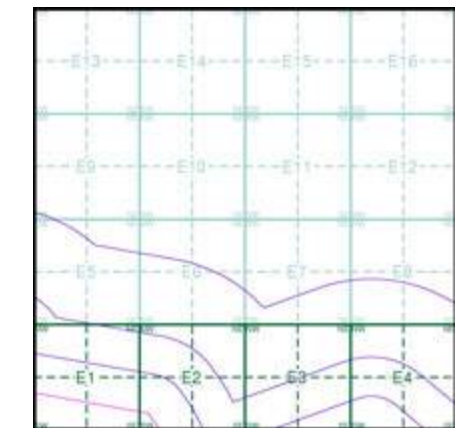
General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point
- Slice
- Map ID

Industrial Land Use

- Contemporary Trade Directory Entry
- Fuel Station Entry
- Gas Pipeline
- Points of Interest - Commercial Services
- Points of Interest - Education and Health
- Points of Interest - Manufacturing and Production
- Points of Interest - Public Infrastructure
- Points of Interest - Recreational and Environmental
- Underground Electrical Cables

Industrial Land Use Map - Slice E



Order Details

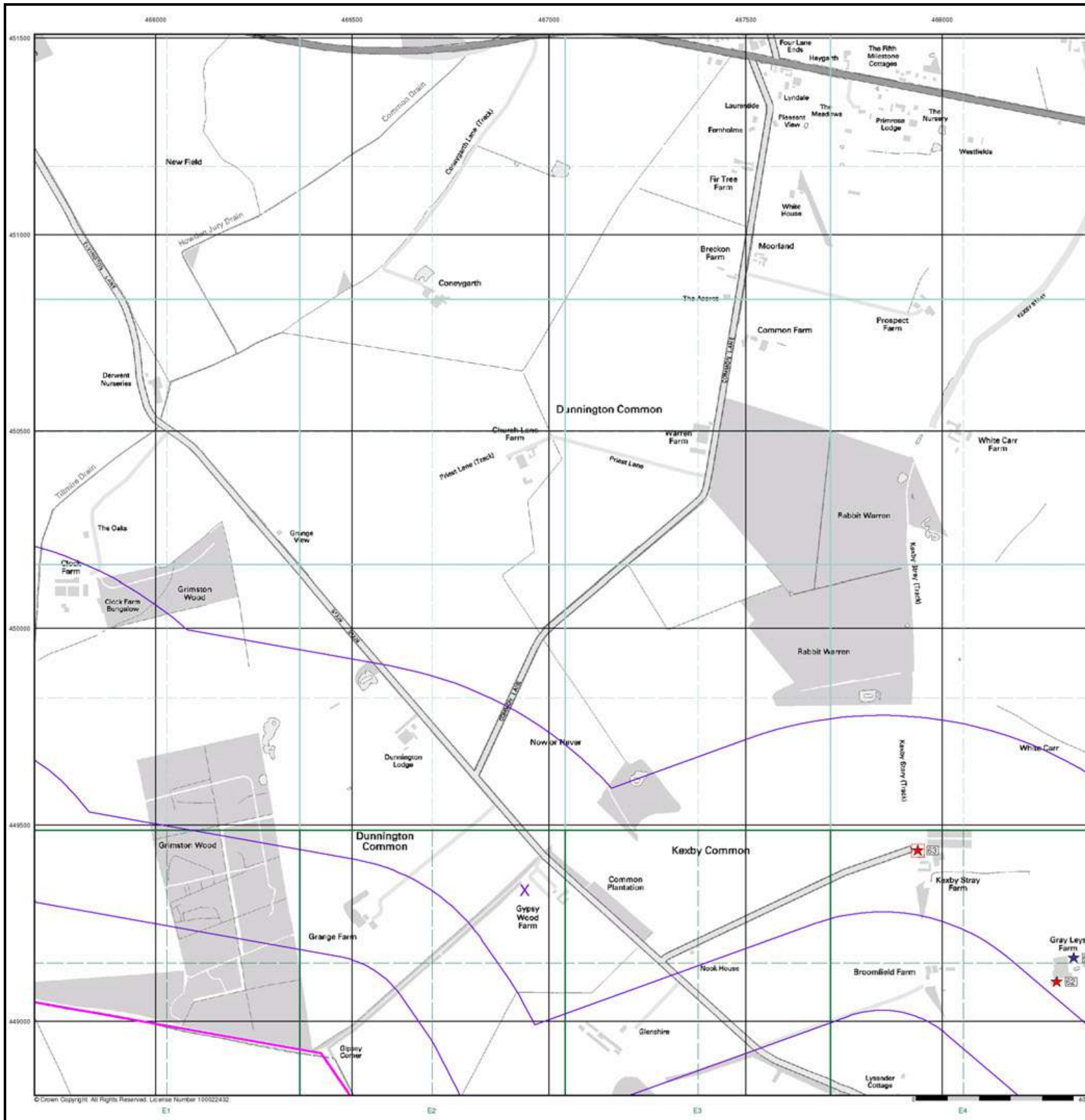
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 Slice: E
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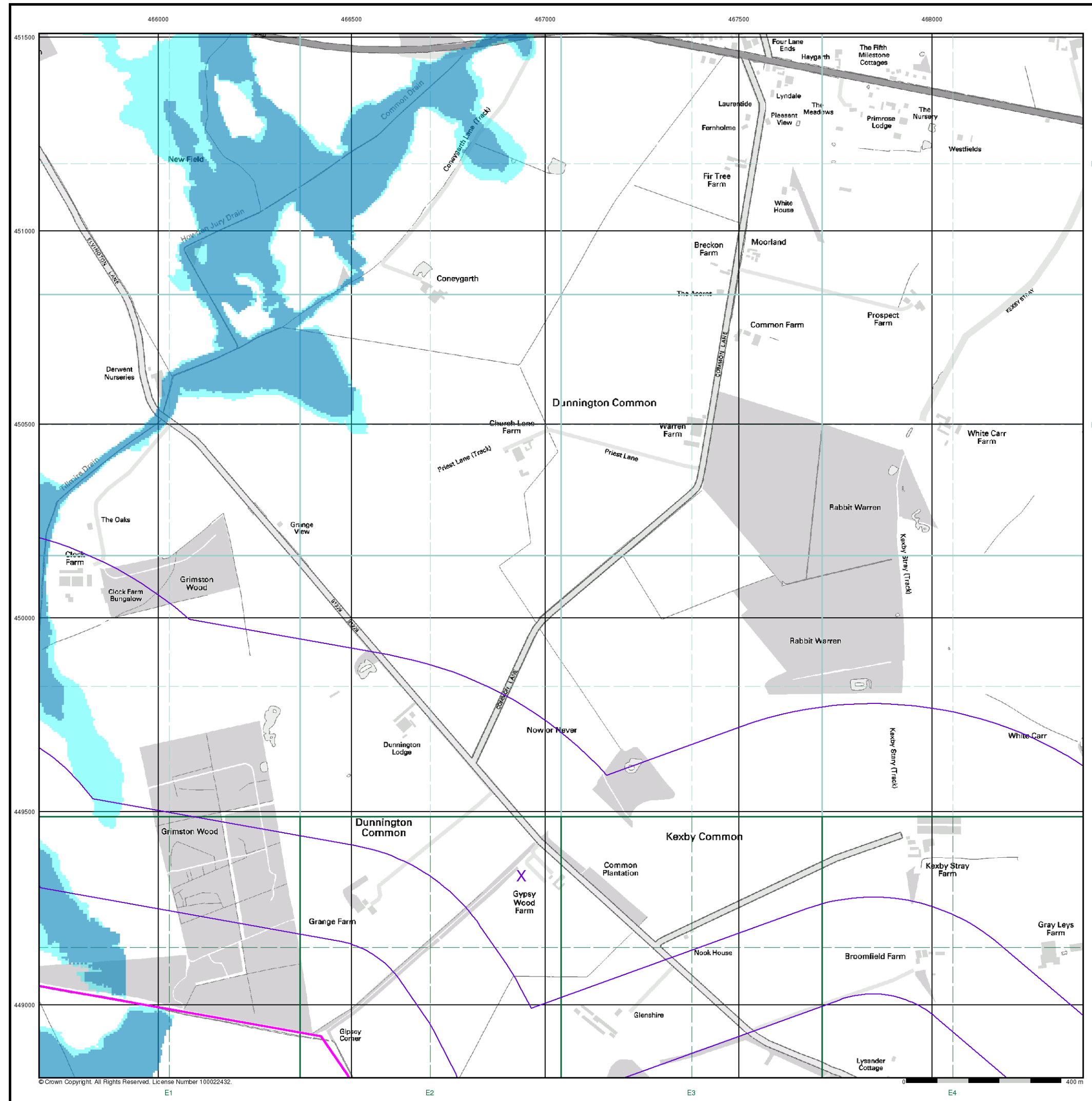
Site Details

Site off Elvington Lane, York, YO41 4AU





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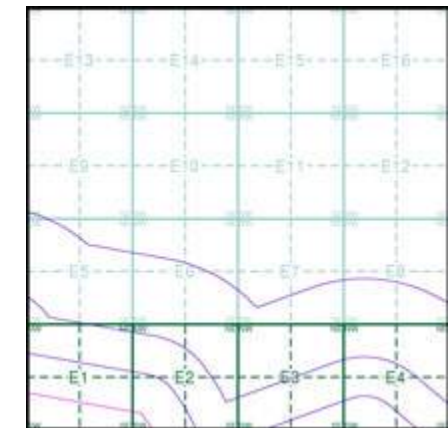
General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point

Agency and Hydrological (Flood)

-  Extreme Flooding from Rivers or Sea without Defences (Zone 2)
-  Flooding from Rivers or Sea without Defences (Zone 3)
-  Area Benefiting from Flood Defence
-  Flood Water Storage Areas
-  Flood Defence

Flood Map - Slice E








Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 466940, 449330
 Slice: E
 Site Area (Ha): 246.75
 Search Buffer (m): 1000






Site Details

Site off Elvington Lane, York, YO41 4AU

General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point
-  Map ID
-  Several of Type at Location

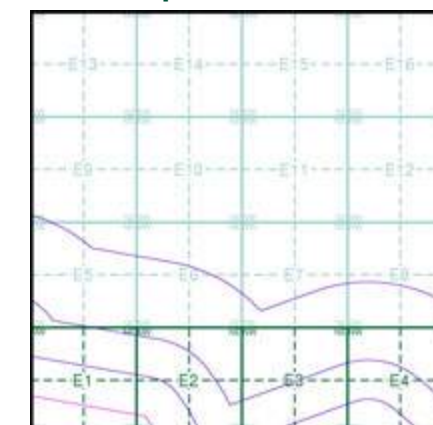
Agency and Hydrological (Boreholes)

-  BGS Borehole Depth 0 - 10m
-  BGS Borehole Depth 10 - 30m
-  BGS Borehole Depth 30m +
-  Confidential
-  Other

For Borehole information please refer to the Borehole .csv file which accompanied this slice.

A copy of the BGS Borehole Ordering Form is available to download from the Support section of www.envirocheck.co.uk.

Borehole Map - Slice E

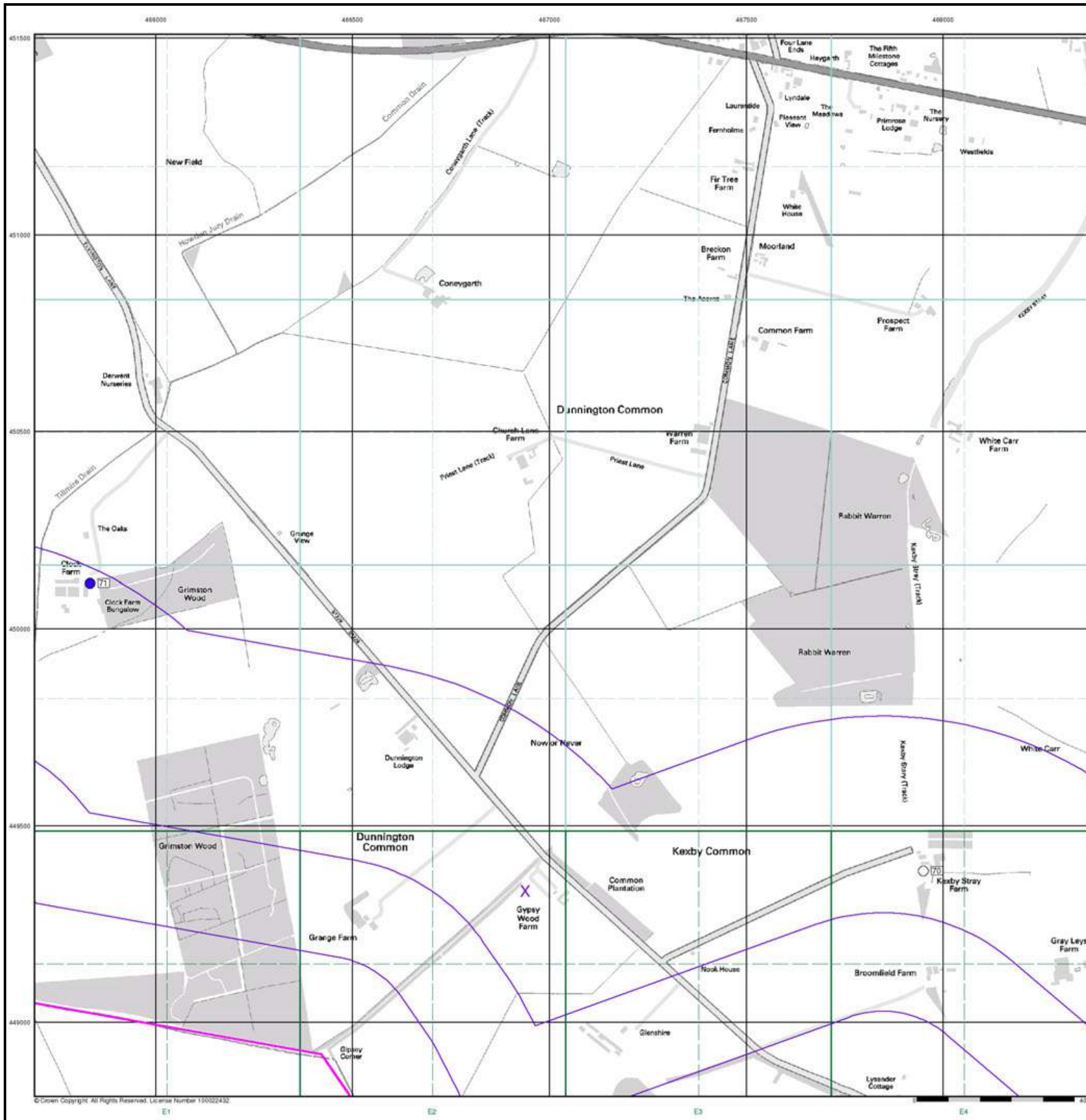


Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 466940, 449330
 Slice: E
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU





General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point
- Map ID

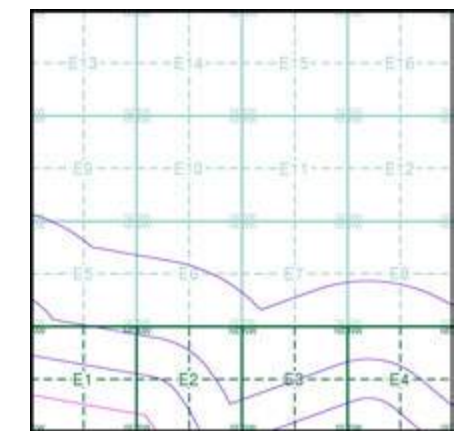
Detailed River Network Data

- Primary River
- Secondary River
- Tertiary River
- Canal
- Canal Tunnel
- Undefined River
- Lake/Reservoir
- Offline Drainage Feature
- Extended Culvert (greater than 50m)
- Underground River (inferred)
- Underground River (local knowledge)
- Downstream of High Water Mark
- Downstream of Seaward Extension
- Not assigned River feature

Contours (height in metres)

- Standard Contour 105
- Master Contour 100
- Spot Height 167.3
- MLW - Mean Low Water
- MHW - Mean High Water

E/NRW Detailed River Network Map - Slice E



Order Details

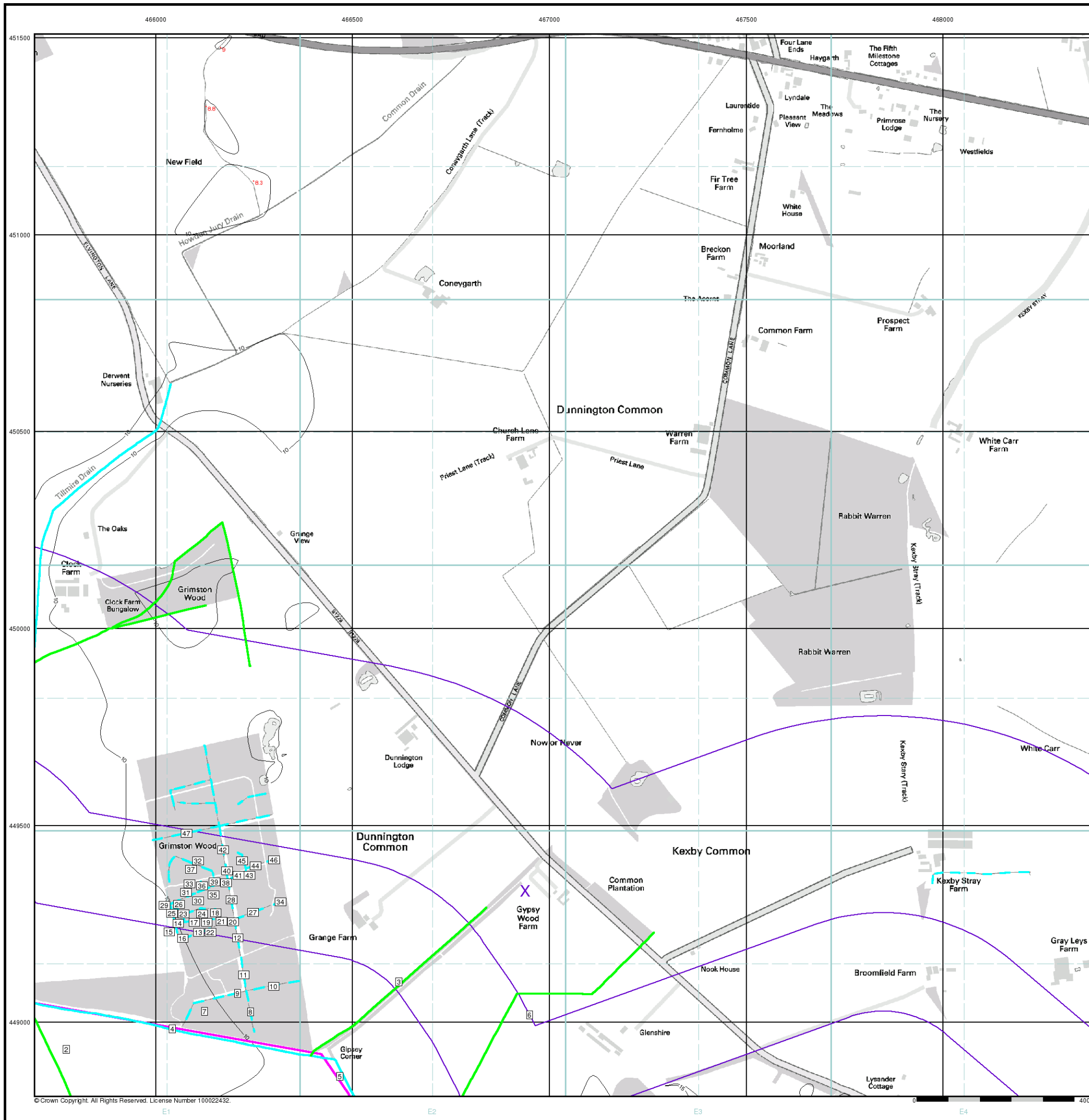
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 466940, 449330
 Slice: E
 Site Area (Ha): 246.75
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Site Details

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General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point

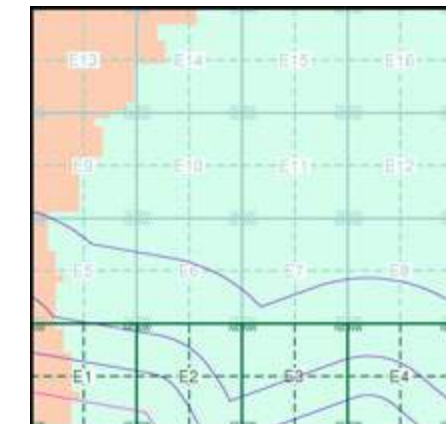
Risk of Flooding from Surface Water

-  High - 30 Year Return
-  Medium - 100 Year Return
-  Low - 1000 Year Return

Suitability

- See the suitability map below
-  National to county
 -  County to town
 -  Town to street
 -  Street to parcels of land
 -  Property

E/NRW Suitability Map - Slice E

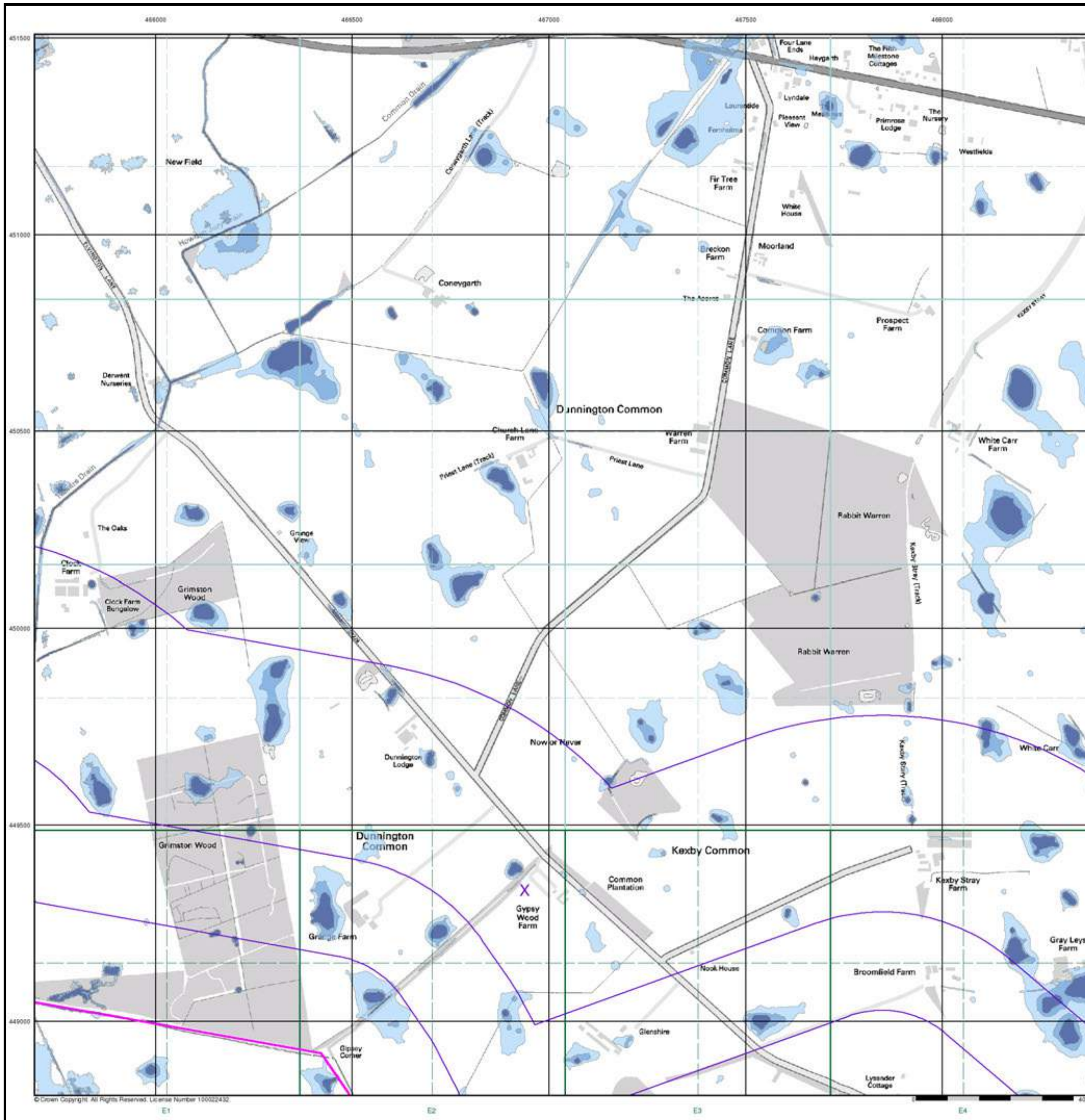


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Historical Mapping Legends

Ordnance Survey County Series 1:10,560

- Gravel Pit
- Sand Pit
- Other Pits
- Quarry
- Shingle
- Orchard
- Osiers
- Reeds
- Marsh
- Mixed Wood
- Deciduous
- Brushwood
- Fir
- Furze
- Rough Pasture
- Arrow denotes flow of water
- Trigonometrical Station
- Site of Antiquities
- Bench Mark
- Pump, Guide Post, Signal Post
- Well, Spring, Boundary Post
- 285** Surface Level
- Sketched Contour
- Instrumental Contour
- Main Roads
- Minor Roads
- Sunken Road
- Raised Road
- Road over Railway
- Railway over River
- Railway over Road
- Level Crossing
- Road over River or Canal
- Road over Stream
- Road over Stream
- County Boundary (Geographical)
- County & Civil Parish Boundary
- Administrative County & Civil Parish Boundary
- County Borough Boundary (England)
- County Burgh Boundary (Scotland)
- Rural District Boundary
- Civil Parish Boundary

Ordnance Survey Plan 1:10,000

- Chalk Pit, Clay Pit or Quarry
- Gravel Pit
- Sand Pit
- Disused Pit or Quarry
- Refuse or Slag Heap
- Lake, Loch or Pond
- Dunes
- Boulders
- Coniferous Trees
- Non-Coniferous Trees
- Orchard
- Scrub
- Coppice
- Bracken
- Heath
- Rough Grassland
- Marsh
- Reeds
- Saltings
- Building
- Glasshouse
- Sloping Masonry
- Pylon
- Electricity Transmission Line
- Pole
- Cutting
- Embankment
- Standard Gauge Multiple Track
- Standard Gauge Single Track
- Siding, Tramway or Mineral Line
- Narrow Gauge
- Geographical County
- Administrative County, County Borough or County of City
- Municipal Borough, Urban or Rural District, Burgh or District Council
- Borough, Burgh or County Constituency
- Civil Parish
- BP, BS Boundary Post or Stone
- Ch Church
- CH Club House
- F E Sta Fire Engine Station
- FB Foot Bridge
- Fn Fountain
- GP Guide Post
- MP Mile Post
- MS Mile Stone
- Pol Sta Police Station
- PO Post Office
- PC Public Convenience
- PH Public House
- SB Signal Box
- Spr Spring
- TCB Telephone Call Box
- TCP Telephone Call Post
- W Well

1:10,000 Raster Mapping

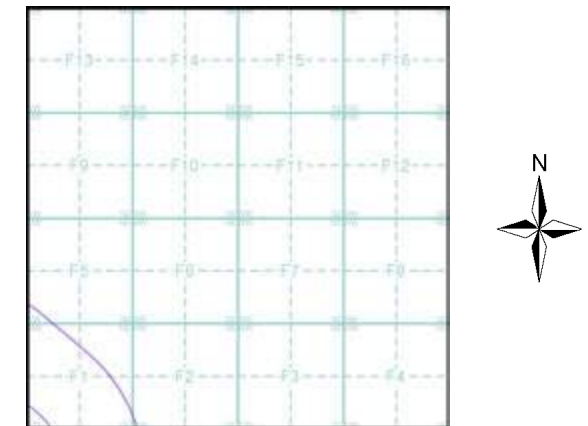
- Gravel Pit
- Rock
- Boulders
- Shingle
- Sand
- Slopes
- General detail
- Overhead detail
- Multi-track railway
- County boundary (England only)
- District, Unitary, Metropolitan, London Borough boundary
- Area of wooded vegetation
- Non-coniferous trees (scattered)
- Coniferous trees (scattered)
- Orchard
- Rough Grassland
- Scrub
- Water feature
- MHW(S) Mean high water (springs)
- Bench mark (where shown)
- Point feature (e.g. Guide Post or Mile Stone)
- Site of (antiquity)
- General Building
- Refuse tip or slag heap
- Rock (scattered)
- Boulders (scattered)
- Mud
- Sand Pit
- Top of cliff
- Underground detail
- Narrow gauge railway
- Single track railway
- Civil, parish or community boundary
- Constituency boundary
- Non-coniferous trees
- Coniferous trees
- Positioned tree
- Coppice or Osiers
- Heath
- Marsh, Salt Marsh or Reeds
- Flow arrows
- MLW(S) Mean low water (springs)
- Triangulation station
- Pylon, flare stack or lighting tower
- Glasshouse
- Important Building



Historical Mapping & Photography included:

Mapping Type	Scale	Date	Pg
Yorkshire	1:10,560	1854	3
Yorkshire	1:10,560	1893 - 1894	4
Yorkshire	1:10,560	1911	5
Yorkshire	1:10,560	1953	6
Ordnance Survey Plan	1:10,000	1958	7
Ordnance Survey Plan	1:10,000	1971 - 1972	8
York	1:10,000	1980	9
Ordnance Survey Plan	1:10,000	1984 - 1986	10
10K Raster Mapping	1:10,000	1999	11
10K Raster Mapping	1:10,000	2006	12
VectorMap Local	1:10,000	2016	13

Historical Map - Slice F



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468660, 449100
 Slice: F
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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 Fax: 0844 844 9951
 Web: www.envirocheck.co.uk

Russian Military Mapping Legends

1:5,000 and 1:10,000 mapping

a. Not drawn to scale b. Drawn to scale

- Government and Administrative Buildings
- Military and Industrial Buildings
- Military and Communication Areas
- Subway Entrance
- Fireproof Building
- Prominent Fireproof Building
- Non-fireproof Building
- Non-fireproof Building (non-dwelling)
- Factory, mill, and flour mill, with chimneys
- Factory, mill, and flour mill, without chimneys
- Power Station, drawn to scale
- Hydroelectric Power Station
- Radio Station, drawn to scale
- Telephone Station, drawn to scale
- Abandoned Open-pit Mine or Quarry
- Open-pit Salt Mine
- Pit
- Oil Deposit or Well
- Oil Seepage
- Tailings Pile
- Fuel Storage Tanks
- Natural Gas Tank
- Bench Mark
- Drill Hole
- Burial Mound
- Triangulation Point on Burial Mound
- Single-track Railroad
- Double-track Railroad and Station Building
- Coniferous Forest
- Deciduous Forest
- Mixed Forest
- Lawns
- Citrus Orchard
- Wet Ground
- Scattered Vegetation

243,8 Values for prominent elevations
 186.0 Numbers for spot elevations, depth soundings, contour lines, etc.
 0.2 Velocity of the current, width of river bed, depth of river
 180/12 Fractional terms: length and capacity of bridges; depth of fords and condition of the river bottom; height of forest and the diameter of trees

Russian Alphabet (For reference and phonetic interpretation of map text)

А а (A)	З з (Z)	П п (P)	Ч ч (CH)
Б б (B)	И и (I)	Р р (R)	Ш ш (SH)
В в (V)	Й й (Y)	С с (S)	Щ щ (SHCH)
Г г (G)	К к (K)	Т т (T)	Ъ (-)
Д д (D)	Л л (L)	У у (U)	Ы (Y)
Е е (E)	М м (M)	Ф ф (F)	Ь (')
Ё ё (YO)	Н н (N)	Х х (KH)	Э э (E)
Ж ж (ZH)	О о (O)	Ц ц (TS)	Ю ю (YU or IU)
			Я я (YA or IA)

1:25,000 mapping

a. Not drawn to scale b. Drawn to scale

- Government and Administrative Buildings
- Military and Industrial Buildings
- Military and Communication Areas
- Subway Entrance
- Partly Demolished Buildings
- Demolished Buildings
- Built-Up Area with Fireproof Buildings Predominant
- Built-Up Area with Non-Fireproof Buildings Predominant
- Individual Fireproof Building
- Prominent Industrial Building
- Individual Dwelling, Fireproof
- Ruins of an Individual Dwelling
- Factory or Mill Chimney
- Factory or Mill with Chimney
- Factory or Mill without Chimney
- Mine or Open Pit Mine
- Operating Shaft or Mine
- Non-Operating Shaft or Mine
- Salt Mine
- Tailings Pile
- Pit
- Stone Quarry
- Gas Pump or Service Station
- Fuel Storage or Natural Gas Tank
- Oil or Natural Gas Derrick
- Small Hydroelectric Power Station
- Power Station
- Transformer Station
- Cemetery
- Burial Mound (height in metres)
- Triangulation Point on Burial Mound
- Triangulation Point
- Bench Mark
- Bench Mark (monumented)
- Telegraph Office
- Telephone Station
- Radio Station
- Radio Tower
- Airfield or Seaplane Base
- Landing Strip
- Small Bridge
- Pipe (Culvert)
- Tunnel
- Dismantled Railroad
- Double-track Railroad with First Class Station
- Railroad Under Construction
- Shore Embankment
- River or Ditch with Embankment
- Water Reservoir or Rain Water Pit
- Spring
- Isobath with value
- Well
- Water Reservoir or Rain Water Pit
- Spring
- Isobath with value
- Heavy (Index) Contour Line
- Contour Line and Value
- Half Contour Line
- Spot Elevation Value
- Coniferous
- Deciduous
- Mixed
- Scrub

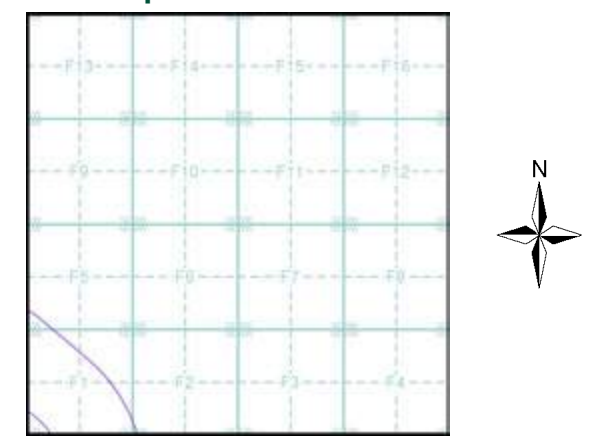
Key to Numbers on Mapping



Historical Mapping & Photography included:

Mapping Type	Scale	Date	Pg
Yorkshire	1:10,560	1854	3
Yorkshire	1:10,560	1893 - 1894	4
Yorkshire	1:10,560	1911	5
Yorkshire	1:10,560	1953	6
Ordnance Survey Plan	1:10,000	1958	7
Ordnance Survey Plan	1:10,000	1971 - 1972	8
York	1:10,000	1980	9
Ordnance Survey Plan	1:10,000	1984 - 1986	10
10K Raster Mapping	1:10,000	1999	11
10K Raster Mapping	1:10,000	2006	12
VectorMap Local	1:10,000	2016	13

Russian Map - Slice F



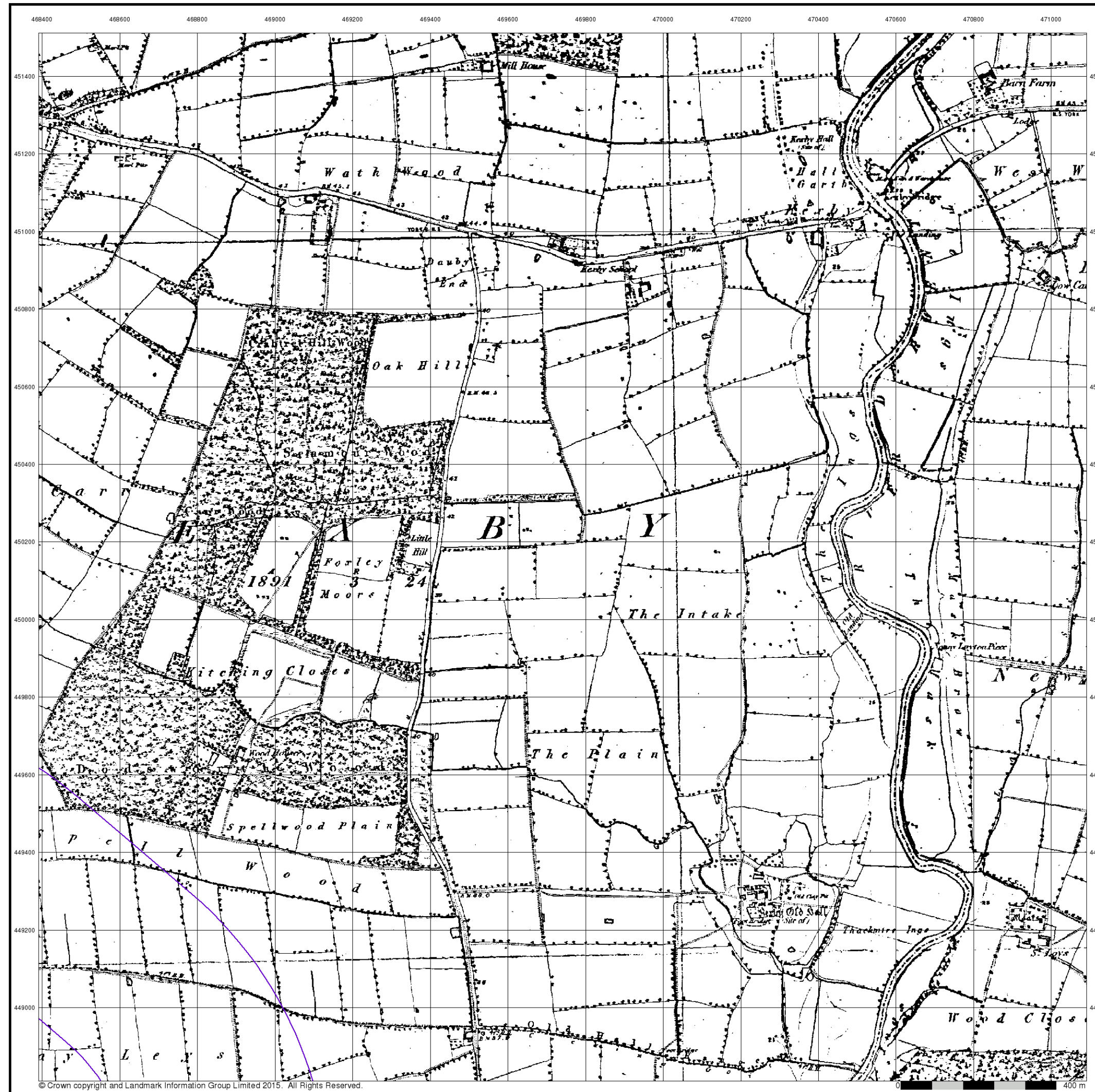
Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468660, 449100
 Slice: F
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU

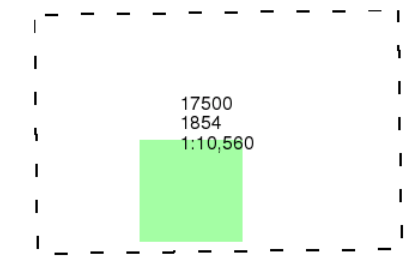
Landmark Information Group
 Tel: 0844 844 9952
 Fax: 0844 844 9951
 Web: www.envirocheck.co.uk



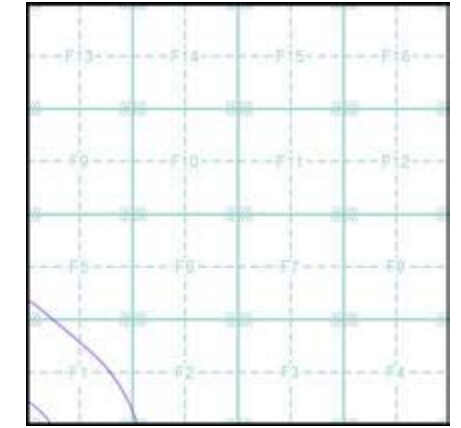
Yorkshire
Published 1854
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice F



Order Details

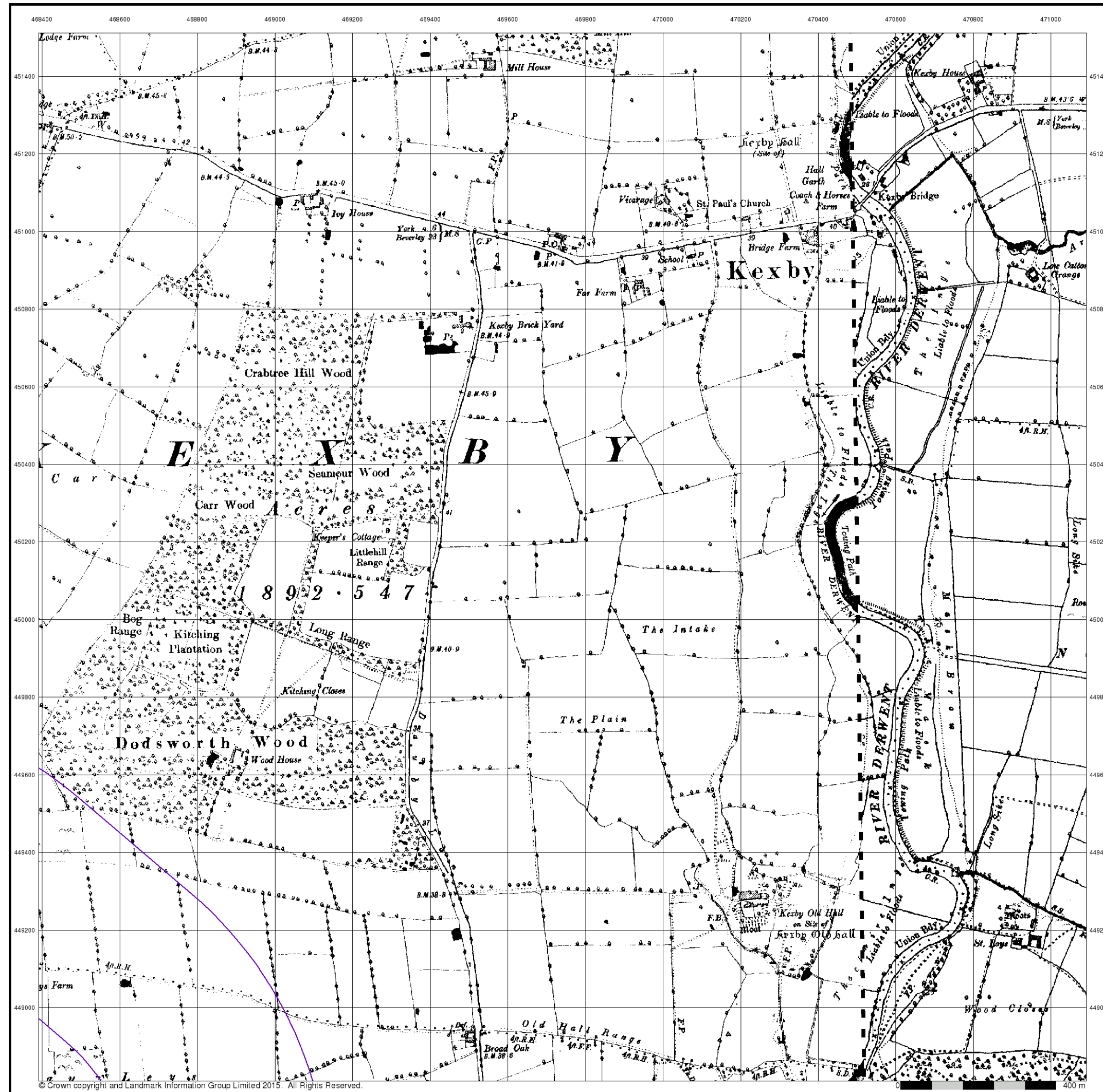
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 Customer Ref: 70011808-701
 National Grid Reference: 468660, 449100
 Slice: F
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 Search Buffer (m): 1000

Site Details

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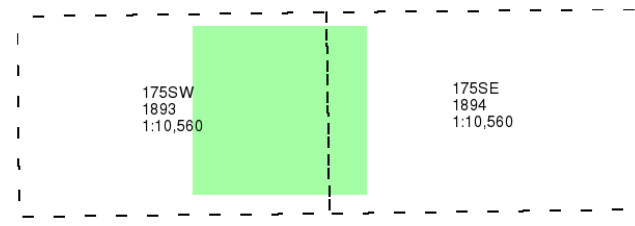
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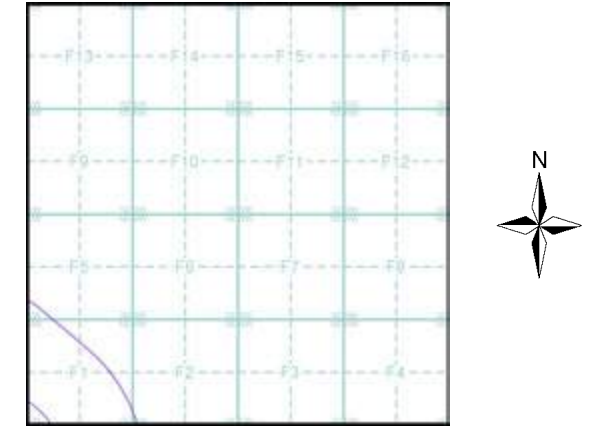
Yorkshire
Published 1893 - 1894
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice F



Order Details

Order Number: 95641417_1_1
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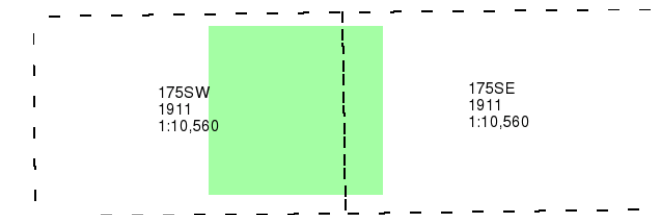
Yorkshire

Published 1911

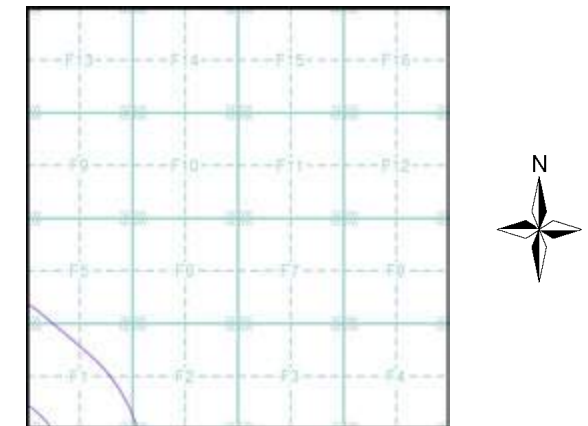
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice F



Order Details

Order Number: 95641417_1_1
Customer Ref: 70011808-701
National Grid Reference: 468660, 449100
Slice: F
Site Area (Ha): 246.75
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Site Details

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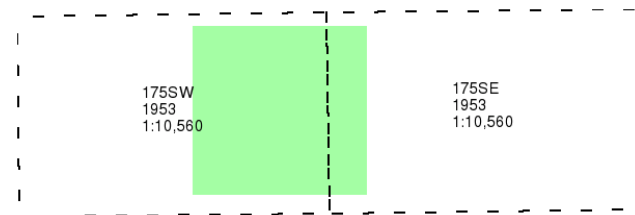
Yorkshire

Published 1953

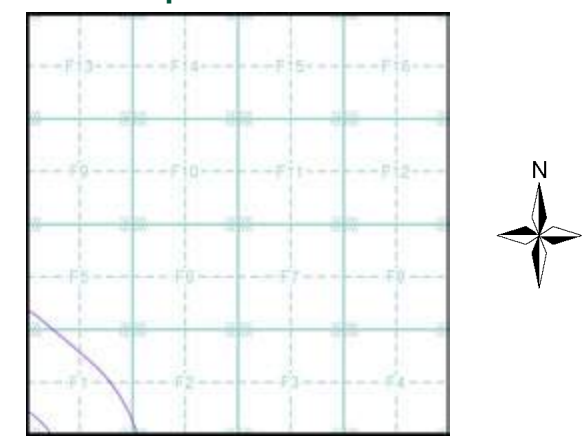
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)



Historical Map - Slice F



Order Details

Order Number: 95641417_1_1
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 National Grid Reference: 468660, 449100
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 Site Area (Ha): 246.75
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Site Details

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Ordnance Survey Plan

Published 1958

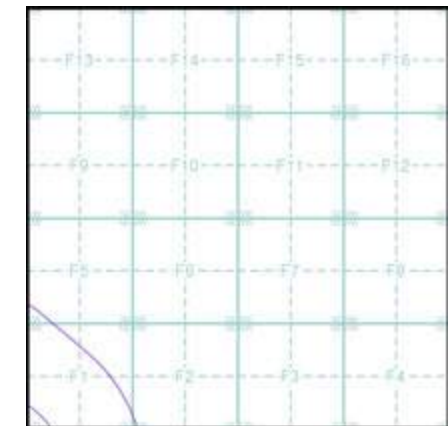
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

SE65SE	SE75SW
1958	1958
1:10,560	1:10,560
SE64NE	SE74NW
1958	1958
1:10,560	1:10,560

Historical Map - Slice F



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468660, 449100
 Slice: F
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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Ordnance Survey Plan

Published 1971 - 1972

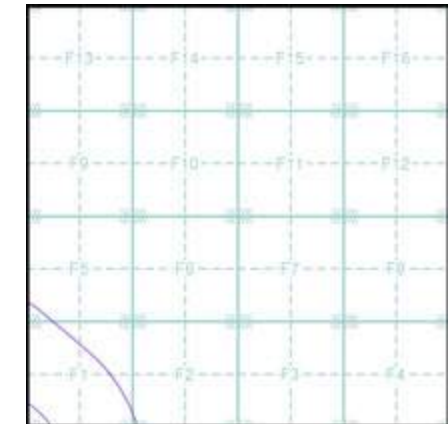
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

SE65SE	SE75SW
1971	1971
1:10,000	1:10,000
SE64NE	SE74NW
1972	1972
1:10,000	1:10,000

Historical Map - Slice F



Order Details

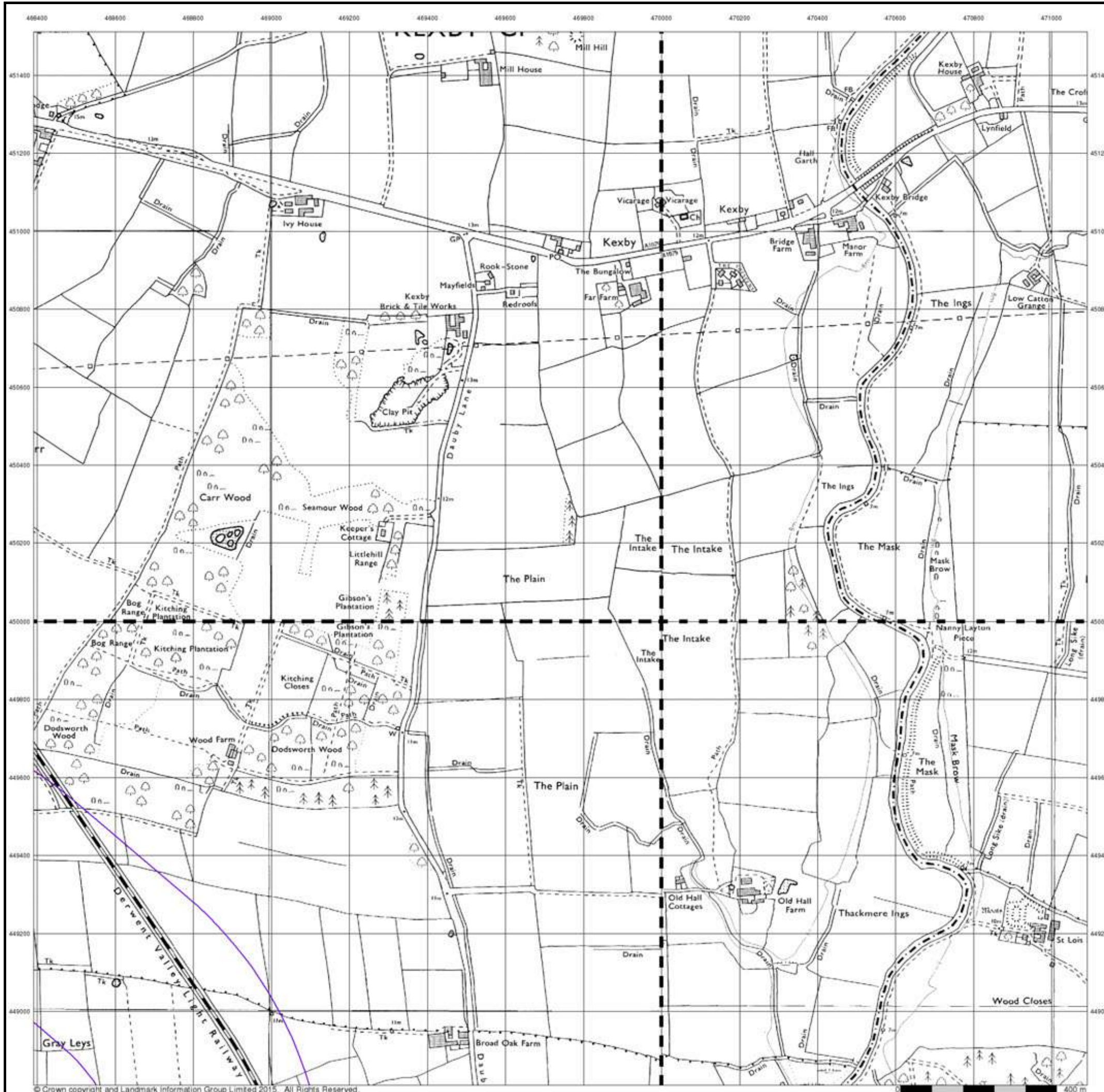
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 Customer Ref: 70011808-701
 National Grid Reference: 468660, 449100
 Slice: F
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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 Web: www.envirocheck.co.uk





Ordnance Survey Plan

Published 1984 - 1986

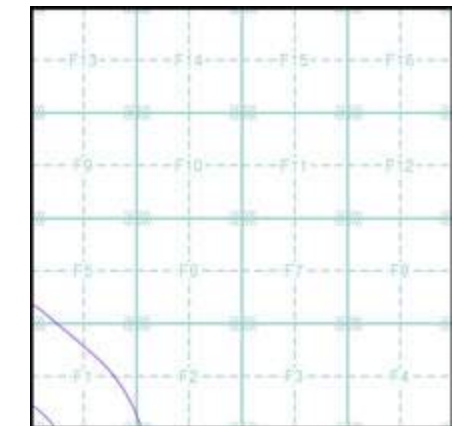
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

SE65SE 1984 1:10,000	SE75SW 1986 1:10,000
----------------------------	----------------------------

Historical Map - Slice F



Order Details

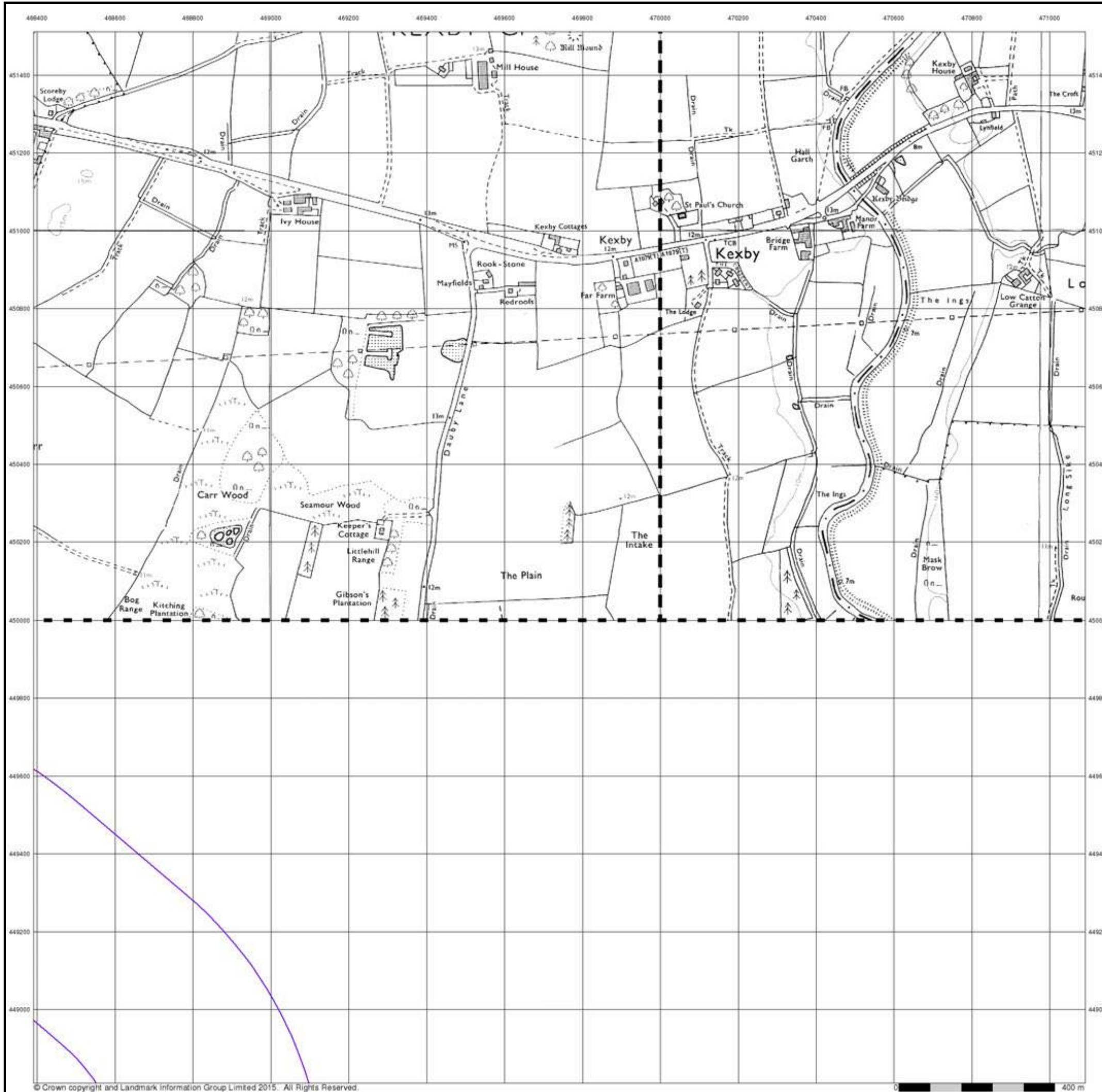
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468660, 449100
 Slice: F
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

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10k Raster Mapping

Published 1999

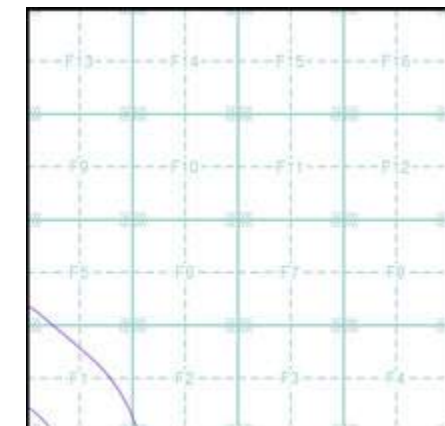
Source map scale - 1:10,000

The historical maps shown were produced from the Ordnance Survey's 1:10,000 colour raster mapping. These maps are derived from Landplan which replaced the old 1:10,000 maps originally published in 1970. The data is highly detailed showing buildings, fences and field boundaries as well as all roads, tracks and paths. Road names are also included together with the relevant road number and classification. Boundary information depiction includes county, unitary authority, district, civil parish and constituency.

Map Name(s) and Date(s)

SE65SE	SE75SW
1999	1999
1:10,000	1:10,000
SE64NE	SE74NW
1999	1999
1:10,000	1:10,000

Historical Map - Slice F



Order Details

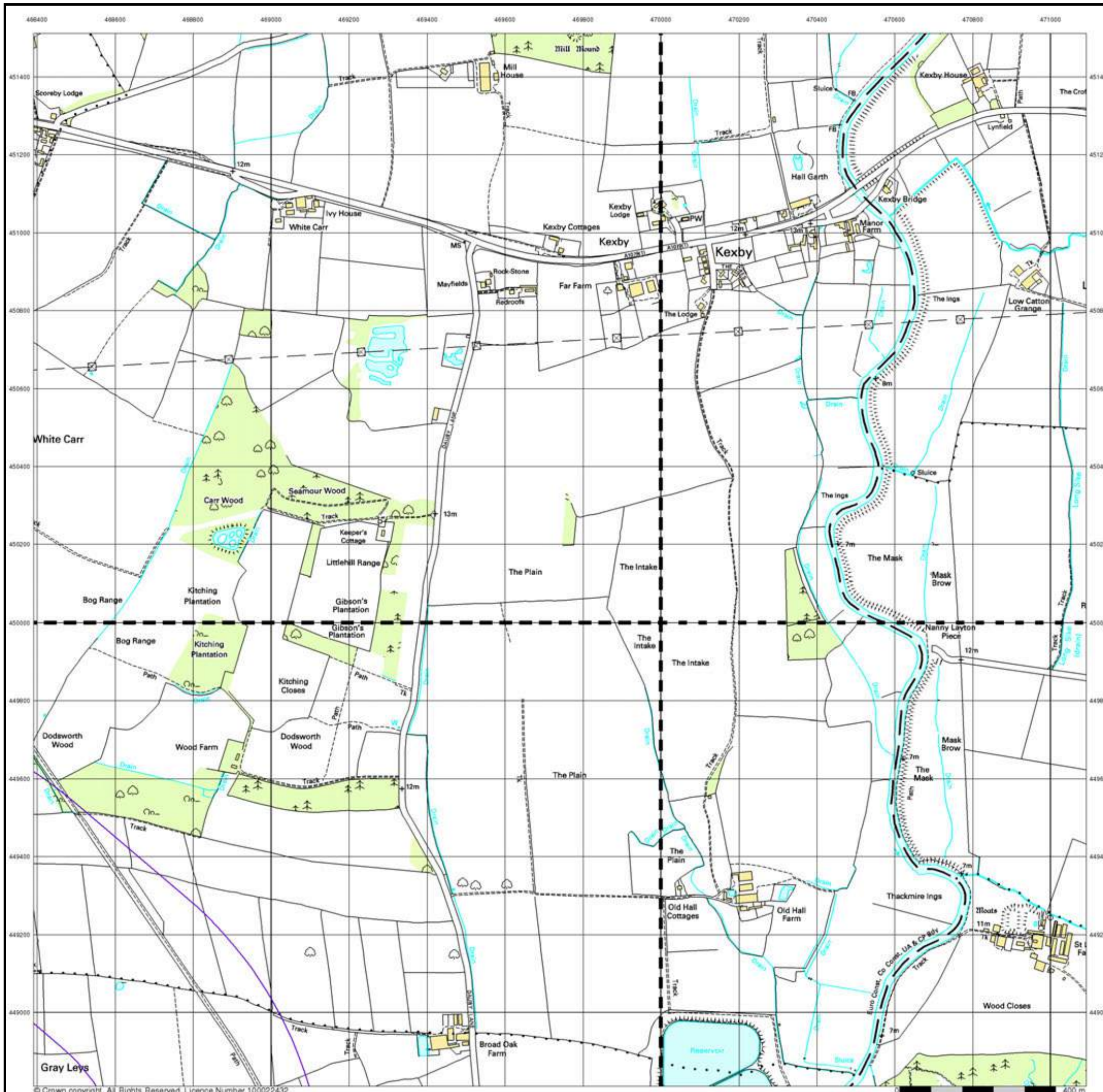
Order Number: 95641417_1_1
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 National Grid Reference: 468660, 449100
 Slice: F
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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10k Raster Mapping

Published 2006

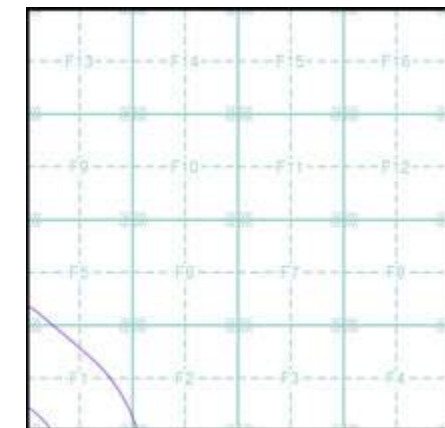
Source map scale - 1:10,000

The historical maps shown were produced from the Ordnance Survey's 1:10,000 colour raster mapping. These maps are derived from Landplan which replaced the old 1:10,000 maps originally published in 1970. The data is highly detailed showing buildings, fences and field boundaries as well as all roads, tracks and paths. Road names are also included together with the relevant road number and classification. Boundary information depiction includes county, unitary authority, district, civil parish and constituency.

Map Name(s) and Date(s)

SE65SE	SE75SW
2006	2006
1:10,000	1:10,000
SE64NE	SE74NW
2006	2006
1:10,000	1:10,000

Historical Map - Slice F



Order Details

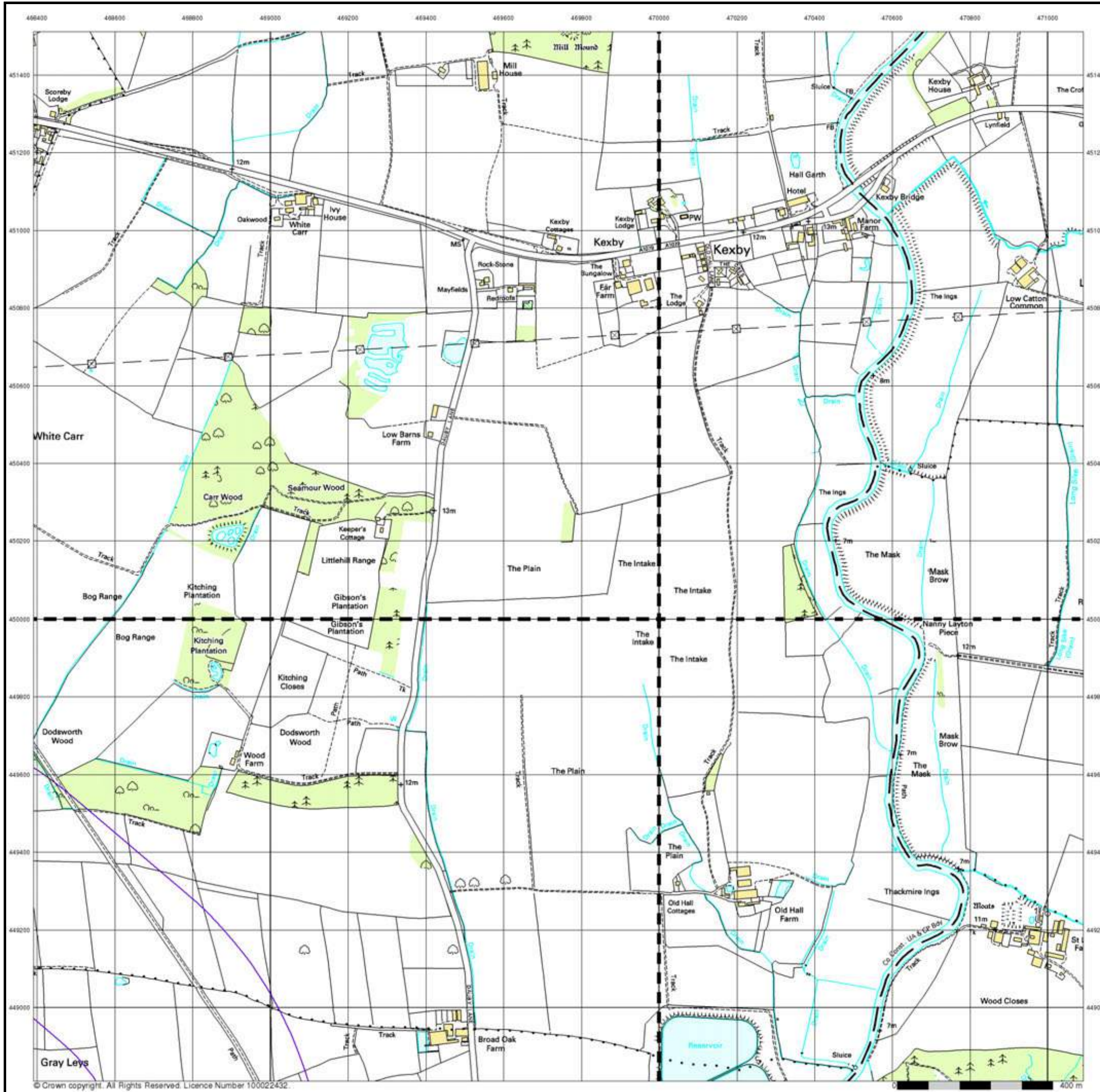
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Site Details

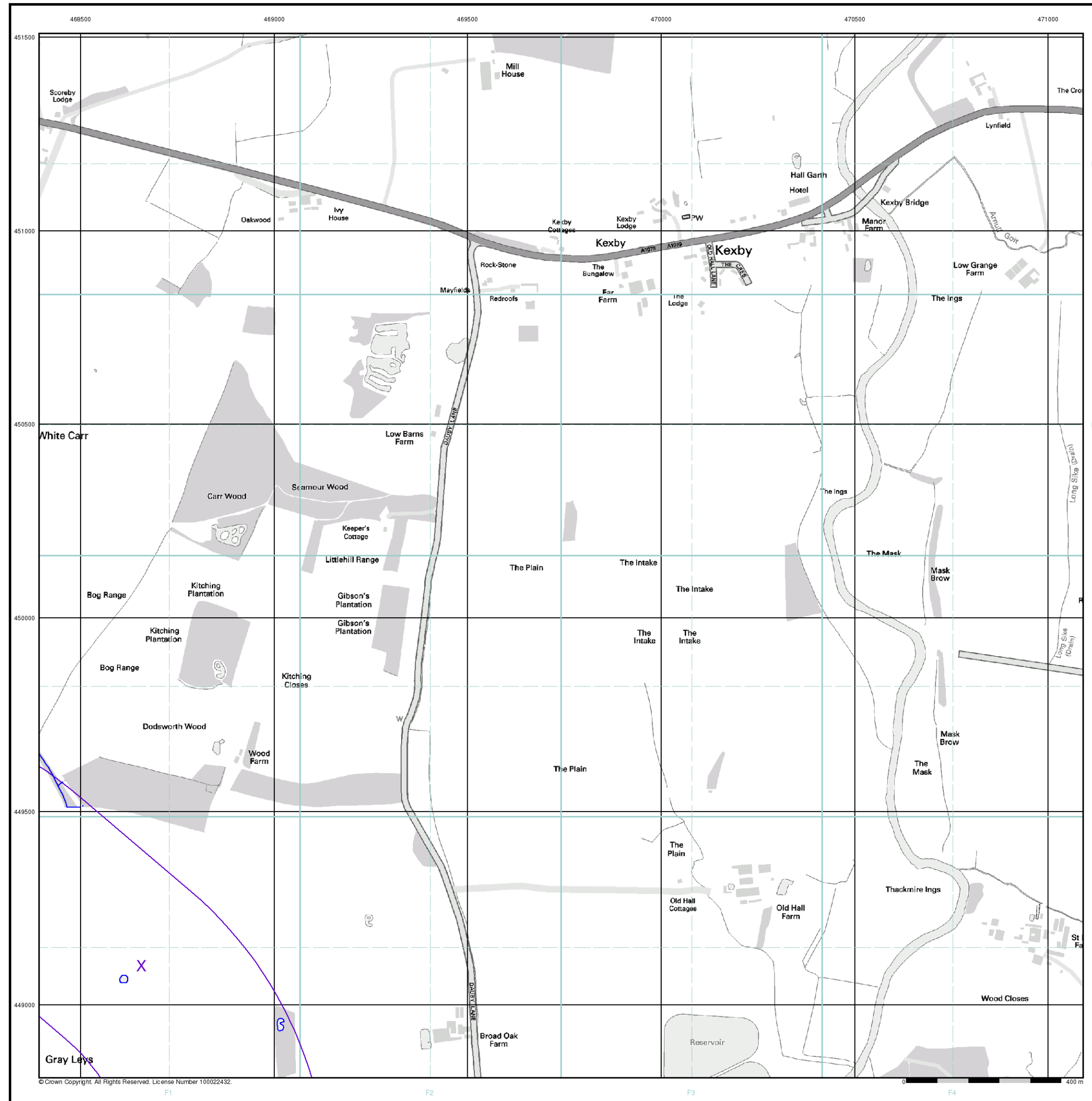
Site off Elvington Lane, York, YO41 4AU



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 Web: www.envirocheck.co.uk

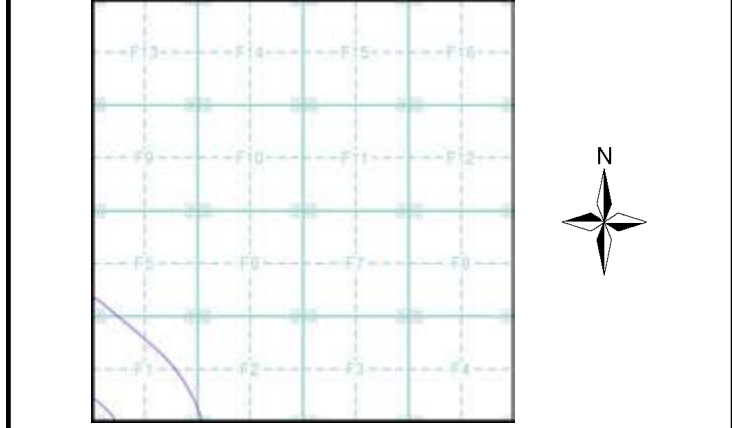


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- General**
- Specified Site
 - Specified Buffer(s)
 - Bearing Reference Point
 - Map ID
- Agency and Hydrological**
- Contaminated Land Register Entry or Notice (Location)
 - Contaminated Land Register Entry or Notice
 - Discharge Consent
 - Enforcement or Prohibition Notice
 - Integrated Pollution Control
 - Integrated Pollution Prevention Control
 - Local Authority Integrated Pollution Prevention and Control
 - Local Authority Pollution Prevention and Control
 - Local Authority Pollution Prevention and Control Enforcement
 - Pollution Incident to Controlled Waters
 - Prosecution Relating to Authorised Processes
 - Prosecution Relating to Controlled Waters
 - Registered Radioactive Substance
 - River Network or Water Feature
 - River Quality Sampling Point
 - Substantiated Pollution Incident Register
 - Water Abstraction
 - Water Industry Act Referral
- Waste**
- BGS Recorded Landfill Site (Location)
 - BGS Recorded Landfill Site
 - EA Historic Landfill (Buffered Point)
 - EA Historic Landfill (Polygon)
 - Integrated Pollution Control Registered Waste Site
 - Licensed Waste Management Facility (Landfill Boundary)
 - Licensed Waste Management Facility (Location)
 - Local Authority Recorded Landfill Site (Location)
 - Local Authority Recorded Landfill Site
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Non-water)
 - Potentially Infilled Land (Water)
 - Potentially Infilled Land (Water)
 - Potentially Infilled Land (Water)
 - Registered Landfill Site (Location)
 - Registered Landfill Site (Point Buffered to 100m)
 - Registered Landfill Site (Point Buffered to 250m)
 - Registered Waste Transfer Site (Location)
 - Registered Waste Transfer Site
 - Registered Waste Treatment or Disposal Site (Location)
 - Registered Waste Treatment or Disposal Site
- Hazardous Substances**
- COMAH Site
 - Explosive Site
 - NIHHS Site
 - Planning Hazardous Substance Consent
 - Planning Hazardous Substance Enforcement
- Geological**
- BGS Recorded Mineral Site

Site Sensitivity Map - Slice F



Order Details

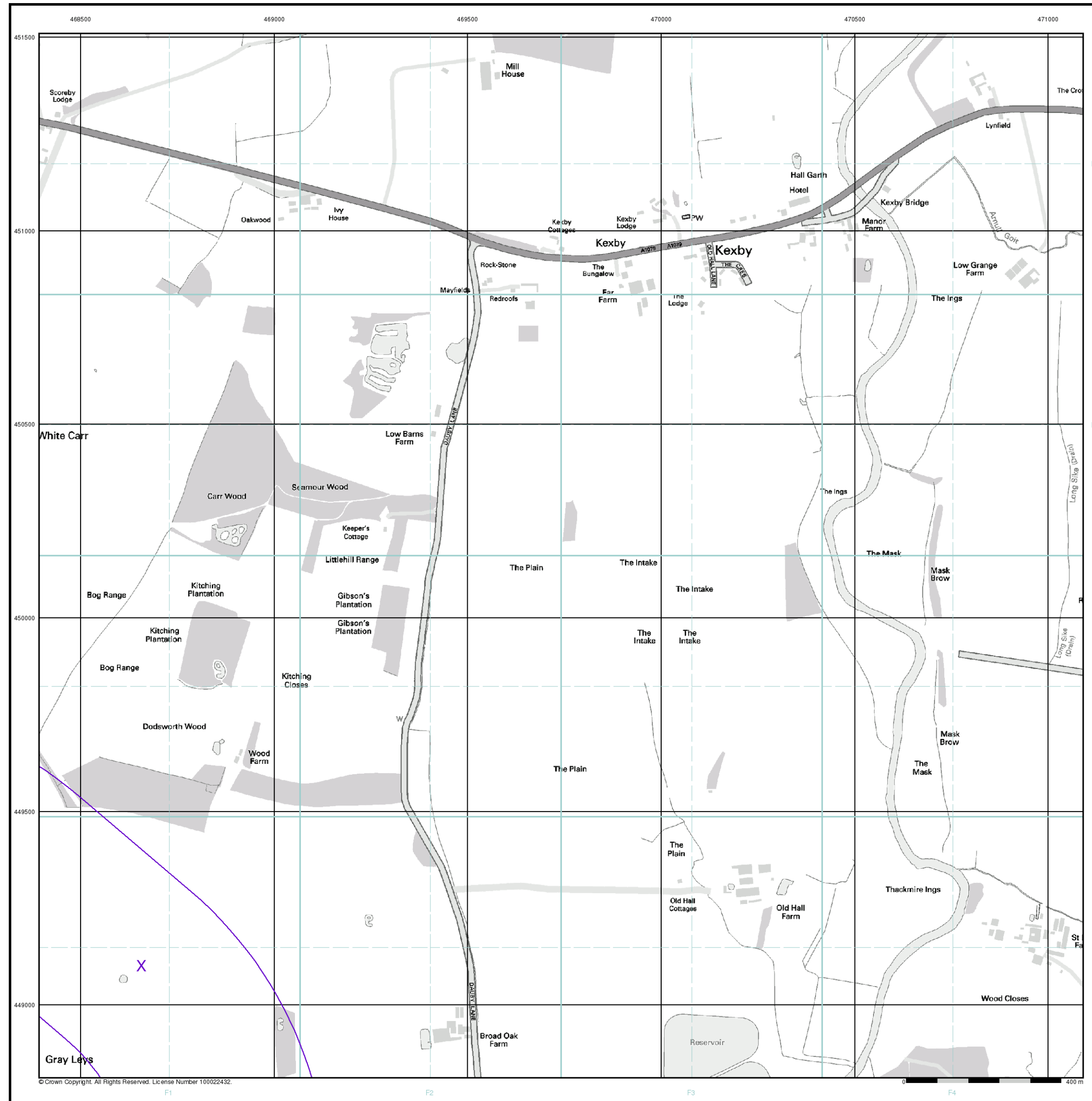
Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468660, 449100
 Slice: F
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU

Landmark Information Group

Tel: 0844 844 9952
 Fax: 0844 844 9951
 Web: www.envirocheck.co.uk

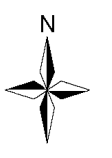
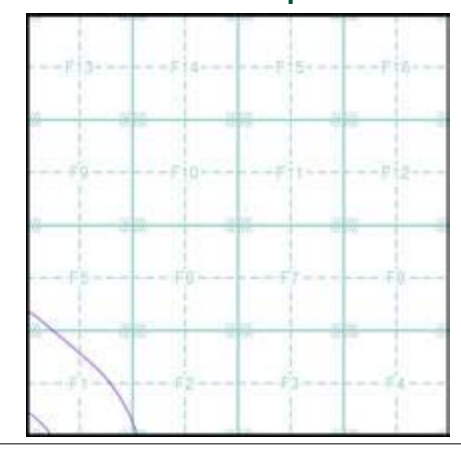


Industrial Land Use Map

- General**
- Specified Site
 - Specified Buffer(s)
 - Bearing Reference Point
 - Slice
 - Map ID

- Industrial Land Use**
- Contemporary Trade Directory Entry
 - Fuel Station Entry
 - Gas Pipeline
 - Points of Interest - Commercial Services
 - Points of Interest - Education and Health
 - Points of Interest - Manufacturing and Production
 - Points of Interest - Public Infrastructure
 - Points of Interest - Recreational and Environmental
 - Underground Electrical Cables

Industrial Land Use Map - Slice F



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468660, 449100
 Slice: F
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU








Tel: 0844 844 9952
 Fax: 0844 844 9951
 Web: www.envirocheck.co.uk

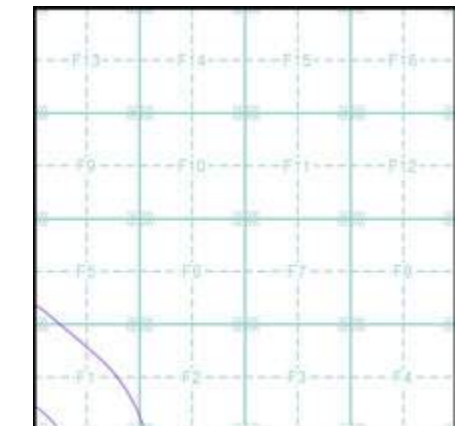
General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point

Agency and Hydrological (Flood)

-  Extreme Flooding from Rivers or Sea without Defences (Zone 2)
-  Flooding from Rivers or Sea without Defences (Zone 3)
-  Area Benefiting from Flood Defence
-  Flood Water Storage Areas
-  Flood Defence

Flood Map - Slice F

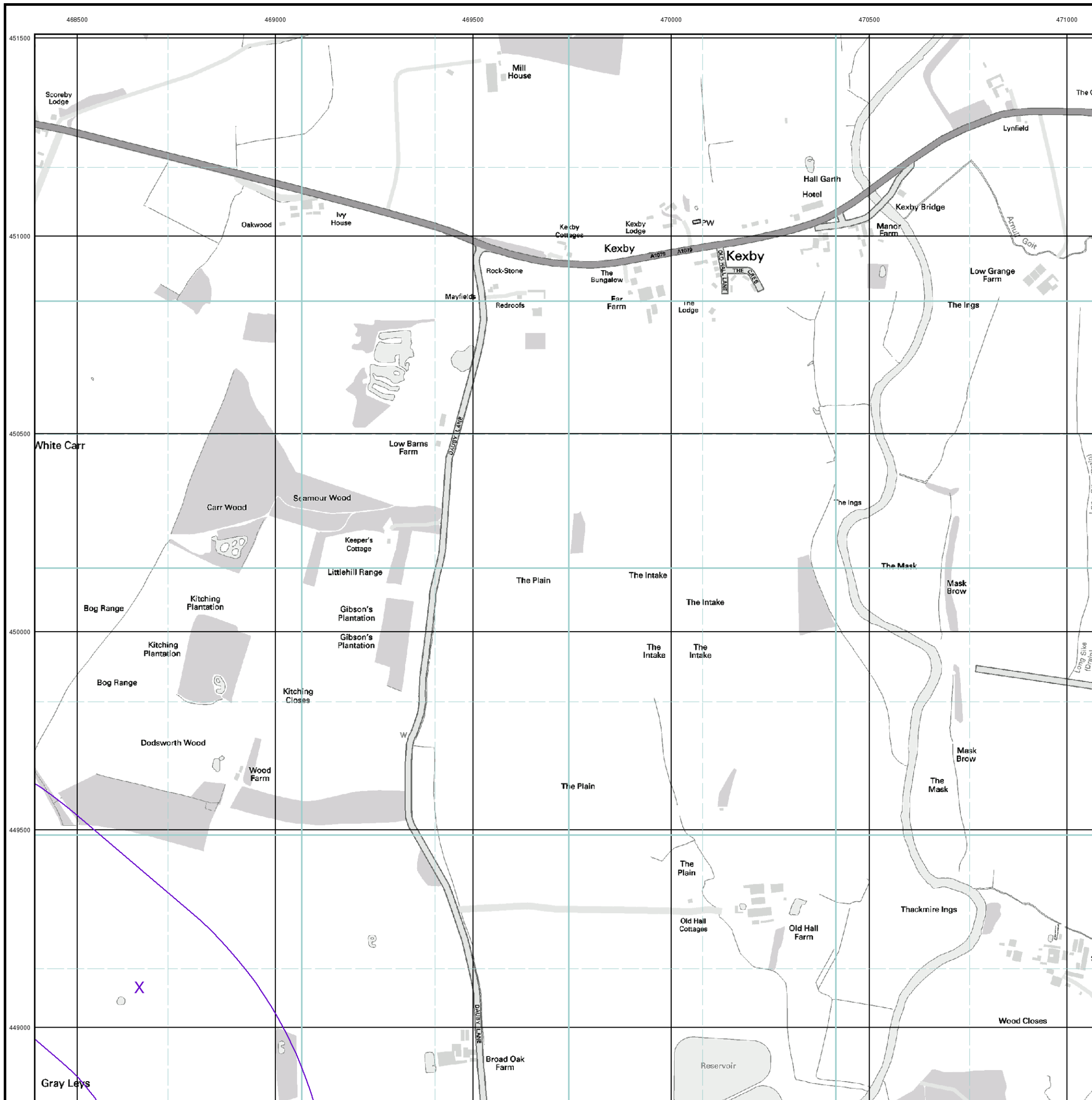


Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468660, 449100
 Slice: F
 Site Area (Ha): 246.75
 Search Buffer (m): 1000






Site Details

Site off Elvington Lane, York, YO41 4AU








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General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point
-  Map ID
-  Several of Type at Location

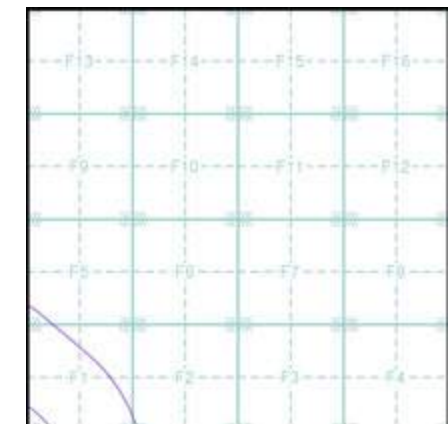
Agency and Hydrological (Boreholes)

-  BGS Borehole Depth 0 - 10m
-  BGS Borehole Depth 10 - 30m
-  BGS Borehole Depth 30m +
-  Confidential
-  Other

For Borehole information please refer to the Borehole .csv file which accompanied this slice.

A copy of the BGS Borehole Ordering Form is available to download from the Support section of www.envirocheck.co.uk.

Borehole Map - Slice F

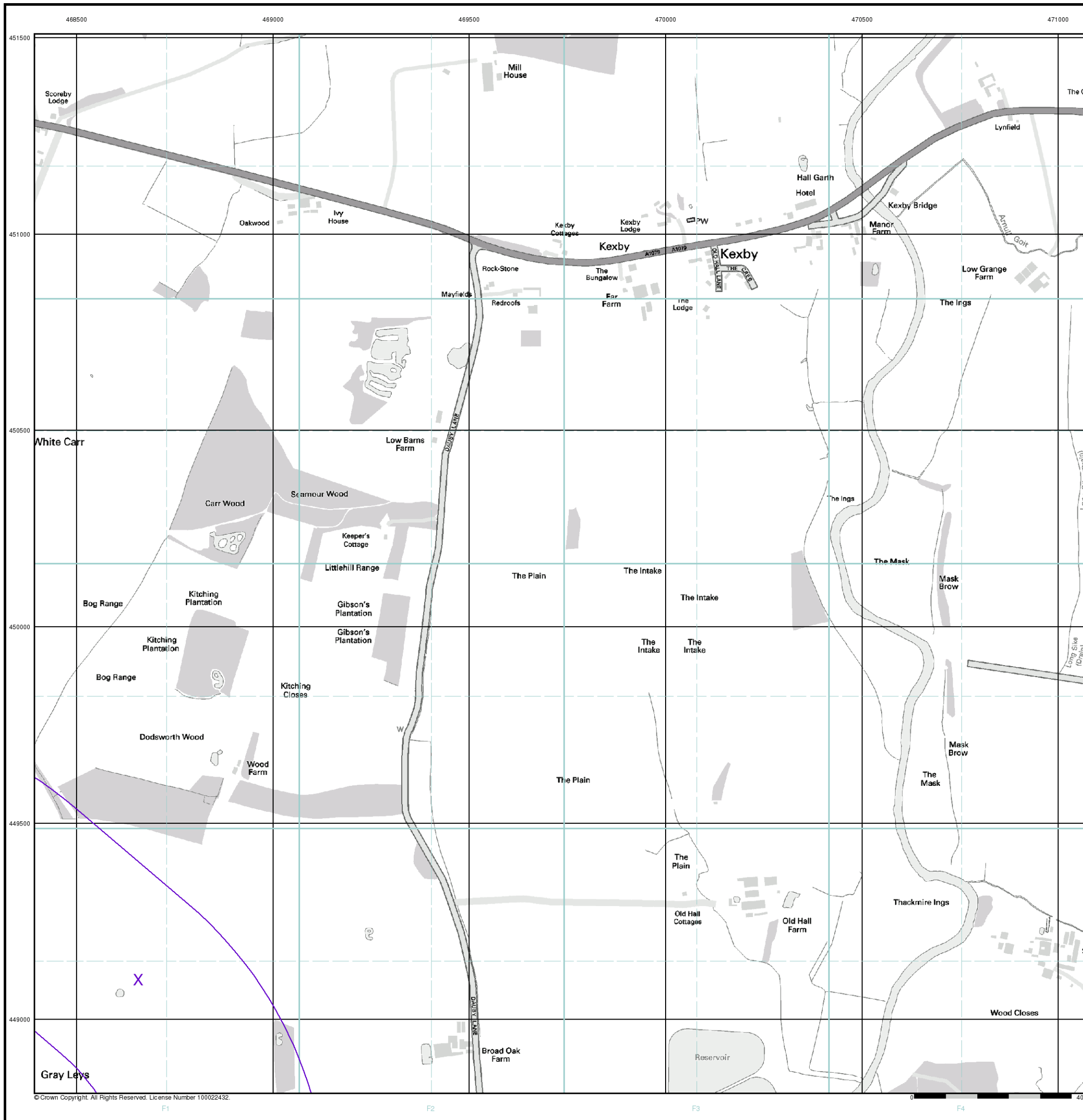


Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468660, 449100
 Slice: F
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



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General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point
- Map ID

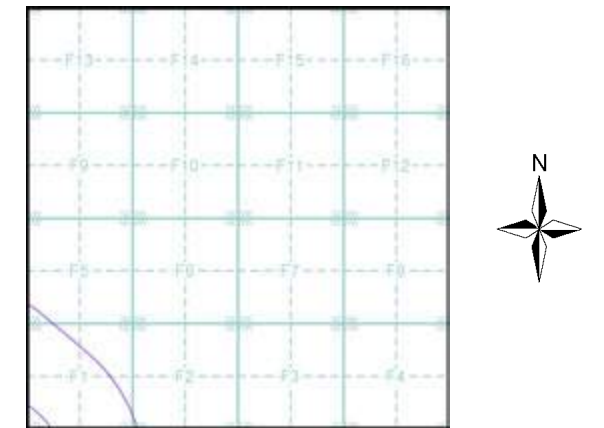
Detailed River Network Data

- Primary River
- Secondary River
- Tertiary River
- Canal
- Canal Tunnel
- Undefined River
- Lake/Reservoir
- Offline Drainage Feature
- Extended Culvert (greater than 50m)
- Underground River (inferred)
- Underground River (local knowledge)
- Downstream of High Water Mark
- Downstream of Seaward Extension
- Not assigned River feature

Contours (height in metres)

- Standard Contour 105
- Master Contour 100
- Spot Height 167.3
- MLW - Mean Low Water
- MHW - Mean High Water

E/ANRW Detailed River Network Map - Slice F



Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468660, 449100
 Slice: F
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details




Site off Elvington Lane, York, YO41 4AU



Tel: 0844 844 9952
 Fax: 0844 844 9951
 Web: www.envirocheck.co.uk



General

-  Specified Site
-  Specified Buffer(s)
-  Bearing Reference Point

Risk of Flooding from Surface Water

-  High - 30 Year Return
-  Medium - 100 Year Return
-  Low - 1000 Year Return

Suitability

See the suitability map below

-  National to county
-  County to town
-  Town to street
-  Street to parcels of land
-  Property

E/ANRW Suitability Map - Slice F

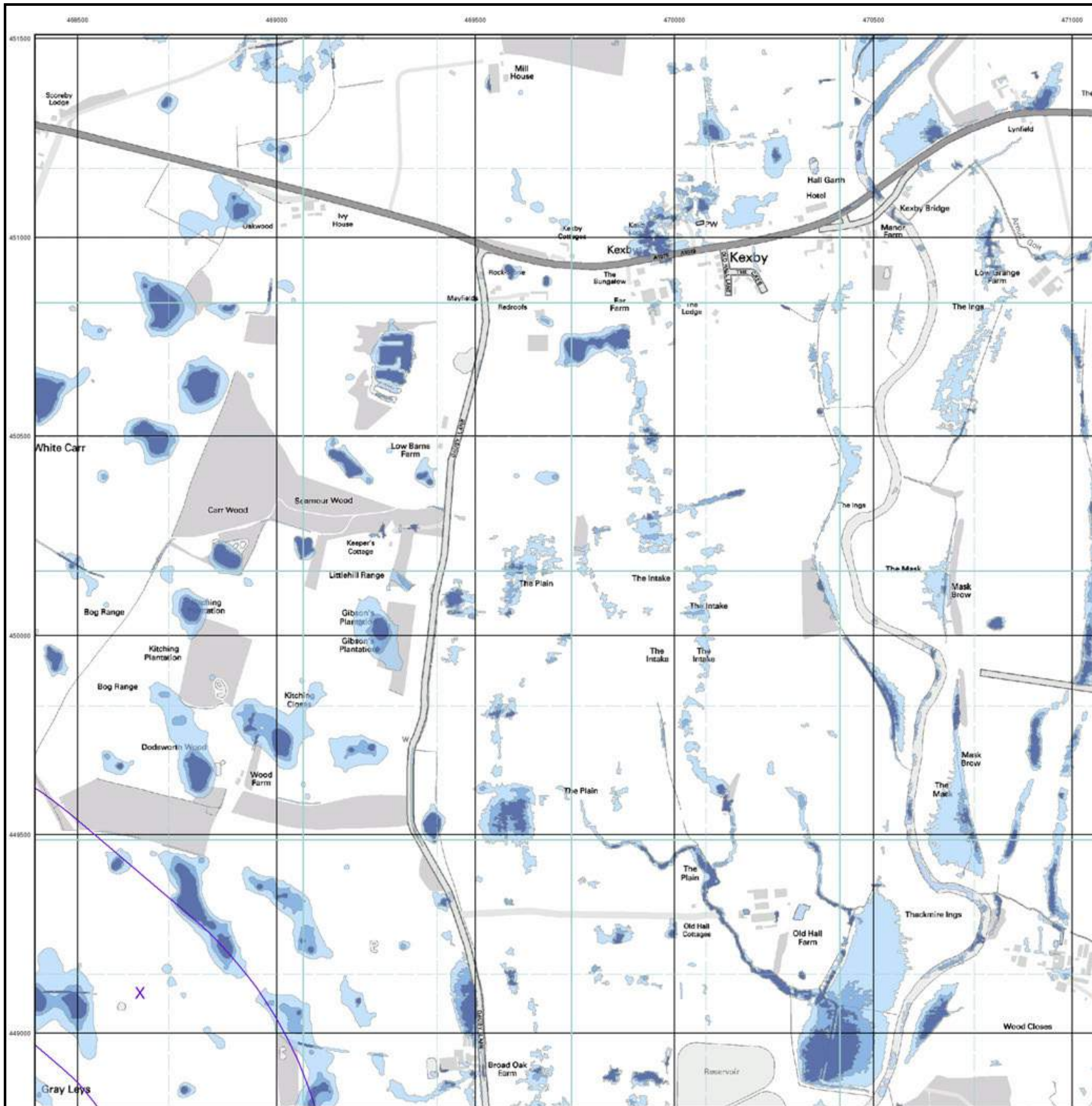


Order Details

Order Number: 95641417_1_1
 Customer Ref: 70011808-701
 National Grid Reference: 468660, 449100
 Slice: F
 Site Area (Ha): 246.75
 Search Buffer (m): 1000

Site Details

Site off Elvington Lane, York, YO41 4AU



Appendix E

UXO PRELIMINARY RESPONSE



Pre-Desk Study Assessment

Site:	Land West of Elvington Lane, Elvington, York, YO41 4AU
Client:	WSP PB
Contact:	Jess Kinchington
Date:	31 st August 2016
Pre-WWI Military Activity on or Affecting the Site	None identified.
WWI Military Activity on or Affecting the Site	None identified.
WWI Strategic Targets (within 5km of Site)	The following strategic targets were located in the vicinity of the Site: <ul style="list-style-type: none"> ■ Transport infrastructure.
WWI Bombing	None identified on the Site.
Interwar Military Activity on or Affecting the Site	None identified.
WWII Military Activity on or Affecting the Site	<p>Royal Air Force (RAF) Elvington was opened on land encompassing the majority of the Site in 1942. It was built as a standard Bomber Command airfield, initially a satellite for RAF Pocklington. The airfield was initially occupied by No. 77 Squadron.</p> <p>In 1944, RAF Elvington became a base for French Bomber squadrons.</p> <p>RAF Elvington was equipped with bomb and munition stores, in addition to practice firing ranges and test butts, some of which were on the Site.</p> <p>Several aircraft crashes were recorded at RAF Elvington during WWII.</p>
WWII Strategic Targets (within 5km of Site)	The following strategic targets were located in the vicinity of the Site: <ul style="list-style-type: none"> ■ RAF Elvington and other operational airfields. ■ Military barracks and camps. ■ Transport infrastructure and public utilities. ■ Anti-Aircraft (AA) and anti-invasion defences.
WWII Bombing Decoys (within 5km of Site)	1No. located approximately 1.6km from the Site.
WWII Bombing	<p>During WWII the Site was located in the Rural District (RD) of Derwent, which officially recorded 94No. High Explosive (HE) bombs with a very low regional bombing density of 1.7 bombs per 405 hectares (ha).</p> <p>Note that these records do not typically include statistics of bombs falling on military establishments, such as airfields, which were usually recorded separately.</p> <p>Readily available records indicate that RAF Elvington was bombed during at least</p>

	1 No. air raid.
Post-WWII Military Activity on or Affecting the Site	<p>RAF Elvington went into Care & Maintenance for a short period after WWII before becoming a sub-site for No. 14 Maintenance Unit (MU).</p> <p>RAF Elvington was reused as a Relief Landing Ground (RLG) between May 1952 and January 1954. The airfield was also used for the storage of surplus bombs during this period.</p> <p>American forces occupied the airfield in 1953 and a large new main runway was constructed. The airfield served as an RLG for jet aircraft before closing in 1966.</p>
Recommendation	<p>The majority of the Site comprises part of a former operational military airfield, which provides several potential sources of Unexploded Ordnance (UXO) hazard.</p> <p>Given this, a detailed desk study is recommended to assess, and potentially zone, the UXO level on the Site.</p>

This summary is based on a cursory review of readily available records. Caution is advised if you plan to action work based on this summary.

It should be noted that where a potentially significant source of UXO hazard has been identified on the Site, the requirement for a detailed desk study and risk assessment has been confirmed and no further research will be undertaken at this stage. It is possible that further in-depth research as part of a detailed UXO desk study and risk assessment may identify other potential sources of UXO hazard on the Site.

Appendix F

FENNELL, GREEN AND BATES 1992 REPORT

FENNELL, GREEN & BATES,

Mining Engineers.

Surveyors.

Estate Agents & Valuers

A. GREEN, F.R.I.C.S.

CHARTERED SURVEYOR,

C. ENG. M.I.M.E.

G. GREEN, B.Sc.

TELEPHONE No. 372197 STD 0924
FAX No. 0924 386535

25, *Smyth Street,*
Wakefield,
West Yorkshire, WF1 1ED

14th December 1992

REPORT ON LAND

AT

R.A.F. ELVINGTON

NEAR YORK

Report on land at
R.A.F. Elvington, Near York

Following the acceptance of our tender we were instructed by the Ministry of Defence to carry out the appraisal and valuation as set out in their invitation to tender dated 22nd June 1992.

The instructions, "Scope of Commission items 2.1 and 2.2", ask that we investigate the depth of concrete and granular fill over the areas not covered by the attached history.

The following sets out the results of this investigation.

1. The investigation covers two distinct areas within the site, (a) the hardstanding area and (b) the concrete sections at each end of the main runway along with the short sections of the taxiway which lead on to each end of the main runway,

(a) The hardstanding area

This section covers an area of approximately 18 hectares (44 acres).

We have learned during the course of the investigation that beneath the concrete overlay there are at least 12 huge aviation fuel tanks and associated piping. Clearly seen on the surface of the concrete are 36 steel caps which it is assumed are the original fuel filling points. Not being sure how far these tanks were below the concrete, and not wishing to bore into any and possibly rupture them, only the thickness of the concrete was proved here along with just a few inches of the granular fill below the concrete.

However, off the edge of the concrete a few proving pits were dug revealing about 700mm on average of granular hardcore fill. It is assumed therefore that this would be the thickness of granular fill under the whole area. With regard to the fuel tanks, it is further assumed they are set into their own separate areas with granular fill surrounding them.

The average thickness of the concrete overlay in this hardstanding area is 528mm, the concrete being clean, completely free of steel reinforcing and of reasonably good quality. A total of 8 proving holes were drilled in this particular area.

(b) Main runway and taxiway areas

These are the areas of concrete at each end of the main runway not covered by a top layer of asphalt, therefore not included in the history of the runway which was provided by the Ministry of Defence.

As with the hardstanding area, the concrete has proved to be much the same in terms of thickness and quality and again steel reinforcing was not encountered. A total of 10 proving holes were drilled, 5 at each end of the runway, the average thickness of the concrete being 563mm.

Below the concrete a hardcore/rubble fill was found but was inconsistent in terms of the materials used. Some of the holes showed the fill used to be a mixture of crushed limestone and soft sand, others a mixture of brick rubble and quarry stone of a chalky nature, also with soft sand. Some holes went straight into the fine sand which is found all over the site. However, the thickness of the granular fill within the concrete areas, averages out at 720mm.

Borehole logs for (a) Hardstanding area

- Hole No. 1 - concrete 510mm over 75mm of loose limestone and soft sand.
- Hole No. 2 - concrete 510mm over 50mm of soft red sand and rubble.
- Hole No. 3 - concrete 590mm over 75mm of rubble.
- Hole No. 4 - concrete 490mm over 75mm of chalky stone, rubble and soft sand.
- Hole No. 5 - concrete 490mm over 60mm of rubble and soft sand.
- Hole No. 6 - concrete 590mm over 75mm of limestone and soft sand.
- Hole No. 7 - concrete 540mm over 80mm of soft red sand.
- Hole No. 8 - concrete 510mm over 75mm of crushed soft limestone and soft sand.
- Average thickness of concrete ~ 528mm.

Borehole log for (b) runway/taxiway areas

- Hole No. 9 - concrete 520mm over 700mm of soft broken limestone and soft sand.
- Hole No.10 - concrete 540mm over 750mm of chalky stone, rubble and soft sand.
- Hole No.11 - concrete 660mm over 720mm of broken rubble and chalky stone.
- Hole No.12 - concrete 530mm over 700mm of crushed or broken limestone, gravel and soft sand.
- Hole No.13 - concrete 560mm over 720mm of a mixture of gravel, stone, sand.

Hole No.14 - concrete 460mm over 750mm of crushed chalky stone and sand.

Hole No.15 - concrete 560mm over 700mm of crushed stone, gravel and soft sand.

Hole No.16 - concrete 510mm over 730mm of rubble, chalky stone, soft sand.

Hole No.17 - concrete 710mm over 700mm of soft sand and chalky stone.

Hole No.18 - concrete 580mm over 750mm of broken limestone, chalky stone and soft sand.

Average thickness of concrete - 563mm.

Average thickness of granular hardcore fill - 723mm.

Estimated volume of concrete

(a) Hardstand area	-	104,544 cubic metres
(b) Runway areas		
08 end	-	6,960 cubic metres
26 end	-	4,590 cubic metres
(c) Taxiway areas		
08 end	-	3,710 cubic metres
26 end	-	7,500 cubic metres
		<hr/>
Total		127,304 cubic metres
		<hr/>

Estimated tonnes at 2.2 tonne/cubic metre = 280,000

With regard to the volume of concrete contained in the main runway, this is computed to be approximately 107,000 tonnes. This is considerably less than the volumes in the hardstanding and taxiway ends by virtue of the fact that the surface area is less and the concrete thickness according to the "history", averages 300mm against a proved average of 563mm in the hardstanding and other areas.

It is further computed, again from the "history", that the asphalt base and wearing course over the main runway, which together average 120mm in thickness, would yield approximately 38,000 tonnes of surface dressing.

It is estimated therefore that the total volume of concrete would be -

1.	Hardstanding area)	
	Taxiway areas)	280,000 tonnes
	Ends of main runway)	
2.	Main runway	107,000 tonnes
		<hr/>
		387,000 tonnes
		<hr/>

Estimated volume of granular fill

In estimating the possible volume of granular fill, only the runway areas (08 and 26) and taxiway areas (08 and 26) have been taken into account. It is estimated these areas would yield approximately 49,000 tonnes of material.

The second part of the investigation concerned the drilling of the land areas either side of the main runway in order to prove the thickness and quality of any underlying materials.

A total of 12 holes were drilled, A to L, the first being put down by the shell and auger method but because of problems encountered with the inflow of water and the slowness of this equipment, the remaining holes were drilled with a truck mounted rotary drill.

In brief terms all the holes drilled produced much the same result with topsoil, soft clay, soft occasionally running sand and boulder clay. Samples of sand were taken at each hole with some being sent for grading analysis, the results of which are attached.

From these results it will be seen that the sand is extremely fine showing only 1% of gravel, although in practical terms this 1% is in fact coarse graded sand. It will also be noted that between 8% and 12% of the samples fall into the silty clay category and this would certainly be lost should any processing be undertaken.

As for the 87% to 91% of sand, the grading curve shows it to be ultrafine and not evenly graded. This is immediately apparent in the very steep curve in the grading results, particularly in the 0.20 to 0.06 micron range.

It is considered that overall losses in any processing would be extremely high, possibly upwards of 50%, with the remainder unlikely to fall within any current materials specification due to the material not being evenly graded. It is not thought there is any commercial market for such processed material.

It is considered that if the mineral within the site is to be extracted and marketed, it could only be used as a bulk fill material.

Borehole log - land drilling

Borehole 'A' - 0.40m topsoil
 0.60m red/brown silty sandy clay
 0.25m dark grey very silty clay
 1.95m grey soft sand
 3.80m mid-brown boulder clay

Borehole 'B' - 0.30m topsoil
 1.55m red sandy silty clay
 2.70m red soft sand
 5.45m brown boulder clay

- Borehole 'C' - 0.30m topsoil
0.65m red/brown silty clay
0.45m yellow/brown sandy clay
1.80m red/brown soft sand
1.20m red/brown soft sandy clay
4.10m brown boulder clay
- Borehole 'D' - 0.55m topsoil
0.70m yellow/brown sandy clay
0.25m mid brown sandy clay
7.1m mid brown boulder clay
- Borehole 'E' - 0.40m topsoil
1.80m mid brown sandy clay
2.30m red/brown soft sand
4.00m brown boulder clay
- Borehole 'F' - 0.65m topsoil and silt
2.70 red/brown sandy clay
2.0m red/brown soft sand
3.25m brown boulder clay
- Borehole 'G' - 0.65m topsoil
1.0m yellow/brown sandy clay
1.15m brown sandy clay
1.80m red/brown soft sand
3.90m brown boulder clay
- Borehole 'H' - 0.48m topsoil
0.97m brown sandy clay
0.85m grey sandy clay
2.20m red/brown soft sand
3.00m brown boulder clay

Borehole 'I' - 0.40m topsoil
0.45m red/brown silty clay
1.05m orange/brown sandy clay
2.70m red/brown soft sand
2.90m brown boulder clay

Borehole 'J' - 0.40m topsoil
1.25m black silty clay
0.95m brown sandy clay
2.90m red/brown soft sand
3.00m brown boulder clay

Borehole 'K' - 0.30m topsoil
0.55m black silty clay
1.75m orange/brown sandy clay
3.50m red/brown soft sand
1.90m brown boulder clay

Borehole 'L' - 0.40m topsoil
1.85m black silty clay
4.05m red/brown soft sand
1.20m brown boulder clay

Average standing water level - 1.15m below surface.

Estimated volume in-situ of soft sand within the site but excluding the areas covered by concrete - 2.65 million cubic metres.

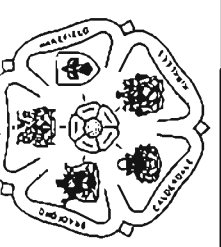
APPENDIX

1. Location Map
2. Sample analysis and test results



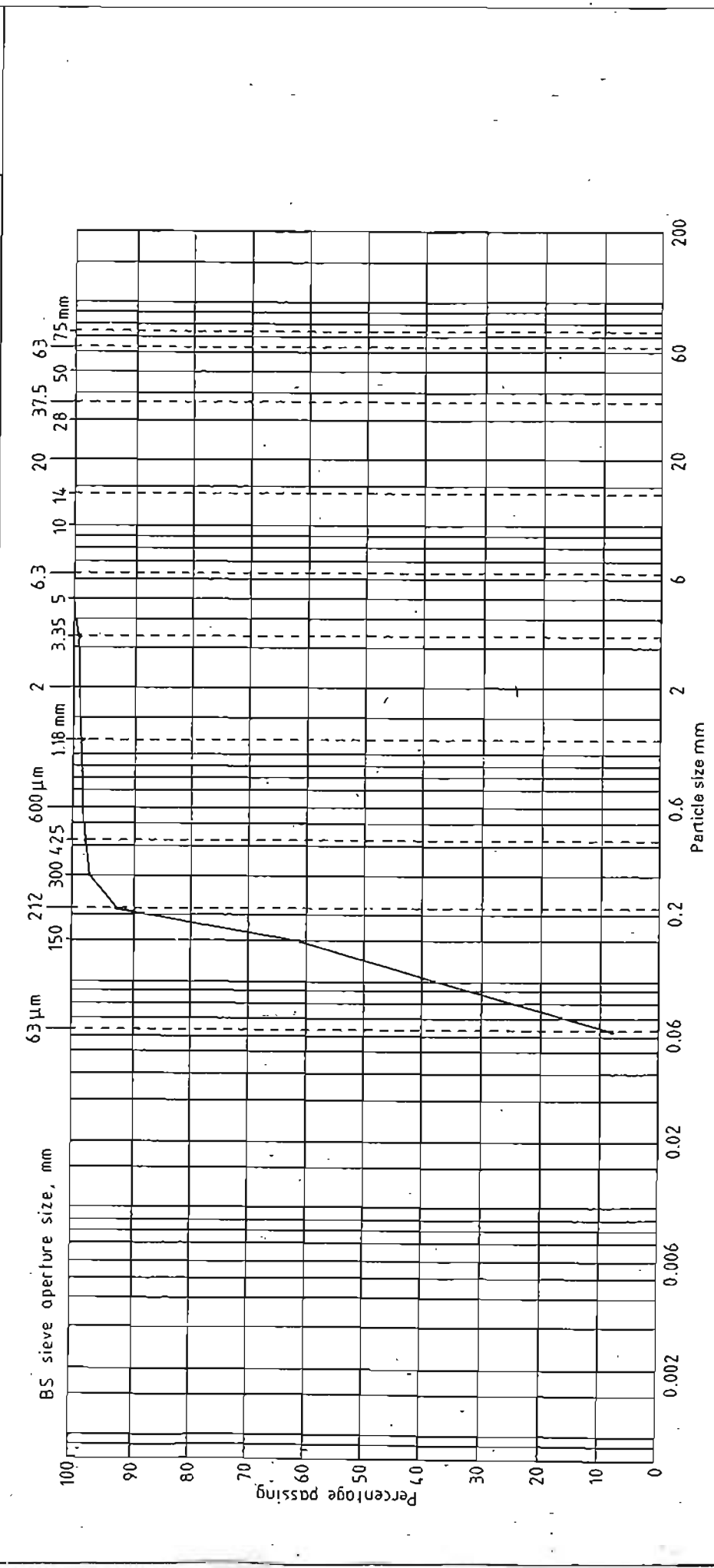
THE LOCAL AUTHORITY CONSULTANCY

West Yorkshire Highways, Engineering and
 Technical Services Joint Committee
 Materials Laboratory
 Horbury Road
 Ossett
 Wakefield
 WF5 0BZ
 Telephone: (0924) 260621
 Fax: (0924) 279682



Particle size distribution chart

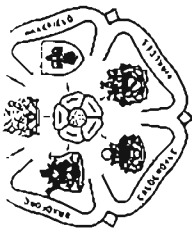
Location ELVINGTON	Soil description Brown fine/medium SAND with occasional fine gravel and dark brown silt (very wet with free water)	Job ref. S92P38	Sample no. S249
Test method BS 1377 : Part 2 : 1990 : 9.2/9.3/9.4/9.6/9.7*	with occasional fine gravel and dark brown silt (very wet with free water)	Depth L	Date 22.10.92



CLAY	Fine	Medium	Coarse	Fine	Medium	Coarse	Fine	Medium	Coarse	COBBLES	BOULDERS	
	SILT			GRAVEL							Checked	Approved
Operator											Checked	Approved

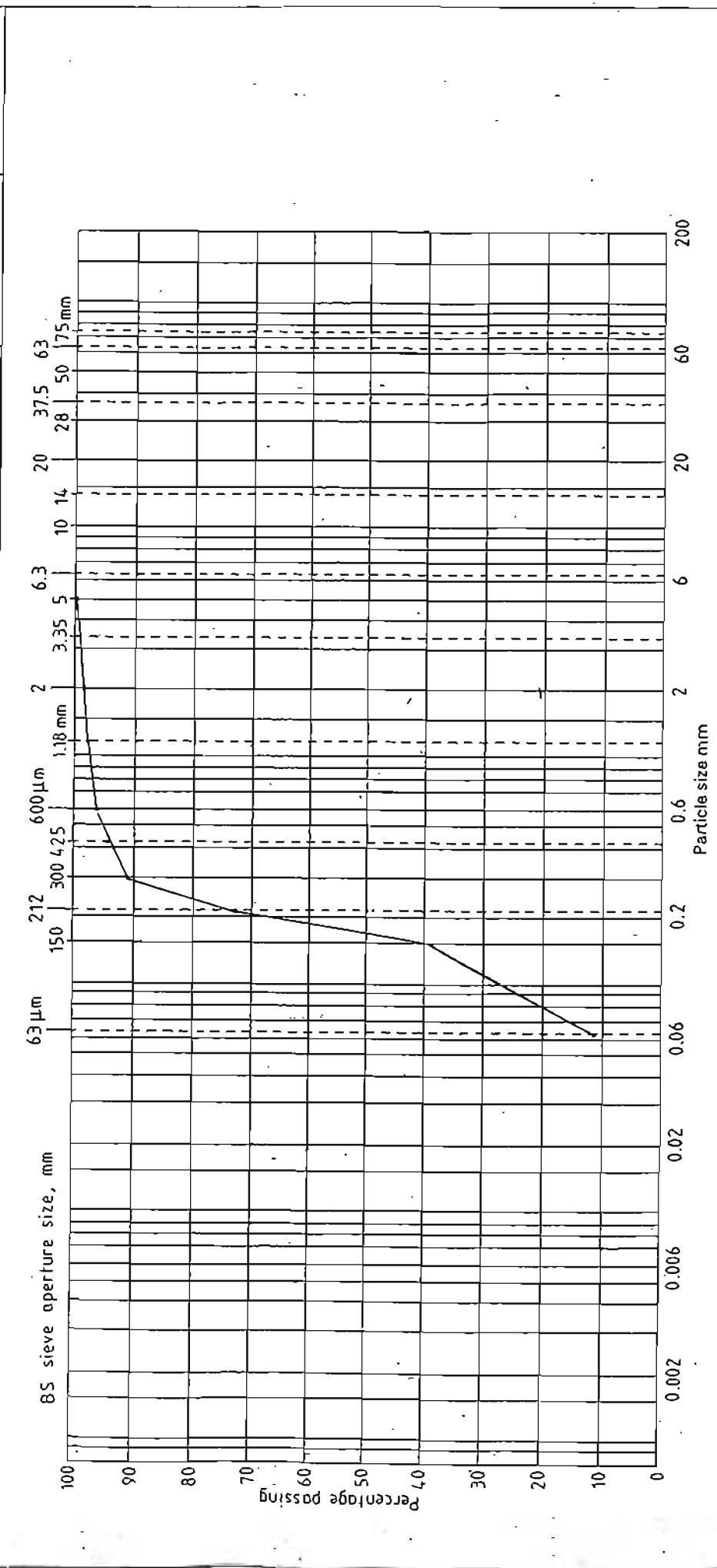
* Delete as appropriate

Technical Services Joint Committee
 Materials Laboratory
 Horbury Road
 Ossett
 Wakefield
 WF5 0BZ
 Telephone: (0924) 260621
 Fax: (0924) 279682



Particle size distribution chart

Location ELVINGTON	Soil description Brown fine to medium SAND with occasional fine gravel and small pockets of dark brown silt.	Job ref. S92P38	Sample no. S247
Test method BS 1377 : Part 2 : 1990 : 9.2/9.3/9.4/9.6/9.7 *		Borehole/Pit no. B	Depth - . . . m
			Date 21.10.92



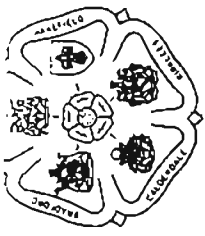
CLAY	Fine	Medium	Coarse	Fine	Medium	Coarse	Fine	Medium	Coarse	COBBLES	BOULDERS	
	SILT			GRAVEL							Checked	Approved
Operator D. H.										Checked		Approved

* Delete as appropriate



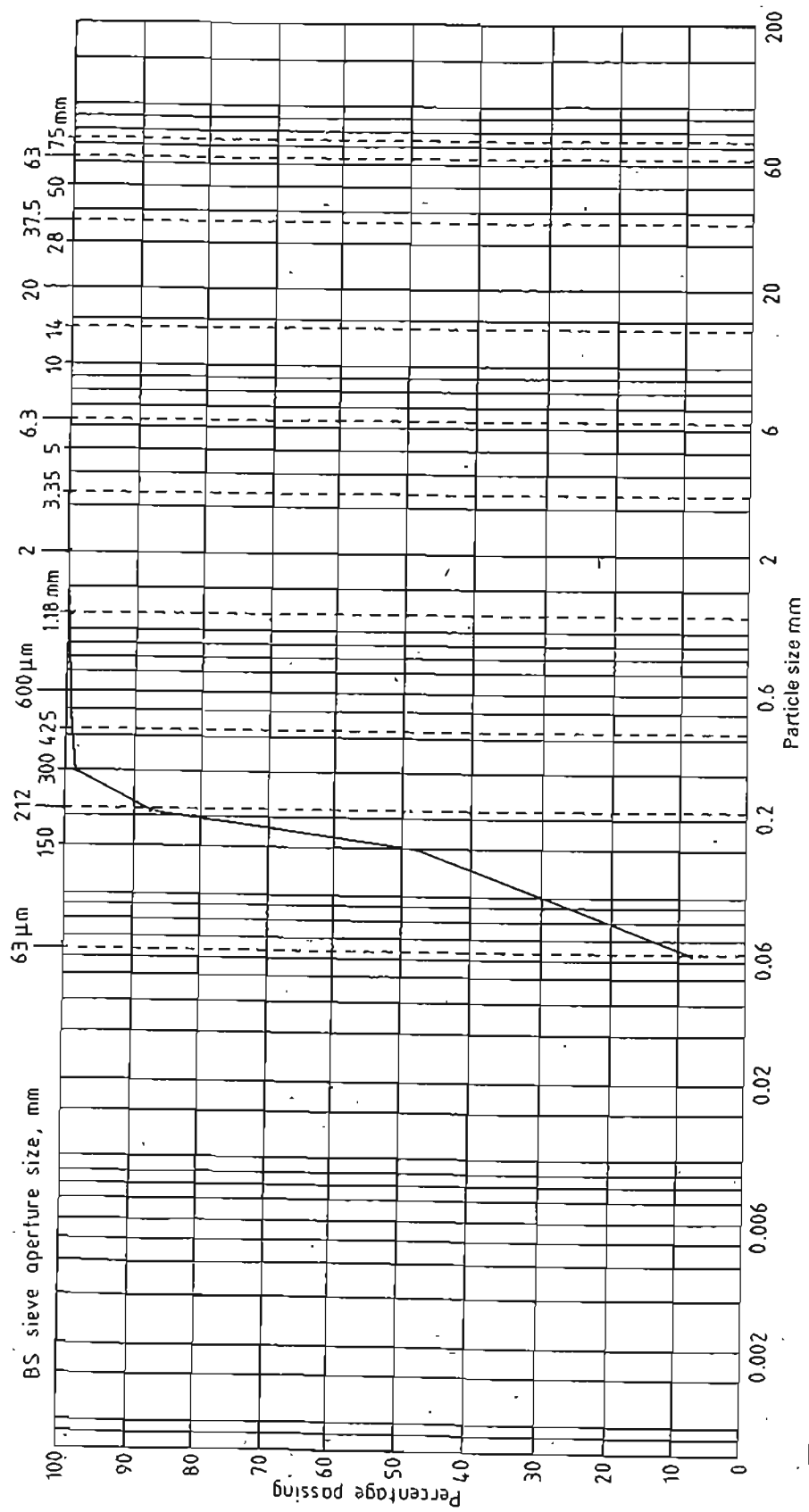
THE LOCAL AUTHORITY CONSULJANCY

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 Horbury Road
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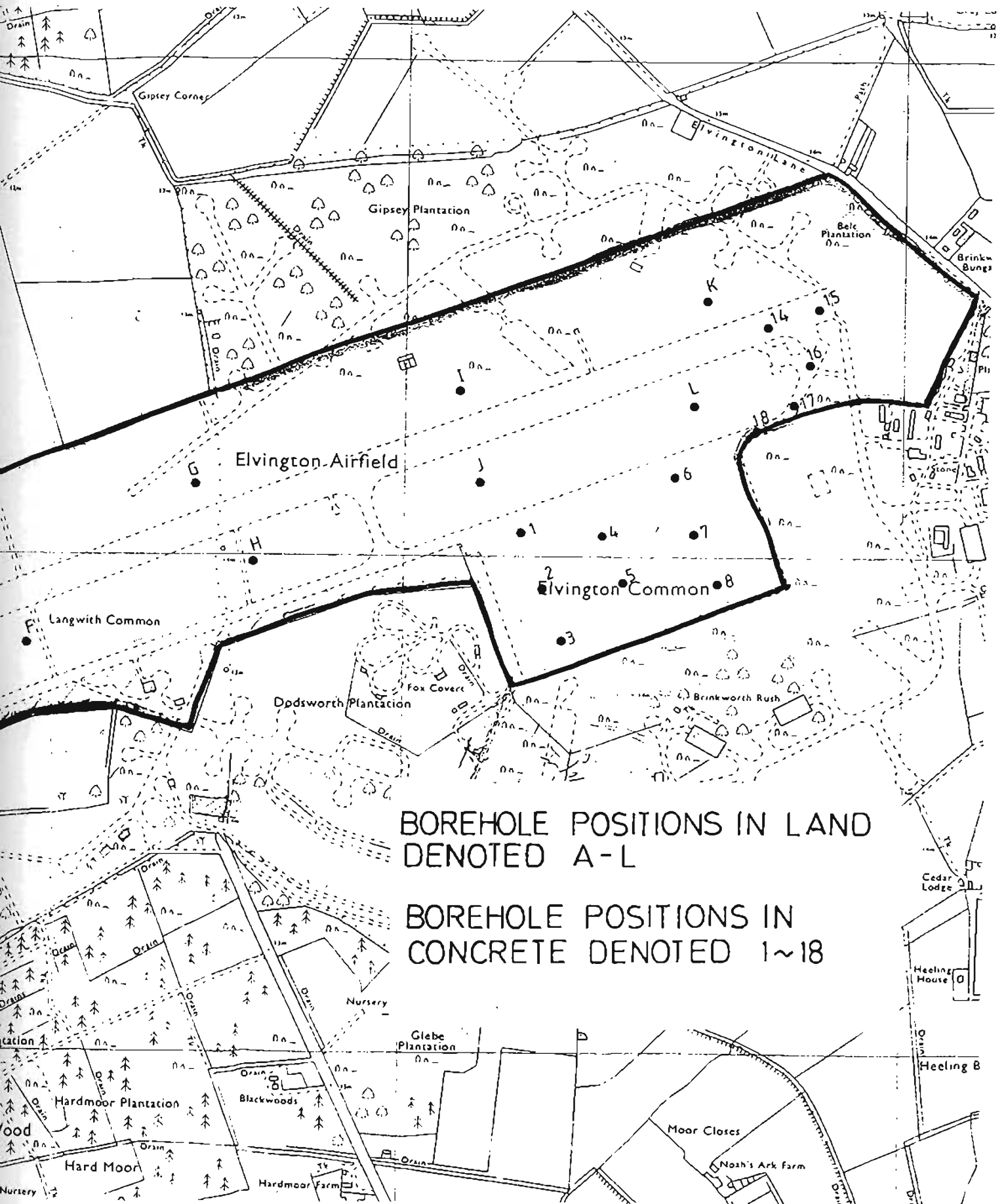
Particle size distribution chart

Location ELVINGTON	Soil description Brown fine with medium SAND with occasional fine gravel and small pockets of dark brown silt	Job ref. S92P38	Sample no. S248
Test method BS 1377: Part 2: 1990: 9.2/9.3/9.4/9.6/9.7 *		Borehole/Pit no. F	Depth m
			Date 22.10.92



CLAY	SILT		GRAVEL			COBBLES	BOULDERS
	Fine	Coarse	Fine	Medium	Coarse		
* Delete as appropriate							
				Operator D. H.		Checked Approved	

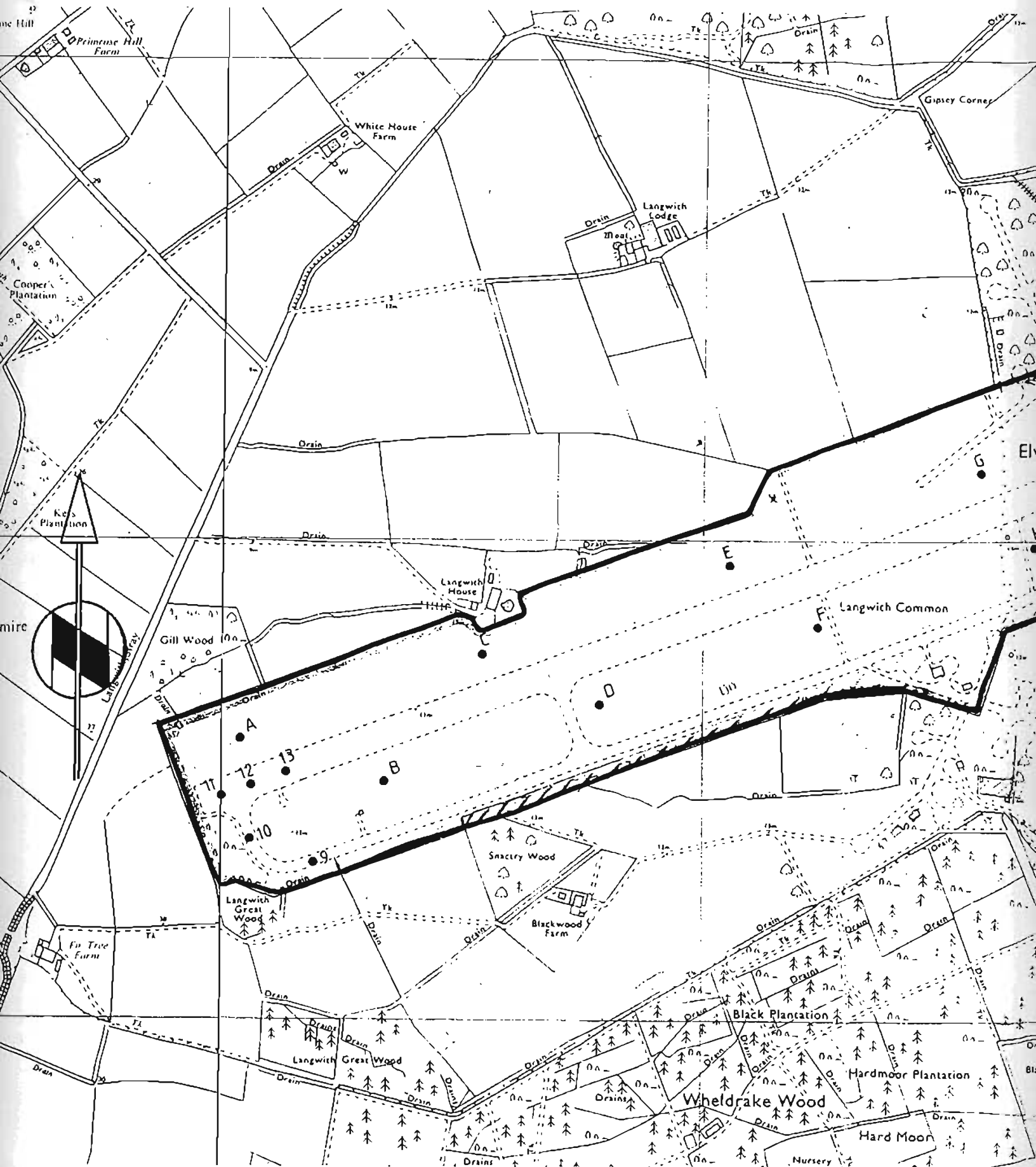
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BOREHOLE POSITIONS IN LAND
DENOTED A-L

BOREHOLE POSITIONS IN
CONCRETE DENOTED 1~18

MAP AT RAF ELVINGTON, NEAR YORK



Appendix G

CONTAMINATED LAND OFFICER RESPONSE



Communities & Neighbourhoods

Steve Waddington (Assistant Director)
Eco Depot, Hazel Court, James Street, York, YO10 3DS
Tel: 01904 551550
Fax: 01904 553239

Ms Emily Morgan
Ground Risk & Remediation
WSP Group
The Victoria
150-182 The Quays
Salford Quays
M50 3SP

Ask for: Lucie Hankinson
Phone: 01904 551533
E-mail: lucie.hankinson@york.gov.uk
Our Ref: RSA/LVH/188501

Date: 5 September 2016

Sent by email

Dear Ms Morgan,

Environmental Search Request: Site at Elvington, York

Thank you for your payment of £122 (plus a 2% credit card fee) which covers our fee for providing the requested environmental information. I have provided the information below on behalf of City of York Council's public protection service. Please see the enclosed environmental search report for further information.

Landfill Sites

Our records show that part of an Environment Agency registered landfill site, called Drome Farm, was located on the north east corner of the site. The landfill site was categorised as A6 (landfill accepting other wastes) and was operational between 1988 and 2015.

Another landfill site is located adjacent to the south east corner of the site. The landfill site, called Elvington Airfield Landfill, was categorised as A6 (landfill accepting other wastes) and was operational between 1992 and 2013.

If you require further information regarding these landfill sites, please contact the Environment Agency on telephone 03708 506 506.

Past Industrial Activities

Our records show that the southern half of the search site has been an airfield since the 1950s. We hold no records regarding the location of underground storage tanks, but the majority of the former/current airfield buildings are located to the east of the search site.

Various areas of unknown filled ground (i.e. infilled ponds or streams) were also located on the search site in 1854.

Known Contamination / Pollution Incidents

We have no record of any known contamination or pollution incidents occurring at the search site or in the near vicinity.

Continued.....



Part 2A Inspection List

At the present time the search site and the surrounding area have not been determined as "Contaminated Land" under Part 2A of the Environmental Protection Act 1990.

The search site and the surrounding area have previously been used for the activities outlined above. The airfield and the landfill sites are all included in our list of potentially contaminated sites and have been assigned a medium to high priority inline with our contaminated land strategy.

City of York Council currently has insufficient resources to fund the detailed inspection of potentially contaminated sites, so we have no plans to inspect the search site within the next five years. Please note that inclusion in our list of potentially contaminated sites does not mean that the past use has led to contamination or that the site is determined as „Contaminated Land“.

The information provided is based on that currently available to City of York Council. The council and its officers accept no liability for any loss or damage arising from the interpretation or use of this information.

Please do not hesitate to contact me if you have any queries.

Yours sincerely



Lucie Hankinson
Senior Contaminated Land Officer



Environmental Search Report

**Public Protection
City of York Council
Eco Depot, Hazel Court
James Street
York
YO10 3DS**

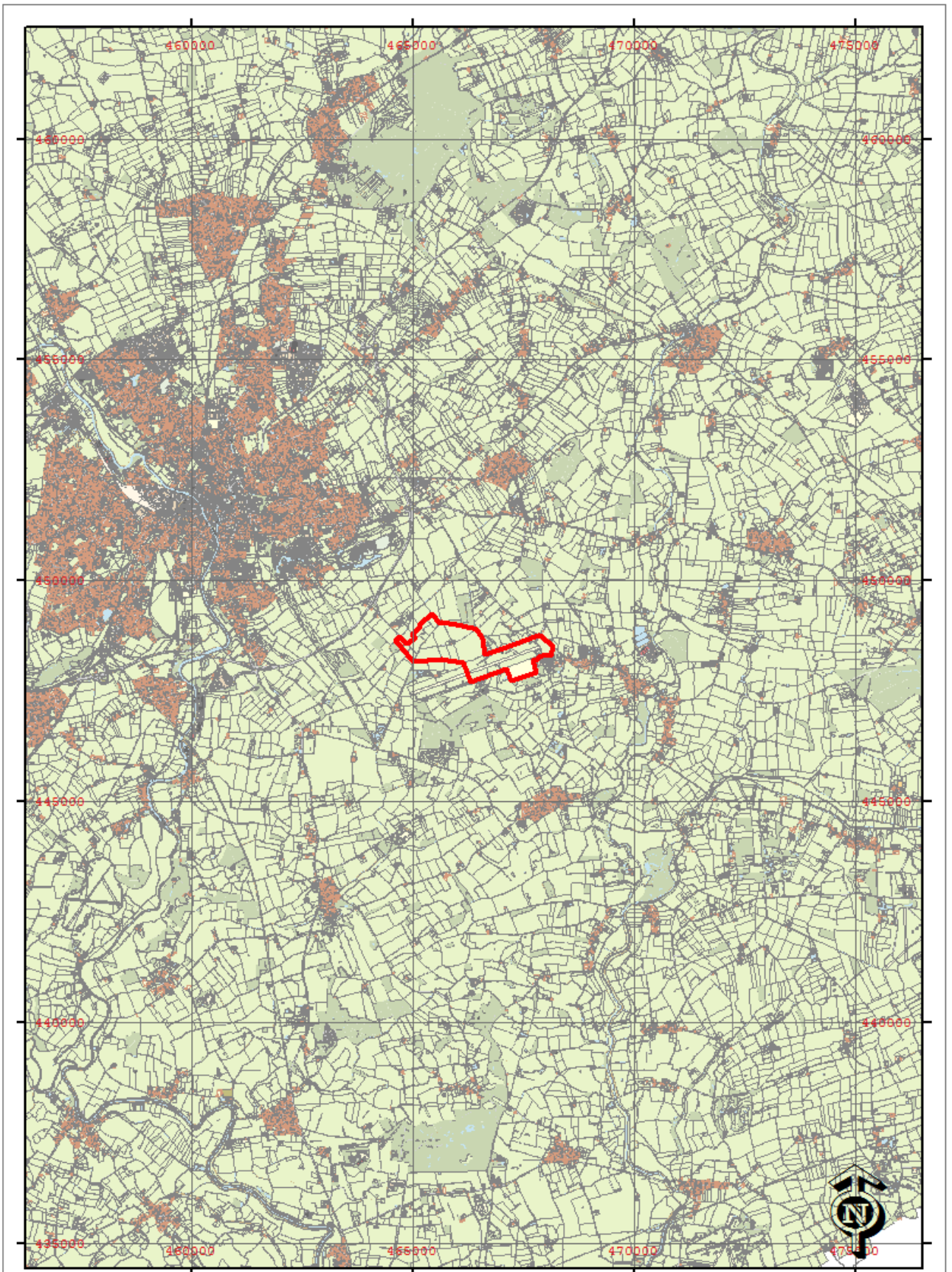
**Tel: 01904 551525
Fax: 01904 551590**

public.protection@york.gov.uk

www.york.gov.uk

Report Name: Site at Elvington, York

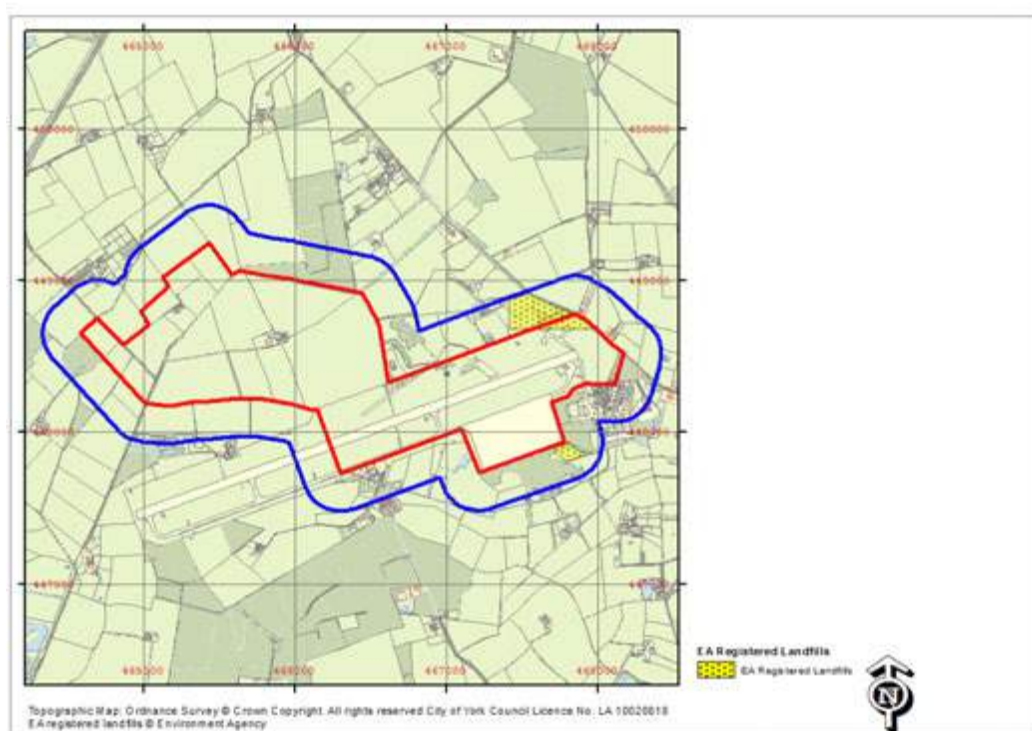
Report Number: 188501



Topographic Map: Ordnance Survey © Crown Copyright. All rights reserved City of York Council Licence No. LA 10020818

Waste Disposal Sites

EA Registered Landfill Sites



The map shows the site (red) and a search radius of 250 metres (blue).

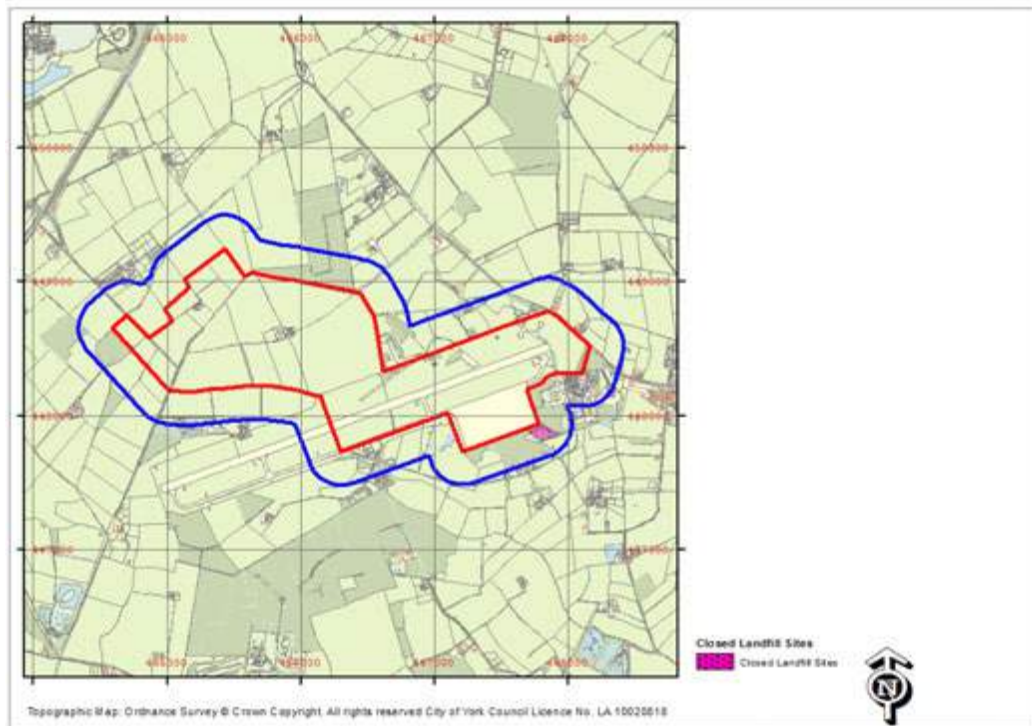
Site Results

Site Name	Licence Name	NGR	Type Description
Drome Farm	Handley R F	0SE6760048800	A6 : Landfill taking other wastes

Search Radius Results

Site Name	Licence Name	NGR	Type Description
Elvington Airfield Landfill	William Birch & Sons Ltd	0SE6790047900	A6 : Landfill taking other wastes
Drome Farm	Handley R F	0SE6760048800	A6 : Landfill taking other wastes

Closed Landfill Sites (Pre 1974)



The map shows the site (red) and a search radius of 250 metres (blue).

Site Results

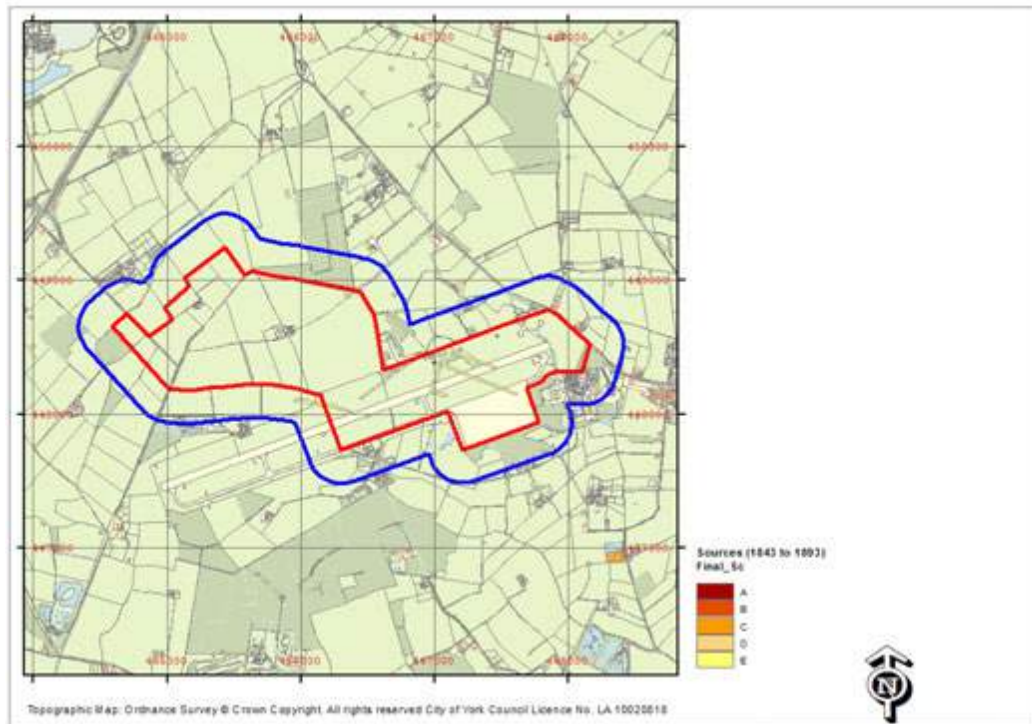
No Pre 1974 Landfills at the site

Search Radius Results

Name	Operative	Nat Grid Ref	Material	Comments
Elvington Airfield Landfill, Elvington	1992-2013	SE679479	Not known	Not yet investigated under Part 2A

Potentially Contaminated Sites

Former Industrial Sites (1843 – 1893)



The map shows the site (red) and a search radius of 250 metres (blue).

Site Results

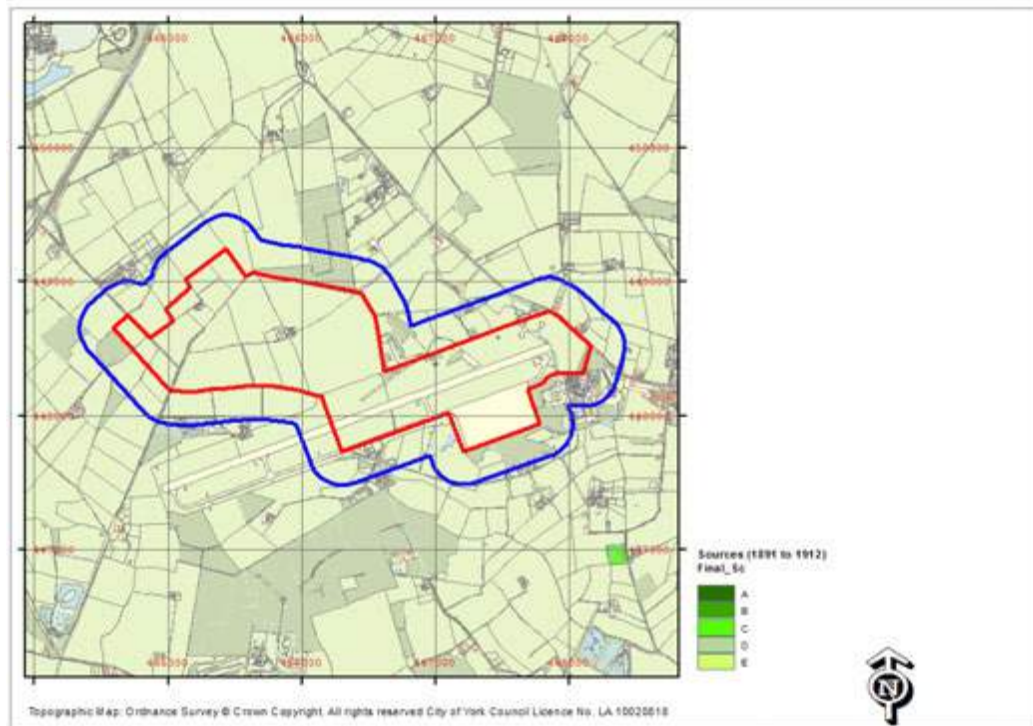
Site Ref	Description	Date	Comments
1843_669	Unknown Filled Ground (Pond, marsh, river, stream,dock etc)	1854	Not yet investigated under Part 2A
1843_670	Unknown Filled Ground (Pond, marsh, river, stream,dock etc)	1854	Not yet investigated under Part 2A
1843_671	Unknown Filled Ground (Pond, marsh, river, stream,dock etc)	1854	Not yet investigated under Part 2A
1843_672	Unknown Filled Ground (Pond, marsh, river, stream,dock etc)	1854	Not yet investigated under Part 2A
1843_673	Unknown Filled Ground (Pond, marsh, river, stream,dock etc)	1854	Not yet investigated under Part 2A
1843_755	Unknown Filled Ground (Pond, marsh, river, stream,dock etc)	1854	Not yet investigated under Part 2A
1843_772	Unknown Filled Ground (Pond, marsh, river, stream,dock etc)	1854	Not yet investigated under Part 2A
1843_788	Unknown Filled Ground (Pond, marsh, river, stream,dock etc)	1853	Not yet investigated under Part 2A

Search Radius Results

Site Ref	Description	Date	Comments
1843_669	Unknown Filled Ground (Pond, marsh, river, stream,dock etc)	1854	Not yet investigated under Part 2A

Site Ref	Description	Date	Comments
1843_753	Unknown Filled Ground (Pond, marsh, river, stream,dock etc)	1854	Not yet investigated under Part 2A
1843_754	Unknown Filled Ground (Pond, marsh, river, stream,dock etc)	1854	Not yet investigated under Part 2A
1843_773	Unknown Filled Ground (Pond, marsh, river, stream,dock etc)	1854	Not yet investigated under Part 2A
1843_788	Unknown Filled Ground (Pond, marsh, river, stream,dock etc)	1853	Not yet investigated under Part 2A

Former Industrial Sites (1891 – 1912)



The map shows the site (red) and a search radius of 250 metres (blue).

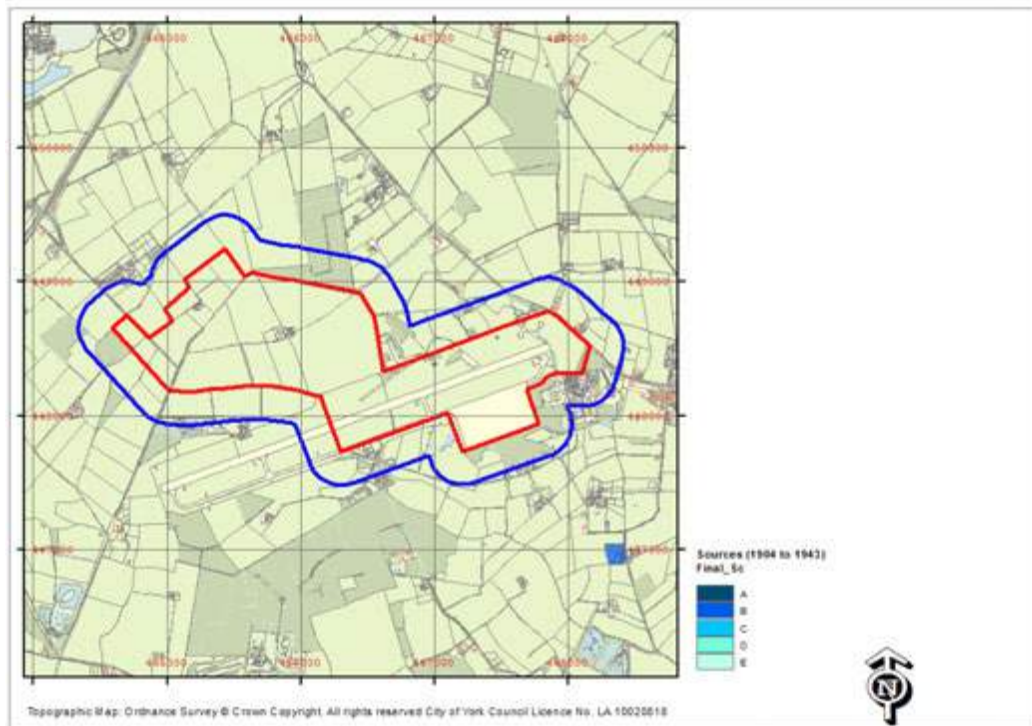
Site Results

No potentially contaminated sites (1891 to 1912) at the site

Search Radius Results

No potentially contaminated sites (1891 to 1912) in the search radius

Former Industrial Sites (1904 – 1943)



The map shows the site (red) and a search radius of 250 metres (blue).

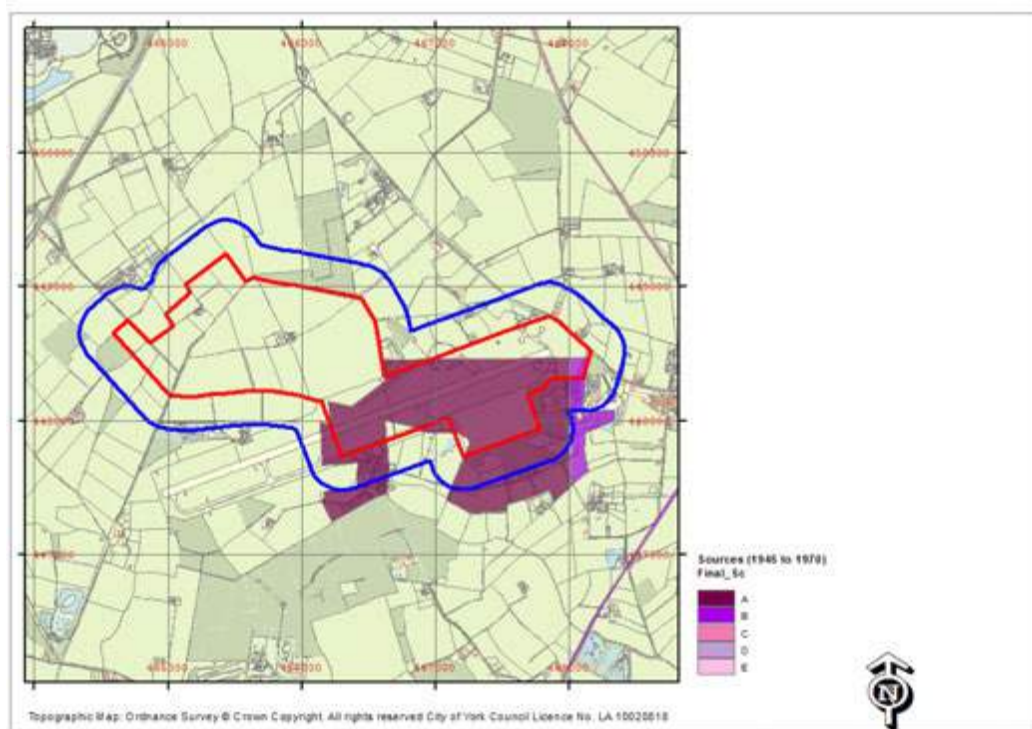
Site Results

No potentially contaminated sites (1904 to 1943) at the site

Search Radius Results

No potentially contaminated sites (1904 to 1943) in the search radius

Former Industrial Sites (1945 to 1970)



The map shows the site (red) and a search radius of 250 metres (blue).

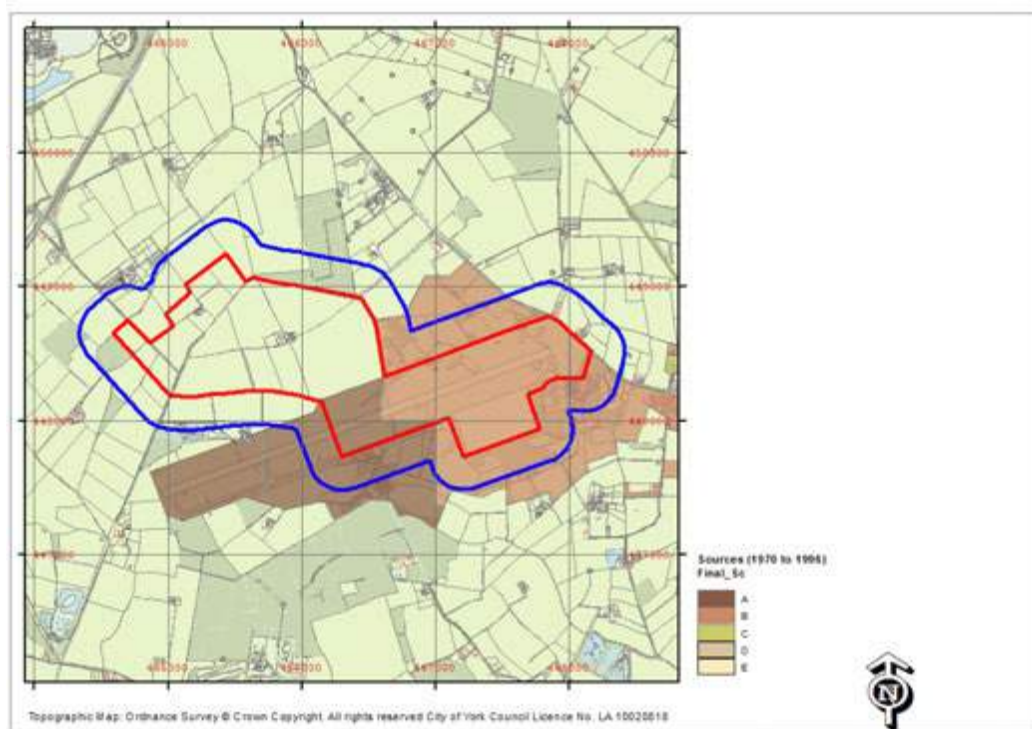
Site Results

Site Ref	Description	Date	Comments
1945_996	Military Land	1952	Not yet investigated under Part 2A
1945_997	Military Land	1952	Not yet investigated under Part 2A

Search Radius Results

Site Ref	Description	Date	Comments
1945_996	Military Land	1952	Not yet investigated under Part 2A
1945_997	Military Land	1952	Not yet investigated under Part 2A

Former Industrial Sites (1970 to 1996)



The map shows the site (red) and a search radius of 250 metres (blue).

Site Results

Site Ref	Description	Date	Comments
1970_82	Military Land	1972	Not yet investigated under Part 2A
1970_83	Military Land	1972	Not yet investigated under Part 2A
1970_93	Military Land	1972	Not yet investigated under Part 2A

Search Radius Results

Site Ref	Description	Date	Comments
1970_82	Military Land	1972	Not yet investigated under Part 2A
1970_83	Military Land	1972	Not yet investigated under Part 2A
1970_93	Military Land	1972	Not yet investigated under Part 2A

Important

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Appendix H

ANIMAL AND PLANT HEALTH AGENCY RESPONSE



**Animal &
Plant Health
Agency**

Animal and Plant Health Agency
Whitley Road
Longbenton
Newcastle upon Tyne
Tyne & Wear
NE12 9SE

T 03000 200301
F 0191 215 3080
www.gov.uk/apha

F.A.O. Emily Morgan
Parsons Brinckerhoff
The Victoria
150-182 The Quays
Salford
M50 3SP

12th September 2016

Dear Emily

RE: Notifiable Disease – Burial Sites

With reference to your email enquiry dated 5th September 2016, regarding land at Elvington, York. We do not have any records of any burials within your proposed development area.

Please note that it is illegal to dig up any carcase or part of a carcase under the Animal Health Act 1981, you should cease work and contact this office immediately if you come across any such remains in the course of your operations. An Officer from the AHVLA will then visit the site and advise on the safe disposal of the remains and issue you with a licence to authorise this. Advice will also be given on the cleansing and disinfection of any machinery used. No carcase should be touched by hand unless protective clothing is worn.

Please refer to the enclosed copy of the Code of Practice relating to precautions to prevent the spread of animal and poultry diseases.

Please do not hesitate to contact the above office if you require further assistance.

Yours sincerely,

John Stephenson

Animal Health Officer

Animal and Plant Health Agency (APHA)

Telephone: 03000 200301 Email: englandnorthrdz@apha.gsi.gov.uk

Website: www.gov.uk/apha | Twitter: [@APHAgovuk](https://twitter.com/APHAgovuk) | Facebook: [aphagov](https://www.facebook.com/aphagov)

Address: Veterinary & Technical Support Team, APHA, Whitley Road, Longbenton,
Newcastle upon Tyne, NE12 9SE

Appendix I

LIMITATIONS

REPORT LIMITATIONS - GROUND RISK AND REMEDIATION

GENERAL

1. WSP UK Limited has prepared this report solely for the use of the Client and those parties with whom a warranty agreement has been executed, or with whom an assignment has been agreed and outlined in the body of the report.
2. Unless explicitly agreed otherwise, in writing, this report has been prepared under WSP UK Limited standard Terms and Conditions as included within our proposal to the Client.
3. Project specific appointment documents may be agreed at our discretion and a charge may be levied for both the time to review and finalise appointments documents and also for associated changes to the appointment terms. WSP UK Limited reserves the right to amend the fee should any changes to the appointment terms create an increase risk to WSP UK Limited.
4. The report needs to be considered in the light of the WSP UK Limited proposal and associated limitations of scope. The report needs to be read in full and isolated sections cannot be used without full reference to other elements of the report and any previous works referenced within the report.

PHASE 1 GEO ENVIRONMENTAL AND PRELIMINARY RISK ASSESSMENTS

Coverage: *This section covers reports with the following titles or combination of titles: phase 1; desk top study; geo environmental assessment; development appraisal; preliminary environmental risk assessment; constraints report; due diligence report; geotechnical development review; environmental statement; environmental chapter; project scope summary report (PSSR), program environmental impact report (PEIR), geotechnical development risk register; and, baseline environmental assessment.*

5. The works undertaken to prepare this report comprised a study of available and easily documented information from a variety of sources (including the Client), together with (where appropriate) a brief walk over inspection of the Site and correspondence with relevant authorities and other interested parties. Due to the short timescales associated with these projects responses may not have been received from all parties. WSP UK Limited cannot be held responsible for any disclosures that are provided post production of our report and will not automatically update our report.
6. The opinions given in this report have been dictated by the finite data on which they are based and are relevant only for the purpose for which the report was commissioned. The information reviewed should not be considered exhaustive and has been accepted in good faith as providing true and representative data pertaining to site conditions. Should additional information become available which may affect the opinions expressed in this report, WSP UK Limited reserves the right to review such information and, if warranted, to modify the opinions accordingly.
7. It should be noted that any risks identified in this report are perceived risks based on the information reviewed. Actual risks can only be assessed following intrusive investigations of the site.
8. WSP UK Limited does not warrant work / data undertaken / provided by others.

REPORT LIMITATIONS - GROUND RISK AND REMEDIATION

INTRUSIVE INVESTIGATION REPORTS

Coverage: *The following report titles (or combination) may cover this category of work: geo environmental site investigation; geotechnical assessment; GIR (Ground Investigation reports); preliminary environmental and geotechnical risk assessment; and, geotechnical risk register.*

9. The investigation has been undertaken to provide information concerning either:
 - i. The type and degree of contamination present at the site in order to allow a generic quantitative risk assessment to be undertaken; or
 - ii. Information on the soil properties present at the site to allow for geotechnical development constraints to be considered.
10. The scope of the investigation was selected on the basis of the specific development and land use scenario proposed by the Client and may be inappropriate to another form of development or scheme. If the development layout was not known at the time of the investigation the report findings may need revisiting once the development layout is confirmed.
11. For contamination purposes, the objectives of the investigation are limited to establishing the risks associated with potential contamination sources with the potential to cause harm to human health, building materials, the environment (including adjacent land), or controlled waters.
12. For geotechnical investigations the purpose is to broadly consider potential development constraints associated with the physical property of the soils underlying the site within the context of the proposed future or continued use of the site, as stated within the report.
13. The amount of exploratory work, soil property testing and chemical testing undertaken has necessarily been restricted by various factors which may include accessibility, the presence of services; existing buildings; current site usage or short timescales. The exploratory holes completed assess only a small percentage of the area in relation to the overall size of the Site, and as such can only provide a general indication of conditions.
14. The number of sampling points and the methods of sampling and testing do not preclude the possible existence of contamination where concentrations may be significantly higher than those actually encountered or ground conditions that vary from those identified. In addition, there may be exceptional ground conditions elsewhere on the site which have not been disclosed by this investigation and which have therefore not been taken into account in this report.
15. The inspection, testing and monitoring records relate specifically to the investigation points and the timeframe that the works were undertaken. They will also be limited by the techniques employed. As part of this assessment, WSP UK Limited has used reasonable skill and care to extrapolate conditions between these points based upon assumptions to develop our interpretation and conclusions. The assumption made in forming our conclusions is that the ground and groundwater conditions (both chemically and physically) are the same as have been encountered during the works undertaken at the specific points of investigation. Conditions can change between investigation points and these interpretations should be considered indicative.
16. The risk assessment and opinions provided are based on currently available guidance relating to acceptable contamination concentrations; no liability can be accepted for the retrospective

REPORT LIMITATIONS - GROUND RISK AND REMEDIATION

effects of any future changes or amendments to these values. Specific assumptions associated with the WSP UK Limited risk assessment process have been outlined within the body or associated appendix of the report.

17. Additional investigations may be required in order to satisfy relevant planning conditions or to resolve any engineering and environmental issues.
18. Where soil contamination concentrations recorded as part of this investigation are used for commentary on potential waste classification of soils for disposal purposes, these should be classed as indicative only. Due consideration should be given to the variability of contaminant concentrations taken from targeted samples versus bulk excavated soils and the potential variability of contaminant concentrations between sampling locations. Where major waste disposal operations are considered, targeted waste classification investigations should be designed.
19. The results of the asbestos testing are factually reported and interpretation given as to how this relates to the previous use of the site, the types of ground encountered and site conceptualisation. This does not however constitute a formal asbestos assessment. These results should be treated cautiously and should not be relied upon to provide detailed and representative information on the delineation, type and extent of bulk ACMs and / or trace loose asbestos fibres within the soil matrix at the site.
20. If costs have been included in relation to additional site works, and / or site remediation works these must be considered as indicative only and must be confirmed by a qualified quantity surveyor.

EUROCODE 7: GEOTECHNICAL DESIGN

21. On 1st April 2010, BS EN 1997-1:2004 (Eurocode 7: Geotechnical Design – Part 1) became the mandatory baseline standard for geotechnical ground investigations.
22. In terms of geotechnical design for foundations, slopes, retaining walls and earthworks, EC7 sets guidance on design procedures including specific guidance on the numbers and spacings of boreholes for geotechnical design, there are limits to methods of ground investigation and the quality of data obtained and there are also prescriptive methods of assessing soil strengths and methods of design. Unless otherwise explicitly stated, the work has not been undertaken in accordance with EC7. A standard geotechnical interpretative report will not meet the requirements of the Geotechnical Design Report (GDR) under Eurocode 7. The GDR can only be prepared following confirmation of all structural loads and serviceability requirements. The report is likely to represent a Ground Investigation Report (GIR) under the Eurocode 7 guidance.

DETAILED QUANTITATIVE RISK ASSESSMENTS AND REMEDIAL STRATEGY REPORTS

23. These reports build upon previous report versions and associated notes. The scope of the investigation, further testing and monitoring and associated risk assessments were selected on the basis of the specific development and land use scenario proposed by the Client and may not be appropriate to another form of development or scheme layout. The risk assessment and opinions provided are based on currently available approaches in the generation of Site Specific Assessment Criteria relating to contamination concentrations and are not considered to represent a risk in a specific land use scenario to a specific receptor. No liability can be

REPORT LIMITATIONS - GROUND RISK AND REMEDIATION

accepted for the retrospective effects of any future changes or amendments to these values, associated models or associated guidance.

24. The outputs of the Detailed Quantitative Risk Assessments are based upon WSP UK Limited manipulation of standard risk assessment models. These are our interpretation of the risk assessment criteria.
25. Prior to adoption on site they will need discussing and agreeing with the Regulatory Authorities prior to adoption on site. The regulatory discussion and engagement process may result in an alternative interpretation being determined and agreed. The process and timescales associated with the Regulatory Authority engagement are not within the control of WSP UK Limited. All costs and programmes presented as a result of this process should be validated by a quantity surveyor and should be presumed to be indicative.

GEOTECHNICAL DESIGN REPORT (GDR)

26. The GDR can only be prepared following confirmation of all structural loads and serviceability requirements. All the relevant information needs to be provided to allow for a GDR to be produced.

MONITORING (INCLUDING REMEDIATION MONITORING REPORTS)

27. These reports are factual in nature and comprise monitoring, normally groundwater and ground gas and data provided by contractors as part of an earthworks or remedial works.
28. The data is presented and will be compared with assessment criteria.



APPENDIX 11

FLOOD RISK AND SURFACE WATER MANAGEMENT TECHNICAL APPRAISAL

REPORT 70011808-RPT-001

LANGWITH GARDEN VILLAGE

FLOOD RISK AND SURFACE WATER
MANAGEMENT TECHNICAL APPRAISAL

SEPTEMBER 2016

LANGWITH GARDEN VILLAGE FLOOD RISK AND SURFACE WATER MANAGEMENT TECHNICAL APPRAISAL

Sandby/Oakgate/Caddick Groups

Revision 2
Project no: 70011808
Date: September 2016

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QUALITY MANAGEMENT

ISSUE/REVISION	FIRST ISSUE	REVISION 1	REVISION 2	REVISION 3
Remarks	For Comment	Updated with comments	Final comments	
Date	31.08.2016	02.09.16	06.09.16	
Prepared by	Matthew Wilson-Wright	Matthew Wilson-Wright	Matthew Wilson-Wright	
Signature				
Checked by	Chris Scott	Chris Cozens	Chris Cozens	
Signature				
Authorised by	Chris Cozens	Chris Cozens	Chris Cozens	
Signature				
Project number	70011808			
Report number	70011808 –rpt-001			
File reference	T:\70011808 - Whinthorpe Development, York\C Documents\Reports			

PRODUCTION TEAM

CLIENT

Sandby

Oakgate/Caddick Groups

WSP | PARSONS BRINCKERHOFF

Project Director

Chris Cozens

Associate

Matthew Wilson-Wright

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APPENDICES

A P P E N D I X A POTENTIAL FORM (CONCEPT ONLY) OF FUTURE DEVELOPMENT OF THE SITE

APPENDIX A-1 DRAWING 23910.9610 – CONCEPT MASTERPLAN – REV -).

EXECUTIVE SUMMARY

WSP Parsons Brinckerhoff has been appointed by Sandby and Oakgate/Caddick Group to provide a technical appraisal of the flood risk and surface water management characteristics associated with a proposed development known as Langwith Garden Village. It is submitted in support of the site's allocation for a new sustainable settlement within the City of York Council's emerging allocation within its Local Plan (preferred sites consultation).

FLOOD RISK

The development site is located in a potentially sensitive region with respect to fluvial flood risk. Historically the City of York and Elvington have suffered significant and damaging fluvial flooding, the most recently on Boxing Day 2015. Therefore due consideration of flood risk issues is an important consideration in the development of this site.

The Environment Agency map show most of the proposed development site as in Flood Zone 1 (which has a low annual probability of fluvial flooding) but suggests a possibility of isolated areas of Flood Zone 2 and Flood Zone 3 associated with the Langwith Drain in the northern part of development site.

Previous consultations with the Environment Agency, City of York Council and the Ouse and Derwent IDB undertaken during 2013/2014 with regard to the flood risk predictions on the Tilmire and Langwith Drains, confirmed that there are no detailed flood levels, associated with fluvial flood risk from these drains). It was confirmed that the flood risk mapping for this area was produced using a generalised national scale modelling approach to provide a strategic indication of the likely flood risk, but does not include local detail (that will affect the accuracy of local flood risk map). It is generally accepted by these parties that the Environment Agency flood mapping does not fully and accurately represent the flood risk associated with the Tilmire and Langwith Drains, which are indicated to be the source of local flood risk in this area, which are shown in the maps to affect the allocation site.

There is a small area of the development site boundary in the north-western corner, which is indicated to still retain a higher degree of flood risk associated with this portion of land. The elevated flood risk in this area has been accounted for in the development of the masterplan for the site, as illustrated in the drawing of the potential form (concept only) of the future development in Appendix A.

The results from the hydraulic modelling undertaken were discussed with the Environment Agency and they confirmed that they would have no objections to development from a flood risk perspective, given that the commentary on the built development for the emerging masterplans indicated no such built development areas would be in any high risk flood zones.

The modelling predictions have been tested against the Boxing Day 2015 and January 2016 floods which also showed no signs of flooding on the northern part of the proposed development site.

The site is therefore deemed entirely appropriate for development in respect to flood risk.

SURFACE WATER MANAGEMENT

The northern and central part of the proposed development site comprises predominantly agricultural land (greenfield land), drained by a series of riparian drains and ditches which convey surface water to the IDB controlled drainage network.

The southern part of the proposed development site is an airfield with large areas of impermeable concrete hard-standing. It has an existing and highly effective below ground drainage system which serves both the concrete and grassed areas, discharging quickly into the surrounding IDB system (predominantly the Langwith Drain with a small area draining south to the Heeling Dyke and thence to the River Derwent).

The proposed development of the site will result in a potentially significant increase in generated surface water run-off and therefore the development of the site will incorporate a surface water management system that manages the run-off, and restricts discharges into the surrounding drainage network to sustainable levels, in accordance with criteria agreed with the Ouse and Derwent IDB who have primary responsibility for the local area drainage network.

The proposed development will incorporate a Sustainable urban Drainage System (SuDS): the scale and nature of the development will afford the opportunity to develop a robust and sustainable system which will incorporate surface water attenuation storage to retain surface water run-off 'at-source' on site. This will mimic the performance of natural catchments and restrict discharges to the surrounding water courses to acceptable levels, without many of the constraints of smaller developments with greater competition for land needs. The system will be able to promote bio-diversity through creation and enhancement of green spaces and corridors and provide high quality amenity through a holistic design of the development.

The benefits of the surface water management system are not restricted to the site itself but through sensitive, high quality and innovative design can afford substantial benefits and enhancements to the surrounding area:

- Run-off from the site will be significantly reduced in time of heavy and prolonged rainfall which currently will exceed 'greenfield' rates because of waterlogged and saturated ground, reducing load in the drainage system and reducing downstream flood risk.
- There is also the opportunity as part of the development (albeit outside the proposed development red-line boundary) to provide ecological enhancement of parts of the Tilmire including a buffer to the SSSI and potentially improved habitat on what is currently arable farmland. This would include (with the agreement and cooperation of the IDB, etc.) soft engineering to allow periodic controlled flooding of designated areas. Currently such flooding is a natural, seasonal phenomenon but there is the potential to provide through the development surface water management system a method for a more controlled and frequent water source (e.g. reducing heavy intermittent inundations) as well as easing peak flows through the Tilmire, thereby further reducing downstream flood risk.
- There is an opportunity, working with the Ouse and Derwent IDB, to improve the discharges to and performance of parts of their network aligned with the IDB's aims.

The key design parameters for the surface water management system include:

- Design of the system to accommodate surface water generated by the critical 1 in 100 year storm with an allowance for climate change (incorporating the latest Environment Agency

guidance which currently stands at between 20% and 40% increase in rainfall intensities) without flooding to development or uncontrolled discharge off the development site.

- Design the development to be robust against exceedance events (i.e. rare events in excess of the 1 in 100 year storm, by incorporating suitable overland flow routes for surface water channelled away from sensitive development.

Outline preliminary design using WinDes Microdrainage has identified that approximately 10% of the development site should be earmarked for SuDS, which has been incorporated into the development masterplan (by Urbed and Barton Willmore)

With respect to the information provided above, it is therefore considered that methods can be practically adopted that deem the development entirely appropriate with regard to surface water management control.

1 INTRODUCTION

1.1 APPOINTMENT

- 1.1.1 WSP Parsons Brinckerhoff has been appointed by the Sandby/Oakgate/Caddick Groups to provide a technical appraisal of the flood risk and surface water management characteristics associated with a proposed development known as Langwith Garden Village. It is submitted in support of the sites allocation for a new sustainable settlement within the City of York Councils' emerging allocation within its Local Plan (preferred sites consultation).

1.2 SCOPE

- 1.2.1 This report considers the flood risk to the site and any constraints this might impose on its proposed development. It also considers the impact that the proposed development of the site might have on flood risk to the surrounding land and watercourses and the opportunities afforded by the development to mitigate and or improve that risk.
- 1.2.2 Intrinsically linked to flood risk are the surface water drainage characteristics of the site and its surrounds and the impact this will have on the development (and vice versa). This report therefore also gives consideration to the surface water management issues and opportunities associated with the development of this site, and the surrounding areas.

1.3 SITE DESCRIPTION

- 1.3.1 The proposed development site is located on the outskirts of York (south of the A64) in close proximity to the existing settlement of Elvington. It covers a large area of land from Elvington Airfield running north-west towards the Tilmire Drain. The proposed development will include an access off Elvington Lane (on the site's eastern boundary) with realignment of Elvington Lane to provide an improved junction with Hull Road, and a new link road north across the Tilmire onto a new road junction with the A64.
- 1.3.2 A plan indicating the potential form (concept only) of the future development of the site is included in Appendix A (Drawing 23910.9610 – Concept Masterplan – Rev -).
- 1.3.3 The future development of the allocation site would provide 5000 residential units as well as associated commercial, community and education provisions within the boundary of the site.
- 1.3.4 There is potential for further land to become available adjacent to the site (Handley Land), which could provide space for some additional 500 development units, although this additional area of land does not form part of this proposed allocation.

2 FLOOD RISK

2.1 SITE CONTEXT

2.1.1 The development site is located in a potentially sensitive region with respect to fluvial flood risk. Historically the City of York and Elvington have suffered significant and damaging fluvial flooding, the most recently on Boxing Day 2015. Therefore due consideration of flood risk issues is an important consideration in the development of this site.

2.1.2 Rivers and significant watercourses within the proximity of the site include:

- The River Ouse which is a main river running through the centre of the City of York and downstream through Selby and Goole to the Humber Estuary is approximately 6.5km to the west of the site.
- The River Derwent which is approx. 3.8 km to the east of the site and flows adjacent to Elvington before joining the River Ouse near Drax south east of Selby.
- The Tilmire Drain to the north of the site (see drawing 23910.9610 – Concept Masterplan – Rev -in Appendix A).
- The Langwith Drain which flows west through the northern part of the site after which it joins the Tilmire Drain and thence to the Ouse.
- The Heeling Dyke which runs from close to the southern edge of the site, south into the River Derwent.

There is additionally a network of smaller surface water ditches and drains around the site, many of which are managed and controlled by the Ouse and Derwent Internal Drainage Board (IDB).

2.2 FLUVIAL FLOOD RISK

2.2.1 Environment Agency maps provide an indicative probability of flooding throughout England. They include maps for Planning which identify the risk of fluvial (river and sea) flooding in any given location in the form of Flood Zones, which are defined as follows:-

FLOOD ZONE	HEADING
Flood Zone 1	Land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)
Flood Zone 2	Land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year
Flood Zone 3	Land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year

Table 2-1 Definitions of Flood Risk for Planning – Flood Zone Classification.

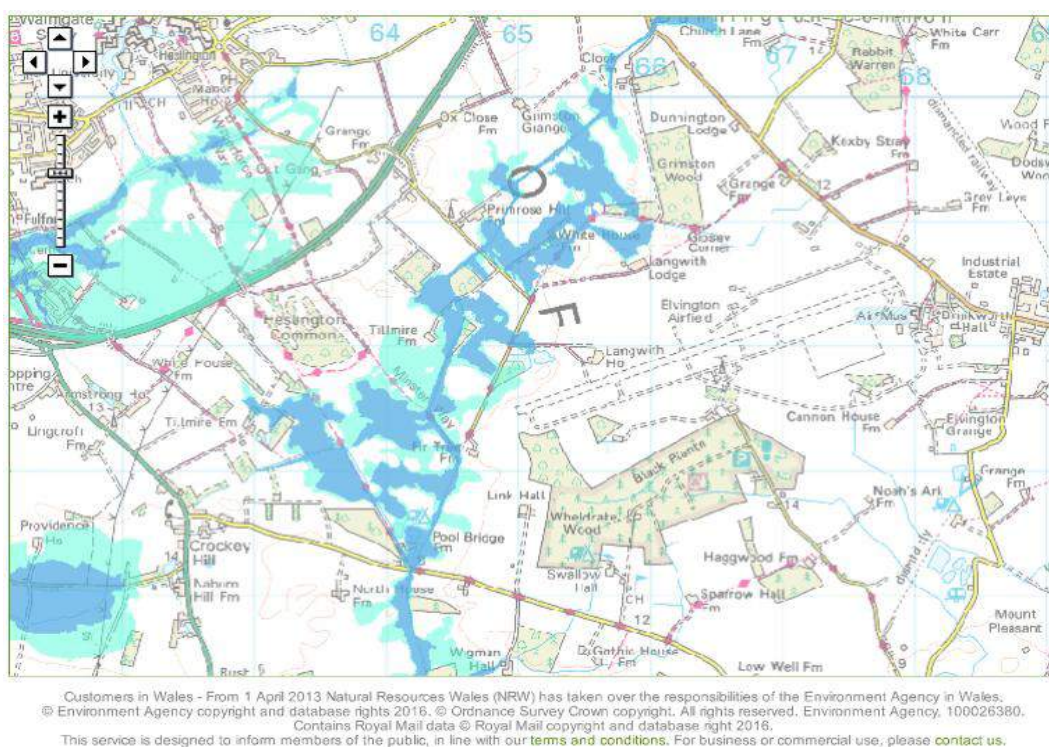


Figure 2-1 Environment Agency flood risk for planning map

The Environment Agency map (see Figure 2-1) suggest a possibility of isolated areas of Flood Zone 2 and Flood Zone 3 associated with the Langwith Drain in the northern part of the development site. The balance of the site, including the airfield, is suggested to be Flood Zone 1. The Environment Agency flood risk mapping does not indicate any flood risk associated with the land at and surrounding the Elvington airfield.

- 2.2.2** Previous consultations with the Environment Agency, City of York Council and the Ouse and Derwent IDB undertaken during 2013/2014 with regard to the flood risk predictions on the Tilmire and Langwith Drains, confirmed that there are no detailed flood levels, associated with fluvial flood risk from these drains). It was confirmed that the flood risk mapping for this area was produced using a generalised national scale modelling approach to provide a strategic indication of the likely flood risk, but does not include local detail (that will affect the accuracy of local flood risk map). It is generally accepted by these parties that the Environment Agency flood mapping does not fully and accurately represent the flood risk associated with the Tilmire and Langwith Drains, which are indicated to be the source of local flood risk in this area, which are shown in the maps to affect the allocation site.
- 2.2.3** Therefore, more detailed site specific hydraulic modelling was commissioned by Sandby using detailed topographical information and surveyed watercourse channel data to more accurately establish the probability of flooding and define the flood zones. The modelling was in accordance with Flood Estimation guidelines published by the Environment Agency to provide a more detailed modelled prediction of the behaviour of these two watercourses during a range of extreme storms, equivalent to the determination category thresholds as set out within the Environment Agency Flood Zones (See table 2.1)
- 2.2.4** A comparison of the Environment Agency flood maps and the more detailed prediction from the site specific hydraulic modelling is given in Figure 2-2 below.

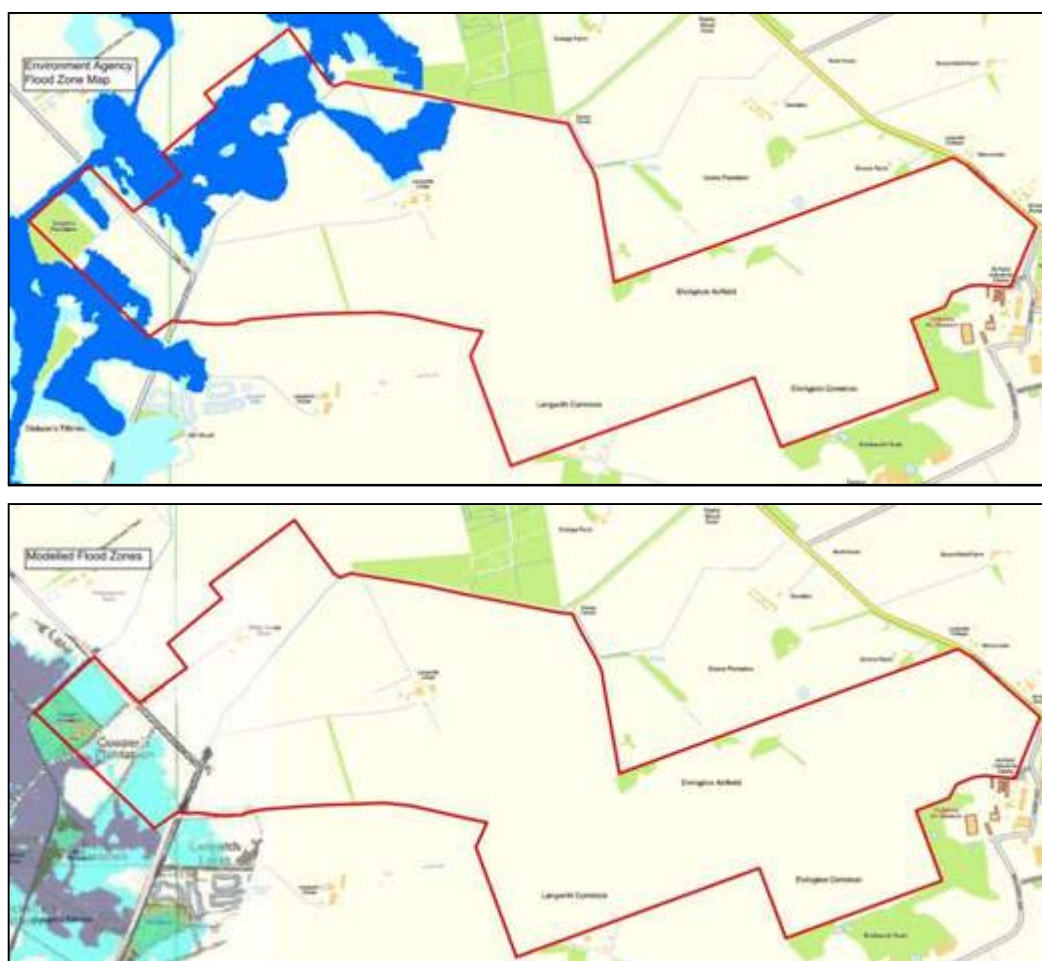


Figure 2-2 Comparison of Environment Agency and modelled flood zones superimposed on the proposed site boundary

- 2.2.5 It is evident that the addition of local detailed site information has enabled a more accurate prediction of the flood risk. This indicates that the topography of the site is of key importance in the determination of the location and extents of flooding. The modelling demonstrates that the northern part of the development site, which is elevated above the Tilmire, is not at significant risk of flooding and could be more accurately categorised using the Environment Agency flood zoning criteria as Flood Zone 1, with a low annual probability of fluvial flooding.
- 2.2.6 There is a small area of the development site boundary in the north-western corner, which is indicated to still retain a higher degree of flood risk associated with this portion of land. The elevated flood risk in this area has been accounted for in the development of the masterplan for the site, as illustrated in the drawing of the potential form (concept only) of the future development in Appendix A.
- 2.2.7 The results from the hydraulic modelling undertaken were discussed with the Environment Agency and they confirmed that they would have no objections to development from a flood risk perspective, given that the commentary on the built development for the emerging masterplans indicated no such built development areas would be in any high risk flood zones.
- 2.2.8 The Boxing Day 2015 and January 2016 flood were also used to compare the predictions of the modelling with what happened on site. A site visit and inspection of the Tilmire and Langwith Drains was undertaken in early January 2016 at a time when the River Ouse was still flowing

outside of its banks and flood levels remained high. The following points of significance were recorded:

- Water levels within the drains were observed to be several feet below bank top level.
- Evidence of flooding 'flotsam' (such as debris, bits of timber etc.) were observed, in the majority, to be found below bank top level, with the exception being at isolated, relatively low lying parts of the Tilmire where some overtopping of the Tilmire Drain (e.g. in the low lying central area of the Tilmire and at the south west corner) but all remote from the proposed development site.
- Standing water was evident in isolated locations around the site, but this was assessed as being caused by heavy and prolonged rainfall onto already saturated ground and inadequate drainage in areas where ponding might be expected to occur.

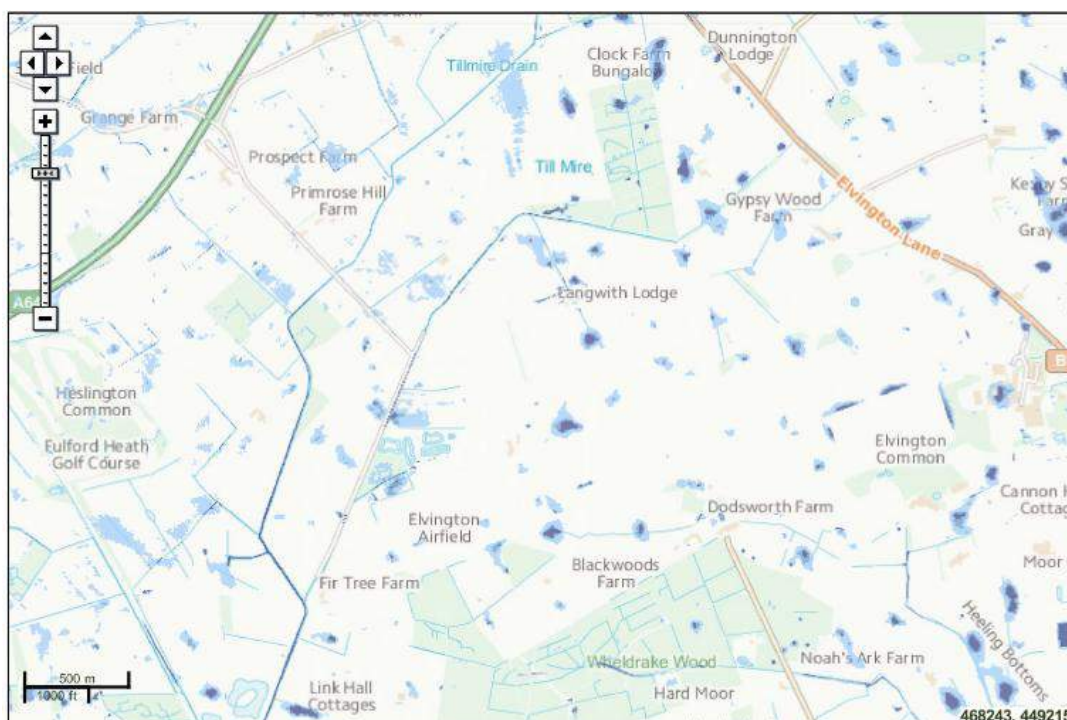
2.2.9 As such there was no evidence of any flooding outside of the drain in the proposed development site, which would appear to substantiate the predicted modelled flood risk scenarios that illustrate no significant risk of flooding.

2.3 SURFACE WATER FLOOD RISK

2.3.1 This is an important consideration as areas of significant surface water accumulation or overland flow routes of surface water being conveyed from one area to another can impose a significant flood risk to development. The Environment Agency produces surface water flood risk maps, also at a strategic level in a similar manner to their fluvial flood risk mapping. As such the mapping indicating the risk of surface water flooding is also subjective relative to the degree of local information included in the modelling.

2.3.2 The Environment Agency map (Figure 2.3) indicate local pockets of designated surface water flood risk which is likely to be related to local topographic depressions and will not present a significant risk for any development.

2.3.3 The development of a surface water management plan, as part of a detailed site specific Flood Risk Assessment and Drainage Strategy, will ensure that all development plots will be resistant to and protected from surface water flows and ensure a sustainable strategy for the management of surface water flows within the development in line with all relevant standards and best practise.



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Figure 2-3 Environment Agency flood risk for surface water flooding

2.4 OTHER FLOOD RISK

2.4.1 Other potential sources of flood risk include:-

- Flooding from reservoirs – this risk is also identified on Environment Agency mapping which identifies anticipated flow routes should a catastrophic failure result in water being released from a reservoir. There is no identified risk from reservoir flooding to the development site.
- Sewer flooding – there is no significant sewerage in the northern part of the site and therefore no associated risk of flooding. The airfield part of the site has an effective and efficient system with no recorded instances of flooding. This system deals only with surface water on the site because of its once strategic importance. Any development would establish its own drainage system which would likely make the existing system largely redundant. However, there are no conveyance sewers through or close to the site (i.e. from a significant upstream catchment) and therefore no significant risk of flooding to the site due to blockage or failure of sewers.
- Although definitive information related to groundwater flooding is not available for the site, it is deemed likely that given the wide scale agricultural use of the surrounding land and the presence of systems of local watercourses and drains, that the risk of groundwater flooding emerging in the local area is unlikely.
- Access to the proposed development includes a link road to the A64 crossing both the Langwith and Tilmire drains. This will pass through flood zone 2 and flood zone 3, i.e. with a medium to high probability of annual flooding. The road level will be set above the flood level to ensure safe access and egress and compensatory flood storage will be provided to offset any flood storage lost by the construction of the road to ensure no increased flood risk to others.

3 SURFACE WATER MANAGEMENT

3.1 EXISTING SURFACE WATER DRAINAGE PROVISION

- 3.1.1 The northern and central part of the proposed development site comprises predominantly agricultural land (greenfield land). This is drained of surface water by a series of riparian drains and ditches which convey surface water to the IDB controlled drainage network including the Langwith Drain (see section 2.1.2 above).
- 3.1.2 Site visits have shown these to be regularly maintained and effective in operation (albeit there are some isolated depressed areas that are prone to ponding in prolonged wet weather).
- 3.1.3 The southern part of the proposed allocation site is an airfield with concrete taxi- and run-ways and areas of hard-standing for plane and vehicle standing, roadways and former (and one existing) buildings that is considered brownfield land. This was originally an RAF base used in WWII but was subsequently redeveloped by the US Air force with a longer runway and remodelled layout. The hard-standing areas have an existing and highly effective below ground drainage system (comprising surface drainage gullies, large diameter concrete encased drainage pipes and settling/oil separator ponds). The remainder of the airfield is grassed but also includes an effective drainage network of field drains comprising perforated pipes within gravel trenches: these discharge via silt traps into the below ground drainage system.
- 3.1.4 A site visit and inspection showed this drainage system to be in good condition and it is likely to have the capacity to rapidly clear stormwater from the runway and discharge it from the drainage system. We understand the grassed areas typically have highly permeable near surface soils overlying impermeable cohesive soils (clay). This results in a quick and effective discharge of surface water run-off from these grassed areas into the drainage system.
- 3.1.5 Detailed drainage plans are available for the airfield, which show that, with the exception of a small area of the airfield that drains to the south, all other drainage connects into the main Langwith drain through a series of smaller tributary drains (the Langwith House Drain and the Gypsy Wood Drain).
- 3.1.6 The exception is the southern edge of a large concrete hard-standing area at the southern side of the airfield which drains to the Heeling Dyke (which in turn drains to the River Derwent).

3.2 PROPOSED SURFACE WATER DRAINAGE PROVISION

- 3.2.1 Notwithstanding that part of the site is hard-surfaced and positively drained, proposed development of the site will result in a potentially significant increase in generated surface water run-off.
- 3.2.2 Important to the successful development of the site will be the incorporation of a surface water management system that manages the run-off and restricts discharges into the surrounding drainage network to sustainable levels. These discharge restrictions will primarily be set by the Ouse and Derwent IDB who have primary responsibility for the local area drainage network, i.e. prior to discharge to the Environment Agency controlled main Rivers (the Rivers' Ouse and Derwent). However, the City of York, who have responsibility for 'place making' will have important input into the development and the surface water management system.
- 3.2.3 Previous and more recent (August 2016) consultations with City of York and the Ouse and Derwent IDB over their requirements for the scheme identified the following key issues:-

- The proposed development should incorporate SuDS;
 - There are established and accepted principles (e.g. the CIRIA SuDS manual), but the scale and nature of the development will afford the opportunity to develop a robust and sustainable system, which will incorporate surface water attenuation storage to retain surface water run-off 'at-source' on site to mimic the performance of natural catchments and restrict discharges to the surrounding watercourses to acceptable levels, without many of the constraints of smaller developments with greater competition for land needs. The system will be able to promote bio-diversity through creation and enhancement of green spaces and corridors and provide high quality amenity through a holistic design of the development.

Permeability testing would establish any opportunity for infiltration of surface water but typical characteristics (e.g. the network of drainage ditches and watercourses in the area, high water table and low permeability soils) suggest only limited opportunity for disposal of surface water by infiltration.

The part of the development site on the former airfield is more linear in plan, and allows the formation of principal swales and connected online detention basins to be located in the central and northern parts of the former airfield running in an east to west direction. These will be linked to the developed areas through piped or transition swale connections, which will be able to discharge into the principal flow control systems, to achieve both elements of local 'at source' control and overall run-off control.

- Follow the preferential hierarchy of Building Regulations (run-off to suitable watercourses);
 - The proposed development site benefits from access to the existing and well maintained surrounding drainage network of the Ouse and Derwent IDB controlled ditches.
- That surface water discharge into the surrounding drainage system should be restricted to sustainable rates;
 - There is the opportunity to provide within the development site the infrastructure to provide natural management of run-off and limit discharges to sustainable levels: Discharge rates will reflect existing standards to promote sustainable development (and will be subject to detailed analysis and negotiation with the IDB in due course) that are:
 - 1.4 litres/second/hectare from existing 'greenfield' land.
 - 98 litres/second/hectare (140 l/s/ha less 30%) from existing 'brownfield' land.

- 3.2.4 The benefits of the surface water management system on the proposed development site are not restricted to the site itself but through sensitive, high quality design and innovative design can afford substantial benefits and enhancements to the surrounding area. The existing run-off from the site will, in time of heavy and prolonged rainfall, significantly exceed 'greenfield' rates because of waterlogged and saturated ground. The introduction of a managed system will be robust against these events, reducing run-off at these critical times when watercourses are at or above capacity and reduce the contribution of these areas to flooding which currently affects downstream areas.
- 3.2.5 There is also the opportunity as part of the development (albeit outside the proposed development red-line boundary) to provide ecological enhancement of parts of the Tilmire including a buffer to the SSSI and potentially improved habitat on what is currently arable farmland. This would include (with the agreement and co-operation of the IDB, etc.) soft engineering to allow periodic controlled flooding of designated areas. This is a natural, seasonal phenomenon but there is the potential to provide through the development surface water management system a more controlled and reliable water source (e.g. reducing rainfall peaks) as well as easing peak flows through the Tilmire thereby reducing downstream flood risk.
- 3.2.6 Successful integration of the scheme will involve detail discussions with the Ouse and Derwent IDB: There is opportunity to review the suitability of the receiving ditches and ensure that flow is introduced to the ditches in an acceptable and sustainable way to match the IDB's aims for their assets.

3.3 SURFACE WATER MANAGEMENT SYSTEM DESIGN

- 3.3.1 The surface water management system will be designed in accordance with current guidelines and good practice with an aspiration for exemplar design. The key design parameters include:
- Design of the system to accommodate surface water generated by the critical 1 in 100 year storm with an allowance for climate change (incorporating the latest Environment Agency guidance which currently stands at between 20% and 40% increase in rainfall intensities) without flooding to development or uncontrolled discharge off the development site.
 - Design the development to be robust against exceedance events (i.e. rare events in excess of the 1 in 100 year storm, by incorporating suitable overland flow routes for surface water channelled away from sensitive development.

3.3.2 Outline preliminary design using WinDes Microdrainage has identified that approximately 10% of the development site is to be earmarked for a SuDS.

3.4 SURFACE WATER MANAGEMENT BENEFIT TO SURROUNDING AREAS

3.4.1 As part of the wider principles associated with the allocation site, there are parcels of land to the north-west, which are proposed for habitat enhancement areas to improve and expand the habitat associated with the Heslington-Tilmire SSSI located further to the west.

3.4.2 There is also the opportunity as part of the development (albeit outside the proposed development red-line boundary) to provide ecological enhancement of parts of the Tilmire including a buffer to the SSSI and potentially improved habitat on what is currently arable farmland. This would include (with the agreement and cooperation of the IDB, etc.) soft engineering to allow periodic controlled flooding of designated areas. Currently such flooding is a natural, seasonal phenomenon but there is the potential to provide through the development surface water management system a method for a more controlled and frequent water source (e.g. reducing heavy intermittent inundations) as well as easing peak flows through the Tilmire, thereby further reducing downstream flood risk.

4 CONCLUSIONS

4.1 FLOOD RISK

- 4.1.1 The development site is located in a potentially sensitive location with respect to fluvial flood risk. Historically the City of York and Elvington have suffered significant and damaging fluvial flooding, the most recently on Boxing Day 2015. Therefore due consideration of flood risk issues is an important consideration in the development of this site.
- 4.1.2 The Environment Agency map show most of the proposed development site in Flood Zone 1 (which has a low annual probability of fluvial flooding) but suggests a possibility of isolated areas of Flood Zone 2 and Flood Zone 3 associated with the Langwith Drain in the northern part of development site.
- 4.1.3 Consultation with the Environment Agency, City of York Council and the Ouse and Derwent IDB, confirmed that the Environment Agency flood mapping does not fully and accurately represent the flood risk for this site and therefore, more detailed site specific hydraulic modelling was commissioned by Sandby using detailed topographical information and surveyed watercourse channel data to more accurately establish the probability of flooding and define the flood zones.
- 4.1.4 The modelling demonstrates that, contrary to the Environment Agency flood maps, the northern part of the development site is not at significant risk of flooding and could be more accurately categorised using the Environment Agency flood zoning criteria as Flood Zone 1, with a low annual probability of fluvial flooding.
- 4.1.5 The results from the hydraulic modelling undertaken were discussed with the Environment Agency and they confirmed that they would have no objections to development from a flood risk perspective, given that the commentary on the built development for the emerging masterplans indicated no such built development areas would be in any high risk flood zones.
- 4.1.6 The modelling predictions have been tested against the Boxing Day 2015 and January 2016 floods which also showed no signs of flooding on the northern part of the proposed development site.
- 4.1.7 Access to the proposed development includes a link road to the A64 crossing both the Langwith and Tilmire drains. This will pass through areas of land in flood zone 2 and flood zone 3, i.e. with a medium to high probability of annual flooding. The road level will be set above the flood level to ensure safe access and egress and compensatory flood storage will be provided to offset any flood storage lost by the construction of the road to ensure no increased flood risk to others.
- 4.1.8 The site is therefore deemed entirely appropriate for development in respect to flood risk.

4.2 SURFACE WATER MANAGEMENT

- 4.2.1 The proposed development of the site will result in a potentially significant increase in generated surface water run-off and therefore the development of the site will incorporate a surface water management system that manages the run-off and restricts discharges into the surrounding drainage network to sustainable levels. This is in accordance with criteria agreed with the Ouse and Derwent IDB who have primary responsibility for the local area drainage network.
- 4.2.2 The proposed development will incorporate SuDS: the scale and nature of the development will

afford the opportunity to develop a robust and sustainable system which will incorporate surface water attenuation storage to retain surface water run-off 'at-source' on site. This will mimic the performance of natural catchments and restrict discharges to the surrounding watercourses to acceptable levels, without many of the constraints of smaller developments with greater competition for land needs. The system will be able to promote bio-diversity through creation and enhancement of green spaces and corridors and provide high quality amenity through a holistic design of the development.

4.2.3 The benefits of the surface water management system are not restricted to the site itself but through sensitive, high quality and innovative design can afford substantial benefits and enhancements to the surrounding area:

- Run-off from the site will be significantly reduced in time of heavy and prolonged rainfall which currently will exceed 'greenfield' rates because of waterlogged and saturated ground, reducing load in the drainage system and reducing downstream flood risk.
- There is also the opportunity as part of the development (albeit outside the proposed development red-line boundary) to provide ecological enhancement of parts of the Tilmire including a buffer to the SSSI and potentially improved habitat on what is currently arable farmland. This would include (with the agreement and cooperation of the IDB, etc.) soft engineering to allow periodic controlled flooding of designated areas. Currently such flooding is a natural, seasonal phenomenon but there is the potential to provide through the development surface water management system a method for a more controlled and frequent water source (e.g. reducing heavy intermittent inundations) as well as easing peak flows through the Tilmire, thereby further reducing downstream flood risk.
- There is opportunity, working with the Ouse and Derwent IDB to improve the discharges to and performance of parts of their network aligned with the IDB's aims.

4.2.4 The key design parameters for the surface water management system include:

- Design of the system to accommodate surface water generated by the critical 1 in 100 year storm with an allowance for climate change (incorporating the latest Environment Agency guidance which currently stands at between 20% and 40% increase in rainfall intensities) without flooding to development or uncontrolled discharge off the development site.
- Design the development to be robust against exceedance events (i.e. rare events in excess of the 1 in 100 year storm, by incorporating suitable overland flow routes for surface water channelled away from sensitive development.

4.2.5 Outline preliminary design using WinDes Microdrainage has identified that approximately 10% of the site should be earmarked for a sustainable urban drainage system. This has been incorporated in to the masterplan.

4.2.6 With respect to the information provided above, it is therefore considered that methods adopted deem the development entirely appropriate with regard to surface water management control.

Appendix A

**POTENTIAL FORM (CONCEPT ONLY) OF FUTURE DEVELOPMENT
OF THE SITE**

APPENDIX A-1

**DRAWING 23910.9610 – CONCEPT MASTERPLAN –
REV -).**



APPENDIX 12

UTILITIES AND ENERGY TECHNICAL ASSESSMENT

REPORT 70011808-RPT-02

LANGWITH GARDEN VILLAGE

UTILITIES & ENERGY TECHNICAL APPRAISAL

SEPTEMBER 2016

LANGWITH GARDEN VILLAGE UTILITIES & ENERGY TECHNICAL APPRAISAL

Sandby/Oakgate/Caddick Groups

Revision 1
Project no: 70011808
Date: September 2016

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APPENDICES

A P P E N D I X A POTENTIAL FORM (CONCEPT ONLY) OF FUTURE DEVELOPMENT OF THE SITE

APPENDIX A-1 DRAWING 23910.9610 – CONCEPT MASTERPLAN – REV -).

EXECUTIVE SUMMARY

WSP Parsons Brinckerhoff has been appointed by the Sandby/Oakgate/Caddick Groups to provide a technical appraisal of the utility and energy particulars associated with a proposed development known as Langwith Garden Village. It is submitted in support of the site's allocation for a new sustainable settlement within the City of York Council's emerging allocation within its Local Plan (preferred sites consultation).

The development site has the benefit of a wide range of existing utility service supplies that supply areas of the site, cross through the site or are in close proximity to the site.

The presence of such services should enable the connection of the development into the existing utility network infrastructure in a relatively straightforward manner, and enable the parallel operation of initial infrastructure connections with the larger and longer process of network reinforcement and improvement within these networks that will be required for the full scale of the development.

Electric

There are a large number of existing HV cables, principally overhead cables that run through the development site to connect to other networks and to supply local farms, which provide the opportunity to make initial connections for a limited allocation of units into this existing supply.

Where identified cables are to be retained, they will be required to be diverted into underground cables along the existing or similar routes to suit the development.

There will be a requirement to upgrade the overall supply of electricity to the site, which is expected to be completed in parallel to the process of development upon the allocation site.

Gas

There are no gas mains on the development site, although the site is in close proximity to the medium pressure gas main in Elvington Lane, the development should be able to connect to this gas main to supply an initial allocation of development units.

There will be a requirement to provide site reinforcement works in relation to the full scale of the development and it is considered that this work can be completed in parallel to the development of the site.

Telecommunications

There is BT infrastructure located within and surrounding the site, which is expected to be utilised for initial connections for an allocated number of development units.

Further reinforcement and development wide networks will need to be established onsite, although this is expected to be completed in parallel to the process of development upon the allocation site.

There will be a requirement to divert or create easements for a small of cables that are required to be retained, although the connectivity of the cables recorded in the airfield area of the site are recommended to be further investigated to ascertain any future need prior to abandonment of these supplies.

There are existing mobile phone mast adjacent to the development site that will provide some coverage for early allocation of development units, although future masts will be needed to provide both further coverage and upgrades to the most modern versions of mobile signal available (e.g. 5G).

Potable Water

There are a small number of existing private supplies serving the farms to the north of the allocation site and a further private main on the airfield part of the site. It is proposed that the private water main on the airfield would be suitable to serve an initial allocation of housing units.

YW have previously indicated that they are able to supply a development of this magnitude in this area and discussions with YW will be required to ascertain the most suitable manner of getting potable water to the allocation site.

Drainage

There is no provision of public foul drainage within the development, although it is expected that there will be some public sewers located adjacent to the south east of the site.

A new provision to receive foul wastewater from the site will need to be made with Yorkshire Water to supply the site. It is expected that this will include a requirement for a pumping station and rising main to take the flow to Naburn WwTW.

The discharge of wastewater from a small allocation of development may be possible in either a temporary or permanent capacity to the expected public sewers near the site, which will need to be agreed with YW.

The provision of surface water drainage is discussed in the WSP report ' Report 70011808-rpt-001 – Langwith- Flood Risk and surface water management Technical appraisal.

District Heat Network

The allocation site could be supplied by a central energy centre providing the heat source for all heating and hot water requirements. The primary heating plant in such an energy centre would comprise gas fired boilers, combined heat and power unit (CHP), thermal stores and primary circulation pumps.

Primary pumps located in the energy centre would distribute heating water via a variable volume district heating circuit. Large diameter primary heating pipework would distribute underground within the public realm to serve secondary plant areas located in each school, retail and residential area.

Development Summary

There exists within the allocation site viable means to provide initial connections into the surrounding infrastructure to allow an allocated number of units to be developed on the site, during the process of upgrading and reinforcement of the wider supply network in order to serve the final development magnitude.

The location of the site near major utility corridors means there is a viable means of providing services to this development, with practical and achievable options for creating such connections

Service providers contacted have indicated the work which they need to complete to provide reinforcement and upgrades to their networks surrounding the allocation site, which should enable the future delivery of required utility services for the development of 5000 units with the associated commercial, community and education provisions that indicate that the allocation site is a viable, achievable proposal.

1 INTRODUCTION

1.1 APPOINTMENT

WSP Parsons Brinckerhoff has been appointed by the Sandby/Oakgate/Caddick Groups to provide a technical appraisal of the utility and energy particulars associated with a proposed development known as Langwith Garden Village. It is submitted in support of the sites allocation for a new sustainable settlement within the City of York Councils' emerging allocation within its Local Plan (preferred sites consultation).

1.2 SCOPE

1.2.1 This report outlines the findings of the appraisal. It describes the existing services located within and adjacent to the site and gives a high level appraisal of how this infrastructure could affect the proposed development. It also identifies potential constraints and how they can be addressed to successfully deliver development on the site.

1.2.2 Utility information that is referenced in this report has been obtained from a number of sources including: -

- MEC Ltd Report "Proposed Mixed Use Development, Whinthorpe, York, Yorkshire – Utilities Report"; November 2015; Report Ref: 21617/11-15/4036.
- The owners of Elvington Airfield
- Information obtained during a visit to the site
- Utility information obtained by Centara in relation to the development site

1.2.3 We have also considered Combined Heat and Power (CHP) for energy supply to the proposed development.

1.3 SITE DESCRIPTION

1.3.1 The proposed development site is located on the outskirts of York (south of the A64) in close proximity to the existing settlement of Elvington. It covers a large area of land from Elvington Airfield running north-west towards the Tilmire Drain. The proposed development will include an access off Elvington Lane (on the site's eastern boundary) with realignment of Elvington Lane to provide an improved junction with Hull Road, and a new link road north across the Tilmire onto a new road junction with the A64.

1.3.2 A plan indicating the potential form (concept only) of the future development of the site is included in Appendix A (Drawing 23910.9610 – Concept Masterplan – Rev -).

1.3.3 The future development of the allocation site would provide 5000 residential units as well as associated commercial, community and education provisions within the boundary of the site.

1.3.4 There is potential for further land to become available adjacent to the site (Handley Land), which could provide space for some additional 500 development units, although this additional area of land does not form part of this proposed allocation.

2 EXISTING UTILITIES

2.1.1 The following utilities exist on or in close proximity to the development site:-

2.2 ELECTRICITY

2.2.1 Existing electricity infrastructure includes a number of 33kv and 11kv cables in the area including:

- A bank of 6 No. 33kv and 1 No. 11kv underground cables are located in the eastern carriageway of Elvington Lane running in a north south direction. These cables turn eastward toward the development site near gypsy wood farm, travelling towards the south-eastern corner of gypsy wood. At this location the cables split, with cables travelling in a south, west and north-west direction in both above ground and underground forms.
- A bank of 3 No. 33kv overhead cables runs in a north-west direction from the corner of gypsy wood along the southern boundary of the wood (to the north of Langwith Drain) and at the end of the wood turn in a northern direction towards Grimston Grange.
- To the south of the 33kv overhead line (and still to the north of Langwith drain) a bank of 33kv underground cables are shown to run parallel to the line of the overhead line to the south west corner of gypsy wood. These underground cables continue to run parallel to the Langwith Drain to the west towards White House Farm, and at the northern boundary of the field to the north east of the farm, they connect to an overhead 33kv line. This overhead line then crosses the development site in a north-west direction towards the Tilmire Drain along field boundaries.
- 2 No. 11kv cables run underground in a south direction from the corner of gypsy wood towards Elvington airfield. One of these is shown to be a redundant main and another main is indicated to have the capacity to carry 33kv. Information from the owner of Elvington airfield indicated electrical services enters the airfield at a point where the underground cables would enter, and it is assumed that these are linked. The underground cables are shown on airfield records to cross the airfield from this point to the southern edge of the taxi-lane and then loop around to the south around the aircraft parking/fuelling area to the east.
- An 11kv overhead cable runs in a western direction from the corner of gypsy wood towards Langwith Lodge, and it is assumed to feed the lodge. This overhead cable crosses the development site.
- A cable of unknown size (assumed to be either 11kv or 33kv) is shown to run in a north west to south east direction to the immediate north of White horse farm directly across the development site. This overhead cable is believed to connect through the development site to Langwith lodge to the south east and away from the development site in a northwest direction towards the A64.
- A further overhead 11kv spurs from this unknown overhead line at White Horse Farm and runs to the south to connect to Langwith House, directly across the development site.
- To the north of Elvington Airfield there is indicated to be a disconnected 11kv spur from Elvington Lane running to the west parallel to the airfield.

- 2.2.2 To the north of the planned junction on the A64 that is intended to link the development site to the A64 there are 132kV overhead lines located in close proximity. The design of the junction will be required to take cognisance of any constraints inferred by the cables and work will have to be carried out in accordance with safety clearance information for such services as advised in HSE published guidance (GS6 - Avoiding danger from overhead power lines).

2.3 GAS

- 2.3.1 There are no gas mains located in the northern area of the development site.
- 2.3.2 There is a 225mm PE medium pressure main located in Elvington Lane, which runs in a north to south direction past the development site's eastern boundary.
- 2.3.3 A 90mm PE medium pressure spur from the 225mm main in Elvington Lane, runs from the lane in a south westerly direction along the entrance road to the air museum and through this land into the Airfield Business Park area close to the south eastern boundary of the development site.

2.4 TELECOMMUNICATIONS

- 2.4.1 Within the development site boundary there are both underground and overhead BT services crossing the site, including:
- An underground BT cable that runs in a north to south direction along Long Lane, which includes an overhead spur to White horse farm and an underground spur to Tilmire Farm that connect through the development site.
 - The BT connection from Long Lane links to an underground cable that connects in a southwards direction along Langwith Stray (road) before connecting through to Langwith House to the north of Elvington Airfield, and then continuing underground in a southwards direction from the property directly across the Airfield.
 - There is a further underground BT connection through the development from the east that runs in a west to east direction along Langwith Stray (Road/Track) from Elvington Lane to connect to Langwith Lodge
 - There are extensive underground BT cables located within the Elvington Airfield area of the development site, with a main cable running in a west to east direction that is located in the Taxi-way part of the airfield and extends the full length of the airfield. Additional underground cables/spurs connect from this main line to the airfield control tower, across the aircraft standing/parking area and connecting out to the north east beyond the development site through overhead cables to a further connection onto Elvington Lane.
 - There is an underground BT service running in Elvington Lane, with overhead connections to local properties from this cable.
- 2.4.2 There are currently two mobile phone masts in and within close proximity to the site, which are :
- Near to the Elvington Airfield control tower in the southern part of the development site that is controlled by 'O2' (company). Information on this mast states that it transmits at 900 MHz, which indicates that the mast is capable of providing 2G (generation) and 3G coverage only.
 - Another mast is located near to Primrose Hill Farm to the north of the development site, operated by 'Three' (company). Information on this mast held by OFCOM state that it transmits at a frequency of 2100 MHz that indicates that it is capable of providing only 3G coverage.

2.4.3 There are two further masts present to the south east of the site at Elvington Industrial Estate, which have the following supplies listed as being provided:

- 'Three' (company) mast, transmitting at a frequency of 2100 MHz, indicating the ability to provide 3G coverage only
- 'EE' (Orange/ T Mobile) mast, transmitting at a frequency of 1800MHz, indicating the ability to provide 2G and 4G

2.4.4 There are no Virgin Media cables indicated to be located in the majority of the development site, although further records have been requested for the southeast of the site as this was not covered in the original search. Given the historic nature of this part of the site it is not expected that there will be any services located in the site, although cables and services may exist outside the site.

2.5 POTABLE WATER SUPPLY

2.5.1 There are no public water mains indicated to be present on the majority of the development site, although further records have been requested for the southeast of the site as this was not covered in the original search.

2.5.2 There are private water mains indicated on Yorkshire Water (YW) plans that supply the local farms in the north of the development site. The private mains indicated on YW plans may not be the full extent of all water mains (these are not the statutory ownership and responsibility of YW), as it is likely that all local properties would be connected to similar mains if such a provision was available. The private mains indicated on YW plans are:

- A private main running in a north south location in the eastern verge of Long Lane, that is shown to be supplied by a public water main to the north of the A64, and which runs the length of Long Lane through the development site to stop just prior to Langwith Stray (Road).
- A further private spur is indicated to connect off the main in Long Lane to connect in a westward direction across fields to the west towards Tilmire Farm, from a point on Long Lane south of the access road to White Horse Farm.

2.5.3 Information provided by the owners of Elvington airfield indicate that there is a water main (thought to be 150mm) that runs across the development site on Elvington airfield in an west to east direction, connecting from a point on Elvington Lane opposite the main runway of the airfield, and running beneath the airfield towards the Taxi-way towards the airfield control tower. The historic maps provided of the Elvington airfield indicate the historic presence of a crash fire station at this location and it is likely that the water main would have served this site.

2.6 DRAINAGE

2.6.1 There are no public sewers indicated in YW's responses for the majority of the site, although further records have been requested from YW for the southeast of the site as this was not covered in the original search.

2.6.2 The Elvington airfield is served by an extensive surface water drainage system following the redevelopment of the airfield by the US Airforce with a longer runway and remodelled layout. The hard-standing areas have an existing and highly effective below ground drainage system (comprising surface drainage gullies, large diameter concrete encased drainage pipes and

settling/oil separator ponds). The remainder of the airfield is grassed but also includes an effective drainage network of field drains comprising perforated pipes within gravel trenches: these discharge via silt traps into the below ground drainage system.

- 2.6.3 Detailed drainage plans are available for the airfield, which show that, with the exception of a small area of the airfield that drains to the south, all other drainage connects into the main Langwith drain through a series of smaller tributary drains (the Langwith House Drain and the Gypsy Wood Drain).
- 2.6.4 The exception is the southern edge of a large concrete hard-standing area at the southern side of the airfield which drains to the Heeling Dyke (which in turn drains to the River Derwent).
- 2.6.5 A search of the Environment Agency permits register did not show any of the properties within the northern agricultural land of the site and beyond to have any records of septic tank consents. However it is likely that all these properties are served by septic tanks or similar systems.
- 2.6.6 A foul rising main is shown on YW records to run parallel to the A64 along its southern boundary in an east to west direction.
- 2.6.7 All the development site drains into watercourses under the control of the Ouse and Derwent Internal Drainage Board (IDB). With the exception of the extensive drainage system on the Elvington airfield discussed above, the remainder of the land in the development site is understood to drain surface water rainfall through either field drains (land drains) or through ground infiltration/run-off into the extensive field ditches and drains that connect into the IDB controlled drains.
- 2.6.8 The IDB controlled Langwith Drain runs around the north – eastern boundary of the agricultural land part of the development south of Gypsy Wood and through the development site in a north east to south west direction to the south of White Horse Farm.
- 2.6.9 The larger Tilmire drain is located immediately to the north of the development site, running in an east to west direction along the part of the north western boundary of the development site that runs beneath Long Lane to the west along the northern edge of Coopers Plantation (wood). The Tilmire Drain then drains to the south west, into which the Langwith Drain discharges, and then onto the south west through the village of Escrick to discharge into the River Ouse. The proposed development link road from the development site to a proposed new junction with the A64 will cross the Tilmire Drain.
- 2.6.10 Other minor IDB controlled drains are also located adjacent to the development, which are unlikely to be affected by the proposed construction of the development, but may be influenced by the change in the surface water management for the development site, which shall be designed with the IDB to meet their future strategies for the local drains.

2.7 KEROSENE

- 2.7.1 The concrete hard standing to the south of the runway within the Elvington airfield part of the development site was historically used for refuelling aircraft and there are a number of Kerosene fuel pipes that run beneath the concrete slab. It is understood that these pipes were previously supplied by fuel tanks south of the development site that have been reportedly now been removed. It is thought that these tanks were serviced by a Kerosene supply pipe running from an unknown southern location towards the airfield, but this is deemed to be redundant.

3 POTENTIAL DIVERSION REQUIREMENTS

3.1 PROPOSED DEVELOPMENT SITE

- 3.1.1 Existing services will have restrictions for working near and/or wayleaves associated with them, and where the services do not significantly restrict the development the construction work can proceed in a safe manner in accordance with utility operators' individual guidance for their assets.
- 3.1.2 Where existing services are adjudged to affect the ability to construct or operate the development site in their current location, such services will need to be diverted to a location where construction and development work can proceed.
- 3.1.3 Some services will be made redundant by the proposed construction, i.e. in locations where the building or location, which they previously served is to be removed as part of the proposed development. Furthermore some utility services may also be able to be incorporated or replaced by the services that will be constructed to supply the development site.
- 3.1.4 A review of the impact of the proposed development on individual utilities, and the recommended actions associated for each supply is discussed below.

3.2 AFFECTED ELECTRICITY SUPPLY

3.2.1 Electrical cable near Langwith Lodge

- 3.2.1.1 There is an 11kv overhead cable that connects Langwith lodge from the south eastern corner of gypsy wood, which also connects via an overhead cable (it is unclear if it is 11kv or 33kv) to the north-west from the lodge across the development site.
- 3.2.1.2 This will require 600m of 11kv overhead power line and a further 860m of 11/33kv overhead power to be diverted underground on its current line.
- 3.2.1.3 As this power line crosses through the middle of the development area, if the cable was re-laid underground on its current route then wayleaves and an easement would have to be agreed on this route, limiting development along this route. It is recommended that from the point at which the diverted route from the north-west of the Langwith Drain near White Horse Farm meets the Langwith Drain that the diversion be taken on a parallel route to the Langwith Drain around the northern part of the development site to avoid the development, a diversion distance of 1.46km which is equivalent to its current length.
- 3.2.1.4 An assessment with Northern Powergrid (the asset owner) will be made as to whether there are opportunities to rationalise the network in the area to remove these 11kv (or 11kv/33kv) cables, if a power supply to Langwith Lodge is no longer required because of the development.

3.2.2 Electrical cable to Langwith House

- 3.2.2.1 There is an 11kv overhead electrical supply to Langwith House, from the 11/33kv cable that runs through the development site at a point to the south east of White Horse Farm, running south through the development site to Langwith House.

3.2.2.2 This will require the diversion of 600m of overhead electrical cable to an underground cable, if laid on its current route.

3.2.3 An easement would apply on the route of the diverted cable, if the cable were to be diverted around the edge of the planned development site, this would increase the length of the diversion required to 980m. This route would follow the line of the Langwith Drain in a south western direction from the connection near White Horse Farm, before turning east along the southern boundary of the development, to connect back into the existing line of the 11kv cable to Langwith House.

3.2.4 Electrical cables near south western corner of Gypsy Wood

3.2.4.1 There are 3 No. underground 33kv cables located on the northern boundary of Langwith Drain, from Gypsy Wood towards White horse farm that are within the development boundary, this connects into an overhead cable at a point 250m north of White horse farm, and travel north through the development site.

3.2.4.2 It is expected that the 3 No underground 33kv cables will be left in-situ and the development adjusted to provide an easement for these cables.

3.2.4.3 The 3 No 33kv overhead cables will need to be diverted below ground, which will require 300m of cables to be laid if laid on their current route.

3.2.4.4 The 3 No 33kv overhead cables could be diverted on an alternative path around the northern boundary of the development site. This diversion route would be for 435m and would move the easement to the development edge, maximising development opportunities.

3.2.5 Electrical cables beneath Elvington Airfield

3.2.5.1 There are 2 No underground 11kv cables that run beneath the Elvington airfield in a north south direction, towards the aircraft standing/parking area from gypsy wood plantation, one of these cables is indicated as being redundant.

3.2.5.2 It is assumed that only one 11kv cable would need to be diverted, although the cables are underground and may not be required on completion of the works it is expected that these cables are retained and an easement width allowed for.

3.2.5.3 Further discussions will be held with Northern Powergrid and investigations into the connections for the live 11kv cable will be undertaken, to ascertain if the cable is still required. If found to be redundant, it will enable a greater degree of flexibility in the developable land.

3.3 **AFFECTED WATER SUPPLY**

3.3.1 Private water supply in Long Lane

3.3.1.1 There is a private water supply located in the eastern verge of Long Lane that runs parallel to the highway in a north to south direction.

3.3.1.2 It is recommended that an easement is made for the private water supply along its current route.

3.3.1.3 An option to include potable water supplies to local farms that are currently fed off this private water main will be considered with YW to ascertain if they can connect into the development infrastructure, which would negate the need for the existing water main and any associated easement.

3.3.2 Private water supply to Tilmire Farm

- 3.3.2.1 There is a private water main connection from the water main in Long Lane to Tilmire farm that runs through the development land and the habitat enhancement area.
- 3.3.2.2 An easement can be made for this private water supply along its current route.
- 3.3.2.3 An option to include a potable water supply to Tilmire Farm will be considered with YW to ascertain if the farm can connect into the development infrastructure, which would negate the need for the existing water main and any associated easement.

3.3.3 Private water supply in Elvington airfield

- 3.3.3.1 There is a private water main that runs in a western direction from Elvington Lane toward the airfield control tower.
- 3.3.3.2 It is envisioned that this connection will no longer be required upon completion of the development of the airfield and should be considered for abandonment.
- 3.3.3.3 It is proposed that this water main connection is re-utilised to connect initial allocation of development units, whilst the remainder of the required water infrastructure is constructed by YW.

3.4 **AFFECTED BT SUPPLY**

3.4.1 BT cable in Long Lane

- 3.4.1.1 There is an underground BT cable that runs in a north to south location along Long Lane and then connects south west along Langwith Stray (road) to Langwith House.
- 3.4.1.2 It is presumed that an easement will be set for this existing route to enable continuing supply to Langwith House.
- 3.4.1.3 There may be an option to consider connecting Langwith house from the development BT supply network, should the easement for the existing route be problematic.

3.4.2 BT cable to White horse farm

- 3.4.2.1 There is an overhead BT cable connecting from Long Lane to White horse farm, this will be abandoned as the site of White horse farm forms part of the allocation site.

3.4.3 BT cable to Tilmire Farm

- 3.4.3.1 The underground BT cable spur from Long Lane to Tilmire Farm is located within the access track to Tilmire farm.
- 3.4.3.2 It is presumed that the access track will remain in its current location and therefore an easement for its existing route should be agreed.

3.4.4 BT cable to Langwith Lodge

3.4.4.1 The underground BT cable that connects Langwith lodge runs along the route of Langwith Stray (road) from the south eastern corner of gypsy wood

3.4.4.2 This connection will be made redundant by the development, and can be abandoned.

3.4.5 BT cables in Elvington airfield

3.4.5.1 There are a large number of underground BT cables in Elvington Airfield including one that runs across the full length of the airfield in a west to east direction, over 4.5km of cables.

3.4.5.2 It is not expected that the vast majority of these cables will be required to be retained, as they are likely historic cables relating to the former airfield site.

3.4.5.3 It is recommended that a full investigation into the connectivity of the BT supplies in the airfield is undertaken, and it is recommended that diversions on these connections or inclusion of these connections into the development infrastructure should be progressed to limit easements on the site.

3.5 **AFFECTED DRAINAGE SUPPLY**

3.5.1 The extensive drainage network on the airfield will no longer be required following the construction of the development.

3.5.2 It is recommended that all drainage systems are abandoned and hard standings removed from site and surface water managed during the construction phase.

3.6 **SUMMARY OF DIVERSION REQUIREMENTS**

3.6.1 The allocation site includes only a limited amount of services that cross the site, of which the HV electrical overhead supplies are the most significant.

3.6.2 A number of these services will become redundant as a result of the removal of their supply points to facilitate the development across the allocation site.

3.6.3 Diversions of services that are required to be retained on conclusion of the development will be diverted either through the allocation site along existing routes, or around the boundary of the site (principally the HV overhead electrical cables). Given the large amount of available space on the site, such work is not considered to be prohibitive when associated with this availability and the development of 5000 units.

3.6.4 Other services serving local farms and properties, including private water mains and BT supply cables can be retained on their current route without affecting development on the allocation site. Although the development of the allocation site offers opportunities to connect these previously remote properties to a larger grid of services associated with the development infrastructure.

4 UTILITY CONNECTIONS TO THE SITE

4.1 EXISTING SITUATION

- 4.1.1 An estimate has been made for the amount of supply that would be required from each utility provider to service the development. The information provided in this report, includes references to a wide range of existing services that are already within or in close proximity to the allocation site. The location of these services will enable the development to be connected into the local utility infrastructure networks in a simple and expedient manner. The overall wider utility networks will likely have to be strengthened over a period of time, to accommodate the fully realised development of 5,000 units (and potentially up to 5,500 units) and other uses proposed, but this is considered to be capable of being completed in a parallel manner to the construction within the development.

4.2 ELECTRICITY CONNECTIONS

- 4.2.1 There a wide range of existing high voltage cables that run around and through the site, as discussed in this report. The locations of these connections should enable the development to be connected into the existing electrical network, at locations around the site, which shall be determined through future discussions with the electrical network provider for the area (Northern Powergrid).
- 4.2.2 Initial estimates from Northern Powergrid for this size development estimated a requirement for a supply in the region of 20-40 Mva, although our internal review of the likely supply needs indicate that it will be more likely the lower end of this range. Northern Powergrid have indicated in their budget quote that a small allocation of development units could be served from existing infrastructure whilst future network upgrades are completed to balance the entirety of the development.
- 4.2.3 A review of the existing headroom within the primary substations on the Northern Powergrid indicates that there is current demand availability at both the Elvington and Heslington primary substations (the two closest to the site), which should allow the connection of a small allocation of units on the site to initially be fed from the existing electrical infrastructure, whilst planned network reinforcement is completed to balance the final development demand.
- 4.2.4 It is expected that for a development of this size that a dedicated primary substation will need to be constructed. The current route of the 33kv EHV feed to Elvington primary substation passes through the development site, so it is likely that any such primary-station can be located within the site on the line of these cables.
- 4.2.5 Should the supply for the primary substation need to go back to the Bulk Electrical supply point for York , this is only 5km away to the north.

4.3 GAS

- 4.3.1 The development site does not contain any existing gas infrastructure within the site, however there is a 225mm medium pressure gas main located immediately adjacent to the eastern boundary of the site in Elvington Lane.

- 4.3.2 It is expected that connections into this medium pressure gas main can be made to serve the site, which will require gas governors to be constructed to modulate the pressure to provide a low pressure gas supply to the development.
- 4.3.3 It is presumed that an initial allocation of development units will be able to be connected to the existing gas main through such governors, which will be undertaken in parallel to a programme of wider network improvements that will enable all the development to be adequately served which will match the pace of development of the site.

4.4 TELECOMMUNICATIONS

- 4.4.1 There are existing BT connections located in and around the site at numerous locations, which should enable initial connections to be made into this existing infrastructure to facilitate the development of an allocation of developable units.
- 4.4.2 BT Openreach offer to provide connections including fibre optic connections for free for developments of more than 100 houses. This allocation as a whole and individual phases of developable units is expected to exceed this threshold.
- 4.4.3 The timetable for the network provision of fibre optic to the site may take longer than the intended initial development of an allocated units, although it is expected that BT will be able to connect such properties into their existing network, whilst the fibre optic and other wider network upgrades are undertaken to match the scale and programme for the development of the full development.
- 4.4.4 There are existing mobile phone masts in the vicinity of the site, which could provide a mobile signal for users of the development. Should an initial allocation of houses be constructed on the development, the closest mobile phone masts are in the vicinity of the Elvington airfield part of the site, and this would be the most suitable for initial development.
- 4.4.5 Work will be undertaken with the mobile phone providers to establish full coverage of the site, and it may be possible to include new 5G (generation) coverage on the site, as well as lower generation supplied (2G, 3G and 4G).

4.5 POTABLE WATER SUPPLY

- 4.5.1 There are existing private water supplies located at both the eastern and northern end of the development site, and it is proposed that the private connection to the east of the site, be re-utilised for the purpose of serving the initial allocation of development units.
- 4.5.2 YW have indicated that a development of this magnitude in this area can be served from their existing water supply. The existing water tower serving York is located only 4km to the north of the site near York University and the Water Treatment Works (WOW) that provides potable water to York is located at Elvington approximately 1.5km to the east.
- 4.5.3 It is expected that the proposed development shall be initially connected to the existing potable network through the re-utilising of the private connection in Elvington airfield, with the future full potable supply to the site to be delivered from either the water tower at York University or direct from Elvington WTW, to be delivered to a timescale that matches the programme of development on the site.

4.6 FOUL SEWERAGE

There are no foul or combined sewers shown within the development, which was expected considering the lack of occupation and remote nature of the site. There are public foul sewers in the vicinity of the eastern portion of the site associated with the Yorkshire Air Museum and the Airfield business park, which drain to a local pumping station that discharges towards Elvington village. This route may be able to accept either the temporary or permanent connection of an initial allocation of development units, subject to discussions with YW .

- 4.6.1 The pumping station and rising main will likely have to be commissioned prior to the connection of any properties onsite, unless YW would allow a temporary or partial connection of a limited allocation of units to existing public sewers near the site. A connection to Naburn WwTW will be promoted with YW to enable the connection of the pumping station and rising main from the development. It has been assumed that dual mains would be laid, to offer the ability to manipulate the flow regime through the development lifespan to account for the gradual addition of development to the site, with the use of retention storage at the pumping station.
- 4.6.2 Using Sewers for adoption guidelines it is predicted that domestic flows from the site will be in the region of 20,000 m³ per day (based on a discharge of 4000l/unit/day for 5000 units). The commercial retail and school flows are predicted to be 921m³ per day (based on 1.35l/s/ha for 7.9ha of development). Therefore the peak design flow for the whole site is estimated as 242/s.
- 4.6.3 It is likely that future upgrading works would have to be undertaken at Naburn WwTW in response to the full scale of the intended development, but as the development will be included in the Local Plan then this will be accounted for in YW's analysis for future asset upgrading works, for which the next programme of works would be 2020-2025. It is expected that the YW upgrade programme at the WwTW would run in parallel to the development of the site and increasing of load to the WwTW.
- 4.6.4 Given the size and topography of the full development site, it is likely that a further internal pumping station and rising main will be needed within the development to limit the depth of sewers

4.7 DISTRICT HEATING NETWORK

- 4.7.1 The allocation site could be supplied by a central energy centre providing the heat source for all heating and hot water requirements. The primary heating plant in such an energy centre would comprise gas fired boilers, combined heat and power unit (CHP), thermal stores and primary circulation pumps.
- 4.7.2 Within this type development, a central district heating solution is considered to be the most appropriate on the basis of:
- Energy efficiency; primarily due to the incorporation of condensing boiler and CHP technology.
 - Reliable technology; modular plant design provides inherent resilience.
 - Future flexibility; alternative heat source, i.e. external community district heating, can be readily accommodated.
 - System diversity; with such a large scale development it is possible to exploit low diversity factors (10-15%) which reduce the size, and cost, of the central plant.

- Part load efficiency; modular arrangement of the central heating plant will enable efficient heating during the phased occupation of the site.

- 4.7.3 Primary pumps located in the energy centre would distribute heating water via a variable volume district heating circuit. Large diameter primary heating pipework would distribute underground within the public realm to serve secondary plant areas located in each school, retail and residential area.
- 4.7.4 Secondary plant areas will incorporate a series of suitably sized plate heat exchangers to hydraulically separate the district heating network from the building / sub building network. This will allow clear technical boundaries and demarcation of responsibilities in the event that an Energy Service Company (ESCO) is utilised to construct and operate the energy centre / district heat network.
- 4.7.5 The tertiary heating system (within the individual buildings, schools and residential houses / apartment blocks) would comprise connections from a Heat Interface Unit (HIU). A heat interface unit provides hydraulic separation between the secondary installation and the end user system within the building. Isolation valves and a thermal meter would be provided on the secondary side, along with strainer, flow balancing valves, etc.

5 CONCLUSIONS

5.1 SITE SUMMARY

5.1.1 Although the development site is located away from significant development area, it has the benefit of a wide range of existing utility service supplies that supply areas of the site, cross the site or are in close proximity to the site.

5.1.2 The presence of such services should enable the connection of the development into the existing utility network infrastructure in a relatively straightforward manner, and enable the parallel operation of initial infrastructure connections with the larger and longer process of network reinforcement and improvement within these networks that will be required for the fully realised final development.

5.2 ELECTRICITY

5.2.1 There is a large number of existing HV cables, principally overhead cables that run through the development site to connect to other networks and to supply local farms.

5.2.2 These networks will provide the opportunity to make initial connections for a limited allocation of units into this existing supply.

5.2.3 Several of these overhead high voltage cables will need to be diverted underground and either re-routed around planned development or included within the developments with an easement for the route of the cables.

5.2.4 It is likely that significant offsite reinforcement for the network to provide the full range of supply needed for the fully completed development could be completed in a parallel manner to the phased development across the full site.

5.3 GAS

5.3.1 There is no gas mains on the development site, although the site is in close proximity to the medium pressure gas main in Elvington Lane, so should be able to affect a connection to this gas main to supply areas of the development.

5.3.2 There will be a requirement to provide site reinforcement works in relation to the full scale of the development and it is considered that this work can be completed in parallel to the development of the site.

5.4 TELECOMMUNICATIONS

5.4.1 There is BT infrastructure located within and surrounding the site, which is expected to be utilised to make initial connections to for an allocated number of development units.

5.4.2 There will be a requirement to divert or create easements for a small of cables that are required to be retained, although the connectivity of the cables recorded in the airfield area of the site are recommended to be further investigated to ascertain any future need prior to abandonment of these supplies.

- 5.4.3 There are existing mobile phone masts adjacent to the development site that will provide some coverage for early allocation of development units, although future masts will be needed to provide both further coverage and upgrades to the most modern versions of mobile signal available (e.g. 5G)

5.5 POTABLE WATER

There are a small number of existing private supplies within the development site; one of which on the airfield part of the site, is proposed to be used to serve a small allocation of housing units, with the others serving local farms managed by easements.

YW have indicated that they are able to supply a development of this size and there are options as to where such a future supply would enter the site, dependent upon further discussions with YW regarding the most suitable manner of getting potable water to the site.

It is expected that the development of a long term connection for the full scale of the development, will be completed in parallel to the completion of constructed units within the development to achieve a supply sufficient to serve the entire developed site.

5.6 DRAINAGE

- 5.6.1 There is no provision of public foul drainage within the development, although it is expected that there will be some public sewers located adjacent to the south east of the site.
- 5.6.2 A new provision to receive foul wastewater from the site will need to be made with Yorkshire Water to supply the site. It is expected that this will include a requirement for a pumping station and rising main to take the flow to Naburn WwTW.
- 5.6.3 The discharge of wastewater from a small allocation of development may be possible in either a temporary or permanent capacity to the expected public sewers near the site, which will need to be agreed with YW.
- 5.6.4 The provision of surface water drainage is discussed in the WSP report ' Report 70011808-rpt-001 – Langwith- Flood Risk and surface water management Technical appraisal, which sets out a sustainable strategy for the management and control of surface water within the development. .

5.7 DISTRICT HEAT NETWORK

- 5.7.1 The allocation site could be supplied by a central energy centre providing the heat source for all heating and hot water requirements. The primary heating plant in such an energy centre would comprise gas fired boilers, combined heat and power unit (CHP), thermal stores and primary circulation pumps.
- 5.7.2 Primary pumps located in the energy centre would distribute heating water via a variable volume district heating circuit. Large diameter primary heating pipework would distribute underground within the public realm to serve secondary plant areas located in each school, retail and residential area.

5.8 DEVELOPMENT SUMMARY

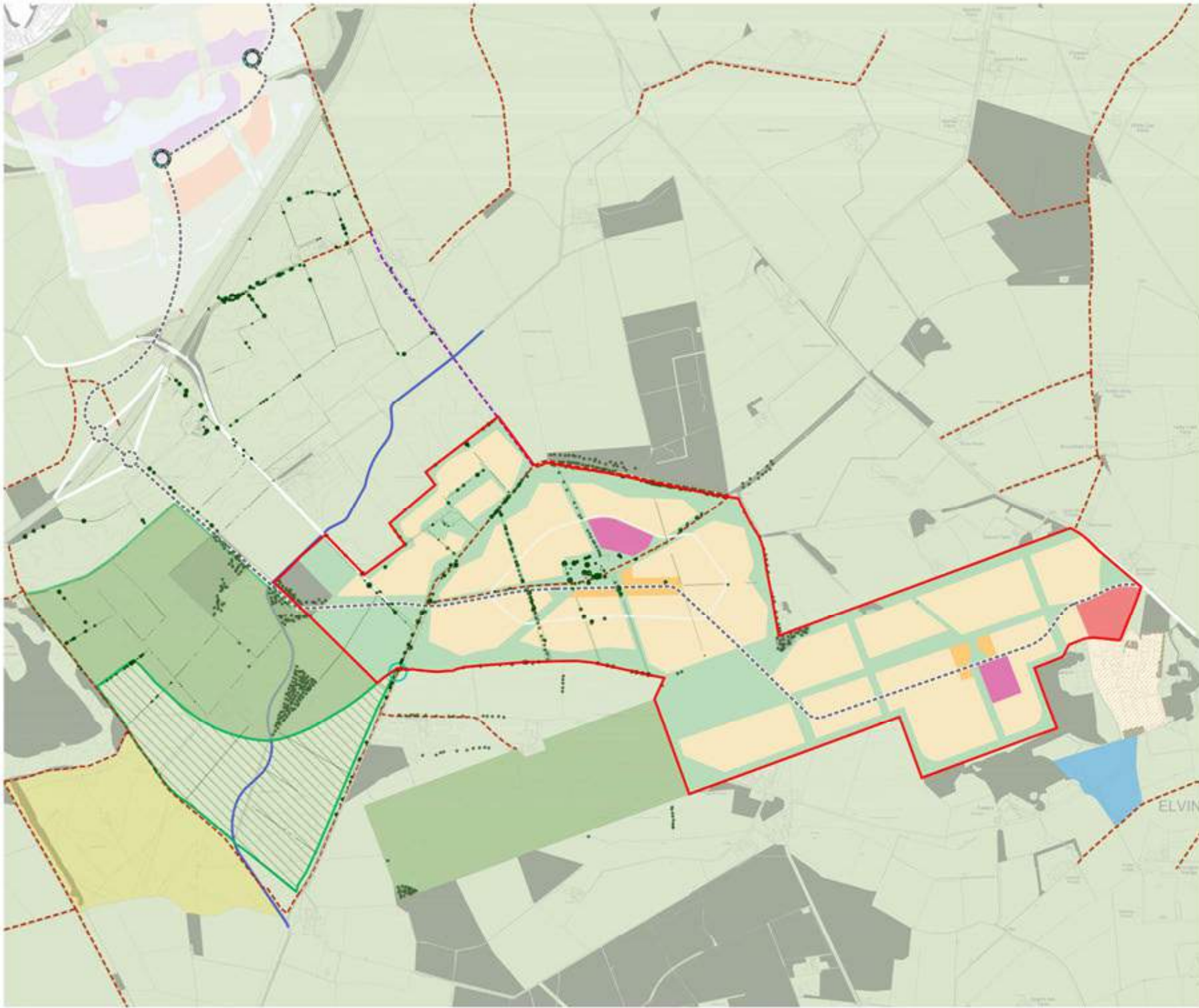
- 5.8.1 There exists within the allocation site viable means to provide initial connections into the surrounding infrastructure to allow an allocated number of units to be developed on the site, during the process of upgrading and reinforcement of the wider supply network in order to serve the final development magnitude.
- 5.8.2 The location of the site near major utility corridors means there is a viable means of providing services to this development, with practical and achievable options for creating such connections
- 5.8.3 Service providers contacted have indicated the work which they need to complete to provide reinforcement and upgrades to their networks surrounding the allocation site, which should enable the future delivery of required utility services for the development of 5000 units with the associated commercial, community and education provisions that indicate that the allocation site is a viable, achievable proposal.

Appendix A

**POTENTIAL FORM (CONCEPT ONLY) OF FUTURE DEVELOPMENT
OF THE SITE**

APPENDIX A-1

**DRAWING 23910.9610 – CONCEPT MASTERPLAN
– REV -).**



- Allocation Site Boundary
- Residential
- Public Open Space
- Primary Schools
- Retail, Employment, Community Uses
- Extension to Air Museum and Memorial Arboretum
- Existing Business Park
- Proposed Elvington Business Park
- Habitat Enhancement Area
- Ecological Mitigation Area
- Strategic Pedestrian / Cycle connections
- Improved connectivity and opportunities for access to the University, ED and wider established network of footpaths, including Minister Way
- Tilmore Drain
- Heslington Tilmore 5052
- Bus routes
- Gated Access to Langwith Sley (prevents vehicular access to 5052)

Project
Longwith Garden Village

Drawing Title
Concept Masterplan

Date	Scale	Drawn by	Check by
07.08.16	1:7500@A1	PT	MFV
Project No	Drawing No	Revision	
23190	0610		

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APPENDIX 13

MODIFICATIONS PROPOSED TO POLICIES (AND PARAGRAPHS)

Paragraph 2.5: Provide Good Quality Homes and Opportunities

- 2.5 To ensure a continuous supply of housing opportunities throughout the plan period sustainable sites should be brought forward. By the end of the plan period sufficient sites will have been identified for viable and deliverable housing sites with good access to services and public transport to meet the housing needs of the current population and the future population linked to the city's economic growth ambitions. This will require the provision of sufficient land for at least 953 ~~867~~ dwellings per annum and will include substantial areas of land for 'garden village' development delivering exemplar new sustainable communities at Land West of Wiggington Road, Land East of Metcalfe Lane and Land West of Elvington Lane, along with major sustainable urban extensions such as British Sugar and York Central. In addition the plan will optimise the delivery of affordable housing to meet identified need subject to not compromising viability of development sites; and address the needs of specific groups.

Policy DP1: York Sub Area

The approach taken in the Local Plan to development will reflect the roles and functions of place in the Leeds City Region, the York and North Yorkshire Sub Region and the functional York Sub Area. It will aim to ensure the following.

- i. York fulfils its role as a key economic drivers within both the Leeds City Region and the York, North Yorkshire and East Riding LEP areas.
- ii. York City Centre's role as a shopping and leisure destination within the wider Yorkshire and Humber area is strengthened.
- iii. The housing needs of City of York's current and future population including that arising from economic and institutional growth is met within the York local authority area. Housing needs will, in part, be met through the creation of a new garden village (ST15) in the south east of York.
- iv. The further success of regionally and sub regionally important higher and further education institutions within the plan area is supported.
- v. City of York's role as a key node for public transport is strengthened, including improvements to the Leeds-York-Harrogate rail line, improved access between York and Scarborough (the east coast) and project to improve national connectivity, including links to the new high speed rail system (HS2).
- vi. City of York's outstanding historic and natural environment is conserved and enhanced recognising its wider economic importance to increased investment, employment and wealth within both the Leeds City Region and York, North York and East Riding LEP area.
- vii. The integrity of important landscapes, biodiversity and areas of environmental character (including the network of strategic green corridors) that extend beyond the City of York boundaries and safeguarded.
- viii. A Green Belt is defined around York which will safeguard the special character and setting of the historic city, the outer boundary of which will be about 6 miles from the city centre.
- ix. Development within the City of York area will not lead to environmental problems including flood risk, poor air quality and transport congestion for adjacent local authority areas.

Policy SS1: Delivering Sustainable Growth for York

Development during the plan period will be consistent with the priorities below.

- Provide sufficient land to accommodate an annual provision of around ~~650~~ new jobs that will support sustainable economic growth, improve prosperity and ensure that York fulfils its role as a key economic driver within both the Leeds City Region and the York, North Yorkshire and East Riding Local Enterprise Partnership area.
- Deliver a minimum annual provision of ~~953~~ ~~867~~ new dwellings over the plan period to 2032/33 and post plan period to 2037/38. This will enable the building of strong, sustainable communities through addressing the housing and community needs of York's current and future population.
- In order to deliver the required new dwellings, a new garden village will be developed in the south east of the City (site allocation ST15).

Commented [GL1]: Job provision may need to be amended to reflect additional planned housing.

The location of development through the plan will be guided by the following five spatial principles.

- Conserving and enhancing York's historic and natural environment. This includes the city's character and setting and internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function.
- Ensuring accessibility to sustainable modes of transport and a range of services. Preventing unacceptable levels of congestion, pollution and/or air quality.
- Ensuring flood risk is appropriately managed.
- Where viable and deliverable, the re-use of previously developed land will be phased first.

York City Centre, as defined on the Policies Proposals-Map, will remain the focus for main town centre uses¹.

The identification of development sites is underpinned by the principle of ensuring deliverability and viability. Additionally, land or buildings identified for economic growth must be attractive to the market.

¹ **Main town centre uses as defined by the NPPF:** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities and the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Policy SS13: Land West of Elvington Lane

The development of Land West of Elvington Lane (ST15) supports the Local Plan vision in delivering a new sustainable garden village for York. It will delivery approximately ~~3,339-4,000~~ dwellings, around ~~2,200-2,400~~ units of which will be delivered within the plan period. In addition to complying with the policies within this Local Plan, the site must be ~~masterplanned and~~ delivered in accordance with the following key principles.

- i. Create a new 'garden' village that reflects the existing urban form of York as a compact city surrounded by villages.
- ii. Deliver a sustainable housing mix in accordance with the Council's most up to date Strategic Housing Market Assessment and affordable housing policy.
- iii. Be of a high design standard, and ~~to~~ reflect the existing settlement form of villages around the main urban area of York in-keeping with the existing urban form. The south eastern and south western boundaries of the site are less well contained than the north so it will be important for the site to establish its own landscape setting.
- iv. Create new open space (as shown on the ~~policies proposals~~ map) within the site to maintain views of the Minster and existing woodland.
- v. Impacts on biodiversity within the site and ~~on land at OS10 zone of influence~~ will be addressed by following the mitigation hierarchy with the overall aim being to prevent harm to existing biodiversity assets in the area, delivering no net loss for biodiversity and maximise further benefits for biodiversity through a net gain approach. ~~Where required Loss~~ compensatory measures such as habitat creation, enhancement and long-term management should take full account of the extent and quality of the asset being lost or damaged and equivalent or enhanced habitats should be provided.
- vi. Follow a mitigation hierarchy to first seek to avoid impacts, then to mitigate unavoidable impacts or compensate unavoidable residual impacts on Heslington Tillmore SSSI and the Lower Derwent Valley SPA/Ramsar through the:
 - Incorporation of additional habitat within a new nature conservation area created principally to compensate for biodiversity impacts from the development (as shown on the ~~policies proposals~~ map) including a buffer of wetland habitats, a barrier to the movement of people and domestic pets on to the SSSI and deliver further benefits for biodiversity. A buffer of at least 400m from the SSSI will be required in order to adequately mitigate impacts unless evidence demonstrates otherwise; and
 - Provision of a detailed site wide recreation and access strategy to minimise indirect recreational disturbance resulting from development and complement the wetland habitat buffer area which will be retained and monitored in perpetuity. A full understanding of the proposed recreational routes is required at an early stage.
- vii. Deliver ecological mitigation and compensation measures both on and off-site 5-years prior to, or alongside, the commencement of any development. Prior to occupation of any development the compensatory measures must be available and suitable for use by wildlife as appropriate. They must be supported by a long term management plan, and be retained and monitored in perpetuity.
- viii. Protect the character, setting and enjoyment of Minster Way.

- ix. Provide an appropriate range of shops, services and facilities including social infrastructure such as health, social, leisure, cultural and community uses to meet the needs of future residents, made early in the scheme's phasing in order to allow the establishment of a new sustainable community. This should be principally focused around a new local centre.
- x. Deliver new on-site education provision to meet nursery and, ~~primary and potentially secondary demand~~ to be assessed based on generated need. New nursery and, ~~primary and potentially secondary~~ provision will be required to serve the earliest phases of development.
- xi. ~~Demonstrate that all transport issues have been addressed,~~ in consultation with the Council and Highways England as necessary, ~~to~~ ensure sustainable transport provision at the site is achievable. The impacts of the site individually and cumulatively with site's ST7, S78, ST9, ST14, ST27, ST35 and ST36 should be addressed.
- xii. Ensure provision of necessary transport infrastructure to access the site with primary access via the A64 (as shown on the ~~policies proposals~~ map) and a ~~potential~~ secondary access via Elvington Lane. The capacity of the local highway network including Elvington Lane and junctions is limited.
- xiii. Retain Common Lane/Long Lane/Langwith Stray as cycle/pedestrian routes only to ensure protection of the character of Heslington Village. These routes are very lightly trafficked roads, and could provide pleasant cycle and pedestrian routes from the site to Heslington. It is essential that there is no vehicular transport access to Heslington village along these routes to ensure the setting of Heslington village is maintained.
- xiv. Explore the potential for local bridleways (e.g. Fordlands Road/Forest Lane) running through or near the site to be used as cycle routes.
- xv. Provide dedicated secure vehicular, cycle and pedestrian access for existing local residents and landowners to be agreed with the community of Heslington. Appropriate solutions would need to ensure access is preserved for existing residents and landowners developed in consultation with the community of Heslington.
- xvi. Delivers high quality, frequent and accessible public transport services through the whole site which provide links to new community facilities, as well as to York city centre and other appropriate service hubs, including University of York. A public transport hub at the local centre should provide appropriate local interchange and waiting facilities for new residents. It is envisaged such measures will enable upwards of 15% of trips to be undertaken using public transport.
- xvii. Optimise pedestrian and cycle integration, connection and accessibility in and out of the site and connectivity to the city and surrounding area creating well-connected internal streets and walkable neighbourhoods, to encourage the maximum take-up of these more 'active' forms of transport (walking and cycling).
- xviii. Exploit synergies with the proposed university expansion in terms of site servicing including transport (public and private), energy and waste.

Policy H1: Housing Allocation

In order to meet the housing requirement set out in Policy SS1 the following sites, as shown in on the [policies proposals map](#) and set out in the schedule below are proposed for residential development.

Planning applications for housing submitted for these allocations will be permitted if in accordance with the phasing indicated. An application on an allocated site in advance of its phasing will be approved if:

- The allocations' early release does not prejudice the delivery of other allocated sites phased in an earlier time period;
- The release of the site is required now to maintain a five year supply of deliverable sites; and
- The infrastructure requirements of the development can be satisfactorily addressed.

Where developers are seeking revision to existing planning permissions and associated conditions and S106 arrangements, changes in market conditions will be taken into account

Where sites contain existing open space this will be an important consideration in the development of the site and the open space needs of the area will need to be fully assessed.

This policy applies to all the sites listed in Table 5.1 overleaf:

Table 5.1: Housing Allocations

Allocation Reference	Site Name	Site Size (ha)	Estimated Yield (Dwellings)	Estimated Phasing
All housing allocations remain unchanged except for:				
ST15	Land West of Elvington Lane	159.0 <u>204</u>	3,339 <u>4,018</u>	Lifetime of the Plan and Post Plan Period (Years 1-21)

Policy HW2: New Community Facilities

~~Applications for strategic residential developments must be accompanied by an audit of existing community facilities and their current capacity, prepared by the applicant.~~ Developments that place additional demands on existing services will be required to provide proportionate new or expanded community facilities, to meet the needs of existing and future occupiers. In the case of strategic sites (Section 3) provision should be made as required by the relevant policy. These should be provided on site or developer contributions will be sought to provide these additional facilities.

As the population grows and population demographics change over the plan period, new facilities will be required. The Council will work with communities and other partners to help address deficits in community facilities.

The Council will support applications for new community facilities when an existing deficit or future need has been identified. Where appropriate, facilities should be designed to be adaptable and multi-purpose, in order to future-proof services and enable a wide range of community uses. Any new or expanded facilities must be accessible and well-served by public transport, footpaths and cycle routes.

Policy HW4: Childcare Provision

The Council will support development that helps meet the city's need for childcare provision.

~~Any New~~ strategic sites will be expected to ~~provide new or expanded~~ ~~conduct an audit of existing~~ childcare facilities ~~as identified in Strategic Sites policies (Section 3) and their current capacity~~. If increased demand from new residents would be expected to exceed the existing capacity of facilities in the vicinity, additional facilities must be incorporated into the masterplanning of the sites and supported by developer contributions unless it can be demonstrated that this is not viable or deliverable.

Proposals which fail to protect existing childcare facilities will be refused unless it can be demonstrated that the provision is no longer required, no longer viable, or if equivalent replacement facilities can be provided elsewhere.

Applications for new childcare provision should be accompanied by an assessment that demonstrates the need for additional childcare provision in the locality. The Council will work with schools, parents and carers to ensure that their needs are understood.

Any proposed new or replacement childcare facilities should be sited in accessible locations within or near to the areas of identified need, they should be well-served by public transport, and be easily accessible by walking and by bike.

Policy HW5: Healthcare Services

Primary Care

~~The Council will work closely with GPs and the NHS Vale of York Clinical Commissioning Group (or any successor organisation) to understand the current and projected primary care needs of communities.~~ The Council will support the provision of new or enhanced primary care services when there is an identified need.

Improved, enlarged or additional primary healthcare facilities will be required as identified in Strategic Sites policies (Section 3)~~to support residential developments that place additional demands on services beyond their current capacity, in line with the National Planning Policy Framework. If increased demand from other developments is proven to exceed the capacity of facilities in the vicinity of the site, on-site provision or~~ Developer contributions will be required to support the increase in provision. An assessment of the accessibility and capacity of existing primary care services will be required at the application stage.

Proposals which fail to protect existing primary care services, or involve the loss of services, will not be supported, unless it can be demonstrated the facilities are no longer required or that relocating facilities would better meet the community's needs.

Any new primary care facilities must be easily accessible by public transport, walking and cycling.

Secondary Care

The Council will work closely with the York Teaching Hospital NHS Foundation Trust, with the Tees, Esk and Wear Valley NHS Foundation Trust (or any successor organisations), to understand their needs; help ensure their sites are fit for purpose; and enable them to provide safe, effective and sustainable healthcare, for the plan period and beyond.

York Teaching Hospital NHS Foundation Trust

The Council will support the redevelopment of York Teaching Hospital NHS Foundation Trust (as identified on the Policies Proposals-Map) to enable it to expand its capacity; to uphold and improve the quality of secondary care it delivers; and ultimately to remain on its existing site for the long term, ensuring the optimum delivery of secondary care services in York.

The Council will support the redevelopment of the staff car park on the existing York Teaching Hospital NHS Foundation Trust site to meet its immediate need for increased capacity in Accident and Emergency. The Council will work with York Teaching Hospital NHS Foundation to develop a new Travel Plan, to ensure that the loss of car parking facilities will not compromise access or care.

To enable the Trust to expand existing clinical facilities the Council will support the development of the extension to York NHS Hospital Trust site (as shown on the Policies Proposals-Map as HC1), for health and social care purposes, such as a GP practice or short-term residential care. The Council will continue to work with the Trust to help them make additional changes to their site as their needs change over the plan period.

Tees, Esk and Wear Valley NHS Foundation Trust

The Council will support Tees, Esk and Wear Valley NHS Foundation Trust in the relocation of services previously provided at Bootham Hospital to a new site on Haxby Road, in order to provide the best patient care (as shown on the policies proposals-map as HC2). Future consideration of the Bootham Park Hospital site must follow a full appraisal of the significance of the historic buildings, landscape and archaeology on site. Any redevelopment proposals must raise out of this understanding, in order to enhance or better reveal their significance into the long term.

Policy HW6: Emergency Services

~~The Council will work closely with Yorkshire Ambulance Service NHS Foundation Trust, North Yorkshire Police, and North Yorkshire Fire and Rescue Service, to ensure that their changing needs are understood.~~
The Council will support the development of new emergency service facilities, ~~where there is a demonstrable need, and in those appropriate~~ locations that enable emergency service providers ~~them~~ to meet necessary response times.

The Council will support the Yorkshire Ambulance Service NHS Foundation Trust's new 'Hub and Spoke' estate model. Hubs provide essential clinical and maintenance and facilities, whilst spoke facilities provide additional opportunities for ambulances to be stationed close to areas of demand. The Council will support the development of additional sites for ambulances at key points in densely populated areas, close to major highways.

The following sites have been identified as requiring additional spoke facilities:

- ST7: Land East of Metcalfe Lane
- ST8: Land North of Monks Cross
- ST9: Land North of Haxby
- ~~ST14~~ST15: Land West of Wigginton Road

Such facilities would need to provide for:

- A 6 x 3m serviced building with water, electricity and drainage.
- Parking facilities for two ambulances.

The facilities would need to be located within the development and close to the main highway.

Policy ED3: Campus East

The continuing development of University of York Campus East is supported alongside the expansion site at ST27 (University of York Expansion). Development will be permitted in accordance with the uses outlined in Policy ED1 and the following parameters:

- the development footprint (buildings, car parking and access roads) shall not exceed 23% of the 65ha area allocated for development;
- total car parking shall not exceed 1,500 spaces subject to reserved matters approval by the Council;
- the maintenance of a parkland setting;
- additional student housing shall be provided to cater for expansion of student numbers which is clearly evidenced in terms of demand. Any additional student housing provision on Campus West (over and above the existing 3,586 bed spaces) shall be taken into account when assessing need; and
- an annual student accommodation survey shall be submitted to the Council.

As shown on the ~~policies proposals~~-map, 21.5ha of land to the south of the existing Campus East site is allocated for the future expansion of the university during the plan period (ST27: University of York Expansion). Campus East and ST27 will across both sites deliver up to 25ha of B1b knowledge based businesses including research led science park uses identified in the existing planning permission for Campus East.

ST27 must create an appropriately landscaped buffer ~~must be created~~ between development and the A64 in order to mitigate heritage impacts in terms of the historic character and setting of the city and to maintain key views.

A development brief will be prepared for ST27, covering site considerations, including landscaping, design, local amenity, accessibility and transport requirements (including opportunities to exploit public and private transport synergies with ST15).

Policy D1: Placemaking

Development proposals will be supported where they improve poor existing urban and natural environments, enhance York's special qualities and better reveal the significances of the historic environment. Development proposals that fail to take account of York's special qualities, fail to make positive design contribution to the city, or cause damage to the character and quality of an area will usually be refused.

Development proposals should adhere to the following detailed design points:

i. Urban Structure and Grain

- enhance, respect and complement the historic arrangement of street blocks, plots and buildings, where possible restoring old patterns of urban grain where these have been damaged or obscured.
- enhance and complement the character and appearance of landscape, city parks, landforms, open space, planting and boundary treatment.

ii. Density and Massing

- demonstrate that the resultant density of a development proposal will be appropriate for its proposed use and neighbouring context.
- demonstrate that the combined effect of development does not dominate other buildings and spaces paying particular attention to adjacent buildings or parks of architectural or historic significance.

iii. Streets and Spaces

- promote ease of public pedestrian and cyclist movement and establish natural patterns of connectivity with the fabric of the city. Spaces and routes must be attractive, safe and uncluttered and clearly prioritise pedestrians and cyclists over vehicles.
- promote legibility through development by providing recognisable routes, hierarchy of routes, intersections, intersections, incidental spaces and landmarks.
- are designed to improve the quality of the public realm and the wider environment for all.
- provide a pattern of continuity and enclosure, dependant on circumstances, to reflect the need for different types of space for different types of activity including clearly defining private from public space, and mediate between the two.
- designed to reduce crime and the fear of crime and promote public safety throughout the day and night.

iv. Building Heights and Views

- respect York's skyline by ensuring that development does not challenge the visual dominance of the Minster or the city centre roofscape.
- respect and enhance views of landmark buildings and important vistas.

v. Character and Design Standards

- ensure proposals are not a pale imitation of past architectural styles.
- ensure appropriate building materials are used.
- meet the highest standards of accessibility and inclusion.
- demonstrate the use of best practice in contemporary urban design and place making.
- integrate car parking and servicing within the design of development so as not to dominate the street scene.
- create active frontages to public streets, spaces and waterways.
- create buildings and space that are fit for purpose but are also adaptable to respond to change.
- create place that feel true to their intended purpose.
- maximise sustainability potential.

Policy GI2: Biodiversity and Access to Nature

In order to conserve and enhance York's biodiversity, any development should ~~where appropriate~~:

- i. avoid loss or significant harm to Sites of Importance for Nature Conservation (SINCs), whether directly or indirectly. Where it can be demonstrated that there is a need for the development in that location and the benefit outweighs the loss or harm the impacts must be adequately mitigated against, or compensated for as a last resort;
- ii. ensure the retention, enhancement and appropriate management of features of geological, or biological interest, and further the aims of the current Biodiversity Audit and Local Biodiversity Action Plan;
- iii. take account of the potential need for buffer zones around wildlife and biodiversity sites, to ensure the integrity of the site's interest is retained;
- iv. result in net gain to, and help to improve, biodiversity;
- v. enhance accessibility to York's biodiversity resource where this would not compromise their ecological value, affect sensitive sites or be detrimental to drainage systems;
- vi. maintain and enhance the rivers, banks, floodplains and settings of the Rivers Ouse, Derwent and Foss, and other smaller waterways for their biodiversity, cultural and historic landscapes, as well as recreational activities where this does not have a detrimental impact on the nature conservation value;
- vii. maintain water quality in the River Ouse, River Foss and River Derwent to protect the aquatic environment, the interface between land and river, and continue to provide a viable route for migrating fish. New development within the catchments of these rivers will be permitted only where sufficient capacity is available at the appropriate wastewater treatment works. Where no wastewater disposal capacity exists, development will only be permitted where it can be demonstrated that it will not have any adverse effect on the integrity of the River Derwent, Lower Derwent Valley and Humber Estuary European Sites;
- viii. maintain and enhance diversity of York's Strays for wildlife; and
- ix. ensure there is no detrimental impact to the environmental sensitivity and significant Lower Derwent Valley and its adjacent functionally connected land which whilst not designated, are ultimately important to the function of this important site.

Policy GI6: New Open Space Provision

All residential development proposals should contribute to the provision of open space for recreation and amenity. The successful integration of open space into a proposed development should be considered early in the design process. The precise type of on-site provision required will depend on the size and location of the proposal and the existing open space provision in the area. Where there are deficiencies in certain types of open space provision in the area surrounding a proposed development, the Council will seek variations in the component elements to be provided by the developer in order to help to overcome them. Requirements will be calculated using the Council's up to date open space assessment and will be in line with the Council's Green Infrastructure Strategy.

The Council will encourage on-site provision where possible but off-site provision will be considered acceptable in the following circumstances:

- i. if the proposed development site would be of insufficient size in itself to make the appropriate provision (in accordance with the Council's standards) feasibility within the site; or
- ii. in exceptional circumstances, if taking into account a site's characteristics including but not limited to the accessibility/capability of existing open space sites/facilities and the circumstances of the surrounding area the open space needs in the context of a up-to-date Playing Pitch and Built Sport Facility Strategy, it can be demonstrated that of the proposed residential development can be met more appropriately by providing either new or enhanced provision off-site;
- iii. on strategic sites, where through strategic masterplanning agreements that provide for green infrastructure approaches which make accessible provision beyond allocated site boundaries. Open space standards as set out in the most up to date open space evidence base document should still be used as a guide to overall provision.

New open space is identified on the [policies proposals](#)-map at:

- OS1: Land North of Manor Church of England Academy
- OS2: Land to North of Poppleton Juniors, Millfield Lane, Poppleton
- OS5: Germany Beck
- OS6: Land abutting the River Foss at Hewcroft

Indicative new significant areas of open space have been identified in connection with the following strategic sites, as shown on the [policies proposals](#)-maps:

- OS7: Land at Minster Way at ST7
- OS8: New Parkland to the East of ST8
- OS9: New Recreation and Sport Provision to the south of ST9
- ~~OS10: New Area for Nature Conservation on land to the South of A64 in association with ST15~~ Two new significant areas of open space have been identified as part of ST15. The area falls outside the ST15 allocation, but is intrinsically linked to it, as part of a biodiversity enhancement area. This area will have restricted public access.
- OS11: Land to the East of ST31

- OS12: Land to the East of ST35

This new open space will be complemented by further on-site provision of local green and open space (required in this and other relevant sections of the plan), and both should be planned cohesively in order, where appropriate to:

- manage impacts on the city's historic character and setting;
- mitigate and compensate for ecological impacts, and provide for ecological enhancement;
- meet open space requirements arising from new development;
- accommodate drainage infrastructure, flood storage and attenuation;
- retain and enhance landscape and heritage features; and
- frame pedestrian and cycle linkage.

The precise delineation and extent of the new open space will be set through detailed masterplanning and the planning process. The areas indicated on the ~~policies proposals~~-map are a guide to general extent based on current understanding of site and other conditions.

Policy CC1: Renewable and Low Carbon Energy Generation and Storage

New buildings must achieve a reasonable reduction in carbon emissions of at least [28%] unless it can be demonstrated that this is not viable. This should be achieved through the provision of renewable and low carbon technologies in the locality of the development or through energy efficiency measures. Proposals for how this will be achieved and any viability issues should be set out in an energy statement.

Commented [GL1]: The precise figure to be justified by evidence.

Commented [GL2]: It is more appropriate to include this in Policy CC2.

Renewable and low carbon energy generation developments will be encouraged and supported in York. We will work with developers to ensure that suitable sites are identified and projects developed, working with local communities to ensure developments have their support. Developments on brownfield land will be encouraged.

All applications will also need to consider the impact the scheme may have on:

- i. York's historic character and setting, including the sensitivity of the scheme to the surrounding landscape and proximity to air fields and other sensitive land use, including conservation areas;
- ii. local communities and residential amenity resulting from development, construction and operation such as air quality, atmospheric emissions, noise, odour, water pollution and the disposal of waste;
- iii. the location in terms of the scale and the proposal and new grid connection lines;
- iv. national and internationally designated heritage sites or landscape areas, including the impact of proposals close to their boundaries;
- v. nature conservation sites and features, biodiversity and geodiversity, including protected local sites and other sites of nature conservation importance, and potential effects on setting, habitats, species and the water supply and hydrology of such sites;
- vi. the road network, taking into account the accessibility of the site by road and public transport and also the proximity to the renewable fuel source; and
- vii. agriculture and other land-based industries.

Any application for renewable energy would also need to consider the areas of potential and other technical requirements identified in the Council's most up to date Renewable Energy Study.

Strategic sites will be required to produce energy masterplans to ensure that the most appropriate low carbon, renewable and energy efficient technologies are deployed at each site, taking into account local factors and the specifics of the masterplans.

Proposals for renewable and low carbon energy storage developments will be supported and encouraged. Developments should be sited a suitable distance from major residential areas and have suitable fire suppression procedures.

Policy CC2: Sustainable Design and Construction of New Development

Developments which demonstrate high standards of sustainable design and construction will be encouraged. Development proposals will be required to demonstrate energy and carbon dioxide savings in accordance with the energy hierarchy and water efficiency, unless it can be demonstrated this is not feasible or viable. Development proposals will be expected to consider good practice adaptation principles for climate resilience in their design, construction and operation.

Sustainable Design and Construction of New Development

Proposals will be supported where they meet the following:

All new residential buildings should achieve, where feasible and viable:

- i. at least a 19% reduction in Dwelling Emission Rate compared to the Target Emission Rate (calculated using Standard Assessment Procedure methodology as per Part L1A of the Building Regulations 2013); and
- ii a water consumption rate of 110 litres per person per day (calculated as per Part G of the Building Regulations).

All new non-residential buildings with a total internal floor area of 100m² or greater should achieve BREEAM 'Excellent' (or equivalent), where feasible or viable.

Strategic site developments should undertake a BREEAM Communities assessment (or equivalent).

All new residential and non-residential developments will be required to submit an energy statement which demonstrates how these requirements will be met. This should include a sustainability checklist, which shows how principles for sustainable design, construction and operation will be achieved.

Conversion of Existing Buildings and Change of Use

Application for conversion of existing residential buildings or change of use to residential should achieve BREEAM domestic refurbishment 'very good' and non-residential conversions or change of use will need to achieve BREEAM 'excellent', where feasible or viable.

If proposals relate to buildings of heritage and conversion value these standards would only be required where they can be achieved in a manner consistent with the appropriate conversion of that asset. The extent they can be achieved must be demonstrated by the applicant.

Consequential Improvement to Existing Dwellings

When applications are made to extend dwellings, proposals will be expected to demonstrate reasonable and proportionate improvements to the overall energy performance of the dwelling. This will be in addition to the requirements of Part L of the Building Regulations.

Policy T2: Strategic Public Transport Improvements

The Plan will support the delivery of general and specific junction, highway or public transport infrastructure enhancements as set out in the Local Transport Plan 2 2011-2031 (LTP3) and subsequent associated (or complementary) investment programmes.

In addition, the strategy public transport infrastructure, as listed below, and (if requiring land outside of the highway boundary to implement) as identified on the [Proposals-Policies Map](#), will be implemented in the short-term and medium-term timescales shown, and pursued in the long-term timescale shown.

Short-term (2017-22)

- i. The following highway enhancements to improve public transport reliability
 - public transport interchange improvements at York State,
 - Leeman Road/Shipton Road Corridor Improvements,
 - improve bus routing and waiting facilities adjacent to the memorial gardens in Leeman Road,
 - citywide improvements to the urban traffic control system, and
 - a package of physical measures to improve operation of the bus fleet and bus services in York city centre.

Medium-term (2022-27)

- ii. Further expansion of the Askham Bar and Poppleton Bar Park & Ride facilities to match rising demand.
- iii. The following highway enhancements to improve public transport services and reliability
 - a segregated grade-separated bus (and pedestrian/cycle) route across A1237 to improve connectivity with the areas to the north-west of the city, and
 - a dedicated public transport/cycle route linking the new settlement (ST15) to a suitable access on York's highway network in the urban centre of York (subject to confirmation of developers access proposals to site ST15 so not shown on the ~~policies -proposals~~ map). [Synergies between ST15, the University and its proposed expansion should be exploited.](#)

Long-term (2027-32)

- iv. A new railway station at Haxby.
- v. Traffic restraint measures in the city centre to improve public transport reliability.

The plan will also support (subject to compliance with other policies in the Plan) development proposals that

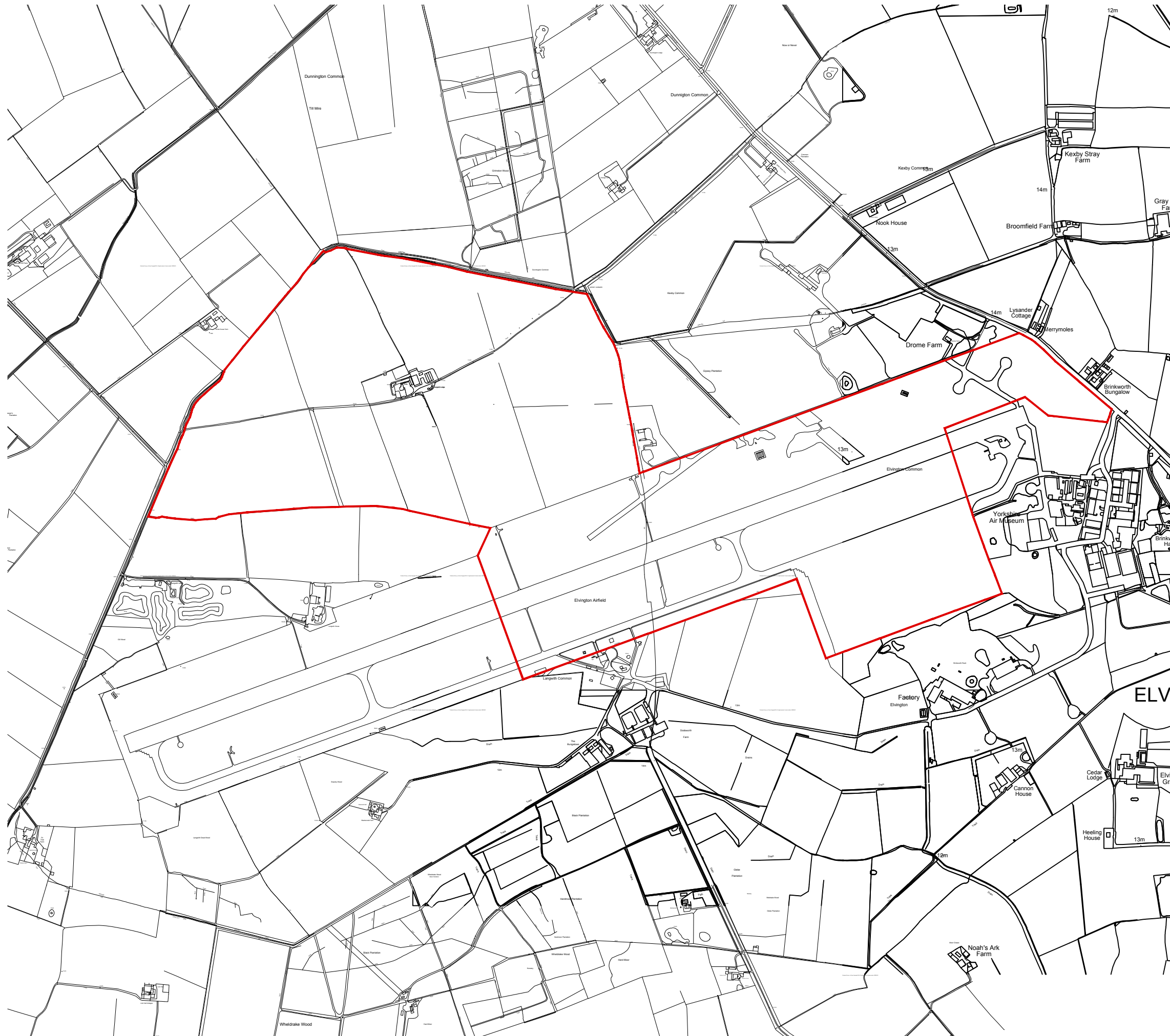
- vi. improve rail access and connectivity, including but not limited to new railway stations/halts for heavy or light rail services, and capacity improvements and other enhancements (including new technology applications, where appropriate) on rail lines running into or through York; or
- vii. provide highway enhancements to improve public transport reliability; or

viii. facilitate the relocation of the Designer Outlet Park & Ride facility.




APPENDIX 14

MODIFICATIONS PROPOSED TO POLICIES MAP (REG 19, 2018); PLANS



The scaling of this drawing cannot be assured
 Revision _____ Date _____ Drn _____ Ckd _____

 Langwith Reg 19 2018

Project
Langwith Garden Village

Drawing Title
ST15 Adjusted

Date	Scale	Drawn by	Check by
03.04.18	1:12500 @ A3	KT	MV
Project No	Drawing No	Revision	
23190	9938	-	

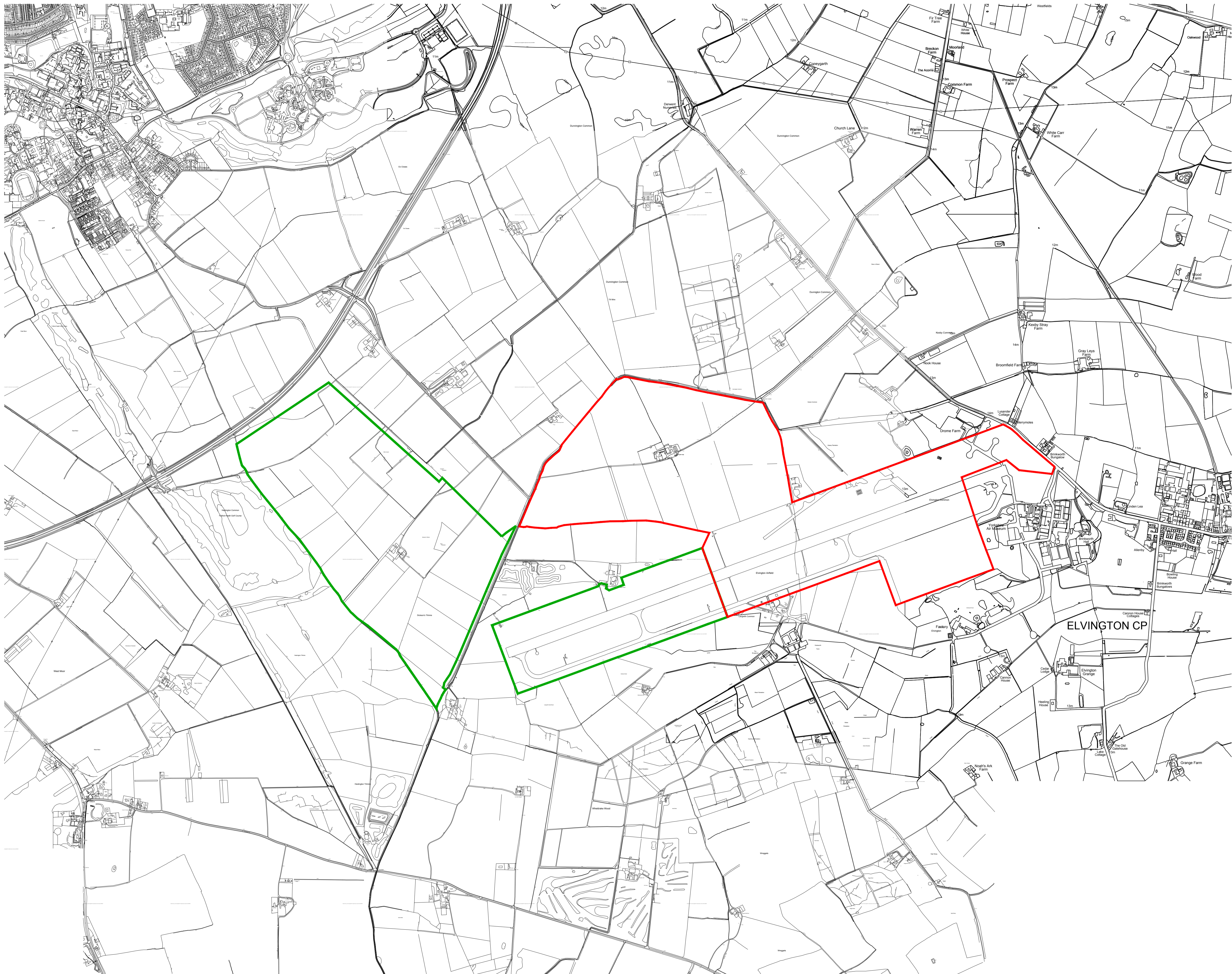
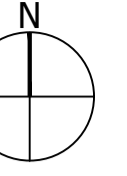




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-  ST15 - Adjusted Boundary
-  OS10 - Adjusted Ecological Mitigation Boundary

Project
Langwith Garden Village

Drawing Title
Site Boundary Plan (Revised ST15 and OS10)

Date 28.03.18	Scale 1:10,000@A1	Drawn by KT	Check by MV
Project No 23190	Drawing No 9945	Revision -	



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APPENDIX 15

REVIEW OF CYC'S OAN (2016)

A REVIEW OF THE CURRENT OAN FOR THE CITY OF YORK (2016)

Abstract

A measured review of the approach to York's OAN, with alternative proposals for the OAN starting point and affordability led market signals adjustment.



Understanding Data for Sandby (York Ltd) and
Oakgates/Caddick Groups

“Completions of new houses have .. been below projected requirements for a number of years, with high affordability ratios in comparison with wages for large parts of the local population.”

Contents

1. Headlines [page 2-3](#)
2. Significant issues with the SHMA [pages 4-9](#)
 - Student Numbers
 - 2012 vs 2014 SNPP
 - Economic balance
 - Affordability
3. An Alternative and updated OAN starting point [page 10](#)
4. An Alternative and robust approach to affordability/market signals [pages 11-15](#)

Introduction

A1. As part of the wider submission of representations by Sandby (York) Ltd and Oakgate/Caddick Groups to the City of York preferred sites (2016) consultation, Understanding Data was commissioned to review the under-pinning GL Hearn 2016 SHMA, with particular focus on the demographic assumptions, the official projections starting point and market signals approach.

A2. This report focuses on areas of significant concern. Where no direct reference is made to the data or analysis drawn from this within the SHMA, this should not be taken as either indicating support or criticism unless directly stated.

A3. This report highlights areas of concern in the SHMA section 2, and provides an alternative approach in sections 3 and 4.

¹ https://www.york.gov.uk/downloads/file/10991/york_economic_strategy_2016_to_2020

1. Headlines

1.1 The GL Hearn analysis in the SHMA overstates the issue and influence of higher education (“HE”) students on demographic estimates and projections, and is not fully evidenced. Around 60% of the 18-24 cohort are HE students. The modelled increases (e.g. Sub-National Population Projections (“SNPP”) 2104) in these age groups are realistic, given the overall robustness of the HE sector, the further education (“FE”) sector and other educational opportunities and there does not seem to be clear reasons to ignore the SNPP 2014, especially with the availability of Sub-National Housing Projections (“SNHP”) 2014.

1.2 This age group plays a wider key role in economic terms to the ongoing well-being of York. They are a key component of the future workforce, in terms both of graduate retention, start-ups, the night time economy, and a range of other economic opportunities.

1.3 For the purposes of soundness, the City of York Council (the “Council”) need to update their evidence base with the latest SNHP2014, which show a significant increase in the annual rate compared to the 2012 set.

1.4 The latest mid-year population estimates 2015 are showing a return to higher levels of population change.

1.5 Economic forecasts data contained within the SHMA are out of date. It does not address the key relevant issues of the balance between jobs and workforce, or have a clear discussion around relevant changes likely to impact this balance based on assumptions around future levels of economic activity, unemployment and commuting. These factors should be addressed as a priority.

1.6 The provenance of the Oxford forecasts² in the SHMA against previously published versions is not clear and there is no discussion about wider economic trends.

1.7 The proposed response to acknowledged worsening trends in affordability and overcrowding is not justified or sound. There is clear steer from Development Plan examinations that a minimum of 10% market signals adjustment should be used.

1.8 The updated objectively assessed need (“OAN”) should be, as a minimum:

- 856 households per annum (SNHP 2014)
- 887 dwellings per annum (vacancy rate of 3.7%)
- 10% market signal adjustment (reflecting affordability issues)
- 976 dwelling per annum OAN

1.9 Furthermore, consideration should be given once the latest economic forecasts and analysis is undertaken as to whether a higher market signals adjustment is appropriate. At this stage, a 20% uplift would lead to an OAN figure of 1064 dwellings per annum. The LPEG guidance is that if the median house price to

² Presumably sourced from the May 2015 York Economic Forecasts but not explicitly referenced in the SHMA - <http://democracy.york.gov.uk/mgAi.aspx?ID=39287>

median earnings ratio falls between 7 and 8.7, a 20% uplift should be applied. The average over the last three years for York is 7.54, i.e. within this range.

1.10 For the purposes of this review of the current SHMA, it is considered the OAN for York, sits within the range:

976 to 1064 dws per annum.

1.11 For the purpose of soundness the Council need to address the 2014 SNPP and 2014 SNHP implications, and be much clearer about the plan's aspirations for economic growth. The detail of this relationship would influence whether the OAN should be at the lower or higher end of the range expressed above.

2. Review of the SHMA – GL Hearn June 2016 and Addendum

2.1 The Government's Planning Practice Guidance (PPG) stipulates that the starting point for estimating an OAN is the Department for Communities and Local Government ("DCLG")'s latest household projections. It acknowledges, however, that it may be necessary to adjust those projections to take account of factors that are not reflected in the trends on which they are based.

2.2 The DCLG released the SNHP 2014 on 12th July 2016. This provides a new trend-based projection of household formation across all local authorities in England.

2.3 It is anticipated that PPG will be updated imminently to confirm that this dataset represents a new 'starting point' when establishing the OAN for housing.

2.4 The new publication supersedes the 2012 SNHP which have been used as a demographic starting point for OAN since its release in March 2015.

2.5 The SHMA is the key evidence in the Council's Local Plan Preferred Sites (2016) document and states³:

"Taking account of more recent migration (Mid-Year Population Estimates 2013 and 2014 ONS) and improvements to household formation rates for younger households (25-34 year age group), the SHMA draws the conclusion on the overall full objectively assessed need for housing over the 2012 to 2032 period to be 841 dwellings per annum."

A. Assumptions around student numbers

2.7 The SHMA raise some concerns relating to historic growth within the student population and how this translates into SNPP projections. It argues that this causes particular concern in relation to the SNPP 2014 where there is relatively strong growth in some of the student age groups when compared to the previous 2012 projections.

2.8 GL Hearn focus on York University and St John York. There is no real discussion of FE within the area, or for example language schools and their implications of any expansion or growth in either of these sectors, or in employment rates and types of jobs, for younger people which are part of York's economic aspirations.

2.9 HE students at the two universities account for around 60% the 18-24 age cohort.

2.10 GL Hearn quote university literature in the SHMA⁴ and conclude that there are weaker prospects for future growth. This is used as a key reason in not adopting the SNPP 2014 as the basis for the assessment of housing need. This approach is not fully justified.

³ Page 7 of the Allocated Sites 2016 consultation document

⁴ Page 193-194 of the SHMA

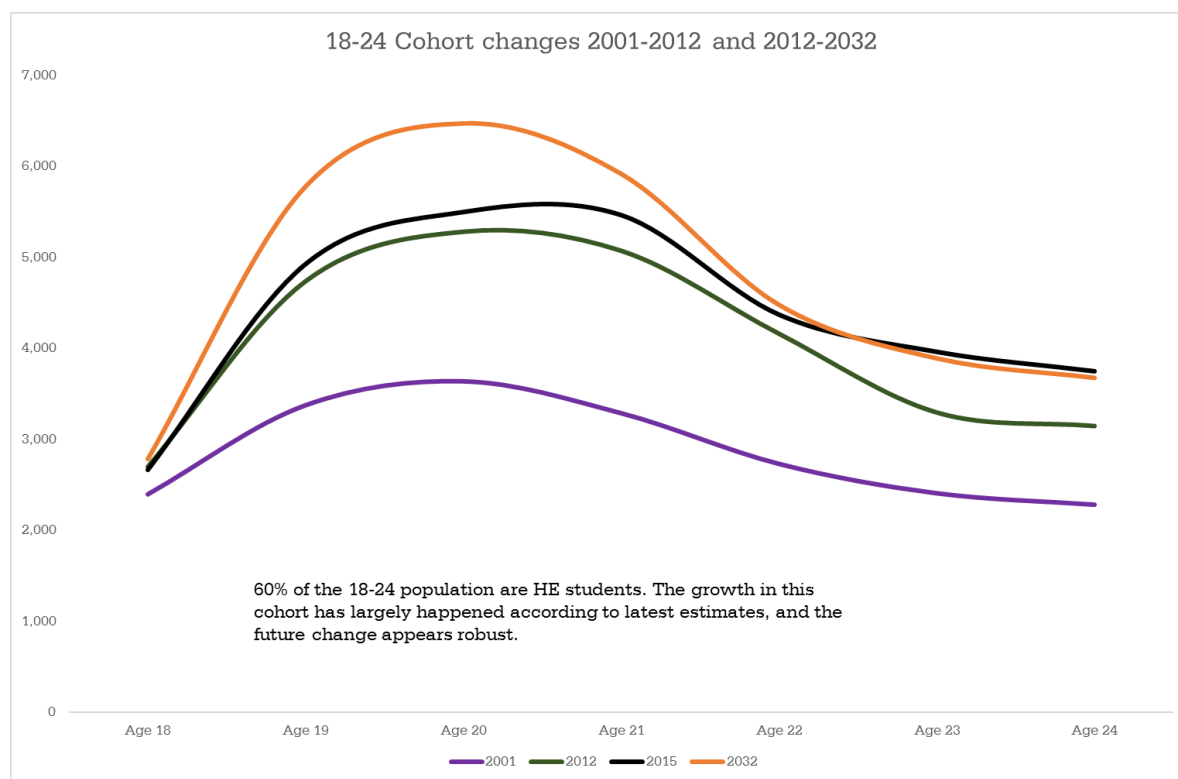
Comment

2.11 There is no assessment of growth in the FE sector or wider educational sector. There is no recognition of the need for a growing economy to have a young and active workforce component.

2.12 The GL Hearn analysis seems to assume all “younger people” are students, but focuses solely on HE. There are FE students, and of course people in the 18-24 age group not in education, who are potentially, and are part of the workforce.

2.13 Chart 1 shows changes in age groups linked to student age groups.

2.14 The 2014 SNPP shows growth in this age group, but is realistic in its scale compared to the change experienced since 2001.



Note: The purple line to green line shows the strong growth in 18-24 yr. olds in York 2001-2012. The black line to orange line shows the more modest growth anticipated in this cohort from 2015-2032.

A. 2012 vs 2014 household projections

2.15 Following on from the publication of the SNPP 2014, DCLG published the SNHP 2014 in July 2016.

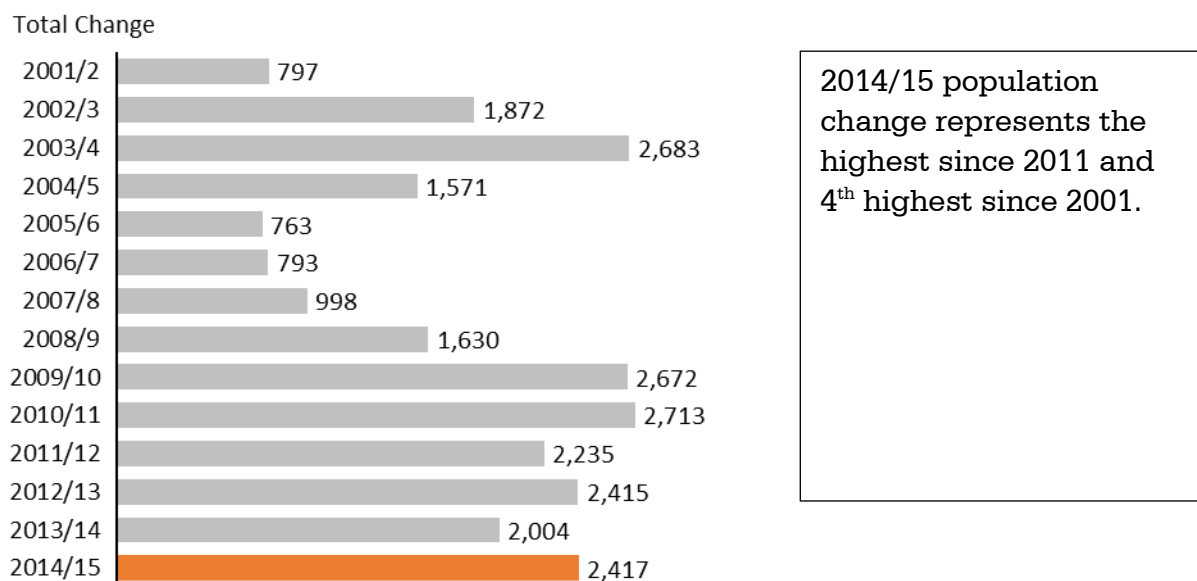
2.16 This publication supersedes the 2012 SNHP which have been used as a demographic starting point for OAN since its release in 2015.

2.17 The projected level of housing need is comparable with that projected in the previous 2012 SNHP, when comparing the respective 25 year projections periods. However, assuming a 2012 base date for both projections to enable a more direct comparison confirms that the new dataset indicates a higher level of household growth at a national level, and across many local authorities including York⁵.

2.18 In addition to this important release there has also been a further mid-year population estimate for 2015 from the Office for National Statistics (“ONS”).

2.19 2014/15 ONS estimates of population show a return to previous high levels of overall change for York as highlighted below.

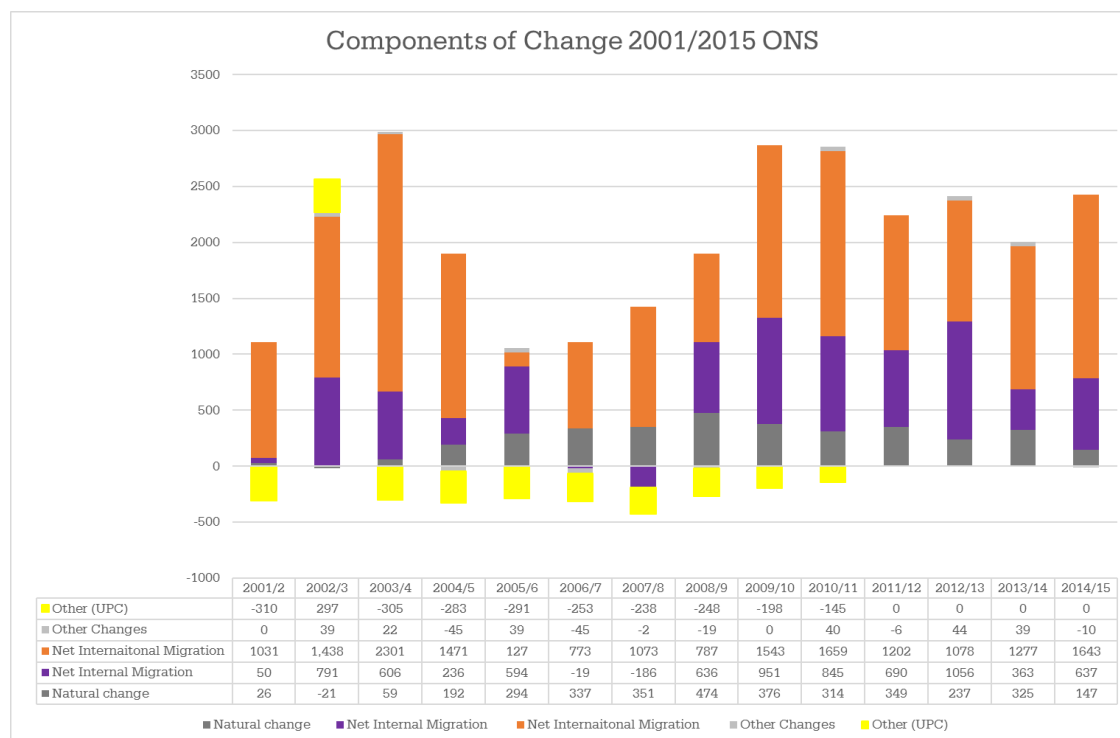
Chart 2 Updated Mid-year estimates total population change



2.20 This release also gives the latest data on natural change and migration.

⁵ 2014 based SNHP results for York are set out in section 3.

Chart 3 Components of Change 2001-2015



Trend and Notes:

For 2014/15 net internal and net international migration have both increased when set against recent years, and mark a return to the higher levels of growth experienced between 2009-11. There is not likely to be any significant short term changes to these levels, in particular international migration, and as yet the timescales, let alone the impact of Brexit, are unknown.

Comment

2.21 The SNPP 2014 and SNHP 2014 updated new population and household projections create a clear need to refresh the starting point for the purposes of assessing housing need and is necessary to ensure the forthcoming Local Plan is founded on sound evidence. The SHMA somewhat dismisses the weight to be given to the SNPP 2014, and attempts to model the new household projections. However, the results of the SNHP 2014 are relevant and clearly mark a higher expectation of household formation. Taken alongside the latest population estimates, it is clear that the experience and the projection are for greater population and household growth to occur in York.

B. Economic Balance approach

2.22 GL Hearn report on a series of (4) economic forecasts. Paragraph 5.3 (of the SHMA) sets these out as:

- Oxford Econometrics (“OE”)1 (baseline),
- OE 2 (higher migration)
- OE 3 (re-profiling) and

- A forecast from Experian via Yorkshire and Humberside Regional Economic Model (YHREM) dated Dec 2014.

2.23 The OE forecasts are not dated, but appear to be continuations and updates of forecasts previously considered by the 2014 Ove Arup report “City of York Council, Housing Requirements in York - Evidence on Housing Requirements in York: 2014 Update”. In this report the OE forecasts are referenced as updates to forecasts that appeared in the 2013 Ove Arup report of the same name.

Comment

2.24 There is a clear need to:

- Identify and use the latest available economic forecasts. The latest release of the YHREM is June 2016 and a post Brexit release is expected. It is not clear what the relationships are with the OE forecasts previously reported by Ove Arup and those in the SHMA – are they updates and if so what are the changed assumptions that leads to the forecasts that GL Hearn quote being significantly lower than the 2014 Over Arup versions.
- This leads to an equally significant issue. There is a lack of discussion about the key issue that the SHMA acknowledges, but does not then address, which is the balance between jobs and the likely change across the plan period of the workforce (or working age population). This is tied up in the application of commuting, economic activity rates and unemployment rate assumptions, which should be transparently published and available for both scrutiny and challenge.
- GL Hearn do not publish detail of the assumptions behind the economic forecast, or clearly set out what this means for jobs. They do not unravel the working age balance, or set out the relationship of the economic forecasts with the SNPP, but go on to conclude that there is a balance between likely jobs growth and “population” growth, the comparison should be between job growth and working age population.

C. Affordability and Market Signals

2.25 In paragraph 8.99 of the SHMA, GL Hearn conclude:

“Overall the analysis of market signals clearly points towards some affordability pressures, with lower quartile to median income ratio around 7.89 in York; this is much more than the results at the national level (6.45 in England). It would therefore be appropriate to consider a modest upward adjustment to the demographic assessment of housing need to improve affordability over time, in line with the approach outlined in the Practice Guidance.”

2.26 There is no justification given for why the adjustment should be modest.

2.27 The proposed solution to this acknowledged issue is to respond to market signals through an adjustment, which in essence models a return to higher levels of household formation for the 25-34 age group. This is set out in the SHMA at section 8.104-8.117.

2.28 The impact of this proposed uplift is an additional 8 dwellings a year.

2.29 Modelling different household formation rates is normally a sensitivity test within more sophisticated demographic models than the approach applied here by GL Hearn.

2.30 Affordability pressures are whole market, and the solution to them is not in terms of adjustments based on a modelled outcome for a single age group.

2.31 GL Hearn quote some local plan examination Inspector findings that do not apply an uplift⁶. Their use of the Cornwall example is misleading, The Inspector recommend a proxy market signal adjustment of 7% (at the end of OAN process) and it was within this context that he did not recommend further market signals adjustment.

2.32 Overall GL Hearn consider York has market signal issues with house prices, affordability and overcrowding. The response to this is indeed a modest one, suggesting only 8 dwellings a year upwards adjustment. Section 4 of this report sets out an alternative Local Plan Expert Group (“LPEG”) consistent approach.

⁶ Page 154 of the SHMA

3. An Alternative and updated OAN starting point

2014 SNHP Household change

3.1 GL Hearn assessment concludes that the likely realistic dwelling target of the OAN is 841, which is linked to the scenario 2012-based SNPP (updated) set out below, which is GL Hearn's attempt to merge 2012 SNHP / SNPP with ONS mid-year population estimates from 2013 and 2014:

Table 1 2016 GL Hearn SHMA and Addendum summary of the starting point

	Households 2012	Households 2032	Change 2012-2032	HH Per annum	Dwellings (vacancy rate)
2012-based SNPP	82244	99338	15093	755	783
2012-based SNPP (hybrid)	84244	100,300	16,056	803	833
2014 based (GLH derived)	82,244	102,702	18,458	923	958

3.2 The SNHP 2014 are the latest available projections and show a clearly increased expectation around household change for York. This is 101 households more a year than the SNHP 2012 and 53 households more a year than the GL Hearn hybrid referred to above.

Table 2 SNHP 2014 data

	Households 2012	Households 2032	Change 2012-2032	HH Per annum	Dwellings (vacancy rate)
2014-based SNPP	84271	101389	17118	856	887*

*an addition of 31 from the vacancy conversion – see below.

3.3 This is the starting point for any assessment of OAN. In order to ensure the forthcoming Local Plan is based on sound and objective housing needs evidence, the Council should consider a focused update which uses this base as the starting point for their assessment of a likely housing target.

3.4 It is helpful to explain how the vacancy adjustment is achieved in the normal OAN process. It is used as a proxy to convert the households change estimate into the starting point expressed as dwellings. The SHMA expresses the vacancy rate as 3.8% (para 4.72).

3.5 The 2011 Census Table QS417EW gives the following “vacancy rate” of 3.7% for York. This is applied to the household figure(s) above to proxy a dwelling starting point.

3.6 The vacancy adjusted starting point is, therefore, 887 dwellings a year.

4. Adjusting the starting point - affordability/market signals

Affordability

4.1 The SHMA analysis highlighted clear issues of affordability (as well as overcrowding, and in regional terms house price). This is acknowledged by the Council in various documents, including the Economic Strategy 2016-2020.

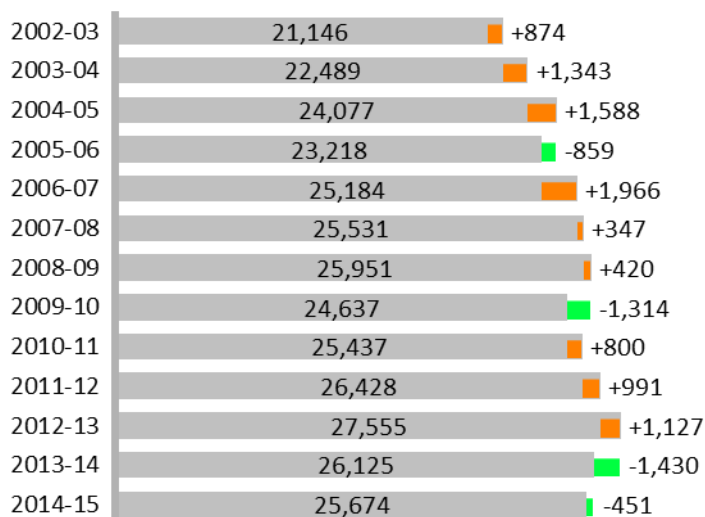
4.2 For the purposes of this report additional analysis has been undertaken which illustrates a clear shift in house price sales within York, which in terms of earnings levels which have broadly remained static and continue to lag behind median levels, clearly illustrate the need for a more market signal response.

4.3 The house price data is sourced from price paid datasets published by the Land Registry⁷ and covers over 18,000 sales from 2011 to June 2016.

4.4 Earnings data is also presented to highlight the median earnings as published by Nomisweb⁸. It is useful to consider this first.

4.5 Looking at this highlights year to year change

Chart 4 Earnings Data from 2002 to 2015.



Note:

The grey bar represents the final year of the comparison (so in the last row 2015) and the green section shows a decline from the corresponding start year of the row (2014). The orange highlight shows an increase across the two years (e.g. 2012-13).

⁷ <https://www.gov.uk/government/collections/price-paid-data>

⁸ <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=30>

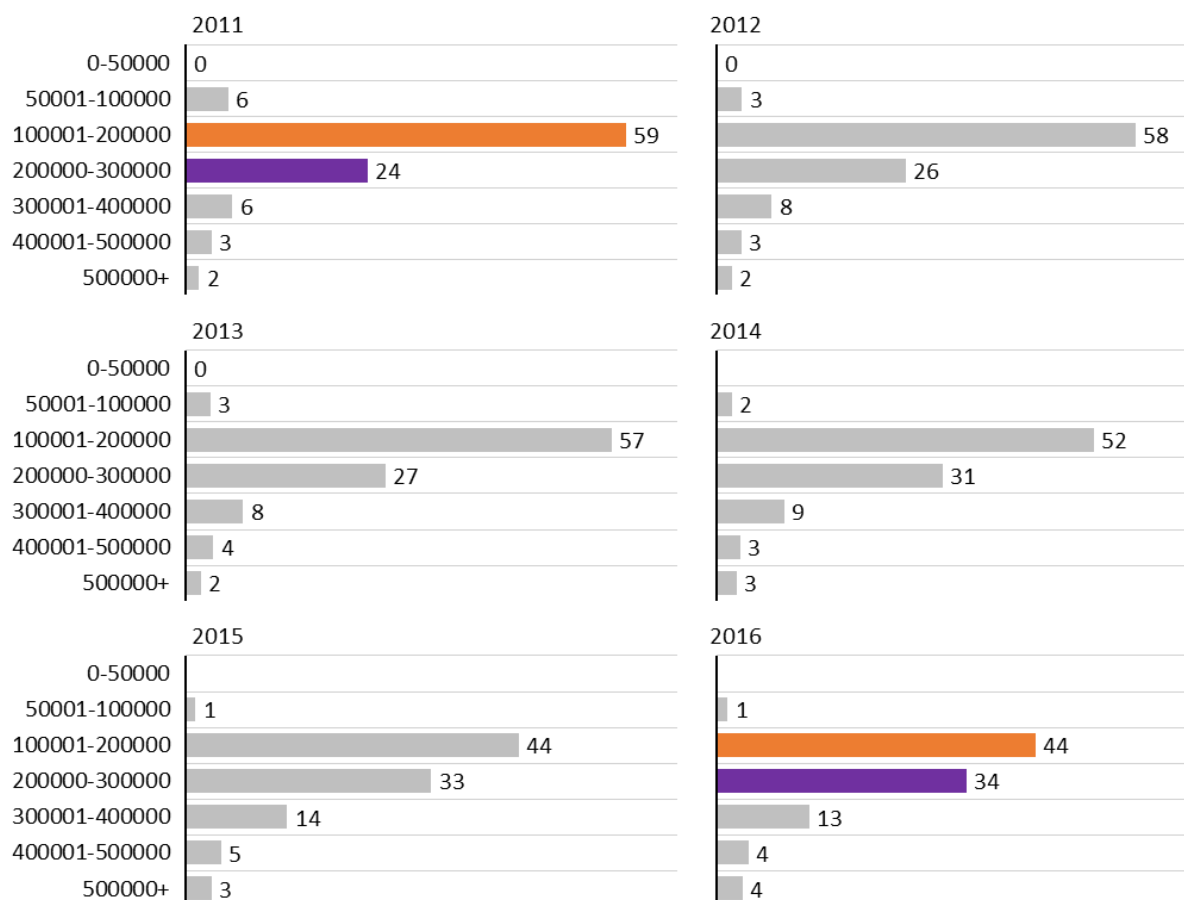
Key issues

4.6 Earnings have been broadly static from 2006-2011 with levels rising slightly in 2012/2013, but falling again by 2015.

4.7 In this context, detailed data is available about house price sales. Data has been analysed from 2011 – 2016, where earnings have been broadly constant across this period.

4.8 This shows a strong shift away from the availability of “cheaper properties” and an increase in the percentage of sales of more expensive properties.

Chart 5 House price distribution



4.9 In 2011 59% of sales were between £100,001 and 200,000.

4.10 By 2015 this had fallen to 44%. This is a clear signal of a worsening trend, especially in a City where earnings have largely remained unchanged over the period.

4.11 This simple and easily available data, alongside the earnings data, shows that affordability is a significantly worsening issue for York, that a “modest” adjustment of an extra 8 dwellings a year is unlikely to address.

4.12 The LPEG⁹ advises that there should be a clear separation of market signals adjustment to any treatment of modelling or adjusting for household formation rates change. The Council will need to take a view on the robustness of this advice, with regard to their own evidence base.

4.13 It seems a fairly conservative response to the affordability issues facing York, alongside the accepted worsening of overcrowding experienced between 2001 and 2011 and the increase in private renting, to make a more significant market signals adjustment.

4.14 The 10% uplift which is fairly standard across the country for areas with clear affordability issues is therefore a minimum.

Economic Balance

4.15 GL Hearn conclude in para 5.9 of the SHMA

“Overall, whilst it would be possible to do additional modelling to estimate what level of housing might be needed when set against the forecasts it is not considered that this would be an appropriate approach in the case of York. The population estimates from each of the scenarios are very similar and in all cases support a level of population growth which is only marginally above the level shown in the most recent ‘official’ population projections.”

4.16 However, it is exactly this issue that the Planning Advisory Service (“PAS”) guidance addresses.

4.17 The July 2015 PAS Technical Advice Note Objectively Assessed Need and Housing Targets, stated that using economic forecasts is flawed because they already include a view of the future population. In essence population is both an input and an output. Some models assume that population will change in line with the official prevailing SNPP forecasts and hold future employment growth constant to that supply constrained level. Others use population growth as an output, derived partly from the demand for labour where more job opportunities attract more migrants.

4.18 The March 2016 report by the LPEG to the DCLG Secretary and to the Minister of Planning recommended a new approach to assessing OAN, which stated:

“... in the interests of streamlining the process, removes the current requirement to consider an alignment of housing need with employment forecasts... We consider the purpose of this step of the current guidance can be more easily achieved by recognising that employment growth pressure is also likely to be reflected in local affordability issues, so that an appropriate adjustment of market signals would meet this purpose.”

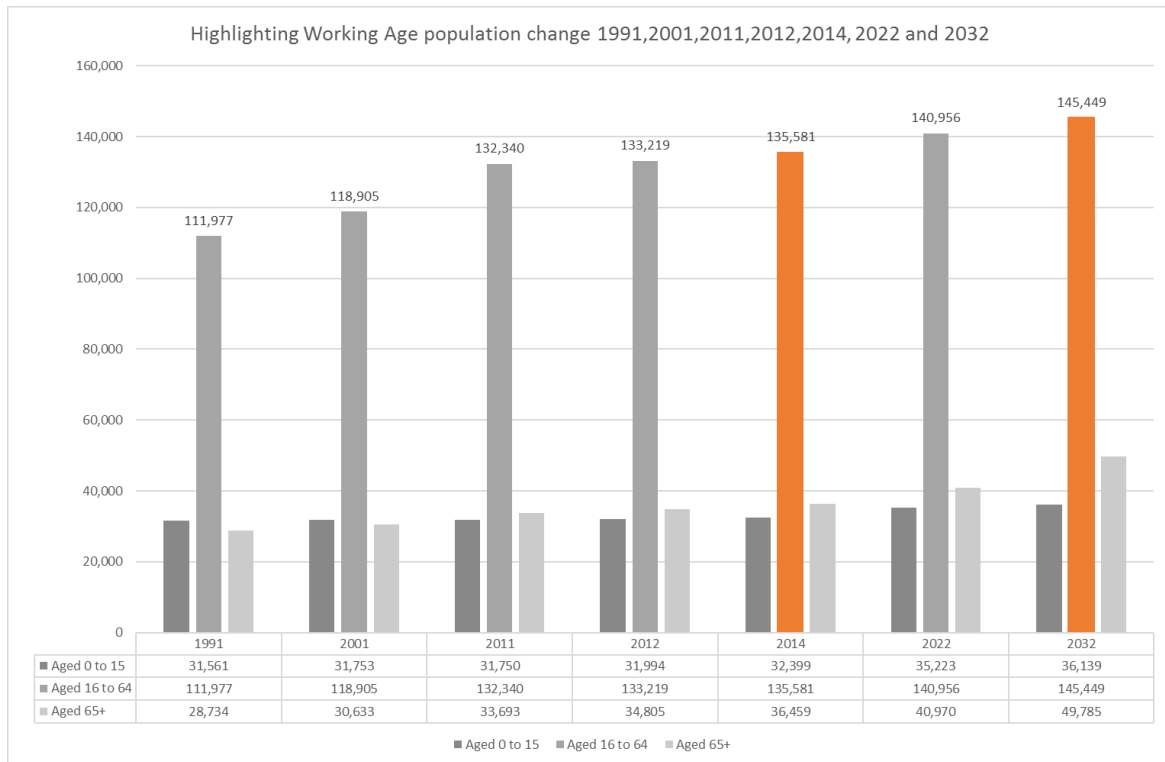
4.19 GL Hearn do not publish detail of the assumptions behind the economic forecast, or clearly set out what this means for jobs.

⁹ March 2016 report <http://lpeg.org/>

4.20 What is critically missing is a detailed assessment of the likely make up of the future York workforce, and whether this is sufficient to fill the likely job growth.

4.21 As elsewhere the population of York is ageing. The SNPP 2014 shows population growth and the changing age structure as:

Chart 6 Working Age Population changes



Note: Not all working age people are economically active, and every area has a flow of people who work outside the area they live, or live outside the study area but work within it.

4.22 It is these factors that should be considered alongside projected population change and job creation. There appears on the basis of the 2014 SNPP to be a risk of an imbalance to within the population to support the economic aspirations of the Council.

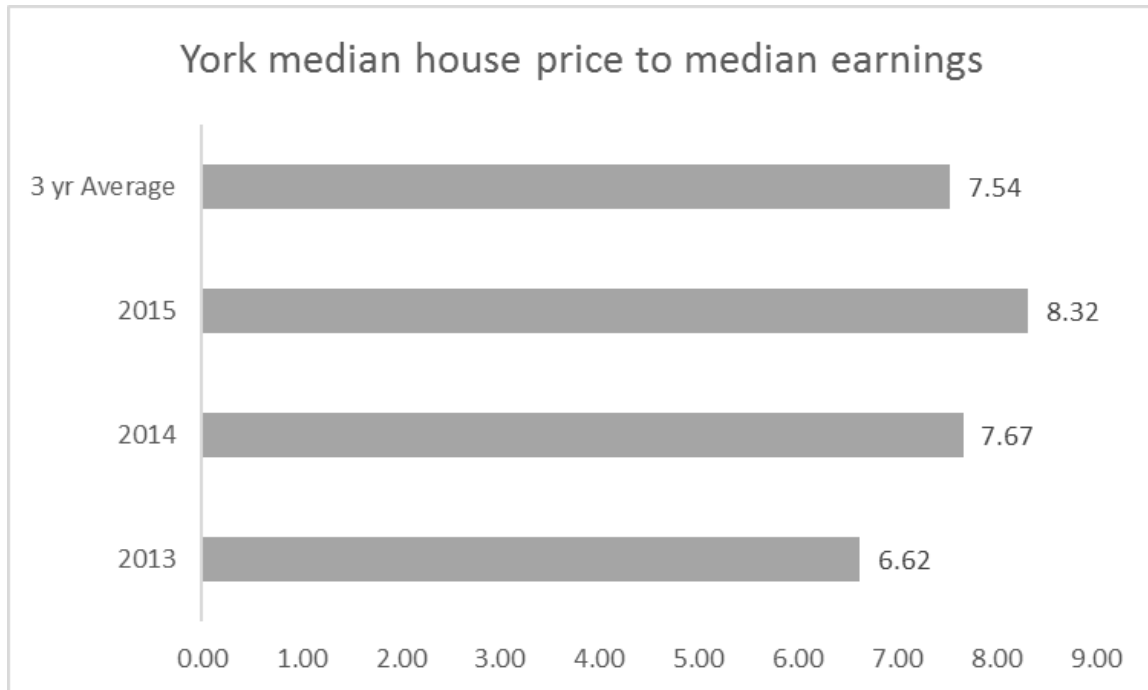
4.23 However, the current direction of travel as set out by the LPEG report is that rather through separate adjustments to balance jobs and workforce, it is appropriate to do this through the wider market signal adjustment.

4.24 This could create pressure that would be better reflected by a 20% market signal adjustment, although the detail of this is dependent on a more transparent release of both the latest economic forecast data and assumptions. This is a key area that the Council need to address in commissioning a further review of the published SHMA work.

4.25 The LPEG guidance is that:

“Where the House Price Ratio (HPR) is at or above 7.0 and less than 8.7 ... a 20% uplift should be applied...”

Chart 7 LPEG House Price Ratio for York



Note:

Higher numbers are showing worse affordability, and the last three years have seen an increase in the ratio.

4.26 Some caution is merited. The LPEG guidance is not yet certain, and the direction of travel of their intentions and the simplicity of the criteria are sure to create further debate.

4.27 However, it is clear that York faces a significant affordability issue, and that the economic balance is uncertain from the available data and discussion in the SHMA. It is prudent to express the OAN as a range, covering a minimum 10% uplift, but also the implied LPEG 20%.

Concluding thoughts

4.28 This review highlights areas that the Council need to address within their current evidence base. It shows that through the introduction of the latest 2014 SNHP evidence, and through the application of reasonable and evidenced adjustments (10-20%) to an acknowledged affordability issue, (which is worsening) the OAN range is 976-1064 dws per annum. This is significantly higher than the preferred SHMA option of 841 dws per annum

Understanding Data 08.09.2016v4

From: jadu-www@rsvm121.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 04 April 2018 17:42
To: localplan@york.gov.uk
Subject: A new Local Plan Publication Draft response form has been submitted

A new Local Plan Publication Draft response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

Web ref: 105182

Date submitted: 04/04/2018

Time submitted: 17:41:44

Thank you for submitting your Local Plan Publication Draft response form (ref: 105182, on 04/04/2018 at 17:41:44) to City of York Council.

The following is a copy of the details you included.

About your comments

Whose views on the Local Plan publication draft do your comments represent? Own comments

About you/the organisation/individual/group you're representing

Please complete in full; in order for the Inspector to consider your representations names and postal addresses must be provided.

Title: Mr

Forename: Colin

Surname: Packer

Name of the organisation/individual/group you're representing:

Address (building name/number and street): [REDACTED]

Address (area): [REDACTED]

Address (town): [REDACTED]

Postcode: [REDACTED]

Email address: [REDACTED]

Telephone number: [REDACTED]

What are your comments about

You may complete this form more than once - you should **submit a separate form for each issue to you want to raise** relating to the Local Plan 'publication draft', the Policies Map or the Sustainability Appraisal/Strategic Environmental Assessment.

Which document do your comments relate to? Local Plan Publication Draft

Legal compliance of the document

'Legally compliant' means asking whether or not the plan has been prepared in line with statutory regulations, the duty to cooperate, and legal procedural requirements such as the Sustainability Appraisal. Details of how the plan has been prepared are set out in the Consultation Statements and Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan.

Do you consider the document is legally compliant? No, I do not consider the document to be legally compliant

Do you consider the document to comply with the Duty to Cooperate? NoCompliestoDuty

Please justify why you do/do not consider the document to be legally compliant or in compliance with the Duty to Cooperate:

It is probably fine but I don't have the technical knowledge to definitively say so, so have to default to "No"

Whether the document is/is not 'sound'

Deciding whether you consider the document to be 'sound' means considering whether it's 'fit for purpose' and 'showing good judgement'. The inspector will use the public examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness':

- **positively prepared** - prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from

neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development

- **justified** –the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- **effective** – deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- **consistent with national policy** – enables the delivery of sustainable development in accordance with the policies in the framework

Do you consider the document to be 'sound'? Yes, I consider the document to be sound

Please indicate which of four 'tests of soundness' relate to your answer:

[Response - SoundnessYES]

Please give reasons for your answer(s):

Other than my points that follow, the document seems broadly "sound" to my untutored eye

Which part of the document do your comments on 'soundness' relate to? Please provide a paragraph number, a policy reference or a site reference: 2018 Proposal map South is my main area of interest

Necessary changes

You can suggest any change(s) you consider necessary to make the Local Plan legally compliant or sound - you'll need to say why the modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Your suggestion should cover succinctly all the information, evidence and supporting information necessary to support/justify it. There will not normally be a subsequent opportunity to make further representations; these would only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

Edge of the greenbelt. This is significant for my own home, as we do not wish to find that some of our land has accidentally become Green belt when it wasn't before. It looks like greenbelt goes to middle of the grey line on the plan. If so, then this looks ok.

The items below may already be covered in the Plan but if not, or if will follow later, I suggest the following should be incorporated in the plan to help make it work effectively for the local community.

1. Steps should be taken to make the B1228 (Elvington Lane) safer.
 - a. Prohibit heavy vehicles travelling through the village of Elvington and over Sutton bridge. Currently the village is becoming progressively more dangerous for everyone and, significantly, for children travelling to school
 - b. Heavy traffic from the Elvington Airfield site to be directed towards the A64 and not towards Elvington
 - c. A roundabout will ease access at the Airfield junction once commercial vehicle volume grow under the Plan
 - d. Traffic from the proposed ST15 development should not be linked via the B1228 but should

have a direct route to York. If it does link to B1228 then a ban on heavy vehicles through the village is all the more essential

2. The B1228 is too dangerous for cyclists. To encourage safe cycling (commuter and leisure) a cycle route should be created from Elvington to York, perhaps via the ST15 development. This should be planned now and created as soon as possible

3. The ST15 development should not extend further towards Elvington and a substantial green space should be maintained between the two villages to protect/establish historic identities.

If you're seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination? No hearing sessions

If you select 'No', your suggestions will still be considered by the independent planning inspector by way of written representations.

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt, to hear those who want to participate at the hearing sessions.

From: Lucy Bullock [lucy.bullock@lichfields.uk]
Sent: 04 April 2018 17:38
To: localplan@york.gov.uk
Cc: Anna Turton
Subject: Representations on behalf of Hungate (York) Regeneration Limited on the York Publication Draft Local Plan [NLP-DMS.FID457559]
Attachments: 50370_05 Hungate York Regeneration Limited Publication Draft Local Plan Consultation Response Form 0.PDF; 50370_05 Hungate York Regeneration Limited - Representations on Publication Draft Local Plan 04.04.1.PDF

Dear Sir/Madam,

Please find enclosed our representations on behalf of Hungate (York) Regeneration Limited on the Publication Draft Local Plan.

We can confirm our client's agreement for these representations to be used in accordance with the Council's Data Protection Policy.

We would also appreciate notifications on the progress on the Local Plan.

Please do not hesitate to get in touch should you require any further information.

Kind regards

Lucy

Lucy Bullock
Planner

Lichfields, 3rd Floor, 15 St Paul's Street, Leeds LS1 2JG
 T 0113 397 1397 / M 07880382563 / E lucy.bullock@lichfields.uk

lichfields.uk  



**Draft revised NPPF:
workable solutions
for meeting housing
need?**

VIEW INSIGHT

Insight focus
 Draft revised National Planning Policy Framework
 Published this month, the Draft revised National Planning Policy Framework (NPPF) provides a clear and concise guide to the latest government policy on housing and planning. It includes a new chapter on housing and a new chapter on the planning system. The NPPF is a key document for all those involved in the planning process, including developers, local authorities, and the public. It sets out the government's vision for the future of the planning system and provides a clear framework for decision-making. The NPPF is a key document for all those involved in the planning process, including developers, local authorities, and the public. It sets out the government's vision for the future of the planning system and provides a clear framework for decision-making.

This email is for the use of the addressee. It may contain information which is confidential and exempt from disclosure. If you are not the intended recipient you must not copy, distribute or disseminate this email or attachments to anyone other than the addressee. If you receive this communication in error please advise us by telephone as soon as possible.
 Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.

 **Think of the environment. Please avoid printing this email unnecessarily.**

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mrs
First Name		Anna
Last Name		Turton
Organisation (where relevant)		Lichfields
Representing (if applicable)		Hungate (York) Regeneration Limited
Address – line 1		Lichfields
Address – line 2		15 St Pauls Street
Address – line 3		Leeds
Address – line 4		
Address – line 5		
Postcode		LS1 2JG
E-mail Address		anna.turton@lichfields.uk
Telephone Number		0113 397 1397

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

- Online via our website www.york.gov.uk/localplan.
- City of York Council West Offices
- In all libraries in York.

Part B - Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please see attached representations.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

5.(1) Do you consider the document is Sound?Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)Positively prepared Justified Effective Consistent with national policy **5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?**

(Complete any that apply)

Paragraph
no.Policy
Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Please see attached representations.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I wish to appear at the examination in order to discuss our recommended changes in order to ensure the plan is sound and also to represent Hungate (York) Regeneration Limited's interests.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature




Date

04/04/2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

FREEPOST RTEG-TYYU-KLTZ Local Plan,
City of York Council,
West Offices,
Station Rise,
York,
YO1 6GA

BY EMAIL ONLY (localplan@york.gov.uk)

Date: 4 April 2018

Our ref: 50370/05/SSL/LBu/15686858v1

Your ref:

Dear Sir / Madam,

City of York Local Plan: Publication Draft Representations on behalf of Hungate (York) Regeneration Limited

On behalf of our client, Hungate (York) Regeneration Limited, Lichfields submit representations to the City of York Local Plan Publication Draft. These representations are submitted in the context of Hungate (York) Regeneration Limited's interest in York, namely the Hungate development site and their general support for increased provision of new homes and higher density development within the City in line with national policy guidance and the draft revised National Planning Policy Framework. These representations build upon earlier representations submitted by Lichfields on behalf of Hungate (York) Regeneration Limited during the consultation on the Pre-publication Draft.

Hungate (York) Regeneration Limited

Hungate (York) Regeneration Limited is a joint venture between Lend Lease and Evans Property Group.

Since its establishment, Hungate (York) Regeneration Limited has developed and sold 168 residential units under Phase 1 (Blocks A, B and C), and an additional 195 residential units plus 55.7 sqm of commercial floorspace within Block E. These initial phases have improved significantly the type and range of residential properties available within York city centre, and delivered a number of important public realm and connectivity improvements, and contributed to the York economy through direct and indirect investment.

The Council granted planning permission in 2017 (ref. 17/02019/OUTM) for the remaining phases (blocks D, F, G and H) of the development via a new hybrid (part detail and part outline) planning permission which will result in the total development of up to 1,025 new residential units and a minimum of 1,265 sqm commercial floorspace, in addition to new community facilities, parking and public open space. The development of Block F has commenced and the development of Block G will commence shortly.

Hungate (York) Regeneration Limited are therefore playing a very significant role in delivering high quality new homes within the City and they hope to continue to have an active role in delivering more homes in the future.

National Planning Policy Context and Tests of Soundness

The core objective of the National Planning Policy Framework (NPPF) is to achieve sustainable development and promote growth; particularly in relation to the need to deliver a wide choice of quality homes. NPPF paragraph 14 emphasises the requirement for Local Plans to meet the objectively assessed needs of an area and the draft revised NPPF¹ makes clear that these should be taken as minimum levels of development.

In relation to plan making, NPPF paragraph 151 indicates that Local Plans must be consistent with the NPPF and should contribute to the achievement of sustainable development. Local Plans should set out the opportunities for development and provide clear policies on what will and will not be permitted and where.

It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is 'sound', as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to a number of matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the NPPF and the National Planning Practice Guidance (PPG).

The Publication Draft York Local Plan is due to be submitted for assessment to the Planning Inspectorate in May 2018 and will be examined by an independent inspector who will assess whether it has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements and whether it is 'sound'.

There is no statutory definition of 'soundness', however NPPF paragraph 182 establishes that in order to be 'sound', a Local Plan should be:

- 1 **Positively Prepared:** The Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- 2 **Justified:** The Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
- 3 **Effective:** The Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.
- 4 **Consistent with National Policy:** The Plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

These representations therefore consider the content of the Publication Draft York Local Plan on behalf of Hungate (York) Regeneration Limited in light of this planning policy context.

Response to the Publication Draft York Local Plan

As is set out in our previous representations, Hungate (York) Regeneration Limited support the allocation of major strategic sites to deliver substantial numbers of new housing in sustainable locations across York. Hungate (York) Regeneration Limited specifically support the regeneration of accessibly located brownfield sites within urban areas for the delivery of housing. This contributes towards making the most efficient use of land, which is one of the core planning principles as set out in paragraph 17 of the NPPF. This includes strategic sites such as ST32: Hungate and ST5: York Central, both of which are brownfield sites and occupy

¹ Published for consultation in March 2018

sustainable, city centre locations. Hungate (York) Regeneration Limited consider that these sites can support substantial levels of development and an appropriate mix of uses including many new homes.

However, Hungate (York) Regeneration Limited considers that some elements of the Publication Draft York Local Plan, as currently worded, fail to meet the tests of soundness. Set out below are responses to the relevant sections of the Publication Draft Local Plan in respect of Hungate (York) Regeneration Limited's interest in the Hungate development site.

Policy SS3: York City Centre

Policy SS3 sets out the range of development which is considered to be acceptable in principle within the city centre; and the strategic allocations within the city centre.

Hungate (York) Regeneration Limited generally agrees with the principles for city centre development set out in Policy SS3. However, as is highlighted in their previous representations to the pre-publication draft, there should also be an emphasis on the scope of the city centre to deliver more new homes. Therefore, the reference to the capacity of the ST32: Hungate allocation to deliver 328 dwellings should not be taken as a definitive figure and the policy wording should be amended to allow flexibility to deliver more homes on this site where appropriate.

Additionally, the current wording of policy SS3 implies that the total capacity of the ST32: Hungate allocation (as shown on the Proposals Map) is 328 dwellings. However, this actually reflects the approximate number of dwellings to be delivered in Phases 5 + as set out in Policy SS17. It is also unclear which elements of the Hungate scheme the 328 dwellings / phase 5+ relate to or how this figure has been calculated. Further clarification on this matter is therefore required.

In its current form, this policy is not positively prepared, justified or consistent with national policy and is therefore unsound.

The Hungate development site is a brownfield site, centrally positioned in a highly sustainable city centre location where increased housing should and could be delivered, particularly within the context of the national and local need to significantly boost housing growth.

The proposal to restrict housing numbers on the site to a maximum of 328 is therefore not the most appropriate strategy when alternative, higher density, proposals may be achievable (subject to other normal planning policy considerations). On this basis, the Plan, as currently worded, is not justified. Providing flexibility to achieve additional housing units on this site would help to boost the supply of housing within the area on a sustainable, brownfield, city centre site which would align with national planning policy and enable the delivery of sustainable development. This is a more appropriate strategy and provides the flexibility for densities to be increased where appropriate to help to meet the objectively assessed need for housing and ensure that the wider plan is effective and deliverable over the plan period.

Recommended Change

In order to ensure that the Plan is sound, it is recommended that:

- Policy SS3 is updated to clarify that 328 dwellings is not a definitive capacity figure for the Hungate site and to provide flexibility to increase unit numbers where appropriate in line with the site's brownfield nature and sustainable, city centre location where increased densities should be encouraged.
- Clarification is provided as to which elements of the Hungate scheme the 328 dwellings / phase 5+ relates to and how this figure has been calculated.

Unless these changes are made, the Plan would fail all four tests of soundness as set out in paragraph 182 of the NPPF.

Policy SS4: York Central

Hungate (York) Regeneration Limited supports the principles behind the York Central proposals that encourage high density mixed use development that respects the historic setting of the City. Therefore, the increase in dwelling numbers on the York Central site from 1,500 to 1,700 – 2,500 is supported.

Hungate (York) Regeneration Limited supports this increase in dwelling numbers on the York Central site as it is in a highly sustainable location. On this basis, the expected capacity of the Hungate site should also be increased to reflect existing and future permissions.

Policy SS17: Hungate

Hungate (York) Regeneration Limited supports the Council's continued allocation of the Hungate site as a strategic housing site and its ability to deliver at approximately 328 dwellings over the remaining phases. However, as is set out in relation to policy SS3 above:

- 1 There should be an emphasis on the scope of the city centre to deliver more new homes and the reference to the capacity of the ST32: Hungate allocation to deliver 328 dwellings should be amended to allow flexibility to deliver more homes on this site where appropriate.
- 2 It is not clear which elements of the Hungate scheme phase 5+ and the 328 dwellings relates to or how this figure has been calculated. Hungate (York) Regeneration Limited therefore requests further clarification on these matters to ensure that the policy wording is consistent with the consented and future proposals for the site.

Additionally, it is not necessary for the Plan to state that this '*must be delivered in accordance with the agreed site masterplan through existing outline and full planning consents*'. Not only is this unnecessary, but the Plan, by its nature, should be forward thinking and should incorporate flexibility to allow potential scope for change in the future to respond to changes in policy and circumstance. This is recognised in paragraph 5.4 of the draft Local Plan.

In its current form, this policy is not positively prepared, justified or consistent with national policy.

As is set out above, the Hungate development site is a brownfield site, centrally located in a highly sustainable city centre location where increased housing should and could be delivered, particularly within the context of the national and local need to significantly boost housing growth.

The proposal to restrict housing numbers on the site to a maximum of 328 is therefore not the most appropriate strategy when alternative, higher density, proposals may be achievable (subject to other normal planning policy considerations). On this basis, the Plan, as currently worded, is not justified. Providing flexibility to achieve additional housing units on this site would help to boost the supply of housing within the area on a sustainable, brownfield, city centre site which would align with national planning policy and enable the delivery of sustainable development. This is a more appropriate strategy and provides the flexibility for densities to be increased where appropriate to help to meet the objectively assessed need for housing and ensure that the wider plan is effective and deliverable over the plan period.

Recommended Change

In order to ensure that the Plan is sound, it is recommended that:

- Policy SS17 is updated to make clear that 328 dwellings is a minimum number

- Clarification is provided as to which elements of the Hungate scheme the 328 dwellings / phase 5+ relates to and how this figure has been calculated.
- The wording '*must be delivered in accordance with the agreed site masterplan through existing outline and full planning consents*' is omitted. Not only is this unnecessary, but the Plan, by its nature, should be forward thinking and should incorporate flexibility to allow potential scope for change in the future to respond to changes in policy and circumstance.

Unless these changes are made, the Plan would fail all four tests of soundness as set out in paragraph 182 of the NPPF.

Policy H1: Housing Allocations

Policy H1 identifies a number of allocations in order to meet the housing requirement set out in Policy SS1 'Delivering Sustainable Growth for York'. As discussed above, Hungate (York) Regeneration Limited supports the allocation of brownfield sites, including Hungate (ST32) and York Central (ST5), for the delivery of residential development in order to make efficient use of land and deliver regeneration. Major strategic sites can provide a significant source of housing as part of a wider mix of sites including smaller sites and increased density at such sites should be supported.

In line with the comments made in relation to policies SS3 and SS17 above, Hungate (York) Regeneration Limited requests clarification as to which elements of the Hungate scheme Phases 5+ and 328 dwellings refers to, to ensure that this is consistent with the consented and future proposals for this site.

For the reasons set out in relation to policies SS3 and SS17 above, Hungate (York) Regeneration Limited also requests that more emphasis is placed on the scope of the city centre to deliver more new homes and the reference to the capacity of the ST32: Hungate allocation to deliver 328 dwellings should be amended to allow flexibility to deliver more homes on this site where appropriate.

For the reasons set out in detail above in relation to policies SS3 and SS17, in its current form, this policy (and therefore the Plan) is not positively prepared, justified or consistent with national policy.

Recommended Change

In order to ensure that the Plan is sound, it is recommended that:

- The reference to the estimated yield for the Hungate site is updated to make clear that this is a minimum figure.

Unless this change is made, the Plan would fail all four tests of soundness as set out in paragraph 182 of the NPPF.

Policy H2: Density of Residential Development

Policy H2 identifies a range of net densities which housing developments will be expected to achieve including 100 units/ha within the city centre. The policy confirms that higher densities will also be supported within 400m of high frequency public transport corridors and where this complies with other plan objectives.

On strategic sites, the specific master planning agreements that provide density targets for that site may override the approach in this policy, which should be used as a general guide. Densities should be appropriate to the character of the surrounding area.

In relation to strategic sites, Hungate (York) Regeneration Limited agree that the densities set out within the policy should only be used as a general guide and that they should be considered on a 'site-by-site' basis. However, it should be recognised that higher densities would be appropriate in principle on brownfield city centre sites such as Hungate, in order to make efficient use of land and deliver much needed housing.

Recommended Change

In order to ensure that the Plan is sound, it is recommended that:

- Policy H2 should be more explicit in recognising that higher densities would be appropriate in principle on brownfield city centre sites such as Hungate, in order to make efficient use of land and deliver much needed housing.

This would ensure that the Plan is positively prepared in that it would contain sufficient flexibility to increase densities to provide additional housing on appropriate sites to meet objectively assessed needs. This would also ensure that the Plan is justified and effective in that it would allow a higher density strategy to be employed where appropriate to deliver housing over the plan period. This would also allow the delivery of sustainable development in line with national planning policy which encourages the most efficient use of land.

Policy H3: Balancing the Housing Market

Policy H3 requires proposals for housing development to balance the housing market by including a mix of types of housing which reflects the diverse mix of need across the city. This includes flats and smaller houses for those accessing the housing market for the first time, family housing of 2 to 3 beds and homes with features attractive to older people. The Council's aim of seeking to balance the housing market across the plan period and work towards a mix of housing identified in the Strategic Housing Market Housing Assessment (SHMA) is supported in principle. However, in order to ensure that the Plan is justified and effective over the plan period, this needs to recognise the scope for flexibility on a site by site basis.

Hungate (York) Regeneration Limited generally agrees with the need to deliver a mix of unit types and sizes and support the flexibility in Policy H3 to allow for an appropriate mix based on market requirements and local need at that time provide that flexibility in application is applied. Indeed, the 2016 SHMA notes that there is a geographical dimension and the specific mix of housing needed at a local level will be influenced in part by gaps in the existing housing offer locally.

Recommended Change

In order to ensure that the Plan is positively prepared, justified, effective and consistent with national policy, it is recommended that

- Policy H3 needs to recognise the scope for flexibility on a site by site basis.

Policy H4: Promoting Self and Custom House Building

Policy H4 requires that strategic sites above 5ha supply at least 5% of dwelling plots for sale to self-builders.

Hungate (York) Regeneration Limited supports the principle of planning for a range of housing types to meet identified need including demand for self-build plots. They agree that viability considerations and site-specific circumstances should be taken into account when determining the nature and scale of provision. However, it is important to recognise that onsite provision of plots for self and custom builders would not be appropriate on some sites such as apartment block developments in the city centre (i.e the Hungate development) and the policy needs to be amended to contain sufficient flexibility to reflect this.

As no changes have been made to the wording of this policy from the pre-Publication draft, these comments still stand.

In its current form, the policy (and therefore the Plan) is unsound. Due to the very nature of city centre apartment block developments, plots simply cannot be made available on-site for self and custom builders as part of such schemes. Relying upon 5% provision within such sites would not deliver sufficient plots to meet any objectively assessed need for self-builders. This is not therefore the most appropriate strategy for the Council to adopt and would not be effective in meeting the need within the Plan for self-builders. On this basis, the policy, as currently worded, is not positively prepared, justified or effective and would not deliver sustainable development consistent with national policy.

Recommended Change

In order to ensure that the Plan is sound, it is recommended that:

- The wording of policy H4 is amended to contain sufficient flexibility to reflect the fact that onsite provision of plots for self and custom builders would not be appropriate on some sites such as apartment block developments in the city centre i.e the Hungate development.

Unless this change is made, the Plan would fail all four tests of soundness as set out in paragraph 182 of the NPPF.

Policy H5: Gypsies and Travellers

Policy H5: Gypsies and Travellers requires strategic allocations to make provision for pitches onsite, on alternative land or to provide a commuted sum towards the development of pitches elsewhere. However, no detail is given on how the commuted sum would be calculated.

In its current form, the policy (and therefore the Plan) is unsound. As details are not provided as to how commuted sums for gypsy and traveller pitches will be calculated, the Council's requirements are not precise. Therefore, the Plan has not been positively prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements and the Plan cannot set the most appropriate strategy based on proportionate evidence as the requirements of developments are not known. Additionally, as development requirements are not known, the Plan cannot be effective as there cannot be confidence that the need for gypsy and traveller pitches can be met and delivered over the plan period. On this basis, the Plan cannot deliver sustainable development in line with national policy as standards are not set.

Recommended Change

In order to ensure that the Plan is sound, it is recommended that:

- Policy H5 is reworded to provide clarity on the method for calculating the commuted sum to satisfy these requirements, as this is not evident from the current wording.

Unless this change is made, it is considered that the Plan would fail all four tests of soundness set out in paragraph 182 of the NPPF.

Policy H9: Older Persons Specialist Housing

Policy H9 sets out that strategic sites (over 5ha) should incorporate the appropriate provision of accommodation types for older persons and for sheltered/extra care accommodations a mix of tenures will be supported.

Hungate (York) Regeneration Limited support the provision of an appropriate mix of housing including the potential provision for older persons accommodation where appropriate and particularly in accessible and central locations which are in close proximity to services and amenities. This must be applied flexibly, based on particular site characteristics.

Recommended Change

In order to ensure that the Plan is positively prepared, justified, effective and consistent with national policy, it is recommended that:

- Policy H3 needs to recognise the scope for flexibility on a site by site basis.

Policy H10: Affordable Housing

Policy H10 sets affordable housing contributions that are required for various site size thresholds.

The policy allows for open book appraisal to demonstrate that development would not be viable in instances where a developer believes the policy criteria cannot be fully met. Hungate (York) Regeneration Limited welcomes the inclusion of this mechanism which allows a discussion on viability to take place as this is critical to ensure the deliverability of developments to provide much needed new homes. The rigid application of an affordable housing requirement on each and every site will not enable such delivery.

Policy HW2: New Community Facilities

Policy HW2 suggests that applications for 'strategic residential developments' must be accompanied by an audit of existing community facilities and their current capacity. This should be prepared by the applicant. Developments that place additional demands on existing services will be required to provide proportionate new or expanded community facilities, to meet the needs of existing and future occupiers. On site provision or developer contributions will be sought to provide these additional facilities.

Hungate (York) Regeneration Limited does not support Policy HW2 in its current form. It is the Council's responsibility to provide the appropriate evidence base to justify any requirement for contributions sought and to ensure that the evidence is in accordance with the requirements of the Community Infrastructure Levy (CIL) regulations and that any contributions are directly related to the development and fairly and reasonably related to it in scale and kind and are necessary to make the development acceptable in planning terms (Reg.122). The Council would therefore need to demonstrate that these tests are met when providing any audit as a basis for seeking contributions.

Additionally, in order to provide certainty to applicants, the types of community facility to which the policy would apply should be identified within the policy. This would also help ensure that this Policy requirement does not cover the same facilities for which contributions are sought through other policies in the Publication Draft Local Plan.

Finally, wording needs to be built into the policy to ensure that the provision of new community facilities is subject to viability testing where relevant.

In its current form, the policy (and therefore the Plan) is unsound. As a comprehensive and up-to-date evidence base is not provided by the Council to demonstrate an objectively assessed need or justify the policy for additional community facilities, the Plan cannot be positively prepared or justified. Additionally, there cannot be confidence that the Plan will be effective in meeting the need for community facilities over the plan period. On this basis, the Plan cannot achieve sustainable development in line with national policy.

Recommended Change

In order to ensure that the Plan is sound, it is recommended that:

- Policy HW2 should be amended to reflect the fact that it is the Council's responsibility to provide the evidence to justify any requirements for contributions.
- In order to provide certainty to applicants, the types of community facility to which the policy would apply should be identified within the policy.
- The wording of policy HW2 is amended to allow flexibility for viability testing in appropriate circumstances.

Unless these changes are made, the Plan would fail all four tests of soundness as set out in paragraph 182 of the NPPF.

Policy HW3: Built Sports Facilities

The wording of Policy HW3: Built Sports Facilities requires developers to make a contribution towards new or expanded facilities however, no detail is provided on how this would be calculated. In addition, the wording of this policy has been revised to specify that *"For strategic sites facilities should be provided on-site, where possible."*

In its current form, the policy (and therefore the Plan) is unsound. As details are not provided as to how commuted sums for Built Sports Facilities are to be calculated, the Council's requirements are not precise. Therefore, the Plan has not been positively prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements and the Plan cannot set the most appropriate strategy based on proportionate evidence as the requirements of developments are not known. Additionally, as development requirements are not known, the Plan cannot be effective in meeting any need for built sports facilities over the plan period. On this basis, there cannot be confidence that sustainable development will be delivered in line with national policy as standards are not set.

Recommended Change

In order to ensure that the Plan is sound, it is recommended that:

- Policy HW3 should be reworded to provide clarity on the built sports facilities requirements that will be sought, as this is not evident from the current wording.

Unless this change is made, it is considered that the Plan would fail all four tests of soundness set out in paragraph 182 of the NPPF.

Policies HW4: Childcare Provision, HW5: Healthcare Facilities and D3: Cultural Provision

The wording of Policies HW4: Childcare Provision, HW5: Healthcare Facilities and D3: Cultural Provision also implies that it is the responsibility of developers to undertake an audit of existing facilities to determine whether additional provision is required.

For the reasons set out in relation to Policy HW2 above, Hungate (York) Regeneration Limited does not support Policies HW4, HW5 and D3 in their current form. It is the Council's responsibility to provide the appropriate evidence base to justify any requirement for contributions sought and to ensure that the evidence is in accordance with the requirements of the Community Infrastructure Levy (CIL) regulations and that any contributions are directly related to the development and fairly and reasonably related to it in scale and kind and are necessary to make the development acceptable in planning terms (Reg.122). The Council

would therefore need to demonstrate that these tests are met when providing any audit as a basis for seeking contributions.

In their current form, these policies (and therefore the Plan) are unsound. As a comprehensive and up-to-date evidence base is not provided by the Council to demonstrate an objectively assessed need or justify the policy for childcare provision, healthcare facilities and cultural provision, the Plan cannot be positively prepared or justified. Additionally, there cannot be confidence that the Plan will be effective in meeting the need for childcare, healthcare and cultural facilities over the plan period. On this basis, there cannot be certainty that sustainable development will be delivered in line with national policy.

The wording of Policy HW4 'Healthcare Facilities' has been amended slightly to allow some flexibility in relation to viability and Hungate (York) Regeneration Limited welcomes this amended wording albeit the overall concerns still remain. Similar wording also needs to be built into policies HW5 and HW6 to ensure that the provision of new healthcare and cultural facilities is subject to viability testing where relevant.

Recommended Change

In order to ensure that the Plan is sound, it is recommended that:

- Policy HW2 should be amended to reflect the fact that it is the Council's responsibility to provide the evidence to justify any requirements for contributions.
- In order to provide certainty to applicants, the types of community facility to which the policy would apply should be identified within the policy.
- The wording of policies HW5 and HW6 is amended to allow flexibility for viability testing in appropriate circumstances.

Unless these changes are made, the Plan would fail all four tests of soundness as set out in paragraph 182 of the NPPF.

Policy HW7: Healthy Places

The wording of policy HW7 has been amended from the pre-Publication draft to require all new strategic sites to complete a Health Impact Assessment (HIA) prior to the submission of a planning application.

Hungate (York) Regeneration Limited still considers that requiring all new strategic sites to undertake a HIA is an overly onerous requirement. Not all planning proposals will require a HIA, as this will depend on the type, scale and location of the development or proposal. In addition, the extent of the HIA undertaken will depend on the type and size of the project.

Additionally, the insertion of the word 'new' into the policy is also imprecise as it is unclear as to which strategic sites this relates to e.g. all strategic allocations made through the Local Plan or only those sites (or even phases of sites) upon which development has not commenced upon adoption. This revised policy wording therefore requires further clarification.

In its current form, the policy (and therefore the Plan) is unsound. Requiring the submission of a HIA on all new strategic sites cannot be justified as this is not based upon proportionate evidence and cannot therefore be the most appropriate strategy to adopt.

Recommended Change

In order to ensure that the Plan is sound, it is recommended that:

- The requirement to complete a Health Impact Assessment prior to submission of a planning application on all new strategic sites incorporates flexibility to assess whether this is necessary on a site by site basis.
- New strategic sites are defined

Unless these changes are made, it is considered that the Plan would fail the ‘justified’ test as set out in paragraph 182 of the NPPF.

Policy GI6: New Open Space Provision

Policy GI6 requires all residential development proposals to contribute to the provision of open space for recreation and amenity. It states that the precise type of on-site provision required will depend on the size and location of the proposal and the existing open space provision in the area. Where there are deficiencies in certain types of open space provision in the area surrounding a proposed development, the Council will seek variations in the component elements to be provided by the developer in order to help to overcome them. Requirements will be calculated using the Council’s up to date open space assessment and will be in line with the Council’s Green Infrastructure Strategy.

Hungate (York) Regeneration Limited welcomes the provision for flexibility within the policy in terms of off-site provision being acceptable in the circumstances identified. However, it was previously suggested that the policy should be reworded to provide clarity on the open space requirements that will be sought through the inclusion of open space standards within the policy wording, as this is not evident from the current use of statements such as “*the precise type of onsite provision required will depend on the size and location of the proposal*”.

As there has been no change to the wording of policy GI6, these comments still apply.

In its current form, the policy (and therefore the Plan) is unsound. As open space standards are not specified, the Council’s requirements are not precise. Therefore, there cannot be confidence that the Plan has been positively prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements or that the Plan sets the most appropriate strategy based on proportionate evidence as the requirements of developments are not known. Additionally, as development requirements are not known, the Plan cannot be effective in delivering open space over the plan period. On this basis, there cannot be certainty that sustainable development will be delivered in line with national policy as standards are not set.

Recommended Change

In order to ensure that the Plan is sound, it is recommended that:

- Policy GI6 is reworded to provide clarity on the open space requirements that will be sought through the inclusion of open space standards within the policy wording, as this is not evident from the current use of statements such as “the precise type of onsite provision required will depend on the size and location of the proposal”.

Unless this change is made, it is considered that the Plan would fail all four tests of soundness as set out in paragraph 182 of the NPPF.

Conclusion

Hungate (York) Regeneration Limited welcomes the opportunity to contribute to the Publication Draft York Local Plan and supports the allocation of major strategic sites to deliver substantial numbers of new housing in sustainable locations across York. Hungate (York) Regeneration Limited specifically support the

regeneration of accessibly located brownfield sites within urban areas for the delivery of housing. This contributes towards making the most efficient use of land, which is one of the core planning principles as set out in paragraph 17 of the NPPF. This includes strategic sites such as ST32: Hungate and ST5: York Central, both of which are brownfield sites and occupy sustainable, city centre locations. Hungate (York) Regeneration Limited consider that these sites can support substantial levels of development and an appropriate mix of uses including many new homes.

However, this representation has demonstrated that some elements of the Publication Draft York Local Plan, as currently drafted, fail to meet the tests of soundness and therefore, in its current form, the Plan is not legally compliant.

We trust that you will confirm that these representations are duly made and will give due consideration to our comments. Please do not hesitate to contact us to discuss any matters raised in this representation further.

Yours faithfully

A large black rectangular redaction box covering the signature area.

Associate Director

Copy- Hungate (York) Regeneration Limited

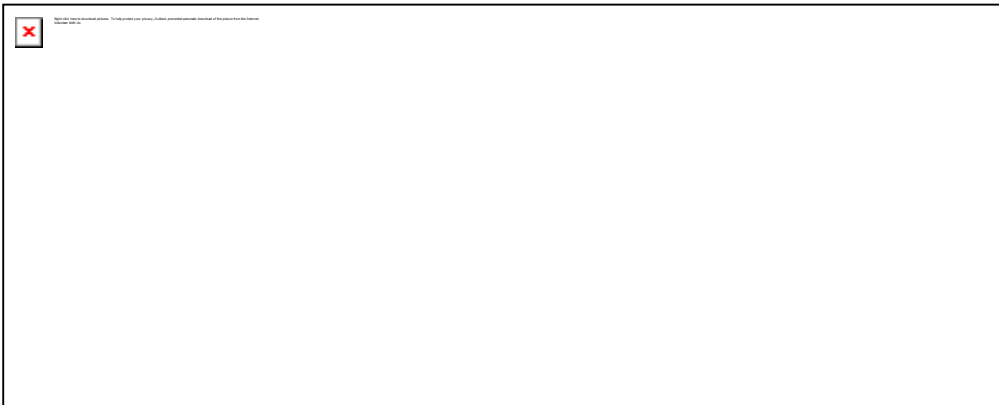
[REDACTED]

From: Sara Robin [REDACTED]
Sent: 04 April 2018 17:39
To: localplan@york.gov.uk
Cc: Ash, Merlin (NE); Rolls, Nadine
Subject: City of York Local Plan – Publication Draft (February 2018) Consultation
Attachments: 180404 Local Plan consultation Yorkshire Wildlife Trust response SVR.pdf; InPractice97_Sep2017_RylattGarsideRobin.pdf

A consultation response from the Yorkshire Wildlife Trust is attached. Also a journal article which is relevant to the Trust's representation and is referenced in the response.

Yours

Sara Robin
Conservation Officer (Planning)
Yorkshire Wildlife Trust
Tel: [REDACTED]
Email: [REDACTED]
Website: www.ywt.org.uk



Yorkshire Wildlife Trust is a company limited by guarantee, registered in England Number 409650.
Registered Charity Number 210807. Registered Office: 1 St George's Place, York, YO24 1GN.

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

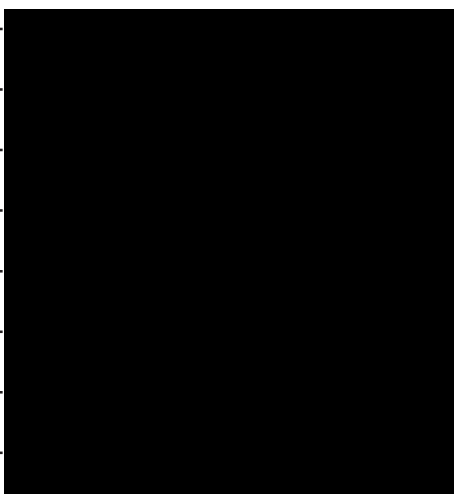
To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Ms	
First Name	Sara	
Last Name	Robin	
Organisation (where relevant)	Yorkshire Wildlife Trust	
Representing (if applicable)		
Address – line 1		
Address – line 2		
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		
E-mail Address		
Telephone Number		

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

- Online via our website www.york.gov.uk/localplan.
- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Yorkshire Wildlife Trust welcomes Policy G12 Biodiversity and access to nature. However at Point I of policy G12 there is a lack of clarity about the status of Local Nature Reserves.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

x Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input type="checkbox"/>	Justified	<input type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Point i of Policy G12: *avoid loss or significant harm to Sites of Importance for Nature Conservation (SINCs), whether directly or indirectly. Where it can be demonstrated that there is a need for the development in that location and the benefit outweighs the loss or harm the impacts must be adequately mitigated against, or compensated for as a last resort;*

This paragraph would be improved by including **Local Nature Reserves (LNR)** as although these are designated and recorded nationally the NPPF does not have specific mention of protecting these sites and York has a number of LNRs

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Point i of Policy G12: *avoid loss or significant harm to Sites of Importance for Nature Conservation (SINCs), whether directly or indirectly. Where it can be demonstrated that there is a need for the development in that location and the benefit outweighs the loss or harm the impacts must be adequately mitigated against, or compensated for as a last resort;*

Should be changed to:

Point i of Policy G12: *avoid loss or significant harm to **Local Nature Reserves**, Sites of Importance for Nature Conservation (SINCs), whether directly or indirectly. Where it can be demonstrated that there is a need for the development in that location and the benefit outweighs the loss or harm the impacts must be adequately mitigated against, or compensated for as a last resort;*

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

x

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Site ST15 and Policy SS13. Yorkshire Wildlife Trust is concerned that the present configuration of this site will have unacceptable impacts on the Elvington Airfield SINC. The SINC is an area of grassland which is very important for breeding skylark and is almost certainly supporting birds which are part of the designation of the Lower Derwent SPA. Development of a central part of the airfield will divide up the SINC with an area of development towards the western end of the airfield. At present birds are using all of the airfield for both breeding and overwintering as the grassland is one of the very few large areas of suitable habitat close to the SPA. The western end of the airfield is the least disturbed area furthest from the village of Elvington and nearest to the Tilmire SSSI and will therefore be the most valuable for wildlife. A configuration for the allocation which splits the SINC into three parts with a residential development in the centre of the airfield will have a much greater impact on biodiversity than using the eastern end of the airfield for development and leaving the western end as an undisturbed natural area.

Development of the suggested allocation would be contrary to local policy G12 and the Conservation of Habitats and Species Regulations 2017.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	<input type="text" value="SS13"/>	Site Ref.	<input type="text" value="ST15"/>
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Yorkshire Wildlife Trust is concerned that the present configuration of this site will have unacceptable impacts on the Elvington Airfield SINC. The SINC is an area of grassland which is almost certainly supporting birds which are part of the designation of the Lower Derwent SPA. At present birds are using all of the airfield for both breeding and overwintering as the grassland is one of the very few large areas of suitable habitat close to the SPA. The western end of the airfield is the least disturbed area furthest from the village of Elvington and closest to the Tilmire SSSI. Development of a central part of the airfield will divide up the SINC with an area of development in the centre of the airfield with a small undeveloped western compartment that will be very disturbed by the development and an undeveloped eastern section which will be close to the industrial and museum area and Elvington Lane and hence also disturbed. Management units will be fragmented and hence much less easily managed for biodiversity by grazing or hay cutting if required. The proposed configuration will also have two borders of developed land adjoining the SINC site where there will be potential for disturbance and damage. A recent article in the journal of the Chartered Institute of Ecology and Environmental Management "*Human Impacts on Nature Reserves – The Influence of Nearby Settlements*" (2017) by Fin Rylatt, Lauren Garside and Sara Robin which is included with this response shows that development close to nature reserves can lead to a wide range of damage and disturbance. Developments within 0-100 metres of a nature reserve are likely to have the most damaging effects. The Yorkshire Wildlife Trust's experience managing Wheldrake Ings nature reserve on the Lower Derwent Valley SPA is that SPA overwintering and breeding birds are very readily disturbed. Dog walking may be a particular problem so close to a large development. Further evidence of the problems of disturbance is shown in a recent report A Review of the Breeding Waders in the Lower Derwent Valley (2017) by David Tate for Natural England which can be provided if required.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

In order to make the Local Plan sound the Trust is of the opinion that the authority would need to either show conclusively that Elvington Airfield is not important for SPA birds or move the allocation to the east which would have the advantage of using an area of the airfield which is already hard standing so will have very little wildlife interest. Alternatively avoiding the airfield entirely and moving the allocation to the north with a large area of compensation habitat adjacent to the Tilmire SSSI. A full HRA should be provided for the York Plan.

Whichever solution is chosen the provision of alternative well designed green space to accommodate recreation and dog walking will be vital to avoid the continuing pressure on the Tilmire SSSI and Lower Derwent Valley SPA.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

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4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Allocation ST35 Queen Elizabeth Barracks at Strensall does not yet have sufficient background information available to ensure that there will not be an impact on the Strensall Common SAC. A full HRA has not been provided for the York Plan.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared Justified
 Effective Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref.

Site Ref.

ST35

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

In the Trust's previous comments in 2017 on this site our opinion was that there was insufficient information to be sure that a substantial residential development would not have impacts on the Strensall Common SAC. The Trust welcomes the much more detailed policy which is now provided, the redrawing of the boundary and the reduced housing numbers. These changes should go some way to preventing impacts. However background information on the present use of the site and impacts on the SAC and how to mitigate future impacts does not appear to be available. On page 384 of Appendix J-K of the Sustainability Appraisal it appears that the MOD were going to provide more information after the consultation on the Pre-publication draft of the Local Plan in 2017 but this information has not been provided for this consultation.

The allocation of this site without sufficient information on the potential impacts of increased disturbance and on the hydrology of the site would be contrary to the Conservation of Habitats and Species Regulations 2017.

6. (1) Please set out what change(s) you consider necessary to make the City of York

Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

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After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

More baseline data on visitors and disturbance to the SAC and ecological data. More information on potential hydrology impacts. This will mean there is sufficient information for an Appropriate Assessment of the site. A full HRA report for the York allocations would also give confidence that the plan was sound.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Part C - How we will use your Personal Information



We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature

Date

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

inpractice

Issue 97 | September 2017



One Year on from the EU Referendum

In this issue

CIEEM, Brexit and the
Natural Environment:
Achieving a Better Future

Brexit and Management
of Trans-Boundary Pollution

Brexit: A Devolved View

Human Impacts on Nature Reserves – The Influence of Nearby Settlements

Keywords: anthropogenic, disturbance, housing, nature reserves

Fin Rylatt, Lauren Garside and Sara Robin
Yorkshire Wildlife Trust

Recreational disturbance and damages can result in significant negative impacts on wildlife and habitats, and the addition of extra housing to an area can increase such pressures considerably. There has been little investigation of the impacts of increased recreational pressures on habitats outside of European Designated Sites and there is little evidence of impacts on non-statutory designated sites (such as Local Wildlife Sites). This article investigates the relationship between housing proximity and frequency of damage and disturbance on Yorkshire Wildlife Trust nature reserves, and how such impacts should be considered when determining the likely impacts of additional housing to an area.

Introduction

Yorkshire Wildlife Trust (YWT) manages over 100 nature reserves spanning a variety of landscapes and habitats in both rural and urban areas. Whilst our reserves are managed for people to re-connect with nature just as much as they are for wildlife, there is a delicate balance to be struck to satisfy both these differing needs and ensure that increased engagement with the public doesn't result in biodiversity losses.

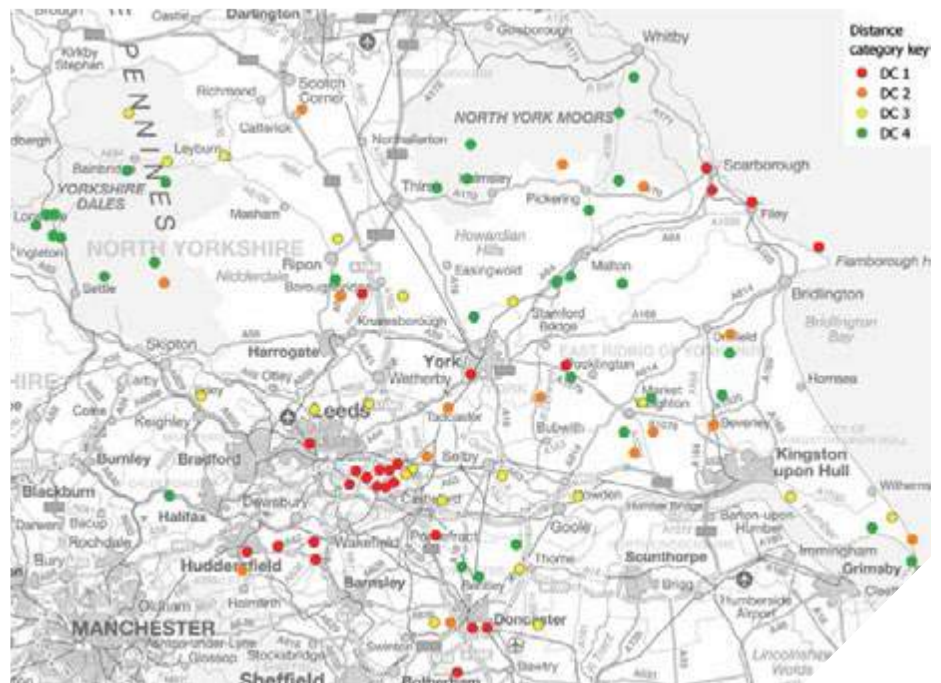


Figure 1. Map of Yorkshire Wildlife Trust nature reserves colour coded according to proximity to settlements. Distance categories – DC1: within 100 m, DC2: 101-500 m, DC3: 501-1000 m, DC4: 1001+ m.

Due to a lack of current research, Yorkshire Wildlife Trust undertook an analysis into the impacts of housing on nature reserves with the aim of better understanding why damage and disturbance occurs and how it may be prevented. This article presents an analysis of the different types of damage and disturbance and the impact that the proximity of housing may have on such incidents.

Methodology

In order to assess the problem, incidents of damages and disturbances were logged during visits to 94 nature reserves by YWT reserve officers during 2016. As such visits are ad-hoc in their nature, the data were collected opportunistically

rather than on set inspections specific for the study. Reserve officers were provided with definitions of each damage/disturbance type to ensure consistency. The data were collated on a central Excel database and analysed.

Five types of damage and disturbance were defined and recorded by reserve officers:

1. Litter and fly-tipping
2. Damage and disturbance by dogs and other domestic animals
3. Anti-social behaviour including vandalism, graffiti, barbecues
4. Theft and destruction of wildlife and property
5. Damage by vehicles.

Nature reserves were allocated to distance categories depending on their proximity to settlements (Figure 1). A settlement is defined in this study as any place made up of clusters of twenty or more dwellings, retail units and/or business/industry units.

The following categories were used to assess the relationship between disturbance and proximity of settlements to YWT nature reserves:

- **DC1:** 0-100 metres from nearest settlement (total reserves: 26)
- **DC2:** 101-500 metres from nearest settlement (total reserves: 16)
- **DC3:** 501-1,000 metres from nearest settlement (total reserves: 20)
- **DC4:** 1001+ metres from nearest settlement (total reserves: 32)

Frequency categories were used to quantify the occurrence of incidents. Each frequency category was assigned a numerical weighting so that a frequency **score** could be calculated for each category of damage and disturbance. This accounted for the differences in frequency of each individual report (with reports ranging from one-off incidents to frequent incidents) and allows for a simple comparison of frequency across all distance categories (Figure 2):

- **One-off** – incidents occurring only once/rare – assigned a weighting of 10
- **Occasional** – on average occurring once a month or less often – a weighting of 20

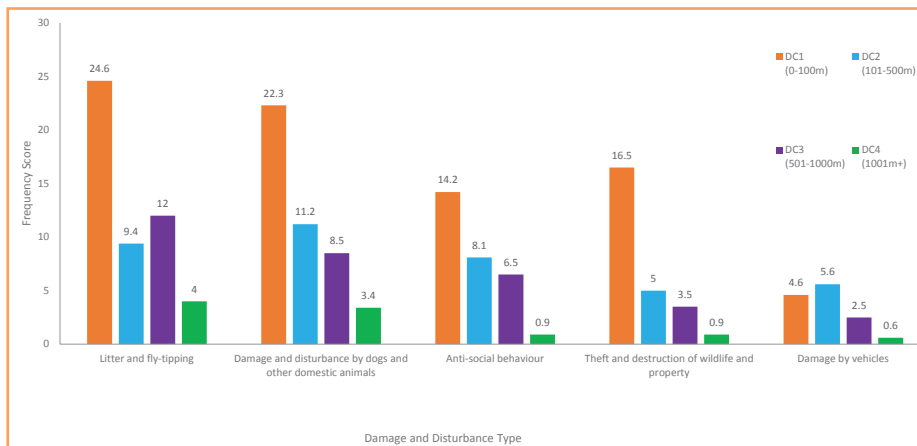


Figure 2. Frequency score of each damage and disturbance type across 94 nature reserves sub-divided by distance category.

- **Frequent** – on average occurring more than once a month – a weighting of 50

Limitations

The Yorkshire Wildlife Trust is unable to maintain a constant presence on nature reserves due to limited staff resources. The data collected are therefore likely to represent an underestimate of the number of damage and disturbance incidents, especially those which may be undetectable after the incident has occurred, such as disturbance of wildlife by people and dogs. The results of this analysis must therefore be used cautiously, especially in relation to mitigation for housing schemes. In these cases, detailed visitor surveys of nature reserves will be

required to determine the likely impacts of any increased housing on specific sites and the scale of mitigation required.

Results

Damages and disturbances were reported at 67 (71%) of the 94 nature reserves that were included in this analysis. This was limited to one type on many reserves but four or more types of disturbance were recorded from some reserves (12%). Table 1 details the 139 incidents by damage and disturbance type, distance and frequency category.

There was a significant negative relationship between the proximity of a nature reserve to a settlement and the frequency of damage and disturbance incidents (linear regression: $n = 94$, df

Table 1. Total number of damage and disturbance reports by distance category (sample size: 94 nature reserves; * = one-off, ** = occasional, *** = frequent).

Damage and disturbance type	Number of reports for each distance category												Totals
	DC1 (26 reserves)			DC2 (16 reserves)			DC3 (20 reserves)			DC4 (32 reserves)			
	*	**	***	*	**	***	*	**	***	*	**	***	
Litter and fly-tipping	3	8	9	0	5	1	1	4	3	4	2	1	41
Damage and disturbance by dogs and other domestic animals	1	6	9	0	4	2	1	3	2	1	5	0	34
Anti-social behaviour	2	5	5	1	6	0	0	4	1	3	0	0	27
Theft and destruction of wildlife and property	3	5	6	2	3	0	1	3	0	1	1	0	25
Damage by vehicles	1	3	1	1	4	0	0	0	1	0	1	0	12
Totals	67			29			24			19			139

Feature Article: Human Impacts on Nature Reserves – The Influence of Nearby Settlements (contd)

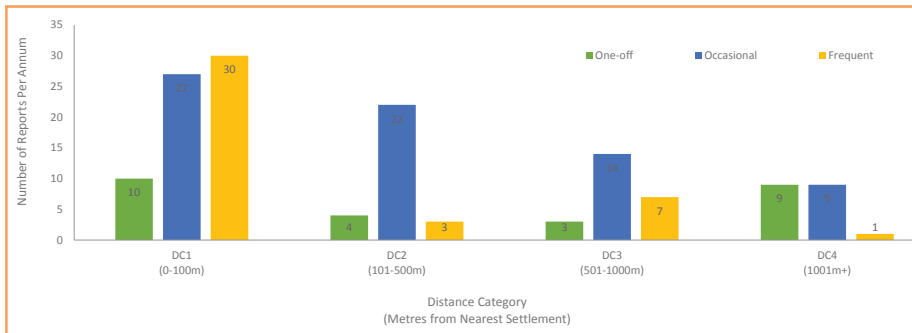


Figure 3. Total number of reports of all types of damage and disturbance for nature reserves in each distance category (139 incidents across 94 nature reserves).

1,92, $P < 0.0001$). The greatest frequency of incidents occurred at YWT reserves within 100 m of a settlement, which was true for all disturbance types apart from damage by vehicles (Figure 2).

Damages and disturbances reported as *frequent* (>1 per month) were highest at DC1 reserves (within 100 m of a settlement), accounting for 73% of all incidents described as *frequently* occurring (Figure 3). Litter and fly-tipping was the most recurrent type of damage and disturbance at YWT nature reserves (30%), with damage by dogs and other domestic animals occurring at similar levels (24%). Anti-social behaviour (19%) and theft and destruction of wildlife and property (18%) were less common and damage by vehicles (9%) was the least recorded damage type. (Table 1, Figure 4)

1. Litter and fly-tipping

Reports of litter and fly-tipping show that it is the most persistent damage type faced by YWT. Of the 41 reports of litter and fly-tipping, over 80% were described as either *occasional* or *frequent*. Most incidents of littering and fly tipping occurred on nature

reserves in DC1, accounting for 49% of the total number of reports, and the highest frequency score (Table 1, Figure 2). There is a clear decline in frequency score (62%) from DC1 to DC2 reserves.

Managing litter and fly-tipping occupies a great deal of YWT's time and involves dealing with an array of waste including general litter, unwanted furniture, building rubble and tyres. The build-up of litter on nature reserves leads to wide-ranging negative consequences including habitat degradation, chemical pollution and injury/death of wildlife.

The data collected in this study suggests that littering is especially problematic at reserves surrounded by residential areas. Anecdotal evidence from reserve officers also suggest that it is especially problematic around schools. Reserves located further away from settlements still suffer from litter and fly-tipping but reports tend to be of one-off incidents involving larger items (such as furniture fly tipping, Figure 5) rather than general dropping of litter (Figure 2).

2. Damage and disturbance by dogs and other domestic animals

This type of damage mostly concerns dog fouling on nature reserves but also includes other illegal activity such as sheep worrying by dogs and fly grazing by horses. The impact of cat predation on wildlife has not been taken into account in this study, due to practical difficulties associated with data collection. Nevertheless, this is likely to occur on YWT nature reserves, as highlighted in studies by The Mammal Society (Wood *et al.* 2003). It will be more prevalent in nature reserves close to settlements and must be given consideration during the determination of planning applications.

Those nature reserves closest to settlements experienced the highest frequency of damage relating to domestic animals, as dog owners are more likely to use reserves close to their homes for dog exercising. Fifty-eight per cent of all reserves within 100 m of a settlement (DC1) reported frequent or occasional damage of this type, compared with just 16% of DC4 reserves (>1 km away from settlement) (Table 1). The lower frequency of damage by dogs on DC4 reserves could be due to fewer people within close proximity of the nature reserves.

Although YWT allows dogs on many of its reserves, dog fouling is illegal and the unpleasant task of clearing up is too often left to YWT staff. Dog waste in large amounts is known to alter the chemical composition of soil, which leads to changes in the plant species which occur there, and may have significant impacts on the quality of grassland habitats (Bonner and Agnew 1983, Taylor *et al.* 2005).

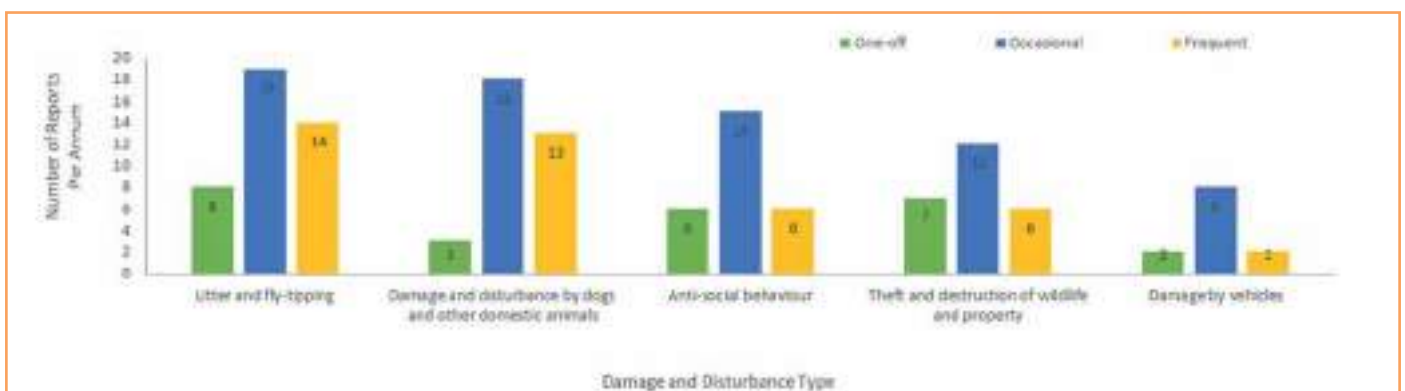


Figure 4. Total number of reports of each type of damage and disturbance (139 incidents across 94 nature reserves).



Figure 5. Fly tipping often consists of large pieces of furniture that are difficult or costly for people to dispose of, such as this armchair fly tipped on a SSSI meadow. Photo credit Jim Horsfall.

Dogs are often let off leads on nature reserves, contrary to YWT signposted instruction. Dogs therefore stray off paths, which are positioned to avoid sensitive wildlife areas, resulting in damage to habitats and disturbance of animals, which can have significant negative impacts on breeding and survival rates. Furthermore, serious incidents of dogs attacking sheep has led to the curtailment of sheep grazing on nature reserves, and the loss of biodiversity enhancement from conservation grazing schemes. This leads to serious issues for YWT where grazing is specified in legal management agreements.

3. Anti-social behaviour

Anti-social behaviour on reserves encompasses a wide range of activities including graffiti, camping and barbecues (Figure 6), which can be hugely damaging to habitats. Whilst graffiti may not have significant wildlife implications, it does reduce a reserve's attractiveness to visitors and their sense of safety. Removing graffiti is therefore an essential and recurring task at many reserves.

There is a clear link between the level of anti-social activity at nature reserves and the proximity of reserves to settlements (Figure 2). Forty-six per cent of DC1 reserves were subject to anti-social behaviour compared to just 25% of DC3 reserves and 9% of DC4 reserves (Table 1). This behaviour peaks during the summer

months when parties and barbecues become a regular occurrence at many reserves within 500 m of the nearest settlement (Figure 2). More secluded reserves are less prone to such activities.

4. Theft and destruction of wildlife and property

This type of damage can be very costly and proximity to settlements has a large bearing on how heavily a reserve is impacted. It includes the cutting down and burning of trees and plants, destruction and theft of gates and fences (Figure 7), damage to hides and spraying of herbicides on plants. Destruction of trees and habitats can have long-lasting impacts on nature reserves.

Reports of this type were greatest at DC1 reserves, accounting for 54% of all

reports of theft and destruction (Table 1). Frequent incidents were only reported from nature reserves within 100 m of the nearest settlement and became rarer the further from a settlement a reserve was located. Residential areas in the immediate proximity of a reserve are linked to the likelihood of forced access onto Trust land through the removal of fencing and gates.

5. Damage by vehicles

Damage by vehicles is the least frequent disturbance at YWT's nature reserves. Despite this, incidents can be amongst the most damaging with burnt-out cars (Figure 8) and vehicle use inflicting long-term and potentially irreversible damage to rare habitats such as salt marsh and MG4 grassland (Figure 9).



Figure 6. Campfire damage at woodland nature reserve. Photo credit Jim Horsfall.



Figure 7. Newly installed gates are frequently the target of thieves, often to allow illegal access for vehicles or livestock or to install the gate on private property. Photo credit Jim Horsfall.



Figure 8. Burnt-out car abandoned on a grassland SSSI nature reserve.
Photo credit Jim Horsfall.



Figure 9. Tyre marks caused by off-road driving on a sensitive saltmarsh nature reserve.
Photo credit Andrew Gibson.

Interestingly, damage by vehicles is the only type of damage and disturbance not correlated directly with distance category. Reports were greatest at reserves between 100 and 500 m from the nearest settlement (DC2: 42% of the total number of incidents, Table 1). Reserves over 500 m from the nearest settlement were subject to lower frequencies of damage by vehicles and reserves furthest from a settlement rarely reported this as a problem (DC4: 8% of total damage by vehicles reports).

The way forward

This analysis has highlighted that the proximity of a nature reserve to the nearest settlement can be a key predictor of the frequency of damage and disturbance likely to arise. Each of the five types of damage identified generally occurs more frequently the closer the reserve is to a settlement. This provides evidence that nature reserves within 100 m of settlements are vulnerable compared to secluded reserves located over 1 km from the nearest settlement. Although these results are not surprising, they nevertheless raise important questions. With biodiversity in the UK in long term decline (HM Government 2011) and development pressures to deliver increased housing numbers (Department for Communities and Local Government 2017), it is crucial that impacts are recognised and solutions sought. Protecting nature reserves from damage should be a planning priority, whilst at the same time the responsible public use of green spaces should be encouraged in order for communities to benefit from the numerous health and wellbeing benefits that they provide.

In this study, all but one type of damage and disturbance decreased between DC1 and DC2 reserves. The first step in the planning process should therefore be to locate new housing developments at least 100 m from reserves, and ideally more than 500 m away. Where this is not possible, the establishment of an ecological buffer, or 'eco-zone', between housing developments and nature reserves could help to reduce the likelihood of anti-social incidents, littering and dog fouling on reserves. Ideally, the 'eco-zone' should be provided within the development site boundary with its creation and management funded by the housing developer with ample space designated for various recreational activities.

Such an approach is taken around the Thames Basin Heath Special Protection Area (SPA) through the creation of SANGS – Suitable Alternative Natural Green Spaces which divert recreational disturbance pressures away from sensitive bird habitats, avoiding bird disturbance incidents (Thompson 2015). For SANGS to be effective they must be more attractive to users than the nearby nature reserve or Special Protected Area, and the careful design of these areas is important in deterring damage incidents.

Education and engagement with local residents is essential in the effort to promote the responsible use of nature reserves and reduce impacts such as dog fouling and anti-social behaviour. YWT offers free membership for residents of new housing schemes to encourage residents to connect with and value the wildlife surrounding their new home. Nature reserve supporter groups ('Friends of' groups) can also be an important tool in reducing damage and disturbance incidents through creating a sense of community ownership over reserves and fostering community cohesion. Associated volunteering and outreach events provide health and wellbeing benefits through physical activity, connecting with nature and meeting neighbours.

The change in land use to accommodate new housing poses a significant risk to nature reserves nationally. Proper consideration of impacts along with sensitive siting and design of housing developments can go a long way towards

avoiding damage and disturbances, and the provision of natural greenspaces within development sites can provide long-term benefits for communities. This is the policy adopted by The Wildlife Trust nationally. At present, planning policy offers limited protection for non-statutory sites, with no specific mention in the National Planning Policy Framework, therefore it can be difficult for NGOs to negotiate adequate mitigation to protect their sites from additional housing. Better protection of non-statutory sites through national and local policy is essential to ensure that new housing sites are properly delivered for both wildlife and communities. Improved facilities such as dog waste bins, interpretation boards and footpaths could also help to promote responsible usage of nature reserves, and help to ensure that reserves remain rich in biodiversity.

Note

The full report on which this article is based is available from the authors on request (lauren.garside@ywt.org.uk).

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Acknowledgements

The authors would like to acknowledge the help and expertise of the Yorkshire Wildlife Trust nature reserves officers in collecting the data for this report. The invaluable comments of several reviewers greatly improved the data analysis and scope of the report, therefore thanks go to Louise Wilkinson, Professor Alastair Fitter, Bob Missin and the *In Practice* Editorial Board, in addition to David Gregory for producing the reserves map.

About the Authors



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Sara Robin is a Conservation officer at the Yorkshire Wildlife Trust, commenting on planning applications in North Yorkshire. She has a particular interest in mitigation

for developments, the impacts of development on wildlife sites, and sustainable transport.

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From: Jones, Christopher (GVA) [Christopher.Jones@gva.co.uk]
Sent: 04 April 2018 17:50
To: localplan@york.gov.uk
Cc: Jayshree Patel (Jayshree.Patel@homesengland.gov.uk)
Subject: Reg 19 Local Plan Consultation - Homes England Representation
Attachments: HE York Central Reg 19 Reps FINAL.pdf

Dear Sir/Madam

Please find attached a representation to the Publication Draft Local Plan on behalf of Homes England. I would be grateful if you could confirm receipt of this email and attachment by reply.

Regards

Chris

Chris Jones
Director

GVA

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GVA



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Dear Sir/Madam

Representations to the Publication Draft Local Plan (Regulation 19) Consultation

GVA has been instructed by Homes England to prepare and submit representations to the Publication Draft Local Plan (Regulation 19) Consultation.

Homes England is the government's housing, land and regeneration agency and is responsible for increasing the number of new homes that are built in England including affordable homes, homes for market, sale or rent increasing the supply of housing on public land and speeding up the rate that it can be built, helping to stimulate local economic growth by using its land and investment, and attracting private sector investment in local areas. It has a direct interest in York being a landowner of circa one-third of the York Central site (Policy SS4; site allocation ST5) and an active partner in the York Central Partnership (YCP).

YCP has submitted separate representations through its planning consultant, Arup, and Homes England supports the comments made, as well as those made through representations to previous consultations during the preparation of the emerging York Local Plan.

In addition, it submits the following representations as a landowner and partner with a commitment 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.

Background to York Central

YCP is progressing a masterplan for York Central, which is being informed by a significant amount of design work, technical assessments and stakeholder/community engagement undertaken by its project team (led by Arup and including Allies and Morrison and Gustafson, Porter and Bowman). The work is informed by viability advice from Savills.

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It is also preparing detailed proposals for the new western access road, which will provide the highway capacity to allow the quantum of development proposed within the Local Plan to come forward.

The proposals for York Central also include work on the provision of a new major park, a new public square linking a new western entrance to the station to the National Railway Museum and other areas of open spaces. There is also provision for new pedestrian and cycling access, and the upgrade of the current road and pedestrian tunnels at the eastern end of Leeman Road. The proposals have been subject to an on-going series of pre-applications discussions with relevant Council officers including, but not limited to development management, transport, design and architecture, landscape and archaeology, which have been progressing since last year.

YCP is also working closely with a number of statutory bodies including Historic England, the Environment Agency and Natural England on relevant issues.

Wider community and stakeholder consultation has been ongoing since early 2016. This commenced with a city-wide consultation on the broad development principles of York Central in January/February 2016, continued with a focused consultation on the preferred option for the new access road in 2017 and more recently involving a broad 3-stage engagement process culminating in a 6 week exhibition on the draft masterplan proposals (due to end April 2018).

This ongoing work is being progressed to inform an outline planning application for a mixed use scheme and a detailed application for the new western access road, both of which will be submitted concurrently in 2018.

Funding for the delivery of this critical infrastructure has been secured from the West Yorkshire Combined Authority Transport Fund to bring forward the new western access road with the intention that the road is operational by March 2021. A small amount of development is possible prior to the delivery of the road (circa 400 homes), allowing development of this significant brownfield site to commence from 2019/20. YCP has also been successful in progressing to the co-development stage of the competitive Housing Infrastructure Fund (HIF) process. HIF is a government capital grant programme of up to £2.3 billion, which will help to deliver up to 100,000 new homes in England. The Housing Infrastructure Fund is a government capital grant programme of up to £2.3 billion, which will help to deliver up to 100,000 new homes in England.

Relationship with the Local Plan

York Central is a strategic development site with local and city-wide impacts which must be effectively planned for. Policy SS4 (York Central) sets a clear policy position relating to the development and is therefore vital to the long-term success of the development. It also assists in ensuring that the development is well-integrated with other local proposals (including improvements to the station and land to the front of the station) and wider development and infrastructure proposals across York.

In addition, there are a number of policies which directly relate to the site allocation, specifically policies SS3 (York City Centre), R3 (York City Centre Retail), EC1 (Provision of Employment Land) and T3 (York Railway Station and Associated Operational Railways).

Homes England, as part of YCP, has engaged with the preparation of the Local Plan. It considers the aforementioned policies sound and supports their inclusion within the Local Plan. In particular, Homes England strongly supports the allocation of York Central for housing and employment uses through Policies H1, EC1 and SS4. Through the representations submitted by Arup, the Partnership has confirmed that it anticipates delivering between 1,700

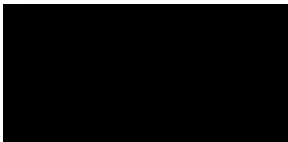
and 2,500 homes, of which at least 1500 will be in the Plan period, and a total of approximately 100,000 square metres of commercial uses.

Arup has submitted more detailed representations on behalf of YCP to a number of the draft Local Plan policies (SS4, H1, T1 and T8) and Homes England supports and endorses the representations made. In addition, Homes England will assist YCP in the preparation of further information, where necessary, to support the proposed allocation of York Central as a major strategic site.

We are grateful for the opportunity to comment on the draft plan and ask that consideration is given to the above comments, in order that the Local Plan can enable the successful delivery of York Central.

We do not consider it necessary to participate at the hearing sessions of the Public Examination in a separate capacity to YCP, albeit we reserve the right to comment on any modifications to the Local Plan that may be made in the future.

Yours faithfully



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For and on behalf of GVA Grimley Limited

cc: Jayshree Patel (Homes England)

[REDACTED]

From: Ash, Merlin (NE) [REDACTED]
Sent: 04 April 2018 18:10
To: localplan@york.gov.uk
Cc: Hall, Richard (NE); Christian, Simon (NE)
Subject: RE: City of York Local Plan – Publication Draft (February 2018) Consultation
Attachments: 239830 Natural England Response.pdf; Previous response 227554 Natural England Response.pdf

Dear Alison Cooke,

Thank you for consulting Natural England on the City of York Local Plan – Publication Draft (February 2018) consultation. Please find attached our response letter in addition to our previous response for ease of reference.

Yours sincerely,

Merlin Ash
Lead Adviser
Yorkshire and Northern Lincolnshire Team
Natural England
[REDACTED]
[REDACTED]

www.gov.uk/natural-england

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These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

From: Ash, Merlin (NE)
Sent: 21 February 2018 15:01
To: Consultations (NE) <consultations@naturalengland.org.uk>
Subject: Fwd: City of York Local Plan – Publication Draft (February 2018) Consultation

Begin forwarded message:

From: "localplan@york.gov.uk" <localplan@york.gov.uk>
Date: 21 February 2018 at 11:54:12 GMT
Cc: "localplan@york.gov.uk" <localplan@york.gov.uk>
Subject: City of York Local Plan – Publication Draft (February 2018) Consultation

**City of York Local Plan – Publication Draft (February 2018) Consultation
in compliance with Regulation 19 of the Town and Country Planning (Local Planning)
(England) Regulations 2012**

I am writing to inform you about the opportunity to comment on the Local Plan Publication draft (February 2018) document.

The emerging Local Plan aims to support the city's economic growth, provide much needed housing and help shape future development over the next 15-years and beyond. It balances the need for housing and employment growth with protecting York's unique natural and built environment.

You may be aware that the Local Plan has been prepared over a number of stages. Previous consultation has taken place on Preferred Options (2013), Further Sites Consultation (2014), Preferred Sites Consultation (2016) and Pre-Publication Draft consultation (2017), which you may have been involved with. We have considered the responses received at all stages, together with other available evidence, as part of preparation of the plan.

We are now publishing the City of York Local Plan Publication draft to provide an opportunity for representations to be made regarding legal compliance and the 'soundness' of the Local Plan, before it is submitted for Examination in Public by an independent Planning Inspector.

The consultation period for the Local Plan Publication draft (2018) document starts on **Wednesday 21st February 2018**. All consultation material will be live on the Council's [website](#) and available in libraries from this date. Please see the [Statement of Representation](#) Procedure document, for more information.

Representations must be received by **midnight on Wednesday 4th April 2018** and should be made on a response form. Response forms are available on the Council's [website](#) or you can complete an online response form via www.york.gov.uk/consultations . Alternatively, hard copies are available from the Council's West Offices reception or from your local library.

Any representations received will be considered alongside the Local Plan Publication draft when it is submitted for Examination in Public. The purpose of the Examination is to consider whether the Local Plan complies with relevant legal requirements for producing Local Plans, including the Duty to Cooperate, and meets the national tests of 'soundness' for Local Plans (see overleaf). Therefore, representations submitted at this stage must only be made on these grounds and, where relevant, be supported with evidence to demonstrate why these tests have not been met.

Legal Compliance

To be legally compliant the Joint Plan has to be prepared in accordance with the Duty to Cooperate and legal and procedural requirements, including the 2011 Localism Act and Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Soundness

Soundness is explained in paragraph 182 of the National Planning Policy Framework (NPPF). The Inspector conducting the Examination in Public has to be satisfied that the Local Plan is 'sound' –namely that it is:

- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework (NPPF).

To help you respond, we have included Guidance Notes as part of the response form. We recommend that you read this note fully before responding.

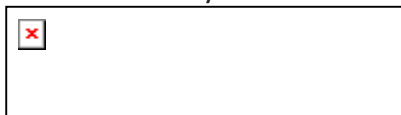
At this stage, unless you indicate you wish to appear at the Examination to make a representation you will not have the right to do so. Any written representations made will be considered by the independent Planning Inspector.

All of the consultation and further evidence base documents published at previous rounds of consultation will also be available on the Council’s website at www.york.gov.uk/localplan from 21st February 2018.

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

We look forward to receiving your comments.

Yours faithfully



Mike Slater
Assistant Director – Planning and Public Protection

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Date: 04 April 2018
Our ref: 239830



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Dear Alison Cooke

Planning consultation: City of York Local Plan – Publication Draft (February 2018) Consultation in compliance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Thank you for your consultation on the above dated 21 February 2018 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England recognises that comments at this stage of the plan making process should be based on the Tests of Soundness as set out in paragraph 182 of the National Planning Policy Framework (NPPF). Therefore we have set out comments below under section 1 'Legal compliance and soundness concerns', along with Section 2 'Additional advice' on improvements to the Plan, which should be considered before formal submission to the Secretary of State.

1. Legal compliance and soundness concerns

Natural England has a number of concerns with the plan which should, in our view, be addressed in order that the plan can be considered sound and legally compliant.

1.1 Habitats Regulations Assessment

Natural England notes that no updated final assessment under the Conservation of Habitats and Species Regulations 2017 has been provided in support of this consultation. We have a number of outstanding concerns regarding the previous iteration of the assessment, as set out in our letter dated 30 October 2017 (our ref 227554) which we attach with this letter for your ease of reference.

1.2 Sustainability Appraisal

Natural England advises that the Sustainability Appraisal should be updated in the context of the assessment and conclusions of the Habitats Regulations Assessment when that information becomes available. We also understand that additional air quality assessment is being undertaken in relation to predicted traffic emissions as a result of the plan which will address the impact of such emissions on nationally designated sites including Fulford Ings Site of Special Scientific Interest (SSSI), as well as internationally designated sites, and advise that the appraisal should be updated based on the findings of this study.

1.3 Local Plan Publications Draft February 2018

Policy ST35 Queen Elizabeth Barracks, Strensall

1.3.1 Natural England notes that a report dated December 2017 has been provided in support of this Strategic Site ST35. While we broadly welcome the evidence and assessment provided we consider that insufficient information has been provided in relation to the assessment of recreational disturbance and urban edge effects upon Strensall Common Special Area of Conservation (SAC) and SSSI which lies adjacent to the Strategic Site.

1.3.2 Natural England does not consider that sufficient information has been provided to satisfy the requirements of the Habitats Regulations Assessment and therefore does not consider the plan legally compliant. Furthermore we do not consider the assessment provides sufficient certainty to determine whether the proposed housing numbers can be delivered on this site which may be a risk to the soundness of the plan and compliance with national policy.

1.3.3 Natural England broadly welcomes the requirements set out in policy SS19, in relation to the avoidance and mitigation of impacts on Strensall Common SAC and SSSI, however we do not consider that sufficient evidence is available to judge whether such measures would be sufficient to avoid adverse effects on the integrity of the SAC or damage to the interest features of the SSSI.

1.3.4 We note that an air quality assessment has been undertaken that identifies potentially significant increases in relation to traffic emissions from this site and employment site E18. Natural England does not wish to comment at this stage until the assessment of the contribution of the full plan alone and in combination with other relevant plans and projects has been provided.

Policy ST15 Land West of Elvington lane

1.3.5 Natural England has outstanding concerns regarding the potential for functional linkages between birds found on ST15 and the Lower Derwent Valley Special Protection Area (SPA). We expect this to be addressed in the forthcoming final Habitats Regulations Assessment.

2. Additional advice

2.1 Local Plan Policies

Policy GI2 Biodiversity and Access to Nature

2.1.1 Natural England broadly welcomes this policy but recommends that you consider including references to the protection afforded to internationally and nationally designated sites in line with paras 113 and 117 of the NPPF. Ensuring to distinguish between the hierarchy of sites and their commensurate protection. We note that the protection of designated sites is embedded across the plan as well as this policy and that the hierarchy of designated sites is applied in the policies and assessments. However we advise that for clarity, particularly around the treatment of windfall sites that this policy is updated.

2.1.2 In relation to this we also recommend that you consider making specific to protected species and priority species in policy GI2 and that the policies map is updated to clearly distinguish between nationally and internationally designated sites.

Soils and Best and Most Versatile Agricultural Land

2.1.4 Natural England notes the consideration of soils and agricultural land in policies CC1 and SS21 and the Sustainability Appraisal. However, considering the findings of the Sustainability Appraisal, we advise that you consider including a specific reference to the protection of best and most versatile (BMV) agricultural land, for instance in policy EC5. In addition we would welcome reference to the importance of the protecting wider soils resources including in relation to ecosystem services such as carbon storage and their role in flood prevention. NPPF para 112 states that Local Planning Authorities should take into account the economic and other benefits of the best and most versatile agricultural land while para 109 is clear that planning system should contribute to and enhance the natural and local environment by protecting and enhancing soils.

Ancient Woodland and Veteran Trees

2.1.5 Natural England advises that you consider including protection for ancient woodland and veteran trees in policy G14 Trees and Hedgerows. We advise that para 118 of the NPPF is clear that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss. We note that there are a number of woodlands on the Ancient Woodland Inventory within the City of York Council Area which we would like to see included in the policies map. For more information on ancient woodland please see the gov.uk website at: <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>. For mapping please see Magic: <http://magic.defra.gov.uk/>

Policy ST15 Land West of Elvington lane

1.3.6 Natural England notes that ST15 has been through a number of iterations with different boundaries and footprints and that a great deal of evidence has been gathered for different site boundaries but has not been made available publicly. We would encourage you to consider making the wider evidence base for this site available and clarify what evidence accords to which variation of the site. For instance we are unclear whether any assessment has been undertaken for the central segment of the allocation which is in a third party ownership and has not been involved in the earlier iterations of this allocation.

1.3.7 Natural England notes and welcomes the assessment against objective 8 in the Sustainability Appraisal which we consider to be detailed and accurate. We agree with the scoring given and the weighting applied alongside other sustainability concerns.

1.3.8 We note para 7.1.9 states that no appropriate alternatives could be found and the reasons for this and that the spatial strategy and allocation are determined to be the most sustainable option despite the potential impacts identified in relation to the biodiversity objective. Natural England defers to City of York council on these matters but would welcome further elucidation regarding how competing sustainability concerns were weighed against each other.

1.3.10 In the context of the conclusions of the Sustainability Appraisal concerning the preferred spatial strategy and site ST15 we welcome policy SS13 which we consider to set out the necessary compensation and mitigation measures necessary in relation to the threats identified. In particular we welcome the identification of the biodiversity mitigation/ compensation area on the proposals map, the ambition for no net loss and to maximise further benefits for biodiversity in criterion v., the avoidance, mitigation and compensation requirements of criterion vi. (including a 400m buffer). We consider the requirement for the provision of compensation five years prior development in criterion vii of great importance considering the sensitivity of the location in relation to internationally, nationally and locally designated sites. In addition the requirement for the site to be retained and monitored in

perpetuity is very welcome in this context.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter please contact Merlin Ash at merlin.ash@naturalengland.org.uk or on 02080 266382. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Richard Hall
Yorkshire and Northern Lincolnshire Team
Natural England

Date: 30 October 2017
Our ref: 227554



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BY EMAIL ONLY

Dear Martin Grainger

Planning consultation: City of York Local Plan Pre-publication draft (Regulations 18 Consultation, Sept 2017)

Thank you for your consultation on the above dated 18 September 2017 which was received by Natural England 18 September 2017 on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

1. City of York Local Plan Habitats Regulations Assessment September 2017

1.1 Natural England broadly welcomes the Habitats Regulations Assessment (HRA) report which, notwithstanding the identified requirement for further appropriate assessment, we consider to be clear, logical and appropriately referenced. We concur with the selection of sites and welcome the identification of potential mechanisms by which relevant European sites may be affected.

1.2 We broadly welcome and agree with the screening of policies in section 3, however we have a number of concerns regarding the screening out of certain impacts which we have set out below.

1.3 Natural England agrees that air quality impacts from traffic emissions on roads in close proximity to Strensall Common Special Area of Conservation (SAC) cannot be ruled out with regards to likely significant effects and that traffic modelling should be undertaken. However this should be with regards to the impact of the wider plan, and indeed any relevant neighbouring plans, not just the nearby housing and employment allocations. However it is correct to identify that these sites are likely to contribute most.

1.4 In addition, while the issues identified in paras 3.61 to 3.72 can be considered in the assessment, the assessment of the impact 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 whether these roads are likely to see significant increases as a result of the City of York Local Plan, either alone or in-combination.

1.5 While we broadly agree with the assessment of recreational disturbance in paras 3.24 to 3.51 we consider that the wider cumulative and in-combination impacts of the City of York Local Plan and potentially neighbouring plans should be considered in relation to recreational disturbance on Strensall Common SAC, not just nearby sites SS19, H59 and E18. Furthermore, while we do not necessarily disagree with the conclusions of no likely significant effects with regards to impacts on the Lower Derwent Valley European Sites, further discussion of available alternative greenspace and potential for mitigation should be explored. In addition cumulative and in-combination effects

with the wider plan and neighbouring plans should be considered in relation to this issue.

1.6 We agree with the conclusions with regards to the impacts of policy SS19 and sites E18 and H59 that further information is required concerning recreational disturbance, traffic emissions and hydrology, which should be considered in an appropriate assessment. However we advise that, considering the proximity of ST35 to Strensall Common SAC we advise that wider urban edge effects should be considered in the appropriate assessment in addition to recreational pressures.

1.7 We also note and welcome the identification that further assessment is required with regards to the potential for impacts from ST15 on Lower Derwent Valley SPA bird species.

1.8 Finally we note that site ST35 includes a section of Strensall Common SAC within its boundaries. We advise that this should be removed from the boundaries of ST35 in order to avoid any direct loss of designated features.

2. City of York Local Plan Sustainability Appraisal Pre-publication Draft Regulations 18 Consultation September 2017

2.1 Natural England notes that policy SS19 is scored as (?) 'uncertain or insufficient information on which to determine effect' in relation to SA Objective 8 and accepts that there is outstanding information with regards to the assessment under the Habitats Regulations Assessment as discussed above. However, despite the mitigation and compensation measures proposed, Natural England considers that this site should be scored negatively in relation to impacts on biodiversity considering the difficulty in mitigating for recreational disturbance on Heslington Tillmire SSSI. This is due the scale and proximity of the proposal and the fact that the SSSI is CRoW Act 2000 open access land and has breeding bird, tall herb gen plan community interests and site management which are very sensitive to recreational pressures.

2.2 Para 118 of the NPPF makes it clear that where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site and any broader impacts on the national network of SSSIs. Furthermore Article 5(1) of the SEA Directive is clear that *'the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, should be identified, described and evaluated'*.

2.3 As such Natural England expects the Sustainability Appraisal and supporting evidence to clearly set out the wider sustainability reasons why the benefits of this site outweigh the impact of development on Heslington Tillmire SSSI. Without clear evidence of this Natural England would consider the site to be unsound with regards to NPPF para 118 and not legally compliant concerning the SEA Directive.

2.4 We note that para 7.1.7 states that no appropriate alternatives to site ST15 were identified that didn't compromise the Spatial Shapers of the City as well as that combinations of smaller sites to meet the same housing target were shown to be less sustainable. We recommend that more details are provided of alternatives which were considered to compromise the Spatial Shapers of the City criteria and explanation of how the different components of the Spatial Shapers of the City framework, which includes consideration of nature conservation sites, were weighed up against each other to determine that ST15 was the most sustainable option. We also consider that further narrative should be provided of why a single urban extension, in the context of ST15 with its very significant biodiversity constraints, is more sustainable than a combination of alternative sites, in order to expand upon the evidence provided by the scoring in appendix H.

2.5 While we note and welcome the narrative regarding the rejection of alternatives with regards to high level housing and employment growth options and the scoring of alternative sites in appendix H we are unable to identify any detailed assessment of alternatives to strategic site ST15 other than the statement in paras 7.1.7 regarding assessment using the Spatial Shapers of the City framework.

2.6 We recommend that para 7.1.6 regarding the avoidance of locations that have high biodiversity

and recreational value in the context of ST15 should be clarified. While we recognise that the small reduction in housing numbers and increase in distance from the SSSI is an improvement over the original allocation. We would not consider this to constitute the avoidance of sites of high biodiversity value, especially in the context of the wider impacts of the revised site boundaries on the Elvington Airfield SINC and protected species such as skylark. We also do not understand the statement "...this conclusion remains valid" in this context.

3. City of York Local Plan Pre-publication Draft Regulations 18 Consultation September 2017

3.1 Provided that Natural England's concerns regarding the sustainability of site ST15 regarding impacts on Heslington Tillmire SSSI or the potential for impacts on Lower Derwent Valley SPA birds, as discussed in sections 1 and 2 of this letter above, we broadly welcome the criteria set out in Policy SS13. In particular we welcome the identification of the biodiversity mitigation/compensation area on the proposals map, the ambition for no net loss and to maximise further benefits for biodiversity in criterion v., the avoidance, mitigation and compensation requirements of criterion vi. (including a 400m buffer). We consider the requirement for the provision of compensation five years prior development in criterion vii of great importance considering the sensitivity of the location in relation to internationally, nationally and locally designated sites. In addition the requirement for the site to be retained and monitored in perpetuity is very welcome in this context.

3.2 Finally, with regards to SS13, Natural England considers the mitigation of recreational impacts on Heslington Tillmire SSSI to be of the utmost importance. Therefore, while we broadly welcome the requirement for the provision of an detailed site wide recreation and access strategy to minimise indirect recreational disturbance resulting from development and complement the wetland habitat buffer, we advise that the council considers whether this mitigation should be set out through a masterplan at the plan stage in order to ensure delivery. While masterplanning is not always necessary at the plan stage, we consider that it would be appropriate in the context of such a large allocation in such a sensitive location.

3.3 Natural England advises that without the further information identified as being required with regards to site ST35 in the HRA and further assessment, we do not consider that this site is likely to be deliverable which may affect the soundness of the plan. Notwithstanding these concerns we are broadly content with policy SS19 as it stands. However we advise that, should further assessment suggest that this site is deliverable without adverse effects on the integrity of Strensall Common SAC, the requirements of SS19 should be updated in the light of these findings. In particular we would be keen to see detailed masterplanning detailing how urban edge and recreational pressures can be avoided.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter please contact Merlin Ash at merlin.ash@naturalengland.org.uk or on 02080 266382. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Merlin Ash
Yorkshire and Northern Lincolnshire Team
Natural England

From: jadu-www@rsvm121.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 04 April 2018 18:20
To: localplan@york.gov.uk
Subject: A new Local Plan Publication Draft response form has been submitted

A new Local Plan Publication Draft response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

Web ref: 105183

Date submitted: 04/04/2018

Time submitted: 18:20:05

Thank you for submitting your Local Plan Publication Draft response form (ref: 105183, on 04/04/2018 at 18:20:05) to City of York Council.

The following is a copy of the details you included.

About your comments

Whose views on the Local Plan publication draft do your comments represent? Own comments

About you/the organisation/individual/group you're representing

Please complete in full; in order for the Inspector to consider your representations names and postal addresses must be provided.

Title: Dr

Forename: Alan Christopher

Surname: Price

Name of the organisation/individual/group you're representing:

Address (building name/number and street): [REDACTED]

Address (area): [REDACTED]

Address (town): [REDACTED]

Postcode: [REDACTED]

Email address: [REDACTED]

Telephone number: [REDACTED]

What are your comments about

You may complete this form more than once - you should **submit a separate form for each issue to you want to raise** relating to the Local Plan 'publication draft', the Policies Map or the Sustainability Appraisal/Strategic Environmental Assessment.

Which document do your comments relate to? Sustainability Appraisal/Strategic Environmental Assessment

Legal compliance of the document

'Legally compliant' means asking whether or not the plan has been prepared in line with statutory regulations, the duty to cooperate, and legal procedural requirements such as the Sustainability Appraisal. Details of how the plan has been prepared are set out in the Consultation Statements and Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan.

Do you consider the document is legally compliant? Yes, I consider the document to be legally compliant

Do you consider the document to comply with the Duty to Cooperate? YesCompliestoDuty

Please justify why you do/do not consider the document to be legally compliant or in compliance with the Duty to Cooperate:

I presume the plans are prepared within a legally compliant framework. These are questions suitable for a Lawyer. I am writing as Haxby resident likely to be affected by these plans

Whether the document is/is not 'sound'

Deciding whether you consider the document to be 'sound' means considering whether it's 'fit for purpose' and 'showing good judgement'. The inspector will use the public examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness':

- **positively prepared** - prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development
- **justified** –the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- **effective** – deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- **consistent with national policy** – enables the delivery of sustainable development in accordance with the policies in the framework

Do you consider the document to be 'sound'? No, I do not consider the document to be sound

Please indicate which of four 'tests of soundness' relate to your answer:

[Response - SoundnessYES] not positively prepared,not justified,not effective,not consistent with national policy

Please give reasons for your answer(s):

The document meets none of the above criteria. Haxby already experiences problems of congestion, strain on public services and increasing pollution consistent with the objective reality that it has reached a population limit consistent with the criteria described. There appears to be no consideration the impact of increasing the village' population on the scale proposed. No addition provision of schooling or health provision is envisaged. The already overstrained road network will be further overloaded, as no possibility exists of increasing the number road links in and out of Haxby. Sustainability has thus not even remotely been addressed, and I don't see how that can be consistent with national policy. Incidentally, the previous page should remain visible while this response is being framed.

Which part of the document do your comments on 'soundness' relate to? Please provide a paragraph number, a policy reference or a site reference: ST9

Necessary changes

You can suggest any change(s) you consider necessary to make the Local Plan legally compliant or sound - you'll need to say why the modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Your suggestion should cover succinctly all the information, evidence and supporting information necessary to support/justify it. There will not normally be a subsequent opportunity to make further representations; these would only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

Three would have to be an increase in the number of road links in an out of Haxby. Making the ring road dual carriageway does not address the fact that traffic will grind to a standstill on other roads within Haxby. As this change is impossible the only alteration that would be realistic is to re-open the railway station.

There would have to be one new primary school a new NHS surgery and a new dentist. Increased traffic, including during building will pose a risk to life. Oaken Grove is already dangerous for children and thus traffic calming measures would have to be introduced. Air pollution will also rise to unacceptable levels and this can't be addressed except with greatly increased provision of public transport.

If you're seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination? No hearing sessions

If you select 'No', your suggestions will still be considered by the independent planning inspector by way of written representations.

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt, to hear those who want to participate at the hearing sessions.

From: jadu-www@rsvm121.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 04 April 2018 18:21
To: localplan@york.gov.uk
Subject: A new Local Plan Publication Draft response form has been submitted

A new Local Plan Publication Draft response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

Web ref: 105185

Date submitted: 04/04/2018

Time submitted: 18:20:32

Thank you for submitting your Local Plan Publication Draft response form (ref: 105185, on 04/04/2018 at 18:20:32) to City of York Council.

The following is a copy of the details you included.

About your comments

Whose views on the Local Plan publication draft do your comments represent? Own comments

About you/the organisation/individual/group you're representing

Please complete in full; in order for the Inspector to consider your representations names and postal addresses must be provided.

Title: Mr

Forename: Giles

Surname: Carter

Name of the organisation/individual/group you're representing:

Address (building name/number and street): [REDACTED]

Address (area): [REDACTED]

Address (town): [REDACTED]

Postcode: [REDACTED]

Email address: [REDACTED]

Telephone number: [REDACTED]

What are your comments about

You may complete this form more than once - you should **submit a separate form for each issue to you want to raise** relating to the Local Plan 'publication draft', the Policies Map or the Sustainability Appraisal/Strategic Environmental Assessment.

Which document do your comments relate to? Local Plan Publication Draft

Legal compliance of the document

'Legally compliant' means asking whether or not the plan has been prepared in line with statutory regulations, the duty to cooperate, and legal procedural requirements such as the Sustainability Appraisal. Details of how the plan has been prepared are set out in the Consultation Statements and Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan.

Do you consider the document is legally compliant? Yes, I consider the document to be legally compliant

Do you consider the document to comply with the Duty to Cooperate? YesCompliestoDuty

Please justify why you do/do not consider the document to be legally compliant or in compliance with the Duty to Cooperate:

Y

Whether the document is/is not 'sound'

Deciding whether you consider the document to be 'sound' means considering whether it's 'fit for purpose' and 'showing good judgement'. The inspector will use the public examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness':

- **positively prepared** - prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from

neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development

- **justified** –the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- **effective** – deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- **consistent with national policy** – enables the delivery of sustainable development in accordance with the policies in the framework

Do you consider the document to be 'sound'? Yes, I consider the document to be sound

Please indicate which of four 'tests of soundness' relate to your answer:

[Response - SoundnessYES]

Please give reasons for your answer(s):

y

Which part of the document do your comments on 'soundness' relate to? Please provide a paragraph number, a policy reference or a site reference: y

Necessary changes

You can suggest any change(s) you consider necessary to make the Local Plan legally compliant or sound - you'll need to say why the modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Your suggestion should cover succinctly all the information, evidence and supporting information necessary to support/justify it. There will not normally be a subsequent opportunity to make further representations; these would only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

SP1 – The Stables, Elvington lane, - 3 permanent travelling showman plots

The following are objective comments on the planning issues and are no reflection on the personalities involved.

As you are aware, two previous applications in March 2010 and September 2010 for Change of use of buildings/land for travelling showpeople's site for one family, were previously refused by City Of York Council.

According to your own records, there were several reasons for refusal which included:

- The proposal is considered to constitute inappropriate development with the green belt and would therefore conflict with national advice in Planning Policy Guidance Note 2 (Green Belts) and Policy GB1 (Development in the Green Belt) of the City of York Draft Local Plan.
- It is considered that the proposal would erode the open, rural character of the site and have a significant visual impact on the character and appearance of the area, contrary to national advice in Planning Policy Statement (PPS)1 (Delivering Sustainable Development), PPS7 (Sustainable Development in Rural areas) and policies GP1 (Design) and H16 (Residential Sites for Gypsies/Travellers) of the City of York Draft Local Plan.

I am not aware of any circumstances which have changed.

As you are aware, the site previously had temporary permission for 5 years for a single

occupancy, which terminated in June 2016. After this the legally binding Planning Inspectorate decision ruled that the site would need to be returned to Green Belt. Therefore, inclusion of this site in the draft local plan and extension of the temporary permission to 2020 is in clear conflict with this decision already made by the Planning Inspectorate.

There are significant traffic and road safety issues which must be considered. The site is located on the corner of a busy road (the B1228) providing the principal access route for several villages. Sight lines are poor and this makes access onto & off the site difficult & dangerous - especially for large vehicles towing caravans & trailers. Turning traffic would regularly interfere with the free flow of traffic on the B1228 thereby creating a significant traffic hazard.

The existing stables building is clearly of inadequate size for safe storage of the large items of equipment associated with this type of land use. Erection of more suitable larger buildings would clearly be inappropriate in this green belt location in the future and would not receive the necessary permissions.

Due to these issues, it is my view that City of York Council should remove this proposal from the draft local plan.

ST15 – Land to the West of Elvington Lane/Airfield – 3,330 dwellings

If a new garden village is required, this should be constructed in a location which preserves significant greenbelt to all 4 sides, in keeping with the character of other villages surrounding York. Currently, the proposed location of this development including part of the Airfield will mean the proposed development in it's current location would merely become an extension of Elvington, spoiling the character of this historic village.

The full-length of Elvington Airfield runway should be retained for historical reasons and to support the existing recreational and tourism activities that currently take place, which are an economic strategic priority for York.

If ST15 is to be built, it should be much further north (to retain the airfield runway) and further west (to minimise the distance from the A64 – its principal access point). The A64 clearly separates the site from Heslington and therefore, as it is proposed, ST15 is too close to the villages of Elvington and Wheldrake and is disproportionate in size to them. It would dominate the area, when it could and should be sited further away.

We agree with the council commentary that any new development of this nature should include strategic plans for road transport to include a dedicated A64 junction and to ensure that the B1228 Elvington Lane and Grimston (which are already at capacity) do not become further congested. Work on a new A64 junction should be completed upfront, before any other development is allowed. In addition a wider transport policy to include public transport and cycling would be required, which not only supported the new development but also created opportunities to benefit Elvington and Wheldrake which currently suffer from chronically poor services of these types. The plans for dedicated cycling facilities are welcomed and these should be extended to serve both Elvington and Wheldrake.

The development should also include suitable infrastructure (doctors, schools, public transport shops) as the existing infrastructure is already at capacity.

If you're seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination? No hearing sessions

If you select 'No', your suggestions will still be considered by the independent planning inspector by way of written representations.

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt, to hear those who want to participate at the hearing sessions.



[REDACTED]

From: Alison Scott [REDACTED]
Sent: 04 April 2018 18:20
To: localplan@york.gov.uk
Subject: Local Plan Consultation Response
Attachments: Response1.pdf; Response2.pdf; Response3.pdf; Response4.pdf; Response5.pdf; Local Plan objection Haxby.docx; Local Plan objection Wigginton.docx

Please find attached response form and attachments.

Sincerely
Alison Scott

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information


To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Ms	
First Name	Alison	
Last Name	Scott	
Organisation (where relevant)		
Representing (if applicable)		
Address – line 1		
Address – line 2		
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		
E-mail Address		
Telephone Number		

Part B - Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes

No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph
no.

All of it

Policy
Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Please see attached.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

PLEASE SEE ATTACHED

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation



Yes, I wish to appear at the examination



If you have selected No, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature

Date

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

I believe the Local Plan to be unsound on the following grounds:

1. Haxby has already suffered massive development and can take no more. Any new development on this scale should be on a completely new site away from existing suburbs and from York itself, with its own new roads, sewers, shops, schools and medical centre.
2. There are various references to developers “working with” and “working towards” various goals. We all know that this is just not going to happen. Developers cannot be trusted to build affordable housing, let alone roads, drains, parks, schools, shops and medical centres. City of York Council’s complete inability to enforce planning conditions can be seen in the Hungate development, which was supposed to have a riverside walk with trees. This does not exist. Neither developers nor the council can be relied on to keep to agreed plans, let alone the woolly suggestions in the consultation document. I understand that the Council’s Planning Enforcement Department is already overstretched, which tells me that developers are already breaking the rules in the knowledge that there will be no enforcement. The only way any development can work is if developers are legally compelled to build new amenities on pain of massive fines, and if the Council provides adequate enforcement.
3. There are only three roads connecting Haxby and the planned new development with the A64, A1237 and York itself. None of these roads can take any more traffic. No amount of new junctions can change this fact. Traffic on York Road, Strensall Road and the B1363 is already at a standstill during rush hours, with the resultant drop in air quality and increased danger to cyclists and pedestrians. The existing “cycle lanes” on York Road are far too narrow and there are none at all on Strensall Road and the B1363, which are extremely dangerous for cyclists, especially schoolchildren.
4. We have been promised dualling of the A1237 and A64 for decades. No development should even be considered until this has **happened**. Even then, new developments at Haxby, Wigginton and Rawcliffe would return the traffic on the A1237 to its present levels. New businesses are already being deterred from investing in commercial spaces along the ring road. The A1237 should be dualled **without** any new developments in surrounding areas. Only then would the traffic return to reasonable levels.
5. A new station at Haxby, even if one is ever built (again we have been promised it for decades) is unlikely to help much as people would want parking space at the station, further clogging the already overburdened Towthorpe Road. Further, I understand that new rail timetables will mean extra trains along the York to Scarborough line, leading to more frequent closure of the crossing gates on both York Road and Towthorpe Road, thus holding up traffic even further.
6. Access roads to and from any new development would feed into Usher Lane and Moor Lane, which are country lanes and which already have increasing traffic at increasing speeds. The junction of Usher Lane with Station Road in particular is already a problem area, with many parked cars along both roads (see below). It is no good simply prohibiting parking along these roads without providing alternative

parking nearby. The thought of years of construction traffic through these junctions and along the village street is truly horrific.

7. There are already parking problems in Haxby Village which the new car park on the sports field has done nothing to address as it is too far from the shops. Unless more shops are built in a different place, any development will only worsen the problem. Haxby Village is already like an obstacle course and old people are having trouble crossing the road.

8. Construction traffic through Haxby village would be a nightmare. Roads in the area are already in an appalling state and would be made even worse.

9. Connecting a new development into the existing public sewerage system is not viable. The existing sewers are already overloaded and require urgent renewal. Properties in the Usher Lane area already have extremely high levels of standing water, and properties on Towthorpe Road had their gardens and garages flooded on Boxing Day 2015 as drains could not cope. In my own area, off West Nooks, the water table is so high that there is standing water in many places throughout the winter. Discharging more domestic water into the Foss/Ouse system is criminally negligent, not to mention that any new development would lead to the concreting over of fields where the water table is already high.

10. There is currently a two-week wait for non-emergency GP appointments at the Haxby & Wigginton medical centre, and I am told by a GP that they cannot take on any more doctors because the centre cannot physically be expanded any more. Any development at all can only exacerbate the situation.

I am writing this in the full knowledge that my objections will be completely ignored, as have been all the objections to the previous Local Plans over the last several years. The latest incarnation of the plan takes into account none of our previous objections and it is clear that the City Council cares absolutely nothing for the opinions of its taxpayers. This "consultation" is a cynical tick-box exercise which is worth nothing.

The Council could of course prove me wrong by abolishing this whole development. I live in hope.

I believe the Local Plan to be unsound on the following grounds:

1. The planned new development is apparently to be accessed from the A1237 and B1363. Neither of these roads can take any more traffic. The B1363 is already at a standstill during rush hours, and the proposed new development would see 1500 extra cars feeding into these choked roads, with the resultant drop in air quality and increased danger to cyclists and pedestrians.
2. We have been promised dualling of the A1237 for decades. No development should even be considered until this has **happened**. Even then, new developments at Haxby, Wigginton and Rawcliffe would return the traffic on the A1237 to its present levels. New businesses are already being deterred from investing in commercial spaces along the ring road. The A1237 should be dualled **without** any new developments in surrounding areas. Only then would the traffic return to reasonable levels.
3. With the A1237 at a standstill during morning rush hour and from 3.30 pm onwards, additional construction traffic along it and/or the feeder roads would be a nightmare. Far from attracting people and businesses into the area, this would discourage inward investment as well as driving local shoppers out of the York area altogether.
4. I have seen no provision for a new secondary school to serve the development. I understand that local schools, both primary and secondary, are nearly at full capacity. Even if the development triggered the building of a new primary school, pupils would have to access the existing secondary schools by car or cycle, increasing traffic still further.
5. Absolutely no development should take place until York City Council is in a position to enforce the planning provisions. Otherwise, developers will build exactly what they like. There will be no green spaces, cycle lanes, overbridge, primary school, local shops or any of the other woolly provisions in the Plan. Any non-compliance with these conditions must be enforceable with massive fines and the Planning Enforcement Department should be strengthened accordingly.

From: jadu-www@rsvm121.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 04 April 2018 18:32
To: localplan@york.gov.uk
Subject: A new Local Plan Publication Draft response form has been submitted

A new Local Plan Publication Draft response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

Web ref: 105186

Date submitted: 04/04/2018

Time submitted: 18:31:47

Thank you for submitting your Local Plan Publication Draft response form (ref: 105186, on 04/04/2018 at 18:31:47) to City of York Council.

The following is a copy of the details you included.

About your comments

Whose views on the Local Plan publication draft do your comments represent? Own comments

About you/the organisation/individual/group you're representing

Please complete in full; in order for the Inspector to consider your representations names and postal addresses must be provided.

Title: Dr

Forename: John

Surname: Iredale

Name of the organisation/individual/group you're representing:

Address (building name/number and street): [REDACTED]

Address (area): [REDACTED]

Address (town): [REDACTED]

Postcode: [REDACTED]

Email address: [REDACTED]

Telephone number: [REDACTED]

What are your comments about

You may complete this form more than once - you should **submit a separate form for each issue to you want to raise** relating to the Local Plan 'publication draft', the Policies Map or the Sustainability Appraisal/Strategic Environmental Assessment.

Which document do your comments relate to? Local Plan Publication Draft

Legal compliance of the document

'Legally compliant' means asking whether or not the plan has been prepared in line with statutory regulations, the duty to cooperate, and legal procedural requirements such as the Sustainability Appraisal. Details of how the plan has been prepared are set out in the Consultation Statements and Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan.

Do you consider the document is legally compliant? No, I do not consider the document to be legally compliant

Do you consider the document to comply with the Duty to Cooperate? NoCompliestoDuty

Please justify why you do/do not consider the document to be legally compliant or in compliance with the Duty to Cooperate:

With reference to the proposal to allow English Heritage to build a visitors center on part of the Clifford's tower site, I am of the opinion that this decision was made by CYC with inadequate public consultation. A very large number of residents on being informed of the risks of archaeological damage to this sensitive site and the size and obtrusive nature of the propose building believe that this development is inappropriate and should be cancelled. It would also appear that there have been procedural errors in CYC 's proposal to dispose of publicly owned land.

Whether the document is/is not 'sound'

Deciding whether you consider the document to be 'sound' means considering whether it's 'fit for purpose' and 'showing good judgement'. The inspector will use the public examination process to

explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness':

- **positively prepared** - prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development
- **justified** –the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- **effective** – deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- **consistent with national policy** – enables the delivery of sustainable development in accordance with the policies in the framework

Do you consider the document to be 'sound'? No, I do not consider the document to be sound

Please indicate which of four 'tests of soundness' relate to your answer:

[Response - SoundnessYES] not positively prepared

Please give reasons for your answer(s):

I believe errors have been made in regard to the Clifford's tower proposals and that public consultation was inadequate.

Which part of the document do your comments on 'soundness' relate to? Please provide a paragraph number, a policy reference or a site reference: Clifford's tower

Necessary changes

You can suggest any change(s) you consider necessary to make the Local Plan legally compliant or sound - you'll need to say why the modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Your suggestion should cover succinctly all the information, evidence and supporting information necessary to support/justify it. There will not normally be a subsequent opportunity to make further representations; these would only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

That in the light of the concerns or residents the Clifford's tower development is withdrawn.

If you're seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination? No hearing sessions

If you select 'No', your suggestions will still be considered by the independent planning inspector by way of written representations.

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt, to hear those who want to participate at the hearing sessions.

[REDACTED]

From: Christopher Tunnell [REDACTED]
Sent: 04 April 2018 18:31
To: localplan@york.gov.uk
Cc: Jayshree Patel; 'Jones, Christopher (GVA)'; Hannah Smith; Nicole Harrison; Sowmya Parthasarathy
Subject: Reg 19 Consultation - York Central Partnership Response
Attachments: T8 form as issued 04-04-2018.pdf; T1 form as issued 04-04-18.pdf; SS4 form as issued 04-04-18.pdf; H1 form issued YORK 4-04-2018.pdf; york reg 19 covering letter final 4-4-18.pdf

Dear Sir/Madam

Please find attached a representation to the Publication Draft Local Plan on behalf of York Central Partnership. I would be grateful if you could confirm receipt of this email and attachment by reply.

Regards

Chris

Christopher Tunnell
Director, UK Planning Group Leader

[REDACTED]

Your ref 251869-00
Our ref [Click here to enter text \(or use single space if not reqd\).](#)
File ref

ARUP

Local Plan
City of York Council
West Offices
Station Rise
York
YO1 6GA

Admiral House Rose Wharf
78 East Street
Leeds LS9 8EE
United Kingdom
t +44 113 242 8498
f +44 113 242 8573
Christopher.tunnell@arup.com
www.arup.com

4 April 2018

Dear Sir/Madam

City of York Local Plan Publication Draft 2018 Consultation Response Representations on Behalf of York Central Partnership

Please find attached the forms giving the detailed policy responses from the York Central Partnership to the Regulation 19 Consultation on the York Local Plan.

YCP, which comprises Homes England, City of York Council, Network Rail and the National Railway Museum, represent the promoting body for the land to the west of York Railway Station commonly known as the 'teardrop site'. Land within the control of YCP represents the majority of the York Central Site (Strategic Site ST5). YCP would wish to provide support for the allocation of York Central, and the overall direction of the Draft Plan.

As you would expect the Partnership therefore strongly supports the allocation of York Central as reflected in Policies H1 and SS4. The Partnership also confirms that it anticipates delivering over 1700 homes, of which at least 1500 will be in the Plan period, and a total of approximately 100,000 square metres of commercial uses. However, as you will note from the forms submitted the Partnership also has on-going concerns for the soundness of policies T1 and T8 as currently drafted.

More generally on site capacity, I would note that York Central could be capable of accommodating up to 2400 residential units based on the indicative master planning work concluded in late 2017 and a higher figure of up to 2500 units may even be achieved. I have appended the possible delivery trajectory and plot schedules that emerged from this work.

The Partnership is currently progressing further engagement, master-planning work and assessment and intends to make an outline planning application in 2018 accompanied by a detailed application for the new western access road. Funding for the delivery of this critical infrastructure has been secured from West Yorkshire Combined Authority Transport Fund to bring forward development of this significant brownfield site over the next 15 – 20 years commencing 2019/2020. The work is informed by viability advice from Savills and my colleagues from Arup are progressing work on the Transport Assessment and Environmental Impact Assessment.

The proposals for York Central also include work on the detailed design of the new Western Access, as well the provision of a new park, other open spaces and a new public square linking a new western entrance to the station to the National Railway Museum. There is also provision for new pedestrian and cycling access, and the upgrade of the current road and pedestrian tunnels at the eastern end of Leeman Road. The proposals have been subject to an on-going series of pre applications discussions with relevant Council officers including, but not limited to development management, transport, design and architecture, landscape and archaeology, which have been progressing since last year.

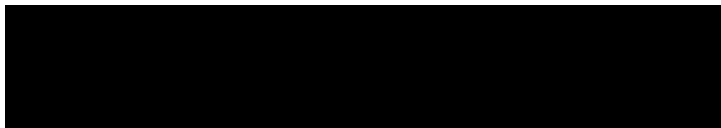
We are also working closely with Historic England (HE) and officers from HE now attend the pre-application meetings with the Planning Authority. We are also working with other statutory bodies including the Environment Agency and Natural England on relevant issues.

As you may also have noticed a six-week public consultation exercise is also in progress around the draft masterplan and this is the final stage of a comprehensive 3 stage engagement strategy. Following the conclusion of this exercise the Partnership will be in a position to finalise its proposals.

This progress means that, in line with the practice established for most recent Plan Examinations, YCP can provide a delivery plan for the site if required, in advance of Examination Hearings. This could be similar to the trajectory that we provided to you in January 2018 (appended), but could reflect our updated work and changes made in the light of public consultation setting out the finalised delivery trajectory for the site and the next steps to delivery. At this stage we are not sure how the planning authority is intending to approach the issue of justifying housing trajectories generally, but we would be pleased to undertake this as a Statement of Common Ground with the Planning Authority in line with typical recent practice elsewhere. We will also respond to Inspector's written matters, questions and issues in advance of Examination, as appropriate.

We look forward to liaising with you over the delivery strategy in the next few weeks

Yours faithfully



Christopher Tunnell
Director, UK Group Leader Planning

**York Central
Trajectory for Local Plan, as at 8 January 2018**

	Land within YCP Control Only	Land York Central Allocation (YCP Land, York Yard South & North of Leeman Road)
Year	Unit Nos (1,703)	Unit Nos (2,387)
Yr1 - 2019/20	45	45
Yr2 - 2020/21	105	107
Yr3 - 2021/22	105	107
Yr4 - 2022/23	105	107
Yr5 - 2023/24	105	107
Yr6 - 2024/25	105	119
Yr7 - 2025/26	105	119
Yr8 - 2026/27	105	119
Yr9 - 2027/28	120	119
Yr10 - 2028/29	120	143
Yr11 - 2029/30	120	143
Yr12 - 2030/31	120	143
Yr13 - 2031/32	120	143
Yr14 - 2032/33	120	143
Total	1500	1,664
Yr15 – 2033/34	100	143
Yr16 – 2034/35	103	145
Yr17 – 2035/36	0	145
Yr18 – 2036/37	0	145
Yr19 – 2037/38	0	145
Total	1,703	2,387

Local Plan Numbers – York Central*

A	B	C	D	E	F	G	H	I	J	K
Plot	Size ha	Offices sqm	Retail sqm	Community sqm	Hotel Sqm	Dwellings (on CYP Controlled Land)	Dwellings (on Non-CYP Controlled Land)	Dwellings Total (G+H)	Dwellings for LP Trajectory	Notes
B	0.48					57		57	57	
C	-	24,495								
D	0.99					207		207	207	
E	1.7	20,980	2,875			256		256	256	Mixed use plot
F	-	52,343			6,477					
G	0.54	2,082				56		56	56	Mixed use plot
H	1					169		169	169	
J	2					311	231	542	311	Plots J1a, J2a, J3a, J4a & J5 only YCP
K	1.83			4,533		34		34	34	
L	1.47					186		186	186	
M	3.04					68	267	335	68	Plots M6a & M7a YCP only YCP
N	1.21					268		268	268	
P	1.99					91	186	277	91	Plots P8a, P8b & P8c only are YCP
Total		99,900	2,875	4,533	6,477	1,703	684	2,387	1,703	

*As at 8 January 2018, subject to revision in the light of further master planning and public consultation



**City of York Local Plan
Publication Draft 2018
Consultation response form
21 February – 4 April 2018**

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Ms	Mr
First Name	Jayshree	Christopher
Last Name	Patel	Tunnell
Organisation (where relevant)	[REDACTED]	Arup
Representing (if applicable)		York Central Partnership
Address – line 1		Admiral House
Address – line 2		Rose Wharf
Address – line 3		78 East Street
Address – line 4		Leeds
Address – line 5		
Postcode		LS9 8EE
E-mail Address		christopher.tunnell@arup.com
Telephone Number		0207 755 3959

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

- Online via our website www.york.gov.uk/localplan.
- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

York Central Partnership considers that the Policy H1 is Legally Compliant and has been prepared in accordance with the Duty to Cooperate.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared Justified
Effective Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph
no.Policy
Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

York Central Partnership (YCP) consider that Policy H1 is sound. York Central is represents a significant brownfield development opportunity in the heart of York. The site is well located in terms of access to York Railway Station and the City Centre to enable its future residents to benefit from all the opportunities York can offer. This is in addition to the ability to create a high quality, sustainable new neighbourhood on the York Central site itself.

Table 5.1 of Policy H1 estimates that York Central can yield over 1700 dwellings and will deliver at least 1500 homes over the lifetime of the plan. YCP concur that this is possible for the following reasons:

- Master planning, viability and other assessments have confirmed the proposal can deliver over 1700 homes, of which at least 1500 will be in the Plan period. The work to date suggests that York Central is capable of accommodating between 1700 – 2500 residential units based on indicative master planning work.
- York Central is a Home Zone and therefore there is an immediate drive to ensure that dwellings are delivered on the site as soon as possible (subject to the award of Planning Permission).
- There is capacity within the existing highway network and access routes into the site to enable a first phase of residential development of circa 400 homes to be delivered as soon as possible (subject to the award of planning permission). These homes can be constructed concurrently with the new access route, which in turns allows subsequent phases of development to be delivered.

The Partnership is currently progressing further engagement, master-planning work and assessment and intends to make an outline planning application in 2018 accompanied by a detailed application for the new western access road. Funding for the delivery of this critical infrastructure has been secured from West Yorkshire Combined Authority Transport Fund to bring forward development of this significant brownfield site over the next 15 – 20 years commencing 2019/2020. YCP is also likely to be in a position to agree and provide a delivery plan for the site, including an updated trajectory with the LPA, in advance of Examination hearings, and will be able to respond to Inspector's questions on York's land supply position.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

N/A

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Given the importance of the York central site to housing supply, the York Central Partnership would wish to be able to participate in any Examination sessions concerned with the Housing supply position and/or process of strategic site selection and alternatives.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.



Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature

Date

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012



**City of York Local Plan
Publication Draft 2018
Consultation response form
21 February – 4 April 2018**

OFFICE USE ONLY:

ID reference:

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To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Ms	Mr
First Name	Jayshree	Christopher
Last Name	Patel	Tunnell
Organisation (where relevant)	Homes England	Arup
Representing (if applicable)	York Central Partnership	York Central Partnership
Address – line 1	[REDACTED]	Admiral House
Address – line 2		Rose Wharf
Address – line 3		78 East Street
Address – line 4		Leeds
Address – line 5		
Postcode		LS9 8EE
E-mail Address	J	Christopher.tunnell@arup.com
Telephone Number		0207 755 3959

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

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What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

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Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

York Central Partnership considers that the policy SS4 is Legally Compliant and has been prepared in accordance with the Duty to Cooperate.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared **Justified**
Effective **Consistent with national policy**

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph
no.

Policy
Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

York Central Partnership (YCP) consider that Policy SS4 is sound. York Central Partnership supports the allocation and identification of York Central as a Strategic Site (ST5) and the range of and scale of uses proposed by Policy SS4 for York Central.

York Central represents a significant brownfield development opportunity in the heart of York and a partnership of public sector bodies are taking a joint approach to progressing the development of their land holdings and providing the necessary infrastructure to ensure that the site can be developed to its full potential. The York Central Partnership comprises Homes England, City of York Council, Network Rail and the National Railway Museum, who together represent the majority of the York Central Site (Strategic Allocation ST5). YCP is committed to bringing forward a high quality and sustainable development on this brownfield site in the centre of York.

The Partnership also confirms that it anticipates delivering over 1700 homes, of which at least 1500 will be in the Plan period, and a total of approximately 100,000 square metres of commercial uses. The Partnership is currently progressing further engagement, master-planning work and assessment and intends to make an outline planning application in 2018 accompanied by a detailed application for the access road. Funding for the delivery of this critical infrastructure has been secured from West Yorkshire Combined Authority Transport Fund to bring forward development of this significant brownfield site over the next 15 – 20 years commencing 2019/2020. YCP will also be likely to be in a position to agree and provide a delivery plan for the site, including trajectory with the LPA, in advance of Examination hearings, and will be able to respond to Inspector's questions on York's land supply position.

See also the Partnership's response to Policy H1 which covers housing provision- related aspects.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

N/A

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Given the importance of the York central site to the plan, the York Central Partnership would wish to be able to participate in any Examination sessions concerned with the strategic allocations and/or process of strategic site selection and alternatives.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

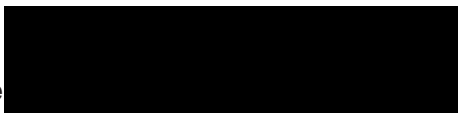
We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

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If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature



Date

04/04/2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012



**City of York Local Plan
Publication Draft 2018
Consultation response form
21 February – 4 April 2018**

OFFICE USE ONLY:

ID reference:

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.



This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

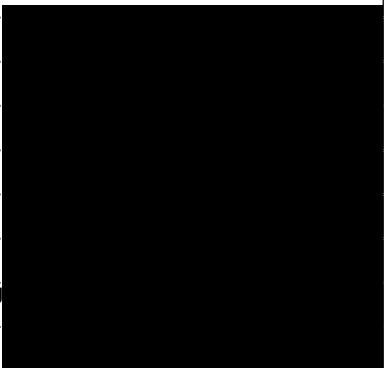
To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Ms	Mr
First Name	Jayshree	Christopher
Last Name	Patel	Tunnell
Organisation (where relevant)	Homes England	Arup
Representing (if applicable)	York Central Partnership	York Central Partnership
Address – line 1		Admiral House
Address – line 2		Rose Wharf
Address – line 3		78 East Street
Address – line 4		Leeds
Address – line 5		
Postcode		LS9 8EE
E-mail Address		christopher.tunnell@arup.com
Telephone Number		0207 755 3959

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

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What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

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Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

York Central Partnership considers that the Policy T1 is Legally Compliant and has been prepared in accordance with the Duty to Cooperate.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

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5.(1) Do you consider the document is Sound?
 Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared **Justified**
 Effective Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no. Policy Ref. **T1** Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

York Central Partnership (YCP) supports Policy T1 'Sustainable Access' in principle, but considered elements of the policy are unsound, extracted below:

The policy states that *'Where development is to be supported by frequent high quality public transport linking them to York City Centre or other key destination, developers will be required to ensure the provision of such new services or enhanced existing services as necessary from first occupation of the development for a period of up to 10 years, or five years after last occupation, whichever comes sooner'*

The York Central site is such a site where this proposed policy would apply, as it is a development that would be supported by public transport to link it to York City Centre. York Central Partnership are committed to ensuring that the development benefits from high quality walking, cycling and public transport routes and access. However, the ability provide high quality public transport from **first occupation** may be dependent upon the delivery of the new access route first, which will be built whilst the first homes are also being built and potentially occupied.

In addition, more generally, the provision of public transport services from first occupation (or five years after last occupation, whichever is sooner) may not be viable for developments that build out over the lifetime of the plan and beyond (i.e. .15 years +).

It is therefore considered that the approach to this policy does not does not allow for reasonable alternatives where the landowner / developer supports the provision of public transport provision, but needs an agreed scale of occupancy before provision is viable.

Commented [CJ081]: I still question whether this policy is relevant to YC. The scheme is not dependent on new public transport (only diversion of existing services as per new road alignment and new bus stops). Agree that we can make a representation but perhaps we need to make clear the above point also.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

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After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Policy T1 currently states that:

'Where development is to be supported by frequent high quality public transport linking them to York City Centre or other key destination, developers will be required to ensure the provision of such new services or enhanced existing services as necessary from first occupation of the development for a period of up to 10 years, or five years after last occupation, whichever comes sooner'

It is recommended that this policy is amended as follows:

*'Where development is to be supported by frequent high quality public transport linking them to York City Centre or other key destination, developers will be required to ensure the provision of such new services or enhanced existing services as necessary, **from the occupation of an agreed number of dwellings informed by a Transport Assessment, the number of households and requirements of the route/ operator.***

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

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Signature

Date

04/04/2018

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**City of York Local Plan
Publication Draft 2018
Consultation response form
21 February – 4 April 2018**

OFFICE USE ONLY:

ID reference:

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Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)	
Title	Ms	Mr	
First Name	Jayshree	Christopher	
Last Name	Patel	Tunnell	
Organisation (where relevant)	Homes England	Arup	
Representing (if applicable)	York Central Partnership	York Central Partnership	
Address – line 1	[REDACTED]	Admiral House	
Address – line 2		Rose Wharf	
Address – line 3		78 East Street	
Address – line 4		Leeds	
Address – line 5			
Postcode		LS9 8EE	
E-mail Address		J	christopher.tunnell@arup.com
Telephone Number			0207 755 3959

Guidance note

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Do I need to attend the Public Examination?

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- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

York Central Partnership considers that the Policy T8 is Legally Compliant and has been prepared in accordance with the Duty to Cooperate.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes **No**

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared **Justified**

Effective **Consistent with national policy**

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Policy Ref. **T8**

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

York Central Partnership (YCP) supports Policy T8 'Demand Management' in principle, but considered elements of the policy are unsound, extracted below:

The policy states that *'Development that increases the number of long-stay (i.e more than 4 hours parking) car parking spaces in and around the city centre will not be permitted'*

The York Central site is well located to include a high level of provision for sustainable travel. However it will also include parking provision related to the existing railway station and National Railway Museum and the proposed commercial elements. All of which protects existing jobs and creates a significant number of new jobs and visitors to the area.

Whilst it is anticipated that much of the travel to the development will be sustainable, using the excellent public transport availability and pedestrian and cycle links with the remainder of the city, there will inevitably be some workers and visitors who will travel by car and hence will require long-stay parking provision. Whilst every effort will be made to minimise the level of parking in the future on York Central, it is an imperative an overly restrictive policy on long-stay parking does not reduce the attractiveness of the commercial offer on York Central to potential occupants.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Policy T8 currently states that:

~~'Development that increases the number of long stay (i.e more than 4 hours parking) car parking spaces in and around the city centre will not be permitted'.~~

This should be replaced with:

'Development in and around the city centre should prioritise the provision of short stay parking over long stay parking.'

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

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Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

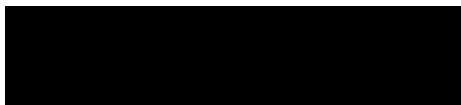
We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

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Signatur



Date

04/04/2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

[REDACTED]

From: Sandra [REDACTED]
Sent: 04 April 2018 19:06
To: localplan@york.gov.uk
Subject: FW: York Local Plan

H39. Extension to Becksid.

I, Sandra Atkinson [REDACTED]
wish to object to this proposal on the grounds of soundness for the following reasons:

H39 was previously deemed by the Planning Inspector to serve as Green Belt purposes. Furthermore, the extra traffic that would be generated from the 32 houses would adversely impact on the existing residents of Becksid.

I would suggest it is replaced by the previous submission: H26. Dauby Lane.
This would have the beneficial effect of connecting the two residential areas of the village.

SP1. The Stables. Travelling Showpersons Site.

I, Sandra Atkinson [REDACTED]
wish to object to this proposal on the grounds of soundness as the previous Planning Inspector's report was that it granted for 5 years use only, which has now expired. CYC should abide by that Planning Inspector's analysis and decision.

ST15. Whinthorpe/The Airfield.

I, Sandra Atkinson [REDACTED]
wish to object to this proposal on the grounds of soundness for the following reasons:

The first version of the Local Plan included ST15 as 'Whinthorpe'. This was significantly better sited than the current proposals, being much closer to the A64 – its principal access point. This allowed for the retention of the airfield runway and lessened the adverse impact on Elvington and Wheldrake. The A64 clearly separates the site from Heslington so the visual and auditory impact on that village would be minimal. As it is proposed, ST15 being the size of Pocklington is far too close to the villages of Elvington and Wheldrake as well as being disproportionate in size to them. It would dominate the area, when it could and should be sited further away.

There has been no provision regarding information of infrastructure, in particular the transport links to the A64 and B1228 but also the ability of drainage to cope with not only the extra housing but the loss of a natural soakaway. No mention has been made of extra schools, churches, shops etc to cope with all the extra residents. The effect on the surrounding countryside, and the neighbouring villages of Elvington and Wheldrake, will be vast.

Futhermore it is thought absurd and economically ill-advised to destroy the airfield runway in the way proposed. Elvington Airfield is an important part of York's history and the full-length runway should be retained for historical reasons and future strategic need, along with the existing recreational activities that currently take place. Once destroyed it can never be recreated. Furthermore the airfield holds almost all of the UK's land speed records and is itself a major asset for tourism, which is a stated economic strategic priority for York. Additionally the adverse impact on the internationally respected Yorkshire Air Museum and Allied Air Forces Memorial would further damage tourism and indeed the reputation of York itself. The airfield and the Air Museum together currently contribute significantly to the York experience and revenues. Retaining the airfield also keeps open the option of a commercial aerodrome should this be deemed desirable in the future.

Notwithstanding this, the airfield is Green Belt and a site of importance to nature. The adverse ecological impact of ST15 would be less if it were sited north as originally proposed.

In conclusion, ST15 as it was originally proposed alongside the A64 and adjacent to the proposed new junction would not cause any of the above issues.

Thank you for your attention in the above matters of high importance.

Sandra Atkinson

From: Andrew McGuinness [REDACTED]
Sent: 04 April 2018 19:20
To: localplan@york.gov.uk
Subject: Local Plan Consultation Response from York QBP
Attachments: Comments_form_FINAL QBPv2.docx; Operator response to Local Plan March 18 final.docx

Importance: High

Dear Sirs,

Please find attached, a response to the Local Plan consultation on behalf of bus operators serving York as part of the York Quality Bus Partnership.

The response has been collated and submitted by the Confederation of Passenger Transport (CPT), the trade body for UK bus and coach operators.

Please respond to me directly should there be any questions or clarifications arising from this response.

Kind Regards

Andrew

Andrew McGuinness
Regional Manager, Northern & Yorkshire Regions, CPT UK

M: [REDACTED] **W:** www.cpt-uk.org

Legal Disclaimer: Any information in this email is for general guidance only and represents the writer's understanding of certain aspects of law, statistical information and industry operational practice at the time of sending. The writer, CPT, its officers, servants and agents do not accept any responsibility for loss or damage (including economic loss) arising from any mis-statement or error, nor from the use of, or reliance on, this material. This email is not intended to provide legal advice or professional counselling.

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information


To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Andrew	
Last Name	McGuinness	
Organisation (where relevant)	Confederation of Passenger Transport	
Representing (if applicable)	York Quality Bus Partnership	
Address – line 1		
Address – line 2		
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		
E-mail Address		
Telephone Number		

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

- Online via our website www.york.gov.uk/localplan.
- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

We are not seeking to make a judgement on this question.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes

No – more detailed work required to clarify bus issues

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Section 14

Policy Ref.

Policy T2

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

York's Quality Bus Partnership welcome the emphasis the Plan puts on bus as a key delivery mechanism for the Local Plan, but feel that the 15% mode share figure for bus travel to and from a number of the large development sites (e.g. ST14 and ST15) is laudable but ambitious, and probably not achievable without a level of concerted investment in bus infrastructure in York above that outlined in the Plan as it stands. We're disappointed that a Supplementary Planning Document setting out an enhancement plan to York's bus infrastructure does not form part of the consultation documentation for the Local Plan. In our view, significantly more detail needs to be provided in a Supplementary Planning Document about:

- How developers, the Council and bus operators will work together to achieve the 15% mode share outlined for large development sites in the Local Plan;
- What infrastructure will be provided in the city centre, on the approaches to the city centre and on key bus routes to give buses sufficiently attractive journey times to deliver the envisaged level of mode share, and accommodate the growth in bus trip making which would stem from achieving the 15% mode share from large sites;
- How the Council will ensure that the public transport facilities within sites, linking new sites to the existing urban area (e.g. the underpass from ST14 and bridge from ST15), and revenue support for new bus services, will be provided by developers as part of their planning obligations.

Operators also have a concern that the current Plan makes insufficient provision for allocating space to land uses which could be developed as new bus depots to accommodate the additional buses which are implied by the growth of York and importance of bus services in meeting this growth.

These views are set out in a document accompanying this response.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

The Local Plan should be accompanied by a comprehensive Bus Infrastructure Plan which sets out a deliverable strategy for achieving the levels of bus use envisaged in the Local Plan. This should form a Supplementary Planning Document to the Local Plan, and bus operators should be involved in developing this document, through York's Quality Bus Partnership.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the Examination

X

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The CPT would be happy to participate in the oral examination to expand upon the points made above and in the document submitted alongside this response.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Part C - How we will use your Personal Information

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Signature

Date

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

York Bus Operators' response to the draft York Local Plan, April 2018

This paper sets out a collective response to the Local Plan consultation from York's bus operators. It has been submitted by the operators in the York Quality Bus Partnership (QBP), which acts as a co-ordinating body for all York's bus operators, and follows discussion of the Local Plan at the QBP meeting on 14th March 2018. This note has been prepared by the Confederation for Passenger Transport (CPT), acting as a co-ordinator for all York's bus operators, all of whom are members of CPT. The CPT has also made a submission to the Local Plan consultation, and some individual operators may also have made submissions. It should be noted that most of the bus operators on the QBP primarily operate local bus services, although some of the operators also provide school services and one operator is primarily a coach operator, but provides education services in York and operates large numbers of coach services in and around York, including private hire, excursions and rail replacement services, and these use the various facilities for coaches around York..

This paper considers the following areas of the Local Plan:

- Mode share and market penetration for bus services in York
- Infrastructure to support bus services in York generally
- Planning services within the new developments
- Specific feedback on individual development sites
- Availability of land in York for use as bus depots

The feedback here was collated around a discussion paper, attached at the end of this paper of this paper, written to highlight key discussion points and provoke debate.

Mode share and market penetration for bus services in York

The 15% mode share for bus for several of the large strategic sites in York's Local Plan is ambitious, but has to be aimed for and achieved if York is serious about growing the population, and improving air quality. Otherwise the existing congestion issues would significantly worsen, affecting all residents and visitors alike. The proposed village sites can potentially support commercial bus services if the 15% modal shift target is met and exceeded. If the 15% mode share target is not achieved it is likely that bus services to the new developments would require ongoing support from the developer or local authority – consequently, we view the 15% mode share target as ambitious, but achievable (and necessary to achieve if services are to be self-supporting), and we urge CYC to work with the bus operators to ensure bus services in York are of sufficient quality to achieve the target.

Modal shift generally requires availability of a viable network; easy access to services; high frequency services; awareness and promotion; connectivity to a wider network and access to employment and facilities. It should also be noted that commuting tends to be dispersed in terms of employment location and length of commute, so bus operators operating commercial bus services will require a concentration of demand. Bus operators are keen to work with CYC towards ensuring any new bus services are well designed to meet the 15% mode share target.

Modal shift has been referenced within new developments but it is also necessary across the whole city to encourage motorists to change to bus or other sustainable forms of travel – to offset increased trip making from new residents of York. Whilst bus operators work in partnership to develop and improve the bus offer, we believe that City of York Council should further encourage modal shift to bus by introducing measures to restrict or prevent car use, specifically:

- Increased parking charges at council owned facilities;
- Introduce a workplace levy for parking spaces;
- Ensure appropriate enforcement on parking restrictions especially in new estates;
- Through the planning system, ensure section 106 contributions are spent and that the system ensures there are conditions and appropriate checks;
- Consider support for demand responsive solutions; and
- Consider congestion style road charging.

Bus services must also be reliable in order to achieve the target, in partnership with the local authority bus priority measures and traffic modelling on key commuting corridors should be considered for each proposed development site.

In addition, home to school journeys by car also create considerable congestion and there is a need to renew pressure in the area of school travel planning. Discouragement of home to school journeys by car could also be done using disincentives to car drivers, many of whom could car share or even cycle or walk - along with all the health benefits attached. Good practice is shown by the home to school travel patterns of Manor School, where the key journey from Acomb to School is controlled by a traffic restriction (Cameras), the numbers of pupils walking or cycling to school appears to be much higher than other schools.

These factors are crucial otherwise the modal share of 15% will be impossible (both in practical and capacity terms) to achieve. It is also important to recognise the wider geographical employment reach that homeowners in new developments have, meaning connectivity to a wider local and regional bus network is important.

The 15% target of modal shift should be achieved in partnership between operators, local authority and developers and as such there should be a stipulation in planning consent that developers should work to achieve this level of mode share.

The 15% target and wider analysis should also take into account employment centres and access to employment. Whilst Park and Ride use is welcomed and keeps cars out of York city centre, there will be a saturation point where park and ride sites themselves cause increasing congestion by attracting journeys towards a specific site. To cope with increasing demand, the addition of further park and rides sites around radial routes would be helpful.

We should stress that the achievement of a 15% mode share by bus would only be possible if extensive measures as referred to in this response are implemented before significant development takes place. The scale of the work required should not be underestimated. It is likely that compulsory purchase of land adjacent to the

highway will be required at multiple locations in order to facilitate the construction of the bus priority measures that will be needed to deliver services of a high enough quality that they will be able to deliver a 15% mode share from the new developments.

Analysis of previous modal shift targets should be carried out (if not already) to assess the success of previous targets – in York and elsewhere.

Housing Developments and supporting bus network principles

As a general principle, clustering new housing developments close to existing high frequency bus routes would be vital; new residents or homeowners to the development would have immediate access to existing services even at the early stages of the development being completed. Existing services serving or diverted to a new development could also increase in frequency as a result of passenger increase, benefiting passengers on the overall route.

With the larger clusters outside the ring road, such as ST14 Wigginton and ST15 Elvington, it would be helpful if these clusters could be placed to help sustain services to rural villages, such as Elvington. This would make the existing service much more sustainable, with potential increases in frequencies and improvement in services from these developments attracting more passengers.

To encourage this principle, the design of proposed housing developments should facilitate easy, quick pedestrian access to nearby bus stops and be free of unnecessary dead ends caused by the development itself. Access routes to bus stops should be considered at the very early stages.

Section 106 contributions from developers of estates close to high frequency services should focus upon infrastructure (bus shelters and information), initial marketing of bus services and support of less viable journeys or to enhance frequencies. It should also be noted that where new services are required, they should be developed in partnership to the point when they become commercially sustainable. Consideration should be given to developer contributions being allocated to CYC/QBP up front to ensure funding is not forgotten about and completion of schemes not enforced.

In larger 'new village' sites, consideration has to be given to supporting new services, or diversion or extension of existing or part of existing routes. Extensions or diversions to existing services that are efficient and do not add journey time for existing bus users are the ideal solution. Completely new bus routes are unlikely to be viable for any of the proposed developments. In all cases, bus should be heavily promoted from the beginning and access to nearby bus stops considered at an early stage.

Through routes (through new developments) allow for greater potential of diverting existing bus routes rather than lots of cul-de sacs. This also allows home to school transport to act effectively and efficiently.

The Chartered Institution of Highways & Transportation (CIHT) has produced guidelines that provide practical advice for planners and developers on how urban developments can be configured to bring about an increase in the level of bus use. It presents evidence to show that high quality bus services can attract the sort of high levels of use that will be required in order for the York Local Plan to be viable.

The guidance is available at <http://www.ciht.org.uk/en/document-summary/index.cfm/docid/1D79344D-A8E9-429B-A0C6710299356BCD>

Infrastructure

Modelling for the Local Plan foresees an increase in traffic of 20% which would mean an additional 7,000 AM peak hour trips. Travel times in the AM peak could increase by 30% with amount of delays increasing by 55%. This would result in buses taking longer to reach their destinations and becoming less attractive, frequencies of services could be adversely affected leading to a vicious circle of declining bus passenger numbers and increasing general traffic. FirstGroup were also of the view that an increase in trip making of this level (with an accompanying increase in bus use) would require capacity enhancements to all of their current York network, which would also require capacity enhancements at many stops in the city - particularly the interchanges in the city centre.

Longer journey times not only affect standard bus services, but also coaches and home to school transport. There are often significant delays on the A1237 in all directions. It is also particularly noticeable that on wet days the traffic is slower and congestion increases. Further increases in journey time would hinder home to school transport and make the current maximum time of 60 minutes unachievable. There are routes for example, Copmanthorpe to Manor School, that take up to 50 minutes and therefore any increased congestion and delays would lead to an exceedance of the 60 minute maximum journey time.

The historic City of York does not have the advantage of a segregated tram system or underground Metro system so bus and coach remain the mass transit solution for York. Bus priority and keeping buses moving is essential to the economic success of York, its businesses and residents. Bus priority can be provided by means of:

- Bus lanes
- Bus gates
- Priority traffic signals
- Bus only routes

We would agree that expenditure should be focused on the City Centre for bus services - but we would also agree that other large travel generators should also have some attention, such as the Hospital and York College, and that they should have some input into the solutions (such as green travel planning) and contribute financially to such solutions, thus setting a principle that those that create the congestion should contribute to the solutions. There is already the ability to introduce work place parking charges, which does not currently appear to be used to any significant extent.

On the existing road network improvements are suggested by the following introductions:

- An ambitious plan for the arterial routes in and out of York to increase capacity to cope with increased traffic volume. This would require reallocation of highway space to buses through bus lanes/ gates (and would need to extend beyond signals manipulation) to ensure buses have fast journey times which can compete with cars.
- Changes at Moor Lane roundabout and grade separating the pedestrian crossing by York College on Tadcaster Road to cut delays
- Bus lanes along Fulford Road – potentially in both directions
- Improving roundabouts on A1237 to improve flow.
- Interventions around the District Hospital/ Crichton Avenue area to improve bus journey times and reliability here

- An underpass for buses from land West of Wigginton (ST14) under the A1237, and improvements made to bus access to Clifton Moor – which currently lacks a quick bus service to York city centre
- A bus/cycle/pedestrian only link across the A64 from ST15 (Elvington) – if this could link could serve the University before coming into York.
- There should also be investment in the city centre, and on its approaches, to reduce the occasions when buses in York spend “the last mile” to the city centre in congestion.

Specific feedback on individual development sites

With regards to the development site ST14 West of Wigginton Lane, most young people from Wigginton attend Joseph Rowntree School and use the local bus services that are supplemented by duplicate buses. The addition of significant amounts of new housing will mean that additional resource will be to be provided to support the home to school journeys in this area – either by separate provision or even more duplicate buses on the local bus network. This would be the case whichever school these young people attend.

With regards to development ST15 West of Elvington Lane, these developments will need additional school buses to which ever school is deemed suitable (Currently Fulford School). In addition, the facilities at these schools to cope with additional school buses needs to be taken into consideration, as both are currently at capacity.

This is particularly important when looking to maintain the current school journey times below the current 60 minute maximum.

Sites ST14 in particular but also ST15 are probably not big enough to support new commercial bus services, although use of the measures outlined above will help. These developments need to be linked to current routes, so ST14 would need to be part of services linking the greater Wigginton area to York or extending services from Clifton Moor. Using a link bridge, ST15 is on the corridor linking Elvington, the University of York and York city centre and will therefore potentially enable this service to have better frequencies and attract more passengers.

There is a particular concern about the York Central site. Although it has the potential to be well penetrated by existing bus services (e.g. the 2, 10 and 59), and achieve a high mode share to bus, its location relatively close to York city centre means that, if its traffic impact is mismanaged, there is a risk that the development could place significant additional traffic onto York’s Inner Ring Road (Lendal Bridge - Gillygate and Queen St sections) and the links through Leeman Road, Lendal Arch Gyratory, Rougier St, George Hudson St, Ouse Bridge and Clifford St/ Tower St. Many of these links are already at or near saturation capacity for hours every day, leading to slow and unreliable bus journey times through central York, which then impact on reliability across the network. The QBP’s view is that the road access to central York through Leeman Underpass should be bus only to mitigate this.

Availability of land in York for use as bus depots

Operator partners within the York Quality Bus Partnership highlight insufficient operating centre opportunity to support bus or coach operations, either on new sites or by utilising or expanding upon existing operating centres.

Where existing operating facilities are situated, local planning policy appears to oppose the development, expansion or improvement of existing depot facilities with significant issues in gaining planning consent. In most cases, existing facilities are in areas of historic industrial or vehicle based use and that were not originally classified as green belt land. Constraints on the expansion of existing facilities can result in the inefficient use of several sites and can prevent pockets of land being made available for other uses.

Current land classification and insufficient appropriate site opportunities coupled with increasing land costs result in a significant barrier to any potential new operating centre, either for incumbent or new operators to the York bus and coach market.

The effect of appropriate land availability and planning policy affecting operators has several results:

- The number of bus operators serving York continues to contract, although the recent loss of two operators has not been a result of planning policy – there is not the availability of sites for operators to enter the market or existing operators to expand.
- The previous point also means there exists a serious barrier to enter the bus market in York and less competition for supported services, where they exist; City of York Council (CYC) has itself suffered from a less competitive tender market than would normally be the case.
- As there are no or very limited opportunities in the City of York, 'dead' mileage between a depot and the start or finish of service to the public is highly likely to increase as a consequence. Although CYC proposes a Clean Air Zone in the Centre of York, planning policy and use is gradually forcing a significant increase in dead mileage outside of the City Centre.
- The previous point has a further unintended consequence: use of electric vehicles would help the intended clean air improvement in the centre of York but for many operators would be unviable due to potentially significant dead mileage. While electric vehicle technology is improving, there is still a limited range without a charge meaning dead mileage uses much of this limited range.
- The gradual increase in population by continued development (planned for a 20% rise by 2032/33) would hopefully mean a resultant increase in bus use, there must be the available capacity for operators and vehicles to serve the existing and growing bus market.
- The lack of appropriate land for bus and coach depot facilities also results in higher land costs for operators that ultimately translate into higher costs for bus users.



Bus Operators and Council working together to deliver better bus services for York

Quality Bus Partnership: Local Plan Discussion Paper

Introduction

This paper discusses York's Local Plan with a view to making a collective response from the Quality Bus Partnership through the Plan's consultation framework. Individual operators may wish to make their own responses dealing with their specific concerns – for example about developments which may affect their routes or the availability of potential depot sites.

This paper sets out the Local Plan's position in a number of areas related to bus services, and asks for discussion of key questions towards formulating a common response. The consultation response will be submitted to the Local Plan team by 4th April 2018, when consultation on the current version of the Plan closes. A Supplementary Planning Document about transport will be prepared later this year.

Overview of the Local Plan

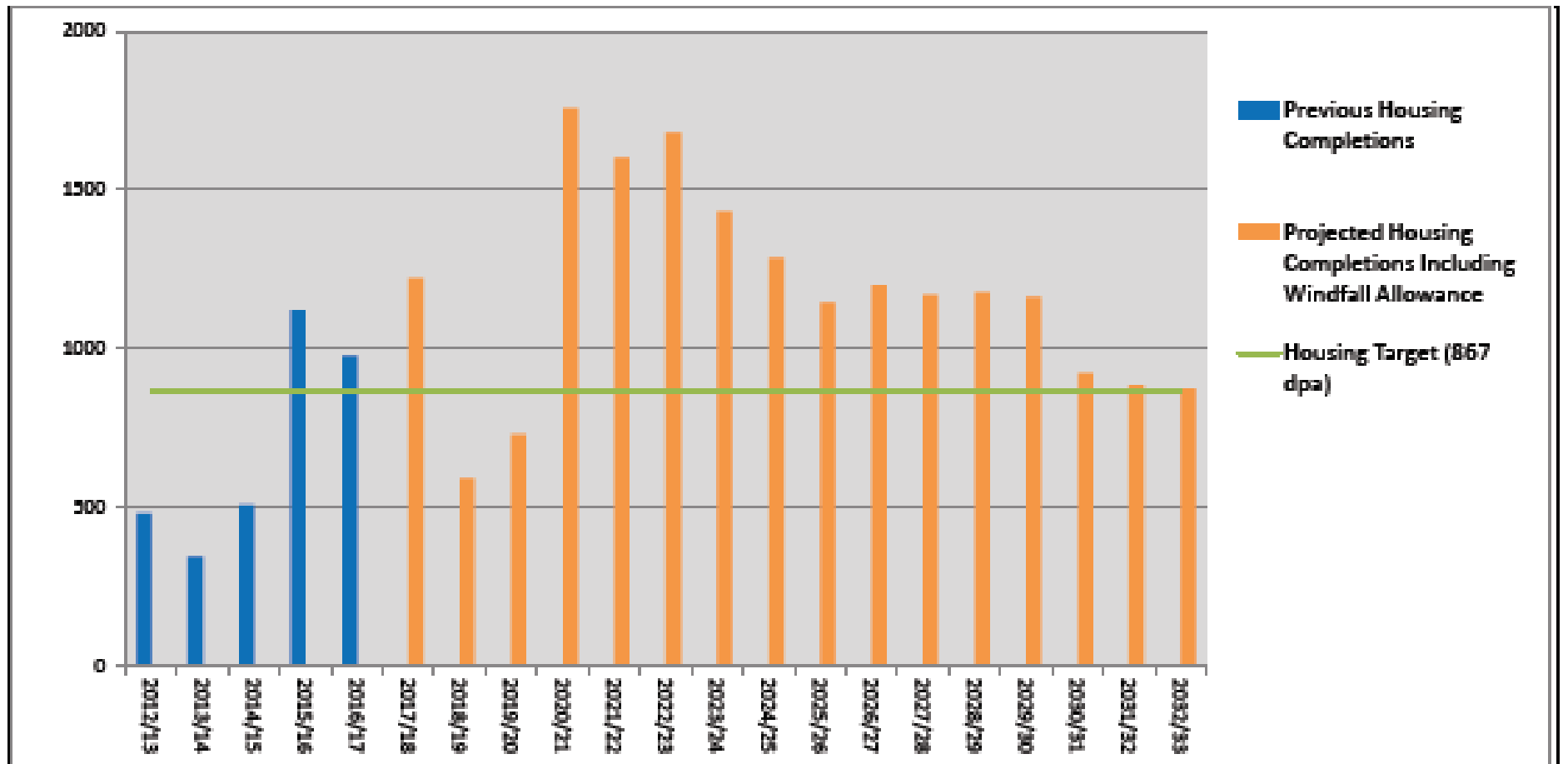
A Local Plan sets out a planned approach to development in a planning authority's area. It plans where new development will take place, how much development will take place, and sets out the infrastructure which the planning authority assesses is required to support the development.

York is relatively unusual in that it has not recently had an adopted Local Plan. The new Plan – which has been published as a draft document – is intended to cover the period from 2017 to 2032/33, although the green belt boundaries it sets out are proposed to be valid to 2037/38. A particular concern of the Local Plan in York is to enable housing development. York has an identified shortage of housing, and housing in the city is currently expensive in relation to local incomes.

Housing Growth Targets

York's Local Plan sets a target of 923 housing completions a year from 2017-2032/33, a total of 14,768 houses over the course of the plan. However, the Plan envisages a greater number of housing completions than this because of a current shortfall in completions, and envisages completion of 18,839 houses to 2032/33. This equates to an increase in York's population of around 20%.

Figure 5.1: Housing Trajectory



The Local Plan also envisages an increase in the land under commercial/employment use in York. Some of this is directly related to the increase in housing numbers (for example, additional schools to accommodate the higher population) whilst some is additional commercial development.

The pattern of development foresees that housing delivery will generally be below target in the years to 2020/21, then significantly above target between 2020 and 2030, then at target to 2032/33.

Housing allocations

The Plan has been prepared around the principle of “Sustainable Development”. This has seen housing allocations concentrated into a small number of strategic sites, rather than dispersed generally over the CYC area. One of the largest sites, York Central, comprises the former railway land between York Station, Leeman Road, Boroughbridge Road and Water End, with approximately 2,000 dwellings and substantial commercial development here. Other substantial development areas are:

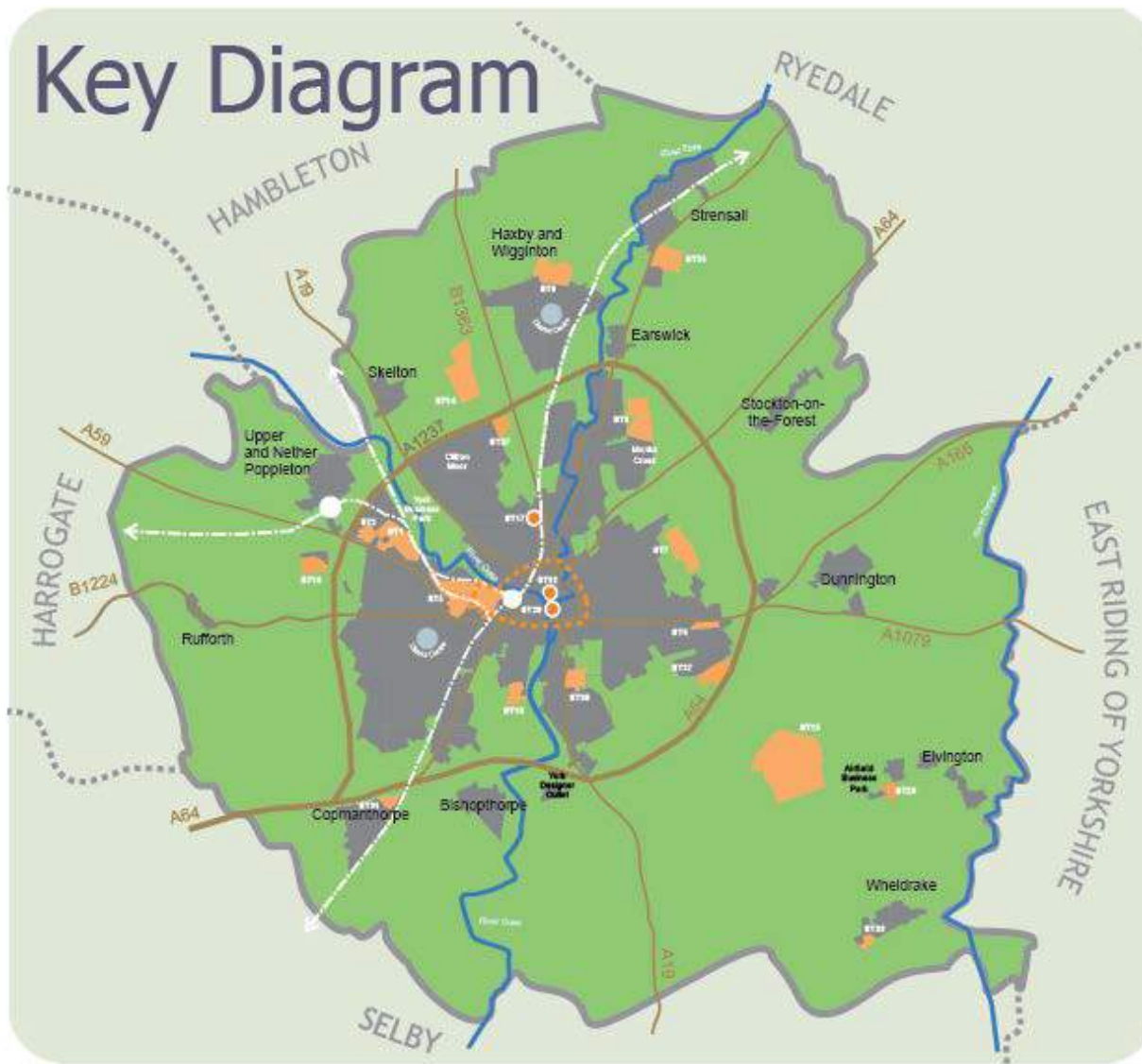
- Land East of Metcalf Lane (ST7) – 845 dwellings
- Land North of Monks Cross (ST8) – 968 dwellings
- Land North of Haxby (ST9) – 735 dwellings
- Land West of Wigginton Road (ST14) – 1,348 dwellings
- Land West of Elvington Lane (ST15) – 3,339 dwellings
- Nestle South (Wigginton Road) (ST15) – 863 dwellings
- Queen Elizabeth Barracks, Strensall (SS19) – 500 dwellings
- Imphal Barracks (Fulford Road) (SS20) – 769 dwellings

Substantial non-housing development is envisaged at:

- York Castle Gateway (development of Castle car park by Clifford’s Tower)
- York Central
- York University Expansion (the Heslington East Campus)

These allocations are shown on the plan overleaf.

Key Diagram



- York's main built up areas
- General extent of the proposed Green Belt
- City Centre
- District Centres
- Strategic Sites
 - ST1 - British Sugar/Manor School
 - ST2 - Civil Service Sports Ground
 - ST4 - Land Adjacent to Hull Road
 - ST5 - York Central
 - ST7 - Land East of Metcalfe Lane
 - ST8 - Land North of Monks Cross
 - ST9 - Land North of Haxby
 - ST14 - Land West of Wigginton Road
 - ST15 - Land West of Elvington Lane
 - ST16 - Terry's Extension Sites
 - ST17 - Nestle South
 - ST19 - Land at Northminster Business Park
 - ST20 - Castle Gateway
 - ST26 - Land South of Airfield Business Park, Elvington
 - ST27 - University of York Expansion
 - ST31 - Land at Tadcaster Road, Copmanthorpe
 - ST32 - Hungate
 - ST33 - Station Yard, Wheldrake
 - ST35 - Queen Elizabeth Barracks, Strensall
 - ST36 - Imphal Barracks, Fulford Road
 - ST37 - Whitehall Grange, Wigginton Road
- Rivers
- Main Rail Network/Stations
- Main Road Network

The Key Diagram is for illustrative purposes only, showing Strategic Sites, and the general extent of York's Green Belt. For more detail and other sites (including housing and employment), allocations and designations please see the proposals map.

In general, an assumption is adopted in the Local Plan that 15% of peak time trips from the new developments will be carried by public transport. This is approximately double the current York journey to work mode share for bus (although this is itself thought to be an understatement of journey to work trips in the York area because of the way the census questionnaire treats park and ride (which results in many park and ride trips into central York being ascribed to “car driver” because the respondent to the census is asked about the mode for the majority of their trip to work)).

Implications for bus services:

- Many of the developments are on corridors already served by high frequency bus services (for example, land north of Monks Cross (services 9, 12 and 20); land north of Haxby (services 1 and 13), Nestle South (services 1, 5, 6, 40), Strensall Barracks (service 5) and Imphal Barracks (services 7, 415 and others), York University Expansion (service 66);
- The “new village” sites are in areas where entirely new, or heavily amended existing) frequent bus services would be provided (Land West of Wigginton Road (1,348 dwellings), Land West of Elvington Lane (3,339 dwellings) and Land East of Metcalf Lane (845 dwellings). The intention with these sites has been to make them large enough to support new bus services on a commercial basis.
- York Central is a special case. The current proposal is that a largely new access road will be built, linking Water End with Lendal Arch Gyratory, replacing Leeman Road, which will be severed by an expansion of the National Railway Museum, but using the existing Leeman Underpass to reach York City Centre. The opportunity exists to use current bus services to penetrate this site (services 2, 10, 19, 22/23, 29/30/31 and 59).

Questions for the Quality Bus Partnership:

Do you agree with the principle of clustering development either around existing bus routes, or in new, stand-alone settlements large enough to support their own commercial bus services once they are fully built out?

Is the 15% mode share to bus figure realistic? What kind of attributes would services need to have to deliver that level of mode share?

Are the “new village” sites large enough to ultimately support commercial bus services once they are fully developed?

For the developments which can be served by existing bus services, if a 15% mode share did come to bus, does capacity exist on those bus services in York at the moment, or would additional capacity be needed (either larger vehicles or more frequent services). Which routes would be effected?

The sustainability of the York Central development is extremely important because of its position close to York city centre. In delivering the site, the Local Plan sees a very important role for bus services as a mode of access/ egress – especially trips into the site via park and ride. Is this proposal realistic using modified existing services?

Infrastructure:

Obviously, growth of this extent will place additional demands on the highway network. Modelling work for the Plan foresees an increase in travel times across York, although this is not uniform. Broadly:

- Traffic volumes would increase by 20% (7,000 AM peak hour trips)
- Overall travel times in the AM peak could increase by 30%, with delays increasing by 55%
- Interventions on the A1237 mitigate the traffic increase/ delays on the A1237
- The measures on the A1237 achieve some reassignment of traffic in York, which has the effect of reducing traffic volumes in the north-western quadrant of the city
- Delays, however, are experienced elsewhere on the network, particularly on radial routes and the Inner Ring Road.

The Local Plan is backed by an infrastructure plan which sets out a series of interventions which will mitigate the traffic growth stemming from the Plan's population growth. Funding has been identified for some of these interventions, but there are some interventions for which funding will have to be found. The principal infrastructure upgrades foreseen by the Plan are:

- Upgrades of several of the roundabouts on the A1237 so that they can accommodate greater traffic volumes (funding from WYCA is identified)
- A new route into York Central from Water End, replacing the current Salisbury Terrace - Leeman Road route) (funding from WYCA is identified)
- A rebuild of York Station frontage (funding from WYCA is identified) with a new bus layover and turn-around area
- Improvements to bus routes and passenger facilities in York city centre – to improve journey times (funding from WYCA is identified, although the precise form of this intervention is yet to be determined)
- Improvements to traffic signals across the city to improve the operating efficiency of key junctions and reduce queuing and delay on radial routes.

There are also pieces of infrastructure which are linked with specific development sites, specifically:

- An underpass which would allow the new bus service to the Land west of Wigginton Road site to pass from the development into Clifton Moor shopping centre; and
- A dedicated bus/ cycle route from the Land west of Elvington Lane site to a bridge across the A64.

There is a general policy to improve infrastructure for buses in York city centre towards the end of the Plan period (2027-2032/33) but this is not described in any detail and there is currently no identification of a funding source for delivering the interventions beyond the WYCA and developer funding identified above (although they could theoretically be funded by a Community Infrastructure Levy (CIL) or similar).

Questions for the QBP:

Do you think the Plan's Infrastructure Delivery Plan needs to include more detail about how the effect of traffic growth on radials and the Inner Ring Road will be mitigated?

At the moment the traffic status of the "town end" of the link through York Central has not been determined. Consideration has been given to making this bus only or open to all traffic. Does the QBP have a view on how the link can be configured to maintain delay-free and reliable travel times for bus services through York Central?

Do bus operators agree that the city centre should be a focus for expenditure aiming to improve reliability of services and reduce delays? Are there other locations which should also be considered priorities (for example, the area around York College, the area around York District Hospital)?

Do bus operators support the principal of improving the roundabouts on the A1237? Will this benefit bus services?

Do bus operators support the improvements to York Station Frontage, particularly increasing the number of stops at the Station and providing a layover and turnaround facility? Will this benefit bus services?

Do bus operators support providing an underpass from the Land west of Wigginton Road site under the A1237? Do they think it is essential to providing a bus service able to achieve the 15% mode share target specified in the Local Plan?

Do bus operators support providing a bus/ cycle/ walk only link across the A64 to the Land west of Elvington Lane site (probably a bridge)? Do they think it is essential to providing a bus service able to achieve the 15% mode share target specified in the Local Plan?

Planning new development sites

The QBP has previously discussed using the guide produced by Stagecoach to inform specific planning for buses within development sites (for example, road widths and layouts, bus stops etc). Are the QBP happy for this guide to be used by CYC officers when they are working with developers on site masterplans?

Other considerations

In previous consultation with the QBP a view has been expressed that the Local Plan contains insufficient allocated space for future bus depots to cope with the expansion of the bus network foreseen by the Plan. Does the QBP wish to include this in its feedback about the Draft Plan?

Are there any other matters which the QBP wishes to include in its consultation response to the Local Plan?

How do bus operators wish to input into development of the Supplementary Planning Document on Sustainable Transport?

Appendix A: Local Plan Transport Policy T2: Strategic Public Transport Improvements

Policy T2: Strategic Public Transport Improvements

The Plan will support the delivery of general and specific junction, highway or public transport infrastructure enhancements as set out in the Local Transport Plan 2 2011-2031 (LTP3) and subsequent associated (or complementary) investment programmes.

In addition, strategic public transport infrastructure, as listed below, and (if requiring land outside of the highway boundary to implement) as identified on the Proposals Map, will be implemented in the short-term and medium-term timescales shown, and pursued in the long-term timescale shown.

Short-term (2017-22)

- i. The following highway enhancements to improve public transport reliability
 - public transport interchange improvements at York Station,
 - Leeman Road / Shipton Road Corridor Improvements,
 - improve bus routing and waiting facilities adjacent to the memorial gardens in Leeman Road,
 - citywide improvements to the urban traffic control system, and
 - a package of physical measures to improve operation of the bus fleet and bus services in York city centre.

Medium-term (2022-27)

- ii. Further expansion of the Askham Bar and Poppleton Bar Park & Ride facilities to match rising demand.
- iii. The following highway enhancements to improve public transport services and reliability
 - a segregated grade-separated bus (and pedestrian / cycle) route across A1237 to improve connectivity with the areas to the north-west of the city, and
 - a dedicated public transport / cycle route linking the new settlement (ST15) to a suitable access on York's highway network in the urban centre of York (subject to confirmation of developers access proposals to site ST15 so not shown on the proposals map).

Long-term (2027-32)

- iv. A new railway station at Haxby.
- v. Traffic restraint measures in the city centre to improve public transport reliability

The Plan will also support (subject to compliance with other policies in the Plan) development proposals that

- vi. improve rail access and connectivity, including but not limited to new railway stations / halts for heavy or light rail services, and capacity improvements and other enhancements (including new technology applications, where appropriate) on rail lines running into or through York; or
- vii. provide highway enhancements to improve public transport reliability; or
- viii. facilitate the relocation of the Designer Outlet Park & Ride facility.

[REDACTED]

From: Katherine [REDACTED]
Sent: 04 April 2018 19:20
To: localplan@york.gov.uk
Subject: Consultation for Local Plan
Attachments: York Local Plan Consultation.docx.pdf

Dear Sir/Madam,

Please find attached a letter detailing our comments on the local plan.

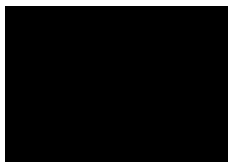
We would be grateful if these could be taken into account as part of the consultation process.

Kind regards,

Katherine and James Marsh

3 April 2018

Mr and Mrs J Marsh



Local Plan
City of York Council
West Offices
Station Rise, York
YO1 6GA

Dear Sir/Madam,

We would like to make the following comments in relation to the sites listed below as part of the York Local Plan consultation. As requested in your guidance we have separated our comments in to those relating to whether each site is legally compliant and/or 'Sound'. We would be grateful if you could take our comments into consideration as follows:

H39. Extension to Beckside

- Legal Issues – the land proposed for building on has been previously determined to be green belt land. Therefore this land should only be built on where there are no other options. We believe that alternative brownfield sites are available and that there is justification on building on this site.
- Soundness – the drains already struggle to cope with excess rainfall and there is a lot of surface water on the fields. Building on this land will add to the increased risk of flooding in the area.
- Soundness – the number of cars far exceeds the amount of available off road parking in this area resulting in congestion and disagreements between neighbours over parking. Adding further homes which will no doubt have minimal space for more vehicles is only going to add to the problem.
- Soundness – the proposed type of housing is not suitable for local families. Elvington is primarily a family area because it lacks the infrastructure and facilities of York inner ring road. Larger properties with decent sized rooms suitable for families and gardens for children to play in are required.
- Soundness - The planned development for Beckside is not sympathetic to Elvington in that it would lead to a clear split between the wealthier side of Elvington and the cheaper homes in Beckside. It would be more sensible to put any new development further towards the doctor's surgery and other amenities to improve the social mix of housing and integration into the area.

ST15 Land to the West of Elvington Lane

- Soundness – we are shocked that City of York Council are proposing to build on part of Elvington Air Museum. Surely one of the biggest tourism assets in York is Elvington Air Museum of which the runway plays a significant part. The runway and Air Museum have over 100,000 visitors a year. We were also of the understanding that one of York Councils policies was to promote business to the area through tourism. In addition, so many shops are being sold in York City Centre at present we need to keep hold of all of our tourism assets as much as possible to protect business in the area. In addition, the runway is

of historical significance and can be used again in the future. Once the runway is broken up it will probably never be rebuilt ever again.

- Soundness - In addition, is it wise to build thousands of homes next to a runway? I know this is not a commercial airport however, noise and pollution need to be taken into account for the residents of the proposed properties.
- Soundness – Infrastructure will be put under significant strain. It already takes me an hour to get to work (I work in York City Centre and I use the Park and Ride at Grimston Bar). A number of offices in York do not have parking for their staff and the links to sustainable transport from Elvington are minimal. There is one bus that leaves Elvington for the city at 7:20am, if I ride my bike Elvington Lane has a number of heavy HGV lorries, blind corners and is congested making the ride dangerous (especially in the winter when it is dark). The bit the park and ride bus does is the easy bit, it's getting to the park and ride that is the problem. Elvington Lane is too small to take the additional traffic of over 3000 houses, combined with 2000 homes that have been built in Pocklington, additional homes in Wilberfoss and Market Weighton. There is not enough detail in the plan to provide us with how the transport links to the A64 and B1228 will work.
- Soundness – the location of the site does not make much sense when there are alternatives available – for example where the Whinthorpe development was planned in the last York Plan- this would be closer to the York ring road enabling residents to make use of existing transport links instead of building a long road into Elvington from the proposed site.
- Soundness – Elvington has a small primary school and doctor's surgery which are already fully subscribed. We appreciate that if a housing development this size is built additional doctors surgeries and schools will be built however there will be a point where residents will be living in the properties before the surgeries and schools are ready to open and Elvington cannot cope with additional demand being placed on its resources.
- Soundness – the airfield is Greenfield not brownfield site – it should not be built on where there are already a number of brownfield sites available in York.

We would be grateful if you could take our comments on board and look forward to hearing the response of the consultation.

Yours sincerely,

Mr and Mrs J Marsh

From: Julian Rudd [REDACTED]
Sent: 04 April 2018 19:18
To: localplan@york.gov.uk
Cc: Stokes, Ian; 'James Peter Farrar'
Subject: York Local Plan comment from YNYER LEP
Attachments: York Local Plan Comments_form YNYER LEP Response - submitted.pdf

Please find attached the formal response of this LEP to the York Local Plan Publication Draft.

Kind regards

Julian

Julian Rudd
Housing and Planning Lead - York, North Yorkshire and East Riding Local Enterprise Partnership
Economy and Partnerships Lead - Ryedale District Council

[REDACTED]
[REDACTED]
[REDACTED] | www.ryedale.gov.uk

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Access your council services online, 24 hours a day, 7 days a week at www.ryedale.gov.uk

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As a public body, the Council may be required to disclose this e-mail (or any response to it) under the Freedom of Information Act 2000, unless the information in it is covered by one of the exemptions in the Act.

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		
Title	Mr	
First Name	James	
Last Name	Farrar	
Organisation	York, North Yorkshire and East Riding Enterprise Partnership	
Job title		
Address – line 1		
Address – line 2		
Address – line 3		
Address – line 4		
Postcode		
E-mail Address		
Telephone Number		

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

- Online via our website www.york.gov.uk/localplan.
- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes

No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared	<input type="checkbox"/>	Justified	<input type="checkbox"/>
Effective	<input type="checkbox"/>	Consistent with national policy	<input type="checkbox"/>

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph
no.Policy
Ref.

Site Ref.

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

York is the largest centre in our area and a major economic asset. It is in an important entity in its own right and exerts an influence over much the of LEP area. It has particular economic strengths and opportunities and has a key role in achieving the LEP's strategic aims of lifting productivity and wage levels through growth in high value sectors. However, the special character of the city and its traffic congestion create challenges in accommodating much needed housing and economic growth.

The City of York Local Plan Publication Draft identifies a significant number of housing, employment and retail opportunities to deliver growth up to 2032. The quantum and nature of the proposed development will be of great strategic benefit to this LEP area and it is important that the Local Plan is advanced to adoption quickly to allow delivery of these sites.

Past issues with under delivery of housing, together with recent market signals for York, mean that it will be essential to achieve at least the proposed minimum annual provision of 867 new dwellings over the plan period, together with any additional homes needed to reflect any under delivery of this annual target during the Plan period. This LEP will work with the Council, Homes England and developers towards achieving this.

The increase in the planned target to 100,000 sq m of B1a office space at York Central is strongly welcomed given the submitted EZ proposal and the pivotal role of this development for the economy of York and the LEP area. York Central is increasingly important; the site has been approved to move to final co-development stage for a potential c£57m Homes England funding and, with the York, North Yorkshire & East Riding LEP Enterprise Zone status providing an estimated £100m in retained business rates, significant investment is available to address some of York's infrastructure challenges and ensure early delivery.

Identification of appropriate reserve sites for housing and employment may assist in meeting the planned housing and economic growth in the advent that any of the proposed allocations do not come forward or are delayed. This would also provide flexibility to meet any future unforeseen economic or housing needs and / or address changes in national policy that may come forward.

Funding from WYCA to undertake feasibility and business case development for dualling of the A1237 is very welcome. This upgrading is a major element of this LEP's aim to improve east-west connectivity across the LEP area and is key to delivering the growth in this and future Local Plans.

Also important in terms of east-west connectivity is the Grimston Bar junction, which has capacity problems and faces increased pressure through proposals within the Local Plan. This LEP is keen to work with the City of York, East Riding and Highways England to achieve the required upgrading.

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 H.E. initiatives, for example) is likely to be required and where the Enterprise Zone retained business rates can be invested for maximum economic benefit.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature



Date

4 April 2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

From: Cllr. N. Ayre
Sent: 04 April 2018 19:27
To: localplan@york.gov.uk
Attachments: Cllr Ayre_Local Plan Consultation Response_04-04-18.pdf

Please see attached submission in response to the consultation on the Local Plan Publication Draft.



Councillor Nigel Ayre
Councillor for Heworth Without Ward



I am writing to provide my feedback and outline my support for the Local Plan Publication Draft 2018.

As a resident of York, I believe it is essential that we submit a plan that directly addresses the local pressures in our housing market, but at the same time, guarantees the protection of the greenbelt and York's natural beauty.

Overall, I judge that the City of York: Local Plan Publication Draft, Policies Map, Sustainability Appraisal and Strategic Environmental Assessment to be 'sound' documents. However, more specifically, I feel the following principles within the current draft of the Local Plan are crucial for the future development of York:

- The plan gives good protection of York's Greenbelt, protecting our unique City.
- Given that population figures are predicted to be lower than estimated by the Government, the plan provides enough houses for the people of York.
- From delivering roughly 500 houses per annum, to nearly 1000 house per annum, I believe that through the housing delivered under the plan, affordability will be improved in York.
- I am confident that with the current draft of the Local Plan, York will be able to provide sustainable development across the City and deliver a balance between providing new homes and delivering more employment, whilst protecting the City's special character.

It is essential that the people of York retain control of this process and ultimately, decide on the future of York itself.

Much discussion in York in recent years has centred on the objectively assessed housing need for the city. The Regional Spatial Strategy prior to its abolition in 2013 set an annual housing target for York between 2008 and 2026 at 850 houses per annum. In 2011, City of York Council submitted a Local Development Framework Core Strategy that sought to contain all housing developments to non Greenbelt sites. This suggested an annual housing delivery target of 575 and was supported by the majority of those who replied to public consultation. The only public representation at this meeting was from the York and North Yorkshire Chamber of Commerce, which called for 800 homes per annum. An amendment was proposed to increase the housing target to 800 homes per annum, which was not successful.

Following elections in 2011, the Core Strategy was amended to increase the annual housing figure to 800. Following concerns raised by the Planning Inspector, David Vickery in 2012 and the granting of planning permission at Monks Cross for a large new retail and leisure site, the plan was withdrawn by the council. In June 2013, a policy on proposal was put forward for 1090 houses per annum, which would have seen an overly ambitious growth prediction that was not supported by consultant reports. This politically driven iteration was halted by a motion at Full Council in October 2014. The following year, as work was being undertaken on the latest iteration, a group of housebuilders began a campaign called 'The Love York Let's Plan' campaign.' Backed by the Federation of Small Businesses in the city, the York Property Forum, and other independent York firms and begun by developers Linden, Taylor Wimpey, Miller Homes, Barratt and David Wilson Homes, the non-political campaign called for the delivery of 850 homes per annum.

The current administration's first Local plan preferred sites consultation included an annual housing figure of 841 houses per annum. Following a delay caused by an announcement by the Ministry of Defence, the DCLG published updated household projections – the 2014 based sub-national household projections in July 2016. This provided a baseline figure for housing growth at 867 homes per annum. The council accepted this uplift and included additional sites to meet this demand. Since then, the 2014 sub national population projections have been replaced with the more up to date 2016 projections. These have demonstrated a significantly lower level of population growth and show that the 2014 figures represent an artificially high point in population projections. The 2016 household projections, based on these figures, have not yet been released, but will see a significantly lower figure than the ones on which the local plan is currently based.

Given all the evidence from the old RSS figures, through to the most up to date population projections, it is clear that the current starting position of 867 homes per annum is a robust and realistic target. The current housing supply proposed in the local plan equates to 1008 homes per annum. Including a 10% allowance for non delivery, this relates to an annual housing delivery of circa 923 homes per annum. This significantly over delivers on all growth figures since the original RSS forecast, with the exception of the overtly political policy position which was rejected by council and expert advice. It is also a figure that equals or exceeds the number of houses proposed by all three main political parties in the city, developers, consultants, businesses and residents. I believe this is the first time in the history of this process that all parties have agreed on a figure for annual housing growth.

The second important thing to note is that the position proposed is not only realistic and robust in terms of population projections and consistent with economic model forecasting, it remains challenging but deliverable. The five year average for housing completions in the city remains 686 homes per annum, and the ten year trend is 575 homes per annum. Therefore, delivery of 923 homes per annum would be a step change in housing delivery in the city, but one that is achievable. To stretch this target further would be unnecessary and unrealistic. Such an increase in supply in the city would also have a far more significant impact on controlling housing prices and affordability in the city, than an artificial inflation of annual housing targets based on already artificially high population growth figures.

Greenbelt

In the recent DCLG Housing Need Consultation data table (September 2017), York ranked 15th out of 326 Local Authorities for the proportion of Local Authority land area covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest (82%). York is also in a unique position of having to set its Greenbelt boundaries for the first time. In order to preserve and formalise these Greenbelt boundaries, we must ensure Brownfield sites are developed at the first opportunity to avoid the scars of un-developed urban land seen within the city constraints.

Due to the need to ensure permanence of the Greenbelt, York is also required to allocate land for 21 years rather than 15 years required in planning policy. As such, the city has identified significantly more land for development and significantly more dwellings than would be required in a normal plan making process. The effect of this will help deliverability and affordability in a way that precludes the need for market forces adjustment. This can be robustly monitored through the five year land supply and if required, additional land could be identified at suitable review points. Doing so now would significantly oversupply Greenfield land and have a negative effect on brownfield development sites. Household projection figures for these final 6 years of the plan are no longer based on DCLG figures and just project forward a best guess, based on past trends which are inherently inaccurate.

Proposed changes to objectively assessed housing need

There has been much talk about the figure of 1070 which was included in the recent DCLG consultation, but this figure is irrelevant for York and would never be applied. The methodology is still out to consultation and the DCLG has been clear that this will not be applied to the current local plan if the timetable is met. Secondly, given the DCLG figures are based on outdated population projections, this figure would never be in place for any local authority. Any introduction of new methodology would be based on the new household projections, which are due in May 2018 and are based on much lower population projections than the ones used in the consultation. While they do show an upward trend in housing need, the current local plan has tracked that upward trend through its iteration, now significantly exceeding the old RSS figure, those of the submitted core strategy documents of 2011 and the figure endorsed by The Love York Let's Plan campaign (backed by the Federation of Small Businesses in the city, the York Property Forum, and other independent York firms and begun by developers Linden, Taylor Wimpey, Miller Homes, Barratt and David Wilson Homes).

Site-specific Comments.

In regards to housing allocations, I remain of the belief that the allocation of housing on Greenbelt land in the Heworth Without and Osbaldwick wards is unnecessary and inappropriate. Current government policy has resulted in a situation that has required the allocation of such land in the current plan. (For information, I have included my initial submission at Annex a) Under such circumstances, I endorse the work that has been undertaken by officers to try and mitigate the harmful effects of this. This includes:

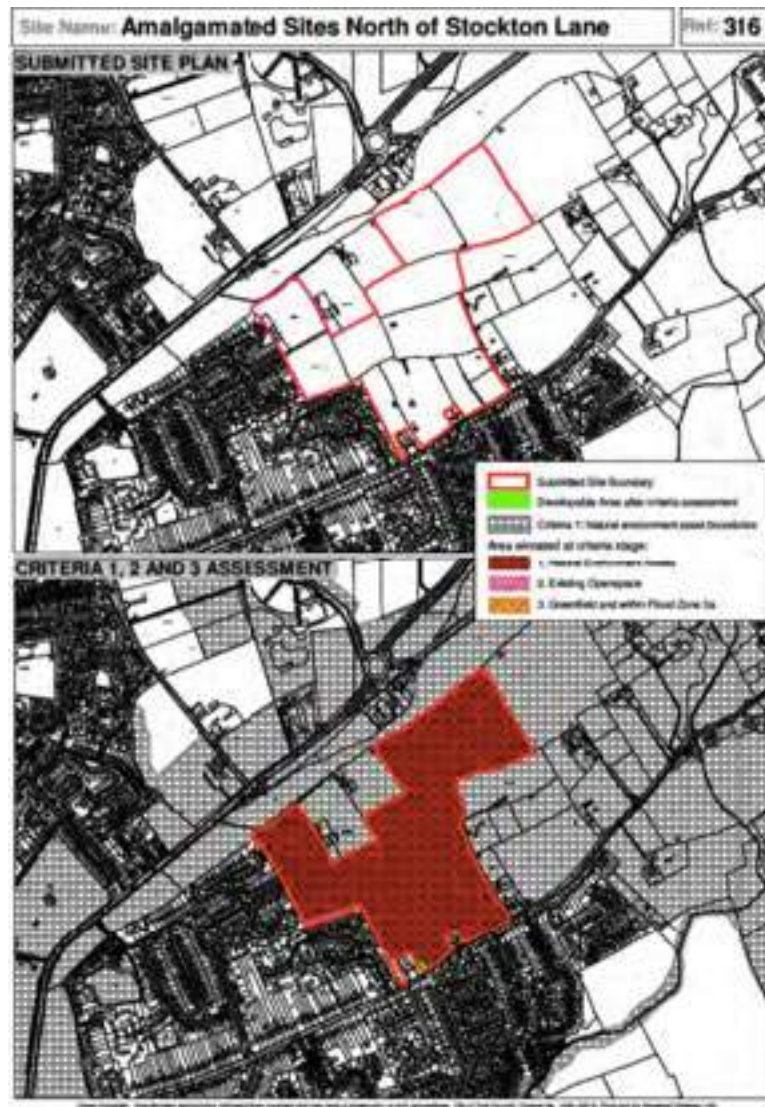
- The prevention of coalescence between the newly proposed development and existing housing. This maintains the inherently semi-rural nature of Heworth Without and allows the Greenbelt to maintain its function as enshrined in the NPPF.
- The protection of the millennium way – an important piece of public open space which is lacking in the area.
- The separation between the proposed new settlement and main entry routes into the city, ensuring the historic character of the city is not compromised.
- The restriction on housing numbers accessing from Stockton Lane due to the inability of the road network to cope with any further traffic.

ST20/amalgamated land north of Stockton Lane

During the consultation, I have also been made aware of a proposal from land owners between Stockton Lane and Malton Road for a further substantial housing development. Despite the short time frame (less than one week), over 1000 people have signed the attached petition opposing these plans which would also see residential development on at least two and possibly three existing sports pitches. The loss of these pitches is not, to my knowledge, supported by either club using this facility, nor is it necessary. It is my understanding that the council has the potential to raise the necessary funding with the sports clubs to provide adequate facilities, without the need for the inappropriate enabling development. The sites proposed have already been assessed by the council and found to be wholly unsuitable for development, as they involve substantial loss of some of the most valuable greenbelt land in the city and have no provisions for necessary infrastructure. The current proposals appear to involve some annexing of and potentially a new access road through Monk Stray.

These appear to include the following pieces of land in The Local Plan (2013) - Preferred options supporting documents

Sites removed after criteria 1 assessment:



The four stage site selection methodology clearly states the primary constraints to development.

Where sites fell entirely within these constraints, or where the remaining land left outside of these constraints, was below the threshold for development, the sites were ruled out and not carried forward for more detailed analysis.

This was the case in 2013 with site 316.

As part of the Preferred Options Consultation of 2013, the council received a number of representations which submitted further evidence for consideration against Primary constraints.

This evidence and the decisions taken are presented in the Further Sites Consultation Documents 2014.

The parcel of land recognised as site 187 (the southern edge of the amalgamated parcel 316) submitted evidence to suggest that it was not essential to the Historic Character and Setting of York. This is presented in Appendix 2 of the FSC on pages

84 to 86. This analysis led to this southern section of the site being tested as site ST30 in the 2014 halted publication draft Local Plan.

No further evidence was received on any of the other parcels of land which formed the amalgamated site 316.

No parts of the site were appraised again until the Preferred Sites Consultation of 2016 where site ST30 was discussed on page 152.

The assessment by officers was;

“Following further technical officer consideration of the site it is considered that the site performs an important role in maintaining a green wedge into York from Monk Stray which contributes to the setting of York. Maintaining green wedges is a key characteristic of York and an important role of York’s Green Belt. The site is not contained to the north and eastern boundaries opening onto open agricultural fields to the northern boundary providing access to open countryside. Pasture Lane to the eastern boundary has intermittent residential properties along a track and does not provide containment to the site.”

This confirms that the smaller site ST30 is unsuitable for development as well as the larger even more unsuitable parcels of land;

- 102 - Stockton Lane Land
- 103 - Land at Stockton Lane, York
- 153 - Land north of Stockton Lane
- 187 - Open Pasture Land North of Stockton Lane
- 245 - City of York Hockey Club
- 254 - Stockton Lane Land.

It is especially important to note that none of the land owners in areas, other than that covered in ST30, provided any further evidence or challenged the 2013 decision when possible through the Preferred Sites Consultations of 2014 and 2016 and therefore, should not be trying to submit at without public scrutiny at this current time.

Yours Sincerely

Nigel

Cllr Nigel Ayre
Executive Member Leisure Culture and Tourism
Ward Councillor Heworth Without.

Annex A

Submission in regards of sites
included in the Local Plan located
within Heworth Without Ward

Submission 1

Site ST7 – Housing

Submission 2

Policy AHM3 – travellers site Chowdene Campsite, Malton Road
(inc. Land off New Lane)

Submission 3

Location of Wind Farms

Submission 1

Context

This is a formal objection to the inclusion of land East of Metcalfe Lane, (Site ST7) contained in the draft York Local Plan preferred options paper. This objection can be read in conjunction with the wider Liberal Democrat submission analysing the flaws in the proposed plan.

This presents only a very brief appraisal. The failure to supply documents at the correct time and failure to supply some documents at all have ensured the eight week consultation period is an inadequate time frame to assess and comment in detail on the plan. I will continue to work on this more prior to public examination.

The site in question sits in York's Greenbelt. The Government's revocation of Regional Spatial Strategies specifically excluded policies referring to the Greenbelt and as such despite claims to the contrary the current land is offered full protection as Greenbelt Land. In the original 2011 Local Development Framework the land maintained its Green Belt designation. A subsequent policy seeking aggressive housing expansion in the city included the site as potential development land at the end of the plan policy if sufficient land was still required. The current proposal takes this one stage further and brings the land forward at the beginning of the plan period. It sacrifices a significant part of York's heritage and character at the altar of a failed affordable housing policy.

The policy claims that the aim is to deliver affordable housing for York residents and their children. This is not borne out by the evidence in the plan itself. The Arup report clearly states that while natural population growth will lead to an increase of 10,000 residents by the end of the plan period, the need for these homes will be fuelled by migration of 228,000 from outside the city and 50,000 migration from outside the UK. The policy sacrifices York's greenbelt in the short term, stagnates progress on brownfield sites, to build more houses predicated on overly ambitious migration targets. This may or may not lead to the desired affordable housing targets but this is unlikely. It does have the potential to flood the city with houses without the population growth to occupy. Any subsequent depression of housing prices would be catastrophic for many young families in the city on the brink of negative equity.

If adopted the current plan would see this and other sections of Greenbelt lost for ever in a rush to develop cheap(er) and more higher profit sites while key strategic brownfield sites across the city will see development stalled. The results will blight the city forever.

The plan is based on a flawed methodology that takes ideology as a starting point and then seeks to manipulate the evidence to fit the hypothesis. Evidence clearly shows that the housing numbers included in this plan are neither realistic nor deliverable. The result is a rush to release easily developable greenbelt land. National Planning Policy clearly states that population figures should be drawn from Strategic Housing Market Assessments. Ignoring this fact the plan attempts to use employment projections to fit a desire for higher housing targets. The Plan's evidence base clearly states that basing housing needs on employment growth is at best risky and such approaches have been rejected by the planning inspector as unsound.

The Arup report itself describes the chosen approach as "a significant step change in housing provision and economic growth... housing growth reflects a **policy response to pursue economic growth rather than the baseline position on housing need.**" It would require early release of green belt land on the basis that "it is vital the right sites ... be allocated in the

right locations so that this is delivered.” Yet the report states “the environmental impacts of such an approach would need to be carefully considered.” This has never happened.

There is no evidence that these ambitious targets are in anyway deliverable. The policy requires a 40% increase on the 10 year average completion rate and 58% increase on the five year average. It seeks annual delivery of houses that has only been achieved twice in recent times, and even then only through the type of high density apartment building that this plan does not seek.

This approach provides the wrong sequential approach, favouring greenbelt before brownfield. The evidence concludes that the only way to come close to achieving this is to sacrifice high value greenbelt land early; “this will need to be supported through providing a supply of viable land, in the right locations, as part of the allocations process.”

Pressure has been increased by the failure to include windfall sites, which were included in both 2011 LDF’s agreed by Full Council, despite changes to legislation that now allows such inclusion. The Local Plan evidence base, SHLAA shows evidence of historic delivery of 367 windfalls pa.

Great importance is attached to Green Belts in the NPPF. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Five purposes which the Green Belt serves comprise the following:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The current policy to remove this land from the greenbelt is counter to all 5 of these objectives.

Specifics of the Site

1) Highways

The council has failed to submit any evidence that the site is deliverable in terms of traffic infrastructure. It has been stated by officers that **no work has been done** to establish this. The site has no existing transport access. I still await more information at the time of submission but access to this site can only be achieved by new roads connecting on to three streets, Stockton lane, Bad Bargain Lane and Osbaldwick Lane none of which have existing capacity and each have areas that are over capacity. Neither road has any potential for expansion to create more capacity (certainly without further development of the greenbelt). Each option would place significant extra traffic at the following junctions which are all already at capacity, Bad Bargain Lane/Tang Hall Lane, Osbaldwick Lane/Tang Hall Lane, Stockton Lane/Heworth Green roundabout and Malton Road/Hopgrove Lane South. Traffic in this area

is already predicted to increase significantly with the new development at Monks Cross and could not cope with extra movements.

2) Design and Conservation

Heworth Without is distinct from Heworth by its semi-rural nature. Where the area regarded as Heworth tends is bound by development on all sides;



the majority of the Heworth Without area, the parished section especially remains characterised by open rural aspects.

The estate of streets including Woodlands Grove etc. and Elm Park Way is bound on both sides by the historic stray and by open farmland that forms one of the green wedges in to the city.





The same is true of the group of streets around Greenfield Park Drive.



The group of streets including Galtres Road, Ashley Park Road and the Beans Way estate are sandwiched by the identified green wedge to the North of Stockton Lane and the currently unidentified Green wedge to the south around Tang Hall beck.



The area around Bramley Garth is bordered North, South and East by open countryside;



This semi-rural aspect represents the very character of the area of Heworth Without and especially the parished area where development is proposed. It was previously part of Ryedale District Council prior to the formation of the unitary authority. As such its character is visibly distinct to that of the urban area.

The proposed plan would subsume this semi-rural suburb into part of the urban extension. It will coalesce boundaries with Osbaldwick resulting in the loss of two distinct and separate areas. This is against the Local plan's own policies.

No assessment has been made of the environmental impact of developing this site. The land currently houses numerous species including wild deer, foxes, pheasants, great crested newts and many species of birds and yet no assessment has been carried out. This is contrary to the evidence within the Local Plan itself and means it is not in conformity with its own evidence base.

The Local Plan's own evidence base includes the view from the A64 to the Minster as one, "which, above all, capture and express the very image and essence of York" (photos attached at annex 1), yet the plan proposes obstructing this view with 1800 homes and a wind farm. The plan is therefore not in conformity with its own evidence base.

The site chosen for the majority of development is listed in the Core Conservation Area Appraisal as one of the city's 26 Key Views; "The only section of the Ring Road that provides an extended view of the Minster". It states;

"the cathedral is seen rising above the **flat agricultural land which makes up the immediate context of the city**" It is clear therefore that removing this land from the Greenbelt would cause significant harm to the character setting and context of the city.

This appraisal says development should not be permitted that would challenge the visibility of the Minster. This is exactly what is being proposed here.

You can find the same information in Annex E of the Core Strategy, the Heritage topic states;

"it is essential to protect the views of the Minster Tower from the Ring Road ...further analysis to understand the potential harm to strategic views should be undertaken."

There are numerous public rights of way running through the identified land including the popular "Millenium Way Walk (photos attached at annex 2). These provide informal recreational space for residents in an area of identified deficiency of open space. They are also key to experiencing the setting and character of the city. The Heritage Topic Paper (included at Annex 3), part of the evidence base for the Local Plan, cites Millenium Way as one of the key features of the historic landscape setting and character of the city, a "walkway(s) from centre to countryside." It emphasises the importance of Public Rights of Way; "Many of the district's public rights of way (PROW's) are now used purely for recreational purposes. But historically they had a number of purposes such as drove roads, Roman roads, and tow paths. Today they form important direct access to the countryside and cross-country links between neighbouring settlements;"



The Heritage Topic Paper is unequivocal in its description of the value of the land proposed to be developed here;

“York’s landscape ... does include a range of features of natural, historical, and cultural significance that contribute to the special qualities of the local landscape. This is also the landscape that serves a substantial population, thus placing great importance on the amenity that it affords. The landscape provides the city and its outlying villages with a rural setting and a direct access to the countryside, and thus has a value/status that reaches beyond the relative quality of the aesthetic landscape.

Its relevance lies in the conglomeration of layers and relics of old landscapes, in part conserved through time by continuous administration, absence of development and centuries of traditional management. It is the combination of the various elements such as the Ings and strays that provides York's unique make up. The natural environment is significant in its concentrated collection of a variety of examples of historically managed landscapes, represented for example by wild flower meadows, lowland heath, valley fen, strip fields, veteran orchard trees, species-rich hedgerows. Many of these otherwise isolated remnant landscapes link up with other open spaces resulting for example from our industrial or war time past, to form often accessible tracts of subtly diverse landscapes; thus the landscape/ natural heritage is much greater than the sum of its parts. "

The land included clearly forms part of a distinct green wedge that characterises the city yet has not been included in the greenbelt appraisal indicated in green below (the red section shows the defined green wedge) The northern boundary of this section of this wedge is clearly marked by Tang Hall Beck. The Spine of the wedge is the Public Right of Way Millenium Way which runs from the A64 along to the line of Bad Bargain Lane (indicated in blue);



3) Flooding and Drainage

It should be noted the name Bad Bargain Lane, refers to the poor deal received on a piece of land that transpired to be 2/3 swampy pond. Those who learn nothing from history are doomed to repeat it.

Residents do not believe there has been adequate assessment of the effect of drainage. The area suffers frequently from surface water and drainage related issues which are not fully

assessed. Gardens are underwater during even short periods of heavy rain. Despite separate surface and foul drainage even short periods of heavy rain result in toilets backing up. This issue has been running for some 20 years and is further exacerbated by each subsequent development. Further work is needed.

4) Air Quality

Increased traffic in the vicinity of the site and elsewhere on the network transforming key arterial routes to permanent traffic jams will have an enormous negative impact on air quality in the area. Further work is needed.

5) SHLAA 2011

The Local Plan's own evidence concludes at Appendix 5 that those sites previously submitted East of Metcalfe Lane are unsuitable for development.

In order to justify inflated housing targets a revised analysis of "Area B" was included as part of the revised LDF in September 2011. This concluded that the site **may** possibly become viable long term if Brownfield sites did not come forward. While residents still maintain this assessment is wrong and even long term the site is not viable, deliverable or suitable it is clear from the evidence that this is not deliverable in the early years of the plan as this submission tries to achieve.

I have included these assessments in Annex 4. It should be noted this is evidence contained within the plan itself not from previous plans. The plan is therefore not in conformity with its own evidence base yet again.

6) Public Opinion

Residents in the area have uniformly opposed the plan. To date 400 residents of the ward have signed a petition opposing the use of this land and the list continues to grow. A council consultation in the ward was attended by over 200 residents. A poll undertaken by the Parish Council at the event showed over 95% of respondents were opposed to the plans.

7) Local amenity

Since the site analysis decisions have been taken to close Burnholme School, merge the two schools in Osbaldwick and close the GP surgery. It is questionable whether capacity exists in the two nearest secondary schools to meet the demand from the closure of Burnholme School and existing demographic trends without beginning to include the additional growth suggested in this plan. The area has a poor local bus service with no service at all on evenings and weekends.

8) Public Consultation

Has been wholly inadequate. On completion of the consultation I will seek to provide a fuller assessment of the consultation process. Issues include

- Lack of information.
- Consultation documents lacking important information.
- Misleading/False statements made by senior councillors during the consultation period.
- Holding consultations at unsuitable venues and venues that were inaccessible to people in wheelchairs.
- Failure to provide copies of relevant information at local libraries.

- Officers could not provide any information for residents on transport, infrastructure and local amenities.
- Listed evidence base missing key documents.

Conclusion

The evidence shows that there is no real housing need for the release of this site. The plan also does not demonstrate that this site is deliverable. There is no evidence that the level of infrastructure required to deliver this site can be achieved. Development of the site would have a catastrophic effect on the setting and character of both the city and the area of Heworth Without. It would amount to nothing more than unrestricted sprawl of large built-up area and would lead to neighbouring villages merging into one another. Public consultation has overwhelmingly rejected the inclusion of this site. Releasing this site will stall city centre Brownfield development.

Annex 1 – Key Strategic view of city



Annex 2 – views from Public Rights of Way



Appendix 3 – Heritage Appraisals

Heritage Topic Paper Update (2013)

Landscape and Setting			
Character elements	Key Features	Examples	Significance
Rivers and Ings	<p>Donwont Quoc:</p> <p>Flooding: Ings meadows, retention of traditional management; over centuries – still hay cropped and grazed where possible</p> <p>Cruse – walking along most of either bank north to Penington High Hall south past Bishops Palace. Activity on river – rowing (3 clubs) dating back to mid 19th century.</p> <p>Foss – two rivers converging in city centre, walkway from centre to countryside beyond ring road, linking villages – the ‘hidden’ river.</p> <p>Views along riverbanks.</p>	<p>Donwont Ings;</p> <p>Fulford Ings (north of the ring road); Naburn marsh (south of ring road); Church and South Ings, at Asenside meadows, all SSSI’s.</p> <p>Millennium Walk, New Walk, Terry’s Walk.</p> <p>Lawson’s of Trees</p>	<p>The Donwont Ings are internationally important SSSI’s of national importance. Their significance lies in the number and value of SSSI’s within the local authority boundary.</p> <p>Setting of city and recreational value.</p>

Landscapes and Setting			
Character elements	Key Features	Examples	Significance
Views in and out	<p>Long distance views of York Minster in low-lying relatively flat wide landscape. The Minster constantly reappears at closer quarters.</p> <p>View of the race course/ Knowesmere and Minster combined.</p> <p>Pre-dawn setting viewed from majority of ring road by way of field margin (northern ring road business parks exception to rule).</p> <p>Views out to the Wolds, Moors and the Howardian Hills (orientation, identity, and sense of local and setting).</p>	<p>Views from the A61 to Minster from stretch between Huggate roundabout to Hull Road</p> <p>View of Minster and city from Auldson Ryan roundabout</p> <p>Closer views of Minster from Leeman Road and Water End</p> <p>View of Minster/race course/Knowesmere from A64 Dishforthorpe.</p> <p>Views out from Acomb, Kimberlow Hill/Anston Bar.</p> <p>Views from the Chase when approaching from the south.</p> <p>Views entering York by Rail from the North, as the line sweeps round by Water End bridge.</p>	<p>This is an important English cathedral landscape that goes to the heart of York's identity and wilderness.</p> <p>There is a unique combination of elements of historical/cultural significance important for the setting and identity of York.</p> <p>The proximity of hills/countryside provides a strong sense of place and location. The long distance views are rare element of surprise and appreciation.</p>

5.85 The high concentration of airfields within the York area provides large expanses of openness within an otherwise hedged landscape. Many of the runways are still present. Blyngton now has an uncommon grassland habitat and birds because of its extensive open nature on former soils. Airfields such as Fylington provide a link in the green infrastructure as it connects Denaby side to Heslington (site and related to the golf course on Heslington common and thence to Walmgate stry in very close proximity to the historic core.

5.86 Orchards, both commercial and private, were common place in and around York during the late 10th to mid 20th century. Many of the trees were incorporated into long rear gardens as the city grew in such areas as Lillgate, Knappin Lane, and Tang Hall, the significance of which was written into the deeds of the properties. Some of these still stand today as veteran pear and apple trees. There are a few rare instances where the remains of neglected orchards have not been absorbed by later development, such as that which formerly belonged to York City Asylum (later Nelson Hospital). This is now managed as Fulford Community Orchard by the local community. A new community orchard was created at Unaccrood meadows in Fulford in the 1990's, and on Skarrott Green in 2011.

5.87 Many of the districts public rights of way (PROW's) are now used purely for recreational purposes. But historically they had a number of purposes such as drove roads, Roman roads, and tow paths. Today they form important direct access to the countryside and cross-country links between neighbouring settlements, and long distance routes such as The Minster Way and the Ebor Way pass through the city centre. These historically devised long distance routes on existing public rights of way connect a variety of landscapes, and make cultural/historical references. The Minster Way links the north's two pre-industrial centres, Minster - Beverley and York. The Ebor Way (named after Eboracum) created in 1970 connects Halmsey with Ilkley and passes alongside the river Foss and Ouse and is led beyond the city's boundaries to the wharfe along the line of a Roman road.

5.88 Designed suburban villages. The model village of New Eborwic, contemporary with Saltire and Port Sunlight, was founded by the York philanthropist Joseph Rowntree. Today it continues to provide a good example of the combination that generous and thoughtfully laid out open space, private gardens, and landscape detail, especially grass verges, street trees and hedges, can make to the perceptions of well being through good design. The Foss, integral to the eastern side of the village, provides added amenity and recreational benefit, plus immediate access to the larger countryside. Similar principles were applied to much of Long Hall which was designed and laid out by the City of York Corporation, where streets such as Fifth Avenue, Melrosegate, etc. were laid out with private gardens bound by hedges, wide grassed verges adorned with avenues of Lime trees, and included public parks alongside Tang Hall back & Osbadwick Beck, and provision of allotments.

Landscape and setting

6.29 On a national scale York's landscape is considered generally not to be of a particularly high quality. Nonetheless it does include a range of features of natural, historical, and cultural significance that contribute to the special qualities of the local landscape. This is also the landscape that serves a substantial population, thus placing great importance on the amenity that it affords. The landscape provides the city and its outlying villages with a rural setting and a direct access to the countryside, and thus has a value/status that reaches beyond the relative quality of the aesthetic landscape.

6.30 Its relevance lies in the conglomeration of layers and relics of old landscapes, in part conserved through time by continuous administration, absence of development, and vestiges of traditional management. It is the combination of the various elements such as the hags and strays that provides York's unique make up. The natural environment is significant in its concentrated collection of a variety of examples of historically managed landscapes, represented for example by wild flower meadows, lowland heath, valley fen, strip fields, veteran hedged trees, species-rich hedgerows. Many of these otherwise isolated remnant landscapes link up with other open spaces resulting for example from our industrial or war time past, to form often accessible tracts of valuable green landscapes, thus the landscape/natural heritage is much greater than the sum of its parts.



The Knapthorn, part of Milegate Stray and an important part of York's green infrastructure.

Annex 4 – Analysis of Land East of Metcalfe Lane in Strategic Housing Land Availability Assessment



Site Details		
GENERAL		
Site Reference	0004_2539	
Name of Site	East Field of Metcalfe Lane	
Address	Adjacent to Metcalfe Lane and Longdon House	
Ward	Osby and	
Eastings	452 167.07	
Northings	452 363.27	
Gross Site Area	12,719 sq m	
PLANNING STATUSES		
Current Land Use	Feature Land	
Source of site	Call for sites and Alternative site at changes of	
Site Status	Potential site	Yes
	With permission	No
	Under Construction	N/A
	Completed	N/A
Planning Status (if applicable)	Excluded	N/A
	Permission Type	None
	Application Reference	N/A
	Listed permitted	N/A
	Date expired	N/A
	Number of units outstanding	N/A
	Number of units completed	N/A
	Applications received (not all listed below)	N/A


Site Details

GENERAL			
Site Reference			
Name of Site	Land east of Motzick Lane		
Address	North of Long Hall Park North of Hill View		
Ward	Leedswood		
Rating	100.104.06	North	100.104.06
Gross Site Area	4.57 ha		

PLANNING STATUS		
Current Land use	Pasture Land	
Source of site	Alternative site at changes 3	
Site Status	Potential site	Yes
	With permission	No
	Under Construction	N/A
	Completed	N/A
	Excluded	N/A
Planning status (if applicable)	Permitted - yoo historic, employment, retail, mixed use, other	None
	Application Reference	N/A
	Date permitted	N/A
	Date Expired	N/A
	Number of units outstanding	N/A
	Number of units completed	N/A
	Application not valid (check attributes above)	N/A

Suitability Assessment		
Criteria	Considerations	
Primary Constraints	<ul style="list-style-type: none"> Not situated in the Flood Zone 3C adjacent to the coast No major conservation areas within proximity of the site Not within a scheduled, designated or special area The site is adjacent to the High Water Area 	Amber
Location Suitability	<ul style="list-style-type: none"> Not near a major rail or main road Not near a major or main road or main road junction or main road junction Not near a major or main road or main road junction or main road junction Not near a major or main road or main road junction or main road junction Much of the site is considered to be at risk of flooding (Zone 1B, 2) but the two south east areas of 2a-2d are not 	Red
Transport and Accessibility	<ul style="list-style-type: none"> Access to the nearest primary school within 800m No access to a GP Surgery within 300m walking (Whitby drive 300m) No access to convenience stores within 300m (Whitby drive and bed target) late on site until 300m along walking routes Good access to car / pedestrian bus routes within 400m (M6, 11 & Coastline) No access to a leisure facility (15 mins or less) within 400m Not within a hydroelectric power zone Transport Assessment required - mitigation works away Needs to be considered in conjunction with approval of local line scheme Capacity to deliver an quality scheme but assessments would be required 	Red
Use Suitability (Local Planning)	<ul style="list-style-type: none"> Records show some areas of flood land on site, which may have caused land contamination. Will require desktop study and site investigations in situ. No known contamination One unauthorised structure on site A full site investigation would be required Not within an area of special interest or other constraints or other constraints 	Amber
Strategic Policies	<ul style="list-style-type: none"> Not within the Green Belt The site is not designated open space The site has access to recreational natural open spaces and outdoor sports facilities within 1000m accessible distance The site is defined in access to city parks, local parks, amenity green spaces, children's / children's play areas and young people's facilities Childcare need has a deficit of natural and semi natural open spaces (7.17%) or amenity green spaces (-4.15%), children's play spaces (-0.52%), facilities for young people (-0.71%), outdoor sports facilities (-3.12%) and children's (-1.23%) against recommended local standards Not within a major urban area with a concentration of sites for a strategic transport link or major urban area. The site is not within a major urban area with a concentration of sites for a strategic transport link or major urban area. 	Amber
<p>Notes: This is a strategic site located on the edge of the urban area. It is not a very poor site in all services except for transport bus routes and is located from the larger area by Tang Hall Road. A transport assessment would be required and mitigation works are likely. Further studies into land contamination are also required. The site is mainly located within low flood risk but is directly adjacent to the beach with some areas of slightly higher frequency storms. The site has very limited access to most types of open space with acceptable access to recreation and leisure facilities in a strategic location. Having many open spaces, children's play space, natural and semi natural open spaces and outdoor sports facilities so it is important that opportunities to increase the provision of high quality and accessible open spaces are maximised in new developments. As the site is within the extent of York's Greenbelt it is unlikely to come forward for housing unless directed by the core strategy. In the core strategy document this site is identified through the key diagram (Page 3011) as an area of Strategic Open Space in connection with areas of search should they be required.</p>		
<p>Recommendation: This site is considered unsuitable for development.</p>		


Site Details

GENERAL	
Site Reference	
Name of Site	Land East of Melcafe Lane
Address	North of Outgoing Industrial Estate and disused railway
Ward	74 Millthorpe
Easting	465,671,000
Northing	462,302,334
OS Grid Reference	11 / 116

PLANNING STATUS		
Current Land use	Former land, non-waste recycling centre and caravan site	
Statutory site	Alternative site for 13 properties	
Site Status	Potential site	Yes
	With permission	No
	Under Construction	N/A
	Complete	N/A
	Excluded	N/A
Planning Status (If applicable)	Permission Type (residential, employment, etc, mixed use, other)	Former waste centre and non-waste recycling centre
	Application Reference	07/01243/TUL
	Date permitted	N/A
	Date Expired	N/A
	Number of units outstanding	N/A
	Number of units completed	N/A
	Application valid (refused, withdrawn)	Completed

Submission 2

This is a formal objection to Policy AHM3 contained in the draft York Local Plan preferred options paper that includes Chowdene Campsite, Malton Road (inc. Land off New Lane) as a site for 20 traveller's pitches. This objection can be read in conjunction with the wider Liberal Democrat submission analysing the flaws in the proposed plan.

Inclusion of the site is counter to the National Planning Policy Framework

National Planning Policy E: Traveller sites in Green Belt

14. Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development.

This site has previously been refused planning permission on the grounds of access to the site. The site is therefore unsuitable for use as a traveller's site as the proposed development would be likely to intensify the use of substandard access of restricted width. The increase in traffic using the access will predominantly be by vehicles with trailers/caravans. The access is taken from a classified highway which is a main artery into the city and carries high frequency public transport services. The limited width cannot be improved due to boundary features and land ownership issues, and will make access for cars towing trailers/caravans and HGV's particularly difficult. The restrictive width together with the increased frequency of use of the access will increase the likelihood of such vehicles having to wait on or reverse out onto A1036 Malton Road. Such manoeuvres would be detrimental to the safety of highway users, particularly vulnerable highway users such as pedestrians and cyclists using the adjacent shared pedestrian/cycle route. Furthermore the increased frequency of vehicles having to wait to enter the site or having to reverse into Malton Road will interfere with the free flow of traffic with associated detrimental impacts on service reliability to public transport routes including Park and Ride. Thus the development is considered to conflict with advice contained within the National Planning Policy Framework (section 4-paragraph 32) which states that decisions should take account of whether safe and suitable access to sites can be achieved for all people, and Policies T2a and V5 of the City of York Draft Local Plan.

Submission 3

This is a formal objection to the inclusion of land East of Metcalfe Lane as suitable for the siting of wind farms. This objection can be read in conjunction with the wider Liberal Democrat submission analysing the flaws in the proposed plan.

In the interest of brevity I would refer to submission 1 in regards the use of the land for housing. Points of particular relevance from that submission are

- Design and Conservation
- Public Opinion
- Consultation – with the additional comments that maps circulated to households outlining areas of development failed to show the proposed sites for wind farms.

Annex B

Total signatures: 1149

	Name	Comment
1	keith orrell	
2	Nigel ayre	
3	Keith Hyman	
4	Sean Leetham	
5	Steve Buckton	
6	Will Huffer	
7	Matthew Huffer	
8	Neil Martin	Neil Martin, moved to York 3 years ago. I have made friends for life through this great club.
9	Traci Leetham	
10	Guy Wilkinson	
11	Anthony Green	
12	Deborah Ogden	My Nephew and brother play for Heworth Cricket club !!!
13	James Girolami	
14	John Brown	
15	Paul McHugh	
16	Liam Sweeney	
17	Ciaran Ferris	
18	Bryce Robertson	
19	Gordon Walker	Great ground and would be a major loss to the sport. You can play hockey anywhere, it takes decades to make a good cricket ground.
20	Josh Binns	
21	Wendy Mckenna	Great local club and it would be a travesty for it to move
22	Gary Hall	
23	Nicholas Brunner	
24	Sam Tilston	
25	Finlay Scott	

26	Dan Nicholson	This was a fantastic club when I was growing up means so much as my father died in the car park there and my grandfathergrandfaythers ashes where scattered there also as he was a massive part of cricket throughout York and coached so many young guys still playing the game today
27	Umair Mohammed	
28	Lisa Lea	
29	Graeme Garden	
30	Susan Martin	My son plays cricket for Heworth and we visited the ground last year. It's an attractive ground and a great facility. Would hate to see it go.
31	Rich Winterburn	A huge part of the community for both children and adults. A safe place for children to go with excellent facilities and coaches for them to develop their cricket. Why take away something that has been there and part of the community for years for yet more houses. Carry on like this and all sport in York will be gone. Disgrace if this goes through.
32	Graham Purdy	
33	Paul Evsns	What will we leave for our children They need sport
34	Dave Shanks	
35	Adam Morley	I've played here many times and it would be a huge loss to the cricketing community
36	Gavin Martin	
37	Steve Gillies	
38	Damian Davies	Please save our beloved Cricket Club.
39	David Martin	Have been to watch cricket at Heworth on visiting York. Nice ground and made welcome. Hockey club need to work on fundraising to match their needs rather than remove a ground and club which will never be replaced. With around 12 hockey teams in their club a combined approach to fundraising would perhaps benefit their club as well as the community. The search for improvement and elite performance seems to be ignoring the need to preserve grassroots sport for locals.
40	Lee Clarke	
41	Wayne Foster	
42	Olly Sherwood	
43	Lloyd Jones	
44	Alfie Oliver	

45	Jason Gatus	
46	jim brannigan	Sad to see a club trying to make the community better put into this situation
47	Joel Clarke	
48	Joanne Clarke	
49	Jack Heartshorne	
50	Maria Matthewson	
51	Jacky Gillies	
52	Ollie Tweddle	
53	Kyene Paton-Campbell	
54	Lee Ford	
55	Jamie Ulliott	
56	David Heartshorne	
57	Lewis Meek	
58	Ryan Diver	
59	Paul Hemingway	
60	Rob Horseman	I have many happy memories playing cricket for heworth and met some great people, elmpark way is one of the best grounds in yorkshire
61	Dawn Whitley	
62	Jessica Hemingway	
63	Kev Atkinson	
64	Katie Collins	
65	Lee Bradshaw	
66	Laura Bruce	
67	Nikki Foster	
68	Kim Walton	
69	Jayne Goldsmith	
70	Ian Wilson	Spent some happy years at this club especially when I was younger they have sent out many fine cricketers over the years and seen much success it would be a very sad day should they need to move from Elm Park way
71	Ryan Whitley	
72	Ian Wilkinson	
73	Adam Precious	
74	Paddy Slade	

75	Matt Hume	
76	Dan Davison	
77	Richard Francis	A cracking cricket club which has its priorities set on developing young and aspiring cricketers in the local community . It will be areal shame to see this old established club re locate to another area .
78	Tara Kay	
79	Thomas Fort	
80	Carol OBrien	Hands off. Preserve our city of York. And our priceless heritage. Cricket runs through the very veins of our County. No more of it. Preserve Heworth Cricket. And itâ€™s pitch.
81	Paul Whitley	
82	Stephen Foster	Stephen Foster
83	Cliff Batt	
84	Thomas Gardner	Junior participation in sport gives kids a place to let off steam and socialise
85	Ian Lynch	
86	Sam Eastwood	
87	Jaymee Clarke	
88	Georgina Clayton	
89	Will Etty	
90	Harry Sturdy	
91	Maxwell Carry	
92	Luke Huffer	
93	Kathleen Hodgson	This is an important part of York's history. It is worth preserving for the local community.
94	Julia Wilkinson	
95	Karen Ulliott	
96	Aidan Horton	
97	Tom Bews	
98	Ryan Rhodes	
99	Jordan Edge	Been at the club since I was about 10 years old, great club with great people !!!! Save HCC 1784
100	Harry Collins	
101	Joseph Moore	

102	Lynne Eshelby	Lynne Eshelby
103	Rob Caulfield	
104	Craig Atkin	
105	Harry Stewart	My mate Rymer got 208 runs and holds the record what a man!
106	Ruth Harvey	
107	Will Rymer	Iâ€™ve played at heworth since I was 10 years old and itâ€™s always been one of the biggest clubs in york. Do not change this club!! #hcc #1784
108	Emma Todd	
109	Richard Walton	
110	Susan Clarke	
111	Dan Ellwood	
112	Dave Wilson	A Great Club with so much history, too much green spaces built on. Letâ€™s try and save this wonderful facility for our future cricket youngsters.
113	Harry Thompson	
114	David Ridsdill	
115	William Barratt	Keep HCC going!! #1784
116	Barbara Bradshaw	
117	Niall McCallion	
118	Alexander Clough	
119	Ben Burdett	
120	Naomi Johnston	
121	Elizabeth Mitchell	They do lots of work for charity, including the charity cricket days.
122	Andrew Ramsden	Disgrace
123	Halli-Paige Riley	
124	Faye Massam	
125	Hughie Ferguson	
126	Ellie Katsarelis	
127	Alex Borrer	This is so wrong this club has been the hub of the community since 1784 and is one of the largest cricket clubs in york itâ€™s got to stay there!!!! #1784
128	Georgia Hunt	

129	Ella Hutchinson	
130	James Kenyon	
131	Julie Bell	
132	Mick Liversidge	
133	Daniel Gregory	
134	Baxter Hackett	
135	Ian Bews	
136	Katy Ross	
137	Mateusz Wrobel	
138	Glynn Botterill	This would be a massive loss to cricket and to York, some of the best facilities in North Yorkshire and one of the best junior set ups in the county. They have produced some fantastic cricketers over the years including current Yorkshire player Jack Leaning.
139	James Hutchinson	
140	Lily Pearson	
141	Penny Bestwick	Profit over sporting excellence and enjoyment has no room in this day and age. Please think again York Hockey Club, you are also a club with people who rely on you for their hobby And total enjoyment of Sport.
142	Alice Dunlop	
143	Gemma Jamieson	
144	Sandra Barratt	Heworth cricket club host many of our York Learning adult learning courses and without this valuable asset the vast number of local residents who take part would also be losing activities that contribute considerably towards their health and wellbeing and help them remain socially active and included - our thanks and good wishes go to all at Heworth Cricket Club who facilitate this for us
145	Roberto Howcroft	
146	Sam Stead	
147	Philip Robshaw	
148	Toby Bell	I live nearby and it is a fantastic club.
149	Mobien Akhter	
150	Lizzy Morritt	
151	Anna Holman	
152	Sophie Shaw	
153	Jovi Bunce	Great memories, great crisps

154	Arron Solanki	
155	Beverley Precious	Outraged.... what's going to be left for the local people lived in this area all my life my family brought up here and went to local schools heworth cricket club has always been part of the community what's going on!!! I live near derwent Thorpe and believe me that's bad enough all I can say is a diverse community!!! Where's it going to stop
156	Jasmin Horwell	
157	Claire Huggins	
158	Claire Solanki	
159	Adam Lovett	Adam Lovett
160	Jake Stanworth	NO MORE HOUSES IN YORK
161	Chris Barratt	This is a disgrace that there even has to be a petition on this. One of the best facilities in the york area
162	Jill Baker	This can't happen to a thriving sports club and Community venue.
163	Isaac Clark	
164	Martyn Hewitson	
165	Joshua Shaw	
166	Saffron Horwell	
167	Joseph Walker	
168	Nathan Brown	My mate tom Morritt uses this facility and has a been a memeber for a number of years. Would mean a lot if you can help save it for him and others. I used to use this facility growing up and itâ€™s nice for the development of young cricket talent within our community
169	natasha Blowers	
170	Lucy Sherwood	
171	G Dobson	
172	Beth Blanchard	
173	George Brown	
174	Lewis Stote	I wish I was there myself
175	Gemma Woodrow	
176	Tom Morritt	Life long member and committee member for a club that means so much to me and my family.
177	Nick Ashdown	

178	Alison Bell	My children have played here since they were 5 please do not take this away.
179	Lucy Archer	
180	Emily Hampton	
181	Olivia Garnett	
182	Sam Beaumont	
183	Simon Acomb	
184	James Lee	
185	Chris Teeling	
186	Claudia Shaw	
187	Will Ravenhall	Played for the club since I was a little boy, it's not just a cricket club it's a family. Long live HCC
188	Mitchell Williams	
189	Will Outhart	
190	Alex Stone	
191	Shea Hartley	
192	Will Fryer	
193	Bob Procter	Losing sporting clubs like this leads to the demise of communities. Although not a member of the club I have always enjoyed and been made to feel welcome there.
194	Dylan Mason	
195	Chris Bradshaw	
196	Jack Gabbatiss	
197	Steven Patterson	
198	Nicola Chappell	
199	Graham Cooper	
200	Jack Wilkinson	
201	Robert Carlill	
202	Jake Field	
203	Jack Charters	
204	Steve Jarman	
205	Lindsey Gumley	
206	Diane Meek	
207	Jonathan Corcoran	Please keep the club going, a fantastic multi sport facility.
208	Martin Hartley	

209	Peter Fairburn	
210	Josh Berry	
211	Jerry Dunnington	
212	Alicia Brunner	
213	Emma Rowsby	
214	Jon Wright	This can't be allowed to happen.
215	Craig Burt	
216	Joe Ashdown	This cannot happen!!!
217	Ryan Boyes	
218	Lauren Brown	
219	Darren Lovatt	<p>Unbelievable !!! Such a great club and facilities surrounded by all that green space. Build elsewhere!!! Surely in this modern era it's important that such a great facility exists bringing through the many many youngsters to a sometimes very high sporting standards. The cricket and football exists for the local communities and forms an integral part of the local leagues in which they play.... leave it alone!!</p> <p>Darren Lovatt</p>
220	Xareen Ashraff	
221	Nick Tregoning	Fancy it?
222	Lisa Percy	
223	John Anderson	
224	Paul Glover	
225	Andrea Moore	Heworth cricket club is a huge part of my children's lives and provides much pleasure to many families. In an era when we need to get children off their computers and outside for recreational activities facilities such as Heworth Cricket club are invaluable. Save Heworth Cricket Club.
226	Chris Gartland	
227	Ben Alexander	
228	Emma Judge	
229	Will Batt	
230	tracy hills	
231	Dave Hammond	
232	Adam Livingston	
233	Rob Richtering	

234	George Wilson	
235	Ben Lack	
236	Hayley Routledge	Hayley Routledge
237	Des Healey	
238	Fiona Bell	
239	Alex Bell	
240	Ben Morrith	
241	Joshua Morrith	
242	John Snowden	John Snowden
243	Richard Davis	
244	Lynda Johnson	
245	Mark Welch	
246	Rebecca Waterworth	
247	Holly Boyle	
248	Sarah Smith	
249	Jeremy Schooling	
250	Katie Roberts	
251	Hannah Cox	
252	Charlie Fort	
253	Mae Tipping	
254	David Booth	
255	Owen Marshall	
256	Grace Birch	
257	Helena Matravers	
258	Aimee Thompson	
259	Grant Lorimer	Under no circumstances let this happen
260	Jean wrighton	
261	Eve Merriam	
262	Zak Moorcroft	
263	Paul Sellers	
264	Adelaide Wood	
265	Magnus Fielding	

266	Michael Bristow	
267	Steven Sissons	
268	Simon Oliver	
269	Helen Leavey	Helen Leavey
270	chris gayles	This will also mean that Elmpark Junior Football club will be without a home. We have 4 football teams at various age groups that come from the local community. The cricket club and members provide us with the best pitches in the league and a fantastic welcome for visiting teams. Providing hot drinks and hot sandwiches on cold mornings and every other morning one or more of the teams are playing at HOME. I started coaching at this club because of everything that the football club and the cricket club stands for. We provide a vital community service. Allowing young people to enjoy sport in their own community. Without this most of the children would not get the chance.
271	Yvonne Le Huray	
272	Josie Turner	
273	Georgina Piercy	
274	Graham Hursthouse	
275	Ben Goodliffe	
276	Emma Hayward	
277	Matthew Wragg	I played for Heworth for 35 years and my Dad played before that. This would be a disaster. The place provides so much to young people in the area.
278	Holly Lawson	
279	Allan Perry	
280	Iona Adam	
281	Andrea Jones	
282	Sarah Hall Baqai	How could York Hockey Club even contemplate this given its role in the community?
283	Mia Campbell	
284	Sam Vale	
285	Mollie Piercy	
286	Shana Harrison	
287	Gavin Clark	Great memories learning to play cricket here in the late 70s and early 80s. Don't let this great club and sporting facility for the people of today go to line the pockets of landowners.

288	James Beevers	
289	Sally Wallace	
290	Leoni Shaw	
291	Helen Hudson	
292	Leanne Bates	
293	Alice Wainwright	It's a lovely place don't get rid of it
294	Kevin Barker7	
295	Patrick Randall	
296	Andrew Hall	Andrew Hall
297	Simon Powdrell	
298	Brian Harris	
299	Sean Holmes	
300	Andrew Bates	
301	James Pick	
302	Jonathan Dilks	
303	MD nahim Alam	Hello Im from Sheffield I played cricket in England South Yorkshire leauge since 8years so my opinion is i think cricket ground is better coz its oldesr cricket club.
304	Joel Johnson	
305	Rachel Gumley	
306	Gary Bell	
307	David Simpson	
308	Jamie Ross	
309	Andrew Simpson	
310	Heather Harrison	
311	Jack Hugill	
312	Oli Batt	
313	Tom Neal	
314	Guy Mowbray	Properly learned to play a sport I've loved all my life as a proud Heworth CC junior player. Have since seen loads of kids come through the club having benefited from expert coaching at the club. It's part of York's sporting heritage.
315	Peter Paton	

316	David Tute	Shocking selfish proposal. Heworth has one of the finest cricket grounds in Yorkshire, providing superb facilities for young and not so young. This news has really hacked me off despite my clubs long time rivalry with Heworth. Acomb CC won a similar battle years ago. I hope our rivals get the same outcome.
317	john bonarius	This club is a brilliant family club, it cannot be allowed to die, in the scandalous way the civil service sports club and british sugar sports clubs have been allowed to die. Remember the olympic legacy...sport for all....
318	George Brown	George Brown
319	Elaine Grant	
320	Joe Wright	
321	Jack Pearson	
322	Alan Baldock	Fulfordgate CC & WIXI CC
323	Eliyah Green	
324	Duncan Clark	
325	Richard Woodmansey	
326	Eric WinterburnWinterburn	
327	Arthur Champion	
328	Jonathan Stevens	
329	Archie Morter	
330	Livia Avey	
331	Colin Sanctuary	
332	Carol Suchecki	
333	Hannah Lyus	
334	Patricia Hodgson	
335	Andy Kenyon	
336	Philip Darley	
337	Emma Hammell	
338	Danyal Ismail	
339	Gaz Jaques	
340	Stuart Dawes	
341	John Petrie	
342	prasenjeet chakraborty	

343	William Roddham	
344	Nele Haendlmayer	
345	Joseph Paton	
346	Tom Francis	
347	Mark Schofield	
348	Stephen Rymer	
349	Graham Knott	
350	Charlie Lambert	
351	Lauren Smith	
352	Sue Harris	Kids need to be outside in the fresh air playing instead of sat on computer playing games
353	Tom Wilson	
354	Nigel Currie	
355	Robert Draper	
356	Roy Morton	Disgusting more playing fields to be built on
357	Rob Smith	Rob Smith:
358	Michelle Dunnington	My Dad is the groundsman of Heworth Cricket club my whole lifetime he has and still works here . Still giving his time and effort , and doing a great job as ever . A community asset to be lost for Heworth too . I am shocked to hear of this news .
359	Jennie Gatus	
360	Jack Leaning	
361	Olivia Garnett	
362	andrew bonarius	
363	Jonathan Traves	
364	Isobel Avey	
365	Jonny Uttley	
366	Jon Bladen	
367	paul Graham	
368	Alex Lilley	
369	June & Keith Larcum	
370	James Culley	
371	Vicky Sellers	

372	Anne Petrie	Club should be saved!
373	Chris Williams	Sporting grounds and clubs are worth more than housing
374	HArvey Creaser	
375	Isaac Wilson	
376	Elke Witter	
377	Rob Taylor	
378	David Taylor	
379	Joanne Winterburn	JOANNE WINTERBURN
380	Rebecca Mahon	Rebecca Mahon
381	Tasha Plumb	
382	Steven Ovenden	Saddened to hear one sports club plans to force another out of its home . Shame on you City of York hockey club !
383	Rachel Hildreth	
384	Mark Lynch	Good work Nigel and Lee..
385	Anne Lewis	
386	Jason Cruse	
387	Amy Magee	
388	James Mulhearn	Also ElmPark football club use these facilities from August to may and we won't have a home to play our games either.
389	David Brannan	
390	Matthew Phillips	
391	Hannah Breheney	
392	Paul Stimpson	
393	Kirsty Lund	
394	Carolyn Faulkner	
395	Ian Philliskirk	
396	Paul Atkinson	
397	Tom Magee	
398	Philip Hall	
399	Andrew Waller	Andrew

400	Adrian Pickup	
401	Beverley Hadfield	
402	Jodie Whitley	
403	Rob Zabrocky	
404	Graeme Sherlock	
405	Amanda Taylor	Please don't sell! Sport is so important for all to enjoy especially our children
406	Liam Witney	
407	Evie Knight	
408	Bertie Kennedy	
409	Jeff Wilson	Enough, people need space to play sport this is the oldest club in York.
410	Keith Pepper	
411	Chris Blanchard	Played there a couple of times. Great set up and would be a disgrace if this place no longer existed
412	Matt Hawksworth	
413	Wendy Warhurst	Great community area for children and adults to achieve together
414	Tom Atkinson	
415	David Ward	
416	Paul Scholes	
417	Sewerby Cricket Club	
418	Clare Freeman	Used to do the cricket teas when I was a lass there and had my birthday party there too.. never mind bloody houses there's enough of them shoved up in stupid tiny spaces!!
419	Phil Neilson	
420	Jake Cakaunitabua	
421	Michael Brent	
422	Paul Wilkinson	
423	Richard Marshall	
424	Graham Morritt	
425	Andy Guy	
426	Danny Collinson	
427	Andy Laws	
428	George Powell	
429	George Baty	

430	Megan Heather	
431	Patrick Slade	
432	Martin Devlin	Shame to lose another cricket club in the area
433	Neil Darley	All the best HCC from all at Selby Cricket Club
434	Coleen Allison	
435	Julie Mincher	I'm sure York can survive without more new housing, local cricket clubs make a huge contribution to their areas & need protection from greedy councils & property developers.
436	Briony Costello	
437	Jonathan Partington	
438	Katie Purdon	
439	Ben Kohler-Cadmore	
440	Paul Knott	
441	dean starkey	
442	Derek Chadburn	
443	Tabbie Harris	
444	Alexander Boyes	Alexander Boyes
445	Thomas Leach	Great club, deserves better!
446	Ted Wilman	
447	Dom Lloyd	
448	Mick Cadmore	
449	Jamie Kemp	
450	Richard Gibson	This is a club at the heart of its community. Do not let it stop beating.
451	Emma Lindley	
452	Andrew Kaye	Andrew Kaye
453	Jasmine Threapleton	
454	Ian Richardson	
455	Phil Dodsworth	
456	Mark Steele QC	Please no! Have some respect!!!!
457	Lexy Ilsley	
458	Jamie Roe	

459	Chris Liversidge	The sale of sports fields and clubs for development contravenes all the evidence we have for the benefits of exercise on physical and mental wellbeing. The social and community implications are also immeasurable. This club must remain!
460	Ian Clark	
461	Frederick Storr	
462	Malcolm Pile	Save our cricket grounds.
463	Jack Eggett	
464	Heather Chew	Heather Chew
465	Richard Giles	
466	Liam McKendry	
467	Rod Moorcroft	
468	Jimmy Redpath	
469	David Farmer	
470	Karl Carver	As a Yorkshire County Cricket Club player, I am aware how much club cricket does for up and coming cricketers. Or even children who enjoy the sport, being able to play at a local club is such a massive achievement and part of their lives. Even for adults who play on a weekend it is an escape away from their everyday life. Please don't ruin the great game of cricket for those individuals.
471	Andrew Brown	
472	Charlie King	
473	Wendy Sykes	
474	William Spencer	
475	Nick Janney	
476	Keith Blagg	Played against Heworth in the 1970's.
477	Sam Lea	My love for Heworth cricket club grows each year, the community that has been built around it is unbelievable and it wouldn't be the same if the club was to be relocated. The club makes up a large part of the history of my life and if it was to be moved I feel like it would ruin those memories and also the chance for future generations to excel in such a wonderful sport
478	Jon Purr	Played there for hull zingari great ground for cricket , plenty of land around York no need to take this excellent sporting facility away

479	Samuel Thompson	
480	Carolyn Taylor	
481	Patricia Fowler	
482	Gray Wilton	I grew up around a local sports club. They are integral to the communities they serve. Keeping children off the streets with sports and bringing people together
483	Laura Gibson	
484	Dan Nicholson	
485	Holly Gillett	
486	Wendy Wright	
487	Beth Allison	
488	Liam Hancy	
489	James Lunn	
490	Jack Brooks	
491	Ian Savory	Ian Savory - Treasurer - Methley Cricket Club
492	Jeremy Dobson	
493	Ben Twohig	
494	Tom Barrett	
495	Charlotte McDermottroe	
496	Gary Chapple	
497	Jim Henderson	
498	James Gumley	
499	Shaun Conway	
500	Tom Barnicle	
501	Phil Beaver	
502	Phillip Skilbeck	I played against Heworth in the 80's before leaving York. Once it's gone it's gone forever.
503	John Lyne	
504	Benjamin Irving	
505	Mark Smith	
506	Graham Freer	Enjoyed many hours playing Cricket at Heworth. A great club, hope that the petition works and that the Hockey club have a change of heart.
507	Aimi Brookes	
508	Steve Webster	
509	David Hartley	

510	Matt Maule	
511	John Clark	
512	Mark Fisher	Donâ€™t sell this land!! It is very important for young people
513	Chantal Rudkin	
514	Graeme Wilkinson	
515	Giselle Brannan	We need youngsters to get off the couch and play .. donâ€™t restrict their options!
516	Amy Maskill	
517	Bob Cartwright	My home town. Played there often. Too important to lose. Make the ground a focal point of development and social interaction for the surrounding community
518	Laura Simpson	
519	Liza Patel	
520	Ellis Champion	
521	Jed Horne Weston	
522	Anna Orr	
523	Sue King	
524	Peter Foxtan	
525	Mark Camidge	
526	Sam Chapple	
527	Alice Worsley	
528	Andrew Copeland	The area is dense enough with housing at needs this important recreational facility.
529	Emily Thomis	
530	Abby Coulson	
531	Peregrine Pocock	
532	Dan Waterworth	
533	siddhant bansal	
534	Rob Horbury	
535	Lizzie Sweetinf	
536	Ben Smith	
537	Chris Ward	
538	James Stirling	
539	Ellie Robson	
540	Emma Fairburn	

541	Steve Jackson	Meep the area as it is
542	Martin Revill	I've played cricket at Heworth for Knaresborough. I have been involved in club and league cricket for over 35 years, and never has club cricket been so under pressure as is it now, with fewer players and many clubs struggling to retain their teams. Quite shocking therefore that this proposal comes not from a commercial developer, but from another amateur sports club. Quite appalling.
543	Jane Hildreth	
544	Stephen Robinson	
545	Deirdre Bailey	
546	David Scurfield	
547	Alban Foster	
548	Jamie Blackburn	
549	Ellie Cowley	
550	Richard Mahon	This is where my son Ethan has played football for Elmpark for the last 3 years and has been great for him physically and mentally making lots of memories and friends. His brother Matthew has started for the under 7s this year too be such a shame to loose this venue which so many local people use and enjoy, it would be a real shame for all the coaches and club staff who put time and effort for the club and children and adults involved.
551	Lisa Thistlewood	
552	Liam Holgate	
553	Ritchie Bresnan	
554	Matt Green	
555	woodthorpe christope	
556	Kevin Wilson	
557	Steve Llewellyn	
558	Neil Tappin	
559	George Conway	
560	Nick Appleyard	
561	Martin Robinson	
562	Tom Owens	
563	Janet Lynch	I have spent many a happy hour supporting the junior and senior cricket teams I think this is an outrageous decision by the Hockey Club.

564	Pete Brandon	
565	Emma Foster	
566	Kevin Philliskirk	Kevin Philliskirk
567	Danielle Brown	
568	Sue Beaver	
569	Nathan Jackson	
570	Lucy Holmes	
571	Andrew Hay	
572	Jordan Grose	
573	James Blacknell	
574	Harrison Mussell	
575	Robert Lynch	Heworth cricket club have put in many hours of work raising funds and maintaining the club with the Hockey club doing nothing to the ground. The cricket club deserve a much better deal than what is currently being offered.
576	Sean Pickles	
577	Liam Davies	
578	Dean Window	Dean Window - good luck .
579	annette hickman	
580	Craig Hewson	
581	Neil Greenhalgh	
582	Adrian Wisniewski	Sports are at the heart of the community. They deliver significant early intervention and prevention outcomes which have a major impact on health and wellbeing. Not least of these is a positive effect on reducing loneliness and isolation. All of these combine to have a major positive financial impact which would otherwise be borne by the NHS and local authority. Short term gain for the few v major long term savings is the choice being made.
583	Brian Butler	
584	Sue James	Much need by local community
585	Ella Dunning	
586	Sam Tattersall	
587	Beck Smith	Donâ€™t do it

588	Chris Smith	
589	Jade Stones	
590	Adam Fisher	
591	Stewart Guy	
592	James Thompson	
593	David Mcdermottroe	
594	Paddy Mulvey	
595	Wayne Mcleod	
596	Jared Warner	
597	Thomas Fort	
598	John Middleton	
599	ChloÃ« Morritt	
600	Josh Clark	
601	Sharron Thompson	
602	David Grundy	Played here a few times. Always friendly club. Good luck
603	Libby Littlechild	
604	Daniel Walton	
605	Nick Robinson	
606	Jason McKinley	
607	Rebecca Coop	
608	Thomas Hitchenor	
609	Emily Joyce	
610	Tom Wilson	
611	Dani Beales	
612	Matthew Fisher	
613	Helen Taylor	
614	Tristan Batley-Kyle	We should be looking after our sporting facilities and keeping people of all ages doing physical activity, not building on them
615	Reece Milner	
616	Mark Wakeling	We need to do everything we can to save community assets like Heworth Cricket Club.
617	Ryan Lea	
618	Henry Wardell	

619	Adam Hewitson	
620	Chloe Loggie	
621	Ian Robertshaw	
622	Steve Thomas	
623	Scott Easton	
624	Lucy Chapman	
625	Mark Bradley	
626	Pat Jones	
627	June Mclellan	
628	Kieran Bloor	
629	Michael Ash-McMahon	
630	Rhian Milner	
631	E Balding	
632	Alastair Markham	
633	Danny Mulhearn	
634	Mark Hudson	We need to keep cricket grounds as they are key to keeping kids playing the our national game
635	Jenny Greenwood	
636	Lynn Woffenden	
637	Malcolm Pepper	
638	Chantel Thornton	
639	Catherine Manniom	
640	David Revill	
641	Tracey Preece	
642	Ruth Patterson	
643	Damian Loggie	
644	Robert Kay	
645	Eleanor Roebuck	
646	Emma Grundy	
647	Joseph Padmore	
648	Helen Blacker	
649	Julie Holdsworth	
650	Henry Robinson	
651	Neil Claxton	

652	Emma Cornhill	
653	Andrew Bucklee	
654	Alex Drago	
655	Jonathan Anderson	
656	Stephen Royle	
657	Maureen Robinson	Not from York, but I am a Yorkshire girl (Leeds). We need to keep these local teams going.
658	John Myers	
659	Andy Leaning	
660	Lydia Harrison	
661	Adam Sutcliffe	
662	Rik Patel	
663	Michael Pickering	
664	George Gregory	
665	Judy Carr	
666	Kirsty Stothard	
667	Stephen Harrison	
668	Alex Pyrah	
669	Victoria Milner	
670	Gill Mallon	
671	Lynn Munro	
672	Taneth Russell	
673	Stew Molyneux	Please save the club as Cricket Clubs are the heartbeat of a village . Too many houses and not enough playing fields
674	Matthew Sykes	
675	Rob Green	
676	Henry Worrall	
677	Rebecca Dempsey	
678	Hannah Vernon	
679	Rich Milner	
680	Niamh Brannigan	
681	Abbey Wright	
682	George Thompson	
683	Charlotte Bucklee	
684	Tracey Stevens	

685	Sandra Pogson	Any organisation that keeps children off the streets away from danger is worth saving, I hope you get the result you want.
686	Joyce Stockton	
687	Jesmini Gathani	
688	Amanda Davison	
689	Rob Kay	A great cricket club and an asset to your community
690	Farzana kosar	
691	Callum Childs	
692	Simon Collins	
693	Cheryl Craven	
694	Geoffrey Ellis	Great history --excellent club and facilities, this land within York City must be retained for recreational purposes.
695	Michael Burdett	
696	Mike Sibley	
697	James Green	
698	Ian Maskill	Save these small clubs! They are the grass roots of English cricket!
699	Jake Thompson	
700	Chris Beaumont	Chris Beaumont
701	Jevan Medlock	Keep cricket alive in Yorkshire.
702	George O'Neill	
703	Alex Rippon	
704	Harry Stothard	
705	Steve Wilson	
706	Steve Denison	
707	Stefan Solanki	
708	Matthew Haslam	
709	Simon Brown	
710	James Himsworth	
711	Neil Foster	
712	Joanne Brown	
713	Thomas Brown	
714	Richard Gomersall	

715	Ben Carter	
716	John Frobisher	
717	Lainey Robinson	
718	Michael Watson	Cricket and the community go hand in hand. Leave it that way. Leave Heworth Club alone.
719	Paul Harrand	
720	Graham Hogben	
721	Matt Shackleton	
722	Jo Ingham	
723	Alison Pickersgill	
724	Tom Forsdike	
725	Shaun Clappison	
726	Rob Marshall	
727	Neil Ives	
728	Julie Gothard	
729	David Gibson	
730	Madison Dews	
731	Nikki Hutchinson	
732	Robert Oakley	Good luck!
733	Ian Dews	Local clubs offer so much to the people of the City.
734	Tom Webster	
735	James Postill	
736	Matthew Watson	
737	James Carlill	
738	Phil Prince	Wonderful supporter of schools and youth cricket
739	Rachel Parkinson	
740	Joanne Mann	
741	Pat Coffey	Good Luck
742	Stephen Berry	
743	Tom Astle	
744	tracy buckley	
745	Estelle Bradshaw	

746	Ian Moore	The cricket club provides a valuable and much needed social and sporting venue for our local community
747	Anthony Garland	I've played at Heworth for Hull Zingari Cc and this ground deserves to be saved for the local community.
748	Jo Pitcher	Keep local sport alive.
749	Sarah Jenkinson	Cricket is a great sport and develops kids confidence so much. Don't let this happen.
750	Rita Wakley	
751	Kirsten Ovenden	
752	Charlie Winterburn	
753	Sue Snell	
754	Daniel Leveson	
755	Rianne Wartnaby	
756	Caroline Clark	
757	Natalie Ovenden	
758	Dirk Odendaal	
759	sophie .	
760	Matt Downing	
761	James Stephenson	
762	matthew barton	
763	Joe Thorpe	
764	Kewell Ford	
765	Paul McFarlane	Cricket is a brilliant sport to keep youngsters off the streets and bind a community together.
766	Richard Howard	
767	David Hook	
768	Justin Thangarajah	
769	Lucas Metcalfe	
770	Arthur Boyce	
771	Emily Thorpe	
772	Lucy Hickey	
773	Denise Knox	
774	Kayleigh Jones	
775	Paddy	
776	Clare Hitchen	

777	Debbie Ede	
778	Debbie Massam	
779	Josh Benson	
780	Dan Andrew	reference - dellwood
781	Sam Browne	
782	Claire Walker	
783	Matthew Metcalfe	
784	Andrew Spink	
785	Aaron Wood	
786	David Bowling	
787	Michelle Bowling	
788	Claire Ashton	
789	Ojas Pandey	
790	Andy Mcintosh	
791	Jane Moorby	
792	Stuart Cutmore	
793	Steve Crowder	Any council that grants change of use to recreational land should be ashamed of themselves. No change of use = no value to sell. Simple
794	Bronte Lorimer	
795	Andrew bruce	
796	Deborah Hollingsworth	
797	David Stringer	
798	Kim Middleton	
799	James Richardson	
800	Ella Mclaughlin	
801	Chris Priestley	
802	Stephen Baxter	
803	Thomas Mackriel	
804	Steve Hudson	
805	Steve Burdett	
806	Justin Moss	
807	Amanda Solway	

808	Jem Stephenson	Even as a Lancashire supporter, it is wrong to see things like this.
809	Janet Bullock	
810	David Horton	
811	James Carroll	Best of luck with the petition, from Abberton & District CC in Essex
812	Ben Brannigan	
813	Rich Williamson	
814	Vanessa Maule	
815	Alison Nield	
816	Sue Coad	
817	Arron Poole	
818	christopher storey	local cricket is important in Yorkshire save hemworth cricket club.
819	John Catling	
820	Caroline Hancy	
821	Lindsey Male	
822	rachel thistlewood	such a shame ! hope they reconsider
823	Rick Dower	
824	Charlie linfoot king	
825	Karen Jackson	
826	Andrew Precious	
827	Darren Smith	
828	Tom Yates	
829	Tom Hodgson	
830	Alex Burt	
831	Mark Astle	
832	Adam Hargreaves	
833	Paul Nicholson	
834	Josh Moate	
835	Kath Dodds	
836	Rupert Evans	
837	Neale Holmes	

838	David Ward	
839	Barry Hainsworth	
840	Chris Burch	Heworth Cricket Club provides numerous opportunities for adults and children in the community to play and enjoy Cricket and many other activities.
841	Karen McNamara	
842	Paul Coffey	
843	Sandra Caisley	
844	Iris Lockwood	
845	Neil Telkman	Cricket clubs provide an important community resource across all age groups and genders. We shouldn't lose any cricket grounds to development.
846	Rich Rowntree	
847	Demi Leetham	
848	Benjamin Barker	
849	Paul Leetham	
850	Paul Griffiths	Heworth Cricket Club can publish though.
851	Roshan Ratnayaka	Don't do it. Let's save it for the kids!
852	Paul Blackwell	
853	Matt Little	
854	Gilli Little	This is a valuable green space for local residents and their children and should be preserved for future generations!!
855	Jessica Massam	
856	Chris Bird-Butler	
857	Alison Stevens	
858	Peter Johnson	
859	Andrew ezard	Andrew ezard
860	James Howells	
861	Richard Bowling	
862	Joe Reeve	
863	John Lumley	
864	Harry Potts	Good luck no club deserves to go down to housing development.
865	Gwendoline Grimsdale	

866	Liam Tharme	
867	Andrea Hedgcock	
868	Abdur Patel	
869	Keith Anderton	
870	Jennifer Loggie	
871	Joe Harland	
872	Adam Sloane	Cricket Clubs are a huge part of any community and bring people together, so to take the oldest cricket ground in York away would be sheer Idiocy.
873	Daniel Hesford	
874	Christine Shann	
875	Tim Mansfield	
876	Donna Jameson	
877	Peter McCarthy	
878	Matthew Jones	
879	Fiona Himsworth	We need to retain accessible open sports fields across the city.
880	Martin Jenkins	Disgraceful example of profiteering at the expense of a well established, community sports club. You have the full support of our cricket club in Bradford, West Yorkshire
881	Adbi Ahmed	Save HCC
882	Dexter Lynch	Up the Hcc
883	Sue Lord	So many children have enjoyed this facility over the years, focusing their energies in a positive way, which is so important for all communities.
884	Carole Meggitt	
885	Andrew Davis	
886	Steven Borrow	
887	David Leckenby	
888	Rich Laycock	
889	Hazel Wallace	
890	Ian Smith	
891	Charlotte Herald	
892	Amy Rowntree	
893	Steve Woodley	

894	Kevin Murphy	
895	Eve Parkinson	
896	Jonathan Draper	
897	Andrew Draper	
898	Toby Tegetmeier	
899	Jane Miller	
900	Claire Theyers	
901	Angela Judd	
902	Helen Collins	Both my sons were juniors here. What a shame if this place is lost. Kids really benefit from sport
903	Richard Barker	
904	Lisa Featherstone	
905	George Dobell	
906	Joe Moore	
907	Megan Williamson	
908	Tim Davis	
909	Tom Stanwix	
910	Laura Manley	
911	Philip Hunton	
912	Jo Battson	
913	Phil Bradbury	
914	Dane Winn	
915	Sharron Webster	Sharron Webster
916	David Ryan	Stop selling sports grounds
917	Steven Mullaney	
918	Andrew Hall	Building on playing fields is wrong and as a father of a keen cricketer I sympathise with this club
919	Phil Howden	An excellent club and facility that should be kept for future generations.
920	Mhairi Dunn	
921	Tom Young	
922	Aniruddha Kambhampati	
923	Lucy Hyde	
924	Julie Macfarlane	

925	Ian Watkinson	Ian
926	Mark Jones	
927	Emma Nelson	
928	Sean Healey	
929	James Smith	
930	Sam Shepherd	
931	Chris Easby	
932	Ryan McKendry	
933	Nicola Taylor	
934	Dave Watson	cricket is a community game which brings so many things at all different levels. I can trace my team spirit and courage to playing and to rip a club from it community in these trying days is plain wrong.
935	John Flintoff	
936	Adam de Vries	
937	Tom Jenkins	
938	Rosie Harkin-Adams	
939	Chris Maude	
940	Lewis Matthewson	
941	Stephen Tait	
942	David Lambert	
943	Joshua Tattersall	Joshua Tattersall
944	Kevin Jacques	
945	Amanda Marshall	
946	Jo Hossell	
947	Chris Bilton	A fantastic club that offers so many people, young and old the opportunity to not only play cricket. But to socialise as a community as well.
948	Cameron Martin	
949	Jamie Leeson	
950	Paul Barker	
951	Gary Phillips	
952	Katie Dixon	
953	Jamie Parkinson	

954	Ann Bolland	
955	Sara Malin	Sara Malin
956	Rachel Hack	
957	Lucy Pryor	
958	Claire Creaser	This cannot happen. The club is situated on greenbelt land. The club also hosts football clubs too....the government goes on about childhood obesity but is happen to let developers build on our green spaces. Itâ€™s a disgrace
959	Lindsey Taylor	
960	Dan Jones	
961	Michael Hattee	
962	Brian Walter	Brian Walter
963	Helen Clarkson	
964	Dawn Avey	
965	Pat Turner	Pat Turner
966	Jacqui Benson	
967	Julian Hird	
968	Aisha Hepton	All sports facilities should be protected for our children. 9pen space is needed to combat child obesity. Sport is fundamentally important for fitness AND mental health.
969	Claire Douglas	Outrageous selling off all the communities green spaces... shame on you York Hockey club!!!
970	Rosie Creaser	
971	Isaac Pollitt	
972	Lee Geldard	
973	Tracey Ware	
974	Chris Nolan	
975	Christine Nolan	Save the Cricket Club! Young people need healthy community activities. I am Oliver Battâ€™s Auntie in the South.
976	Fiona Bonarius	
977	Laura Sweet	
978	Benjamin Sanders	
979	Howard Robson	
980	Cameron Pye	
981	John Beman	

982	Megan Brunyard	
983	Fiona Hunter	
984	Geoff Brotton	
985	Ethan Gurnhill	no cricket club should be forced to move or fold because of this
986	Martin Smith	
987	Duncan Snell	
988	Rosie Lawson	
989	Natasha Bell	
990	Dan Woods	
991	Tom Cockroft	
992	Alan Tichias	Good luck. K
993	Ken Dawson	
994	David Cole	
995	Oliver Nightingale	
996	Anna Twose	
997	Lee Mortimer	
998	Josh Summerscales	

999	David Brummitt	David Brummitt
1000	Paul Scaling	
1001	Rowan Tait	
1002	Sam Elliot	
1003	Veronica Richards	
1004	Matthew Maltby	
1005	Nicki Southon	
1006	Sarah Hartley	
1007	Katrina Brown	
1008	Shirley Smith	Shirley Smith
1009	Jonathan Reed	
1010	Trevor Walton	

1011	Sheila Smith	There is a lack of sports facilities across the City. Schools have sold off their playing fields over the past 30 decades and our youth suffer the lack. Also valuable playing spaces for adults at the weekend.
1012	Zeeshan	
1013	Jane Wiles	
1014	Neil Goodridge	
1015	Callum McGlynn	
1016	Chris Moore	
1017	Alan Sage	
1018	Nabbil Khan	I played there many years ago and was a very good set up. As a cricket lover never want to see any club fold or lose its roots.
1019	Emma Gosling	
1020	Pauline Millington	
1021	Judith Whitley	
1022	Ben Parkes	
1023	Bob Blenkinsop	I developed a love of cricket thanks to the volunteers at Heworth 45 years ago, and still play and coach now. This would be a terrible loss for the community, and local young people who could be lost to cricket.
1024	Jon Barron	
1025	Tim Brierley	
1026	Dave Worthington	
1027	Nigel Burt	
1028	Jj Warriner	
1029	Anna Wolfe	
1030	Penny Coupland	
1031	Denise Newey	
1032	Harriet Collinge	
1033	Patricia Jones	
1034	chris sykes	Good luck, we need to retain as many community assets as we can.
1035	Alison Elliott	
1036	Mark Widdowfield	
1037	Hannah Tym	Don't allow this to happen. We need more facilities like this, not less.

1038	Mick Thompson	
1039	Nick Bernard	Please help to keep this fantastic community facility in place. Both of my children have been lucky enough to benefit from playing for sports teams at Heworth.
1040	Rachel Bernard	
1041	Julie Bresnan	
1042	David Johnson	
1043	Caroline Britton	
1044	Amit Patel	
1045	Brian Taylor	Lived in Heworth for two years. Wonderful Cricket club
1046	Craig Pritchard	Hockey, seriously?
1047	Melvin Wiles	A fab Cricket Club, the youngsters of Yok need these facilities. Get you fingers out and keep the Ground.
1048	Joseph Bute	
1049	Robert Bernard	
1050	Uzair Minhas	Having played here and seeing how young kids come and enjoy, it will be shame to relocation the history and heritage associated with it.
1051	Rebecca Farrow	Firstly this is my family heritage and means a lot to many families in York, my grandfather is even buried there. Secondly and most critically to the campaign this is green belt and there are lots of areas of brown belt that are undeveloped so this much be against regulations and policy to consider building here.
1052	Jules Moor	
1053	Kark Theobald	
1054	Paul Thorpe	Heworth Cricket Club are a long established club, with a thriving juniors section and are an asset to the local community, they need to remain in Heworth on the ground they have developed for so many years, ALL local cricketers should support them, it could happen to your club. Paul Thorpe, Clifton Alliance CC
1055	Duncan McGuirk	Good luck. I live in Essex if I can help please email me.
1056	Nadia Duncan	
1057	Julie Fletcher	
1058	Sheila Overton	
1059	Gary Duncan	

1060	Faye Durham	
1061	Chris Lickiss	Thought was an April fool at first but now signed it.
1062	Richard Knott	Richard Knott
1063	samantha dixon	
1064	Louise Cooper	
1065	Dominique Cooper	
1066	Dileep Patel	
1067	Loretta Gaskell	Loretta Gaskell
1068	Paul Mussell	
1069	Matthew Howcroft	
1070	Jason Greaves	
1071	Scott Rice	
1072	Steve Tait	Steve Tait
1073	Michelle Calam	
1074	Pauline Bresthwick	
1075	Mary Tym	
1076	Edward Taylor	
1077	Kian Oliver	
1078	John Barron	
1079	Paul Joned	
1080	Abigail Pottage	My son plays for Elmpark JFC and it is a lovely ground. We need facilities for children.
1081	Phil Deighton	
1082	Zisis Biniakos	
1083	Stephen Pottage	it is a wonderful ground and club house. It is important for the community to play football and cricket on this well kept green space.
1084	Elaine Calpin	Precious little for kids to do locally. Don't build over the cricket pitch please
1085	Edward Harland	
1086	Aidan Coulbeck	Hemingbrough cc
1087	Gavin Stevens	
1088	Colin Dinnie	

1089	Rachel McCormack	
1090	Maxine Rowntree	
1091	Ian Place	
1092	Les McCormack	
1093	David Robson	My house backs on to Heworth Ground, and where I have lived for 40 years, during which time I have seen extensive use of the site for both cricket in Summer, and football in winter - next to it is Heworth ARLC. The pitches are not only used by adults, but large numbers of children who live within walking distance of the clubs. The cricket clubhouse also hosts various organisations during the daytime, and therefore a real community resource. Currently under the current development plan both club pitches are show for sporting use, and would it not be better for the hockey club offer to let the cricket club have first choice to purchase, as we need more not less sporting facilities. Also, is the club bar not a community resource?
1094	Ian Middleton	
1095	Michael Lambert	
1096	Tim Dale Lace	
1097	Liz Dyer	
1098	Jim Boyes	
1099	Ed Goddard	#1784
1100	Jonny Allen	
1101	Kieran Birkner	
1102	Bryher Dunhill	
1103	Ronald Godfrey	Apart from the loss of social and sports amenities is the serious Question of whether roads and schools in the vicinity can sustain housing development. There is also the issue of flooding from a raised water table linked seemingly to a Persimmon housing project completed nearby in the recent past.
1104	Paul Deo	
1105	Sarah Hay	
1106	ian Stubbs	Too much sell off, and building going on thank you, leave the amenities alone !
1107	Adrian Wetherill	
1108	Ibo Timur	
1109	Gareth Boyes	

1110	Zhear Ahmed	Zhear Ahmed
1111	Darren Spruce	
1112	Richard Whitelegg	
1113	Ann Mansfield	This would be depriving so many youngsters of the opportunity to learn to play cricket and rugby The clubhouse is used by many other groups We must not let this be closed
1114	Barry Sellers	Barry Sellers
1115	Claire Inch	
1116	Elaine Sellers	susan sellers
1117	Chris Mead	
1118	Mike Ainsley	
1119	Andrew Tweed	Grass roots cricket is so very crucial in developing young talent as well as providing a social environment for all ages. Let's not destroy this for greed for a few people to profit. If one ckub folds it's not long before another folds after this. Good luck to all at Heworth CC.
1120	Peter Rowntree	
1121	Kirsty Edge	
1122	Ian Baldwin	
1123	Jason Wallis	
1124	Emma Sheppeard	
1125	Elkie Buckland	
1126	Melanie Hoque	
1127	Sheila Lunan	
1128	Alison Horsley	
1129	Bethany Booth	Save the cricket club !!!
1130	Daniel Read	
1131	Matthew Midgley	
1132	Julie Crosby	
1133	Steven Parkinson	
1134	Richard Stockton	
1135	Julie Britton	
1136	Beth Birch	

1137	Sheila Marsh	Too valuable a cricketing hub with great facilities to the community and hundreds of players to be developed into housing . Rugby fields will still be at the end of a poor road system . No!
1138	Pernilla Tweddle	This Club is hugely important to everyone in the Heworth community especially young people. Make the right decision and keep this community asset- it is the best of its kind and so much more than just a cricket club - it is somewhere for young people to go, to socialise, to watch and take part in sports, to make friends, to be outdoors.
1139	Lesley Slater	
1140	Emma Hall	
1141	Ruth Lowe	
1142	Louise Fletcher	Louise Fletcher
1143	John Armitage	
1144	Elaine Brittain	
1145	Sally Glazier	
1146	Mary Curley	
1147	Lee Poulter	
1148	Patrick Toland	
1149	Amrit Premi	Amrit Premi
1150	Graham Parkinson	
1151	Mark Rozario	Hey. Please let the kids play. You never know where the next Flintoff or KP is going to come from.
1152	Susan Heywood	
1153	Jack Dawson	

[REDACTED]

From: Cllr. N. Ayre
Sent: 04 April 2018 19:28
To: localplan@york.gov.uk
Subject: Re:

Please note that the submission contains confidential personal information and should be redacted before being shared.

> On 4 Apr 2018, at 19:26, nigel ayre <[REDACTED]> wrote:

>

> Please see attached submission in response to the consultation on the Local Plan Publication Draft.

>

>

> <Cllr Ayre_Local Plan Consultation Response_04-04-18.pdf>

From: Stephen Courcier [REDACTED]
Sent: 04 April 2018 19:36
To: localplan@york.gov.uk
Cc: Andrew Mangham
Subject: Representations to the City of York Local Plan - Publication Draft
Attachments: City of York LP Reps FV - McCarthy and Stone Retirement Lifestyles Ltd.pdf; York LP Site Specific Reps V.2 - Land to the West of Common Road, Dunnington.pdf; Comments_form_FINAL.pdf

Dear Sirs,

Please find attached our representations on behalf of McCarthy and Stone Retirement Lifestyles Ltd to the consultation on the City of York Local Plan – Publication Draft (February 2018).

I would be grateful if you acknowledge receipt of the representations at a time of your convenience. Our client would welcome any discussions on any opportunities to bring forward the site as a housing allocation.

Kind regards,

Stephen

Stephen Courcier
Senior Planning Associate, The Planning Bureau
Aspen House Wykeham Road Northminster Business Park
Upper Poppleton York YO26 6QW
t: 01904 444216 | mob. [REDACTED] | e: stephen.courcier@theplanningbureau.ltd.uk

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City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Stephen
Last Name		Courcier
Organisation (where relevant)		The Planning Bureau Ltd
Representing (if applicable)		McCarthy and Stone Retirement Lifestyles Ltd
Address – line 1		Aspen House
Address – line 2		Wykeham Road
Address – line 3		Northminster Business Park
Address – line 4		Upper Poppleton
Address – line 5		York
Postcode		YO26 6QW
E-mail Address		Stephen.courcier@theplanningbureau.ltd.uk

Telephone Number		01904 444216
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Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

- Online via our website www.york.gov.uk/localplan.
- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

- City of York Local Plan Publication Draft
- Policies Map
- Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes No No comment at this stage

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

X **Positively prepared** **Justified** **No** X
Effective **Consistent with national policy** **No** X

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.

Please see reps

Policy Ref.

Please see reps

Site Ref.

Please see reps

5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

We confirm that we consider that the document fails the following tests of soundness:

Positively prepared

Justified

Effective

Consistent with national policy

Please see attached representations for further details

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Please see attached representations

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Our client wishes to participate at the oral part of the examination. The issues raised in our representations are important and worthy of further debate.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Representations must be received by Wednesday 4 April 2018, up until midnight.
Representations received after this time will not be considered duly made.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law. The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature **Stephen Courcier on behalf of the Planning Bureau Ltd**

Date **04/04/2018**

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012



4th April 2018

Local Plan Team
City of York Council
West Offices
Station Rise
York
YO1 6GA

Dear Sir/Madam,

**MCCARTHY & STONE RETIREMENT LIFESTYLES LTD.
RESPONSE TO CONSULTATION ON THE CITY OF YORK LOCAL PLAN – PUBLICATION
DRAFT FEBRUARY 2018 (REGULATION 19 CONSULTATION)**

INTRODUCTION

We write on behalf of our client McCarthy and Stone Retirement Lifestyles Ltd (MC&S). Firstly, our client would like to thank the Council for the opportunity to comment on the consultation papers for the aforementioned document. As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature it is well placed to provide informed comments on the Local Plan Publication consultation, insofar as it affects or relates to housing for the elderly.

MC&S would like to commend the Council's willingness to positively address the projected rise in the elderly population within the City of York and the serious issues this raises with regards to the future provision of adequate support and accommodation for elderly persons.

The purpose of these representations is to provide a commentary on several of the policies within the publication draft which are relevant to our client's interests. In addition, the representations will demonstrate that the emerging Local Plan should allocate our client's land to the 'west of Common Road, Dunnington' (Site Reference 9) for older persons' housing. These general representations on the 'soundness' of the Local Plan should be read in conjunction with our site-specific representations previously submitted to the Council (enclosed), which make additional comments on the suitability of our client's site for allocation.

Our client has a number of concerns in respect to the City of York Local Plan – Publication Draft, which principally relate to:

- The plan is not 'positively prepared' because it would not meet the city area's objectively assessed development requirements and fails to provide adequate allocations to meet the demand for specialist older persons' housing;



- The plan is not 'justified' because it is not based on the evidence base and is not the most appropriate strategy when considered against reasonable alternatives;
- The plan is not 'effective' due to lack of deliverability and flexibility; and
- The plan is not 'consistent with national policy' because it would not enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF).

It is our considered view that these concerns mean that the City of York Local Plan – Publication Draft cannot be considered sound within the meaning of Paragraph 182 of the NPPF.

To ensure that the City of York Local Plan is sound; the document should identify further housing sites, especially for older persons' housing, within the city area. Such a strategy would help ensure that the City's full housing needs are met over the plan period and provide a greater choice and competition in the market for land in accordance with the core principles of the NPPF.

The scale of additional land releases required is such that land is required to be excluded from the Green Belt to meet development requirements in the plan period. As part of these releases, our client's land to the west of Common Road, Dunnington should be identified for allocation within the Local Plan. It is clear that any adverse impacts of removing this land from the Green Belt and allocating it for development would not outweigh the benefits of meeting the development requirements of the city area, when assessed against the policies in the NPPF.

COMMENTARY ON SPECIFIC SECTIONS AND POLICIES IN THE PUBLICATION LOCAL PLAN

SECTION 1: BACKGROUND

Spatial Portrait- Paragraphs 1.24 to 1.68

Our client welcomes that the Local Plan acknowledges that:

- The number of people aged 65 and over has increased by more than other age categories in the city;
- The need for the Local plan to respond to the needs of York's population including specific groups, such as older persons housing and that provision reflects demographic change over the plan period for example the anticipated increase in the number of people over 70 years old living in York during the plan period.

Our client supports that the Council has sought to address these issues through the creation of a policy specifically dealing with Older Persons Specialist Housing (Policy H9). Such an approach is consistent with the Planning Practice Guidance (PPG), which specifically acknowledges that *"the need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households"*.



SECTION 2: VISION AND DEVELOPMENT PRINCIPLES

Vision and Objectives -Paragraphs 2.1 to 2.16

Our client welcomes that the Local Plan is seeking to meet the housing needs of the current and future population linked to the city's economic growth ambitions (paragraph 2.5). However, it is considered that the housing requirement of 867 dwellings per annum would not meet this objective and therefore the Local Plan is not positively prepared or justified in this respect.

We support the Local Plan's objective of promoting healthy lifestyles and improving the wellbeing of its residents (paragraph 2.6). Clearly the provision of specialist housing, particularly extra care housing, has a key role in promoting the health and well-being of older people and their carers. The recently published House of Commons CLG Committee 'Housing for Older People - Second Report of Session 2017–19 (5 February 2018) clearly recognises the link between housing provision and health. The document states:

"The right kind of housing can keep older people healthy, support them to live independently and in the longer-term reduce the need for home care or residential care and lead to savings in health and social care budgets".

As such, it is considered that the Local Plan should make clearer the explicit link between the provision of specialist older persons housing and maintaining the health and wellbeing of this acknowledged growing segment of the population.

Development Principles

Policy DP1: York Sub Area

Policy DP1 (York Sub Area) seeks to ensure that the approach taken in the Local Plan will reflect the role and function of the City Area within the Leeds City Region, the York and North Yorkshire Sub Region and the functional York Sub Area.

Criteria iii. states that one of the aims of the Local Plan is to ensure that that *"the housing needs of the City of York's current and future population including that arising from economic and institutional growth is met within the York local authority area"*.

Our client supports this aim, but fundamentally considers that the Local Plan as currently drafted would not meet the housing needs of the current and future population of the city area and therefore the document is unsound in this respect.



SECTION 3: SPATIAL STRATEGY

Policy SS1: Delivering Sustainable Growth for York

Policy SS1 seeks to enable the building of strong, sustainable communities through addressing the housing and community needs of York's current and future population. The policy sets out the housing requirement for the city area and the broad spatial principles guiding its distribution.

We consider that the Local Plan's housing target of 867 dwellings per annum is not positively prepared, justified, effective nor is it consistent with national planning policy. The housing target would not meet the City area's objectively assessed housing needs (OAHN) and does not accord with the tests set out in the NPPF. The evidence demonstrates that the Local Plan should provide a much higher housing requirement of between 953 to 1,070 dwellings per annum over the plan period.

Paragraph 14 of the NPPF is explicit that the Local Plan should meet its objectively assessed needs with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Paragraph 182 states that in order to be positively prepared, local plans should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. Paragraph 47 states that LPAs should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. Furthermore Paragraph 159 goes onto state that the housing provision should take account of the findings of the SHMA and it should meet the latest household and population projections. It is also the specific aim of the NPPF to significantly boost the supply of housing.

The Council is currently progressing with a housing target of 867 dwellings per annum. This figure is based on the demographic starting point from the ONS 2014- based sub-national household projections. The Council has decided to not include the 10% uplift to take account of market signals advocated within the GL Hearn SHMA.

The failure to include an appropriate uplift is clearly contrary to national guidance specifically paragraphs 17 and 158 in the NPPF as well as paragraphs 019 and 020 of the PPG. Paragraph 20 of the PPG makes clear that:

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices of rents rising faster than the national/local average may well indicate particular market undersupply relative to demand."

Paragraph 1.46 of the draft Local Plan states that median house and rental prices are significantly higher than the regional and national averages. The paragraph goes on to state that lower quartile house prices are 8.9 times higher than lower quartile earnings. Therefore, the evidence clearly indicates that an uplift should be applied to the baseline demographic figure. As a consequence of failing to apply the uplift, the Local Plan is not meeting the full objectively assessed need for the city area, as required by the NPPF and PPG.



The Housing White Paper 'Planning for the right homes in the right places' (September 2017) outlines a potential standard method for calculating local authorities' housing need. The standardised methodology has been taken forward in the draft changes to the NPPF. The methodology includes for an uplift for market signals over and above the demographic starting point figure. The White Paper identifies that using the standardised methodology would lead to the housing requirement for York being increased to 1,070 dwellings per annum.

It is evident that it is the intention of the Government to implement the new standardised approach to calculating housing need and therefore this should be a material consideration in the examination of the City of York Local Plan.

In summary, both the Council's SHMA and the Government's recently published White Paper indicate that the city area's OAN is significantly higher than the housing requirement of 864 dwellings per annum currently set out in Policy SS1. As a result, the proposed housing requirement is contrary to Paragraph 14 of the NPPF which states that Local Plans should meet the objectively assessed housing need, paragraph 47 that expects LPAs to significantly boost the supply of housing, in addition to Paragraph 50 which outlines that local planning authorities should plan for a mix of housing based on current and future demographic trends as well as the needs of different groups of people.

The evidence indicates that the OAN is somewhere in the region of 953 and 1070 dwellings per annum over the plan period. We consider that there are adequate opportunities within the city area to support this higher housing requirement. Equally, there is no agreement in place for neighbouring authorities to provide for part of the City of York's housing need.

As a result, in order for the Local Plan to be found 'sound', the housing requirement should be revised upwards to take into account of market signals and affordable housing need as advocated in paragraph 019 of the PPG. This will necessitate additional sites being brought forward for allocation for housing within the Local Plan. Therefore, we consider that the Council should review its available land supply in order to identify further sites that could accommodate both residential and specialist older persons accommodation.

SECTION 5: HOUSING

Policy H1: Housing Allocations

For the reasons set out in these representations, we consider that the Local Plan needs to bring forward additional sites to meet the City of York's Objectively Assessed Housing Need.

It is considered that our client's land to the 'west of Common Road, Dunnington' should be allocated for older persons housing to help meet the OAN within the city area. It is envisaged that the proposal would provide in the region of 30 apartments for open market sale and an additional 9 'affordable housing' retirement units i.e. equivalent to 30% provision.



The site is located within a sustainable location on the edge of Dunnington being within walking distance of a range of services and facilities as well as public transport options within the village. The proposed development would be well related to the existing built form and there are no constraints on the site that would impede the site's development for older persons' housing. The site is fully deliverable within the meaning of paragraph 47 of the NPPF.

In summary, we consider that the land to the west of Common Road, Dunnington should be allocated for older persons' housing within the emerging City of York Local Plan.

Policy H3: Balancing the Housing Market

Unless properly planned for, there is likely to be a serious shortfall in specialist accommodation for the older population in the area, which will have a knock-on effect in meeting the housing needs of the whole area and wider policy objectives. Specialist accommodation for the elderly, such as that provided by McCarthy and Stone, will therefore have a vital role in meeting the areas housing needs.

We would advocate that the Council continues in taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population within the Local Plan. We consider that the best approach towards meeting the diverse housing needs of older people is one that encourages both the delivery of specialist forms of accommodation such as sheltered / retirement housing and Extra Care accommodation.

Specialist accommodation for the elderly also usually provides an element of care and communal facilities at an additional cost to the developer. This requires a critical mass of residents in order to be feasible and small-scale developments of specialist housing for the elderly could not be realistically asked to provide or maintain such facilities. It is therefore unlikely to expect the provision of specialist accommodation for the elderly to be met piecemeal in general needs housing developments.

As a result, we consider that there is a need to allocate specific sites for older persons specialist housing.

Policy H9: Older Persons Specialist Housing

We would like to express our support, in general terms, for Policy H9 'Older People's Specialist Housing' which incorporates support for 'Developments specifically designed to meet the accommodation needs of older people'.

Nevertheless, it is important that Policy H9 should clarify the position in respect of Extra Care Housing. The current drafting of the supporting text to policy H9 at para 5.58 suggests that it is only Care and Residential homes that fall within Use Class C2. This is not the case.

Extra Care accommodation covers a very wide spectrum of care and support provision and it is well recognised that dependent on the care and support it provides and the facilities that come with it, can fall within either the C2 or C3 Use Class, which will determine in the majority of cases whether or not a Council will seek affordable housing contributions from the development. This is a complex issue



and there are a number of factors that determine whether or not an Extra Care development is within Use Class C3 or Use Class C2. However, a recent Appeal decision (APP/U1105/W/17/3177340, The Knowle, Station Road, Sidmouth, Devon, EX10 8HL dated 22nd January 2018) is very helpful in this regard in succinctly highlighting how the issue ought to be approached. Paragraph 37 states:

The RTPI Good Practice Note 8 and Housing LIN15 deal specifically with Extra Care Housing and offer some guidance on possible distinctions between C2 and C3 Extra Care accommodation. These principles can be applied to the appeal proposal. Key to the distinction is the extent to which communal services are provided and the extent to which care is available to meet the needs of residents.

In concluding that in that case, the proposal fell within Use Class C2, the Inspector concluded at Paragraphs 49 and 50:

For all of these reasons, it is clear to me that the development is offering much more than a dwelling house. Independent living accommodation is one element of the scheme but that would be provided alongside a range of communal facilities that are inextricably linked to an expected way of life. The scheme is designed to meet the needs of the target occupants and facilitate assisted living as well as social well-being and interaction with the outside world. Care would also be provided, specifically tailored to the needs of the occupant. Whilst some primary occupants of the development might, upon taking up residence, require only the minimum level of personal care there is likely to be a mix of care needs at any one time and those with limited need may well require additional care in the future.

I can see no justification for disaggregating different elements of the proposal or seeking to separate the individual apartments from the remainder of the scheme.

It is submitted that as the issue is very much one of Development Management and clearly that each scheme needs to be considered on its own circumstances and any policy, commentary or guidance must provide sufficient flexibility to allow for consideration of the specific circumstances of each scheme.

Extra Care accommodation, provides a valuable form of specialised accommodation, which meets a specific housing need. In so doing, it gives rise to significant planning and social benefits which realise other planning objectives that national and regional policy give priority to. It provides purpose-built, specifically designed accommodation in a safe and secure environment including companionship whilst allowing an independent lifestyle. Safety, security and companionship reduces anxieties and maintains health and general wellbeing. It also provides a form of housing which meets better the on-set and increasing problems of mobility/frailty while maintaining an independent lifestyle.

It is therefore considered that policy should be drafted which explicitly encourages Extra Care Housing and includes guidance along the following lines:

"All C3 Use Class homes will be required to provide affordable housing (including retirement properties but excluding Extra Care Accommodation where it falls within Use Class C2)"



CONCLUSION

We consider that the Council's approach within the City of York Local Plan – Publication Draft is not sound, given the failure to identify sufficient land to meet the City's objectively assessed housing needs and as a result its approach cannot be considered positively prepared, justified, effective or consistent with national policy.

In raising these fundamental concern in regards to the soundness of the City of York Local Plan – Publication Draft, we consider that these could be addressed in part by identifying our client's land to the west of Common Road, Dunnington as a housing allocation for older persons' housing.

We have demonstrated that our client's land to the west of Common Road, Dunnington (Site Reference 9) is fully deliverable and can come forward without significant detrimental impact on the character and appearance of village, flooding, the wider landscape, or any other notable interests.

I trust that the above comments will be considered in the evolution of any emerging consultation document and that we will continue to be invited to comment as the document progresses.

We can confirm that our client wishes to actively participate in the public examination of the City of York Local Plan and attend the relevant hearing sessions.

Yours faithfully

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City of York Draft Local Plan

Land to the West of Common Road, Dunnington



Representations on behalf of McCarthy & Stone Lifestyle Living Ltd

February 2018



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1

Introduction

These Local Plan representations have been prepared by The Planning Bureau Ltd, on behalf of McCarthy & Stone Lifestyle Living Ltd. Their purposes is to secure the allocation of the land to the west of Common Road for retirement housing and its removal from the Green Belt. The location of the site is shown in Plan 1.



Location of the New Site

The site has previously been considered by City of York Council under the reference 9 'Land at the corner of Common Road and Hassacarr Lane, Dunnington'. However at that time, a much larger parcel of land comprising of some 5.5 hectares of land was being promoted for general market housing (area shown blue on Plan 1). The original site (LPA reference No.9) was rejected because it fell predominately within Flood Zone 3a. However these representations are now promoting a much more smaller parcel of land exclusively for retirement housing (C3 Use Class) comprising of approximately 0.9 hectares, which falls entirely within Flood Zone 1. The remainder of the site would provide sports facilities and general amenity area for the local community. As a result, the new revised proposal would fully comply with flood risk and green belt policy in the National Planning Policy Framework (NPPF) (2012).

Our client considers that the land to the 'west of Common Road, Dunnington' (as shown in Plan 1) provides a unique opportunity to allocate land exclusively for older persons retirement housing and represents one of the most appropriate sites for allocation when considered against reasonable alternatives. However, it is also considered that in order to ensure that the emerging City of York Local Plan is justified and effective as well as delivers the spatial strategy; the document should identify further housing sites within the city area, especially for the specific purposes of older persons / retirement housing. Such a strategy would provide greater choice and competition in the market for land as well as help to address the 'critical' need for older people identified in the Council's Strategic Housing Market Assessment (SHMA) in accordance with paragraphs 17, 47 and 50 of the NPPF and paragraph 021 of the National Planning Practice Guidance (PPG) (2014) (Reference ID: 2a-021-20160401).



These representations will demonstrate that the land to the 'west of Common Road, Dunnington' is suitable for allocation for retirement housing and inclusion in the 0 -5 year supply, because;

- The site is fully deliverable within the meaning of paragraph 47 of the NPPF; and
- The allocation of the site for housing is justified because the proposed site represents one of the most appropriate site options when considered against reasonable alternatives; and
- The site is required to help meet the specific need for retirement housing within Dunnington and the City of York.

This representations are structured with the following format:

- Section 2 provides background to McCarthy and Stone;
- Section 3 sets out the nature and concept of retirement housing;
- Section 4 sets out the planning and social benefits of retirement housing for older people;
- Section 5 details the need for retirement housing in Dunnington and York;
- Section 6 provides a description of the site, and the surrounding area including the level of accessibility;
- Section 7 sets out details of the proposal;
- Section 8 sets out the underlying planning policy background;
- Section 9 sets out the case for the allocation of the site;

- Section 10 sets out the summary and conclusions.

For thoroughness, we have attached a completed representation form, which gives full details of the Client and the Planning Bureau Ltd.



Artist impression of the Proposed Scheme



McCarthy & Stone was established in 1963. During the past 40 years the Company has specialised in the design, construction and management of Retirement Living housing (also known as sheltered accommodation) for sale to older people, and has developed a wealth of experience in this particular sector of the housing market. Extensive research both at pre and post-occupation has been carried out by the Company, which has led to product and service development.

This background has resulted in McCarthy & Stone being widely recognised as the market leader in the provision of Retirement Living housing for sale to older people. To date more than 50,000 specialised dwellings for older people have been built or are in the course of construction at over 1,000 McCarthy & Stone development sites throughout the United Kingdom. As a result, McCarthy & Stone has considerable experience of successfully developing a wide variety of sites including town centre locations, infill sites, sites within conservation areas and those adjacent to Listed Buildings.

McCarthy and Stone's ethos is that later life can be more fulfilling. Through its developments and services, it helps older people enjoy their lives in peace, comfort and security. In addition to new developments, the Company provides its own care, support and management services. This ensures a continuing relationship and commitment to all of its residents.

McCarthy & Stone continues to win the highest awards possible for customer satisfaction. Independent surveys by the House Builders Federation (HBF) show that it is the only retirement house builder to achieve a double five star rating for customer service, and it has done so for twelve consecutive years.



3

Nature and Concept of Retirement Living Housing

Retirement Living housing is a proven option for older people who wish to move into accommodation that provides comfort, security and the ability to manage independently to a greater extent. It enables older people to remain living in the community and out of institutions whilst enjoying peace of mind and receiving the care and support that they need.

All McCarthy & Stone developments are specifically designed to provide specialised housing accommodation for older people, with communal facilities and specific features within the apartments tailored to meet the particular needs of older people. Since 2010 McCarthy and Stone has managed its own developments and a House Manager is based on-site, supported by the Company's management services team. This allows for the maintenance and management of the development and its grounds to be kept in line with best practice and all legal lease management requirements that apply.

While anyone may purchase an apartment, they are sold on the basis of a 999 year lease requiring the accommodation, with the exception of the House Manager's office accommodation, to be occupied by persons over 60 years. In the case of a couple, that part of the lease shall be satisfied where one of the occupants is over the age of 60 years and the other is over the age of 55 years.

This is a reasonable and caring approach to the limitation on the occupancy of retirement living housing in that it recognises and allows for those exceptional cases where a spouse, who is in need of special accommodation, has a younger partner.



Above: Example of a guest suite and an example of organised activities, which are a feature of a McCarthy and Stone development



Such occurrences are, in any event, found to be extremely rare as between 60-70% of occupants are aged 78 years or over with about 30% aged 80 years or above. The vast majority of McCarthy & Stone residents (some 85-90%) are widowed or single, with 75% of apartments comprising of single, female households.

The apartment accommodation includes a range of communal facilities that are also tailored to meet the needs of the residents, including:

- **residents' lounge;** this represents the heart of the community and is centrally located close to activity either on or off site (e.g. the car park). It is decorated to the highest standards and is designed to have the atmosphere of a high quality hotel lobby;
- **internal refuse room;** this allows residents to dispose of waste without leaving the building, and avoids the need for unsightly bin stores outside the property;
- **lift;** between floors facilitating ease of movement;
- **battery car store in the building;**
- **secure entrance lobby with CCTV link to individual apartments;**
- **emergency help line;** available within each residents' apartment and communal areas to summon assistance in the event of an emergency;
- **guest suite;** comprising an en-suite twin bedroom for family and friends to sleep over; and



- **gardens;** are an important element in the design of Retirement Living accommodation and will comprise well landscaped gardens, and with sitting out areas for the residents' enjoyment.



Above: Typical McCarthy and Stone apartments bedroom and lounge.

Recently a growing number of reports have been published that promote the strategic need to provide more and better housing for those in later life as well as the benefits that specialist accommodation for older persons delivers. These reports have been published by a variety of organisations including the private sector, academic institutions, charities and numerous Government bodies at national and local level.

4 Planning and Social Benefits of Retirement Living Housing for Older People

The following seven reports are of particular relevance and an executive summary for each is appended to this document:

- *Ready for Ageing?* compiled by the House of Lords Select Committee on Public Service and Demographic Change (Appendix A) - The report warns that the Government and our society are woefully under-prepared for ageing. The Committee says that longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boom could turn into a series of miserable crises. The report covers a broad range of policy areas, providing a comprehensive analysis of the potential impact of an ageing population on public services.

The report states that *“the housing market is delivering much less specialist housing for older people than is needed. Central and local government, housing associations and house builders need urgently to plan how to ensure that the housing needs of the older population are better addressed and to give as much priority to promoting an adequate market and social housing for older people as is given to housing for younger people”*.

Additionally, the report highlights that *“there are just 106,000 units of specialist housing for home ownership and 400,000 units for rent in the UK as a whole. Build rates are lower now than in the 1980s. In 2010, just 6,000 units for rent and 1,000 for ownership were built, whereas in 1989, 17,500 units for rent were built as well as 13,000 for ownership”*.

<http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>

- *Top of the Ladder* compiled by Demos (Appendix B) - This report uses original quantitative research to investigate older people’s housing preferences, and the likely impact of giving them greater choice. It estimates that if all those interested in buying retirement property were able to do so, 3.5 million older people would be able to move, freeing up 3.29 million properties. Apart from these gains, retirement housing has a very beneficial effect on older people’s health, wellbeing and social networks, and could save health and care services considerable resources.

<http://www.demos.co.uk/projects/topoftheladder>

- *Identifying the Health Gain from Retirement Housing* by the Institute of Public Care (Appendix C) - The paper highlights that increased companionship and security, better access to care and warmer, more accessible accommodation through the development of good quality retirement housing could reduce the need for health care expenditure.

<http://ipc.brookes.ac.uk/publications/index.php?absid=71>

- *Creating Housing Choices for an Ageing Population* by Shelter (Appendix D) - This report takes a detailed look at the current state of housing for the older people’s market and considers whether there is a wide choice of housing for an ageing population and if there is any scope to stimulate a greater supply.

http://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/policy_library_folder/a_better_fit_creating_housing_choices_for_an_ageing_population



- *Housing Markets and Independence in Old Age: Expanding the Opportunities* by Professor Michael Ball of Reading University (Appendix E) - This report highlights a number of simple policy changes needed to stimulate the delivery of owner occupied retirement housing.
<http://www.reading.ac.uk/news-and-events/releases/PR364822.aspx>
- *A Better Life: Private Sheltered Housing and Independent Living for Older People* by The Opinion Research Business (ORB) (Appendix F) - This sets out the findings of one of the largest studies of sheltered housing in the UK.
<http://www.mccarthyandstone.co.uk/documents/research%20and%20policy/orb2.pdf>
- *Local Area Economic Impact Assessment* by the Institute of Public Care (March 2014). This report (Appendix G) takes a detailed look at the economic benefits of sheltered housing developments on the local economy.
http://ipc.brookes.ac.uk/publications/pdf/Final_McCarthy_and_Stone_EIA_report_-_March_2014.pdf

These reports detail that Retirement Living housing provides a valuable form of specialised accommodation that meets a specific housing need. In so doing, it gives rise to significant planning and social benefits that realise other national and local planning objectives. Insofar as local and wider planning benefits are concerned, Retirement Living housing contributes the following:

Community

- Freeing up housing: Specialist housing helps to free up much-needed

and under-occupied family homes in the local area, thereby making better use of existing housing stock. An average scheme of 45 apartments frees up housing **worth nearly £7.5 million**.

- Community spending: McCarthy & Stone's developments contribute to the vitality and viability of the local area as its residents typically do their shopping within a one mile radius. 80% use local shops almost daily or often and over 40% use the local library or post office frequently. Residents occupying an average scheme of 45 apartments are estimated to have a 'community spend' of more than **£6 million** over a development lifetime period.

Economic benefits

- Investment during construction: An average development represents an investment of around **£3.6 million** into the local economy.
- Local jobs: Around 60 local companies are employed during construction, thus supporting local jobs. Additional job opportunities are created when the scheme opens.
- New Homes Bonus: Through this Government initiative to encourage new development, each local authority will receive around **£378,000** per every 45 new homes (McCarthy and Stone's typical development size) that are built in the local area. This is money it can spend as it deems fit.

Improved health

- Streamlined health and social care provision: Residents in specialist housing have fewer visits to local health professionals and find it easier to return home after stays in hospital.



- Older people account for 55% of GP appointments, 68% of outpatient appointments and 77% of inpatient bed stays. As well as achieving better outcomes, specialist housing reduces demand for these acute health and care services by supporting people to live independently and avoiding crisis intervention. Research shows that each year a resident postpones moving into public care by living in market accommodation, the local authority saves on average £30,000.
- Health and social care provision can be streamlined within specialist housing. Visiting health professionals including doctors, nurses, chiropractors and so forth can see several residents during one visit, which is a more efficient use of public resources.

Increased well-being

- Increased wellbeing: 64% of McCarthy & Stone's residents said their health and well-being had improved since moving into the scheme.
- A higher quality of life: 92% said they were very happy or contented.
- Increased independence: 83% believed they maintained their independence for longer.

Retirement Living housing provides purpose-built, specifically designed, small units of accommodation for local older people.

Insofar as local and wider planning benefits are concerned, Retirement Living housing:

- addresses an acknowledged and specific housing need;
- addresses an existing housing "mismatch", by releasing presently under

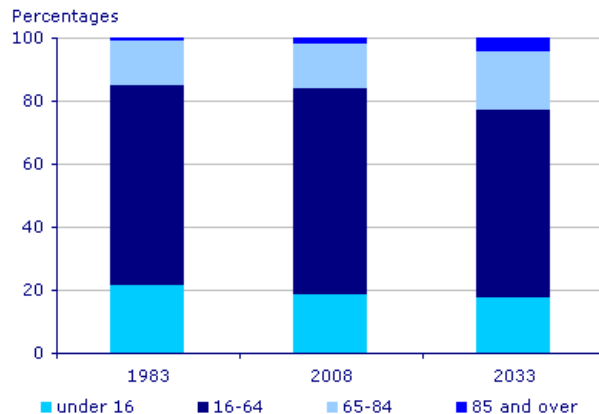
-occupied housing and thus plays an important role in the recycling of stock in general;

- has a knock-on effect in terms of the recycling of the whole housing chain – Retirement Living housing being at the "back-end" of the chain;
- optimises the use of residential development land ; and
- provides energy efficient construction and living, through shared wall construction, cross-flow ventilation and shared heating facilities.



The allocation of the site for Retirement Living apartments for older people provides a significant opportunity to contribute towards meeting the current and projected requirements for special needs accommodation for older people in Dunnington, the City of York and the UK generally. The following table and supporting text from 2014 based sub-national population projections, Office for National Statistics, shows the estimated increase in older people.

Ageing Fastest Increase in the 'oldest old'



Above: Population by age, UK, 1983, 2008 and 2033

“The population of the UK is ageing. Over the last 25 years the percentage of the population aged 65 and over increased from 15 per cent in 1983 to 16 per cent in 2008, an increase of 1.5 million people in this age group [in real terms]. Over the same period, the percentage of the population aged 16 and under decreased from 21 per cent to 19 per cent. This trend is projected to continue. By 2033, 23 per cent of the population will be aged 65 and over compared to 18 per cent aged 16 or younger.”

The fastest population increase has been in the number of those aged 85 and over, the 'oldest old'. In 1983, there were just over 600,000 people in the UK aged 85 and over. Since then the numbers have more than doubled reaching 1.3 million in 2008. By 2033 the number of people aged 85 and over is projected to more than double again to reach 3.2 million, and to account for 5 per cent of the total population” (Mid-year population estimates, Office for National Statistics).

Data from the 2011 Census shows that 949 people (29.4%) in Dunnington were of a pensionable age; out of this 455 people (14.1%) were aged 75 and over. This compares to the England/City of York area figures of 16.3% / 16.87% of the total population over 65 years old and 7.7 / 8.3% over 75 years old respectively.

The 2014—based Sub-National Population Projections, predicts that by the year 2028, 20.4% (46,000) of people in the City of York will be of retirement age, with 10.6% (34,000) of people over 75 years old. The population projections reveal that city area’s population of over 65 year olds is predicted to increase by 8,000 people and the over 75 year olds by 6,000 people within the next 10 years (2028).

As a result, both the Census data and population projections demonstrate that the proportion and number of older people within Dunnington and the wider city area will increase significantly over the plan period.

The York Strategic Housing Market Assessment (SHMA) (2016)

The SHMA acknowledges the changing age structure within the city area and states:

“The data shows that largest growth will be in people aged 60 and over: it is estimated that there will be 63,100 people aged 60 and over: it is estimated that there will be 63,100 people aged 60 and over in 2032 — this is an increase of



17,300 from 2012, representing growth of 38%. The population aged 75 and over is projected to increase by an even greater proportion, 59%, driven by improving life expectancy”.

Section 10 of the SHMA recognises that a key driver of change in the housing market over the next few years will be the growth in the population of older persons. It goes on to state that given the aging population and higher levels of disability and health problems amongst older people, there is likely to be an increased need for specialist housing options moving forward.

The SHMA identifies that the toolkit developed by Housing LIN, in association with the Elderly Accommodation Council and endorsed by the Department of Health, suggests that there should be around 170 units of specialist accommodation per thousand people aged over 75 years.

Based on this assessment, Table 64 identifies that there is a current shortfall of older persons sheltered accommodation within the city area of 82 units per 1,000 people, which is well below the recommended standards. Furthermore, paragraph 10.18 identifies that there is a potential need for 1,688 units during the plan period between 2012 and 2032, which is equivalent to 82 units a year.

In conclusion, the SHMA (2016) identifies that there is a substantial current and future need for specialist retirement housing in the city area. The market is clearly not currently delivering sufficient specialised retirement housing to meet the needs of older people. Equally it is evident that the need for this type of accommodation will increase exponentially over the plan period. This has significant impacts in terms of under-occupation of family housing within Dunnington and increased pressure on social and health care across the wider city.

York, North Yorkshire and East Riding Housing Strategy 2015– 21

Seeking to set out the diversity of needs to be found among the substantial population of older people across the sub-region the Strategy recognises the benefits to individuals and to the community of offering opportunities for older people to “down-size” their housing:

“The majority of these households will live independently and make informed housing and support choices. Many of them will be relatively healthy, wealthy and active and will wish to meet their needs and aspirations in the private market. A proportion of them however, will also live with a long term limiting illness and/or dementia. They may need or wish to move to more suitable/manageable accommodation as under occupation poses problems with heating and maintaining homes and also restricts family homes coming to the market. Modern, purpose built accommodation suitable for older people, particularly in the private market, would allow ‘downsizing’ and free up family accommodation which is in short supply. The high proportion of larger, detached properties in the area will not, for the most part, meet the needs of our older population.”

The development of Extra Care schemes is seen as a key element in devising an appropriate response to the needs of older people:

“Based on research across the sub region, such as North Yorkshire County Council’s Our Future Lives Policy and the Care and Support Where I Live Strategy, one of the responses we are making to the needs of older households is to develop Extra Care housing to provide for a wide range of housing, support and care needs in a number of locations. Extra Care housing offers high quality on site care and self-contained accommodation with a focus on community involvement and individual wellbeing.”



The Site and Surroundings

The site is located on the southern edge of the village of Dunnington, which forms part of York's 'Main Built-up Areas' as identified in the Key Diagram contained in the Pre-Publication Draft of the City of York Local Plan (September 2017).

The wider site is approximately 5.5 hectares in size and consists of relatively low quality agricultural land. However, our client is only seeking the allocation of approximately 0.9 hectares of the site for retirement housing. The remainder would be used for community sports provision and open space including the provision of a cricket pitch and small pavilion as well as parking. These facilities will be created by the developer and gifted to the local community. This part of the site would remain unallocated and within the Green Belt.

The site abuts to the north, the rear gardens of the houses bordering on to Greenside Close. To the east is Common Road, which provides a direct road frontage on to the site. Further to the east is Dunnington Sport Club and a range of outdoor sports facilities including tennis courts, bowling green and playing fields. To the west is open countryside. To the south is Hasscarr Lane as well as Hasscarr Nature Reserve and beyond which there is a small industrial / business park.

The site is located on the edge of an existing residential area, which is characterised by a mixture of two storey houses and dormer bungalows. The site itself is characterised by level topography and is largely devoid of any significant landscape features. There are no public rights of way on the site, but one runs close to the southern boundary.

The retirement housing scheme would represent a natural extension to the settlement, which would be consistent with the existing pattern of

development in the locality. The proposed landscape edge to the site would provide a strong defensible Green Belt boundary, which would have permanence beyond the plan period.

The City of York Draft Control Local Plan Incorporating the 4th Set of Changes (April 2005) identifies that the site is located within the Green Belt as well as outside of development limits and therefore within the open countryside for planning purposes. The site is not subject of any other planning constraints or environmental or ecological designations.

Accessibility

Dunnington is a large village with a good range of services and facilities to meet the residents' everyday needs. The Civil Parish has a population of approximately 3,230 people (2011 Census). There is an active community within the village centred on the Dunnington Reading Room, the primary school and the church. There is an active Parish Council and a variety of clubs and events including local sports teams, reading groups etc.

The village benefits from a range of services and facilities including (amongst other things):

- Ofsted Rated 'Good' Dunnington Church of England Primary School - approx. 830m from the site;
- Community Reading Room - approx. 700m;
- St Nicholas Church - approx. 640m
- Dunnington Library – approx. 390m;
- Dunnington Health Care Centre (Doctors Surgery) – approx. 320 m;
- Elvington Medical Practice (Dunnington Branch) - approx. 550m;
- Dunnington Dental Practice - approx. 550m;



- Pharmacy – approx. 400m;
- Costcutters (large food retail convenience store) – approx. 550m;
- Post Office – approx. 540 m;
- Butchers – approx. 520 m;
- Newsagents – approx. 400 m;
- Cross Keys Public House – approx. 220 metres ;
- Dunnington Sports club with bowling green, squash club, tennis courts and playfields —approx. 140 m.

All these facilities are within easy walking distance of the site on paved and lit footways. As a result, residents would be able to satisfy the majority of their day to day needs without recourse to a private car

York city centre itself is only approximately four and half miles to the west and provides further facilities akin to its status as a sub-regional city. Journey times by car are approximately 20 minutes to York City Centre. The same journey can be achieved in approximately 35 minutes using the local bus services from the bus stops located approx. 96 and 162 metres to the north of the site on Common Road. These bus services provide an half hourly service to the city centre of York including to the train station, thereby allowing multi-modal trips. In addition, the bus stops provide regular services to, amongst other places, Stamford Bridge, Gate Helmsley, Dunnington, Pocklington, Market Weighton, Driffield and Bridlington.

Locational Characteristics

In selecting sites for older persons' accommodation, McCarthy & Stone take full account of the locational criteria recommended in the Joint Advisory Note of the

National House Builders' Federation and the National Housing and Town Planning Council entitled - 'Sheltered Housing for Sale' (2nd Edition - 1988).

The five locational criteria identified are:-

- Topography
- Environment (including safety and security)
- Mobility
- Services
- Community Facilities

The NHBF/NHTPC Advisory Note acknowledges that the ideal site for sheltered housing is difficult to find. However, the site that is the subject of these representations is eminently suited to a use such as Retirement Living housing and is well situated to serve the needs of local elderly persons who will occupy such a development.



McCarthy and Stone is proposing to erect a three no. 2 storey blocks of retirement apartments on the site. It is envisaged that the large block would provide in the region of 30 apartments for open market sale. Whilst the two smaller blocks would provide 9 'affordable housing' retirement units i.e. equivalent to 30% provision.

The vehicle access would be achieved from Common Road via a new access bridge. Whilst a new footpath link would provide convenient pedestrian access on to Common Road. The proposed access could achieve the necessary visibility splays to ensure safe access and egress on to the highway.

In addition to the above, the remainder of the larger site would provide a range of sports facilities for the local community including a cricket pitch, small pavilion and car parking. These uses constitute 'appropriate development' in the Green Belt in accordance with paragraph 89 of the NPPF and are also appropriate from a flood risk perspective. It is important to note that we are not seeking the allocation and removal of this land from the Green Belt.

The site layout demonstrates that the proposed development can be satisfactorily accommodated on site within the area of lower flood risk area, together with the necessary site infrastructure including internal highways and pedestrian footways, appropriate landscaping and amenity space and car parking provision.



Above: Proposed Site Layout



National Planning Policy Framework

In March 2012 the National Planning Policy Framework (NPPF) was published, which sets out the Government's planning policies for England and how these are expected to be applied.

Sustainable Development and Decision Taking

At the heart of the National Planning Policy Framework (NPPF) is '**a presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking' (paragraph 14) [emphasis added]. In this respect it is also notable that paragraph 17, bullet point 3, states that planning should '*proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth*'.

Paragraph 7 of the NPPF stipulates that there are '*three dimensions to sustainable development: economic, social and environmental*'. The three components need to be pursued in an integrated way looking for solutions which deliver multiple goals. It is therefore clear that the NPPF wishes to see balanced decision making with all factors considered rather than decisions made in isolation of the three overriding principles.

In line with the three dimensions of sustainable development identified in the NPPF the proposed development performs the following important roles:

Economic: Ensuring the vitality of city, town and village centres is identified in the NPPF as one of the Core Planning Principles in delivering sustainable development.

The provision of retirement housing within close proximity to the centre of Dunnington will help enhance the vitality and viability of local shops and services. A report compiled by 'The Opinion Research Business' (ORB) entitled **A Better Life: Private Sheltered Housing and Independent Living for Older People** states how Retirement Living housing helps to underpin local shops, services and facilities. The report found that 62% of residents in Retirement Living schemes preferred to shop locally, with 45% of resident shopping within one mile of their scheme. The proposal will therefore help to improve the viability of businesses within the local centre and is therefore clearly economically sustainable.

The economic and community benefits provided by this form of housing are detailed in The Planning and Social Benefits of Retirement Living Housing (Chapter 4).

Social: The NPPF stipulates that the planning system should be '*supporting strong, vibrant and healthy communities*' by '*providing the supply of housing required to meet the needs of present and future generations*' (paragraph 7). Paragraph 50 of the NPPF highlights the need to '*deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community...such as...older people*'.

Older people are defined in Annex 2 - Glossary of the NPPF as "*people over retirement age, including the active, newly retired through to the very old frail elderly whose housing needs can encompass accessible, adaptable general needs housing for those looking to down size from family housing and the full range of retirement and specialised housing for the elderly*".

The NPPF also advises in Paragraph 159 that '*Local planning authorities should have a clear understanding of housing needs in their area*' and that policy should



'identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which meets household and population projections, taking account of migration and demographic change' and 'addresses the need for all types of housing, including...the needs of different groups in the community (such as...older people)'. Furthermore, the NPPF stipulates that local policy should cater for 'housing demand and the scale of housing supply necessary to meet this demand'.

A clear, priority need for private sheltered accommodation for the elderly has been established in 'The Need for Retirement Living Housing' chapter of this report (Chapter 5). The proposed development will assist the Council in meeting this housing need. Importantly however, the proposed development will enable older people to remain in their local environment and/or close to friends and family, allowing them to continue to play an important role in their local community. The proposed development is therefore considered to be inherently sustainable in social terms.

Environmental: The proposal is for a residential form of development that not only makes effective use of the land (paragraph 111 of NPPF) but also provides specialised accommodation for older people which meets a local need and addresses the changing demographic profile of Dunnington and the wider city area. It is therefore considered to be an environmentally sustainable development.

The NPPF is explicit that for plan making this means LPAs should plan positively to meet objectively assessed development needs unless the impacts of the development would significantly and demonstrably outweigh the benefits.

The NPPF goes on to state that Local Plans should be 'aspirational but realistic' and should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

In this respect, paragraph 47 of the NPPF confirms that the Government's key housing objective is to significantly boost the supply of housing. In order to significantly increase the housing supply an additional allowance of 20% should be included within the first five years land supply, where there is a persistent record of under delivery.

Paragraph 50 states that in order to deliver a wide choice of housing, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, LPA's should amongst other things plan for a mix of housing based on current and future demographic trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes.

Paragraph 159 of the NPPF states that 'Local Plans' should meet their full market and affordable housing requirement. It goes on to state that LPA's should prepare a Strategic Housing Market Assessment (SHMA) to identify the scale and mix of housing and the range of tenures that is likely to be required over the plan period which: meets household and population projections; addresses the need for all types of housing, including affordable housing; and caters for housing demand and the scale of housing supply necessary to meet this demand.

National Planning Practice Guidance

The National Planning Guidance (April 2016), contains a new emphasis upon the "critical" need to provide housing for older people. The section on housing need and methodology notes:

'The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household



Projections 2013). The age profile of the population can be drawn from Census data. Projection of population and households by age group should also be used. Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish. Supporting independent living can help to reduce the costs to health and social services, and providing more options for older people to move could also free up houses that are under occupied. The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered, enhanced sheltered, extra care and registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (Use Class C2). Many older people may not want or need specialise accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Local authorities should therefore identify particular types of general housing as part of their assessment'. [emphasis added].

This policy guidance clearly demonstrates the Government's latest position supports the urgent need to provide specialist housing for the ageing population.

The Planning Practice Guidance (PPG) is also clear that the assessment of land availability is an important step in the preparation of Local Plans. The PPG stresses the need for Local Planning Authorities to prepare land assessments for housing development in order to identify land to meet their objectively assessed needs. This assessment will principally involve assessing a site's suitability for development and the likelihood of the development coming forward.

The PPG states that the LPAs should seek to find out the following information from respondents as part of their land assessment:

- Site location;
- Suggested potential type of development;
- the scale of development
- Constraints on development.

Sites considered for allocation should be assessed against national policies and designations to establish which has reasonable potential for development. This will involve determining the suitability, availability and achievability of sites.

The Practice Guidance states that the suitability of sites for development should be guided by:

- The development plan, emerging planning policy and national policy,
- Market and industry requirements in that housing market or functional economic market area;

It goes on to state that when assessing the suitability of sites for development account should be taken of how up-to-date the plan policies are and consider the appropriateness of identified constraints on sites and whether such constraints can be overcome. In addition to these considerations, the following factors should be considered to assess suitability now and in the future:

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts including the effect upon landscapes including landscape



- environmental/amenity impacts experienced by would be occupiers and neighbouring areas.

In terms of availability, a site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell.

Finally, in regards to achievability, the guidance is clear that a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. It acknowledges that this is essentially a judgement about the economic viability, and the capacity of the developer to complete as well as let or sell the development over the certain period.

Summary

Both the NPPF and the PPG are clear that LPA's should meet their objectively assessed needs and where they have been unable to identify sufficient sites to do so, they should revisit their assessment of supply. They are also clear that LPA's should be looking to cater for all types of housing need within their administrative area with particular emphasis on meeting the critical need for housing for older people. As such, it is considered important that the Council looks to allocate sites for older persons wherever possible. The land to the west of Common Road, Dunnington provides a unique opportunity for the Council to allocate a site specifically for retirement housing.



McCarthy and Stone considers that the land to the west of Common Road, Dunnington should be allocated for specialised retirement housing and included within the 0 – 5 year housing land supply. The site is 'deliverable' within the meaning of the NPPF and therefore is suitable for inclusion in the first tranche of housing land releases. Paragraph 47 of the NPPF states that for a site to be deliverable it must be: -

- Available
- Suitable
- Achievable

AVAILABILITY

The site is available. McCarthy and Stone has an option agreement over the land. As a result, there is both a willing landowner and a willing and capable developer. There are no legal impediments, need for land in third party ownership, or known constraints that would impede delivery of the proposed development.

Our client is capable and willing to bring forward the site when required by the Council.

SUITABILITY

One of the fundamental considerations in determining whether a site is suitable for housing is the site suitability from a land use perspective. The principal considerations in this regard include –

I. Impact on the Character and Appearance of Dunnington

The site is located on the southern edge of Dunnington. The site directly borders on to the edge of the settlement to the north and therefore is well related to the existing pattern of development. As a result, the scheme would represent a modest extension to the existing built up area. The site itself clearly forms part of the suburban fringe and is considered to have limited visual amenity.



Artist Impression of the Proposed Scheme

It is recognised that the construction of the apartment block on the site would change the character of the site from being open to one with built development. However, the site is not of any special landscape merit and makes little contribution to the character of the surrounding area. As a result, we consider that the loss of the land would not have a detrimental impact on the visual amenity of the local area. However, the extent of any perceived impact would be limited by the proposed

layout and landscaping. The proposed layout seeks to retain the trees along the site frontage and boundaries as well as supplement them with new indigenous planting.

In summary, it is considered that the loss of this land would not have a detrimental impact on the visual amenity of the local area.

II. Green Belt

The starting point for any review of Green Belt is national Green Belt policy. The NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence. Therefore, it is important to assess areas of the Green Belt against its main purposes in national policy, to determine how it is currently contributing to these purposes and to support the identification of the most appropriate land to be used for development through the Local Plan. Accordingly, we have reviewed the 'land to the west of Common Road, Dunnington' against the five purposes of the Green Belt set out in paragraph 89 of the NPPF:

- ***To check the unrestricted sprawl of large built-up areas;***

The proposed residential site would only represent a modest incursion in to the Green Belt and would not lead to ribbon development or an isolated development site unconnected to the existing built up area. The proposed development would include structural landscaping planting along the site boundaries, which would provide a strong and defensible Green Belt boundary, which would have permanence beyond the plan period. As such, keeping the site open is not necessary to check the sprawl of large built-up areas.

- ***To prevent neighbouring towns merging into one another;***

The development of the site would not result in Dunnington merging with any other village or the City of York, and its defensible outer boundaries would ensure that the development is contained. Furthermore, the proposed development would preserve the strategic gap between Dunnington and the Dunnington Industrial Estate.

- ***to assist in safeguarding the countryside from encroachment;***

The proposal would not represent a significant encroachment in to the countryside. The site does not provide access to the countryside; it does not contain national or local nature designations or protected woodland, trees or hedgerows; and it does not contain buildings in agricultural use. As a result, keeping it open is not necessary to prevent encroachment.

- ***to preserve the setting and special character of historic towns;***

The site does not contribute to the setting or special character of York.

- ***to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.***

There are no derelict sites available within Dunnington which could accommodate the proposed development. Furthermore, the proposal would not undermine any of the regeneration initiative or strategic development sites within the City.

In summary, it is evident that the removal of the land to the west of Common Lane, Dunnington and its allocation for housing would not significantly harm any of the five purposes of the Green Belt set out in paragraph 80 of the NPPF.



III. Impact on local highways and access infrastructure.

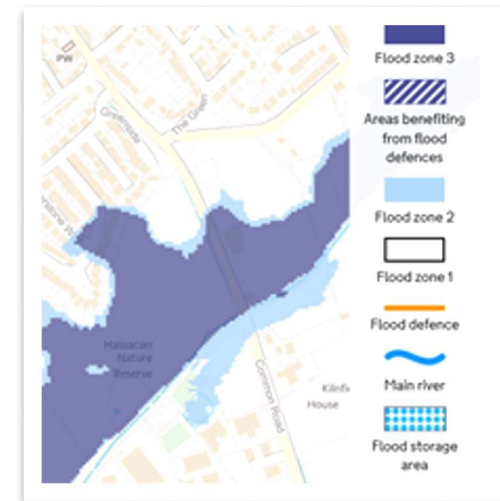
The proposed development meets local and national highway design standards. It is considered that an adoptable access can be achieved through the creation of a new priority T junction on to Common Road via a new access bridge. The proposed access can achieve the necessary visibility splays and the local highway network has sufficient capacity to serve the proposed development. Therefore, the site is deliverable in highways and transport terms.

IV. Sustainability Considerations

The site benefits from being within easy walking distance of a number of services and facilities within the village including a number of shops, two doctors surgeries, and dentist. It is also within walking distance of a number of bus stops on Common Road, which provide a regular service to York City Centre. For further details please see section 6.

V. Flood Risk Assessment

The Environment Agency maps identify that the site proposed for the retirement apartments is located within Flood Zone 1 and therefore has a low probability of flooding. As a result the site is suitable for retirement apartments from a flood risk perspective.



Extract from the Environment Agency's website

VI. Infrastructure Capacity

The site would benefit from the existing utilities serving the neighbouring properties i.e. gas, electricity, mains sewer, and water.

VII. Ground conditions constraints

Given that the site is agricultural grazing land, there is no reason to suggest that the site would be subject to any form of contamination and certainly none that would be prohibitive.



ACHIEVABILITY

Paragraph 47 of the NPPF states that for a site to be achievable there should be a reasonable prospect that housing will be delivered on the site within five years. As demonstrated, the site is fully achievable and there are no constraints that would impede its delivery.

McCarthy and Stone has entered in to an option agreement on the site which demonstrates that there is clear market demand for retirement housing development on the site. Equally, McCarthy and Stone has a strong track record of delivering high quality retirement housing scheme within the city, including recently at Bishophill and Stamford Bridge.

OVERALL CONCLUSIONS ON DELIVERABILITY

As demonstrated, the land to the west of Common Road, Dunnington is fully deliverable as it is available, suitable, and achievable within the meaning of Paragraph 47 of NPPF.



The site is ideally located for allocation for retirement housing. It is close to the amenities of Dunnington and would contribute towards an identified need for specialised older persons housing in the area and the wider city. The SHMA (2016) clearly identifies that there is a substantial current and future need for specialist retirement housing in the city area

The proposal will provide a high quality development with attractive landscaping that will make an effective use of this site in a manner that will help deliver the strategic objectives of the emerging Local Plan and National Policy. At the same time, retirement housing is generally a passive use, and an entirely sympathetic neighbour with extremely low levels of traffic generation in comparison to other potential housing uses of the site.

These representations have demonstrated that our client's site to the west of Common Road, Dunnington is fully deliverable and can come forward without significant detrimental impact on the wider landscape, heritage assets, or any other notable interests. It is also entirely appropriate from a flood risk perspective.

The NPPF and PPG are clear that LPA's should be looking to cater for all types of housing need within their administrative area, with particular emphasis on meeting the critical need for housing for older people. As such, it is considered important that the Council looks to allocate sites for older persons wherever possible. The land to the west of Common Road, Dunnington provides a unique opportunity for the Council to allocate a fully deliverable site specifically for retirement housing



From: jadu-www@rsvm121.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 04 April 2018 20:00
To: localplan@york.gov.uk
Subject: A new Local Plan Publication Draft response form has been submitted

A new Local Plan Publication Draft response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

Web ref: 105194

Date submitted: 04/04/2018

Time submitted: 20:00:19

Thank you for submitting your Local Plan Publication Draft response form (ref: 105194, on 04/04/2018 at 20:00:19) to City of York Council.

The following is a copy of the details you included.

About your comments

Whose views on the Local Plan publication draft do your comments represent? Own comments

About you/the organisation/individual/group you're representing

Please complete in full; in order for the Inspector to consider your representations names and postal addresses must be provided.

Title: Mr

Forename: Nigel

Surname: Thompson

Name of the organisation/individual/group you're representing:

Address (building name/number and street): [REDACTED]

Address (area): [REDACTED]

Address (town): [REDACTED]

Postcode: [REDACTED]

Email address: [REDACTED]

Telephone number: [REDACTED]

What are your comments about

You may complete this form more than once - you should **submit a separate form for each issue to you want to raise** relating to the Local Plan 'publication draft', the Policies Map or the Sustainability Appraisal/Strategic Environmental Assessment.

Which document do your comments relate to? Local Plan Publication Draft

Legal compliance of the document

'Legally compliant' means asking whether or not the plan has been prepared in line with statutory regulations, the duty to cooperate, and legal procedural requirements such as the Sustainability Appraisal. Details of how the plan has been prepared are set out in the Consultation Statements and Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan.

Do you consider the document is legally compliant? No, I do not consider the document to be legally compliant

Do you consider the document to comply with the Duty to Cooperate? NoCompliestoDuty

Please justify why you do/do not consider the document to be legally compliant or in compliance with the Duty to Cooperate:

I have no views on this, but that is not an option given, so I have ticked no. My comments on this document refer specifically to the proposed expansion of Northminster Business Park which I object to.

Whether the document is/is not 'sound'

Deciding whether you consider the document to be 'sound' means considering whether it's 'fit for purpose' and 'showing good judgement'. The inspector will use the public examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness':

- **positively prepared** - prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development
- **justified** –the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- **effective** – deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- **consistent with national policy** – enables the delivery of sustainable development in accordance with the policies in the framework

Do you consider the document to be 'sound'? No, I do not consider the document to be sound

Please indicate which of four 'tests of soundness' relate to your answer:

[Response - SoundnessYES] not justified,not consistent with national policy

Please give reasons for your answer(s):

I wish to object very strongly to policy proposal SS23 in this document, concerning the proposed large expansion of Northminster Business Park, on the following grounds.

1. It is directly at odds with the Upper and Nether Poppleton Neighbourhood Plans. These were approved on 23 August 2017 by 91.3% of voters, and expressly stated here should be no expansion of this site:

8.1 Currently there are three business parks within the designated area of Nether and Upper Poppleton and one small farm diversification business unit. They provide employment locally and have varying degrees of success in attracting business and clients. Much of the success has to do with ease of access to the sites, security of tenure and sufficient parking for employees and clients.

8.2 A good example is cited as Northminster Business Park where the site is screened by trees and blends with the rural environment. Clear notice boards indicate names and locations of businesses and there is a high level of satisfaction by all using these premises. The site is compact and has limited road access down a narrow lane. Expansion within the curtilage of this site would be acceptable. Further expansion would compromise the green belt.

Local voters and the Parish Council understand the implications of this. City Council planners have ignored this issue for long enough, and now need to address it. This site is not suitable for expansion beyond its existing boundary.

2. Loss of Residential Amenity. City Planners appear to forget that Northfield Lane is a residential road where 6 private residences adjoin the Business Park. The lane is already subject to a large number of heavy (12-wheeler) lorry, and other traffic, movements because of the existence of Northminster Park's entrance diagonally opposite our properties, and only c.25 metres from the nearest residence.

Noise increasingly affects our quality of life. This is not just from Northminster Business Park but also Oakwood Business Park, and the caravan storage park at the end of Northfield Lane.

Policy SS23 states:

“In addition to complying with the policies within this Local Plan, the site must be delivered in accordance with the following key principles....

vii. Ensure that the residential amenity of neighbouring residential properties is maintained.”

The only way to do this is to bar any increase, or better to reduce, the number of HGVs and delivery lorries on Northfield Lane. Parked cars make the lane even narrower, and it is only a matter of time before there is a serious accident.

- Lorries turn up at all hours of the day and increasingly at night (which we understand was barred in the original granting of planning permission) and have also parked in the lane overnight.

No expansion to this site should be considered at all, outside the current boundary. (It's only a matter of time before they would want to expand even further). What sort of local plan would seek to expand industry on a residential road? Please remember that people live here.

An alternative would be to permanently shut all access (except pedestrian/bicycle) from the business park onto Northfield Lane and divert traffic exclusively onto a new roundabout junction on the A1237, well away from housing, and NOT linked to Northfield Lane.

3. It conflicts with Green Belt Policy and harms the Green Belt.

The 2012 National Planning Policy Framework states: "89. As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."

Policy SS2 : The Role of York's Green Belt, states: "... New building in the Green Belt is inappropriate unless it is for one of the exceptions set out in policy GB1".

But Policy GB1 contains no such exception. The closest that can be identified is "limited infilling or redevelopment of existing developed sites".

However, policy proposal SS23 is not about limited infill, it is about a major, unjustified expansion. As such, it is inconsistent with the NPPF, contrary to SS2/GB1, and should therefore be removed. The long-term success of Green Belt policy in defending the urban fringe should not be jeopardised by pandering to the short term greed of some local landowners.

4. It conflicts with Policy GI3 and puts a far larger part of the Green Belt at risk.

The Green Belt is dependent on being continuous and linked via green corridors, yet a quick look at the map shows how fragile this is in 'Rural West York' – urban coalescence of development between Poppleton and Knapton has already gone as far as it can before it becomes continuous, and risks cutting off a large amount of greenbelt land (between Northfield Lane and the western boundary of York north of Wetherby Road) from open countryside. The fields north of Knapton village would become a peninsular of Green Belt with its habitat and diversity reduced.

Policy GI3: Green Infrastructure Network, recognises the above by stating "In order to protect and enhance York's green infrastructure networks any development should where relevant:

i. maintain and enhance the integrity and management of York's green infrastructure network, including its green corridors and open spaces."

Hence, expansion of Northminster Business Park (or Poppleton Park and Ride facility) closes this crucial green corridor even further. There should be a ban on all development along the Northfield Lane-Knapton Main Street, to avoid coalescence, and to avoid risking cutting off the wildlife that needs these corridors. In the last six weeks alone, deer, bats, hedgehogs, buzzards, foxes and tawny owls have all been seen to the east of Northfield Lane. If expansion of the business park is allowed, with its attendant noise and light pollution, they will be driven away.

5. Northfield Lane is completely unsuitable to support traffic for such a major expansion.

- The lane is a dead-end, which should stay that way as it saves local residents from even more traffic.

- But that also means that the junction with the A59 has become a very busy junction due to the Park and Ride. At any given time of day, not just in the peaks, only 3 or 4 vehicles (or one lorry)

can get out to turn right onto the A59 because of a combination of traffic and/or badly-sequenced traffic lights. It is only a matter of time before a lorry or a car towing a caravan inadvertently blocks the outbound A59 completely by being caught at this right-hand turn.

- No developments that add any further traffic onto Northfield Lane should be contemplated.
- Northfield Lane was not built to be wide enough for such heavy or large lorries and the road verges are subject to being churned up by their passage.

6. Amenity. Because it is a dead-end, Northfield Lane is used by many residents of West York for walking, cycling, horse riding etc. With the exception of crossing the A1237 and the above-mentioned traffic to/from the business park, it provides a relatively safe pedestrian route between West York/Knapton and Poppleton. To build on this end of Northfield Lane removes that amenity and the extra traffic generated, turning right into the business park, increases the danger.

7. No Requirement. As there appear to be empty business properties at many of the business parks sited at this side of the city, and similar premises in other areas of the city are being converted into flats and apartments or demolished, then clearly there are no “special circumstances” applying to Northminster Business Park, for the purposes of national Green Belt policy.

8. Loss of Grade 1 and 2 Agricultural Land.

The long-term success of Green Belt policy in defending agricultural land should not be jeopardised by pandering to the short term greed of some local landowners. Once it is gone, it is gone.

Which part of the document do your comments on 'soundness' relate to? Please provide a paragraph number, a policy reference or a site reference: See above.

Necessary changes

You can suggest any change(s) you consider necessary to make the Local Plan legally compliant or sound - you'll need to say why the modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Your suggestion should cover succinctly all the information, evidence and supporting information necessary to support/justify it. There will not normally be a subsequent opportunity to make further representations; these would only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

Remove all reference to Northminster Business Park expansion. It should not take place.

If you're seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination? No hearing sessions

If you select 'No', your suggestions will still be considered by the independent planning inspector by way of written representations.

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt, to hear those who want to participate at the hearing sessions.

From: Dr Roger Pierce [REDACTED]
Sent: 04 April 2018 20:05
To: localplan@york.gov.uk
Cc: [REDACTED]
Subject: City of York Local Plan Publication Draft

Importance: High

Earlier today, I downloaded the standard form provided on your website to make objections to the local plan. Whilst I successfully downloaded and saved it as a Word file, I was unable to enter any comments in the spaces provided beyond my name and contact details, viz:

Dr Roger Pierce
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

Whilst I accept that the plan complies with legal requirements, I object to Policy SS1 on the grounds that the minimum annual provision of 867 new dwellings has not been objectively assessed and this therefore unsound.

The justification for this objection is:

GL Hearn submitted a *Strategic Housing Assessment Update* in May 2017. This reported increased in latest household projections which raised the annual housing need to 867 per annum which was '*the relevant baseline figure*' for 2032/33. They also reported the 'market signals evidence'. The latest data showed that the ratio of lower quartile house prices to lower quartile earnings was 8.9 (2015). Hearn noted that the council had an affordable housing policy of up to 30% which would translate into a requirement for 573 affordable houses out of a revised target of 1,910 which they regarded as unattainable. They concluded that: '*Given the balance of judgement it would appear that a 10% adjustment [to 953 per annum] could be justified in York on the basis of the previously established affordable housing need the updated market signals evidence*' (para 3.8). The update was considered by the council's executive on 13 July 2017 who resolved that: '*the recommendation of GL Hearn in the draft Strategic Housing Market Assessment to apply a further 10% figure for market signals (to 953 dwellings per annum) 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 to little or no weight to the special character and setting of York and other environmental considerations*'.

On 23 January 2018, the council's Local Plan Working Group considered the report by its officers who described the new national policy context provided by the DCLG White Paper '*Planning for Right Houses in the Right Places*'. This introduced a new methodology for assessing housing need to be incorporated in the consultation draft a new NPPF in March 2018. The officers wrote that: '*The DCLG November 2017 consultation included a proposed methodology for calculating housing need. This is based on three principles: simplicity, using publicly available data and producing realistic targets. The document applies this methodology to City of York and indicated a minimum of 1,070 dwellings p/a for the period 2016 to 2026^[1] (agenda item 3, para 10).*

Officers further advised that: '*26. Members must be satisfied that they consider the Submission Draft Plan meets the test of "soundness". This is a statutory duty. Officers' advice is that the direction of travel in national policy indicates that, if the site proposals previously consulted on were increased, this would be a more robust position*'.

The officers' advice was not accepted.

The council gave no substantive reason for rejecting its own officers' advice and for continuing with a target of 867 which its advisers, GL Hearn recommended should be raised by 10% to 953 to reflect market conditions.

The housing target of 867 has therefore not been objectively assessed by the decision-makers and the policy SS1 is unsound.

The change I wish to see is to increase the annual target to the figure of 1,070 recommended by planning officers.

(signed)

Dr Roger Pierce (Retired Architect and Town Planner)

^[1] An uplift of 23.4%

From: jadu-www@rsvm120.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 04 April 2018 20:07
To: localplan@york.gov.uk
Subject: A new Local Plan Publication Draft response form has been submitted

A new Local Plan Publication Draft response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

Web ref: 105195

Date submitted: 04/04/2018

Time submitted: 20:07:21

Thank you for submitting your Local Plan Publication Draft response form (ref: 105195, on 04/04/2018 at 20:07:21) to City of York Council.

The following is a copy of the details you included.

About your comments

Whose views on the Local Plan publication draft do your comments represent? Own comments

About you/the organisation/individual/group you're representing

Please complete in full; in order for the Inspector to consider your representations names and postal addresses must be provided.

Title:

Forename: Naomi

Surname: Smith

Name of the organisation/individual/group you're representing:

Address (building name/number and street): ■

Address (area): ■

Address (town): ■

Postcode: ■

Email address: ■

Telephone number: ■

What are your comments about

You may complete this form more than once - you should **submit a separate form for each issue to you want to raise** relating to the Local Plan 'publication draft', the Policies Map or the Sustainability Appraisal/Strategic Environmental Assessment.

Which document do your comments relate to? Sustainability Appraisal/Strategic Environmental Assessment

Legal compliance of the document

'Legally compliant' means asking whether or not the plan has been prepared in line with statutory regulations, the duty to cooperate, and legal procedural requirements such as the Sustainability Appraisal. Details of how the plan has been prepared are set out in the Consultation Statements and Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan.

Do you consider the document is legally compliant? No, I do not consider the document to be legally compliant

Do you consider the document to comply with the Duty to Cooperate? NoCompliestoDuty

Please justify why you do/do not consider the document to be legally compliant or in compliance with the Duty to Cooperate:

Local Plans are supposed to be in favour of sustainable development. The new development at Germany Beck is already causing significant static traffic along the A19 already, prior to the 700 new homes being built on the site. This cannot be sustainable with the inevitable increase of cars in the area. The increase in static traffic will undoubtedly cause further pollution in one of the worst roads in the UK.

The raised junction, designed to prevent flooding to the local residents is already flooding and causing issues along the busy A19. Who will be held responsible for 'new' flooding to properties which have never flooded? The damage and change to the natural surface run off, drainage channels and increased level of tarmac are not a sustainable way to prevent flooding.

Where are the new children from the Germany Beck site going to go to school? No new school was built and yet people have children.

OS7 needs to be firmly allocated to the Fulford Parish Council before the local developer builds on the proposed additional parish space. Currently important as the local open space is being built on and destroyed by the buildings proposed.

Whether the document is/is not 'sound'

Deciding whether you consider the document to be 'sound' means considering whether it's 'fit for purpose' and 'showing good judgement'. The inspector will use the public examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness':

- **positively prepared** - prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development
- **justified** –the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- **effective** – deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- **consistent with national policy** – enables the delivery of sustainable development in accordance with the policies in the framework

Do you consider the document to be 'sound'? No, I do not consider the document to be sound

Please indicate which of four 'tests of soundness' relate to your answer:

[Response - SoundnessYES] not positively prepared,not justified,not effective

Please give reasons for your answer(s):

The document is not positively prepared, justified or effective because glaring errors, causing massive issues in Fulford are being over looked constantly by the City of York Council and Permission. Planning applications are constantly changing to suit the building company and lack of local consultation is continuous. Tress and open spaces are being destroyed and aren't in compliance with the agreed planning applications. The promises of flood free areas and reduced traffic are already, clearly lies. Neither will discuss the issues with the local people.

Which part of the document do your comments on 'soundness' relate to? Please provide a paragraph number, a policy reference or a site reference: a

Necessary changes

You can suggest any change(s) you consider necessary to make the Local Plan legally compliant or sound - you'll need to say why the modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Your suggestion should cover succinctly all the information, evidence and supporting information necessary to support/justify it. There will not normally be a subsequent opportunity to make further

representations; these would only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

If you're seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination? No hearing sessions

If you select 'No', your suggestions will still be considered by the independent planning inspector by way of written representations.

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt, to hear those who want to participate at the hearing sessions.

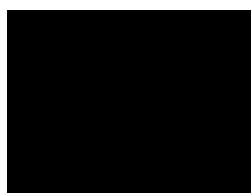
[REDACTED]

From: York CAMRA Pub Protection Officer [pubprotection@yorkcamra.org.uk]
Sent: 04 April 2018 20:13
To: localplan@york.gov.uk
Subject: Local Plan Consultation Response
Attachments: Local Plan Comments_form_FINAL York CAMRA.docx

Importance: High

Please find enclosed a completed Local Plan Comments form on behalf of York CAMRA. Could you please acknowledge receipt.

Best Regards



NICK LOVE
PUB PROTECTION OFFICER
YORK CAMRA



York
Campaign for Real Ale

City of York Local Plan Publication Draft 2018 Consultation response form 21 February – 4 April 2018

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information


To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has produced this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Nick	
Last Name	Love	
Organisation (where relevant)	York CAMRA	
Representing (if applicable)		
Address – line 1		
Address – line 2		
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		
E-mail Address		
Telephone Number		

Guidance note

Where do I send my completed form?

Please return the completed form **by Wednesday 4 April 2018, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical papers. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as you go through the response form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

- Online via our website www.york.gov.uk/localplan.
- City of York Council West Offices
- In all libraries in York.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which document does your response relate? (Please tick one)

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. (1) Do you consider the document is Legally compliant?

Yes No

4.(2) Do you consider that the document complies with the Duty to Cooperate?

Yes No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Not applicable given we answered "Yes"

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below. The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5.(1) Do you consider the document is Sound?

Yes No

If yes, go to question 5.(4). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)

Positively prepared Justified
 Effective Consistent with national policy

5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?

(Complete any that apply)

Paragraph no.	6.5 & 6.10	Policy Ref.	HW1	Site Ref.	
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

You can attach additional information but please make sure it is securely attached and clearly referenced to this question.

Regarding pub protection policy this Local Plan is not “justified” in that it is not the most appropriate strategy to cope with current and future threats to York’s pubs. It is also not consistent with the documented wishes of the City of York Council Executive who passed a resolution on Thursday 29th October 2015 regarding Pubs and the Local Plan:

13. Protecting Public Houses Resolved:

That having considered the options, recommendation of the Local Plan Working Group and the various representations Executive agree for:

(vi) Continuing work with interested parties including York CAMRA and pub landlords in the formulation of pub friendly planning law within the Local Plan to ensure as and when there are planning applications the Local Plan is robust enough to stop inappropriate development that would be detrimental to a particular pub and associated community.

York CAMRA submitted a document in response to the first consultation, based on best practice nationally, which was ignored in its entirety.

Pubs are in need of more robust protection particularly in respect of issues of “viability” where owners claim a lack of viability, often fallaciously, as justification for closure and change of use or demolition. The wording in paragraph 6.10 around viability is not robust or comprehensive enough to offer sufficient protection to any community facilities and in particular public houses.

We also believe the Local Plan is not consistent with the NPPF in that it doesn’t name public houses as Community Facilities in paragraph 6.5 - whereas the NPPF specifically does. Again this is curious given a long history of documented support by both the Council Executive and specific councillors when pub matters are discussed in council meetings.

6. (1) Please set out what change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further representations will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Paragraph 6.5 on page 122

We would suggest the definition in NPPF paragraph 70 be used instead of the current wording in point 6.5 on page 122: *Community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship)* or if the existing wording has been specifically chosen to replace the NPPF wording then *public houses* should be added to the list of definitions.

Paragraph 6.10 on page 123

We believe that the wording in paragraph 6.10 is not robust enough in defining viability and making owners of community facilities under threat demonstrate lack of viability. Other adopted Local Plans in the UK are much more comprehensive in this respect – e.g. East Hampshire District & Kensington & Chelsea.

We would recommend the following wording to be added to 6.10 – not only to specifically protect pubs but for any community facility. We would remove the last sentence of 6.10 and then add the following:

In assessing proposals for the loss of community facilities, where appropriate the Council will request the following:

- 1. Clear evidence that the existing or recent community facility is not financially viable, such as accounts for the last three years in which it was in operation.*
- 2. In the case of public houses specifically - the [CAMRA Public House Viability Test](#) or a similar objective evaluation method, is (or has been) undertaken to assess the viability of the business and the outcomes show that the public house is no longer economically viable. The reasonable costs of any independent viability assessment will be expected to be met by the applicant.*
- 3. Documentary evidence (including digitized content) demonstrating that a range of measures have been explored to increase trade, diversity of use and the range of facilities offered.*
- 4. Evidence that there has been no interest in (where appropriate) purchasing either the freehold or leasehold of a community facility. The business must have been offered for sale locally, and in the region, in appropriate publications and through relevant specialised agents.*
- 5. Evidence that the community facility has been rigorously marketed, including evidence to show that it has been marketed both locally and regionally, at a reasonable price and for a period of 12 months. If this has not been done then this must be undertaken at a price agreed with the Council following an independent professional valuation (paid for by the owner of the community facility).*

7.(1). If your representation is seeking a change at question 6.(1), do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)



No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 1998 (and any successor legislation) to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law. The Council must also notify those on the database at certain stages of plan preparation under the Regulations.²

Retention of Information

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Your rights

To find out about your rights under the Data Protection Act 1998 (and any successor legislation), you can go to the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on [01904 554145](tel:01904554145)

Signature

Date

4th April 2018

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

From: jadu-www@rsvm121.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 04 April 2018 20:42
To: localplan@york.gov.uk
Subject: A new Local Plan Publication Draft response form has been submitted

A new Local Plan Publication Draft response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

Web ref: 105200

Date submitted: 04/04/2018

Time submitted: 20:41:32

Thank you for submitting your Local Plan Publication Draft response form (ref: 105200, on 04/04/2018 at 20:41:32) to City of York Council.

The following is a copy of the details you included.

About your comments

Whose views on the Local Plan publication draft do your comments represent? Own comments

About you/the organisation/individual/group you're representing

Please complete in full; in order for the Inspector to consider your representations names and postal addresses must be provided.

Title: Mr

Forename: Anthony (Tony) Hainsworth

Surname: Fisher

Name of the organisation/individual/group you're representing:

Address (building name/number and street): [REDACTED]

Address (area): [REDACTED]

Address (town): [REDACTED]

Postcode: [REDACTED]

Email address: [REDACTED]

Telephone number: [REDACTED]

What are your comments about

You may complete this form more than once - you should **submit a separate form for each issue to you want to raise** relating to the Local Plan 'publication draft', the Policies Map or the Sustainability Appraisal/Strategic Environmental Assessment.

Which document do your comments relate to? Local Plan Publication Draft

Legal compliance of the document

'Legally compliant' means asking whether or not the plan has been prepared in line with statutory regulations, the duty to cooperate, and legal procedural requirements such as the Sustainability Appraisal. Details of how the plan has been prepared are set out in the Consultation Statements and Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan.

Do you consider the document is legally compliant? Yes, I consider the document to be legally compliant

Do you consider the document to comply with the Duty to Cooperate? YesCompliestoDuty

Please justify why you do/do not consider the document to be legally compliant or in compliance with the Duty to Cooperate:

Local residents, local parish councils and other interest groups, as well as neighbouring local authorities, have all been fully consulted and their views fully taken into account, as required by law.

Whether the document is/is not 'sound'

Deciding whether you consider the document to be 'sound' means considering whether it's 'fit for purpose' and 'showing good judgement'. The inspector will use the public examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness':

- **positively prepared** - prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development
- **justified** –the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- **effective** – deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- **consistent with national policy** – enables the delivery of sustainable development in accordance with the policies in the framework

Do you consider the document to be 'sound'? Yes, I consider the document to be sound

Please indicate which of four 'tests of soundness' relate to your answer:

[Response - SoundnessYES]

Please give reasons for your answer(s):

The plan is sound and its housing need figure of 867 dwellings per annum is based on the real needs of the city. The housing need figure of 1070 dwellings per annum produced by the Ministry of Housing, Communities and Local Government is severely flawed, being based on data collected before the pre-2016 Brexit vote, and hence it drastically overestimates inward migration. This would result in an extra 4000 new dwellings, leading to an oversupply in the market. York is a very special place: it has a Green Belt, is extremely historic, which limits its infrastructure, and it floods severely on both its major rivers. Development on the scale suggested by the Ministry would erode the Green Belt unacceptably, put excessive strain on the infrastructure, eroding the quality of life for existing residents, and increased surface water run off caused by 4000 extra new dwellings would exacerbate flooding. Moreover, many people in the surrounding villages bought their properties to live in a village environment. Many residents (including myself), when faced with their village being absorbed into the urban sprawl by the expansion of the city, would choose to relocate to villages beyond York, leaving an unexpected source of housing. I urge the Inspector to endorse the Local Plan's figure of 867 dwelling per annum. This, combined with the large number of approved but unbuilt planning permissions, will adequately cater for York's housing demand until 2037. I urge the Inspector not to be misled by the amateurish analysis produced by the MHCLG, into which there should be an investigation to establish how such a flawed, out-of-date figure could ever have been allowed to be published.

Which part of the document do your comments on 'soundness' relate to? Please provide a paragraph number, a policy reference or a site reference: All of it, since housing need is at the core of the entire document

Necessary changes

You can suggest any change(s) you consider necessary to make the Local Plan legally compliant or sound - you'll need to say why the modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Your suggestion should cover succinctly all the information, evidence and supporting information necessary to support/justify it. There will not normally be a subsequent opportunity to make further

representations; these would only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

None. It's fine as it is.

If you're seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination? Yes hearing sessions

If you select 'No', your suggestions will still be considered by the independent planning inspector by way of written representations.

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:

I would appear in order to refute the Ministry of Housing, Communities and Local Government's severely flawed housing need assessment, should the Inspector give any weight to their figures and suggest any increase in the housing figures. If the Inspector accepts the Local Plan's housing need figure, this will not be necessary.

The Inspector will determine the most appropriate procedure to adopt, to hear those who want to participate at the hearing sessions.

From: jadu-www@rsvm121.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 04 April 2018 20:58
To: localplan@york.gov.uk
Subject: A new Local Plan Publication Draft response form has been submitted

A new Local Plan Publication Draft response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

Web ref: 105201

Date submitted: 04/04/2018

Time submitted: 20:58:08

Thank you for submitting your Local Plan Publication Draft response form (ref: 105201, on 04/04/2018 at 20:58:08) to City of York Council.

The following is a copy of the details you included.

About your comments

Whose views on the Local Plan publication draft do your comments represent? Own comments

About you/the organisation/individual/group you're representing

Please complete in full; in order for the Inspector to consider your representations names and postal addresses must be provided.

Title: Mrs

Forename: Claire

Surname: Broadbent

Name of the organisation/individual/group you're representing:

Address (building name/number and street): [REDACTED]

Address (area): [REDACTED]

Address (town): [REDACTED]

Postcode: [REDACTED]

Email address: [REDACTED]

Telephone number: [REDACTED]

What are your comments about

You may complete this form more than once - you should **submit a separate form for each issue to you want to raise** relating to the Local Plan 'publication draft', the Policies Map or the Sustainability Appraisal/Strategic Environmental Assessment.

Which document do your comments relate to? Local Plan Publication Draft

Legal compliance of the document

'Legally compliant' means asking whether or not the plan has been prepared in line with statutory regulations, the duty to cooperate, and legal procedural requirements such as the Sustainability Appraisal. Details of how the plan has been prepared are set out in the Consultation Statements and Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan.

Do you consider the document is legally compliant? No, I do not consider the document to be legally compliant

Do you consider the document to comply with the Duty to Cooperate? NoCompliestoDuty

Please justify why you do/do not consider the document to be legally compliant or in compliance with the Duty to Cooperate:

ST15 has been labelled as a brownfield site. It isn't as much of the housing will be in greenfield and the infrastructure required is going to take out huge areas of greenfield land.

Whether the document is/is not 'sound'

Deciding whether you consider the document to be 'sound' means considering whether it's 'fit for purpose' and 'showing good judgement'. The inspector will use the public examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness':

- **positively prepared** - prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from

neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development

- **justified** –the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- **effective** – deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- **consistent with national policy** – enables the delivery of sustainable development in accordance with the policies in the framework

Do you consider the document to be 'sound'? No, I do not consider the document to be sound

Please indicate which of four 'tests of soundness' relate to your answer:

[Response - SoundnessYES] not justified,not effective,not consistent with national policy

Please give reasons for your answer(s):

ST15 is a remote site with no existing infrastructure. It is close to a SINC site and SSSI. The proposal to put the largest housing allocation in the plan here is not consistent with national policy in greenfield development.

The proposal to have OS10 as a nature conservation area has not been thought out. The existing managed agricultural land surrounding the SSSI Tilmire site supports the wildlife population and retaining high grade agricultural land would be a much sounder option.

The plan only shows an indicative road access but SS13 point xiii states the lane will become a pedestrian and cycle route. This road is bendy and narrow and with existing resident and farm traffic is unsafe - hence unsound. Also pedestrian will have easy access to the conservation land and SSSI site if routed this way with their dogs. This is very detrimental. The pedestrian and cycle route should be routed well to the east of the current lane to avoid this.

Retaining dedicated free access for residents of the lane is vital. No thought has been given as to how free access would be retained under the plan. SS13 point xv.

Which part of the document do your comments on 'soundness' relate to? Please provide a paragraph number, a policy reference or a site reference: SS13 and ST15 os10

Necessary changes

You can suggest any change(s) you consider necessary to make the Local Plan legally compliant or sound - you'll need to say why the modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text.

Your suggestion should cover succinctly all the information, evidence and supporting information necessary to support/justify it. There will not normally be a subsequent opportunity to make further representations; these would only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

The access for pedestrians and cycle route should be alongside the indicative red road shown on the plan. It should be well over to the east of Langwith / long lane.

Any pedestrian or cycle access should be blocked from Langwith / long lane with a wooden and hedged barrier to discourage dog walkers coming into the conservation area OS10 and SSSI site.

The council should assess how much land in ST15 is brownfield and exactly how much greenfield land will be taken up. This information should be in the public domain.

The proposal for secure access for residents of Langwith / long lane should be removed from the plan. If the pedestrian / cycle route moves to the east and a natural barrier is put in between the corner at Langwith Stray and the development then free access could be retained for existing residents. Residents have a right to keep free access.

If you're seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination? No hearing sessions

If you select 'No', your suggestions will still be considered by the independent planning inspector by way of written representations.

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt, to hear those who want to participate at the hearing sessions.
