

From: Paul Butler [paul.butler@pbplanning.co.uk]
Sent: 04 April 2018 16:03
To: localplan@york.gov.uk; Sheldon, Kennedy
Subject: RE: CITY OF YORK LOCAL PLAN – LAND WEST OF WIGGINTON ROAD – BARRATT HOMES & DAVID WILSON HOMES AND TW FIELDS – CLIFTON GATE - SUPPORT FOR SITE REFERENCE ST14

Categories: Purple Category, Site submission

Good afternoon,

The documents that I would be submitting via the file share link are as follows. These have been submitted before and are follows:

- Visual Document – JTP/Turkington – August 2016
- Illustrative Masterplan – JTP – August 2016
- 1,350 Home Land Use Plan; Land Use Schedule & Key – JTP – August 2016
- 1,725 Home Land Use Plan; Land Use Schedule & Key – JTP – August 2016
- 2,200 Home Land Use Plan; Land Use Schedule & Key – JTP – October 2017
- Archaeology Statement - York Archaeological Trust – August 2016
- Outline Transport Strategy Report – Fore Consulting – September 2016
- Ecology Statement – Baker Consulting – September 2016
- Utilities Statement – Arup – September 2016

I will send these through now.

Kind regards,

Paul

Paul Butler
Director



www.pbplanning.co.uk

paul.butler@pbplanning.co.uk

07970 506702
01904 731365

PO Box 827, York, YO31 6EE

From: localplan@york.gov.uk <localplan@york.gov.uk>
Sent: 04 April 2018 15:10
To: Paul Butler <paul.butler@pbplanning.co.uk>
Cc: localplan@york.gov.uk
Subject: RE: CITY OF YORK LOCAL PLAN – LAND WEST OF WIGGINTON ROAD – BARRATT HOMES & DAVID WILSON HOMES AND TW FIELDS – CLIFTON GATE - SUPPORT FOR SITE REFERENCE ST14

Dear Paul

You should have received an upload link from myself via the Doqex Software.

In the interest of the councils security protocols it is our standard procedure to use this software for all of our large file transfers both incoming and outgoing.

The email you have received should contain a link where you can add multiple files.

Should you choose to use this system you do not need a password or pin as the link we have provided is bespoke to you.

We do ask however, that you also submit a representation via email to localplan@york.gov.uk stating a list of the documents you will be uploading so that we have a record on the email system and can be sure we have received all files.

In addition we ask that you name any files logically so that we can clearly tell by the title of the file who the submission is from and what it relates to.

We hope this information is clear and will be happy to assist you with any problems.

Kind Regards

From: Paul Butler [<mailto:paul.butler@pbplanning.co.uk>]
Sent: 04 April 2018 12:09
To: localplan@york.gov.uk; Slater, Michael
Cc: Richard Wood; woolley william; Morris, Peter; Tate, Liam
Subject: CITY OF YORK LOCAL PLAN – LAND WEST OF WIGGINTON ROAD – BARRATT HOMES & DAVID WILSON HOMES AND TW FIELDS – CLIFTON GATE - SUPPORT FOR SITE REFERENCE ST14

Dear Sir or Madam,

We write on behalf of our clients Barratt Homes & David Wilson Homes (BDW) and TW Fields (TWF) to provide City of York Council (CYC) with their representations to CYC's Publication Draft Local Plan (February 2018) with regards to Strategic Site Allocation Ref. ST14.

From a review of the latest version of the Local Plan, it is clear that CYC have not taken on board the evidence we previously presented in our representations to earlier versions of the Local Plan, by letters dated 12th September 2016 and 27th October 2017. Our latest enclosed representations do not seek to re-iterate the comments made to CYC in our previously submitted representations. These are enclosed, and we request that they are submitted alongside this letter to the Secretary of State as a holistic and comprehensive representation for the Land to the West of Wigginton Road (Site Ref. ST14), which we refer to as Clifton Gate.

The enclosed representations do however provide a summary of the comments previously made, before providing an update in our response to CYC's evidence base in association with the deliverability of this site and the objectively assessed housing needs of the City.

Our client's **support** CYC's identification of the site as a new Garden Village within the emerging City of York Local Plan. However, we wish to make it clear from the outset that we have concerns with the current red line site allocation boundary. Whilst the site can deliver 1,348 homes within the plan period within CYC's current site red line site allocation boundary, it is our view that the current boundary should be expanded in order to enhance the community and green infrastructure that the site can deliver in respect of the policy aspirations required by Policy SS12 of the Publication Draft Local Plan.

Within the submitted representations we identify that there is a legal process which CYC can undertake in order to amend the red line site allocation boundary ahead of the submission of the Local Plan to the Secretary of State.

The enclosed representations also present a compelling case for the release of additional land as housing allocations within the emerging CYC Local Plan in order to meet the City's full objectively assessed housing needs. Consequently, we have presented three potential development options to the Council to provide a new Garden Village of either 1,350 homes; 1,725 homes; or 2,200 homes alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities.

We would like to work alongside CYC to finalise the site specific strategic development policy to be included within future versions of the Local Plan. Working together we can ensure that CYC's and the local community's planning parameters for the site are deliverable. Should you require any further details or clarification on the content of this letter please do not hesitate to contact me.

Due to the size of the enclosures we submitted with our previous representations, can we please ask that CYC provide us with their file share link so that these documents can be sent through today. For the avoidance of any doubt, CYC have previously received copies of these documents. We would just like to submit them once more for completeness.

Kind regards,

Paul

Paul Butler
Director



www.pbplanning.co.uk

paul.butler@pbplanning.co.uk

07970 506702
01904 731365

PO Box 827, York, YO31 6EE

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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		Paul
Last Name		Butler
Organisation (where relevant)	TW Fields and Barratt Homes & David Wilson Homes	PB Planning Ltd
Representing (if applicable)		TW Fields and Barratt Homes & David Wilson Homes
Address – line 1	c/o Agent	PO Box 827
Address – line 2		York
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		YO31 6EE
E-mail Address		paul.butler@pbplanning.co.uk
Telephone Number		07970 506702

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)

Please see enclosed submitted 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	<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.

See enclosed representations

Policy Ref.

See enclosed representations

Site Ref.

Site Ref. ST14

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 enclosed submitted representations

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 enclosed submitted 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:

Please see enclosed submitted representations

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

04.04.18

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

Local Plan,
 City of York Council,
 West Offices,
 Station Rise,
 York,
 YO1 6GA

12th September 2016

Dear Sir or Madam,

CITY OF YORK LOCAL PLAN – LAND WEST OF WIGGINTON ROAD – BARRATT HOMES & DAVID WILSON HOMES AND TW FIELDS – CLIFTON GATE - SUPPORT FOR SITE REFERENCE ST14

We write on behalf of our clients Barratt Homes & David Wilson Homes (BDW) and TW Fields (TWF) to provide City of York Council (CYC) with further information in respect of the deliverability of their land interest at Land to the West of Wigginton Road (referred to as Clifton Gate) which is currently proposed by CYC as a new garden village within the emerging City of York Local Plan. Our clients fully **support** the principle of the proposed allocation of the site by CYC within the Preferred Sites Document (July 2016).

These site specific representations should be read in conjunction with BDW’s overarching representations prepared by Barton Willmore, which make comments upon the overall soundness of the emerging CYC Local Plan, including the level of homes proposed in the plan, the use of windfall sites in meeting the Council’s housing requirement, the exclusion of safeguarded land and the site selection process.

Site ST14 – Representations Summary
<ul style="list-style-type: none"> • We fully support the principle of the proposed allocation of the site by CYC. • The allocation boundary needs to be expanded in order to deliver a minimum of 1,350 homes at the site. • Two deliverable and viable development proposals are being put forward for CYC’s consideration: <ul style="list-style-type: none"> ○ The delivery of 1,350 homes at the site alongside each of CYC’s proposed “Planning Principles”. ○ The delivery of 1,725 homes at the site to meet any potential increase in the City’s housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site. • The proposals will deliver a Garden Village design philosophy with the provision of substantial community infrastructure including a primary school, village centre and public open space and recreational facilities. • The net developable residential area of both of the proposed options is smaller than the current allocation site area prescribed by CYC. • The historic and landscape character of this area of the City will be preserved as key views to York Minster are maintained and strategically placed open space on the site’s boundaries alongside the site’s existing woodland areas will deliver permanent future boundaries to the site. • Separation distances between the site and surrounding areas are substantial. The distance between the site’s western boundary to Skelton is 1km; its eastern boundary to Wigginton Road is 600m; and its southern boundary to Clifton Moor is 460m. • Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south). Appropriate contributions will be delivered for highways upgrades. Land can also be made available for the potential future widening of the A1237. • Pedestrian and cycle connections will be provided throughout the site, with connectivity to existing links and Clifton Moor via a proposed foot bridge. • The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

Our proposals have the potential to provide for a new garden village of either 1,350 new homes or 1,725 homes, alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities. The site is strategically located to the north of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services at Clifton Moor. Importantly, there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

This letter sets out our client's design philosophy for the proposed development of a 21st Century Garden Village at the Clifton Gate site and demonstrates the site's deliverability for residential development in accordance with national planning guidance. In doing so the letter refers to the following documents which are enclosed: -

- Visual Document – JTP/Turkington – August 2016
- 1,350 Home Illustrative Masterplan – JTP – August 2016
- 1,725 Home Illustrative Masterplan – JTP – August 2016
- 1,350 Home Land Use Plan; Land Use Schedule & Key – JTP – August 2016
- 1,725 Home Land Use Plan; Land Use Schedule & Key – JTP – August 2016
- Archaeology Statement - York Archaeological Trust – August 2016
- Outline Transport Strategy Report – Fore Consulting – September 2016
- Ecology Statement – Baker Consulting – September 2016
- Utilities Statement – Arup – September 2016

The documents referenced above provide an update of the comprehensive technical reports which were previously submitted to CYC in the promotion of the larger site area. The parameters established within the comprehensive technical reports were utilised in the preparation of the new indicative masterplan for the site. Full versions of each of the above listed reports are of course available on request.

PROPOSED DEVELOPMENT OPTIONS

As identified above, there are two potential masterplan options associated with the development of the site: -

1. The delivery of 1,350 homes at the site to align with CYC's proposed housing numbers within the Preferred Sites Document. This masterplan option represents a deliverable and viable opportunity to meet CYC's current proposed housing numbers for the site, whilst also ensuring that each of CYC's proposed "Planning Principles" are delivered.
2. The delivery of 1,725 homes at the site to meet any potential increase in the City's housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC's proposed "Planning Principles" for the site. This option could also deliver an increase in economic and social benefits associated with the delivery of more homes at the site.

The vision of the proposals is to deliver a landscape led development which is separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The proposed development options have been formulated following the undertaking of ecology, landscape, Green Belt, archaeology, drainage, infrastructure and highways assessments. Both proposals seek to deliver a Garden Village development, community facilities and substantial areas of recreation and amenity space.

CYC Development Parameters

CYC's Preferred Sites Consultation document identifies the following parameters associated with the proposed development of the site: -

1. *Site Size/Developable Area – 55Ha*
2. *Indicative Site Capacity – 1,348 homes (845 within plan period)*
3. *Archetype/Density – Strategic Site – 70% net site area at 35dph*
4. *Proposed Allocation – Allocated for residential development for 1348 dwellings*
5. *Planning Principles: -*
 - a. *Deliver a sustainable housing mix in accordance with CYC’s most up to date housing needs evidence.*
 - b. *Creation of a new ‘garden’ village that reflects the existing urban form of York.*
 - c. *Create a Local Centre incorporating appropriate shops, services and community facilities.*
 - d. *Deliver on site accessible combined nursery and primary education facilities.*
 - e. *Secure developer contributions for secondary school places.*
 - f. *Ensure provision of new all-purpose access roads to the east/south from A1237 Outer Ring Road/Wigginton Road roundabout and off the Wigginton Road/B1363.*
 - g. *Deliver local capacity upgrades to the outer ring road in the vicinity of the site.*
 - h. *Opportunities to provide grade separated, dedicated public transport routes across the A1237 should be explored.*
 - i. *Deliver high quality, frequent and accessible public transport services throughout the development site.*
 - j. *Ensure the provision of high quality, safe, direct and accessible pedestrian and cycle links within the Village; to Clifton Moor via a foot bridge over the A1237; to surrounding green networks; and to existing pedestrian and cycle links.*
 - k. *Maintain landscape buffers around the site to prevent coalescence with adjacent settlements and maintain the setting of the City and the village of Skelton.*
 - l. *Create strategic greenspace to the west of the site to reduce the physical and visual proximity of the development area to Skelton.*
 - m. *Protect and enhance local green assets, trees and hedge-lines and enhance existing landscape character.*

CYC Planning Parameters Comparison with BDW & TWF Development Options

The table below provides a comparison of the CYC's identified aspirations for the site (outlined above) against the planning principles proposed by BDW & TWF's two development options. Evidence to substantiate the inputs are set out in further detail below and within the enclosed documentation. Particular reference should be given to the enclosed Land Use Plan, Land Use Schedule and Indicative Masterplan for each of the development options.

Ref.	CYC	BDW/TWF Option 1	BDW/TWF Option 2
1. Site Size	55Ha	65.36Ha	72.73Ha
2. Site Capacity	1,348 Homes (845 Plan Period)	1,350 Homes (All within the plan period)	1,725 Homes (1,590 within the plan period and 1,725 within one year beyond the plan period)
3. Density	Strategic Site – 70% net site area at 35dph	Garden Village – 40.02Ha net site area at 32dph	Garden Village – 51.57Ha net site area at 32dph
4. Allocation	1,348 Homes	1,350 Homes	1,725 Homes
CYC Planning Parameters			
5(a)	Sustainable Housing Mix	Site can deliver a variety of housing needs including first time buyers, detached family homes and homes for senior citizens.	Site can deliver a variety of housing needs including first time buyers, detached family homes and homes for senior citizens. Can also help to deliver additional homes should CYC's annual housing requirement increase.
5(b)	Garden Village	60% net developable area at 32dph will ensure the delivery of a Garden Village.	60% net developable area at 32dph will ensure the delivery of a Garden Village.

5(c)	Local Centre	2.3Ha of land for a Local Centre	2.3Ha of land for a Local Centre
5(d)	Nursery/Primary Education	2.26Ha of land provided for Nursery and a two form entry Primary Education.	2.26Ha of land provided for Nursery and a two form entry Primary Education.
5(e)	Secondary Education Contributions	Appropriate contributions will be delivered for secondary education.	Appropriate contributions will be delivered for secondary education.
5(f)	New Access Roads East & South	Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south)	Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south)
5(g)	Local Highways Upgrades	Appropriate contributions will be delivered for highways upgrades. Land can also be made available for potential future widening of the A1237.	Appropriate contributions will be delivered for highways upgrades. Land can also be made available for potential future widening of the A1237.
5(h)	Dedicated Public Transport Routes	A bus route will be provided through the site, via the A1237 and Wigginton Road access points. Pedestrian/Cycle connections will be delivered to existing links with a footbridge proposed to link to Clifton Moor.	A bus route will be provided through the site, via the A1237 and Wigginton Road access points. Pedestrian//Cycle connections will be delivered to existing links with a footbridge proposed to link to Clifton Moor.
5(i)	Public Transport Services	Masterplan designed to accommodate a bus route through the site, via the A1237 and Wigginton Road access points.	Masterplan designed to accommodate a bus route through the site, via the A1237 and Wigginton Road access points.
5(j)	Pedestrian & Cycle Links	Provided throughout the site with connectivity to existing links and Clifton Moor via a proposed foot bridge.	Provided throughout the site with connectivity to existing links and Clifton Moor via a proposed foot bridge.
5(k)	Coalescence with Surrounding Settlements	Key views to York Minster are preserved. Positioning of open space on western boundary; substantial landscaping on all of the site's boundaries; and retention of existing woodland areas ensures delivery of permanent future boundaries to the site. Distance from the site's western boundary to Skelton is 1km; eastern boundary to Wigginton Road is 600m; and southern boundary to Clifton Moor is 460m	Key views to York Minster are preserved. Positioning of open space on western boundary; substantial landscaping on all of the site's boundaries; and retention of existing woodland areas ensures delivery of permanent future boundaries to the site. Distance from the site's western boundary to Skelton is 1km; eastern boundary to Wigginton Road is 600m; and southern boundary to Clifton Moor is 413m
5(l)	Green Space on Western Boundary	16.4Ha of Open Space within the site and substantial areas of green space on the site's western boundary. Distance from the site's western boundary to Skelton is 1km.	12.25Ha of Open Space within the site and substantial areas of green space on the site's western boundary. Distance from the site's western boundary to Skelton is 1km.
5(m)	Protect & Enhance Green Assets	All of the site's existing green assets are sought to be maintained and enhanced where possible.	All of the site's existing green assets are sought to be maintained and enhanced where possible.

The comparison provided in the table above establishes that BDW & TWF's development options will deliver CYC's key planning parameters as set out within the Preferred Sites Consultation document.

Though BDW & TWF support CYC's proposed allocation of the site, the evidence presented in the table above and the enclosed documentation, clearly demonstrates that the allocation boundary needs to be expanded in order to deliver a minimum of 1,350 homes at the site. This is in association with the delivery of a Garden Village design philosophy and the provision of substantial community infrastructure

including a primary school, village centre and public open space and recreational facilities. Importantly, the increase in land area would not have an impact on coalescence with surrounding settlements as a **1km** separation distance would be retained between the site and Skelton; **600m** between the site and Wigginton Road; and **460m** between the site and Clifton Moor.

One further important factor that we would like to raise CYC's attention to is the net developable area proposed within each of the two above options. CYC's proposed allocation amounts to **1,348 homes within 55ha** of land in total. It is our understanding that this area predominantly relates to the residential areas of the site, with the provision of public open space and recreational facilities being located on the site's edges, as proposed within the Preferred Sites Document. We set out in the table above, and within the enclosed land use schedules for each of the two development options, that the net developable areas for the two proposed options are **1,350 homes within 40.02Ha** of land and **1,725 homes within 51.57Ha** of land. Both areas are of course lower than that prescribed by CYC. The gross areas of land associated with both of our client's development options are above the 55ha figure, however, the additional land areas include a primary school, nursery, village centre, public open spaces and recreational facilities, including allotments. The increase in land area is entirely associated with the creation of a Garden Village which benefits from substantial community infrastructure. Creating a new settlement where people will truly want to live.

The similarities between both of BDW & TWF's development options are clear. Whilst both represent deliverable and viable development opportunities to deliver a significant proportion of the City's housing needs, the difference between the two is associated with the increase in proposed residential dwellings and, of course, the proportionate economic and social benefits associated with the delivery of more homes from the site. The two proposed development options at the site can deliver the following economic and social benefits to the City of York: -

- Creating sustainable communities through meeting market and affordable housing needs, offering existing and potential residents of the City the opportunity to live in the type of house and location they desire.
- Delivering significant financial contributions towards the improvement of the City's infrastructure including the provision of S106/CIL payments and land for the potential widening of the A1237 ring road in the future.
- New capital expenditure in the region of between £163m to £208m creating substantial direct and indirect employment opportunities of approximately 361 to 461 new jobs of which 70% are usually retained in the local area.
- Sustaining and improving the District's labour market through delivering the right homes in the right locations.
- Increasing retail and leisure expenditure in the local area by between £32m to £41m per annum, creating a potential 196 to 250 jobs in these sectors.
- Provision of funding towards public services from an estimated figure of between £12.4m to £15.8m from the Government's new homes bonuses and annual Council tax payments of between £2.07m to £2.6m per annum.

It is clear that the development of 1,350 homes or 1,725 homes as part of a new Garden Village can deliver substantial economic, social and environmental benefits to the local area and wider City.

The National Planning Policy Framework seeks to encourage sustainable growth and identifies in Paragraph 8 that economic growth, such as that which this site can deliver, can secure higher social and environmental standards. Furthermore, Paragraph 52 identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements that follow the principles of Garden Cities (or a Garden Village in this case).

Paragraph 52 of the Framework further states that in such circumstances local planning authorities should consider opportunities to provide the best way of achieving sustainable development. The remaining sections of this letter consider the economic, social and environmental impact and benefits of the proposed development options in further detail.

A NEW 21ST CENTURY YORKSHIRE GARDEN VILLAGE – PRESERVING THE CHARACTER AND SETTING OF YORK

A Vision Document, prepared jointly by JTP Architects and Turkington Martin Landscape Architects, is submitted alongside these representations. The document identifies the vision to deliver: -

A new village with its own identity and good local facilities to meet the everyday needs of residents as the community grows over time. A new village which is well-connected to the centre of York and surrounding settlements by sustainable modes of transport but clearly separated and screened from existing settlements to avoid coalescence. A place that feels a part of York but is still a separate place.

The vision for the site's development, as set out within the development masterplans which are enclosed within the document, has been prepared following a comprehensive assessment of the landscape character of the site and the surrounding areas.

One of the key characteristics of York is how the city developed out from its historic core in the form of radial corridors separated by a series of green fingers. The proposed site aligns with one of these development corridors which extends radially outwards north-west of York City Centre. The proposed development sits between two green fingers, consisting of the Ouse Corridor to the west of the site, and Bootham Stray to the east. These green fingers positively contribute towards York's green infrastructure network, enhancing the amenity and biodiversity value of existing routes into the city centre and links nature conservation sites with other open space. They also preserve the notion of approaching the city through the countryside.

The Outer Ring Road currently demarcates the urban area of York from the surrounding Green Belt countryside. Where settlements are close to this road, there is a separation distance ranging between 60m and 400m. This has the appearance of reinforcing the village character which is distinct from suburban York. This can be seen in the relationship of villages such as Poppleton, Earswick and Haxby with the ring road and the city beyond. The proposal to set the new development back 460m from the outer Ring Road as proposed would establish a village character, provide a distinct identity of the development, and reinforce the separation from the edge of York.

The built edge of the new village will be 1 kilometre from Skelton. The village will also be well screened from the east by existing mature woodland and set away from Wigginton Road; preserving the rural character of the route into the city centre.

Screening is provided by existing plantations to the east and mature hedgerows adjacent to Bur Tree Dam to the west, with proposed planting further restricting views into the site. The extent of screening landscape elements will result in distant glimpsed views into the new village centre from Wigginton Road, minimising visual impact on adjacent green corridors.

Existing fragmented woodland will be linked and strengthened with new tree planting, green spaces and sports pitches. A series of linked green spaces will encircle the village, providing recreation for the new community and ensuring a green buffer from Clifton Moor and a low density edge from the surrounding countryside. Sport pitches and school playing fields will be located between the village and Skelton to bring active uses into the open space between the two villages.

A new village centre with a cluster of local facilities around an attractive village square with a pond will provide a focus for the new village. The square will accommodate seasonal markets and events. There will also be a new cycle / footbridge link to Clifton Moor shopping centre. Small scale workshops, a health centre and older people's housing is also proposed.

Existing water features including ponds and streams will be incorporated into the new village layout. New water features relating to the Suds systems will also be added. These features will together form

an integral aspect of the new streets and open spaces adding character and drawing on precedents from surrounding villages.

Linear green spaces will run through the residential area and incorporate watercourses and existing hedgerows. These linking green spaces will create a network of pedestrian routes through the site and define individual neighbourhoods within the new development. They will accommodate a range of community and recreational facilities such as play areas and allotments. Importantly, the green corridors which run through the site have been positioned in order to preserve views of York Minster.

On account of the above we agree with CYC's conclusion that the site does not fulfil any of the five Green Belt purposes for the following reasons: -

- ***The development of the site would not result in unrestricted urban sprawl*** due to the masterplan vision of delivering a landscape character led new garden village that delivers new strong defensible landscape and greenspace boundaries;
- ***The development of the site would not result in the merging of adjacent settlements*** as the positioning of open space on the western boundary; substantial landscaping on all of the site's boundaries; and retention of existing woodland areas ensures delivery of permanent future boundaries to the site which are a distance of 1km from Skelton; 600m from Wigginton Road is; and 460m from Clifton Moor;
- ***The site does not assist in safeguarding the countryside from encroachment*** on account of the significant areas of open countryside that will remain surrounding the site, particularly to the north;
- ***The proposed development of the site will have no detrimental effect on the setting and special character of historic features*** as an assessment has been undertaken of the historic setting of York Minster and the masterplan options have been designed to preserve and where possible enhance the heritage assets within proximity of the site. Importantly, the proposed green corridors which run through the site have been positioned in order to preserve views of York Minster.
- The fifth purpose of Green Belt ***to assist in urban regeneration, by encouraging the recycling of derelict and other urban land*** is a general purpose which will not be adversely affected by the site.

SAFEGUARDING HISTORIC CHARACTER

Enclosed with these representations is an Archaeology Statement prepared by York Archaeological Trust (YAT). The enclosed statement is based on the YAT's archaeological investigations conducted in 2014. The area currently proposed for residential use was previously investigated with 48 trenches and 4 boreholes. The area identified for open space was investigated with 6 trenches. The area identified for SUDS use was investigated with 7 trenches and 6 boreholes.

The enclosed statement identifies that the site's archaeology has been affected by ploughing and extensive drainage systems across the site. YAT's opinion, supported by the City of York Archaeologist, is that there are no features or deposits identified in the evaluation exercise whose significance merits preservation in-situ. The archaeology present within the proposal site has the potential to enhance understanding of York's prehistory. The City of York Archaeologist has previously suggested that the impact of the development on this archaeology can be mitigated through an archaeological excavation and recording exercise. The City Archaeologist has also indicated that no further evaluation is necessary to inform an EIA, but it may be prudent to consider further evaluation in both the 'areas of interest' and the areas currently regarded as containing little archaeology in order to manage cost and programme risk.

Finally, there are opportunities for community engagement and outreach, both through direct involvement with archaeological work and through public lectures/press releases and publication. BDW & TWF would welcome further discussion with CYC to explore this potential.

DELIVERING A SUSTAINABLE & ACCESSIBLE SETTLEMENT

Enclosed with these representations is an Outline Transport Strategy Report prepared by Fore Consulting Limited (Fore). The document has been prepared to guide the promotion of the Clifton Gate site. It considers the strategic access and connectivity implications associated with development of up to 1,725 dwellings, and identifies a potential outline transport strategy.

The report identifies that the site is well located in relation to the existing wide range of retail and leisure uses within and adjacent to the Clifton Moor retail parks, plus employment uses at Clifton Moor industrial estate and business park. To ensure the long-term sustainability of the site, high quality, safe and convenient walking and cycling routes permeating through the allocation site will be required. These would link to new crossings on the A1237 Outer Ring Road adjacent the allocation site, and new footways and cycleways to link to the existing network of pedestrian and cycle routes linking to the city centre. To ensure permeability with surrounding areas a bus route will be provided through the site, via the A1237 and Wigginton Road access points, and pedestrian/cycle connections will be delivered to existing connections including a footbridge proposed to link to Clifton Moor.

Vehicle access would be taken from a new junction on the B1363 Wigginton Road, and a fourth arm at the A1237 Outer Ring Road / Clifton Moor Gate roundabout. Changes to the Clifton Moor Gate junction in particular will need to be carefully considered to take account of CYC's long-term aspirations to upgrade the A1237 Outer Ring Road, and potentially incorporate grade separation of pedestrian and cycle connections. As identified above, the development of the site offers the potential to make land available for the potential future widening of the A1237.

The report concludes by stating that the precise impacts, scale, form and phasing of necessary transport measures and highway works will need to be confirmed following collection of traffic data and detailed capacity assessment work that will be undertaken at the planning application stage. However, overall, it is considered that there is no reason in terms of transport and access that precludes the ST14 site from being allocated for residential use.

SAFEGUARDING BIODIVERSITY

Enclosed with these representations is an Ecology Statement prepared by Baker Consultants. The statement outlines the results of a number of ecological studies carried out at the site in 2013-2014 in order to provide an understanding of the ecological issues related to the proposed allocation. The likely ecological constraints to the allocation are also described, as are any requirements for additional survey work. Potential mitigation solutions as part of the planning and development process are also highlighted.

The enclosed report identifies that the following flora and fauna surveys have been undertaken at the Clifton Gate site: -

- Badger Surveys – November 2013;
- Winter Bird Surveys - 4 visits in November & December 2013 and January & February 2014
- Breeding Bird Surveys - Three surveys in April, May and June 2014
- Botanical survey of the Clifton Airfield SLI – May 2014
- Invertebrate survey of Clifton Airfield SLI - Two visits September 2014
- Barn owl surveys - April/May 2014
- Great crested newt surveys - Surveys during mid-March to mid-June 2014
- Reptiles surveys - Surveys during April & May 2014
- Bat activity transects & static detector installation - Three transects undertaken on and around the allocation site during April-July 2014. Static detectors placed on and around the site between April-September 2014

The results of the assessments identify that the Clifton Gate site provides habitats typical of lowland arable farmland, and the species associated with this type of landscape. Although there are features of

nature conservation interest present within the allocation site (and surrounding it), these are mostly in discrete areas of habitat rather than being present across the whole landscape.

The main habitat present – arable land – is of low nature conservation interest. The areas of hedgerow, woodland, and scrub are of greater interest and, due to their smaller size can be more easily incorporated into a residential development (and enhanced) as part of retained areas, landscaping and green infrastructure.

In terms of protected and notable species, great crested newts are known to be present locally, but are found in ponds outside of the allocation site. Bats and badgers are known to make some use of the site, but due to the dominance of the arable habitat, the levels of activity and population sizes within the area as a whole are expected to be low. A range of breeding and wintering birds is also present – but principally in defined areas of suitable habitat.

None of the ecological features outlined in this report are likely to represent a serious constraint to the development of the site. Appropriate site design and mitigation will be required, as for any project of this size – but the most adverse potential impact, habitat loss, is extremely limited due to the dominant existing arable land-use.

Careful scheme design means that a range of hedgerow, woodland and other ecological features will be retained and incorporated into the development and, in some cases, enhanced. For example, the proposed access road to the south passes through Clifton Airfield SLI, but makes use of an existing trackway to minimise any potential for ecological impacts.

The proposed variation in the number of residential units (1,348 or 1,750) is unlikely to make any significant difference to the level of ecological impact at the site. With either scheme, areas of valuable habitat will be able to be retained and suitable mitigation and enhancement provided. More important will be the suitable incorporation of ecological design principles into masterplanning and detailed site layouts, appropriate protection measures during construction, and the long-term landscape and ecological management of the site post-construction. This can be equally well delivered with either a 1,348 or 1,750 home scheme.

The statement concludes that although there are issues that would need to be dealt with during planning and construction of the site, these are reasonably standard for a development of this size and would be covered as part of the normal planning process. There is no significant ecological reason why the site should not be allocated for residential development for up to 1,725 homes.

DELIVERING NEW INFRASTRUCTURE

Enclosed with these representations is a Utilities Statement prepared by Arup, which provides an update on the assessment work which they previously undertook in 2014 in respect of the larger site allocation for circa 2,800 homes. The statement assesses likely implications of the proposed change in the size of the site and the quantum of development on Air Quality, Noise and Vibration, Flood Risk and Drainage, Geotechnical and Utilities.

The statement concludes by identifying that, based on the Environmental Statement work prepared in 2014, the site area can support a development of either 1350 dwellings or 1725 dwellings. The likely impacts of the development option would need to be validated through an updated Environmental Statement, however, the environmental effect of the development of a smaller site would of course be reduced compared to the previous 2,800 home development proposals.

The required mitigation to deliver either of the masterplan options can be provided within the site areas shown. To provide flexibility for the future approach to surface water management it would be beneficial to include additional land to provide SUDs ponds on the site's boundaries. The exact areas would be developed further thorough an updated Surface Water Strategy in due course, but additional land within the allocation would allow space for onsite surface water management.

MEETING THE CITY OF YORK'S FUTURE HOUSING NEEDS

As identified above, we believe that there is a case for the identification of additional housing allocations to those currently proposed by CYC in order to meet the City's housing needs over the proposed plan period.

BDW has instructed Barton Willmore to undertake a Technical Review of the Council's SHMA to consider the methodology that has been utilised in formulating the objectively assessed need. There are considered to be issues with the methodology that has been used and incorrect data has been used as the starting point for calculating the housing requirement for the City. Our Client therefore **objects** to the Council's objectively assessed need and considers that a more appropriate figure would range from 920 dwellings per annum to 1,070 dwellings per annum.

The identified increase in the City's housing annual housing requirement would render a need to deliver 79 to 229 more homes each year in the City over the period of 2012 to 2032. A total of **between 1,580 and 4,580** additional homes over this 20-year period. Accordingly, there is a strong planning case for the allocation of additional land for residential development, including an extension of our client's Clifton Gate site to deliver 1,725 homes.

Furthermore, Barton Willmore's representations also identify our client's **objection** to the approach taken by CYC with regard to the delivery of windfall development throughout the plan period, which currently stands at 152 dwellings per annum or approximately 18% of the City's overall housing requirement. The fundamental reason for the historically large figure of windfall site development in the City can be linked back to the lack of an adopted plan, which in turn places a huge reliance on windfall sites, as noted by CYC in paragraph 3.5 of the technical paper. There are therefore concerns that this figure is too high and a greater proportion of homes should be planned for through allocations. Such a reliance on unplanned development is contrary to the legislative provision of a plan-led system and should not form the basis of the CYC Local Plan moving forwards. Such an approach will not direct homes to those areas that have seen limited growth over recent years and have a clear need for new homes in the future.

Finally, Barton Willmore's representations also concur with concerns that PB Planning previously raised in respect of the deliverability of the York Central site. The representations share our conclusion that unless the current identified uncertainties of the site's deliverability are resolved, it is our shared view that the quantum of new homes to be delivered at York Central should be considered over and above the identification of housing allocations to meet the City's housing needs. If not, there is a real possibility that that the City could fail to demonstrate the delivery of sufficient number of deliverable housing sites to meet the City's housing requirement.

When each of the above points are considered holistically, there is a compelling case for the release of additional land as housing allocations within the emerging CYC Local Plan in order to meet the City's full objectively assessed housing needs, such as an extension of our client's Clifton Gate site to deliver 1,725 homes.

DELIVERY TIMESCALES

We envisage that a planning application will be submitted by Spring 2018, following the adoption of the Local Plan.

Taking into account the proposed submission date it is currently envisaged that first dwelling completions on the site will take place in 2019/20 following the submission of an outline planning application, subsequent reserved matters applications and initial site infrastructure works.

The potential size of the site offers the opportunity for three to four house builders developing the scheme simultaneously. Therefore, it is anticipated that the development will deliver a yield of at least 120 homes per annum with the potential to deliver up to 150 homes per annum. The table below

provides the site’s cumulative dwelling delivery projection per annum that CYC can use within their forthcoming housing trajectory work. A delivery projection is provided for both of the potential Development Options for the site.

Year	Development Option 1 - No of Homes Cumulative	Development Option 2 - No of Homes Cumulative
2018/2019	0	0
2019/2020	60	60
2020/2021	180	180
2021/2022	300	300
2022/2023	420	420
2023/2024	540	540
2024/2025	660	660
2025/2026	780	780
2026/2027	900	900
2027/2028	1,020	1,020
2028/2029	1,140	1,140
2029/2030	1,260	1,260
2030/2031	1,350	1,350
2031/2032		1,470
2032/2033		1,590
2033/2034		1,725

The proposed community infrastructure and areas of public open space will be delivered commensurate with the progression of the development and made available for use as required.

The development proposals can deliver significant benefits to the City of York alongside making a significant contribution to CYC’s housing requirements over the course of the plan period. In reference to CYC’s Preferred Sites Document, it is prudent to identify that the site has the potential to deliver 1,350 to 1,590 homes over the anticipated plan period. Which is a far greater contribution to the City’s housing needs to that currently identified by CYC.

Whilst the 1,725 home option would deliver homes only one year beyond the plan period, we would like to point out the benefit that this would deliver to CYC in respect of meeting ongoing housing needs and also safeguarding the release of land from the newly defined Green Belt boundary in advance of the adoption of the next Local Plan.

DELIVERABILITY ASSESSMENT

In accordance with Footnote 11 of Paragraph 47 of the National Planning Policy Framework, we believe that the site can be considered as a **Deliverable** residential development site on account of: -

Suitability

The site is located in a suitable location for residential development now. As identified above, the development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services and there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

Availability

The site is available for development now. The site is available for residential development as there are no legal or ownership constraints as all landowners have made the land available for development. BDW & TWF have an interest in the site and by virtue of this and previous submissions are expressing an intention to develop the site for residential use.

Achievability

A viable housing development can be delivered on the site within the next five years and indeed within the first five years of the adoption of the Local Plan. BDW & TWF are seeking to develop the site for residential use. Prior to the progression of development sites, they undertake a thorough marketing and economic viability assessment for each site, including an assessment of any site specific abnormal costs. The site is considered to be achievable for residential development now as there is a realistic prospect that the site can deliver new homes within the next five years and indeed within the first five years of the adoption of the Local Plan.

Deliverability Conclusion

The site can be considered a deliverable residential development site and its release would deliver a number of significant economic, social and environmental benefits as identified above.

Furthermore, it is clear that the evidence provided within this letter and the enclosed documentation demonstrates that each of the factors raised within CYC's Interim Sustainability Appraisal (2016) will be responded to appropriately as follows: -

- The site will provide 1,350 homes to 1,750 homes which will be significantly positive for meeting the City's housing needs.
- New public transport and pedestrian/cycle access (via a new foot bridge) will be provided to existing services at Clifton Moor.
- Due to the scale of the potential development, commensurate facilities will also be provided within the new Garden Village, whilst sustainable transport links will be provided to existing routes which surround the site.
- Archaeological evaluation of the site has taken place and the required mitigation techniques have been discussed and agreed with officers of CYC.
- The development proposals have been refined to ensure that the separation distances from existing settlement areas are substantial. The closest development boundary to Skelton is 1km and there is also a 600m distance to Wigginton Road and over 400m to Clifton Moor. New and existing substantial landscaping is provided on all of the site's boundaries to ensure that views onto the new Village will be sympathetic, will reflect the existing character of the area and in some cases will help to mask views from existing settlement areas onto Clifton Moor retail and industrial park. A full landscape character analysis has also enabled the important views through the site to be preserved, including views of York Minster.
- The site is located in Flood Risk Zone 1 and the development of the site will safeguard and enhance existing features of biodiversity value where possible.

CONCLUSIONS

On the basis of the information provided within this letter, and the enclosed documentation, we wish to place on record our **support** for the proposed allocation of Land to the West of Wigginton Road which is currently proposed by CYC as a new Garden Village within the emerging City of York Local Plan.

Whilst we support the principles of the allocation of the site, we believe that amendments are required to the site's proposed boundaries in order to ensure that CYC's Garden Village philosophy for the site can be delivered alongside each of CYC's identified Planning Parameters.

Our proposals have the potential to provide a new Garden Village of either 1,350 new homes or 1,725 homes, alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities. The site is strategically located to the north of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible.

The development proposals are situated in a **suitable** and highly sustainable location and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. The site is **available** now as it is under the control of a national house builder and regional development company who are actively seeking to secure planning permission for the residential development of the site. The site can also be considered **achievable** as our clients can deliver new homes on the site within the next five years and indeed within the first five years of the Local Plan.

Finally, in respect of procedural matters, we would like to work alongside CYC to formulate a site specific strategic development policy to be included within future versions of the Local Plan. Working together we can ensure that CYC's and the local community's planning parameters for the site are deliverable.

Should you require any further details or clarification on the content of this letter please do not hesitate to contact me.

Yours sincerely,



PAUL BUTLER

Director

paul.butler@pbplanning.co.uk

Local Plan,
 City of York Council,
 West Offices,
 Station Rise,
 York,
 YO1 6GA

27th October 2017

Dear Sir or Madam,

CITY OF YORK LOCAL PLAN – LAND WEST OF WIGGINTON ROAD – BARRATT HOMES & DAVID WILSON HOMES AND TW FIELDS – CLIFTON GATE - SUPPORT FOR SITE REFERENCE ST14

We write on behalf of our clients Barratt Homes & David Wilson Homes (BDW) and TW Fields (TWF) to provide City of York Council (CYC) with further information in respect of the deliverability of their land interest at Land to the West of Wigginton Road (referred to as Clifton Gate) which is currently proposed by CYC as a new garden village within the emerging City of York Local Plan. Our clients fully **support** the principle of the proposed allocation of the site by CYC within the Pre-Publication Draft document (September 2017).

These site-specific representations provide an update of those submitted to CYC dated 12th September 2016 and should be read in conjunction with BDW’s overarching representations prepared by Barton Willmore. The Barton Willmore representations comment upon the overall soundness of the emerging CYC Local Plan, including the level of homes proposed in the plan.

Site ST14 – Representations Summary
<ul style="list-style-type: none"> • We fully support the principle of the proposed allocation of the site by CYC. • The allocation boundary needs to be expanded in order to deliver a minimum of 1,350 homes at the site. • Three deliverable and viable development proposals are being put forward for CYC’s consideration: <ul style="list-style-type: none"> ○ The delivery of 1,350 homes at the site alongside each of CYC’s proposed “Planning Principles”. ○ The delivery of 1,725 homes at the site to meet any potential increase in the City’s housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site. ○ The delivery of up to 2,200 homes at the site to meet any potential increase in the City’s housing requirements or the need to ensure permanence to the City’s Green Belt, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site. • The proposals will deliver a Garden Village design philosophy with the provision of substantial community infrastructure including a primary school, village centre, public open space and recreational facilities. • The net developable residential area of each of the proposed options are either smaller or similar in size to the current allocation site area prescribed by CYC. • The historic and landscape character of this area of the City will be preserved as key views to York Minster are maintained and strategically placed open space on the site’s boundaries alongside the site’s existing woodland areas will deliver permanent future boundaries to the site. • Separation distances between the site and surrounding areas are substantial. The distance between the site’s western boundary to Skelton is 1km; its eastern boundary to Wigginton Road is 0.6km; and its southern boundary to Clifton Moor is between 0.25km and 0.46km (depending on which site option is progressed). • Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south). Appropriate contributions will be delivered for highways upgrades. Land can also be made available for the potential future widening of the A1237.

- Pedestrian and cycle connections will be provided throughout the site, with connectivity to existing links and Clifton Moor via a proposed subway under the future upgraded A1237.
- The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

Our proposals have the potential to provide for a new garden village of either 1,350; 1,725; or up to 2,200 new homes, alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities.

The site was previously identified as strategic housing site allocation ST14 within the withdrawn City of York Publication Draft Local Plan (October 2014). At that time CYC proposed the delivery of 2,800 homes at the site. Whilst each of the development options identified below relate to a figure lower than 2,800 homes, all the technical reports associated with the development of the site were originally undertaken in relation to the larger site area. Comprehensive community consultation work with local stakeholders, including a Community Planning Weekend, was also undertaken in respect of the larger site area. Consequently, there remains the potential for the enlargement of the allocation back to the previously considered acceptable size, should CYC need to do so to meet the City's increased housing needs.

The site is strategically located to the north of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services at Clifton Moor. Importantly, there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

This letter sets out our client's design philosophy for the proposed development of a 21st Century Garden Village at the Clifton Gate site and demonstrates the site's deliverability for residential development in accordance with national planning guidance. In doing so the letter refers to the following documents which are enclosed: -

- Visual Document – JTP/Turkington – August 2016
- Illustrative Masterplan – JTP – August 2016
- 1,350 Home Land Use Plan; Land Use Schedule & Key – JTP – August 2016
- 1,725 Home Land Use Plan; Land Use Schedule & Key – JTP – August 2016
- 2,200 Home Land Use Plan; Land Use Schedule & Key – JTP – October 2017
- Archaeology Statement - York Archaeological Trust – August 2016
- Outline Transport Strategy Report – Fore Consulting – September 2016
- Ecology Statement – Baker Consulting – September 2016
- Utilities Statement – Arup – September 2016

The documents referenced above provide an update of the comprehensive technical reports which were previously submitted to CYC in the promotion of the original larger site area proposed for allocation by CYC within the withdrawn City of York Publication Draft Local Plan (October 2014). The parameters established within the comprehensive technical reports were utilised in the preparation of the new indicative masterplans for the site. Full versions of each of the above listed reports are of course available on request.

With regards to our proposed Option 2, which recommends the delivery of 1,725 homes at the site, in order to meet an evidenced increase to the City's housing requirements, CYC's Officer's endorsed an increase in the proposed site allocation from 55ha (1,348 homes) to 68ha (1,672 homes) to CYC's Local Plan Working Group on the 10th July 2017. The reasoning behind the recommendation was as follows:

“This reflects developers/landowners concerns regarding the viability/deliverability of the site and the ability to deliver the planning principles including the significant infrastructure requirements given the sites location adjacent to the A1237.”

Whilst CYC’s Officer’s recommendation wasn’t approved at the time, we believe there is still a strong case for the expansion of the site in respect of both size and housing numbers. Whilst we support CYC’s Officer’s recommendation, it remains our view that in order to deliver a truly exemplar new Garden Village, the site allocation should be expanded to **a minimum** of “72.73Ha in total and 1,725 homes (at 32dph on 53.96ha net residential developable area)” for the reasons identified within these representations; the reasoning provided by CYC’s Officers; and due to the potential need to deliver additional homes from the site to meet the increased housing needs of the City.

With regard to our proposed Option 3, the new 2,200 home opportunity for the development of the site is being put forward for CYC’s consideration on account of the potential need for additional housing numbers as result of the Government’s recent announcement associated with a standardised methodology for calculating annual housing requirements; the need for CYC to ensure enduring and permanent Green Belt boundaries beyond the plan period; and as result of CYC’s recent Housing Infrastructure Bid to the Government, which could result in an accelerated delivery of new homes at the site. The planning arguments associated with the newly proposed third option are discussed in further detail below.

PROPOSED DEVELOPMENT OPTIONS

As identified above, there are three potential masterplan options associated with the development of the site: -

1. The delivery of 1,350 homes at the site to align with CYC’s proposed housing numbers within the Pre-Publication Draft Local Plan Document. This masterplan option represents a deliverable and viable opportunity to meet CYC’s current proposed housing numbers for the site, whilst also ensuring that each of CYC’s proposed “Planning Principles” are delivered.
2. The delivery of 1,725 homes at the site to meet any potential increase in the City’s housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site. This option could also deliver an increase in economic and social benefits associated with the delivery of more homes at the site.
3. The delivery of up to 2,200 homes at the site to meet any potential increase in the City’s housing requirements or the need to ensure permanence to the City’s Green Belt, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site.

The vision of the proposals is to deliver a landscape led development which is separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The proposed development options have been formulated following the undertaking of ecology, landscape, Green Belt, archaeology, drainage, infrastructure and highways assessments. Each of the proposals seek to deliver a Garden Village development, community facilities and substantial areas of recreation and amenity space.

CYC Development Parameters

CYC’s Pre-Publication Draft consultation document identifies the following parameters associated with the proposed development of the site: -

1. *Site Size/Developable Area – 55Ha*
2. *Indicative Site Capacity – 1,348 homes (1,200 within plan period)*
3. *Archetype/Density – Strategic Site – 70% net site area at 35dph*

4. *Planning Principles: -*

- i. *Creation of a new 'garden' village that reflects the existing urban form of York, of the main York Urban area 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. *Create a Local Centre incorporating appropriate shops, services and community facilities to meet the needs of future residents.*
- iv. *Deliver on site accessible combined nursery and primary education facilities, which are well connected to housing by a dedicated pedestrian/cycleway.*
- v. *Secure developer contributions for secondary school places as necessary to meet the need for new places.*
- vi. *Ensure provision of new all-purpose access roads to the east/south from A1237 Outer Ring Road/Wigginton Road roundabout and off the Wigginton Road/B1363. The internal layout of any future development on the site could be such that it creates discrete sectors, each with a specific access.*
- vii. *Demonstrate that all transport issues have been addressed, in consultation with the Council as necessary, to ensure sustainable transport provision at the site is achievable. The impacts of the site individually and cumulatively with site's ST7, ST8, ST9, ST15 and ST35 should be addressed.*
- viii. *Deliver local capacity upgrades to the outer ring road in the vicinity of the site, to include associated infrastructure to protect public transport journey times on junction approaches. Opportunities to provide grade separated, dedicated public transport routes across the A1237 should be explored in feasibility, viability and cost-benefit terms.*
- ix. *Deliver high quality, frequent and accessible public transport services throughout the development site, which provide links to other local rural communities where feasible, as well as to main employment centres. It is envisaged such measures will enable upwards of 15% of trips to be undertaken using public transport.*
- x. *To encourage the maximum take-up of more active forms of transport (walking and cycling), ensure the provision of high quality, safe, direct and accessible pedestrian and cycle links which create well-connected internal streets and walkable neighbourhoods including to:*
 - a) *the community, retail and employment facilities immediately to the south, (likely to take the form of an overbridge);*
 - b) *the surrounding green infrastructure network (with particular regard to public rights of way immediately west of the site and improvements to A1237 crossing facilities); and*
 - c) *existing pedestrian and cycle networks across the city.*
- xi. *Maintain landscape buffers around the site to prevent coalescence with adjacent settlements and maintain the setting of the City and the village of Skelton.*
- xii. *Protect and enhance local green assets, trees and hedge-lines and enhance existing landscape character.*
- xiii. *Provide open space to the west of the site to minimise the visual proximity of the development areas to Skelton.*

CYC Planning Parameters Comparison with BDW & TWF Development Options

The table below provides a comparison of the CYC's identified aspirations for the site (outlined above) against the planning principles proposed by BDW & TWF's three development options. Evidence to substantiate the inputs are set out in further detail below and within the enclosed documentation. Particular reference should be given to the enclosed Land Use Plan, Land Use Schedule and Indicative Masterplan for each of the development options.

Ref.	CYC	BDW/TWF Option 1	BDW/TWF Option 2	BDW/TWF Option 3
1. Site Size	55Ha	65.36Ha	77.56Ha	101.53Ha
2. Site Capacity	1,348 Homes (1,200 Plan Period)	1,350 Homes (All within the plan period)	1,725 Homes (All within the plan period)	2,200 Homes (Potential for up to 2,200 homes within the plan period)
3. Density	Strategic Site – 70% net site area at 35dph	Garden Village – Approximately 60% to 70% net developable area – 42.32Ha net site area at 32dph	Garden Village – Approximately 60% to 70% net developable area - 53.92Ha net site area at 32dph	Garden Village – Approximately 60% to 70% net developable area - 67.92Ha net site area at 32dph
CYC Planning Parameters				
4(i)	Garden Village	Approximately 60% to 70% net developable area at 32dph will ensure the delivery of a Garden Village.	Approximately 60% to 70% net developable area at 32dph will ensure the delivery of a Garden Village.	Approximately 60% to 70% net developable area at 32dph will ensure the delivery of a Garden Village.
4(ii)	Sustainable Housing Mix	Site can deliver a variety of housing needs including first time buyers, detached family homes, homes for senior citizens, build for rent and affordable housing.	Site can deliver a variety of housing needs including first time buyers, detached family homes, homes for senior citizens, build for rent and affordable housing. The site can also help to deliver additional homes should CYC's annual housing requirement increase.	Site can deliver a variety of housing needs including first time buyers, detached family homes, homes for senior citizens, build for rent and affordable housing. The site can also help to deliver additional homes should CYC's annual housing requirement increase.
4(iii)	Local Centre	2.3Ha of land for a Local Centre	2.3Ha of land for a Local Centre	2.3Ha of land for a Local Centre
4(iv)	Nursery/Primary Education	2.26Ha of land provided for Nursery and a two-form entry Primary Education.	2.26Ha of land provided for Nursery and a two-form entry Primary Education.	2.26Ha of land provided for Nursery and a three-form entry Primary Education.
4(v)	Education Contributions	Appropriate contributions will be delivered for secondary education.	Appropriate contributions will be delivered for secondary education.	Appropriate contributions will be delivered for secondary education.
4(vi)	New Access Roads East & South	Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south). For the avoidance of any doubt, no access is being proposed from the Wigginton Road/A1237 roundabout. For the avoidance of any doubt, there will be no access/egress from Moor Lane.	Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south). For the avoidance of any doubt, no access is being proposed from the Wigginton Road/A1237 roundabout. For the avoidance of any doubt, there will be no access/egress from Moor Lane	Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south). For the avoidance of any doubt, no access is being proposed from the Wigginton Road/A1237 roundabout. For the avoidance of any doubt, there will be no access/egress from Moor Lane

4(vii)	Individual & Cumulative Transport Impact	BDW/TWF will work alongside CYC and other developers where necessary in order to ensure that the individual and cumulative highways impact on the City is mitigated. Detailed discussions have already taken place with CYC to agree the site-specific access solutions for the development proposals.	BDW/TWF will work alongside CYC and other developers where necessary in order to ensure that the individual and cumulative highways impact on the City is mitigated. Detailed discussions have already taken place with CYC to agree the site-specific access solutions for the development proposals.	BDW/TWF will work alongside CYC and other developers where necessary in order to ensure that the individual and cumulative highways impact on the City is mitigated. Detailed discussions have already taken place with CYC to agree the site-specific access solutions for the development proposals.
4(viii)	Local Highways Upgrades	Appropriate contributions will be delivered for local highways upgrades linked to the development of the site. Land can also be made available for potential future widening of the A1237.	Appropriate contributions will be delivered for local highways upgrades linked to the development of the site. Land can also be made available for potential future widening of the A1237.	Appropriate contributions will be delivered for local highways upgrades linked to the development of the site. Land can also be made available for potential future widening of the A1237.
4(ix)	Dedicated Public Transport Routes	A bus route will be provided through the site, via the A1237 and Wigginton Road access points. Pedestrian/Cycle connections will be delivered to existing links via new proposed subway link to Clifton Moor at the request of CYC. The cost of which is circa £1.5m. Which provides further weight to the need to expand the size of the allocation to ensure that it remains viable.	A bus route will be provided through the site, via the A1237 and Wigginton Road access points. Pedestrian/Cycle connections will be delivered to existing links via new proposed subway link to Clifton Moor at the request of CYC. The cost of which is circa £1.5m. Which provides further weight to the need to expand the size of the allocation to ensure that it remains viable.	A bus route will be provided through the site, via the A1237 and Wigginton Road access points. Pedestrian/Cycle connections will be delivered to existing links via new proposed subway link to Clifton Moor at the request of CYC. The cost of which is circa £1.5m. Which provides further weight to the need to expand the size of the allocation to ensure that it remains viable.
4(ix)	Public Transport Services	Masterplan designed to accommodate a bus route through the site, via the A1237 and Wigginton Road access points. Discussions will take place with operators to ensure that the new route connects the site to the City and surrounding Villages.	Masterplan designed to accommodate a bus route through the site, via the A1237 and Wigginton Road access points. Discussions will take place with operators to ensure that the new route connects the site to the City and surrounding Villages.	Masterplan designed to accommodate a bus route through the site, via the A1237 and Wigginton Road access points. Discussions will take place with operators to ensure that the new route connects the site to the City and surrounding Villages.
4(x)	Pedestrian & Cycle Links	Provided throughout the site with connectivity to existing links and Clifton Moor via a new proposed subway.	Provided throughout the site with connectivity to existing links and Clifton Moor via a new proposed subway.	Provided throughout the site with connectivity to existing links and Clifton Moor via a new proposed subway.

4(xi)	Coalescence with Surrounding Settlements	Key views to York Minster are preserved. Positioning of open space on western boundary; substantial landscaping on all of the site's boundaries; and retention of existing woodland areas ensures delivery of permanent future boundaries to the site. Distance from the site's western boundary to Skelton is 1km; eastern boundary to Wigginton Road is 0.6km; and southern boundary to Clifton Moor is 0.46km	Key views to York Minster are preserved. Positioning of open space on western boundary; substantial landscaping on all of the site's boundaries; and retention of existing woodland areas ensures delivery of permanent future boundaries to the site. Distance from the site's western boundary to Skelton is 1km; eastern boundary to Wigginton Road is 0.6km; and southern boundary to Clifton Moor is 0.42km	Key views to York Minster are preserved. Positioning of open space on western boundary; substantial landscaping on all of the site's boundaries; and retention of existing woodland areas ensures delivery of permanent future boundaries to the site. Distance from the site's western boundary to Skelton is 1km; eastern boundary to Wigginton Road is 0.6km; and southern boundary to Clifton Moor is 0.25km
4(xii)	Protect/Enhance Green Assets	All of the site's existing green assets are sought to be maintained and enhanced where possible.	All of the site's existing green assets are sought to be maintained and enhanced where possible.	All of the site's existing green assets are sought to be maintained and enhanced where possible.
4(xiii)	Green Space on Western Boundary	16.52Ha of Open Space within the site and substantial areas of green space on the site's western boundary. Distance from the site's western boundary to Skelton is 1km.	Increased areas of 17.12Ha of Open Space within the site and substantial areas of green space on the site's western boundary. Distance from the site's western boundary to Skelton is 1km.	Significantly increased areas of 27.09ha of Open Space within the site, including substantial areas of green space adjacent to the site's western boundary. Distance from the site's western boundary to Skelton is 1km. Additional open space is also to be provided to the site's northern edge in order to provide a robust green wedge between the site and Moor Lane. It is envisaged that the open space in this location will be in the form of new accessible areas of woodland planting and also land available for the expansion of the existing cemetery.

The comparison provided in the table above establishes that BDW & TWF's development options will deliver CYC's key planning parameters as set out within the Pre-Publication Draft Consultation document.

In particular, the requirements to deliver a sustainable housing mix would also include an element of Built to Rent (BTR) to help increase the supply in the Private Rented Sector (PRS) which has been identified by Government as a significant element of the national housing need. Following the Montague Review in 2012 there have been a significant number of Government initiatives on BTR and the House of Commons briefing paper (June 2017) stated that *"the PRS is viewed as an essential part of a strong housing market; successive Governments have tried to create and promote a more professional PRS that is more attractive to tenants, developers and investors"*. The PRS can provide flexibility of tenure, mobility and opportunities for employees, including the Key Worker section. With regards to the Clifton Gate site, the provision of BTR will complement the more traditional housebuilder product that will be delivered across the majority of the site.

Though BDW & TWF support CYC's proposed allocation of the site, the evidence presented in the table above and the enclosed documentation, clearly demonstrates that the allocation boundary needs to be expanded in order to deliver a minimum of 1,350 homes at the site. This is in association with the delivery of a Garden Village design philosophy and the provision of substantial community infrastructure including a primary school, village centre and public open space and recreational facilities. Importantly, the increase in land area would not have an impact on coalescence with surrounding settlements as a **1km** separation distance would be retained between the site and Skelton; **0.6km** between the site and Wigginton Road; and **0.46km** between the site and Clifton Moor.

The distance between the site and Clifton Moor would reduce to a still significant **0.42km** if Option 2 was progressed, but the option would increase the open space within the proposals to **17.12ha**.

With regards to the new proposed Option 3, whilst this option would reduce the distance between the site and Clifton Moor to 0.25km (the site's least sensitive coalescence wedge), it would result in a significantly increased open space area of **27.09Ha**. Additional open spaces within this option would be provided to the site's northern edge in order to provide a robust green wedge between the site and Moor Lane. It is envisaged that the open space in this location will be in the form of new accessible areas of woodland planting and also land available for the expansion of the existing cemetery.

One further important factor that we would like to raise CYC's attention to is the net developable area proposed within each of the three above options. CYC's proposed allocation amounts to **1,348 homes within 55ha** of land in total. It is our understanding that this area predominantly relates to the residential areas of the site, with the provision of public open space and recreational facilities being located on the site's edges, as proposed within the Pre-Publication Draft Local Plan. We set out in the table above, and within the enclosed land use schedules for each of the three development options, that the net developable areas for the three proposed options are **1,350 homes within 42.32Ha** of land; **1,725 homes within 53.92Ha** of land; and **2,200 homes within 67.92ha** of land. The net developable areas of both Option 1 and Option 2 are of course lower than that prescribed by CYC. The gross areas of land associated with each of our client's development options are above the 55ha figure, however, the additional land areas include a primary school, nursery, village centre, public open spaces and recreational facilities, including allotments. The increase in land area is entirely associated with the creation of a Garden Village which benefits from substantial community infrastructure. Creating a new settlement where people will truly want to live.

The similarities between each of BDW & TWF's development options are clear. Whilst they all represent deliverable and viable development opportunities to deliver a significant proportion of the City's housing needs, the difference between the three options is associated with the increase in proposed residential dwellings and, of course, the proportionate economic and social benefits associated with the delivery of more homes from the site. The three proposed development options at the site can deliver the following economic and social benefits to the City of York: -

Socio-Economic Benefit	Option 1 1,350 Homes	Option 2 1,725 Homes	Option 3 2,200 Homes
Creating sustainable communities through meeting market and affordable housing needs, offering existing and potential residents of the City the opportunity to live in the type of house and location they desire	Including up to 405 Affordable Homes	Including up to 518 Affordable Homes	Including up to 660 Affordable Homes
Delivering significant financial contributions towards the improvement of the City's infrastructure including the provision of S106/CIL payments and land for the potential widening of the A1237 ring road in the future.	S106/CIL payments will increase proportionately for each Option		
New capital construction expenditure from private funding	£163m	£208m	£268m
Creation of substantial direct and indirect employment opportunities, including apprenticeships, of which 70% are usually retained in the local area.	361 Jobs	461 Jobs	579 Jobs
Sustaining and improving the District's labour market through delivering the right homes in the right locations.	Benefit will increase proportionately for each Option		
Increased retail and leisure expenditure in the local area per annum	£32m	£41m	£51m
Creation of additional jobs within the local retail and leisure sector	196 Jobs	250 Jobs	299 Jobs
Provision of funding towards public services from the Government's new homes bonuses	£12.4m	£15.8m	£19.2m
Provision of funding towards public services from annual Council tax payments	£2.07m	£2.6m	£3.2m
Provision of services including superfast broadband			

It is clear that all three of the proposed new Garden Village options for the Clifton Gate site can deliver substantial economic, social and environmental benefits to the local area and wider City.

The National Planning Policy Framework seeks to encourage sustainable growth and identifies in Paragraph 8 that economic growth, such as that which this site can deliver, can secure higher social and environmental standards. Furthermore, Paragraph 52 identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements that follow the principles of Garden Cities (or a Garden Village in this case).

Paragraph 52 of the Framework further states that in such circumstances local planning authorities should consider opportunities to provide the best way of achieving sustainable development. The remaining sections of this letter consider the economic, social and environmental impact and benefits of the proposed development options in further detail.

A NEW 21ST CENTURY YORKSHIRE GARDEN VILLAGE – PRESERVING THE CHARACTER AND SETTING OF YORK

A Vision Document, prepared jointly by JTP Architects and Turkington Martin Landscape Architects, is submitted alongside these representations. The document identifies the vision to deliver: -

A new village with its own identity and good local facilities to meet the everyday needs of residents as the community grows over time. A new village which is well-connected to the centre of York and surrounding settlements by sustainable modes of transport but clearly separated and screened from existing settlements to avoid coalescence. A place that feels a part of York but is still a separate place.

The vision for the site's development, as set out within the development masterplans which are enclosed within the document, has been prepared following a comprehensive assessment of the landscape character of the site and the surrounding areas.

One of the key characteristics of York is how the city developed out from its historic core in the form of radial corridors separated by a series of green fingers. The proposed site aligns with one of these

development corridors which extends radially outwards north-west of York City Centre. The proposed development sits between two green fingers, consisting of the Ouse Corridor to the west of the site, and Bootham Stray to the east. These green fingers positively contribute towards York's green infrastructure network, enhancing the amenity and biodiversity value of existing routes into the city centre and links nature conservation sites with other open space. They also preserve the notion of approaching the city through the countryside.

The Outer Ring Road currently demarcates the urban area of York from the surrounding Green Belt countryside. Where settlements are close to this road, there is a separation distance ranging between 60m and 400m. This has the appearance of reinforcing the village character which is distinct from suburban York. This can be seen in the relationship of villages such as Poppleton, Earswick and Haxby with the ring road and the city beyond. The proposal to set the new development back a distance between 250m and 460m from the outer Ring Road as proposed would establish a village character, provide a distinct identity of the development, and reinforce the separation from the edge of York.

The built edge of the new village will be 1 kilometre from Skelton in all three of the proposed development options. The village will also be well screened from the east by existing mature woodland and set away from Wigginton Road; preserving the rural character of the route into the city centre.

Screening is provided by existing plantations to the east and mature hedgerows adjacent to Bur Tree Dam to the west, with proposed planting further restricting views into the site. The extent of screening landscape elements will result in distant glimpsed views into the new village centre from Wigginton Road, minimising visual impact on adjacent green corridors.

Existing fragmented woodland will be linked and strengthened with new tree planting, green spaces and sports pitches. A series of linked green spaces will encircle the village, providing recreation for the new community and ensuring a green buffer from Clifton Moor and a low density edge from the surrounding countryside. Sport pitches and school playing fields will be located on the site's western boundary, to deliver active uses adjacent to the wider open countryside.

A new village centre with a cluster of local facilities around an attractive village square with a pond will provide a focus for the new village. The square will accommodate seasonal markets and events. There will also be a new pedestrian/cycle subway link to Clifton Moor shopping centre. Small scale workshops, a health centre and older people's housing is also proposed.

Existing water features including ponds and streams will be incorporated into the new village layout. New water features relating to the Suds systems will also be added. These features will together form an integral aspect of the new streets and open spaces adding character and drawing on precedents from surrounding villages.

Linear green spaces will run through the residential area and incorporate watercourses and existing hedgerows. These linking green spaces will create a network of pedestrian routes through the site and define individual neighbourhoods within the new development. They will accommodate a range of community and recreational facilities such as play areas and allotments. Importantly, the green corridors which run through the site have been positioned in order to preserve views of York Minster.

With regard to the proposed Option 3, additional open space is also to be provided to the site's northern edge in order to provide a robust green wedge between the site and Moor Lane. It is envisaged that the open space in this location will be in the form of new accessible areas of woodland planting and also land available for the expansion of the existing cemetery.

The developers of the site will seek to work alongside *Treemendous York* to aid their objective of planting 50,000 new trees within the City in order to promote a healthier, greener, more environmentally friendly, successful and beautiful city.

On account of the above we agree with CYC's conclusion that the site does not fulfil any of the five Green Belt purposes for the following reasons: -

- **The development of the site would not result in unrestricted urban sprawl** due to the masterplan vision of delivering a landscape character led new garden village that delivers new strong defensible landscape and greenspace boundaries;
- **The development of the site would not result in the merging of adjacent settlements** as the positioning of open space on the western boundary; substantial landscaping on all of the site's boundaries; and retention of existing woodland areas ensures delivery of permanent future boundaries to the site which are a distance of 1km from Skelton; 0.6km from Wigginton Road; and between 0.25km and 0.46km from Clifton Moor;
- **The site does not assist in safeguarding the countryside from encroachment** on account of the significant areas of open countryside that will remain surrounding the site, particularly to the north;
- **The proposed development of the site will have no detrimental effect on the setting and special character of historic features** as an assessment has been undertaken of the historic setting of York Minster and the masterplan options have been designed to preserve and where possible enhance the heritage assets within proximity of the site. Importantly, the proposed green corridors which run through the site have been positioned in order to preserve views of York Minster.
- The fifth purpose of Green Belt **to assist in urban regeneration, by encouraging the recycling of derelict and other urban land** is a general purpose which will not be adversely affected by the site.

SAFEGUARDING HISTORIC CHARACTER

Enclosed with these representations is an Archaeology Statement prepared by York Archaeological Trust (YAT). The enclosed statement is based on the YAT's archaeological investigations conducted in 2014. The area currently proposed for residential use was previously investigated with 48 trenches and 4 boreholes. The area identified for open space was investigated with 6 trenches. The area identified for SUDS use was investigated with 7 trenches and 6 boreholes.

The enclosed statement identifies that the site's archaeology has been affected by ploughing and extensive drainage systems across the site. YAT's opinion, supported by the City of York Archaeologist, is that there are no features or deposits identified in the evaluation exercise whose significance merits preservation in-situ. The archaeology present within the proposal site has the potential to enhance understanding of York's prehistory. The City of York Archaeologist has previously suggested that the impact of the development on this archaeology can be mitigated through an archaeological excavation and recording exercise. The City Archaeologist has also indicated that no further evaluation is necessary to inform an EIA, but it may be prudent to consider further evaluation in both the 'areas of interest' and the areas currently regarded as containing little archaeology in order to manage cost and programme risk.

Finally, there are opportunities for community engagement and outreach, both through direct involvement with archaeological work and through public lectures/press releases and publication. BDW & TWF would welcome further discussion with CYC to explore this potential.

DELIVERING A SUSTAINABLE & ACCESSIBLE SETTLEMENT

Enclosed with these representations is an Outline Transport Strategy Report prepared by Fore Consulting Limited (Fore). The document has been prepared to guide the promotion of the Clifton Gate site. It considers the strategic access and connectivity implications associated with development of up to 1,725 dwellings, and identifies a potential outline transport strategy. Whilst the document considers a development of up to 1,725 homes at the site, it is considered that the transport strategy identified within the statement can be upgraded to ensure an accessible and sustainable development of up to 2,200 homes at the site.

The report identifies that the site is well located in relation to the existing wide range of retail and leisure uses within and adjacent to the Clifton Moor retail parks, plus employment uses at Clifton Moor industrial estate and business park. To ensure the long-term sustainability of the site, high quality, safe and convenient walking and cycling routes permeating through the allocation site will be required. These would link to new crossings on the A1237 Outer Ring Road adjacent the allocation site, and new footways and cycleways to link to the existing network of pedestrian and cycle routes linking to the city centre. To ensure permeability with surrounding areas a bus route will be provided through the site, via the A1237 and Wigginton Road access points, and pedestrian/cycle connections will be delivered to existing connections including a new subway under the A1237 Outer Ring Road proposed to link the site to Clifton Moor.

Vehicle access would be taken from a new junction on the B1363 Wigginton Road, and a fourth arm at the A1237 Outer Ring Road / Clifton Moor Gate roundabout. Changes to the Clifton Moor Gate junction in particular will need to be carefully considered to take account of CYC's long-term aspirations to upgrade the A1237 Outer Ring Road, and potentially incorporate grade separation of pedestrian and cycle connections. As identified above, the development of the site offers the potential to make land available for the potential future widening of the A1237.

The proposals will also encourage green transport options in the form of car sharing and vehicle charging points.

The report concludes by stating that the precise impacts, scale, form and phasing of necessary transport measures and highway works will need to be confirmed following collection of traffic data and detailed capacity assessment work that will be undertaken at the planning application stage. However, overall, it is considered that there is no reason in terms of transport and access that precludes the ST14 site from being allocated for residential use.

SAFEGUARDING BIODIVERSITY

Enclosed with these representations is an Ecology Statement prepared by Baker Consultants. The statement outlines the results of a number of ecological studies carried out at the site in 2013-2014 in order to provide an understanding of the ecological issues related to the proposed allocation. The likely ecological constraints to the allocation are also described, as are any requirements for additional survey work. Potential mitigation solutions as part of the planning and development process are also highlighted.

The enclosed report identifies that the following flora and fauna surveys have been undertaken at the Clifton Gate site: -

- Badger Surveys – November 2013;
- Winter Bird Surveys - 4 visits in November & December 2013 and January & February 2014
- Breeding Bird Surveys - Three surveys in April, May and June 2014
- Botanical survey of the Clifton Airfield SLI – May 2014
- Invertebrate survey of Clifton Airfield SLI - Two visits September 2014
- Barn owl surveys - April/May 2014
- Great crested newt surveys - Surveys during mid-March to mid-June 2014
- Reptiles surveys - Surveys during April & May 2014
- Bat activity transects & static detector installation - Three transects undertaken on and around the allocation site during April-July 2014. Static detectors placed on and around the site between April-September 2014

The results of the assessments identify that the Clifton Gate site provides habitats typical of lowland arable farmland, and the species associated with this type of landscape. Although there are features of nature conservation interest present within the allocation site (and surrounding it), these are mostly in discrete areas of habitat rather than being present across the whole landscape.

The main habitat present – arable land – is of low nature conservation interest. The areas of hedgerow, woodland, and scrub are of greater interest and, due to their smaller size can be more easily incorporated into a residential development (and enhanced) as part of retained areas, landscaping and green infrastructure.

In terms of protected and notable species, great crested newts are known to be present locally, but are found in ponds outside of the original larger allocation site. Bats and badgers are known to make some use of the site, but due to the dominance of the arable habitat, the levels of activity and population sizes within the area as a whole are expected to be low. A range of breeding and wintering birds is also present – but principally in defined areas of suitable habitat.

None of the ecological features outlined in this report are likely to represent a serious constraint to the development of the site. Appropriate site design and mitigation will be required, as for any project of this size – but the most adverse potential impact, habitat loss, is extremely limited due to the dominant existing arable land-use.

Careful scheme design means that a range of hedgerow, woodland and other ecological features will be retained and incorporated into the development and, in some cases, enhanced. For example, the proposed access road to the south passes through Clifton Airfield SLI, but makes use of an existing trackway to minimise any potential for ecological impacts.

The proposed variation in the number of residential units (1,350; 1,750; or 2,200) is unlikely to make any significant difference to the level of ecological impact at the site. With any of the three schemes, areas of valuable habitat will be able to be retained and suitable mitigation and enhancement provided. More important will be the suitable incorporation of ecological design principles into masterplanning and detailed site layouts, appropriate protection measures during construction, and the long-term landscape and ecological management of the site post-construction. This can be equally well delivered within any of the three options proposed.

With regard to the proposed Option 3, additional open space is also to be provided to the site's northern edge in order to provide a robust green wedge between the site and Moor Lane. It is envisaged that the open space in this location will be in the form of new accessible areas of woodland planting and also land available for the expansion of the existing cemetery.

The developers of the site will seek to work alongside *Tremendous York* to aid their objective of planting 50,000 new trees within the City in order to promote a healthier, greener, more environmentally friendly, successful and beautiful city.

The statement concludes that although there are issues that would need to be dealt with during planning and construction of the site, these are reasonably standard for a development of this size and would be covered as part of the normal planning process. There is no significant ecological reason why the site should not be allocated for residential development for up to 2,200 homes if required.

DELIVERING NEW INFRASTRUCTURE

Enclosed with these representations is a Utilities Statement prepared by Arup, which provides an update on the assessment work which they previously undertook in 2014 in respect of the larger site allocation for circa 2,800 homes. The statement assesses likely implications of the proposed change in the size of the site and the quantum of development on Air Quality, Noise and Vibration, Flood Risk and Drainage, Geotechnical and Utilities.

The statement concludes by identifying that, based on the Environmental Statement work prepared in 2014, the site area can support a development of 1350 dwellings; 1725 dwellings; or 2,200 dwellings. The likely impacts of the development option would need to be validated through an updated Environmental Statement, however, the environmental effect of the development of a smaller site would of course be reduced compared to the previous 2,800 home development proposals.

The required mitigation to deliver any of the masterplan options can be provided within the site areas shown. To provide flexibility for the future approach to surface water management it would be beneficial to include additional land to provide SUDs ponds on the site's boundaries. The exact areas would be developed further through an updated Surface Water Strategy in due course, but additional land within the allocation would allow space for onsite surface water management.

MEETING THE CITY OF YORK'S FUTURE HOUSING NEEDS

As identified above, we believe that there is a case for the identification of additional housing allocations to those currently proposed by CYC in order to meet the City's housing needs over the proposed plan period.

BDW have previously instructed Barton Willmore to undertake a Technical Review of the Council's SHMA and the SHMA addendum, which was prepared by GL Hearn in June 2016, to assess the Council's methodology that has been utilised in formulating the objectively assessed need (OAN).

At present the Council have decided to progress with a housing target which is based solely on the baseline figure which is derived from the ONS 2014-based sub-national household projections and does not include the 10% uplift for market signals which is advised within the Council's latest SHMA.

By omitting the 10% uplift, and not progressing with a housing requirement of 953 dwellings per annum, the Council are failing to meet their full OAN, as required by the Framework and the Planning Practice Guidance (PPG). There are considered to be no overarching constraints within the District that justify the Council not delivering their full OAN. This approach fails to meet any of the tests of soundness set out in paragraph 182 of the Framework as the Local Plan is not positively prepared; justified; effective and consistent with national policy.

No evidence has been provided by the Council to justify the removal of the SHMA's proposed 10% uplift for market signals and it is assumed that this has been viewed as a way of reducing the overall housing target. This is unacceptable and is not a sound and robust means of preparing a Local Plan.

The Government's recent consultation document "*Planning for the Right Homes in the Right Places*" (September 2017) identifies a proposed standardised methodology for the calculation of the baseline OAN for each of the Country's Local Authority areas. Importantly, the guidance identifies in Table 1 on Page 22 of the document that in the circumstance when a Local Authority's Local Plan has not progressed to the submission of the Local Plan by the 31st March 2018 then the proposed standardised methodology should be utilised.

The Government's proposed standardised methodology includes for an uplift for market signals over and above the baseline figure and in the specific case of York, would lead to a housing requirement of 1,070 dwellings per annum. Although the methodology is subject to consultation and therefore carries limited weight at this time, it provides an indication as to how the Government considers housing requirements should be calculated, and the consideration of market signals is a key issue.

Barton Willmore's own Technical Review of the Council's SHMA as part of their "*Open House*" OAN model work, concluded that when a Market Signals Uplift is included, the full objectively assessed need is considered to range between 920 dwellings per annum and 1,070 dwellings per annum. The higher end of Barton Willmore's threshold therefore directly aligns with the figure that is generated when utilising the Government's standardised OAN methodology.

The Council are now in a position where their own evidence; Barton Willmore's Open House work; and the Government's proposed standardised methodology, all state that an uplift for market signals should be added to the baseline figure, and all of which indicate that the true full OAN is greater than the 867 dwellings per annum which is being proposed.

Therefore, in order to make the plan sound, the housing figure should be adjusted upwards to consider market signals. This in turn will require additional sites to be allocated for residential development.

Our clients are also concerned with the approach taken by CYC with regard to the delivery of windfall development throughout the plan period, which currently stands at 169 dwellings per annum or approximately 19% of the City's overall annual housing requirement. Such a reliance on unplanned development is contrary to the legislative provision of a plan-led system and should not form the basis of the CYC Local Plan moving forwards. Such an approach will not direct homes to those areas that have seen limited growth over recent years and have a clear need for new homes in the future. It is also highly likely that no affordable housing will be provided on windfall sites located in the Urban Area on account of the 15-dwelling threshold proposed in draft Policy H10.

There are also concerns associated with the deliverability of the York Central and Barrack sites. In respect of York Central this relates to uncertainties over the timescales associated with the site's initial infrastructure works and the final quantum of new homes that can be delivered at the site. With regard to the Barrack sites, the concerns relate to *when* and *if* both of the sites will become available for development within the plan period. Unless these current uncertainties are resolved, it is our view that the quantum of new homes to be delivered at these sites should be considered over and above the identification of housing allocations to meet the City's housing needs. If not, there is a real possibility that the City could fail to demonstrate the delivery of sufficient number of deliverable housing sites to meet the City's housing requirement.

Finally, the Pre-Publication Draft Local Plan is relatively silent in respect of the provision of Safeguarded Land and the role this plays in ensuring long term permanence to the Green Belt. Paragraph 85 of the Framework identifies that where necessary LPA's need to plan for longer term development needs "*stretching well beyond the plan period*" through the designation of Safeguarded Land. There are varying examples within recently approved Development Plan documents of what a timescale of "*well beyond the plan period*" can equate to which differ between an additional 10% of land allocations; an additional 5 years' worth of land; or in some cases 10 years' worth of land. It could be argued the greater amount of safeguarded land identified, the greater permanence can be provided to the Green Belt.

In respect of the Clifton Gate site, we support the Council's approach that the larger strategic site allocations will contribute to delivering long term Green Belt permanence where they will deliver homes beyond the initial plan period. An increase of the Clifton Gate site to 2,200 new homes in size as proposed within these representations would make an additional valuable contribution towards providing enduring Green Belt boundaries for the City well beyond the plan period.

In conclusion, when each of the above points are considered holistically, there is a compelling case for the release of additional land as housing allocations within the emerging CYC Local Plan in order to meet the City's full objectively assessed housing needs, such as an extension of our client's Clifton Gate site to deliver at least 1,725 homes.

HOUSING INFRASTRUCTURE FUND BID – SEPTEMBER 2017

CYC recently submitted a Housing Infrastructure Fund (HIF) bid to the Government with the aim of accelerating the delivery of new homes from the site within the plan period.

The Council's bid requested £9.845m funding towards the provision of the site's initial highways infrastructure in order to accelerate the delivery of homes at the site, providing an additional 280 homes on site by 2022/2023 and the delivery of all 1,350 homes by 2028/2029.

The HIF funding would enable the delivery of both of the two proposed access points for the site at commencement of development, meaning that the site's delivery will be developed by four separate house builder outlets immediately. Without the requested funding from the HIF only one access point would be delivered on account of cash flow/return on capital expenditure matters, resulting in the commencement of development from two house builder outlets for the first few years.

At present it is anticipated that the development will deliver a yield of at least 120 homes per annum with the potential to deliver up to 150 homes per annum. However, should CYC's HIF bid be successful, this could potentially deliver up to 200 homes in the early stages of the development on account of latent demand and four house builders developing from the site immediately.

The proposed community infrastructure and areas of public open space will be delivered commensurate with the progression of the development and made available for use as required. Meaning the accelerated housing deliver would also deliver the development's community infrastructure (Primary Schools, Village Centre, Health Centre, Elderly Care Homes) much quicker as well.

On account of the substantial initial site infrastructure requirements and costs, the delivery of new homes from the site will not reach its maximum potential for a 2 to 3-year period. Accordingly, the requested funding will enable the acceleration of housing delivery within the first year of the receipt of planning permission.

Should the Council's HIF bid be successful our client's Development Options 2 & 3 would clearly become fully deliverable within the proposed plan period. Which along with the evidence provided above in respect of housing needs and safeguarded land, provides a further planning argument associated with the allocation of our client's larger development options for the site.

DELIVERY TIMESCALES

We envisage that a planning application will be submitted in 2019, following the adoption of the Local Plan. Taking into account the proposed submission date it is currently envisaged that first dwelling completions on the site will take place in 2019/20 following the submission of a hybrid planning application and initial site infrastructure works.

The potential size of the site offers the opportunity for three to four house builders developing the scheme simultaneously. Therefore, it is anticipated that the development will deliver a yield of at least 120 homes per annum with the potential to deliver up to 150 homes per annum. The table below provides the site's cumulative dwelling delivery projection per annum that CYC can use within their forthcoming housing trajectory work. A delivery projection is provided for each of the potential Development Options for the site.

Year	Development Option 1 - No of Homes Cumulative	Development Option 2 - No of Homes Cumulative	Development Option 3 - No of Homes Cumulative
2018/2019	0	0	0
2019/2020	60	60	60
2020/2021	180	180	180
2021/2022	300	300	300
2022/2023	420	420	420
2023/2024	540	540	540
2024/2025	660	660	660
2025/2026	780	780	780
2026/2027	900	900	900
2027/2028	1,020	1,020	1,020
2028/2029	1,140	1,140	1,140
2029/2030	1,260	1,260	1,260
2030/2031	1,350	1,350	1,350
2031/2032		1,470	1,470
2032/2033		1,590	1,590
2033/2034		1,725	1,710
2034/2035			1,830
2035/2036			1,950
2036/2037			2,070
2038/2039			2,200
2039/2040			

N.B Delivery within the early years of the development could be greatly enhanced by the provision of additional care home facilities before 2020/2021 and Build for Rent before 2022/2023. With regard to proposed Option 3, this would result in the delivery of 2,200 homes entirely within the plan period.

The proposed community infrastructure and areas of public open space will be delivered commensurate with the progression of the development and made available for use as required.

The development proposals can deliver significant benefits to the City of York alongside making a significant contribution to CYC's housing requirements over the course of the plan period. In reference to CYC's Pre-Publication Draft consultation document, it is prudent to identify that the site has the potential to deliver at least 1,350 to 1,725 homes over the anticipated plan period.

Whilst the proposed Option 3 would deliver an additional 490 homes within the first four years beyond the plan period, we would like to point out the benefit that this would deliver to CYC in respect of meeting ongoing housing needs and also safeguarding the release of land from the newly defined Green Belt boundary in advance of the adoption of the next Local Plan.

Furthermore, the housing delivery rates identified within the table above are based on an annual delivery rate of 120 homes per annum. This figure could easily increase to 150 homes per annum in years of peak delivery. Further accelerated delivery above this figure can also be predicted should CYC's Housing Infrastructure Fund bid for the site prove successful.

DELIVERABILITY ASSESSMENT

In accordance with Footnote 11 of Paragraph 47 of the National Planning Policy Framework, we believe that the site can be considered as a **Deliverable** residential development site on account of: -

Suitability

The site is located in a suitable location for residential development now. As identified above, the development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services and there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

Availability

The site is available for development now. The site is available for residential development as there are no legal or ownership constraints as all landowners have made the land available for development. BDW & TWF have an interest in the site and by virtue of this and previous submissions are expressing an intention to develop the site for residential use.

Achievability

A viable housing development can be delivered on the site within the next five years and indeed within the first five years of the adoption of the Local Plan. BDW & TWF are seeking to develop the site for residential use. Prior to the progression of development sites, they undertake a thorough marketing and economic viability assessment for each site, including an assessment of any site specific abnormal costs. The site is considered to be achievable for residential development now as there is a realistic prospect that the site can deliver new homes within the next five years and indeed within the first five years of the adoption of the Local Plan.

Deliverability Conclusion

The site can be considered a deliverable residential development site and its release would deliver a number of significant economic, social and environmental benefits as identified above.

CONCLUSIONS

On the basis of the information provided within this letter, and the enclosed documentation, we wish to place on record our **support** for the proposed allocation of Land to the West of Wigginton Road which is currently proposed by CYC as a new Garden Village within the emerging City of York Local Plan.

Whilst we support the principles of the allocation of the site, we believe that amendments are required to the site's proposed boundaries in order to ensure that CYC's Garden Village philosophy for the site can be delivered alongside each of CYC's identified Planning Parameters.

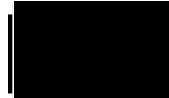
Our proposals have the potential to provide a new Garden Village of either 1,350 homes; 1,725 homes; or 2,200 homes alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities. The site is strategically located to the north of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible.

The development proposals are situated in a **suitable** and highly sustainable location and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. The site is **available** now as it is under the control of a national house builder and regional development company who are actively seeking to secure planning permission for the residential development of the site. The site can also be considered **achievable** as our clients can deliver new homes on the site within the next five years.

Finally, in respect of procedural matters, we would like to work alongside CYC to finalise the site specific strategic development policy to be included within future versions of the Local Plan. Working together we can ensure that CYC's and the local community's planning parameters for the site are deliverable.

Should you require any further details or clarification on the content of this letter please do not hesitate to contact me.

Yours sincerely,

A black rectangular box redacting the signature of Paul Butler.

PAUL BUTLER

Director

paul.butler@pbplanning.co.uk

Local Plan,
City of York Council,
West Offices,
Station Rise,
York,
YO1 6GA

4th April 2018

Dear Sir or Madam,

CITY OF YORK LOCAL PLAN – LAND WEST OF WIGGINTON ROAD – BARRATT HOMES & DAVID WILSON HOMES AND TW FIELDS – CLIFTON GATE - SUPPORT FOR SITE REFERENCE ST14

We write on behalf of our clients Barratt Homes & David Wilson Homes (BDW) and TW Fields (TWF) to provide City of York Council (CYC) with their representations to CYC's Publication Draft Local Plan (February 2018).

From a review of the latest version of the Local Plan, it is clear that CYC have not taken on board the evidence we previously presented in our representations to earlier versions of the Local Plan, by letters dated 12th September 2016 and 27th October 2017. As a result, we are concerned that the current Publication Draft Local Plan cannot be considered sound in the context of Paragraph 182 of the NPPF.

This letter does not seek to re-iterate the comments made to CYC in our previously submitted representations. These are enclosed, and we request that they are submitted alongside this letter to the Secretary of State as a holistic and comprehensive representation for the Land to the West of Wigginton Road (Site Ref. ST14), which we refer to as Clifton Gate.

This letter will however provide a summary of the comments previously made, before providing an update in our response to CYC's evidence base in association with the deliverability of this site and the objectively assessed housing needs of the City.

Our client's **support** CYC's identification of the site as a new Garden Village within the emerging City of York Local Plan. However, we wish to make it clear from the outset that we have concerns with the current red line site allocation boundary.

Whilst the site can deliver 1,348 homes within the plan period within CYC's current site red line site allocation boundary, it is our view that the current boundary should be expanded in order to enhance the community and green infrastructure that the site can deliver in respect of the policy aspirations required by Policy SS12 of the Publication Draft Local Plan.

Furthermore, when considering the need to expand the current red line site allocation boundary for the site, CYC must also recognise that the site area we are proposing for our 1,350 development option mirrors that which CYC submitted to the Government as part of their successful Housing Infrastructure Fund bid (subject to submitting a sound business case) in September 2017. Which of course seeks funding to accelerate the delivery of new homes at the site. Consequently, in order for CYC to fulfil the requirements necessary to obtain the funding provisionally allocated, the site allocation boundary needs to be expanded to ensure that the site's area identified within the Housing Infrastructure Fund bid and the Local Plan align.

We therefore request that CYC amend the red line site allocation boundary prior to the submission of the Local Plan to the Secretary of State in order to ensure that the Local Plan can be found sound. From a delivery point of view, this will also allow us to prepare and submit a planning application prior to the adoption of the Local Plan, which could then be determined shortly after the Local Plan's adoption. Thus, ensuring the delivery of new homes from the site at the earliest point possible.

CLIFTON GATE – SUMMARY & DEVELOPMENT OPTIONS

A summary of our previous representations is provided in the table below: -

Site ST14 – Representations Summary
<ul style="list-style-type: none"> • We fully support the principle of the proposed allocation of the site by CYC. • Three deliverable and viable development proposals are being put forward for CYC’s consideration: <ul style="list-style-type: none"> ○ The delivery of 1,350 homes (including 405 affordable homes) at the site alongside each of CYC’s proposed “Planning Principles”. ○ The delivery of 1,725 homes (including 517 affordable homes) at the site to meet any potential increase in the City’s housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site. ○ The delivery of up to 2,200 homes (including 660 affordable homes) at the site to meet any potential increase in the City’s housing requirements or the need to ensure permanence to the City’s Green Belt, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site. • The development proposals can deliver 420 homes within the first 5 years of the Local Plan and up to 1,725 homes (at least) within the plan period. The number of homes to be delivered at the site would be accelerated should CYC’s Housing Infrastructure Fund bid be successful. • The proposals will deliver a Garden Village design philosophy with the provision of substantial community infrastructure including a primary school, village centre, public open space and recreational facilities. • The net developable residential area of each of the proposed options are either smaller or similar in size to the current allocation site area prescribed by CYC. • In each of the development options above, the historic and landscape character of this area of the City will be preserved as key views to York Minster are maintained and strategically placed open space on the site’s boundaries alongside the site’s existing woodland areas will deliver permanent future boundaries to the site. • Separation distances between the site and surrounding areas are substantial. The distance between the site’s western boundary to Skelton is 1km; its eastern boundary to Wigginton Road is 0.6km (both of these separation distances remain for all site options; and its southern boundary to Clifton Moor is between 0.25km and 0.46km (depending on which site option is progressed). • Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south). Appropriate contributions will be delivered for highways upgrades. Land can also be made available for the potential future widening of the A1237. • Pedestrian and cycle connections will be provided throughout the site, with connectivity to existing links and Clifton Moor via a proposed subway under the future upgraded A1237. • The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

The site is strategically located to the north of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services at Clifton Moor. Importantly, there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

Whilst the introduction of this letter focused on the need for CYC to expand the red line site allocation boundary to ensure the delivery of a 1,350 home Garden Village at the site, the site has the potential to provide for a new garden village of either 1,350; 1,725; or up to 2,200 new homes, alongside the

delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities.

The site has been identified as strategic housing site allocation ST14 within iterations of the City of York Local Plan since June 2013. At that time the Preferred Options Local Plan identified the site as having the potential to deliver 4,020 homes, along with the allocation of Safeguarded Land to the north of the allocation. The number of homes to be provided at the site was reduced to 2,800, along with an amendment to the red line site allocation boundary, within the now withdrawn City of York Publication Draft Local Plan (October 2014).

None of the proposed options for Clifton Gate are within the *York Green Belt Appraisal Character Areas* as set out in Figure 3.1 of the council's Publication Draft Local Plan

Prior to the withdrawal of the previous Publication Draft Local Plan, our clients undertook and submitted technical assessments associated with the delivery of the previously proposed red line site allocation boundary. Comprehensive community consultation work with local stakeholders, including a Community Planning Weekend, was also undertaken in respect of the larger site area.

Consequently, as CYC have previously undertaken public consultation and Sustainability Appraisal work in respect of the larger site, there remains the potential for the enlargement of the allocation back to the previously considered acceptable size, should CYC need to do so to meet the City's increased housing needs.

This letter reiterates our client's design philosophy for the proposed development of a 21st Century Garden Village at the Clifton Gate site and demonstrates the site's deliverability for residential development in accordance with national planning guidance. In doing so the letter again refers to the following documents which are enclosed: -

- Visual Document – JTP/Turkington – August 2016
- Illustrative Masterplan – JTP – August 2016
- 1,350 Home Land Use Plan; Land Use Schedule & Key – JTP – August 2016
- 1,725 Home Land Use Plan; Land Use Schedule & Key – JTP – August 2016
- 2,200 Home Land Use Plan; Land Use Schedule & Key – JTP – October 2017
- Archaeology Statement - York Archaeological Trust – August 2016
- Outline Transport Strategy Report – Fore Consulting – September 2016
- Ecology Statement – Baker Consulting – September 2016
- Utilities Statement – Arup – September 2016

The documents referenced above provide an update of the comprehensive technical reports which were previously submitted to CYC in the promotion of the original larger site area proposed for allocation by CYC within the withdrawn City of York Publication Draft Local Plan (October 2014). The parameters established within the comprehensive technical reports were utilised in the preparation of the new indicative masterplans for the site.

With regards to our proposed Option 2, which recommends the delivery of 1,725 homes at the site, in order to meet an evidenced increase to the City's housing requirements, CYC's Officer's endorsed an increase in the proposed site allocation from 55ha (1,348 homes) to 68ha (1,672 homes) to CYC's Local Plan Working Group on the 10th July 2017. The reasoning behind the recommendation was as follows:

“This reflects developers/landowners concerns regarding the viability/deliverability of the site and the ability to deliver the planning principles including the significant infrastructure requirements given the sites location adjacent to the A1237.”

This option was also put forward by CYC's Officer's as a potential change to the Local Plan ahead of consultation in respect of the Publication Draft Local Plan at CYC's Local Plan Working Group on the 23rd January 2018.

Whilst CYC's Officer's recommendations were not approved on either occasion, we believe there is still a strong case for the expansion of the site in respect of both size and housing numbers. Whilst we support CYC's Officer's recommendation, it remains our view that in order to deliver a truly exemplar new Garden Village, the site allocation should be expanded to at least *"72.73Ha in total and 1,725 homes (at 32dph on 53.96ha net residential developable area)"* for the reasons identified within this and our previous representations; the reasoning provided by CYC's Officers; and due to the potential need to deliver additional homes from the site to meet the increased housing needs of the City.

With regard to our proposed Option 3, the 2,200 home opportunity for the development of the site was previously put forward for CYC's consideration on account of the potential need for additional housing numbers as result of the Government's recent announcement associated with a standardised methodology for calculating annual housing requirements; the need for CYC to ensure enduring and permanent Green Belt boundaries beyond the plan period; and as a result of CYC's recent Housing Infrastructure Fund bid to the Government, which could result in an accelerated delivery of new homes at the site.

Notwithstanding the above, we believe that it is of paramount importance that in the first instance CYC ensure that the site allocation red line boundary for their proposed number of homes (1,348) is correct to ensure the delivery of a Garden Village style development alongside the comprehensive delivery of CYC's community and green infrastructure aspirations for the site as required by Policy SS12 of the Publication Draft Local Plan.

As identified above, there are three potential masterplan options associated with the development of the site: -

1. The delivery of 1,350 homes at the site to align with CYC's proposed housing numbers within the Publication Draft Local Plan Document. This masterplan option represents a deliverable and viable opportunity to meet CYC's current proposed housing numbers for the site, whilst also ensuring that each of CYC's proposed "Planning Principles" are delivered.
2. The delivery of 1,725 homes at the site to meet any potential increase in the City's housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC's proposed "Planning Principles" for the site. This option could also deliver an increase in economic and social benefits associated with the delivery of more homes at the site.
3. The delivery of up to 2,200 homes at the site to meet any potential increase in the City's housing requirements or the need to ensure permanence to the City's Green Belt, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC's proposed "Planning Principles" for the site.

The vision of the proposals is to deliver a landscape led development which is separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The proposed development options have been formulated following the undertaking of ecology, landscape, Green Belt, archaeology, drainage, infrastructure and highways assessments. Each of the proposals seek to deliver a Garden Village development, community facilities and substantial areas of recreation and amenity space.

With our previous representations we provided an assessment of each of the development options against each of CYC's policy parameters identified within draft Local Plan Policy SS12. For brevity, we do not seek to repeat this assessment here and again ask that CYC refer to our previous submissions which are enclosed with this letter.

However, in order to reaffirm our point in respect of the need to expand the current proposed red line site allocation boundary, we provide in the table below an analysis of the amount of land that would be available for community and green infrastructure within CYC's current site allocation red line boundary and each of our development options.

Ref.	CYC	Option 1	Option 2	Option 3
Site Size / Capacity	55Ha / 1,348 Homes (1200 plan period)	65.36Ha / 1,348 Homes (All within the plan period)	77.56Ha / 1,725 Homes (All within the plan period)	101.53Ha / 2,200 Homes (Potential for up to 2,200 homes within the plan period)
Density / Design Ethos	Strategic Site – 70% net site area at 35dph	Garden Village – Approximately 60% to 70% net developable area – 42.32Ha net site area at 32dph	Garden Village – Approximately 60% to 70% net developable area - 53.92Ha net site area at 32dph	Garden Village – Approximately 60% to 70% net developable area - 67.92Ha net site area at 32dph
Additional Land Uses / Analysis	<p>A density of 35 dph over the net developable area would result in a development that is similar in density to those currently taking place within the main urban areas of the City i.e. Redrow’s scheme at the Grain Stores; Persimmon’s scheme at Germany Beck and BDW’s scheme at New Lane, Huntington.</p> <p>It does not allow for space/planting between dwellings or further green wedges/planting throughout the street scene. Which is what a Garden Village ethos requires and is more aligned to a density of 32dph and a net developable area of 60% to 70%.</p> <p>At 32 dph over a 60% developable area, 1,056 homes could be delivered. This increases to 1,232 homes over a 70% new developable area.</p> <p>Increasing this to 1348 homes within the current proposed site area would therefore result in a reduction of the land available for the delivery of all of the other essential and desirable uses such as a new primary school, local centre, recreational open space and SuDS features.</p>	<p>The option can deliver: -</p> <ul style="list-style-type: none"> • 1,348 homes at 32dph • 2.3Ha of land for a Local Centre. • 2.26Ha of land provided for Nursery and a two-form entry Primary Education. • 16.52Ha of Open Space within the site and substantial areas of green space on the site’s western boundary. Distance from the site’s western boundary to Skelton is 1km. 	<p>The option can deliver: -</p> <ul style="list-style-type: none"> • 1,725 homes at 32dph • 2.3Ha of land for a Local Centre • 2.26Ha of land provided for Nursery and a two-form entry Primary Education. • 17.12Ha of Open Space within the site and substantial areas of green space on the site’s western boundary. Distance from the site’s western boundary to Skelton is 1km. 	<p>The option can deliver: -</p> <ul style="list-style-type: none"> • 2,200 homes at 32dph • 2.3Ha of land for a Local Centre • 2.26Ha of land provided for Nursery and a two-form entry Primary Education. • Substantially increased areas 27.09Ha of Open Space within the site and substantial areas of green space on the site’s western boundary. Distance from the site’s western boundary to Skelton is 1km. Additional open space is also to be provided to the site’s northern edge in order to provide a robust green wedge between the site and Moor Lane. It is envisaged that the open space in this location will be in the form of new accessible areas of woodland planting and also land available for the expansion of the existing cemetery.

The similarities between each of BDW & TWF's development options are clear. Whilst they all represent deliverable and viable development opportunities to deliver a significant proportion of the City's housing needs, the difference between the three options is associated with the increase in proposed residential dwellings and, of course, the proportionate economic and social benefits associated with the delivery of more homes from the site.

The three proposed development options at the site can deliver the following economic and social benefits to the City of York: -

Socio-Economic Benefit	Option 1 1,350 Homes	Option 2 1,725 Homes	Option 3 2,200 Homes
Creating sustainable communities through meeting market and affordable housing needs, offering existing and potential residents of the City the opportunity to live in the type of house and location they desire	Including up to 405 Affordable Homes	Including up to 518 Affordable Homes	Including up to 660 Affordable Homes
Delivering significant financial contributions towards the improvement of the City's infrastructure including the provision of S106/CIL payments and land for the potential widening of the A1237 ring road in the future.	S106/CIL payments will increase proportionately for each Option		
New capital construction expenditure from private funding	£163m	£208m	£268m
Creation of substantial direct and indirect employment opportunities, including apprenticeships, of which 70% are usually retained in the local area.	361 Jobs	461 Jobs	579 Jobs
Sustaining and improving the District's labour market through delivering the right homes in the right locations.	Benefit will increase proportionately for each Option		
Increased retail and leisure expenditure in the local area per annum	£32m	£41m	£51m
Creation of additional jobs within the local retail and leisure sector	196 Jobs	250 Jobs	299 Jobs
Provision of funding towards public services from the Government's new homes bonuses	£12.4m	£15.8m	£19.2m
Provision of funding towards public services from annual Council tax payments	£2.07m	£2.6m	£3.2m
Provision of services including superfast broadband			

It is clear that all three of our proposed new Garden Village options for the Clifton Gate site can deliver substantial economic, social and environmental benefits to the local area and wider City.

The National Planning Policy Framework seeks to encourage sustainable growth and identifies in Paragraph 8 that economic growth, such as that which this site can deliver, can secure higher social and environmental standards. Furthermore, Paragraph 52 identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements that follow the principles of Garden Cities (or a Garden Village in this case).

A NEW 21ST CENTURY YORKSHIRE GARDEN VILLAGE – PRESERVING THE CHARACTER AND SETTING OF YORK

We believe it is important to again present to CYC the vision of our development proposals, as these are a key justification for the Council to expand the red line site allocation boundary.

A Vision Document, prepared jointly by JTP Architects and Turkington Martin Landscape Architects, is submitted alongside these representations. The document identifies the vision to deliver: -

A new village with its own identity and good local facilities to meet the everyday needs of residents as the community grows over time. A new village which is well-connected to the centre of York and surrounding settlements by sustainable modes of transport but clearly separated and screened from existing settlements to avoid coalescence. A place that feels a part of York but is still a separate place.

The vision for the site's development, as set out within the development masterplans which are enclosed within the document, has been prepared following a comprehensive assessment of the landscape character of the site and the surrounding areas.

One of the key characteristics of York is how the city developed out from its historic core in the form of radial corridors separated by a series of green fingers. The proposed site aligns with one of these development corridors which extends radially outwards north-west of York City Centre. The proposed development sits between two green fingers, consisting of the Ouse Corridor to the west of the site, and Bootham Stray to the east. These green fingers positively contribute towards York's green infrastructure network, enhancing the amenity and biodiversity value of existing routes into the city centre and links nature conservation sites with other open space. They also preserve the notion of approaching the city through the countryside.

The Outer Ring Road currently demarcates the urban area of York from the surrounding Green Belt countryside. Where settlements are close to this road, there is a separation distance ranging between 60m and 400m. This has the appearance of reinforcing the village character which is distinct from suburban York. This can be seen in the relationship of villages such as Poppleton, Earswick and Haxby with the ring road and the city beyond. The proposal to set the new development back a distance between 250m and 460m from the outer Ring Road as proposed would establish a village character, provide a distinct identity of the development, and reinforce the separation from the edge of York.

In all three of the proposed development options, the built edge of the new village will be 1 kilometre from Skelton and will also be well screened from the east by existing mature woodland and set away from Wigginton Road; preserving the rural character of the route into the city centre.

Screening is provided by existing plantations to the east and mature hedgerows adjacent to Bur Tree Dam to the west, with proposed planting further restricting views into the site. The extent of screening landscape elements will result in distant glimpsed views into the new village centre from Wigginton Road, minimising visual impact on adjacent green corridors.

Existing fragmented woodland will be linked and strengthened with new tree planting, green spaces and sports pitches. A series of linked green spaces will encircle the village, providing recreation for the new community and ensuring a green buffer from Clifton Moor and a low density edge from the surrounding countryside. Sport pitches and school playing fields will be located on the site's western boundary, to deliver active uses adjacent to the wider open countryside.

A new village centre with a cluster of local facilities around an attractive village square with a pond will provide a focus for the new village. The square will accommodate seasonal markets and events. There will also be a new pedestrian/cycle subway link to Clifton Moor shopping centre. Small scale workshops, a health centre and older people's housing is also proposed.

Existing water features including ponds and streams will be incorporated into the new village layout. New water features relating to the Suds systems will also be added. These features will together form an integral aspect of the new streets and open spaces adding character and drawing on precedents from surrounding villages.

Linear green spaces will run through the residential area and incorporate watercourses and existing hedgerows. These linking green spaces will create a network of pedestrian routes through the site and define individual neighbourhoods within the new development. They will accommodate a range of community and recreational facilities such as play areas and allotments. Importantly, the green corridors which run through the site have been positioned in order to preserve views of York Minster.

With regard to the proposed Option 3, additional open space is also to be provided to the site's northern edge in order to provide a robust green wedge between the site and Moor Lane. It is envisaged that the

open space in this location will be in the form of new accessible areas of woodland planting and also land available for the expansion of the existing cemetery.

The developers of the site will also seek to work alongside *Treemendous York* to aid their objective of planting 50,000 new trees within the City in order to promote a healthier, greener, more environmentally friendly, successful and beautiful city.

The development proposals can deliver an exemplary new Garden Village which respects the historic character of the City. It can deliver new homes alongside significant areas of community and green infrastructure, in a sustainable location within proximity of the City's existing urban edge. It will be separated and screened from existing settlements to avoid coalescence, but though a separate place, it will still very much feel a part of York.

MEETING THE CITY OF YORK'S FUTURE HOUSING NEEDS

We maintain our view that there is a case for the identification of additional housing allocations to those currently proposed by CYC in order to meet the City's housing needs over the proposed plan period.

BDW have previously instructed Barton Willmore to undertake a Technical Review of the Council's SHMA and the SHMA addendum, which was prepared by GL Hearn in June 2016, to assess the Council's methodology that has been utilised in formulating the objectively assessed need (OAN).

At present the Council have maintained their decision to progress with a housing target which is based solely on the baseline figure which is derived from the ONS 2014-based sub-national household projections and does not include the 10% uplift for market signals which is advised within the Council's latest SHMA.

By omitting the 10% uplift, and not progressing with a housing requirement of 954 dwellings per annum, the Council are failing to meet their full OAN, as required by the Framework and the Planning Practice Guidance (PPG). There are considered to be no overarching constraints within the District that justify the Council not delivering their full OAN. Such an approach therefore fails to meet any of the tests of soundness set out in paragraph 182 of the NPPF as the Local Plan is not positively prepared; justified; effective and consistent with national policy.

No new evidence has been provided by the Council to justify the removal of the SHMA's proposed 10% uplift for market signals and it is assumed that this has been viewed as a way of reducing the overall housing target. This is unacceptable and is not a sound and robust means of preparing a Local Plan.

The Government's consultation document "*Planning for the Right Homes in the Right Places*" (September 2017) identified a proposed standardised methodology for the calculation of the baseline OAN for each of the Country's Local Authority areas. The Government's proposed standardised methodology includes for an uplift for market signals over and above the baseline figure and in the specific case of York, would lead to a housing requirement of 1,070 dwellings per annum.

Since the commencement of CYC's consultation on the Publication Draft Local Plan, the Government have published further consultation documents associated with a Revised National Planning Policy Framework and Draft National Planning Practice Guidance in March 2018.

The Draft National Planning Practice Guidance (Draft NPPG) provides further guidance in respect of the calculation of an LPA's OAN. The document maintains the proposed standardised methodology for the calculation of OAN, using household projections as the baseline and an uplift for market signals. However, it also identifies the following other key considerations: -

- Plan-making authorities should not apply constraints to the overall assessment of need. Limitations including supply of land, capacity of housing markets, viability, infrastructure, Green

Belt or environmental designations, are considerations when assessing how to meet need. These types of considerations are not relevant to assessing the scale of that need.

- 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). **We would consider the impact of anticipated growth through an Enterprise Zone (York Central, which is also an identified Housing Zone) to be included as an appropriate circumstance to increase housing growth as well. CYC have also submitted two Housing Infrastructure Fund bids to Government as well. One at York Central and one at the Clifton Gate site to which these representations relate (discussed further below).**
- The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow. The total affordable housing need can 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 strategic plan may need to be considered where it could help deliver the required number of affordable homes. **Given York's affordable housing needs, we consider that compelling evidence is available to justify an uplift in the OAN on in order to meet such housing needs.**

Although the Revised NPPF and Draft NPPG are still subject to consultation, they provide a further indication as to how the Government considers housing requirements should be calculated, and the consideration of market signals, strategic growth (employment & housing) and affordable housing as key issues to be considered. Which align closely with the current provisions of the NPPF. Put simply, the guidance provided in the bullet points above cannot be ignored.

Barton Willmore's own Technical Review of the Council's SHMA as part of their "Open House" OAN model work, concluded that when a Market Signals Uplift is included, the full objectively assessed need is considered to range between 920 dwellings per annum and 1,070 dwellings per annum. The higher end of Barton Willmore's threshold therefore directly aligns with the figure that is generated when utilising the Government's standardised OAN methodology (without the consideration of any uplift for strategic growth or affordable housing).

The Council are now in a position where their own evidence; Barton Willmore's Open House work; and the Government's proposed standardised methodology, all state that an uplift for market signals should be added to the baseline figure, and all of which indicate that the true full OAN is greater than the 867 dwellings per annum which is being proposed.

Therefore, in order to make the plan sound, the housing figure should be adjusted upwards to consider market signals, strategic growth and affordable housing needs. This in turn will require additional sites to be allocated for residential development.

Our clients have also previously identified concerns with the approach taken by CYC with regard to the delivery of windfall development throughout the plan period. Such a reliance on unplanned development is contrary to the legislative provision of a plan-led system and should not form the basis of the CYC

Local Plan moving forwards. Such an approach will not direct homes to those areas that have seen limited growth over recent years and have a clear need for new homes in the future. It is also highly likely that no affordable housing will be provided on windfall sites located in the Urban Area on account of the 15-dwelling threshold proposed in draft Policy H10.

Finally, there are also concerns associated with the deliverability of the York Central and Barrack sites.

In respect of York Central this relates to uncertainties over the timescales associated with the site's initial infrastructure works and the final quantum of new homes that can be delivered at the site. We have raised a number of concerns over the ability of the York Central site to deliver the proposed number of homes within the plan period at every stage of consultation on the Local Plan. However, notwithstanding these comments, the number of homes anticipated to be delivered at the site has been increased to between 1,700 and 2,500, with a minimum of 1,500 homes within the plan period. The provision of a range of housing numbers is evidence to justify our case of the uncertainties associated with the development of the site. Furthermore, there is no justifiable evidence to back up these figures. Further evidence in respect of our client's concerns associated with the delivery of the York Central site are provided in the overarching representations prepared by Barton Willmore.

With regard to the Barrack sites, the concerns relate to **when** and **if** both of the sites will become available for development within the plan period. At present no concrete evidence has been provided by the Ministry of Defence that these sites are indeed no longer needed.

Unless these current uncertainties are resolved, it is our view that the quantum of new homes to be delivered at these sites should be considered over and above the identification of housing allocations to meet the City's housing needs. If not, there is a real possibility that that the City could fail to demonstrate the delivery of a sufficient number of deliverable housing sites to meet the City's housing requirement.

Finally, the Publication Draft Local Plan is again relatively silent in respect of the provision of Safeguarded Land and the role this plays in ensuring long term permanence to the Green Belt. Paragraph 85 of the Framework identifies that where necessary LPA's need to plan for longer term development needs "*stretching well beyond the plan period*" through the designation of Safeguarded Land. There are varying examples within recently approved Development Plan documents of what a timescale of "*well beyond the plan period*" can equate to which differ between an additional 10% of land allocations; an additional 5 years' worth of land; or in some cases 10 years' worth of land. It could be argued the greater amount of safeguarded land identified, the greater permanence can be provided to the Green Belt.

In respect of the Clifton Gate site, we support the Council's approach that the larger strategic site allocations will contribute to delivering long term Green Belt permanence where they will deliver homes beyond the initial plan period. An increase of the Clifton Gate site to 2,200 new homes in size as proposed within these and previous representations would make an additional valuable contribution towards providing enduring Green Belt boundaries for the City well beyond the plan period.

In conclusion, when each of the above points are considered holistically, there is a compelling case for the release of additional land as housing allocations within the emerging CYC Local Plan in order to meet the City's full objectively assessed housing needs, such as an extension of our client's Clifton Gate site to deliver at least 1,725 homes.

Notwithstanding the above, in the first instance CYC ensure that the site allocation red line boundary for their proposed number of homes (1,348) at the Clifton Gate site is correct to ensure the comprehensive delivery of the Council's community and green infrastructure aspirations for the site as required by Policy SS12 of the Publication Draft Local Plan.

HOUSING INFRASTRUCTURE FUND BID – SEPTEMBER 2017

As identified above, CYC recently submitted a Housing Infrastructure Fund (HIF) bid to the Government with the aim of accelerating the delivery of new homes from the Clifton Gate site within the plan period.

The Council's bid requested £9.845m funding towards the provision of the site's initial highways infrastructure in order to accelerate the delivery of homes at the site, providing an **additional 280 homes** on site by 2022/2023 and the delivery of all 1,350 homes by 2028/2029.

For the avoidance of any doubt the funding would deliver an additional 280 homes above the anticipated 420 homes which we proposed to deliver within 5 years of the adoption of the Local Plan. Please refer to the previously submitted representations for a full breakdown of the site's delivery timescales.

The HIF funding would enable the delivery of both of the two proposed access points for the site at commencement of development, meaning that the site's delivery will be developed by four separate house builder outlets immediately. Without the requested funding from the HIF only one access point would be delivered on account of cash flow/return on capital expenditure matters, resulting in the commencement of development from two house builder outlets for the first few years.

At present it is anticipated that the development will deliver a yield of at least 120 homes per annum with the potential to deliver up to 150 homes per annum. However, should CYC's HIF bid be successful, this could potentially deliver up to 200 homes in the early stages of the development on account of latent demand and four house builders developing from the site immediately.

The proposed community infrastructure and areas of public open space will be delivered commensurate with the progression of the development and made available for use as required. Meaning the accelerated housing delivery would also deliver the development's community infrastructure (Primary Schools, Village Centre, Health Centre, Elderly Care Homes) much quicker as well.

On account of the substantial initial site infrastructure requirements and costs, the delivery of new homes from the site will not reach its maximum potential for a 2 to 3-year period. Accordingly, the requested funding will enable the acceleration of housing delivery within the first year of the receipt of planning permission.

Should the Council's HIF bid be successful our client's Development Options 2 & 3 would clearly become fully deliverable within the proposed plan period. Which along with the evidence provided above in respect of housing needs and safeguarded land, provides a further planning argument associated with the allocation of our client's larger development options for the site.

Importantly, CYC's HIF bid is based on BDW's and TWF's proposed red line site allocation boundary for 1,350 homes (our Option 1). Therefore, as it stands, the Council's HIF bid and the Local Plan don't align.

CYC were informed by letter dated 20th March 2018 of the Government's decision to progress with the Clifton Gate bid to the co-development stage of the competitive HIF process. As part of this process we will work alongside CYC to present a business case for the funding, which will in due course be assessed by the Government prior to a final funding decision being made.

Consequently, in order for CYC to increase the chances of obtaining the funding requested in the HIF bid, the site allocation red line boundary needs to be expanded to ensure that the site's area identified within the HIF bid and the Local Plan align.

As stated above, not only will the HIF bid funding accelerate the delivery of new homes at the site, but it will also accelerate the delivery of the proposed community and green infrastructure at the site as well. Thus, enhancing the sustainability of the proposed new Garden Village as early as possible in the plan period.

MECHANISM TO AMEND THE SITE ALLOCATION BOUNDARY

There is a legal process which CYC can undertake in order to amend the red line site allocation boundary ahead of the submission of the Local Plan to the Secretary of State.

The process includes the following steps: -

- Amend the Local Plan's Proposal Maps;
- Update the Local Plan's Sustainability Appraisal;
- Update Local Plan Policy SS12 (with regards to the number of homes to be delivered from the site within the Local Plan period); &
- Reference the amendments to the Proposal Maps and Policy SS12 within a Modifications Document to be submitted to the Secretary of State along with the Local Plan.

In order for the Local Plan to meet its legal obligations, it is necessary for the Sustainability Appraisal to be up to date in respect of the final, submitted, red line site allocation boundary for the site and the quantum of development proposed.

Consequently, should CYC update the current Sustainability Appraisal in accordance with the red line site allocation boundary proposed within our representations for the 1,350 homes option, and include reference to the quantum of development identified in the table above on Page 5 of these representations, then CYC would be legally allowed to amend the red line site allocation boundary prior to the submission of the Local Plan to the Secretary of State.

As adequate consultation has already taken place on a variety of development options for the site previously, including a much larger site area, the Local Plan would be considered sound with regards to the obligations of national planning policy and guidance.

We urge CYC to undertake the tasks identified above to ensure that the Local Plan can be found sound on the submission of the Local Plan to the Secretary of State in respect of Local Plan Policy SS12.

CONCLUSIONS

On the basis of the information provided within this letter, and the enclosed documentation, we wish to place on record our **support** for the proposed allocation of Land to the West of Wigginton Road which is currently proposed by CYC as a new Garden Village within the emerging City of York Local Plan.

Whilst we want to work alongside CYC to ensure the delivery of a sound Local Plan for the City, we are concerned that unless changes are made to the Publication Draft Local Plan prior to its submission to the Secretary of State, it will not be in a position where it can be found sound. With regards to the Clifton Gate site, this relates to the proposed site allocation boundary.

Whilst we support the principles of the allocation of the site, we believe that amendments are required to the site's proposed boundaries in order to ensure that CYC's Garden Village philosophy for the site can be delivered alongside each of CYC's identified Planning Parameters.

Whilst the delivery of 1,348 homes at the site within the plan period can be considered sound in respect of Paragraph 182 of the NPPF. We believe that Policy SS12 of the Local Plan would be considered more robust and sound if the red line site allocation boundary is amended to mirror that which we propose in our client's 1,350 home option.

The requested amendment to the proposed red line site allocation boundary will also substantially enhance the prospect of CYC being successful in their HIF bid for the Clifton Gate site, as CYC's HIF bid is based on BDW's and TWF's proposed site allocation red line boundary for 1,350 homes (our Option 1).

Furthermore, these representations have also presented a compelling case for the release of additional land as housing allocations within the emerging CYC Local Plan in order to meet the City's full objectively assessed housing needs.

Consequently, we have presented three potential development options to the Council to provide a new Garden Village of either 1,350 homes; 1,725 homes; or 2,200 homes alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities. There is also an argument to suggest that a development of up to 2,800 homes could be provided at the site, which of course was a previous option put forward by CYC in the withdrawn Publication Draft Local Plan (October 2014).

The site is strategically located to the north of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible.

The development proposals are situated in a **suitable** and highly sustainable location and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. The site is **available** now as it is under the control of a national house builder and regional development company who are actively seeking to secure planning permission for the residential development of the site. The site can also be considered **achievable** as our clients can deliver new homes on the site within the next five years.

In light of the guidance provided in Paragraph 182 of the NPPF, we consider the following: -

- The Local Plan is **positively prepared** in respect of the delivery of 1,348 homes at the Clifton Gate site as the delivery of homes from the site will contribute significantly to meeting the evidenced objectively assessed development and infrastructure requirements of the City.
- The Local Plan is **justified** in respect of the Clifton Gate site as compelling evidence has been provided in this and previously submitted representations to demonstrate that the site's allocation is the most appropriate strategy for delivering a sustainable Garden Village of 1,348 homes in this location of the City, when considered against the reasonable alternatives, based on proportionate evidence;
- The Local Plan is **effective** as the proposed housing numbers at the Clifton Gate site are entirely deliverable within the plan period; &
- The Local Plan is **consistent with national policy** in respect of the Clifton Gate site as compelling evidence has been provided to demonstrate that the proposed development will deliver sustainable development within the plan period. Particular in respect of Paragraph 52 of the NPPF which identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements that follow the principles of Garden Cities (or a Garden Village in this case).

Finally, in respect of procedural matters, we would like to work alongside CYC to finalise the site specific strategic development policy to be included within future versions of the Local Plan. Working together we can ensure that CYC's and the local community's planning parameters for the site are deliverable.

Should you require any further details or clarification on the content of this letter please do not hesitate to contact me.

Yours sincerely,



PAUL BUTLER

Director

paul.butler@pbplanning.co.uk



CLIFTON GATE

A 21st Century Yorkshire Garden Village

CONCEPT MASTERPLAN

For

TW Fields Ltd with
Barratt Homes Yorkshire East Division
& David Wilson Homes Yorkshire East Division

August 2016

CLIENT

TW Fields Ltd with
Barratt Homes Yorkshire East Division
& David Wilson Homes Yorkshire East Division

THE TEAM



JTP
23-25 Great Sutton Street,
London EC1V 0DN
T. +44 (0)20 7017 1780 F. +44 (0)20 7017 1781

www.jtp.co.uk

turkington martin

turkington martin
3.05 Chester House, Kennington Park,
1-3 Brixton Road London SW9 6DE
T. +44 (0)20 3567 1050

www.turkingtonmartin.com

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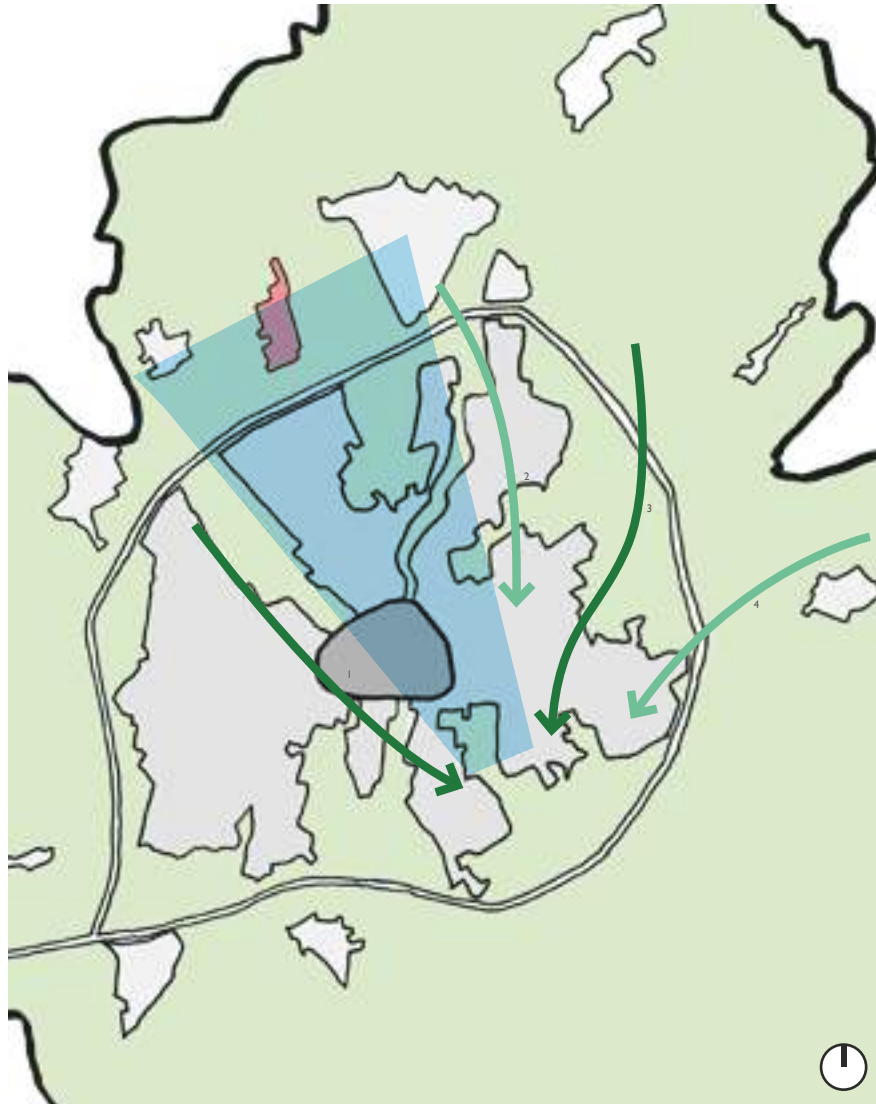
I. VISION

A 21ST CENTURY YORKSHIRE GARDEN VILLAGE

- A new village with its own identity and good local facilities to meet the everyday needs of residents as the community grows over time.
- Well-connected to the centre of York and surrounding settlements by sustainable modes of transport but clearly separated and screened from existing settlements to avoid coalescence.
- A place that feels a part of York but is still a separate place.



2.1 GREEN CORRIDORS – APPROACH TO CITY CENTRE



- KEY**
- City Centre
 - Urban area
 - Site
 - NW urban 'wedge'
 - Green corridors of regional importance
 - Green corridors of district importance
- 1 Ouse corridor
 - 2 Bootham Stray
 - 3 Foss corridor
 - 4 Monk Stray

One of the key characteristics of York is how the city developed out from its historic core in the form of radial corridors separated by a series of green fingers. The proposed site aligns with one of these development corridors which extends radially outwards north-west of York City Centre.

The proposed development sits between two green fingers, consisting of the Ouse Corridor to the west of the site, and Bootham Stray to the east.

These green fingers positively contribute towards York's green infrastructure network, enhancing the amenity and biodiversity value of existing routes into the city centre and links nature conservation sites with other open space.

They also preserve the notion of approaching the city through the countryside

2. WIDER CONTEXT

2.2 DISTANCE AND SCREENING OF VIEWS FROM SKELTON

The built edge of the new village will be 1 kilometre from Skelton and accessible via a footpath and cycle path over fields.

KEY

-  Site Area
-  Urban Area
-  Countryside / Green Corridors
-  River
-  Outer Ring Road
-  Arterial routes into York City Centre
-  Existing woodland
-  Existing mature hedgerow with mature trees
-  Proposed tree and hedgerow planting
-  Views towards site screened by landscape elements
-  Glimpsed views into site between landscape elements



2.3 DISTANCE SCREENING OF VIEWS FROM WIGGINTON RD

The village will be well screened from the East by existing mature woodland and set away from Wigginton Road; preserving the rural character of the route into the cite centre.

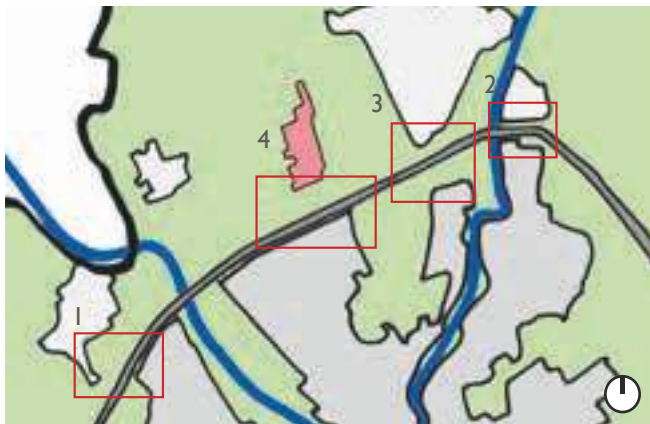


2. WIDER CONTEXT

2.4 DISTANCE AND SCREENING OF VIEWS FROM RING ROAD

The Outer Ring Road currently demarcates the urban area of York from the surrounding Green Belt countryside. There are no present examples of the suburban area of York extending beyond the Outer Ring Road. Where settlements are close to this road, there is a separation ranging between 60 and 400m. This has the appearance of reinforcing the village character which is distinct from suburban York. This can be seen in the relationship of villages such as Poppleton, Earwick and Haxby with the ring road and the city beyond.

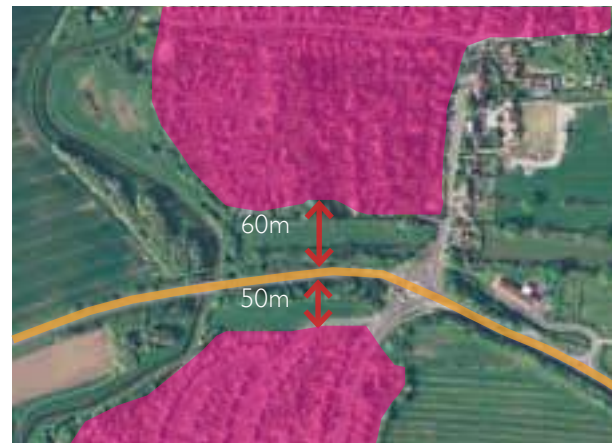
Setting new development back 400m from the outer Ring Road as proposed would establish a village character, provide a distinct identity of the development, and reinforce the separation from the edge of York.



1. Poppleton



3. Haxby



2. Earwick



4. Proposed Site

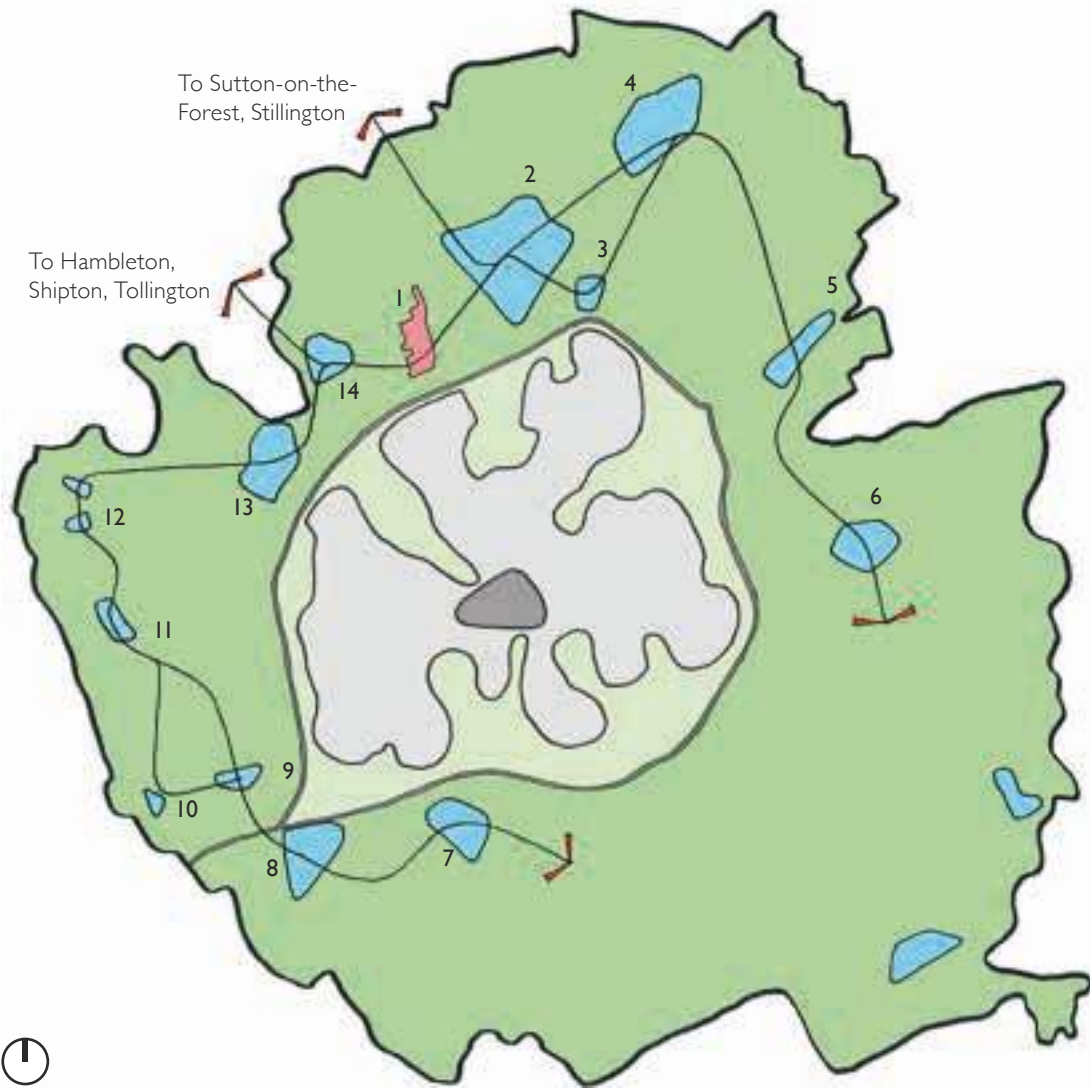


2. WIDER CONTEXT

2.5 RELATIONSHIP TO EXISTING VILLAGES

The site is in Green Belt land, which surrounds the city beyond the Outer Ring Road. This road acts as a physical and psychological barrier between the development and suburban edges of York. The site will have a distinct character and its location is comparable with other adjacent villages such as Skelton and Wigginton.

The site has the potential to contribute to the network of villages that surround York. New east/west connections should be made through safe walking routes and cycle paths, encouraging residents to share community facilities with surrounding villages.



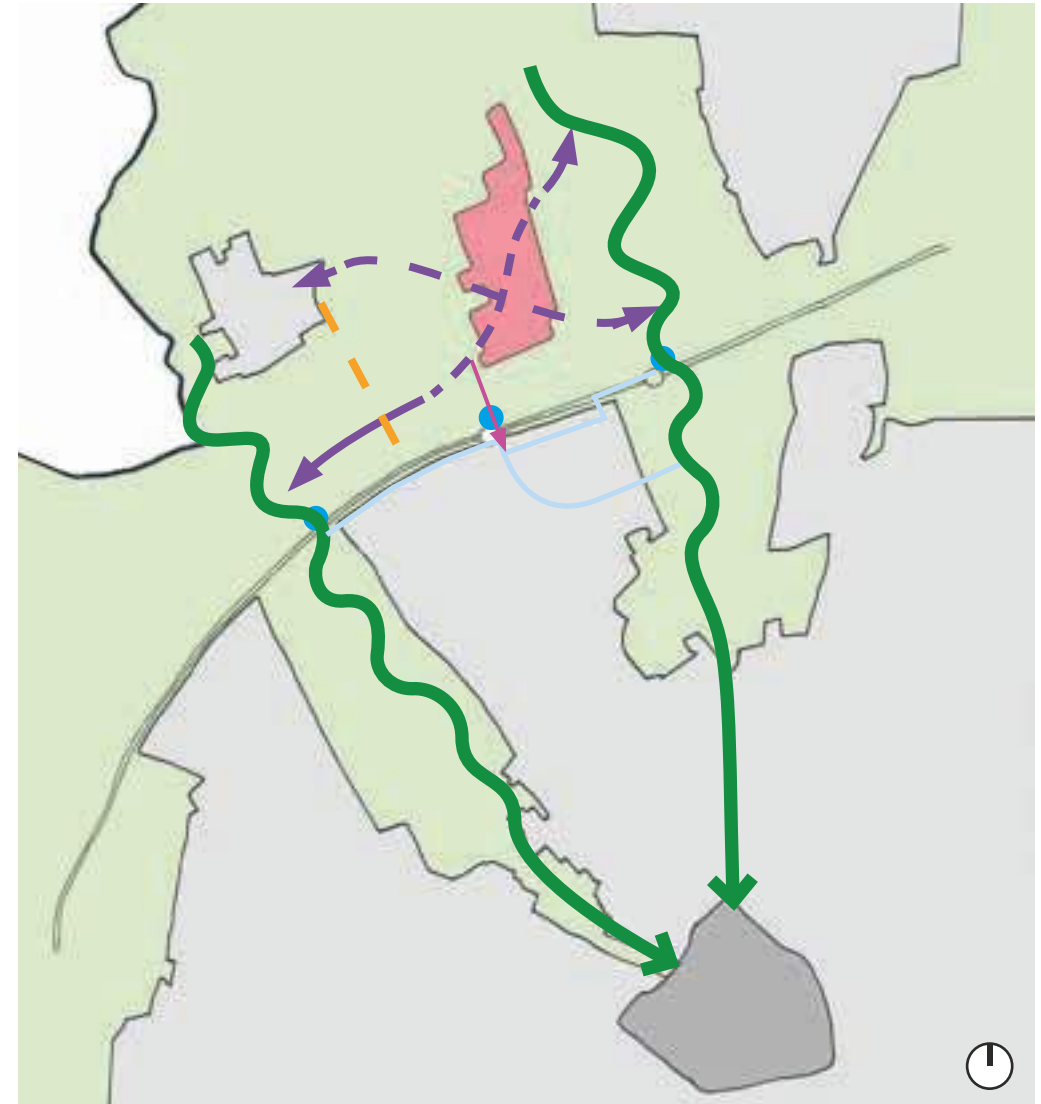
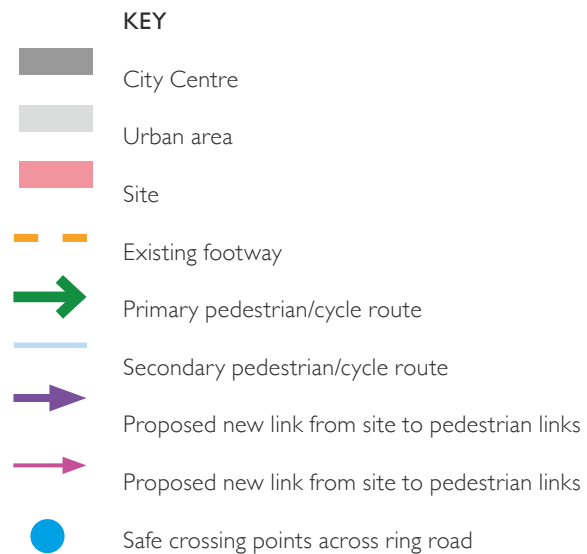
KEY	
	City Centre
	Urban area
	Site
	Villages
	Green belt
	Links to surrounding villages
1	Clifton Gate
2	Wigginton/Haxby
3	Earswick
4	Strensall
5	Stockton on the Forest
6	Dunnington
7	Bishopthorpe
8	Copmanthorpe
9	Askham Bryan
10	Askham Richard
11	Rufforth
12	Hessay
13	Upper and Nether Poppleton
14	Skelton



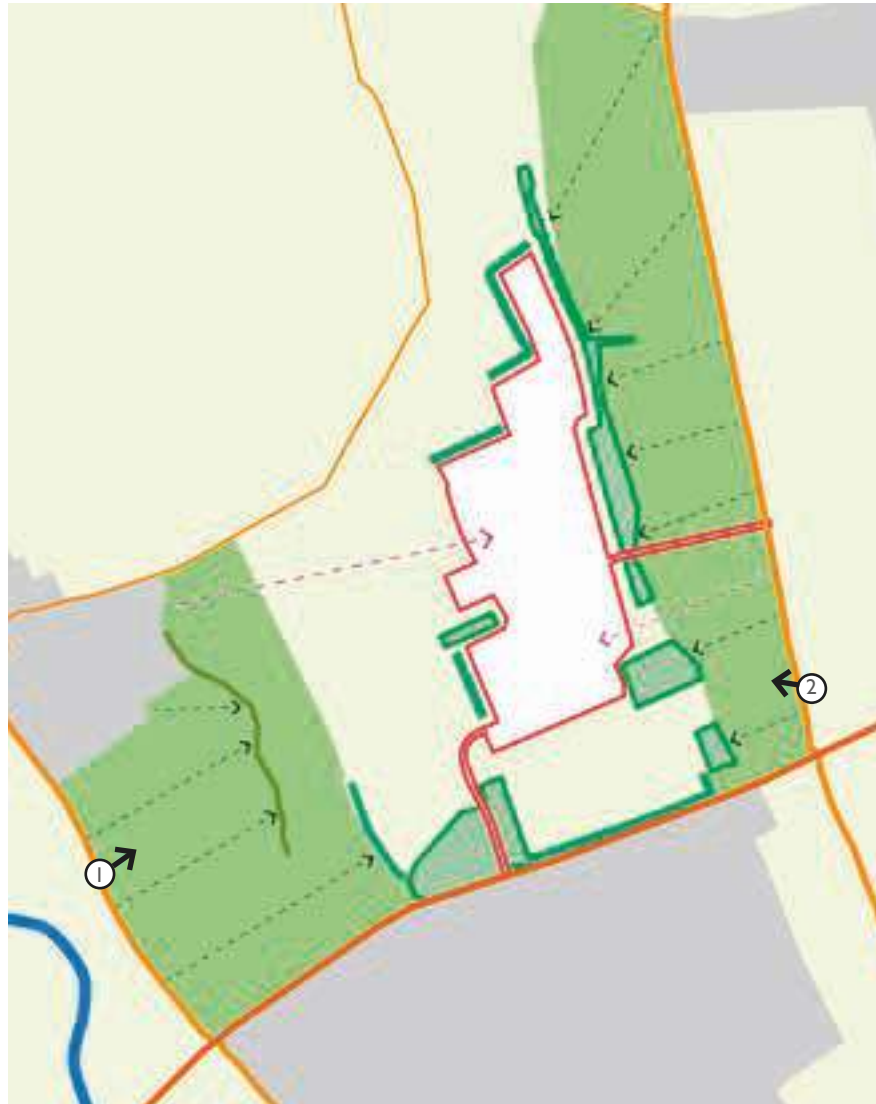
2. WIDER CONTEXT

2.6 SITE CONNECTIONS

The site is located between two green corridors, the Ouse corridor and the Bootham Stray, providing safe pedestrian and cycle connections to York city centre and the feeling of entering the city through a green environment. There is also a series of secondary pedestrian routes to the south of the Outer Ring Road connecting the urban areas of Rawcliffe and Clifton. The site will link directly with these green corridors so that amenity pedestrian routes into the city centre can be created without the passing through urban areas. Links over the ring road will also be provided, connecting the site to the retail area and pedestrian routes beyond.



2.7 VISUAL IMPACT ON GREEN CORRIDORS & AERIAL ROUTES



- Site Area
- Urban Area
- Countryside / Green Corridors
- River
- Outer Ring Road
- Arterial routes into York City Centre
- Green buffer between site and arterial routes into York City Centre
- > Views towards site screened by landscape elements
- - -> Glimpsed views into site between landscape elements

The site is located between two aerial routes into York City Centre. To the east the, Wigginton Road runs through Bootham Stray and to the west the A19 travels adjacent to the Ouse Corridor. The site is set back from both aerial routes, separated by corridors of open countryside measuring between 315-500m the east and 860-1400m to the west.

Screening is provided by existing plantations to the east and mature Hedgrows adjacent to Burtree Dam to the the west, with proposed planting further restricting views into the site.

The extent of screening landscape elements will result in distant glimpsed views into the new village centre from Wigginton Road, minimising visual impact on adjacent green corridors.



View 1 from A19. Double line of mature hedgerow and tree planting located 700m from the road effectively screens site area



View 2 from Wigginton Road. Mature woodland of Moor and Nova Scotia Plantations screen views towards site, with two breaks in woodland extent allowing distant glimpsed view towards proposed urban centre

2. WIDER CONTEXT

2.8 MINSTER VIEWS

Long distance views of York Minster is available across the site at various points along Moor Lane. The diagram below plots these lines of site in relation to the development in order to inform possible viewing corridors that could be incorporated into the Clifton Gate masterplan.

- MV1:** Moor Lane, adjacent to York & District Riding Club
- MV2:** Moor Lane, adjacent to PROW
- MV3:** Moor Lane
- MV4:** Moor Lane, near Glebe Farm
- MV5:** Moor Lane adjacent to Skelton





3. SITE OPPORTUNITIES AND CONSTRAINTS

3.1 HEDGEROWS



KEY

 Hedgerow existing since 1853

Hedgerows

The site contains a significant number of hedgerows which have remained unchanged since at least 1853. These hedgerows are distributed throughout the site in an east-west grid pattern and are likely to contribute positively to ecology as wildlife corridors. They will be assessed for their historic, amenity and wildlife value.

Opportunities

- Soft boundaries to development
- Amenity value
- Wildlife corridors
- Pedestrian & cycle routes
- Screen parts of the development



1853 OS Site Survey

3. SITE OPPORTUNITIES AND CONSTRAINTS

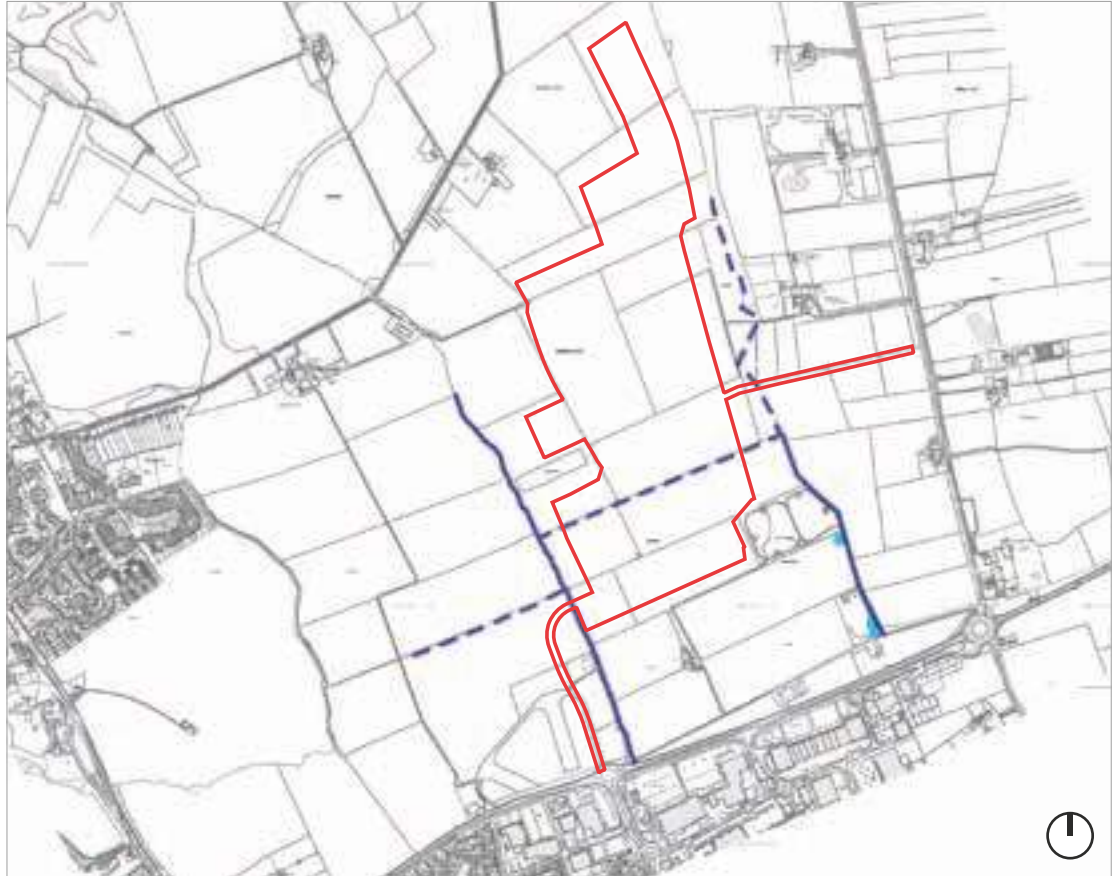
3.2 WATERCOURSES AND PONDS

Watercourses

The site features two historic drainage ditches running N-S, one through the centre of the site and the other adjacent to the eastern site boundary. The latter drains into two ponds, also existing since 1853. The features contribute positively to local ecology.

Opportunities

- Contribute towards SUDs
- Amenity value
- Wildlife corridors
- Pedestrian & cycle routes
- Inform development plots



KEY

- Drainage ditches existing since 1853
- Ponds existing since 1853
- - - Other ditches



1853 OS Site Survey



3. SITE OPPORTUNITIES AND CONSTRAINTS

3.3 TREES AND WOODLAND



- Plantation existing since 1853
 - Plantation existing since 1893
 - Plantation existing since 1991
 - Mature trees
- 1. Skelton Plantation
 - 2. Moor Plantation
 - 3. Nova Scotia Plantation
 - 4. Poplar Plantation

Trees / Woodland

The site contains three plantations, namely Skelton, Moor and Poplar Plantations, dating back to 1893. The Poplar plantation to the SW of the site was extended by 1991 to include land formerly used as the York Municipal Aerodrome. The site shares its NE boundary with the Nova Scotia Plantation, which dates back to 1853.

The site also features a number of mature trees located centrally on historic field boundaries.

Opportunities

- Contribute towards natural & semi-natural open space requirements
- High amenity and wildlife value
- Screen to parts of the development



1893 OS Site Survey

3. SITE OPPORTUNITIES AND CONSTRAINTS






3.4 OTHER CONSTRAINTS

Other constraints

- The outer ring road and Clifton Moor Centre retail park to the south will generate noise and pollution whilst affecting the visual quality of the site's south extent
- The former aerodrome runway to the SW has been identified as a site of possible contamination in the YCC local plan
- Existing victorian buildings of Moor Farm
- Underground water supply running diagonally through the site will affect what development can occur above and adjacent to the route.



KEY

- | | | | |
|---|--|---|-------------------------------------|
|  | Outer Ring Road A1237 |  | Moor farm - Victorian Farm building |
|  | Disused aerodrome runway - potential contaminated land |  | Underground water main |
| | |  | Retail development |



1938 OS Site Survey



3. SITE OPPORTUNITIES AND CONSTRAINTS

3.5 ACCESS AND CONNECTIONS




Access and Connections

Future widening of the Outer Ring Road to create a two lane dual carriageway including an upgrade to the two existing roundabouts will impact on the southern site boundary.

In addition, there will be a Park and Ride facility constructed to the south east corner of the site. Access into the development from the two roundabouts on the Ring Road and potentially from Wigginton Road may result in loss of some or all of the adjacent existing plantations and watercourses.















KEY

-  Vehicular access points
-  Foot / cycle bridge over ring road
-  Pedestrian / cycle access

3. SITE OPPORTUNITIES AND CONSTRAINTS

3.6 COMPOSITE CONSTRAINTS

KEY

-  Hedgerow existing since 1853
-  Drainage ditches existing since 1853
-  Ponds existing since 1853
-  Plantation existing since 1853
-  Plantation existing since 1893
-  Plantation existing since 1991
-  Mature trees
-  Outer Ring Road
-  Disused aerodrome runway
-  Moor Farm - Victorian farm building
-  Underground water main
-  Retail development








4. MASTERPLAN PRINCIPLES

4.1 A SEPARATE VILLAGE SETTLEMENT

The 1 kilometer distance between development in Skelton and Clifton Gate will ensure both places have their own separate identity.



KEY

-  Site boundary
-  Existing settlements
-  Existing buildings

4. MASTERPLAN PRINCIPLES

4.2 GREEN EDGES

Existing fragmented woodland will be linked and strengthened with new tree planting, green spaces and sports pitches.

A series of linked green spaces will encircle Clifton Gate, providing recreation for the new community and ensuring a green buffer from Clifton Moor and a low density edge from the surrounding countryside.

Sport pitches and school playing fields will be located between Clifton Gate and Skelton to bring active uses into the open space between the two villages.

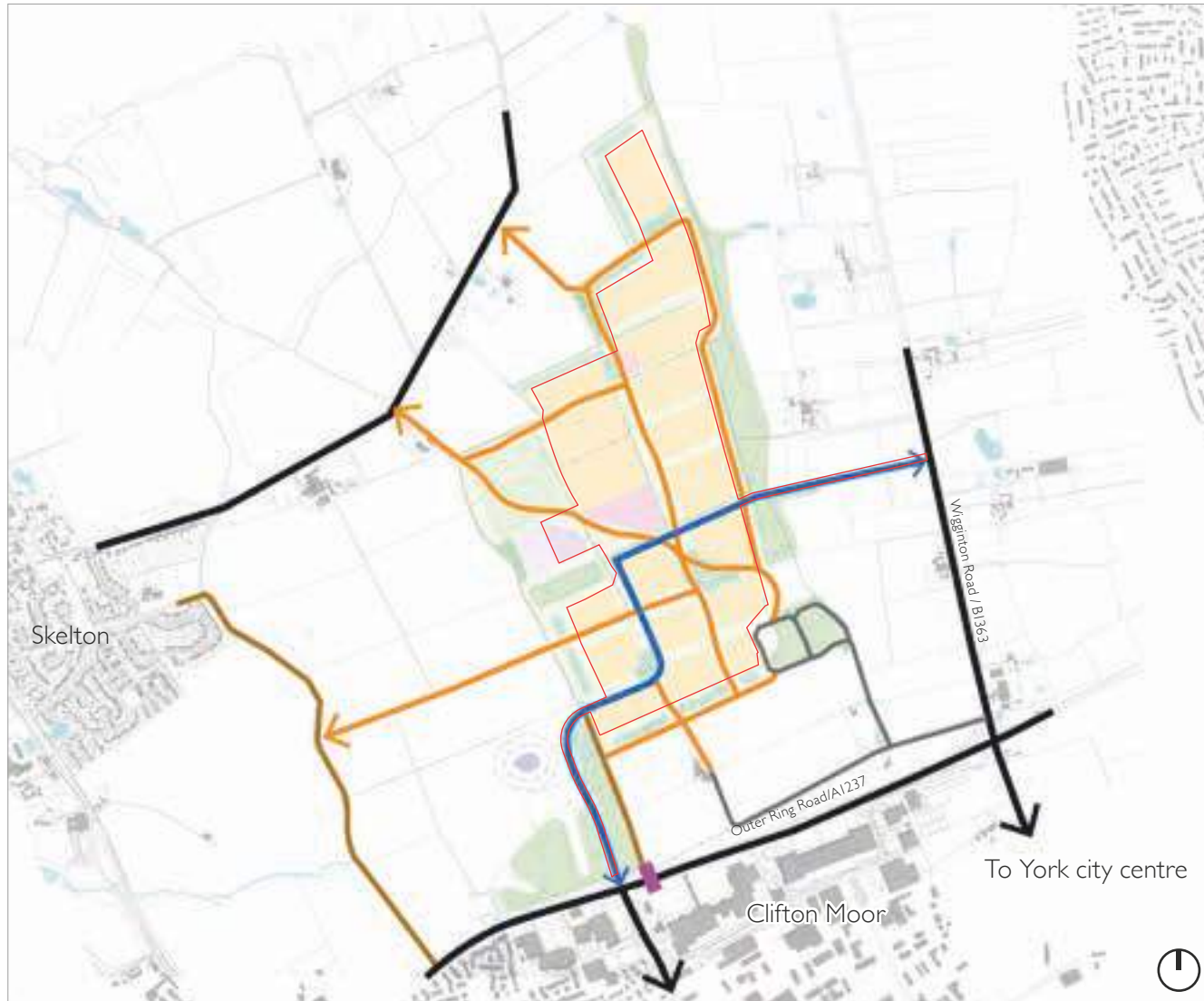


4. MASTERPLAN PRINCIPLES

4.3 WELL CONNECTED



The new village will be well connected to the centre of York and adjacent villages by vehicular, pedestrian and cycle routes.



KEY

- Site boundary
- Existing main roads
- Existing local roads
- Proposed primary vehicular route
- Existing pedestrian and cycle routes
- Proposed footway and cycle routes
- Proposed cycle / footbridge

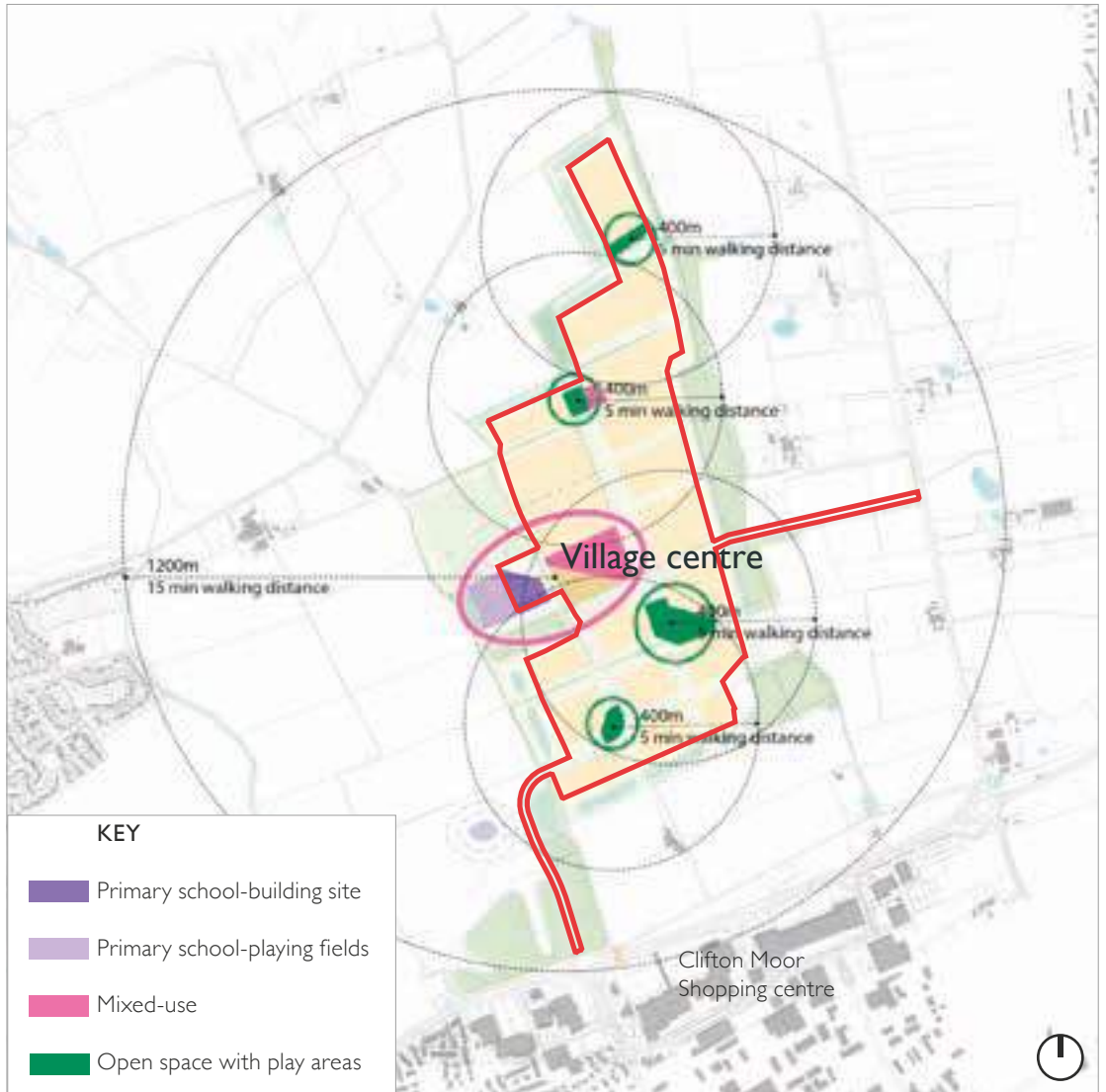
4. MASTERPLAN PRINCIPLES

4.4 WELL SERVED

A new village centre with a cluster of local facilities around an attractive village square with a pond will provide a focus for the new village.

The square will accommodate seasonal markets and events. There will also be a new cycle / footbridge link to Clifton Moor shopping centre.

Small scale workshops, a health centre and older people's housing is also proposed (see section 7 for detail).

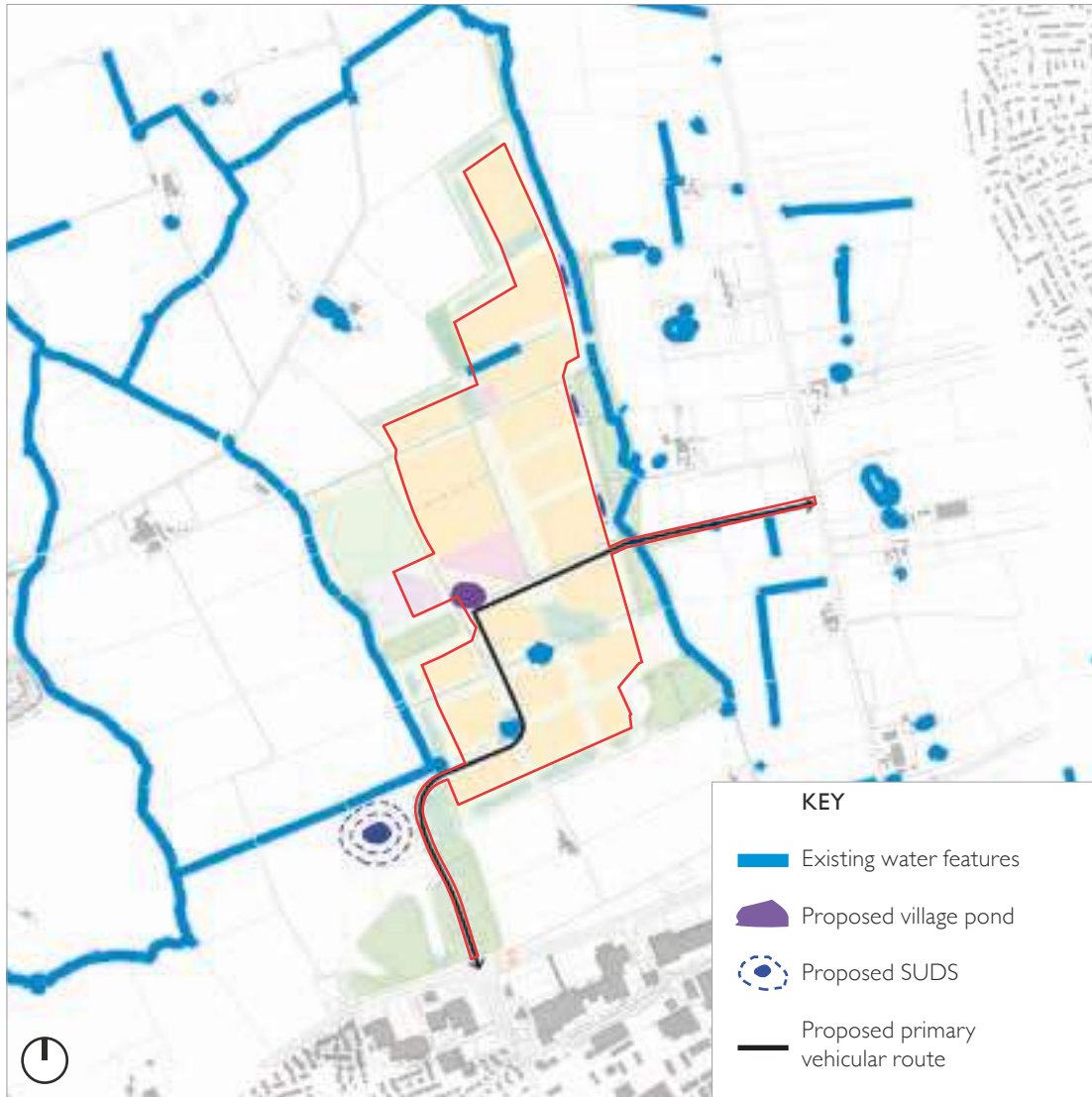




4. MASTERPLAN PRINCIPLES

4.5 WATER FEATURES

Existing water features including ponds and streams will be incorporated into the new village layout. New water features relating to the Suds system will also be added. These features will together form an integral aspect of the new streets and open spaces adding character and drawing on precedents from surrounding villages.



4. MASTERPLAN PRINCIPLES

4.5 GREEN LINKS

Linear green spaces will run through the residential area and incorporate watercourses and existing hedgerows.

These linking green spaces will create a network of pedestrian routes through the site and define individual neighbourhoods within the new development. They will accommodate a range of community and recreational facilities such as play areas and allotments.



4. MASTERPLAN PRINCIPLES

4.6 THE CONCEPT MASTERPLAN



KEY

- Site boundary
- Existing roads
- Proposed primary vehicular route
- Existing pedestrian and cycle routes
- Proposed footway and cycle routes
- Proposed cycle / footbridge
- Primary school-building site
- Primary school-playing fields
- Mixed-use
- Open space with play areas
- Existing water features
- Proposed village pond
- Proposed SUDS
- Existing woodland
- Main green corridors
- Green network

5. MASTERPLAN OPTIONS

5.5 OPTION I - 1350 HOMES

The land use plan and associated schedule demonstrates that 1,350 homes at an average density of around 32 dwellings per hectare can be accommodated within the red line. Sports pitches, school /playing fields, structural planting and other open space associated with the new village are proposed outside the red line.

Land use

Land use	Ha	Acres	Notes
Residential	40.02	98.89	
Mixed- used area [Independent living and apartments]	2.30	5.68	60 Homes plus village shops, community facilities and pub.
Primary school	2.26	5.58	
Open space	16.52	40.82	
Primary vehicular route	4.26	10.53	
Gross area within red line	65.36	161.51	

Housing density in developable areas

Developable areas	Parcel	Ha	Acres	Density [dph]	No. of homes
Residential areas	A	0.90	2.22	20	18
	B	1.85	4.57	30	56
	C	2.13	5.26	35	75
	D	2.85	7.04	40	114
	E	2.23	5.51	35	78
	F	2.39	5.91	35	84
	G	2.79	6.89	30	84
	H	4.10	10.13	25	103
	I	2.88	7.12	20	58
	J	1.80	4.45	30	54
	K	1.58	3.90	35	55
	L	1.98	4.89	35	69
	M	3.42	8.45	40	137
	N	3.10	7.66	35	109
	O	1.55	3.83	20	31
	P	1.49	3.68	30	45
	Q	1.81	4.47	35	63
R	1.17	2.89	20	23	
	Total	40.02	98.89	31.33	1254
Mixed- used area [Independent living and apartments]		2.3	5.68		96
Total		42.32	104.57		1350

5. MASTERPLAN OPTIONS

5.5 OPTION I - 1350 HOMES



KEY

- Site boundary
- Existing streams or ponds
- Existing woodlands (outline representing canopy)
- Existing hedgerow corridors-to be retained
- Residential
- Primary school-building site
- Primary school-playing fields
- Mixed-use
- Open space with play areas
- Outdoor Sports
- Allotments
- Other green/open space
- Primary vehicular route
- Proposed structural woodland
- Proposed cycle / footbridge [Indictive location]
- ⊙ Indictive SUDS location
- Proposed trees [Indictive]



5. MASTERPLAN OPTIONS

5.5 OPTION 2 - 1725 HOMES

This land use plan extends the boundary proposed in Option 1 and demonstrates the capacity to accommodate 1,725 homes based on the same principles.

Land use

Land use	Ha	Acres	Notes
Residential	51.57	127.43	
Mixed- used area [Independent living and apartments]	2.3	5.68	60 Homes plus village shops, community facilities and pub.
Primary school	2.26	5.58	
Open space	12.34	30.49	
Primary vehicular route	4.26	10.53	
Gross area within red line	72.73	179.72	

Housing density in developable areas

Developable areas	Parcel	Ha	Acres	Density [dph]	No. of homes
Residential areas	A	1.24	3.06	20	25
	B	2.52	6.23	30	76
	C	2.33	5.76	35	82
	D	3.40	8.40	40	136
	E	2.86	7.07	35	100
	F	2.89	7.14	35	101
	G	2.79	6.89	30	84
	H	6.16	15.22	30	185
	I	4.60	11.37	20	92
	J	2.49	6.15	30	75
	K	2.05	5.07	35	72
	L	2.10	5.19	35	74
	M	3.42	8.45	40	137
	N	3.33	8.23	35	117
	O	2.38	5.88	20	48
	P	2.50	6.18	35	88
	Q	2.82	6.97	35	99
R	1.69	4.18	25	42	
	Total	51.57	127.43	31.59	1629
Mixed- used area [Independent living and apartments]		2.3	5.68		96
Total		53.87	133.12		1725

5. MASTERPLAN OPTIONS

5.5 OPTION 2 - 1725 HOMES



KEY

- Site boundary
- Existing streams or ponds
- Existing woodlands (outline representing canopy)
- Existing hedgerow corridors-to be retained
- Residential
- Primary school-building site
- Primary school-playing fields
- Mixed-use
- Open space with play areas
- Outdoor Sports
- Allotments
- Other green/open space
- Primary vehicular route
- Proposed structural woodland
- Proposed cycle / footbridge [Indictive location]
- ⊙ Indictive SUDS location
- Proposed trees [Indictive]

6. ILLUSTRATIVE MASTERPLAN

6.1 PREFERRED OPTION

The illustrative masterplan demonstrates how a new Garden Village of 1,725 homes could sit comfortably within the landscape setting. Existing and proposed structural planting would screen views from Skelton and adjacent public highways. Natural features including hedgerows, streams, trees and ponds would form an integral part of the greenspace network and the distant view of York minster from Moor Lane would be maintained.

A mixed use village centre within easy walking distance of new homes would provide an attractive focal space for the new community and serve everyday needs of all age groups.

KEY

- 1 Village square
- 2 Primary school
- 3 Cricket green and pavilion
- 4 Football pitches
- 5 Attenuation ponds
- 6 Allotments
- 7 Play area
- 8 Foot and cycle bridge



7. THE VILLAGE CENTRE

7.1 PLAN WITH KEY AND SCHEDULE

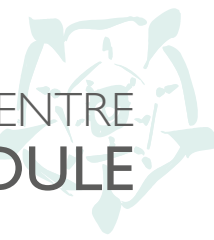
The Village centre will be a contemporary version of a Yorkshire village focused around a welcoming people-friendly space.

Amenities will include a primary school, local shops, a health centre, community hall and pub as well as small workshops and residential space.

There will also be specialised housing for older people with attractive courtyard gardens close to these local amenities.

Non-Residential	Indictive gross floor area	
	sq.m.	sq.ft.
Small-unit retail and foodstore	2398	25815
Live/ work	894	9622
Health centre [incl. pharmacy and flexible upper floors e.g. dentist/office]	1661	17881
Community hall	436	4689
Total	5389	58007

Residential	Units	Indictive gross floor area	
		sq.m.	sq.ft.
Independent living	60	6464	69579
Appartment on top of Small-unit retail and foodstore	36	4291	46187
Total	96	10755	115766



7. THE VILLAGE CENTRE

7.1 PLAN WITH KEY AND SCHEDULE



Building uses

-  Small-unit retail and foodstore with apartments on top
-  Live/ work
-  Independent living
-  Health centre [incl. pharmacy and flexible upper floors e.g. dentist/office]
-  Community hall
-  Primary school

Open space

-  Village square
-  Maker's yard
-  courtyard garden
-  Shared space
-  Health centre & community hall car park

OUR SUCCESS AWARDS



JTP has been named Masterplanning & Public Realm Architect of the Year at the 2016 BD Architect of the Year Awards.

The accolade recognises architects working on the strategic distribution of buildings and infrastructure, as well as the design of hard and soft landscaping in urban environments. Judge's examined all-round design excellence and fitness for purpose over a body of work. JTP's submission included Southall Waterside, Chilmington Green, St Clements, and The Oaks in Prague, all of which were developed through our unique Collaborative Placemaking process.

Awards

We are passionate about placemaking and our unique approach has received high praise, recognised with over 200 design awards over the past twenty years. Some of these are listed here.

We are also the only architectural practice in the UK to have won eight Building for Life Awards, the national standard for well-designed homes and neighbourhoods.

Park Street & Lombard Close, Nottingham, Local Authority Building Control (Labc) East Midlands Region Winners 2016, Best Social Or Affordable New Housing Development • **JTP** The AJ100 (Architects' Journal) Practice of the Year Shortlisted • **Bow River Village**, First Time Buyer Readers' Awards 2016, Best Large Development • **JTP** BD Awards - Masterplanning & Public Realm Architect of the Year Award • **Wimbledon Hill Park**, London Sunday Times British Homes Awards Development of the Year – Scheme of up to 25 homes • **Changzhi Island**, China Successful Design Awards - Award for Social Innovation • **JTP** Best Companies Two Star Status Accreditation • **The Oaks, Prague** AJ120 Awards - Architectural Collaboration of the Year - Shortlisted • **St Clements Hospital**, Bow Placemaking Awards - Community-led Placemaking – Highly Commended • **Water Colour** Placemaking Awards - Best Housing Scheme – Highly Commended • **St Clements Hospital**, Bow National Housing Awards - Overall Winner, Urban Design Group Award • **The Hamptons** Evening Standard New Homes Awards - Best New Large Development • **JTP** Best Companies One Star Status (Accreditation) • **Graylingwell Park**, Chichester Royal Town Planning Institute Planning Awards (South East) Community Engagement Award • **Kip Village, Inverkip** What House? Awards Best Development - Gold • **Water Colour**, Surrey Building for Life Silver Standard • **The Hamptons** What House? Awards Best Development - Bronze, What House? Awards Best Exterior Design - Silver • **Graylingwell Park** Sustainable Housing Awards -Sustainable Larger Social Housing Project of the Year, The Housebuilder Awards - Best Low or Carbon Zero Initiative • **JTPs' London Studio** City of London Sustainable City Awards Sustainable Building of the Year, The AJ100 (Architects' Journal) Sustainable Practice of the Year Shortlisted, Retrofit Awards - Commercial Building Category, Highly Commended, Green Business Awards, Giant Green Business Awards, Islington Council Sustainable Transport (Medium/Large Business), Sustainability and Innovation Award, CoreNet Global UK Chapter Awards • **Water Colour** What House? Awards Best Brownfield Development Silver Award • **Royal Clarence Yard**, Gosport RTPI Regional Award Heritage Category Commended • **Scarborough Renaissance** International Association for Public Participation's (IAP2) Core Values Awards Project of the Year • **JTP** Best Companies One Star Status (accreditation), The AJ100 (Architects' Journal) Practice of the Year Shortlisted • **Scarborough Renaissance** European Enterprise Awards Grand Jury Prize, Enterprising Britain Award Winner • **Royal Clarence Yard** The International Green Apple Awards for the Built Environment and Architectural Heritage Gold Award • **Gunwharf Quays**, Portsmouth Building for Life Silver Standard Award • **Royal Clarence Yard** RICS South East Awards Regeneration Category Runner up • **Water Colour** The Evening Standard New Homes Awards Best New Family Home (4 bed) Burchfield, Best New Family Home (3 bed) Sommer , Best New Starter Home (2 bed) Keller • **Manse Road, Dirleton, East Lothian** Homes for Scotland Quality Awards Rural Small Project Award • **Briery Meadow** (Rowanlea House Type) East Lothian Scottish Home Awards Business Stream House of the Year • **Briery Meadow** Homes for Scotland Quality Awards Rural Large Project Award • **Water Colour** The Daily Telegraph Your New Home Awards Waterside Category: Highly Commended, What House? Award (Property Week/Builder Magazine Group) Joint Gold Winner for Best Brownfield Development • **Urridaholt, Gardabaer, Iceland** BSA/Build Boston Citation for Urban Design, International LivCom Award for Built Projects Silver Award • **Putney Wharf** The Waterways Renaissance Awards Winner of the Design and Construction Category • **The Manor, Lower Earley** Building for Life Silver Standard Award • **Hoebriidge Works** Evening Standard Home of the Year • **Briery Meadow** (Rowanlea House Type) What House? Award (Property Week/Builder Magazine Group) Silver winner for Best House • **The Belvedere, Cambridge** The Daily Mail 4 Star Award for Best Development (Regionally), The Daily Mail 5 Star Award for Best Apartment (Regionally), The Daily Mail Award for Best UK Apartment • **The Village at Caterham Building** Awards Major Housing Project of the Year • **The Hamptons** What House? Award Silver Winner for Best Exterior Design • **Nordica, London** What House? Award Bronze Winner for Best Brownfield Development • **Hoebriidge Works** What House? Award Gold Winner for Best Starter Home • **Cassio Metro** What House? Award Silver Winner for Best Brownfield Development • **The Village at Caterham** Building for Life Gold Standard Award • **Putney Wharf** Building for Life Silver Standard Award • **French Quarter** Housing Design Awards Exhibition of Excellence • **Royal Clarence Yard** Regeneration Awards (Property Week/Builder Magazine Group) Best Housing-led Regeneration Project • **Queen Elizabeth Park**, Guildford Building for Life Gold Standard Award, Your New Home Awards Best Development for Family Living • **Putney Wharf** Planning for London Awards (Mayor's Office) Best Planning Built Project Contributing to London's Future • **Peter Scott Centre** The Waterways Renaissance Awards BURA and The Waterways Trust Heritage and Conservation Award Winner • **Makins Court** The National HomeBuilder Design Awards Commendation for Best Retirement Development • **Lawfords Wharf**, London The National HomeBuilder Design Awards Commendation for Best Small Housing Development • **JTP** Architect of the Year Awards Runner up • **Charter Quay**, Kingston Upon Thames Building for Life Gold Standard Award • **Gunwharf Quays** The National HomeBuilder Design Awards Best Mixed-use Development Commendation for Best Use of a Brownfield Site • **The Village at Caterham** The Deputy Prime Minister's Award for Sustainable Communities Finalist • **Queen Elizabeth Park** The Evening Standard Awards 2003 Best Three Bedroom House & Best Home of the Year • **Makins Court**, Winchester Alresford Society Rosebowl Winner • **Kew Riverside** Bentley International Property Awards Best UK Development Best Architecture (5 star rating) • **Kew Riverside** What House? Award Gold Winner for Best Development • **Charter Quay** The Waterways Renaissance Awards Commendation for Riverside Regeneration Project, The National HomeBuilder Design Awards Best Mixed-Use Development • **The Village at Caterham** The European Urban and Regional Planning Awards 2002 Conversion (Joint Winner) • **Charter Quay** Association of Town Centre Management Annual Awards Best Town Centre Mixed-use Development • **The Village at Caterham** BURA Community Award Caterham Barracks Community Trust • **The Village at Caterham** The RTPI National Awards for Planning Achievement Award for Planning for the Whole Community • **Peter Scott Centre** RICS Award for Regeneration, Silver Unicorn Award from the British Guild of Travel Writers for UK Best New Tourist Attraction, Tourism for Tomorrow Global Winner for Sustainable Tourism • **Freiman Frankfurter** Allgemeine Zeitung Award for Planning Innovation • **Berlinerplatz, Essen**, Germany Robert Jung Prize • **Barnes Waterside** What House? Award Best Luxury Housing Development

OUR SUCCESS OUR CREDENTIALS

JTP Chartered Practice Registration Number 2249624P



JTP Royal Institute of Architects Scotland Chartered Practice Services Number 2363



JTP is a supporter in kind of The Academy of Urbanism which brings together a group of thinkers and practitioners involved in the social, cultural, economic, political and physical development of our villages, towns and cities.

www.academyofurbanism.org



JTP is a member of the NLA,

The organisation is a focus for the debate and discussion of issues facing architecture, planning, development and construction in the capital.

www.newlondonarchitecture.org



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jtp turkington martin



- Key**
- ① Village square
 - ② Primary school
 - ③ Cricket green and pavilion
 - ④ Football pitches
 - ⑤ Attenuation ponds
 - ⑥ Allotments
 - ⑦ Play area
 - ⑧ Foot and cycle bridge

Land to the north of Clifton Moor York
 Illustrative Master Plan
 for TW Fields Ltd
 Barratt Homes & David Wilson Home

Drawing No. 00855_SK_22
 Scale @ A2 1:10000 Rev D1







Land to the north of Clifton Moor York
Land Use Plan
1350 homes option

for TW Fields Ltd
Barratt Homes & David Wilson Homes



























Drawing No. 00855_SK_23
Scale @ A4 1:12500 Rev D4



KEYS

Constraints

-  Site boundary
-  Contour lines
-  Existing streams or ponds
-  Existing woodlands surrounding the site (outline representing canopy)
-  Existing woodlands within the site (outline representing canopy)
-  Designated woodlands - SINC (Site of Importance for Nature Conservation)
-  30m buffer to historic woodlands
-  Existing Category A trees To be Retained (RPA shown with a circle)
-  Existing Category B trees May or May not be Retained (RPA shown with a circle)
-  Existing Category C trees May or may not be retained- TBC (RPA shown with a circle)
-  Existing dead/dying trees To be removed
-  Existing hedgerows Could be removed - TBC
-  Existing important hedgerow corridors (8m) To be retained
-  Areas of potential archaeological interest
-  Emergency Water main with 7.5 m wide easement on each side
-  Overhead electric services
-  Existing buildings
-  Existing A roads (Key vehicular routes)
-  Existing B roads
-  Other important vehicular routes
-  Potential vehicular access into site
-  Potential pedestrain access into site
-  Existing PROWs (Public Rights of Way) and bridleways
-  Existing Key view corridors

Land use

-  Residential
-  Primary school-building site
-  Primary school-playing fields
-  Mixed-use
-  Open space with play areas
-  Outdoor Sports
-  Allotments
-  Other green/open space
-  Primary vehicular route
-  Proposed structural woodland
-  Proposed cycle and footbridge [Indictive location]
-  Indictive SUDS location
-  Proposed trees [Indictive]

Land to the north of Clifton Moor York Land Use Plan

Keys

for TW Fields Ltd
Barratt Homes & David Wilson Homes



Drawing No. 00855_SK_
Scale @ A4 Rev -



Land to the north of Clifton Moor

Schedules

27.10.17

1350 Homes Option

Refer to 00855_SK23_D4_Land use plan_1350 homes option_A4

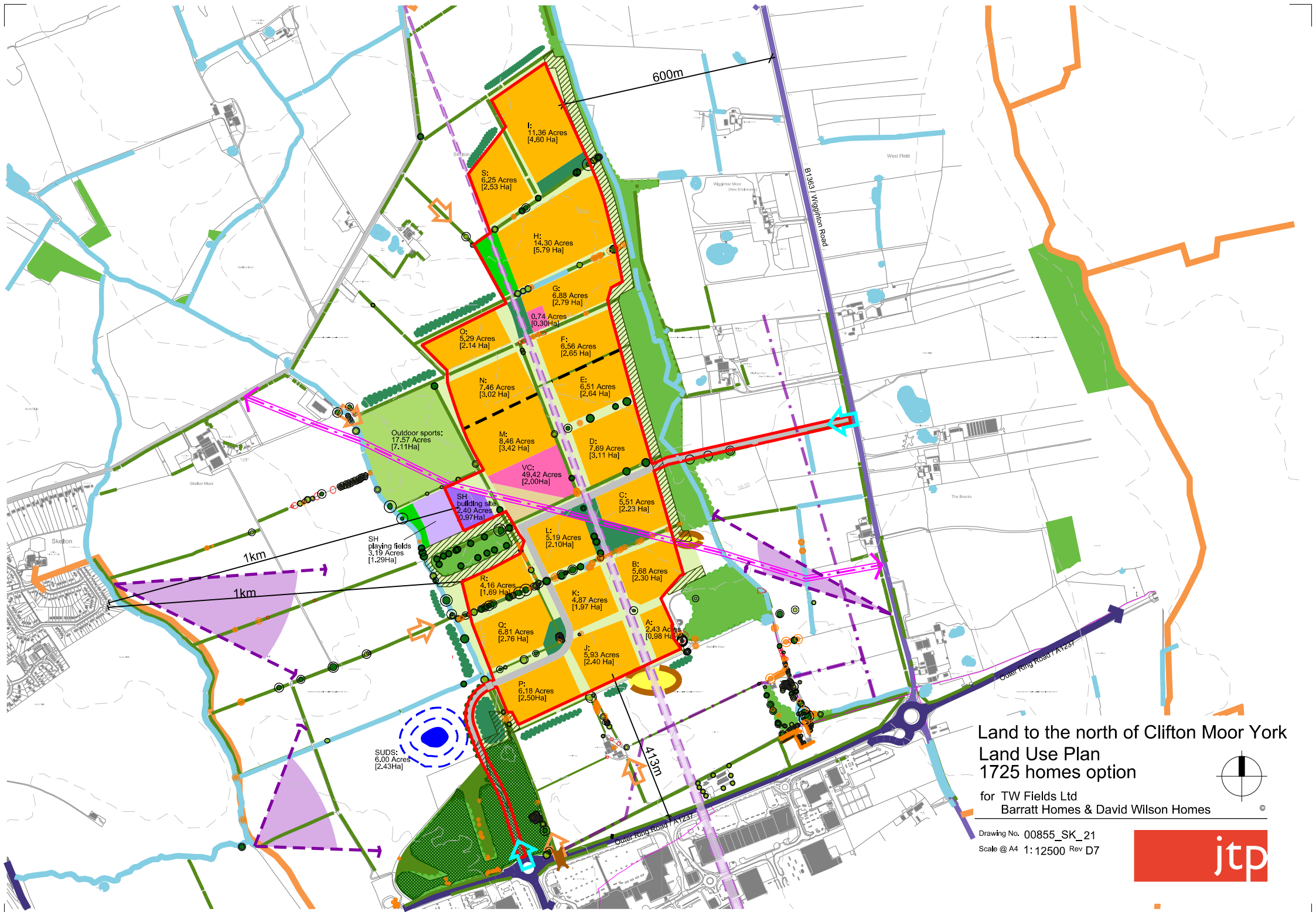


Land use

Land use	Ha	Acres	Notes
Residential	40.02	98.89	
Mixed use [Independent living and apartments]	2.30	5.68	96 Homes plus village shops, community facilities and pub.
Primary school	2.26	5.58	
Open spaces	16.52	40.82	
Primary vehicular route	4.26	10.53	
Gross area	65.36	161.51	

Housing density in developable areas

Developable areas	Parcel	Ha	Acres	Density [dph]	No. of homes
Residential	A	0.90	2.22	20	18
	B	1.85	4.57	30	56
	C	2.13	5.26	35	75
	D	2.85	7.04	40	114
	E	2.23	5.51	35	78
	F	2.39	5.91	35	84
	G	2.79	6.89	30	84
	H	4.10	10.13	25	103
	I	2.88	7.12	20	58
	J	1.80	4.45	30	54
	K	1.58	3.90	35	55
	L	1.98	4.89	35	69
	M	3.42	8.45	40	137
	N	3.10	7.66	35	109
	O	1.55	3.83	20	31
	P	1.49	3.68	30	45
	Q	1.81	4.47	35	63
	R	1.17	2.89	20	23
	Total	40.02	98.89	31.33	1254
Mixed use [Independent living and apartments]		2.3	5.68		96
Total		42.32	104.57		1350



Land to the north of Clifton Moor York
 Land Use Plan
 1725 homes option

























for TW Fields Ltd
 Barratt Homes & David Wilson Homes

Drawing No. 00855_SK_21
 Scale @ A4 1:12500 Rev D7



KEYS

Constraints

-  Site boundary
-  Contour lines
-  Existing streams or ponds
-  Existing woodlands surrounding the site (outline representing canopy)
-  Existing woodlands within the site (outline representing canopy)
-  Designated woodlands - SINC (Site of Importance for Nature Conservation)
-  30m buffer to historic woodlands
-  Existing Category A trees To be Retained (RPA shown with a circle)
-  Existing Category B trees May or May not be Retained (RPA shown with a circle)
-  Existing Category C trees May or may not be retained- TBC (RPA shown with a circle)
-  Existing dead/dying trees To be removed
-  Existing hedgerows Could be removed - TBC
-  Existing important hedgerow corridors (8m) To be retained
-  Areas of potential archaeological interest
-  Emergency Water main with 7.5 m wide easement on each side
-  Overhead electric services
-  Existing buildings
-  Existing A roads (Key vehicular routes)
-  Existing B roads
-  Other important vehicular routes
-  Potential vehicular access into site
-  Potential pedestrain access into site
-  Existing PROWs (Public Rights of Way) and bridleways
-  Existing Key view corridors

Land use

-  Residential
-  Primary school-building site
-  Primary school-playing fields
-  Mixed-use
-  Open space with play areas
-  Outdoor Sports
-  Allotments
-  Other green/open space
-  Primary vehicular route
-  Proposed structural woodland
-  Proposed cycle and footbridge [Indictive location]
-  Indictive SUDS location
-  Proposed trees [Indictive]

Land to the north of Clifton Moor York Land Use Plan

Keys

for TW Fields Ltd
Barratt Homes & David Wilson Homes



Drawing No. 00855_SK_
Scale @ A4 Rev -



Land to the north of Clifton Moor

Schedules

27.10.17

1725 Homes Option

Refer to 00855_SK21_D7_Land use plan_1725 homes option _A4

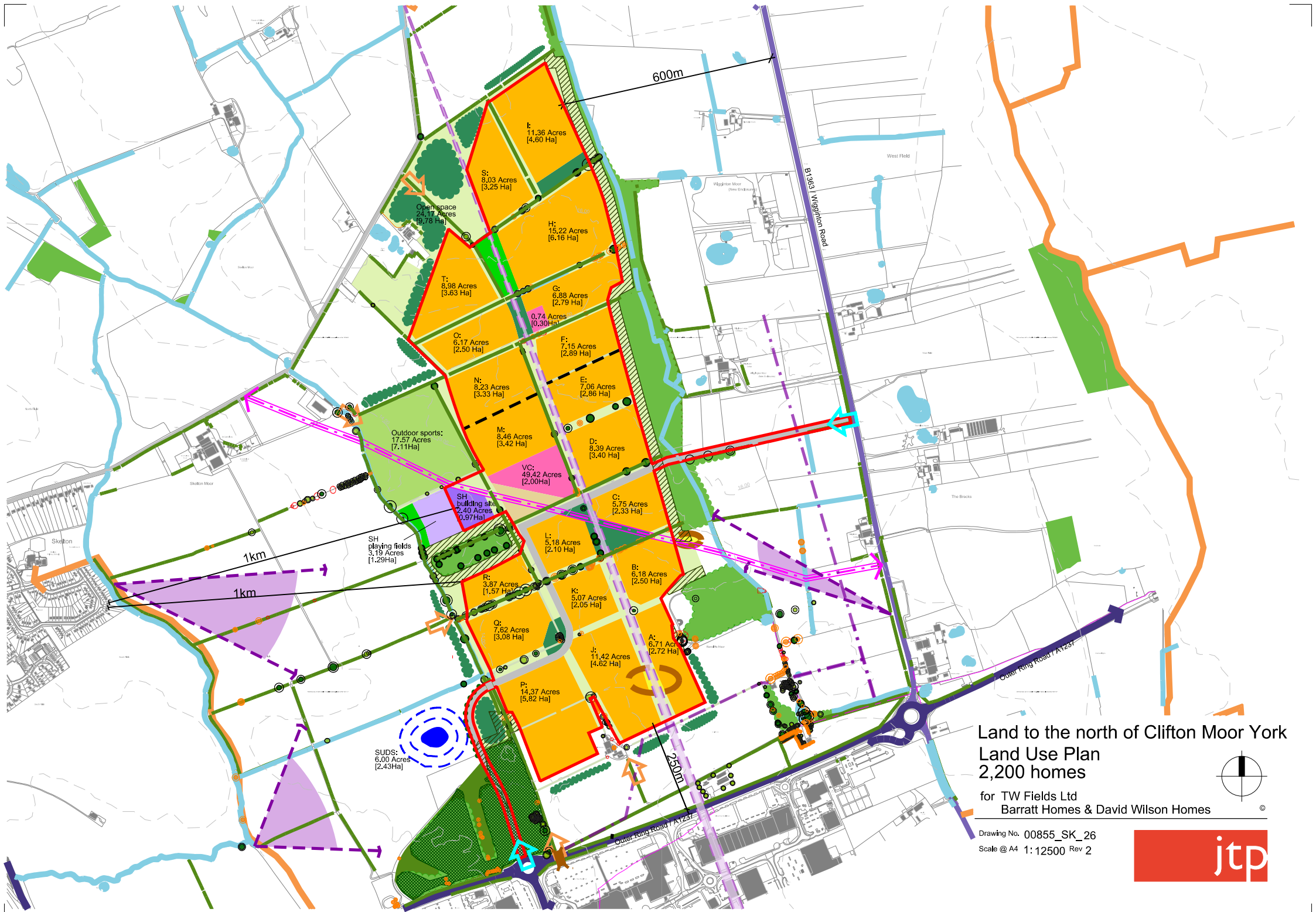


Land use

Land use	Ha	Acres	Notes
Residential	51.62	127.52	
Mixed use [Independent living and apartments]	2.3	5.68	96 Homes plus village shops, community facilities and pub.
Primary school	2.26	5.58	
Open spaces	17.12	42.30	
Primary vehicular route	4.26	10.53	
Gross area	77.56	191.65	

Housing density in developable areas

Developable areas	Parcel	Ha	Acres	Density [dph]	No. of homes
Residential	A	0.98	2.43	25	25
	B	2.30	5.68	30	69
	C	2.23	5.51	35	78
	D	3.11	7.69	40	124
	E	2.64	6.51	35	92
	F	2.65	6.56	35	93
	G	2.79	6.88	30	84
	H	5.79	14.30	30	174
	I	4.60	11.36	20	92
	J	2.40	5.93	30	72
	K	1.97	4.87	35	69
	L	2.10	5.19	35	74
	M	3.42	8.46	40	137
	N	3.02	7.46	35	106
	O	2.14	5.29	30	64
	P	2.50	6.18	35	88
	Q	2.76	6.81	35	97
R	1.69	4.16	25	42	
S	2.53	6.25	20	51	
	Total	51.62	127.52	31.55	1629
Mixed use [Independent living and apartments]		2.3	5.68		96
Total		53.92	133.24		1725



Land to the north of Clifton Moor York
 Land Use Plan
 2,200 homes

























for TW Fields Ltd
 Barratt Homes & David Wilson Homes

Drawing No. 00855_SK_26
 Scale @ A4 1:12500 Rev 2



KEYS

Constraints

-  Site boundary
-  Contour lines
-  Existing streams or ponds
-  Existing woodlands surrounding the site (outline representing canopy)
-  Existing woodlands within the site (outline representing canopy)
-  Designated woodlands - SINC (Site of Importance for Nature Conservation)
-  30m buffer to historic woodlands
-  Existing Category A trees To be Retained (RPA shown with a circle)
-  Existing Category B trees May or May not be Retained (RPA shown with a circle)
-  Existing Category C trees May or may not be retained- TBC (RPA shown with a circle)
-  Existing dead/dying trees To be removed
-  Existing hedgerows Could be removed - TBC
-  Existing important hedgerow corridors (8m) To be retained
-  Areas of potential archaeological interest
-  Emergency Water main with 7.5 m wide easement on each side
-  Overhead electric services
-  Existing buildings
-  Existing A roads (Key vehicular routes)
-  Existing B roads
-  Other important vehicular routes
-  Potential vehicular access into site
-  Potential pedestrain access into site
-  Existing PROWs (Public Rights of Way) and bridleways
-  Existing Key view corridors

Land use

-  Residential
-  Primary school-building site
-  Primary school-playing fields
-  Mixed-use
-  Open space with play areas
-  Outdoor Sports
-  Allotments
-  Other green/open space
-  Primary vehicular route
-  Proposed structural woodland
-  Proposed cycle and footbridge [Indictive location]
-  Indictive SUDS location
-  Proposed trees [Indictive]

Land to the north of Clifton Moor York Land Use Plan

Keys

for TW Fields Ltd
Barratt Homes & David Wilson Homes



Drawing No. 00855_SK_
Scale @ A4 Rev -



Land to the north of Clifton Moor

Schedules

27.10.17

2,200 Homes Option

Refer to 00855_SK26_Land use plan_2,200 homes_D2



Land use

Land uses	Ha	Acres	Notes
Residential	65.62	162.10	
Mixed use [Independent living and apartments]	2.3	5.68	96 Homes plus village shops, community facilities and pub.
Primary school	2.26	5.58	
Open spaces	27.09	66.94	
Primary vehicular route	4.26	10.53	
Gross area	101.53	250.89	

Housing density in developable areas

Developable areas	Parcels	Ha	Acres	Density [dph]	No. of homes
Residential	A	2.72	6.71	30	82
	B	2.50	6.18	35	88
	C	2.33	5.75	35	82
	D	3.40	8.39	40	136
	E	2.86	7.06	35	100
	F	2.89	7.15	35	101
	G	2.79	6.88	35	98
	H	6.16	15.22	30	185
	I	4.60	11.36	20	92
	J	4.62	11.42	35	162
	K	2.05	5.07	35	72
	L	2.10	5.18	40	84
	M	3.42	8.46	40	137
	N	3.33	8.23	35	117
	O	2.50	6.17	30	75
	P	5.82	14.37	35	204
	Q	3.08	7.62	35	108
	R	1.57	3.87	30	47
	S	3.25	8.03	20	65
	T	3.63	8.98	20	73
Total		65.62	162.10	32.07	2104
Mixed use [Independent living and apartments]		2.3	5.68		96
Total		67.92	167.83		2200

Introduction

This statement of the archaeology present within the site designated 'Land to the north of Clifton Moor, York' is based on the YAT archaeological investigations conducted in 2014, centred on NGR SE 58643 56300. The 2014 work covered a wider study area than that currently proposed and the results were presented in YAT 2014/65 'Archaeological Investigations at Clifton Gate, York'. This statement concerns only those areas within the current draft Masterplan.

Investigation Methodology

The Masterplan identifies 3 main land use zones: 'residential/mixed use', 'open space/school' and 'SUDS/road'.

The majority of the proposed site was subject to geophysical survey, with the exception of residential area I (beyond the original study area boundary), and the fields identified as 'open space'.

Using the geophysical survey results and the LiDAR data, a programme of trial trenching and boreholes was implemented. Each trench was 100m² in area, measuring 50m X 2m, and the boreholes were all drilled to a depth of c.3m BGL/c.10.5m AOD max.

The area identified for residential use was investigated with 48 trenches and 4 boreholes. Residential area I was not within the study area and was not investigated. The area identified for open space was investigated with 6 trenches. The area identified for SUDS use was investigated with 7 trenches and 6 boreholes.

Archaeological Background

The archaeological background to the site was presented in YAT 2014/65 (section 4 pp2-4). In brief, evidence for Prehistoric settlement and Prehistoric, Roman and Medieval agricultural activity was known from across the site, evidenced by aerial photographs, excavation, and records in York's Historic Environment Record (HER).

The main source of information was the 1996 excavation of the route of a Yorkshire Water Pipeline that runs across the site. Immediately to the east of Residential Area B an important group of Iron Age roundhouse and enclosure ditches was discovered, producing a regionally significant pottery assemblage.

Summary of 2014 results

Archaeological remains were observed across the majority of the proposal area. Archaeological deposits were encountered between the base of the topsoil at c.300mm below ground level and the top of geological deposits at c.500mm below ground level.

Archaeological activity consisted of Iron Age and Roman boundary, settlement and field systems. These were evidenced by ditches, gullies, pits and post holes that produced pottery and other datable material along with environmental data in the form of seeds, charcoal and other plant remains. These features were overlain by the remains of medieval cultivation, evidenced by furrows

identified following removal of the topsoil. Post-medieval activity related to the on-going agricultural regime and consisted mainly of field drainage.

Results by proposed land use

Residential

The areas identified for residential use were all investigated with the exception of area I, which was then beyond the 2014 study area boundary. These areas include an area designated as 'Mixed Use'.

The whole residential area contained archaeology from all the periods identified across the site. In particular, three 'areas of interest' were allocated in YAT 2014/65 as being of particular potential interest (sections 5.7 pp 11-18 and 5.10 pp 30-33).

It should be noted that the 2014 works were of a scope sufficient to establish baseline conditions for environmental impact assessment and that further archaeological remains are likely to be present across the site. Additionally, archaeology is not limited to the 'areas of interest', although these areas cover the most substantial remains.

Area of Interest 1 (YAT 2014/65 section 5.7.1 pp 12-14) covers **Residential Areas E, F, G, N and O**. In this area, successive field systems of possible Iron Age and Roman date were observed. The Roman field systems developed over time and changed orientation, suggesting a continuity of occupation. In addition, settlement activity in the form of probable roundhouse ditches was identified; again, there was evidence for this originating in the Iron Age and continuing into the Roman period. This activity probably relates to a possible trackway running through Area 1.

Area of Interest 2 (YAT 2014/65 section 5.7.2 pp 14-16) covers **Residential Areas D, E and M** and also **Mixed-Use Area VC**. In this area, settlement activity of Roman date was suggested by ditches and possible disturbed funerary material in the form of charcoal-rich material, pottery and a fragment of glass bangle usually associated with burials. No human burials or disturbed bone were identified but it is possible that such remains may lie close by. In addition, the pottery assemblage also supported the interpretation of Roman settlement over a period of time, with possible earlier Iron Age activity in the vicinity.

Area of Interest 3 (YAT 2014/65 section 5.7.3 pp 16-18) covers **Residential Areas B, C, K, L, Q and R**. In this area, evidence for Prehistoric activity in the form of Iron Age settlement was evidenced by a large boundary ditch and ring gully feature, along with a gully, a pit and a group of possible postholes. These features were dated by pottery and lie near to the Iron Age settlement identified in the 1996 excavation for the Yorkshire Water pipeline.

Boreholes were located in **Residential Area R**. These confirmed the identification of natural geological deposits and did not identify any buried land surfaces or former water courses.

Open Space

The areas identified for use as open space were all investigated in 2014 and include an area designated for a Primary School and its playing fields.

These areas contain little identified archaeology save an undated gully and pit in the 'Outdoor Sports' area. However, it should be noted that the archaeological investigation was of a scope sufficient to establish baseline conditions for environmental impact assessment and that further archaeological remains may be present across the site.

SUDS/Roads

The large field identified as the location of the SUDS was investigated in 2014. The proposed main access road runs through this field. This road also emerges at the eastern edge of the proposed development; this area was not investigated in 2014.

The archaeology of the SUDS area consists of Medieval cultivation in the form of ridge and furrow. The boreholes through this area confirmed the identification of natural geological deposits and did not identify any buried earlier land surfaces or former water courses.

As above, it should be noted that the archaeological investigation was of a scope sufficient to establish baseline conditions for environmental impact assessment and that further archaeological remains may be present in these areas. In particular, the road runs through the remains of the runway associated with the Second World War airfield known as RAF Clifton Moor. Other remains of this airfield survive in the existing plantations that are not impacted by the development proposals.

Significance

The archaeology has been affected by ploughing and extensive drainage systems across the site. Our opinion, supported by the City of York Archaeologist, is that there are no features or deposits identified in the evaluation exercise whose significance merits preservation in-situ.

The archaeology present within the proposal site has the potential to enhance understanding of York's prehistory, and also the hinterland of Roman York (Eboracum), in particular the agricultural activities that were taking place within the countryside surrounding the fortress and civilian settlement. The City of York Archaeologist has suggested that the impact of the development on this archaeology can be mitigated through an archaeological excavation and recording exercise.

The City Archaeologist has indicated that no further evaluation is necessary to inform an EIA, but it may be prudent to consider further evaluation in both the 'areas of interest' and the areas currently regarded as containing little archaeology in order to manage cost and programme risk. Additionally, there are opportunities for community engagement and outreach, both through direct involvement with archaeological work and through public lectures/press releases and publication.

TW Fields / Barratt David Wilson Homes
Clifton Gate, York

Outline Transport Strategy Report

7 September 2016
Version 1.0
Issue



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1 Introduction

1.1 Commission

Fore Consulting Limited (Fore) has been commissioned by TW Fields and Barratt David Wilson Homes (The Developer) to provide advice in relation to the transport and access issues associated with a site at Clifton Gate, York for a development of up to 1,725 residential dwellings which is being promoted through the City of York Council (CoYC) Local Plan process.

The purpose of this report is to address the access and connectivity issues that will need to be considered in relation to the allocation.

1.2 The Allocation Site

The draft allocation site is referenced as site ST14 in CoYC's Preferred Sites Consultation document. It comprises around 55 hectares of land to the north of the A1237 Outer Ring Road at Clifton Moor, located approximately 5.0km to the north west of York city centre.

1.3 Structure of this Report

This report is set out as follows:

- Chapter 2 describes the existing transport network in the vicinity of the allocation site.
- Chapter 3 summarises the allocation proposals and access arrangements.
- Chapter 4 considers the likely transport impacts of the allocation and sets out an outline transport strategy to be refined as the proposals are further developed.
- Chapter 5 provides a summary of the report.

2 Existing Situation

2.1 Highway Network

The highway network in the vicinity of the site comprises a number of key links and junctions, as follows:

- The A1237 Outer Ring Road, which provides strategic connections around the north and west of the City of York. The route is of single carriageway standard although additional lanes are provided on the approaches and exits at roundabout junctions along the route. In the vicinity of the allocation site the A1237 Outer Ring Road is subject to the national speed limit.
- The B1363 Wigginton Road provides a link from York city centre to the A1237 Outer Ring Road and beyond to the rural hinterland north of York. North of the A1237 Outer Ring Road junction, Wigginton Road includes a single carriageway, typically between 6.0m and 6.5m in width and subject to the national speed limit.
- Clifton Moor Gate provides access between the A1237 Outer Ring Road and the retail parks, leisure uses and industrial estates in the Clifton Moor area, connecting to a junction with the B1363 Wigginton Road. South of the A1237 Outer Ring Road, the road is a dual carriageway as far as a roundabout junction with Stirling Road (a section of around 200m in length). A signal-controlled junction with Hurricane Way immediately north of the Stirling Road roundabout, provides access to retail units west of Clifton Moor Gate.
- The A1237 Outer Ring Road / Clifton Moor Gate is a priority-controlled roundabout junction. In effect the operation of the junction is linked with the signal-controlled Clifton Moor Gate / Hurricane Way junction, located around 120m to the south. Right-turning movements from Hurricane Way to Clifton Moor Gate are not accommodated by the junction layout; these movements are directed around the A1237 Outer Ring Road roundabout to Clifton Moor Gate.
- The A1237 Outer Ring Road / Wigginton Road / Stirling Road junction is a 5-arm priority-controlled roundabout junction, accommodating turning movements between the strategic A1237 Outer Ring Road and Wigginton Road routes, as well as local access to Clifton Moor via Stirling Road.
- The Clifton Moor Gate / Stirling Road roundabout is a 5-arm priority controlled roundabout. The junction provides local access to the Clifton Moor retail park located immediately to the east, Stirling Road (for access to other retail, leisure, and industrial premises) and access to residential areas via Longwood Road to the west.

2.2 Public Transport

2.2.1 Bus Network

Bus stops are currently provided on Wigginton Road, adjacent the allocation site, providing connections to local bus services, as summarised below.

- 20, operated by Transdev and providing hourly orbital connections on weekdays and Saturdays between Acomb, Poppleton, Clifton Moor, Wigginton, Haxby, Huntington, Osbaldwick and York University. Saturday services operate between Clifton Moor and York University only.
- 40, operated by Reliance Motor Services, providing hourly connections between Easingwold, Wigginton, York District Hospital and York city centre via the Wigginton Road corridor on weekdays and Saturdays. On Sundays, a two-hourly frequency is operated.
- M15, providing a daily return journey from York city centre to Helmsley via Shipton and Easingwold. Services are operated on Sundays and Bank Holidays only, on a seasonal basis between the end of March and the end of October.

In addition, a number of other bus services currently operate in the vicinity of the site, as follows:

- 6, operated by First Group, and providing a high-frequency service on weekdays and Saturdays from Clifton Moor to Osbaldwick via the city centre. Services are routed via residential areas in Clifton Moor and Rawcliffe, towards York District Hospital and city centre via the Wigginton Road corridor. A half-hourly service frequency is operated on Sundays. Services commence and terminate within the Clifton Moor retail park, to the south of the allocation site.
- 19 service, operated by Reliance Motor Services, providing hourly connections during the daytime between Skelton and York city centre via the A19 Shipton Road corridor.
- 29 / 31 / 31X services operated by Stephenson's of Easingwold combine to provide up to two services per hour via the A19 Shipton Road corridor between York city centre and Easingwold, with a small number of services extended to Helmsley. Services operate on weekdays and Saturdays only.
- 30 / 30X services operated by Reliance Motor Services provide additional connections between Thirsk and York city centre via the A19 Shipton Road corridor. The service frequency is irregular, but approximately hourly during the daytime on weekdays and Saturdays, reducing to every two hours on Sundays.

- 58, providing two daily return services on college days only between Thirsk, Shipton, Askham Bryan college, York college and York city centre. One service per day is extended to Northallerton.

2.2.2 Park and Ride

The Rawcliffe Bar Park and Ride site is located approximately 1.5km south-west of the site, immediately adjacent the A1237 Outer Ring Road / A19 Shipton Road roundabout junction. The site provides 1,000 car parking spaces, with direct high frequency bus connections to the city centre via service 2, operated by First Group.

CoYC have previously developed proposals for an additional Park and Ride site at Clifton Moor, which formed part of a wider package of transport measures known as Access York Phase 1. The site was located south of the A1237 Outer Ring Road / B1363 Wigginton Road junction, and provided 500 parking spaces (with scope for extension to 600), with bus priority measures identified along the B1363 Wigginton Road. A bid for Major Scheme funding was submitted to the Department for Transport in 2009. However, the Clifton Moor Park and Ride element was not included in the Funding Bid subsequently approved by DfT in November 2011. The current status of the scheme is unknown.

2.2.3 Rail Network

The site is not served directly by the rail network. The closest rail station is York, which is an important station on the national railway network and is served by a range of local, regional and national mainline services. Bus services operating in the vicinity of the allocation site provide public transport links to the city centre, although a walking distance is typically required to as part of an interchange to rail services.

2.3 Pedestrian and Cycle Facilities

The existing pedestrian and cycle route network in the vicinity of the site includes the following:

- A shared off-road footway / cycleway adjacent Clifton Moor Gate, south of Hurricane Way, providing connections to the strategic orbital cycle round around the city centre via Water Lane or Rawcliffe Lane.
- Uncontrolled crossings are provided at the A1237 Outer Ring Road / Wigginton Road junction, providing links to the pedestrian and cycle route along Stirling Road to Haxby Road adjacent the A1237 Outer Ring Road.

- A shared off-road footway / cycleway adjacent Hurricane Way and Manor Lane link to off and on-road cycle links adjacent the A19 Shipton Road, as well as the strategic National Cycle Network Route 65 (adjacent the River Ouse).
- A grade-separated crossing provides safe links for pedestrians and cyclists under the A1237 Outer Ring Road via the A19 Shipton Road, east of the roundabout junction. At-grade uncontrolled crossings are also provided at the junction, accommodating east-west pedestrian and cycle routes via an off-road shared footway / cycleway adjacent the Outer Ring Road.

3 Development Proposals

3.1 Proposed Land Uses

The proposals comprise a sustainable urban extension with local facilities, social infrastructure and convenience retail in accordance with the planning principles set out for site ST14 in CoYC's Local Plan Preferred Sites Consultation document, as follows:

- Creation of a new 'garden' village that reflects the existing urban form of the main York urban area as a compact city surrounded by villages.
- Create a Local Centre incorporating appropriate shops, services and community facilities to meet the needs of future residents.
- Deliver on site accessible combined nursery and primary education facilities, which are well connected to housing by dedicated pedestrian/ cycleways.

For the purposes of this assessment, the following indicative development scenarios have been considered:

- 1,350 dwellings, in accordance with with the indicative capacity for site ST14 set out in CoYC's Preferred Sites Consultation document.
- 1,725 dwellings, representing delivery of additional dwellings at a higher density which is considered to be achievable.

3.2 Proposed Access Arrangements

To ensure efficient operation of the local highway network (for instance, during a possible emergency), CoYC's Highway Design Guide indicates that 400 dwellings represents the maximum number of dwellings considered appropriate to be served from one point of access on the external highway network.

Consequently, vehicular access will be taken from two points on the wider highway network, as follows:

- The A1237 Outer Ring Road / Clifton Moor Gate roundabout. A fourth arm would be provide to access the development to the north. The feasibility of providing a new grade-separated pedestrian and cycle access will also be investigated at this location. Given land ownership constraints to the south, it is likely that the Clifton Moor Gate junction and the Outer Ring Road approaches will need to be realigned to the north to ensure a comprehensive junction upgrade, including access for non-motorised users, can be delivered.

- The B1363 Wigginton Road. A new priority-controlled junction will be provided approximately 800m north of the junction with the A1237 Outer Ring Road.

Indicative preliminary layouts have been developed as part of previous assessment work undertaken in respect of the proposed ST14 allocation. The Developer controls the necessary land in the vicinity of the works, and therefore the likely changes to the highway network needed to accommodate satisfactory vehicular access (as well as access by public transport, cycle and on foot) are considered to be deliverable.

4 Strategic Impacts and Outline Transport Strategy

4.1 Approach of the Outline Transport Strategy

To ensure the long-term sustainability of the site, it is vital that the existing retail, leisure facilities and employment in the Clifton Moor area, the wider surroundings and the city centre are genuinely accessible from the site by modes other than the private car.

The overriding approach is to achieve this through the following measures:

- **High quality walking and cycling infrastructure.** Convenient connections for walking and cycling trips to the wider networks will be a vital component of the transport strategy. The aim will be to maximise the proportion of trips to be made on foot or by cycle, thereby minimising trips by motorised modes (including the private car). Access to the north and east (Wigginton and Haxby) as well as to the south and west (Clifton Moor and the City Centre) considered to maximise the connectivity of the site.
- **Effective management and promotion of sustainable travel options** through comprehensive travel planning that will be implemented as part of the development. This will include a robust framework for identifying targets, and monitoring progress to ensure targets are achieved.
- **Thoughtful master planning** to make provision for convenient and high quality walking, cycling and public transport routes within the site. This would also include careful consideration of appropriate levels of car parking to be provided.

Having regard to the overriding approach set out above, a high-level strategic assessment of the likely transport impacts associated with the emerging allocation proposals has been undertaken. The initial assessment and measures to be considered in further detail at the appropriate stage are discussed in further detail in the following sections.

4.2 Walking and Cycling Networks

4.2.1 Existing Accessibility

A wide range of amenities and destinations are located within a walking distance of 2.0km from the allocation site, representing the maximum distance that people are prepared to walk before reverting to motorised forms of travel. These facilities include the existing wide range of retail and leisure uses within and adjacent to the Clifton Moor retail parks, plus employment uses at Clifton Moor industrial estate and business park.

In addition, existing footways and cycleways provide further connections to strategic pedestrian and cycle routes through the City of York (including the city centre), along Water Lane or Rawcliffe Lane via the existing city centre orbital route. Existing connections are also available to off and on-road cycle links adjacent the A19 Shipton Road and the strategic National Cycle Network Route 65 adjacent the River Ouse. The city centre is located a distance of less than 5.0km from the site, which represents a distance that future residents would be prepared to cycle for commuting purposes.

4.2.2 Outline Strategy

The allocation site is well located to encourage trips to adjacent existing retail, leisure facilities and employment in the Clifton Moor area, the wider surroundings and the city centre on foot or by cycle. Accordingly, the following measures will be considered in further detail as part of the transport strategy for the development:

- Provision of high quality, safe and convenient walking and cycling routes permeating through the allocation site. This will be considered fully as part of the detailed master planning of the development.
- Safe, convenient and direct links to the network of pedestrian and cycle routes in the wider Clifton Moor area will be provided. This will include a new bridge for pedestrians and cyclists over the A1237 Outer Ring Road, plus new footways and cycleways to link to existing routes.

4.3 Public Transport

4.3.1 Existing Accessibility

The existing accessibility of the site by public transport service is identified at section 2.2. Currently, the site is served by relatively infrequent bus services operating along the B1363 Wigginton Road and A19 Shipton Road corridors, providing direct connections to York city centre as well as orbital connections around the City.

The Rawcliffe Bar Park & Ride site offers further public transport options, but is not within a convenient walking distance from the allocation site.

It is recognised that the existing public transport accessibility of the site is unlikely to adequately support the proposed allocation and, as such, public transport connections will need to be enhanced in the emerging transport strategy.

4.3.2 Outline Strategy

A number of options have been initially considered to improve public transport access to the site. These include introduction of shuttle services to the Rawcliffe Bar Park & Ride site, diversions or extensions to existing bus routes. However, it is likely that the introduction of new standalone services represents the most appropriate and realistic option to serve the allocation site adequately. To facilitate this in a flexible manner, the layout of the site will be designed such that a bus route will be accommodated through the site between the A1237 Outer Ring Road and Wigginton Road access points.

The development is of a quantum that will potentially be sufficient to commercially sustain a bus service 30-minute frequency between the site and the city centre in the long term. However, financial support will be required to ‘pump-prime’ (in effect, subsidising the operating costs of) bus services during initial phases of development. This will be required to ensure that the site is accessible by public transport from the outset, such that sustainable travel behaviour can be established from an early stage.

4.4 Highway Network

4.4.1 Vehicle Access

B1363 Wigginton Road

A preliminary assessment of the feasibility of providing a new access from Wigginton Road, serving the residential development has been undertaken. The scale and form of the access road and junction will need to be considered in detail given the interactions with A1237 Outer Ring Road junction and the existing Clifton Gate Business Park access junctions. However, at this stage it is considered that a new access road and associated junction could potentially be safely and efficiently accommodated approximately 800m north of the existing A1237 Outer Ring Road / B1363 Wigginton Road roundabout junction.

Clifton Moor Gate

The allocation would also be accessed via a fourth arm on the existing A1237 Outer Ring Road / Clifton Moor Gate junction. Changes to this junction will need to be carefully considered to take account of CoYC’s long-term aspirations to upgrade the A1237 Outer Ring Road, potentially incorporating grade separation of pedestrian and cycle connections. Impacts on the junctions with Hurricane Way and Stirling Road will also need to be considered in detail, given the close proximity.

The location, scale and form of the proposed access arrangements, as well as details of the potential phasing will need to be confirmed following collection of traffic data and detailed assessment, and discussion and agreement with CoYC. However, the Developer controls the necessary land to deliver the likely scope of works and, as such, a satisfactory means of access is considered to be deliverable.

4.4.2 Off-Site Impacts

Based on the estimated development traffic flows, strategic impacts are likely to occur at the following key junctions on the local highway network:

- A1237 Outer Ring Road / Wigginton Road junction. The junction will form part of the principal access routes to the site from the A1237 Outer Ring Road to the east, as well as Wigginton Road to the south. Potential changes would need to take account of CoYC's aspirations to upgrade the A1237 Outer Ring Road, as well as retaining access to the existing Clifton Gate Business Park (located east of Wigginton Road).
- A1237 Outer Ring Road / A19 Shipton Road junction. Similarly, this junction will form a part of the principal strategic access route to the allocation site from the A1237 Outer Ring Road to the west, as well as from the city centre via the A19 corridor. Capacity upgrade works at the junction were completed in 2012, and based on discussion with CoYC to date it is understood that further works to increase capacity at the junction are likely to require land outside the current highway boundary.
- Traffic associated with the full allocation is likely to result in impacts on most junctions on the A1237 Outer Ring Road, including Great North Way, the A59 Poppleton Road and the B1224 Wetherby Road to the west of the site, plus Haxby Road, Strensall Road and Monks Cross Link to the east. These impacts are associated with trips to and from locations away from the city centre, typically of a longer distance nature. These trips are usually not readily served by public transport, with a journey distance that would make travelling on foot or by cycle impractical and, as such, the scope to significantly reduce these impacts is limited.

The precise impacts of the allocation on the highway network, as well as the scale, form and phasing of mitigation works considered to be necessary will need to be confirmed at the planning application following collection of traffic data and detailed capacity assessment. The scope and methodology for the necessary work will be discussed and agreed with CoYC at the appropriate stage. However, at this stage it is considered that there are no barriers to allocation of the ST14 site within the Local Plan.

5 Summary

This document has been prepared to guide the promotion of the ST14 site. It considers the strategic access and connectivity implications associated with development of up to 1,725 dwellings, and identifies a potential outline transport strategy.

The allocation site is well located in relation to the existing wide range of retail and leisure uses within and adjacent to the Clifton Moor retail parks, plus employment uses at Clifton Moor industrial estate and business park. To ensure the long-term sustainability of the site, it is vital that the potential for residents to walk or cycle is maximised. Accordingly, high quality, safe and convenient walking and cycling routes permeating through the allocation site will be required. These would link to new crossings on the A1237 Outer Ring Road adjacent the allocation site, and new footways and cycleways to link to the existing network of pedestrian and cycle routes linking to the city centre. To ensure permeability with surrounding areas a bus route will be provided through the site, via the A1237 and Wigginton Road access points, and pedestrian/cycle connections will be delivered to existing connections including a footbridge proposed to link to Clifton Moor.

Vehicle access would be taken from a new junction on the B1363 Wigginton Road, and a fourth arm at the A1237 Outer Ring Road / Clifton Moor Gate roundabout. Changes to the Clifton Moor Gate junction in particular will need to be carefully considered to take account of CoYC's long-term aspirations to upgrade the A1237 Outer Ring Road, and potentially incorporate grade separation of pedestrian and cycle connections. As identified above, the development of the site offers the potential to make land available for the potential future widening of the A1237.

The precise impacts, scale, form and phasing of necessary transport measures and highway works will need to be confirmed following collection of traffic data and detailed capacity assessment work that will be undertaken at the planning application stage. However, overall, **it is considered that there is no reason in terms of transport and access that precludes the ST14 site from being allocated for residential use.**

Clifton Gate, York

Ecology Statement



WHO WE ARE:

Baker Consultants is an ecology and sustainability consultancy. We work in terrestrial, freshwater and marine environments, providing a range of services for industry, government, developers, public services and utilities.

Baker Consultants comprises a highly experienced team of professional ecologists. We do wildlife surveys - but they are only the first steps in the process for most projects. We are also involved in ecological assessment, environmental law, biodiversity management and design planning.

We don't just work with wildlife, because we know that communication with clients, design teams and conservation bodies is the key to project success. Explaining the implications of survey data, and interpreting legislation, policy and practice is one of our strengths. We help decisions to be made and actions taken, allowing constraints to be kept to a minimum and project risks to be managed.

Our approach is scientific, pragmatic and creative. Alongside tried and tested methods we seek to innovate, introduce clients to new ways of thinking and always deliver sound commercial awareness. You will find us honest and approachable, but we're not afraid to be robust and challenging - or to ask difficult questions.

We do believe in nature conservation – none of us fell into this line of work by chance. But we also believe in good development, well delivered. We also know that with our input, projects and plans can provide benefits for both nature and people.

WHAT WE DO:

- Terrestrial, Freshwater and Marine Surveys
- Environmental Impact Assessments
- Appropriate Assessment
- Ecological Appraisals
- Public Exhibitions
- Public Inquiry
- Bioacoustic Survey and Monitoring
- Ecological Design and Mitigation
- SM2 Field Support

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Contact details	c.abrahams@bakerconsultants.co.uk
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	Name	Position	Date
Author	Carlos Abrahams	Technical Director	7 September 2016

Revised

Baker Consultants Ltd.
Cromford Station
Cromford Bridge
Matlock
Derbyshire DE4 5JJ
info@bakerconsultants.co.uk
<http://www.bakerconsultants.co.uk>
01629 593958
Company No. 6702156

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Unless otherwise stated in this document, the assessments made assume that the site referred to will continue to be used for its current purpose without significant change. The assessment, recommendations and conclusions contained in this document may be based upon information provided by third parties and upon the assumption that the information is relevant, correct and complete. There has been no independent verification of information obtained from third parties, unless otherwise stated in the report.

Where field investigations have been carried out, these have been restricted to the agreed scope of works and carried out to a level of detail required to achieve the stated objectives of the services. Natural habitats and species distributions may change over time and further data should be sought following any significant delay from the publication of this document.

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1 Introduction

1.1 The Proposed Allocation

1.1.1 As part of the proposals for the latest City of York Council (CYC) Local Plan, an allocation for land is being put forward at “ST14 – Land to the West of Wigginton Road” (also known as Clifton Gate). This allocation currently allows for the delivery of 1348 homes. However, a revised layout plan with more land taken to the west of the allocation area is being proposed by the landowner, to allow the number of homes to be increased to 1725 if needed

1.1.2 The key elements of the illustrative masterplan for the site are as follows:

- the intention to deliver a Garden Village at a gross to net developable area of 60:40, with the 60% net developable area (60ha) being developed at a density of 32dph.
- provision of the opportunity for CYC to deliver any potential increase in housing numbers across the City on a sustainable site, and with increased development benefits associated with the allocation.

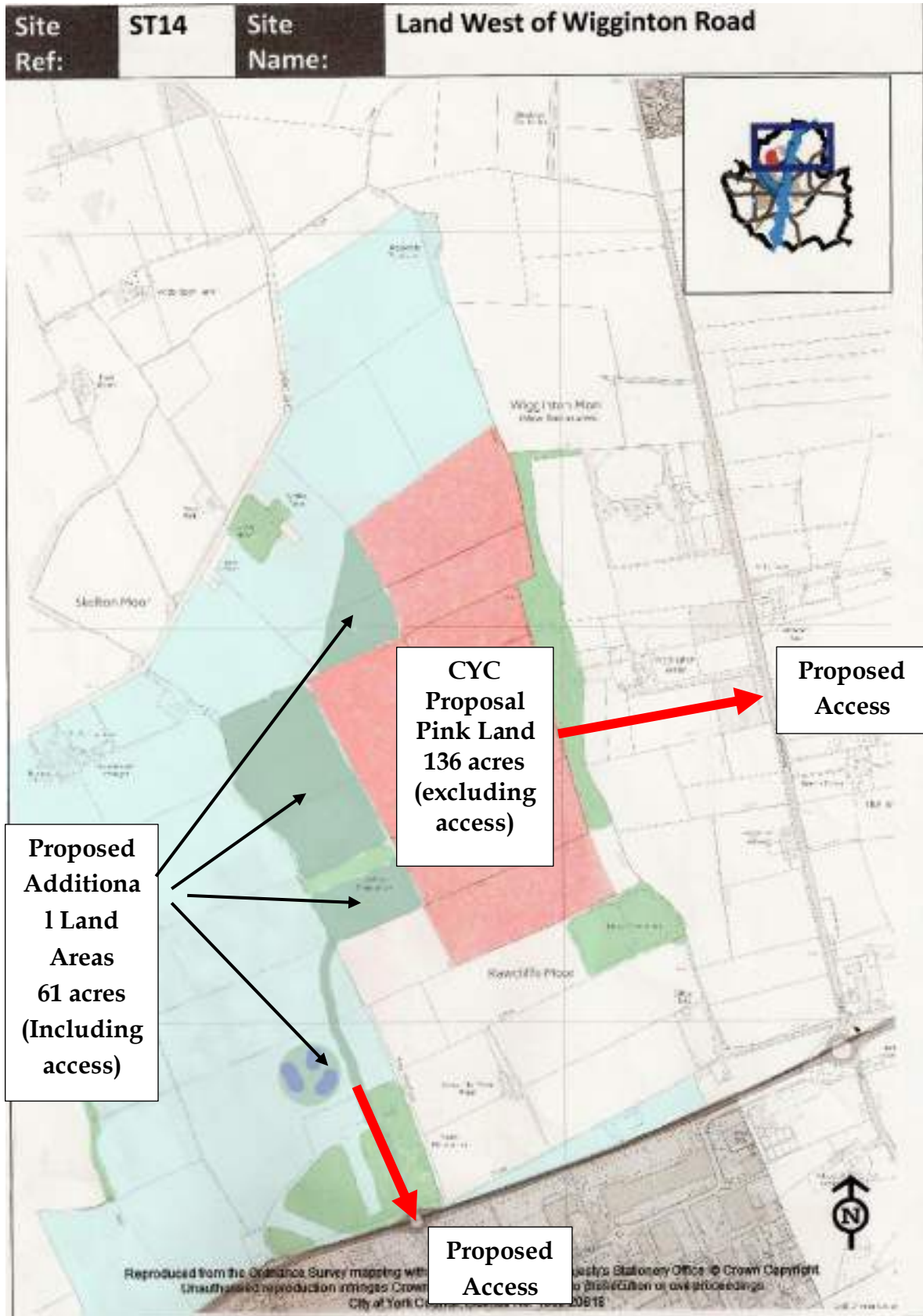
1.1.3 Baker Consultants was commissioned by TW Fields and Barrett David Wilson Homes to complete a suite of ecological surveys of the proposed allocation land at Clifton Gate (henceforth referred to as the ‘Site’). The Site is centred on National Grid Reference SE588563 and its location is shown in Figure 1 below.

1.2 Ecology Statement

1.2.1 This report is intended to accompany written representations in support of the proposed land allocation – in particular relating to the proposed increase in the number of homes to 1725.

1.2.2 The results of ecological studies carried out at the site in 2013-2014 are summarized to provide an understanding of the ecological issues related to the proposed allocation. The likely ecological constraints to allocation are described and any requirements for additional survey and mitigation as part of the planning and development process are highlighted.

Figure 1. Site location. CYC Proposals for Clifton Gate June 2016 shown on Pink Land



2 Baseline Studies

2.1 Study Scope

Baker Consultants was commissioned by the client to complete the following works in relation to the Site:

1. Desk-based study – including written consultation with consultees and interrogation of online databases to identify statutory and non-statutory designated sites of nature conservation importance and records of protected and/or notable species;
2. Phase 1 Habitat survey – to record the nature and extent of vegetation and habitats within and adjacent to the Site;
3. Species-specific surveys for bats, otters, great crested newts, water voles, badgers, breeding birds, wintering birds, reptiles and invertebrates.

2.2 Desk Study

2.2.1 Records of internationally, nationally and locally designated sites, together with records of protected or otherwise notable species, were requested from North East Yorkshire Ecological Data Centre (NEYEDC) in October 2013.

2.2.2 The study area for the data search was defined as being within 3km of the centre of land controlled by the client.

2.3 Extended Phase 1 Habitat Survey

2.3.1 Diana Clark MSc MCIEEM carried out a Phase 1 Habitat Survey of the majority of the Site on the 27th June 2013. Additional areas of land to the north, east and west that are controlled by the client were surveyed on 5th November 2013, thereby adding some level of context to the survey by providing additional information regarding adjacent land area.

2.4 Targeted Species Surveys

2.4.1 Following the Phase 1 Habitat survey, a range of detailed studies took place to ascertain the presence/absence of a range of protected and notable species. This included the surveys listed below in Table 1.

Table 1. Detailed flora and fauna surveys undertaken at Clifton Gate.

Badger survey	November 2013
Winter bird surveys	4 visits in November & December 2013 and January & February 2014
Breeding bird surveys	Three surveys in April, May and June 2014
Botanical survey of the Clifton Airfield SLI	May 2014
Invertebrate survey of Clifton Airfield SLI	Two visits September 2014
Barn owl surveys	April/May 2014
Great crested newt surveys	Surveys during mid-March to mid-June 2014
Reptiles surveys	Surveys during April & May 2014
Bat activity transects & static detector installation	Three transects undertaken on and around the allocation site during April-July 2014. Static detectors placed on and around the site between April-September 2014
Bat roost assessment - visual ground-based surveys of trees and external/internal inspections of buildings	June- July and September 2014
Water voles/otters	Detailed survey of suitable habitat in ditches and ponds in September 2014.

3 Results Summary

3.1 Designated Sites

3.1.1 Two designated Sites of Local Interest (SLIs) lie close to the proposed allocation site. These are Clifton Airfield SLI and Clifton Moor Balancing Ponds SLI. Clifton Airfield has been highlighted by the LPA as being of interest for botanical and invertebrate interest.

3.2 Habitats

3.2.1 The majority of the site comprises typical arable farmland with species-poor hedgerows, but the following Phase 1 habitat types are present locally:

- Arable farmland
- Broadleaved semi-natural woodland
- Dense/continuous scrub
- Intact species-poor hedge
- Defunct species-poor hedge
- Tall ruderal herbs
- Improved grassland

3.3 Bats

3.3.1 There are occasional mature trees (mostly oak and ash) within hedgerows and fields that have some level of bat roost potential. The general quality of foraging habitat for bats across and around the site is considered to be low with occasional areas of better bat habitat along woodland edges.

3.4 Badgers

3.4.1 Badger setts are known to be present in the local area, but suitable habitat is fairly limited with the wooded areas locally providing the best potential.

3.5 Birds

3.5.1 There is breeding bird potential across the site and in the local area within hedges, trees, scrub and woodland. The potential presence of long-eared owls and corn bunting in the area has been highlighted by the County Ecologist.

- 3.5.2 The bird surveys found several areas of habitat on and around the site to be important for breeding and wintering birds. These areas were identified either due to a wide variety of bird species being observed there, several important bird species being found and/or large numbers of individual birds being recorded. Those habitats with the greatest value within the application area include woodland and scrub, hedgerows, grasslands (mostly used by foraging winter visitors) and the ponds locally, which were used by waterfowl for breeding and foraging purposes.
- 3.5.3 In general, the use of the site by birds is typical of lowland farmland in England, with both the species and numbers encountered being broadly typical of this type of landscape.

3.6 Amphibians

- 3.6.1 There are a number of ponds located on and around the site with great crested newt potential, as well as several wet ditches. Surveys have also shown the presence of great crested newts in ponds to the east of the allocation area (but outside it).

3.7 Reptiles

- 3.7.1 Clifton Airfield SLI has habitats providing reptile potential, as do some of the wider arable field margins.

3.8 Invasive Species

- 3.8.1 Several of the woodland areas locally have Himalayan balsam present.

4 Assessment

4.1 Site Assessment

- 4.1.1 The Clifton Gate site provides habitats typical of lowland arable farmland, and the species associated with this type of landscape. Although there are features of nature conservation interest present within the allocation site (and surrounding it), these are mostly in discrete areas of habitat rather than being present across the whole landscape.
- 4.1.2 The main habitat present – arable land – is of low nature conservation interest. The areas of hedgerow, woodland, and scrub are of greater interest and, due to their smaller size can be more easily incorporated into a residential development (and enhanced) as part of retained areas, landscaping and green infrastructure.
- 4.1.3 In terms of protected and notable species, great crested newts are known to be present locally, but are found in ponds outside of the allocation site. Bats and badgers are known to make some use of the site, but due to the dominance of the arable habitat, the levels of activity and population sizes within the area as a whole are expected to be low. A range of breeding and wintering birds is also present – but principally in defined areas of suitable habitat.

4.2 Proposed Allocation

- 4.2.1 None of the ecological features outlined in this report are likely to represent a serious constraint to the development of the site. Appropriate site design and mitigation will be required, as for any project of this size – but the most adverse potential impact, habitat loss, is extremely limited due to the dominant existing arable land-use.
- 4.2.2 Careful scheme design means that a range of hedgerow, woodland and other ecological features will be retained and incorporated into the development and, in some cases, enhanced. For example, the proposed access road to the south passes through Clifton Airfield SLI, but makes use of an existing trackway to minimise any potential for ecological impacts.
- 4.2.3 The proposed variation in the number of residential units (1348 or 1725) is unlikely to make any significant difference to the level of ecological impact at the site. With either scheme, areas of valuable habitat will be able to be retained and suitable

mitigation and enhancement provided. More important will be the suitable incorporation of ecological design principles into masterplanning and detailed site layouts, appropriate protection measures during construction, and the long-term landscape and ecological management of the site post-construction. This can be equally well delivered with either a 1348 or 1725 home scheme.

4.3 Conclusion

- 4.3.1 The overview of ecological issues provided above sets out the ecological interest of the proposed allocation site. Although there are issues that would need to be dealt with during planning and construction of the site, these are reasonably standard for a development of this size and would be covered as part of the normal planning process. There is no significant ecological reason why the site should not be allocated for up to 1725 homes.



baker *consultants*

Subject CYC Local Plan Preferred Sites Consultation

Date 1 September 2016

Job No/Ref 601971-40

Supporting Information: Response to City of York Local Plan Preferred Sites Consultation

1.1 Overview

The following note review the potential implications of revisions to the former Clifton Moor site within the Local Plan Preferred Sites Consultation (2016). Initially, the note compares the different scales of development that have previously been proposed at the site. The remainder assesses the likely implications of the proposed change in the size of the site and the quantum of development on Air Quality, Noise and Vibration, Flood Risk and Drainage, Geotechnical and Utilities.

1.2 Context

Table 1 below sets out how the quantum of development has changed since 2014. In 2014, Arup prepared an Environmental Statement which assessed the implications of 2,800 dwellings on Air Quality, Noise and Vibration, Flood Risk and Drainage, Geotechnical and Utilities. However, through various iterations of the City of York Local Plan, the size and form of the proposed site and quantum of development have changed.

	Proposed Quantum of Development	Size of the Site
Original Environmental Statement completed by Arup	Approximately 2,800 dwellings	157 ha
Publication Draft Local Plan (2014)	2800 dwellings	157ha
Proposed site Allocation in the City of York Local Plan Preferred Sites Consultation (Consultation July 2016).	1348 dwellings	55ha
August 2016 Proposed Quantum of Development and Size of Site	Option A: 1,350 dwellings Option B: 1725 dwellings	65ha 73ha

Using the assessment work which Arup prepared for the 2014 Environmental Statement as a basis, the following section sets out a review of the implications on the assessments for the August 2016 Option A and Option B Proposed Quanta of Developments. Given the proposed site boundaries have changed since the 2014 Environmental Statement and included some land that was not considered in this assessment the impact of the indicative Option A and Option B Land Use plans would need to be validated through an updated Environmental Statement.

Subject CYC Local Plan Preferred Sites Consultation

Date 1 September 2016

Job No/Ref 601971-40

1.3 Air Quality

Original Assessment 2014 Environmental Statement Summary (2,800 dwellings)

The development site is in close proximity to the CYC AQMA, which is designated due to the exceedances in the relevant air quality standard. With appropriate mitigation measures¹, there was considered to be a low risk for significant effects from construction. Based on the land uses proposed within the 2014 layout, pollutant concentrations were below the relevant air quality objective at all sensitive land use locations across the development site. One receptor, R15 which is located on Wigginton Road south, close to the A1237 roundabout, is predicted to experience a slight adverse impact. Furthermore, it should be noted that the predicted impact significance was negligible at receptor locations within the AQMA.

As such, the operation of the 2014 layout was expected to have an overall negligible impact to the surrounding area and air quality is considered of minor significance in the planning process.

Indicative implications of the Option A and Option B 2016 proposed quanta of development and site layout

The provision of Option A: 1,725 dwelling or Option B: 1,350 compared to 2,800 dwellings will give rise to less vehicle movement, resulting in a reduction road traffic emissions. The fall in the amount of vehicle emissions would result in lower local air quality pollution concentrations at sensitive receptor locations both at the proposed development and on the local road network.

It is still recommended that dwellings are located away from the new or existing road network as per the original design. No change to mitigation measures originally recommended should be required.

1.4 Noise and Vibration

Original Assessment 2014 Environmental Statement Summary (2,800 dwellings)

The 2014 Environmental Statement considered that there were potential noise effects as a result of the originally proposed 2,800 dwellings. These effects were considered to have the potential to impact on nearby noise sensitive receptors, as well as on the originally-proposed development itself.

With the implementation of the identified mitigation measures², residual effects were considered Neutral/Negligible, with the exception of indirect road traffic noise generation on the wider road network. The extent of these impacts are only localised to two section of road but the impact is nonetheless considered Minor Adverse.

Indicative implications of the Option A and Option B 2016 proposed quanta of development and site layout

The provision of Option A: 1,725 dwelling or Option B: 1,350 compared to 2,800 dwellings will give rise to less vehicles movements, resulting in a small reduction in road traffic noise emissions on the wider road network. If significant community uses are also provided locally this should further serve to reduce the number of vehicle movements.

¹ Detailed within Chapter G of the Land North of Clifton Moor, York Environmental Statement (October 2014)

² Detailed within Chapter F of the Land North of Clifton Moor, York Environmental Statement (October 2014)

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Properties at the perimeter of any development tend to experience more road traffic noise than properties towards the centre of a development. A larger scale of development would therefore tend to have a higher proportion of shielded properties to exposed properties.

It is still recommended that dwellings are located away from the new or existing road network as per the original design. No change to mitigation measures originally recommended should be required.

1.5 Flood Risk and Drainage

Original Assessment 2014 Environmental Statement Summary (2,800 dwellings)

The 2014 Environmental Statement considered that the effects of the originally proposed scheme were those set out in Table 2.

Stage		Residual Effects
During construction	Flood Risk and Drainage	Through appropriate mitigation measures, including careful sequencing of the works, the development poses a Neutral/Negligible flood risk to neighbouring areas during construction.
	Water Quality	A low residual risk of an accidental spillage or encountering contamination remains on site, although with appropriate construction management practices embodied in the construction stage Environmental Management Plan, the impact is considered to be Neutral/Negligible.
After Construction	Flood Risk and Drainage	<ul style="list-style-type: none">The development is not located within the 1 in 100 year floodplain or the 1 in 1000 year floodplain. Consequently the site is not considered to be at significant risk of fluvial flooding, and the residual effect is considered to be Neutral/NegligibleAlthough the proposed development will increase the impermeable area on site in comparison to the current situation, with the implementation of a planned surface water drainage network and the inclusion of attenuation features the risk to the development from surface water flooding is considered to be Neutral/Negligible.Through careful design of separate drainage systems and surface water attenuation measures with discharges restricted to agricultural runoff rates, the residual effect of the development on neighbouring areas can also be considered Neutral/Negligible.
	Water Quality	K7.6 The risk of accidental spillages and diffuse pollution occurring in the completed development cannot be eliminated, and mitigation measures cannot be relied upon completely to intercept/isolate potential pollutants before they discharge to downstream watercourses. As a result, the residual effect is considered to be Minor Adverse.

Indicative implications of the Option A and Option B 2016 proposed quanta of development and site layout

Since Arup completed the 2014 Environmental Statement, the number of proposed houses and the overall area of development has reduced, therefore it is assumed that the impermeable areas that need to be drained of the amended site layout has reduced. This means that the requirements for attenuation storage are likely to be less than previously estimated. The following

- Even though the impermeable areas may have reduced, the attenuation pond as shown on the Land Use Plans provided may need to be larger than shown to attenuate the flow sufficiently. The approach to managing surface water will need to be developed and the ponds as shown could suffice, but it may be beneficial to show the realign the SUDs to take up the full extent of the field boundary to the south-west of the site. This would provide flexibility depending on the future surface water drainage strategy for the site.

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- Discussions regarding maintenance access to the Internal Drainage Board Drain to the west of the allotments and south of the outdoor sports facilities allotments will need to be agreed with the IDP, as a 7 metre wide easement either side of the IDP is required. This is unlikely to change the masterplan layout significantly, but would need to be considered in later iterations of the layout.
- The distance between the most northerly impermeable surface (for example, road or house roof) and the attenuation pond is slightly larger since 2014. This increases the risk that surface water may not be able to drain to the pond by gravity which would need to be assessed using information on land levels. If sustainable drainage systems are being used throughout the development this could help to drain these northern areas and reduce the size of the attenuation needed at the south west corner, however, there are a variety of options for drainage of the surface water that could be considered in future phases of the project.

The likely flood risk and drainage implications of the August 2016 Proposed Quantum of Development and Size of Site will depend on the strategy and space made available for conveyance and attenuation of surface water. It will be necessary to ensure that there is sufficient space to implement appropriate sustainable drainage.

1.6 Geology and Ground Conditions

Original Assessment 2014 Environmental Statement Summary (2,800 dwellings)

The 2014 Environmental Statement concluded that the potential abnormalities associated with development of the site relate to its use as an airfield during WWII in the south west corner of the site which could potentially contain contaminated made ground, disposal areas, munition stores. There is also a moderate risk of unexploded ordnance.

Indicative implications of the Option A and Option B 2016 proposed quantum of development and site layout

The proposed 1750 residential layout appears to have mitigated this potential risk as the area of the former airfield is shown as landscaping. Whilst the 1750 option is extended beyond the originally assessed EIA boundary to the north, and therefore would require updated assessments to take place, historical mapping for this area indicates that the land use has been agricultural and the risks are likely to be no different than what has already been described within the 2014 Environmental Statement.

1.7 Utilities

Original Utility Report 2014

A Utility Report produced in 2014 provided an understanding of current capacity for provision of electricity, gas, water supply and water treatment and the likely implications of 2,800 new dwellings in this area. At this time agreements of required capacity upgrades were discussed with providers. However it is likely that known capacity in 2014 has now been taken up by other developments in the area and capacity / required upgrades will need to be reconfirmed.

Indicative implications of the 2016 proposed quantum of development and site layout)

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With the provision of either Option A: 1,350 or Option B: 1,725 dwellings compared to the initial 2,800 development option, there will be an inevitable decrease in the provision and therefore capital cost of electricity, gas, water and telecommunications infrastructures in the preferred development option.

Moreover, the reduction in overall loads and connections will necessitate reassessment by the statutory utilities providers for the requirements for reinforcement of primary infrastructures into which the preferred development option will interface. Further high level engagement with the respective statutory utilities providers would be necessary to reassess the potential impact on the primary infrastructures.

The principal focus with regards to the provision of statutory utilities is the procurement of a suitable High Voltage (HV) electricity supply for the selected development option. Northern Powergrid (NPG) advised on 30th January 2014 that a primary HV substation construction is unlikely if the site load doesn't exceed a Maximum Demand (MD) of 6.0MW. This assessment was based on NPG's understanding of their available spare capacity on their primary infrastructure at the time of engagement. It should be noted that any recent developments with the area may have significantly reduced the available spare capacity and further engagement with NPG would be required to establish if this is the case.

On 3rd May 2014, Arup advised NPG the anticipated MD for the development (based on 2,800 dwellings) would be in the order of 7.5MW. A reduction of dwellings to 1,750 would see a reduced MD to approximately 5.5MW and for 1,350 dwellings, an MD of circa 4.6MW. With these lower dwelling numbers, the significant project risk associated with a primary HV substation could be discharged subject to further negotiation with NPG.

It will also be necessary to undertake further engagement with the City of York Council (CYC) to establish their planning and environmental policies regarding the provision of domestic electric vehicle charging points and renewable energy technologies. With a continuing increase in the purchase of electric vehicles, their associated loads are likely to have a significant impact on the MD of the preferred option. This may warrant the construction of a primary substation requiring significant expenditure, additional land and planning consent. The introduction of renewable energy technologies i.e. building integrated photovoltaic for example, will further reduce the demand for electricity from the utility network so it will be necessary to understand the extent to which renewables will be introduced.

1.8 Conclusion

In conclusion, based on the Environmental Statement prepared in 2014 the Clifton Gate site can support either Option A: 1350 dwellings or Option B: 1725 dwellings. However given the proposed site boundaries have changed since the 2014 Environmental Statement, the summaries of impact are therefore indicative and based on the high-level layout received in August 2016. The likely impacts of the Option A or B Land Use Plans would need to be validated through an updated Environmental Statement. The environmental effect of the development of a smaller site (option A or option B) is reduced compared to the development of the larger site, but are considered acceptable in EIA terms.

The required mitigation to deliver either of the masterplan options can be provided within the site areas shown. To provide flexibility for the future approach to surface water management it would be beneficial to include additional land to provide SUDs ponds on the site's boundaries. The exact

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areas would be developed further thorough an updated Surface Water Strategy in due course, but additional land within the allocation would allow space for onsite surface water management.

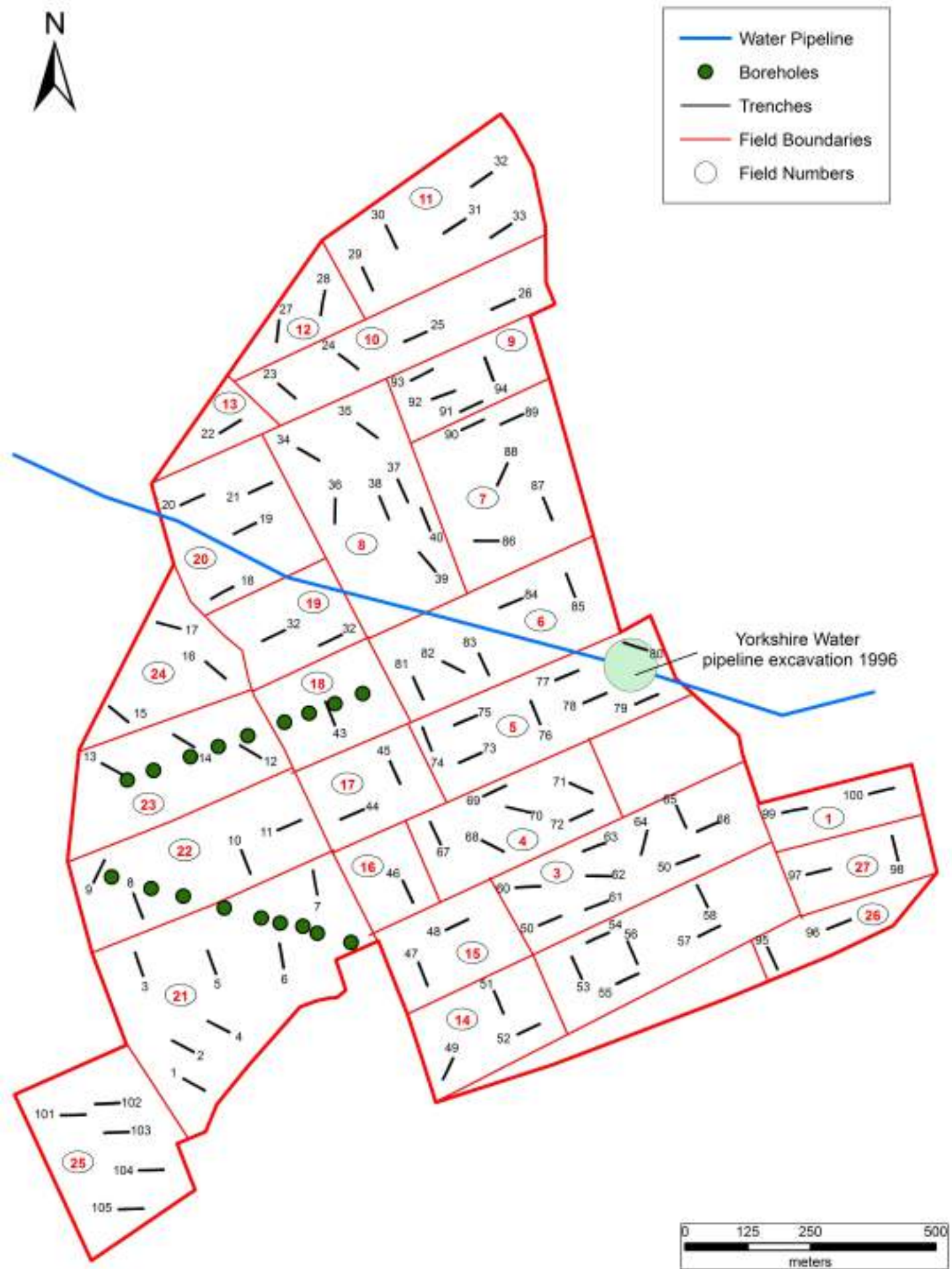


Figure 2 - Location of trenches, field boundaries, boreholes and Yorkshire Water pipeline

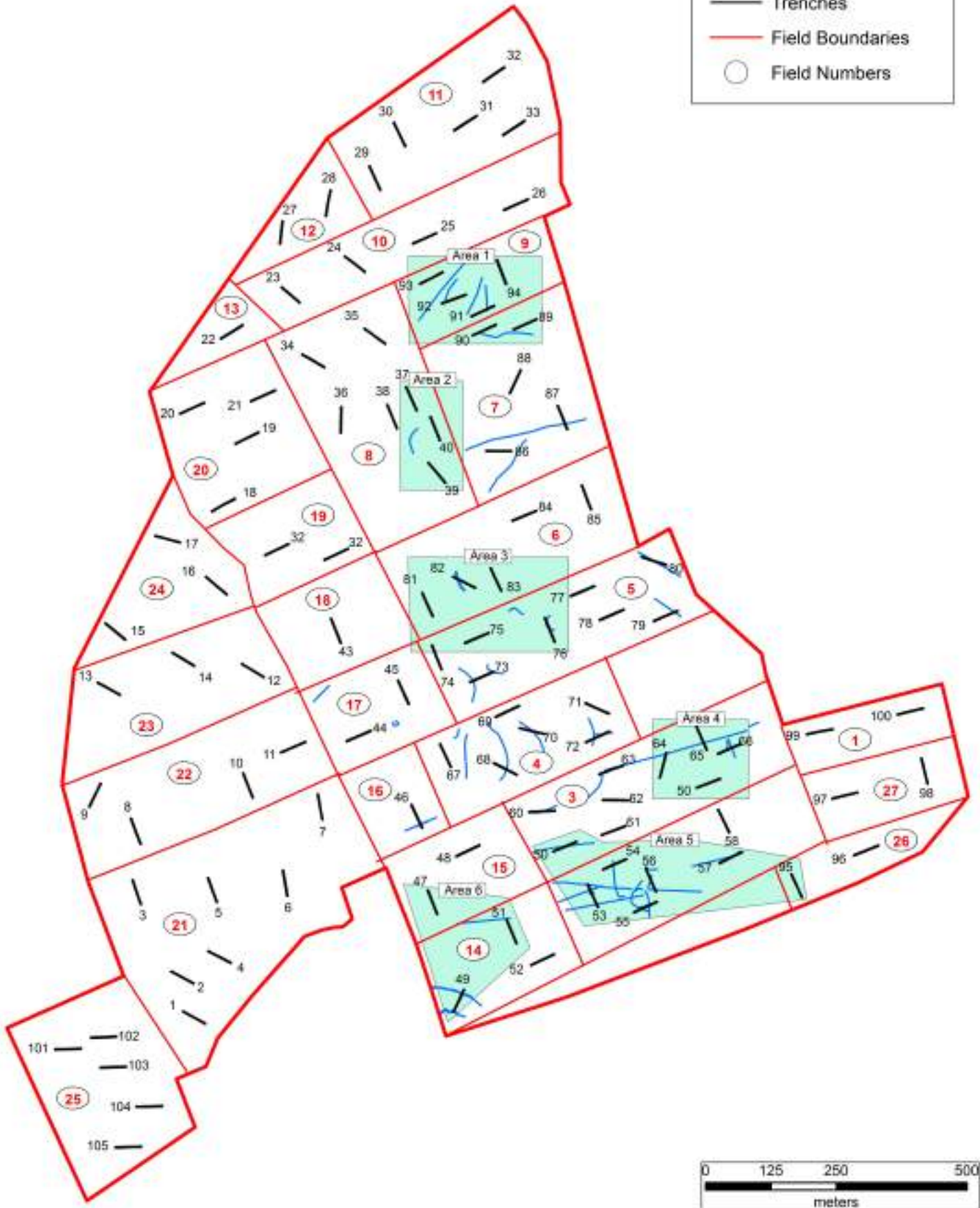
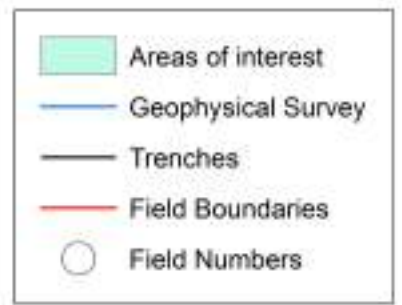


Figure 11 - Location of areas of interest with Geophysical Survey results

Clifton Gate, York Masterplan

Sketchbook

September 2014

turkington martin

Site Opportunities / Constraints

1. Hedgerows

The site contains a significant number of hedgerows which have remained unchanged since at least 1853. These hedgerows are distributed throughout the site in an east-west grid pattern and are likely to contribute positively to ecology as wildlife corridors. They will be assessed for their historic, amenity and wildlife value.

Opportunities

- Soft boundaries to development
- Amenity value
- Wildlife corridors
- Pedestrian & cycle routes
- Screen parts of the development



1853 OS Site Survey



Key

— Hedgerow existing since 1853

Site Opportunities / Constraints

2. Watercourses

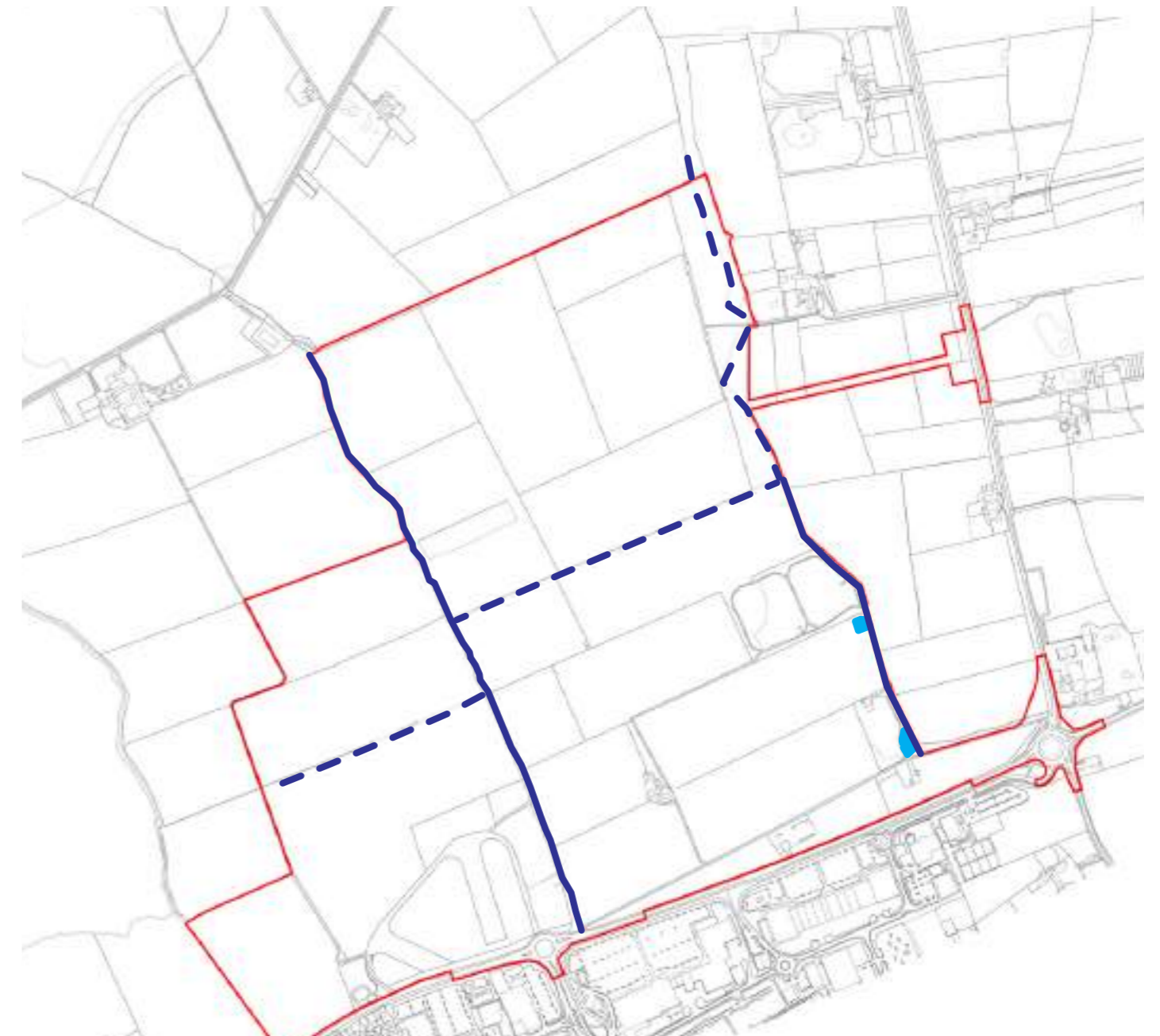
The site features two historic drainage ditches running N-S, one through the centre of the site and the other adjacent to the eastern site boundary. The latter drains into two ponds, also existing since 1853. The features contribute positively to local ecology.

Opportunities

- Contribute towards SUDs
- Amenity value
- Wildlife corridors
- Pedestrian & cycle routes
- Inform development plots



1853 OS Site Survey



Key

- Drainage ditches existing since 1853
- Ponds existing since 1853
- - - Other ditches

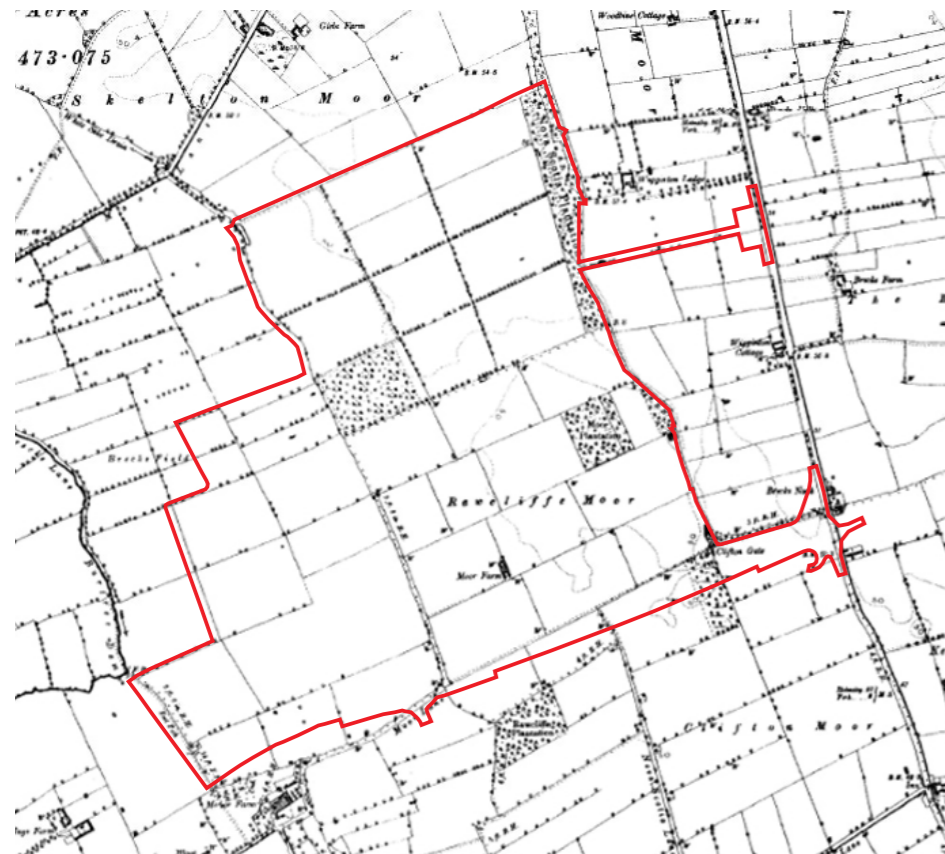
Site Opportunities / Constraints 3. Trees / Woodland

The site contains three plantations, namely Skelton, Moor and Poplar Plantations, dating back to 1893. The Poplar plantation to the SW of the site was extended by 1991 to include land formerly used as the York Municipal Aerodrome. The site shares its NE boundary with the Nova Scotia Plantation, which dates back to 1853.

The site also features a number of mature trees located centrally on historic field boundaries.

Opportunities





- Contribute towards natural & semi-natural open space requirements
- High amenity and wildlife value
- Screen to parts of the development



1893 OS Site Survey



Key

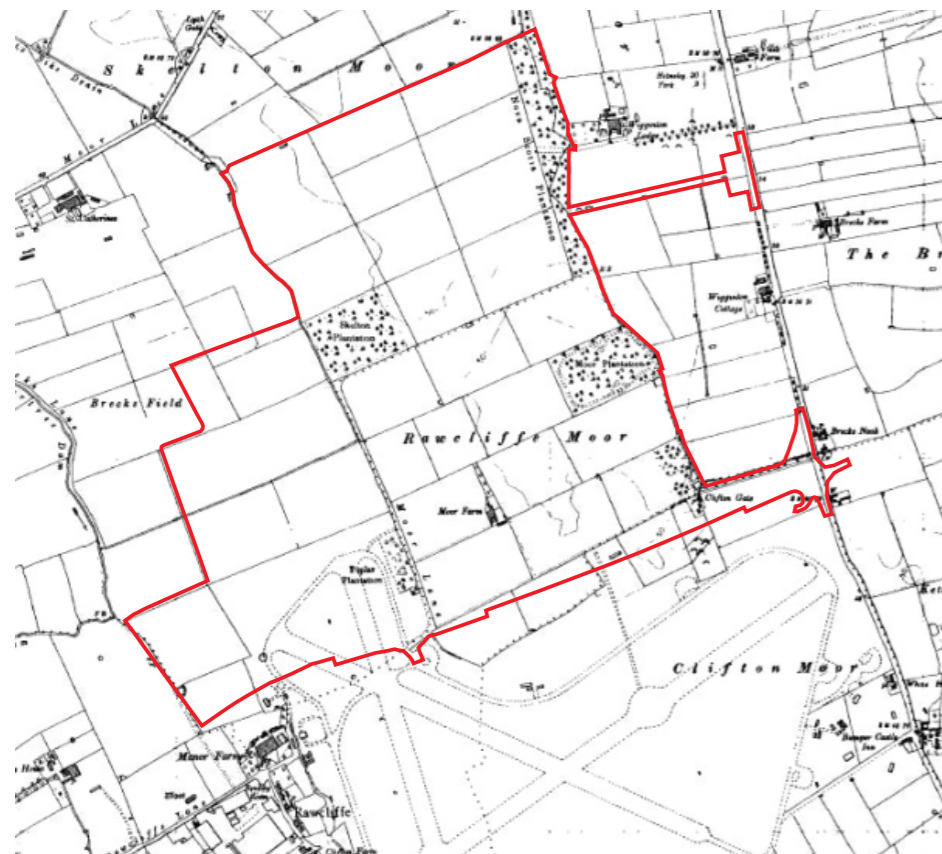
 Plantation existing since 1853	 Plantation existing since 1991	1. Skelton Plantation	1. Moor Plantation
 Plantation existing since 1893	 Mature trees	3. Nova Scotia Plantation	4. Poplar Plantation

Site Opportunities / Constraints

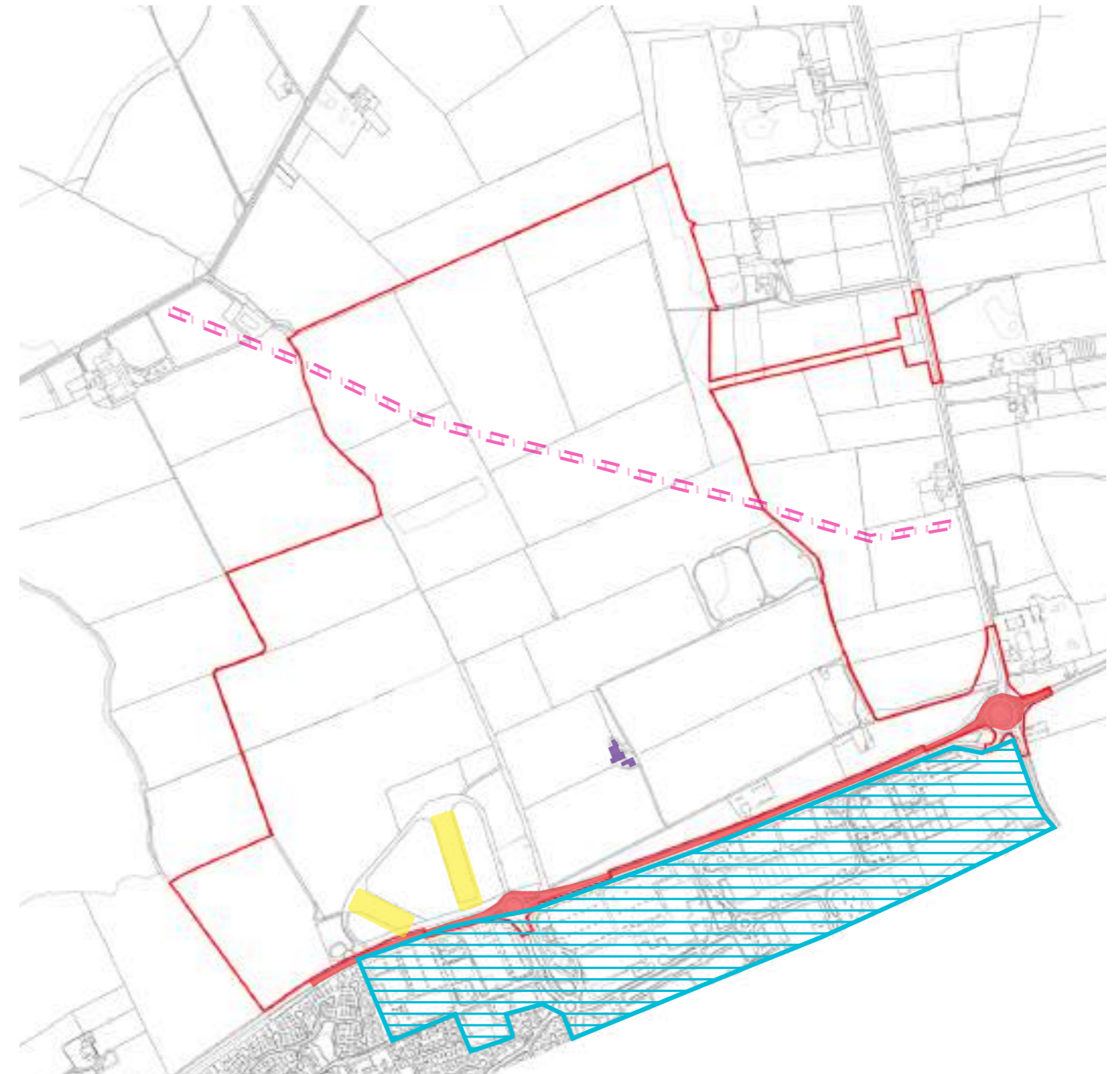
4. Other

There are a number of other existing features that will influence the development of Clifton Gate:






- The outer ring road and Clifton Moor Centre retail park to the south will generate noise and pollution whilst affecting the visual quality of the site's south extent
- The former aerodrome runway to the SW has been identified as a site of possible contamination in the YCC local plan
- Existing victorian buildings of Moor Farm
- Underground water supply running diagonally through the site will affect what development can occur above and adjacent to the route.




1938 OS Site Survey



Key

- | | | |
|--|---|--|
|  Outer Ring Road A1237 |  Moor farm - Victorian Farm building |  Retail development |
|  Disused aerodrome runway - potential contaminated land |  Underground water main | |

Site Opportunities / Constraints 5. Composite

- Key
-  Hedgerow existing since 1853
 -  Drainage ditches existing since 1853
 -  Ponds existing since 1853
 -  Plantation existing since 1853
 -  Plantation existing since 1893
 -  Plantation existing since 1991
 -  Mature trees
 -  Outer Ring Road
 -  Disused aerodrome runway
 -  Moor Farm - Victorian farm building
 -  Underground water main
 -  Retail development



Site Opportunities / Constraints

6. Future Transport Improvements

Future widening of the Outer Ring Road to create a two lane dual carriageway including an upgrade to the two existing roundabouts will impact on the southern site boundary.

In addition, there will be a Park and Ride facility constructed to the south east corner of the site. Access into the development from the two roundabouts on the Ring Road and potentially from Wigginton Road may result in loss of some or all of the adjacent existing plantations and watercourses.



Key

- | | |
|--|---|
|  Land identified to upgrade outer ring road and junctions |  Indicative alignment of possible access to Wigginton road |
|  Indicative extent of Park and Ride site |  Conflicts with existing landscape features |
|  Possible extension to Park and Ride site |  Possible green buffer to ring road |

Green Corridors

One of the key characteristics of York is how the city developed out from its historic core in the form of radial corridors separated by a series of green fingers

The proposed site aligns with one of these development corridors which extends radially outwards north-west of York City Centre.

The proposed development sits between two green fingers, consisting of the Ouse Corridor to the west of the site, and Bootham Stray to the east.

These green fingers positively contribute towards York's green infrastructure network, enhancing the amenity and biodiversity value of existing routes into the city centre and links nature conservation sites with other open space.

They also preserve the notion of approaching the city through the countryside



Key

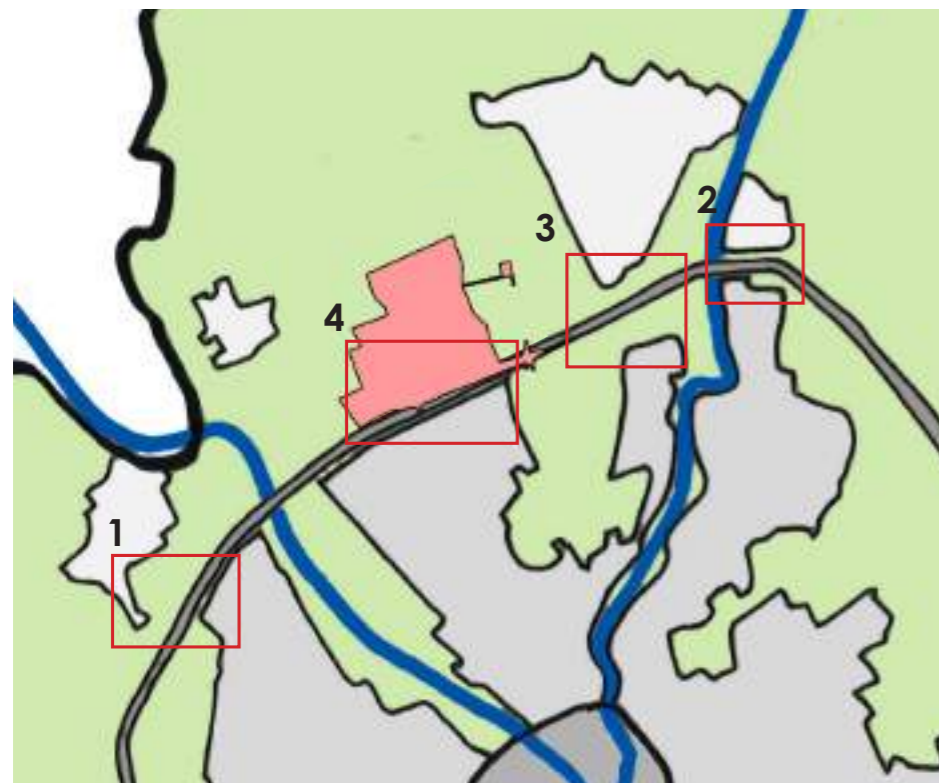
- City Centre
- Urban area
- Site
- NW urban 'wedge'
- Green corridors of regional importance
- Green corridors of district importance
- 1 Ouse corridor
- 2 Bootham Stray
- 3 Foss corridor
- 4 Monk Stray



Relationship with Ring Road

The Outer Ring Road currently demarcates the urban area of York from the surrounding Green Belt countryside. There are no present examples of the suburban area of York extending beyond the Outer Ring Road. Where settlements are close to this road, there is a separation ranging between 60 and 400m. This has the appearance of reinforcing the village character which is distinct from suburban York. This can be seen in the relationship of villages such as Poppleton, Earwick and Haxby with the ring road and the city beyond.

Using an area of open space north of the Ring Road would establish a village character, provide a distinct identity of the development, and reinforce the separation from York Way.



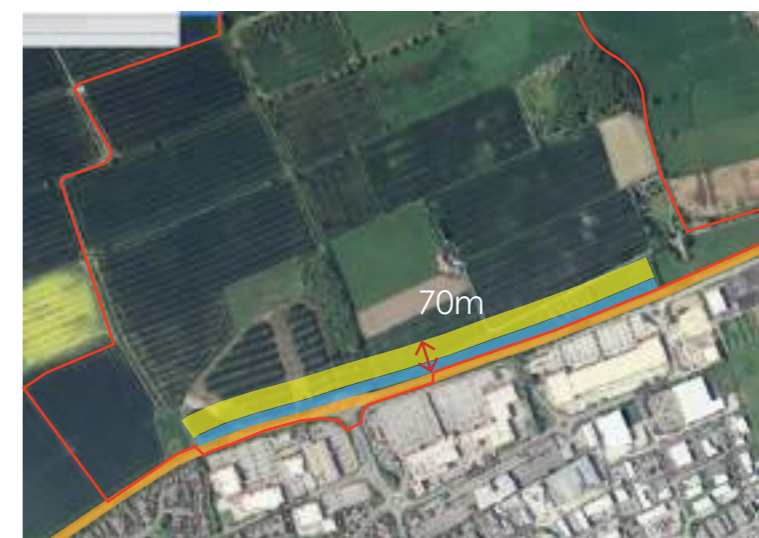
1. Poppleton



3. Haxby



2. Earwick



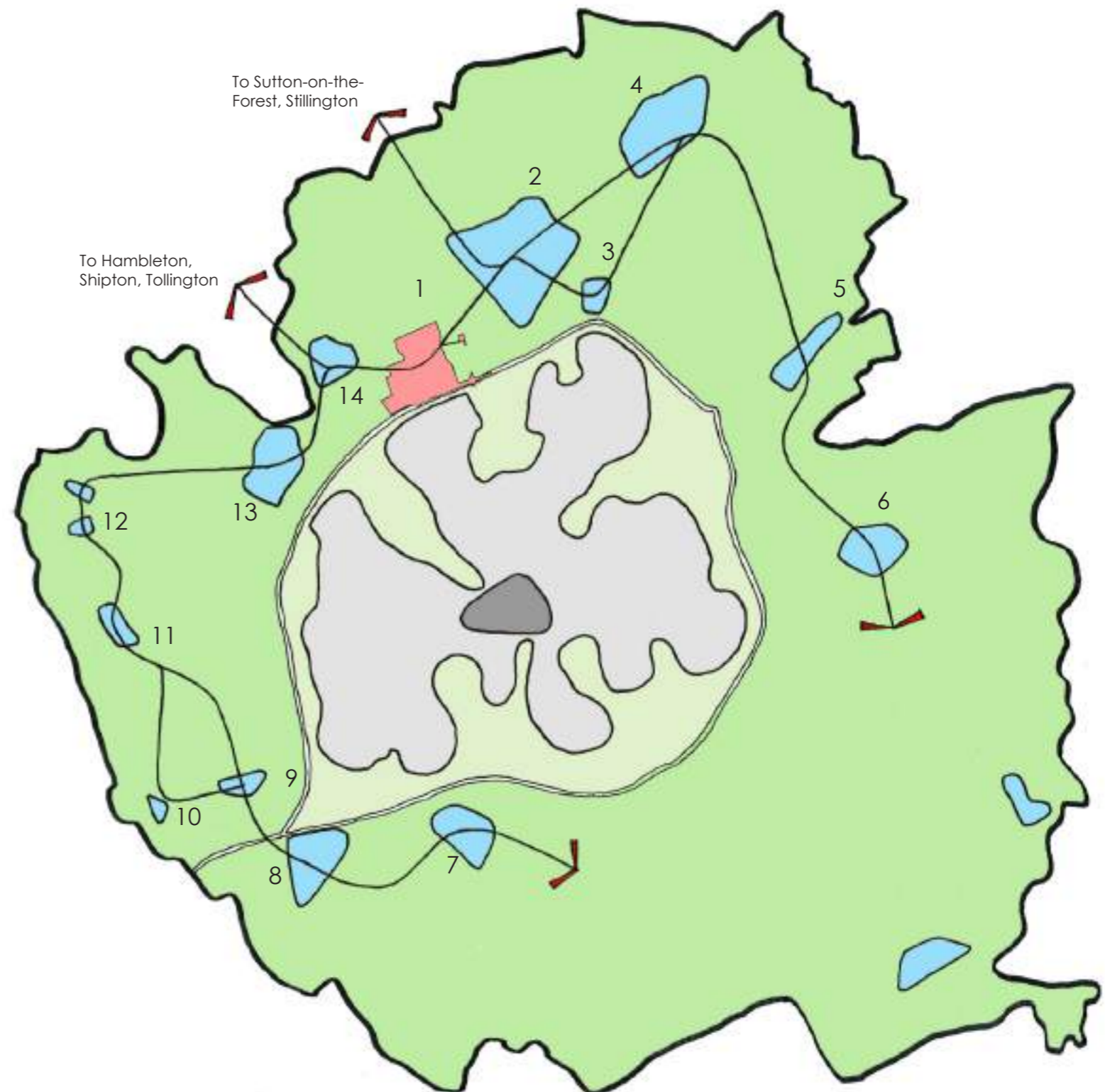
4. Proposed Site

20m highway upgrade
50m green buffer






Relationship with Other Villages

The site is in Green Belt land, which surrounds the city beyond the Outer Ring Road. This road acts as a physical and psychological barrier between the development and suburban edges of York. The site will have a distinct character and its location is comparable with other adjacent villages such as Skelton and Wigginton.

The site has the potential to contribute to the network of villages that surround York. New east/west connections should be made through safe walking routes and cycle paths, encouraging residents to share community facilities with surrounding villages.



Key

- | | | | |
|---|-------------------------------|----|----------------------------|
|  | City Centre | 5 | Stockton on the Forest |
|  | Urban area | 6 | Dunnington |
|  | Site | 7 | Bishopthorpe |
|  | Villages | 8 | Copmanthorpe |
|  | Green belt | 9 | Askham Bryan |
|  | Links to surrounding villages | 10 | Askham Richard |
| 1 | Clifton Gate | 11 | Rufforth |
| 2 | Wigginton/Haxby | 12 | Hessay |
| 3 | Earswick | 13 | Upper and Nether Poppleton |
| 4 | Strensall | 14 | Skelton |

Site Connections

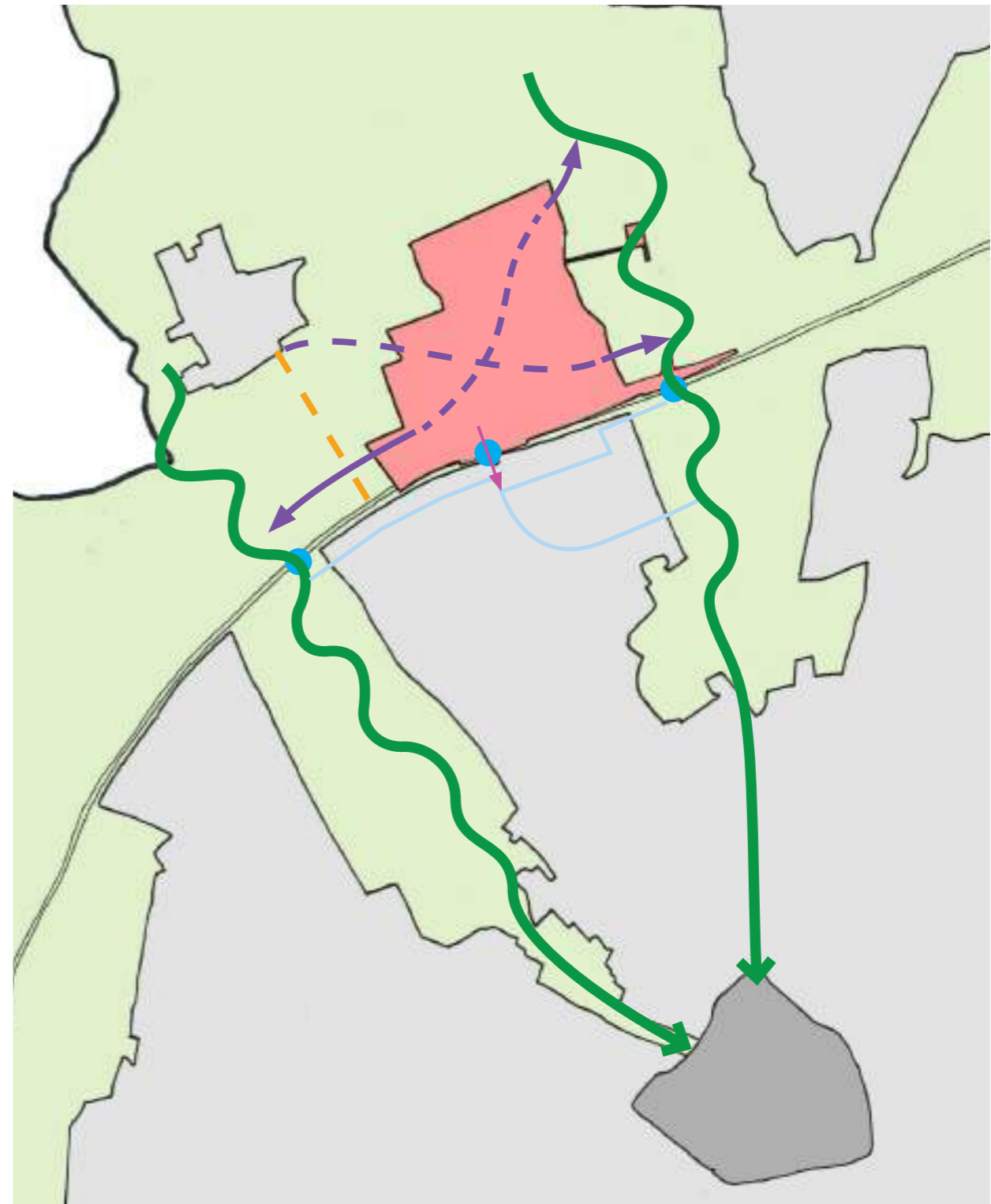
The site is located between two green corridors, the Ouse corridor and the Bootham Stray, providing safe pedestrian and cycle connections to York city centre and the feeling of entering the city through a green environment. There is also a series of secondary pedestrian routes to the south of the Outer Ring Road connecting the urban areas of Rawcliffe and Clifton.

The site will link directly with these green corridors so that amenity pedestrian routes into the city centre can be created without the passing through urban areas. Links over the ring road will also be provided, connecting the site to the retail area and pedestrian routes beyond.



Key

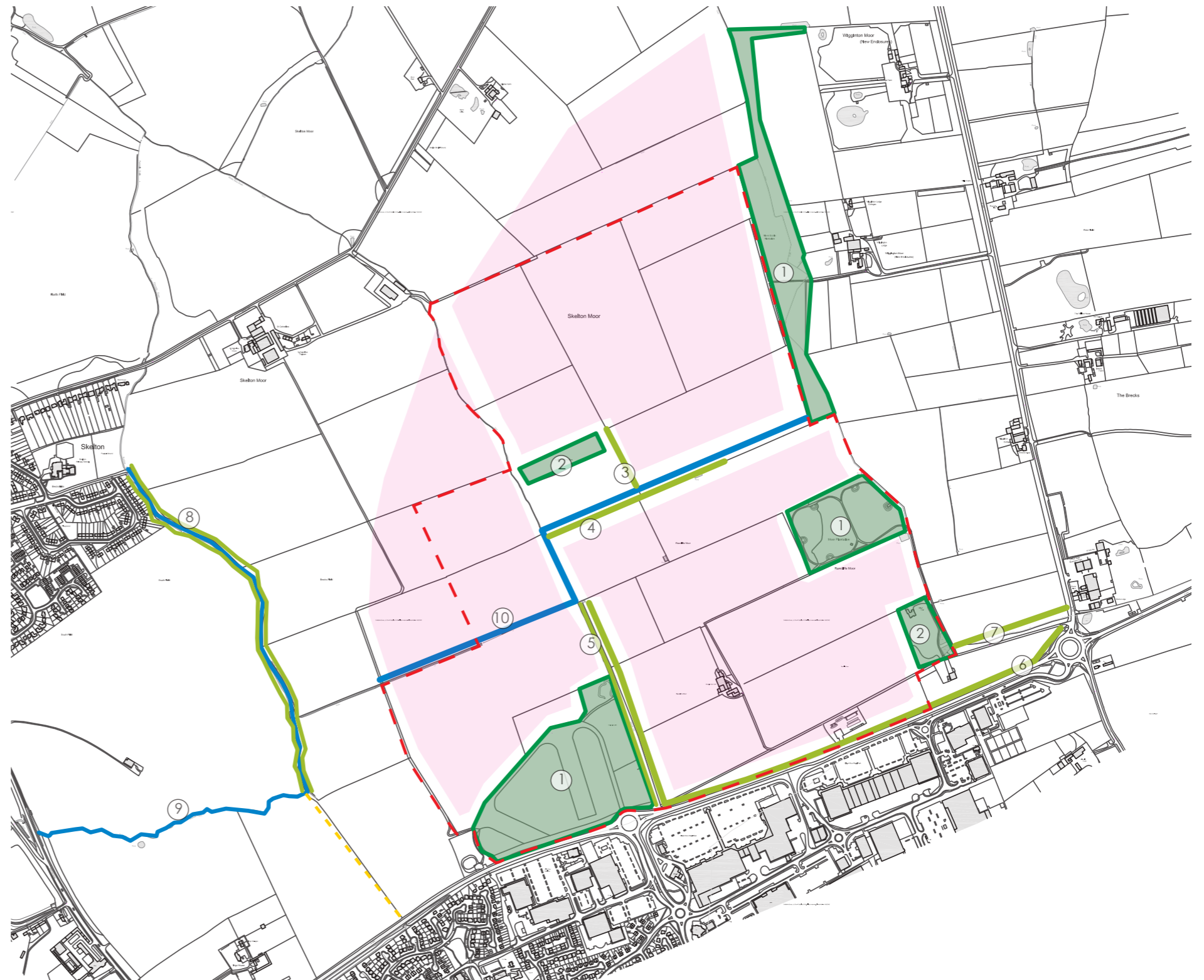
- City Centre
- Urban area
- Site
- Existing footway
- Primary pedestrian/cycle route
- Secondary pedestrian/cycle route
- Proposed new link from site to pedestrian links
- Proposed new link from site to pedestrian links
- Safe crossing points across ring road



Existing Significant Landscape Elements

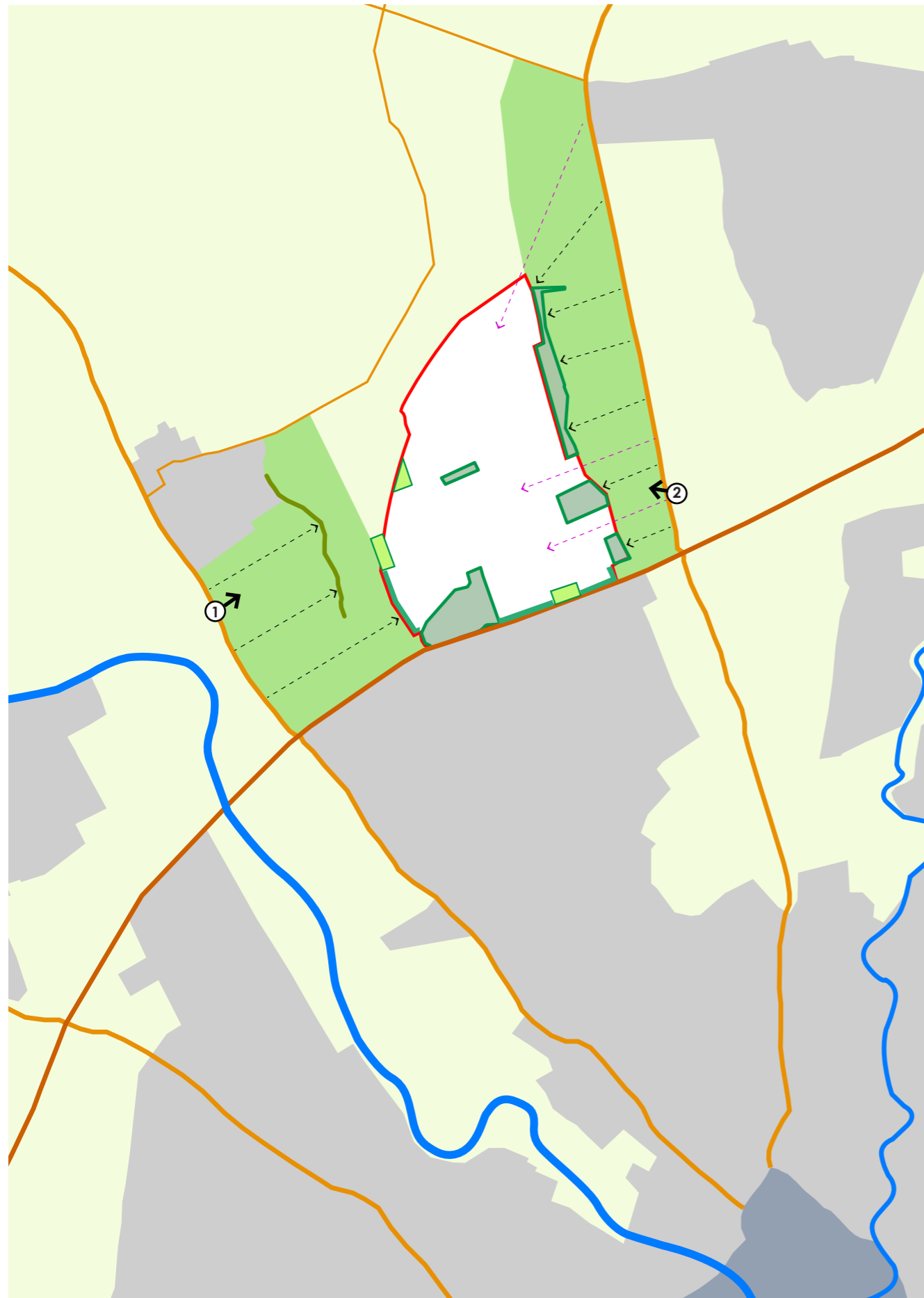
- ① Mature plantations add significant character & landscape value to site
- ② Secondary plantations are smaller in size but are still prominent features on flat site
- ③ Prominent Blackthorn hedgerow
- ④ Prominent Blackthorn hedgerow with mature oaks
- ⑤ Low double hedgerow of minor landscape value
- ⑥ Prominent hedgerow screens site from outer ring road
- ⑦ Prominent hedgerow with mature oak trees
- ⑧ Double row of mature hedgerow screens site from Skelton
- ⑨ Burtree Dam is a stream draining into River Ouse with significant landscape value
- ⑩ Prominent water course through site with significant landscape value

Development Areas



Views and Screening





Key

- Site Area
- Urban Area
- Countryside / Green Corridors
- River
- Outer Ring Road
- Arterial routes into York City Centre
- Green buffer between site and arterial routes into York City Centre
- Views towards site screened by landscape elements
- Glimpsed views into site between landscape elements

Visual Impact on Green Corridors & Aerial Routes

The site is located between two aerial routes into York City Centre. To the east the, Wiggington Road runs through Bootham Stray and to the west the A19 travels adjacent to the Ouse Corridor. The site is set back from both aerial routes, separated by corridors of open countryside measuring between 315-500m the east and 860-1400m to the west.

Screening is provided by existing plantations to the east and mature Hedgrows adjacent to Burtree Dam to the the west, with proposed planting further restricting views into the site.

The extent of screening landscape elements will result in distant glimpsed views into the urban centre from Wiggington Road, reinforcing village character and minimising visual impact on adjacent green corridors.



View 1 from A19. Double line of mature hedgerow and tree planting located 700m from the road effectively screens site area



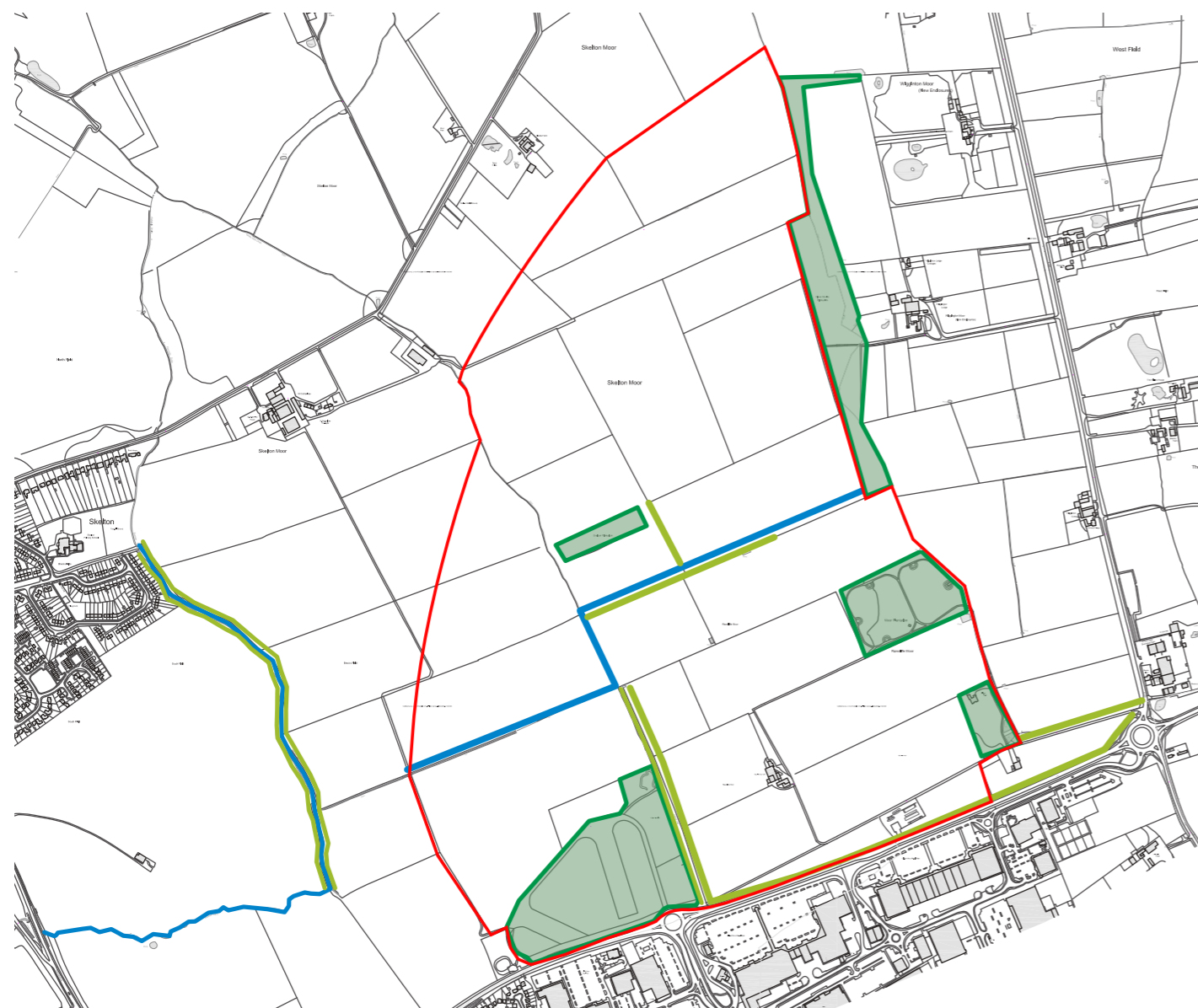
View 2 from Wiggington Road. Mature woodland of Moor and Nova Scotia Plantations screen views towards site, with two breaks in woodland extent allowing distant glimpsed view towards proposed urban centre

Landscape Concept

1. Existing Landscape Character

The site is characterised by open farmland interspersed with blocks of mature woodland which have considerable landscape value and screen much of the site from the surrounding area, particular along its eastern edge.

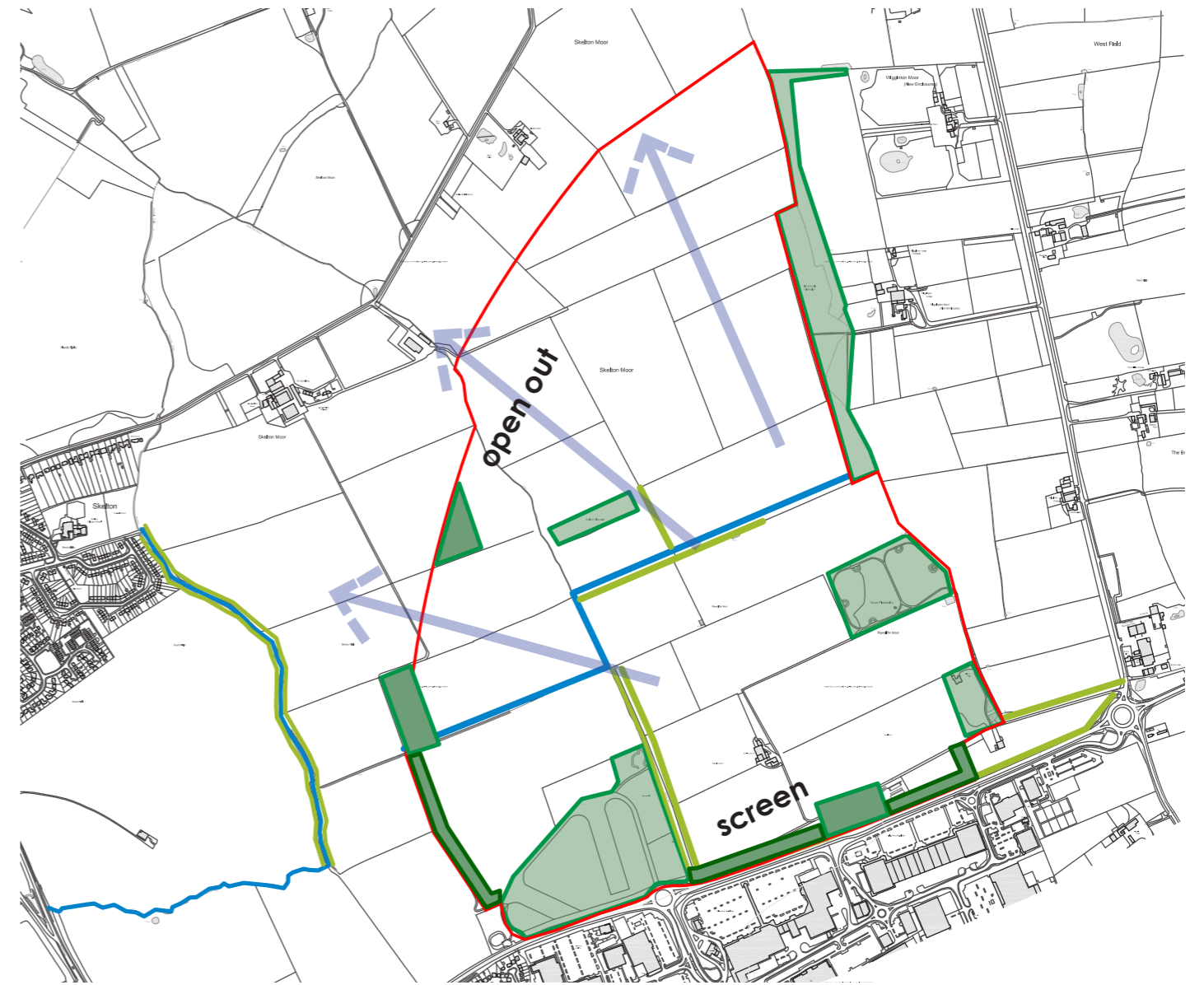
A series of hedgerows form an orthogonal grid across the site, some are low and provide no visual separation, others have been let to grow and together with occasional mature trees create division across parts of the site. Drainage ditches often align with the hedgerows and flow from east to west towards the River Ouse.



2. Screening Landscape Elements

New blocks of woodland planting will be linked to the existing by connecting landscape corridors along the southern and western boundaries to screen the development from the adjacent Outer Ring Road and retail park and soften sensitive views from the public bridleway to the west of the site.

These green spaces and links will form a green buffer to the site's periphery providing key amenity space, screen to busy roads and reinforcement of the village character.



Land Budget - Open Space Provision



	Typology	Quantity standard (ha/1000)	Emerging Policy Requirement (ha)	Option 2 Provision (ha)
Open Space	Natural & Semi-Natural	2.13	13.72	20.78
	Parks & Gardens	0.18	1.16	
	Amenity Green Space	1.45	9.34	27.53
	Total		24.22	48.31
Play	Provision for Children	0.48	3.09	
	Provision for Teenagers	0.21	1.35	
	Total		4.44	4.44
Outdoor Sports		1.78	11.46	11.46
Allotments		0.292	1.88	1.88
Total			42.00	66.09

* All calculations assume population of 6440 based on 2800 dwellings with 2.3 population factor



Land Budget - Play Provision

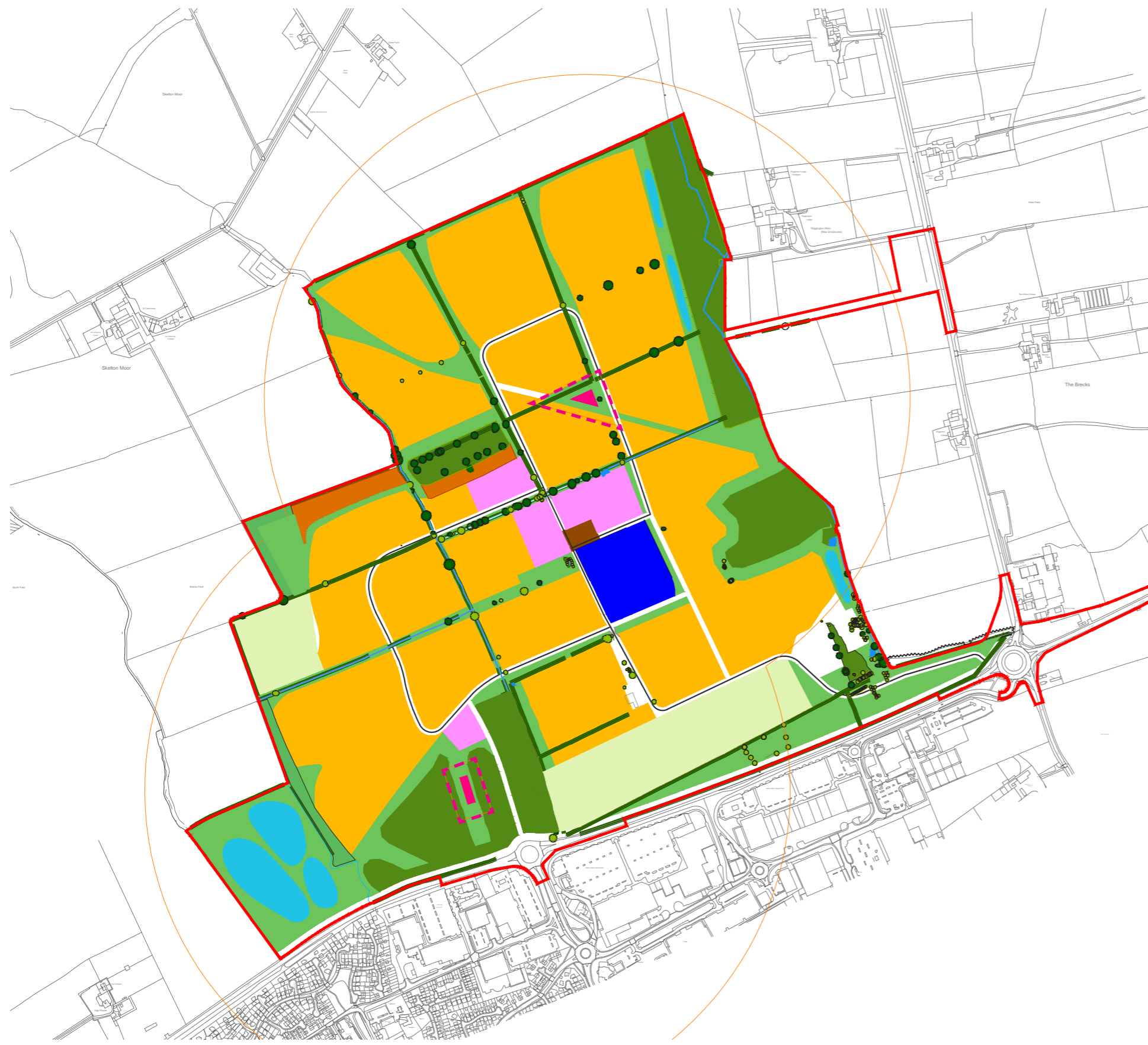
Emerging Policy Open Space Requirement: 44,400 sqm

2nr NEAP - 2,037 sqm




9nr LEAP - 42,477.5 sqm

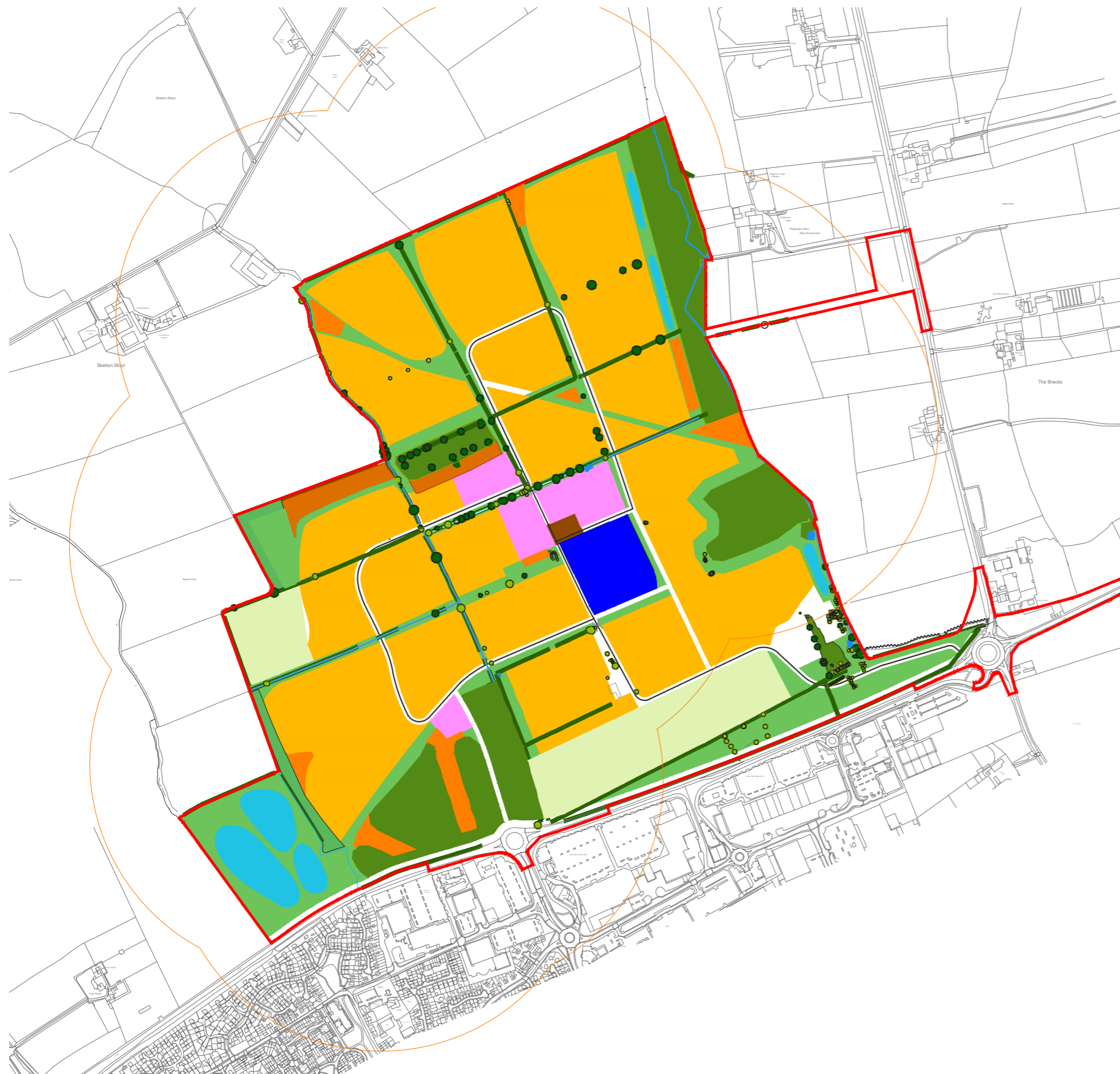
30nr LAP - 2,900 sqm

Total: 44,400 sqm





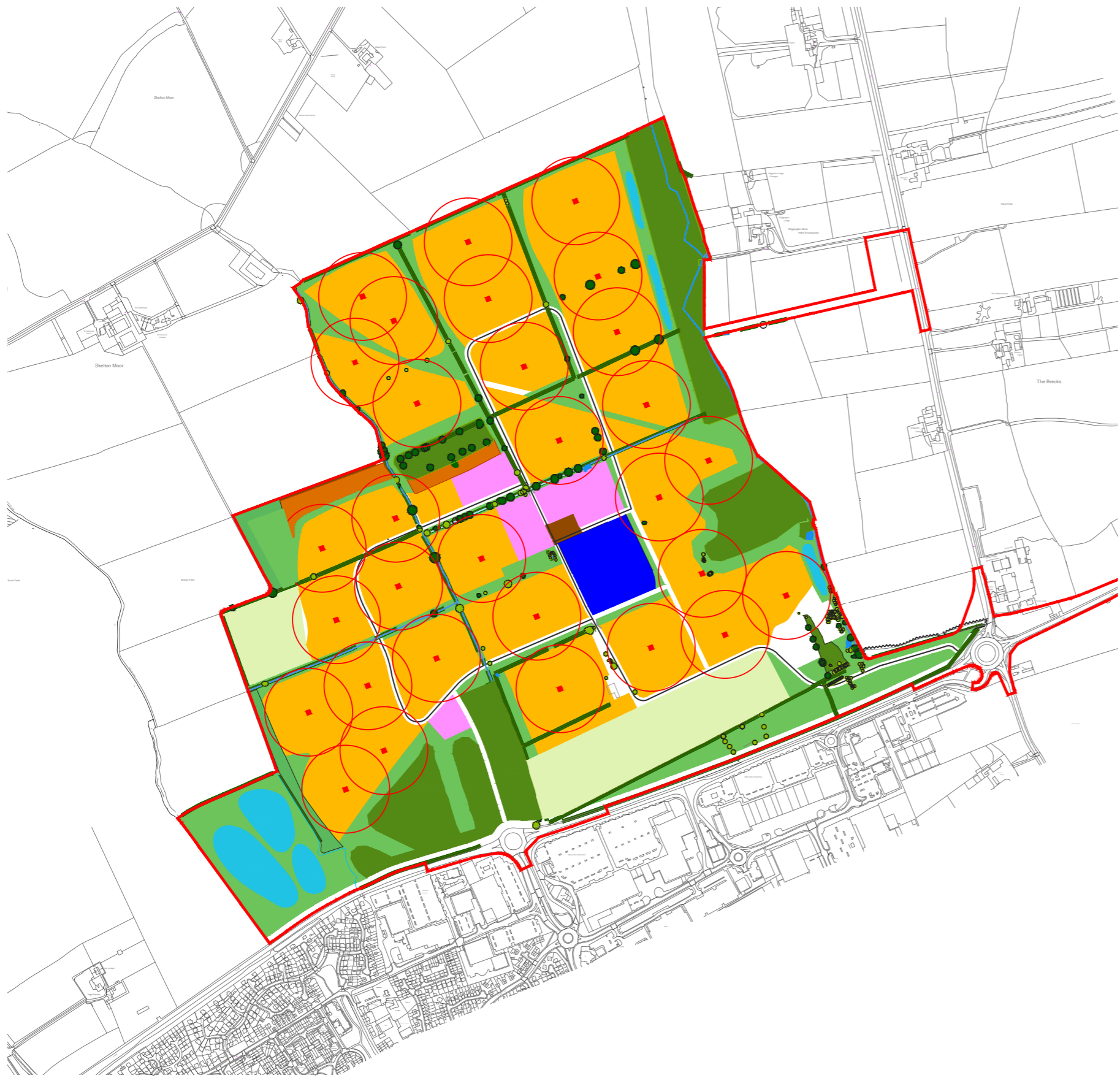
Play Provision- Option 1 Neighbourhood Equipped Area for Play (NEAP) Provision

-  **NEAP areas**
Recommended minimum size: 1,000 sqm (465 sqm hard area)
-  Minimum 30m buffer zone to adjacent dwellings
-  Maximum 15 minute (720m) walking distance from dwellings
(CYC Emerging Policy Accessibility Standard)



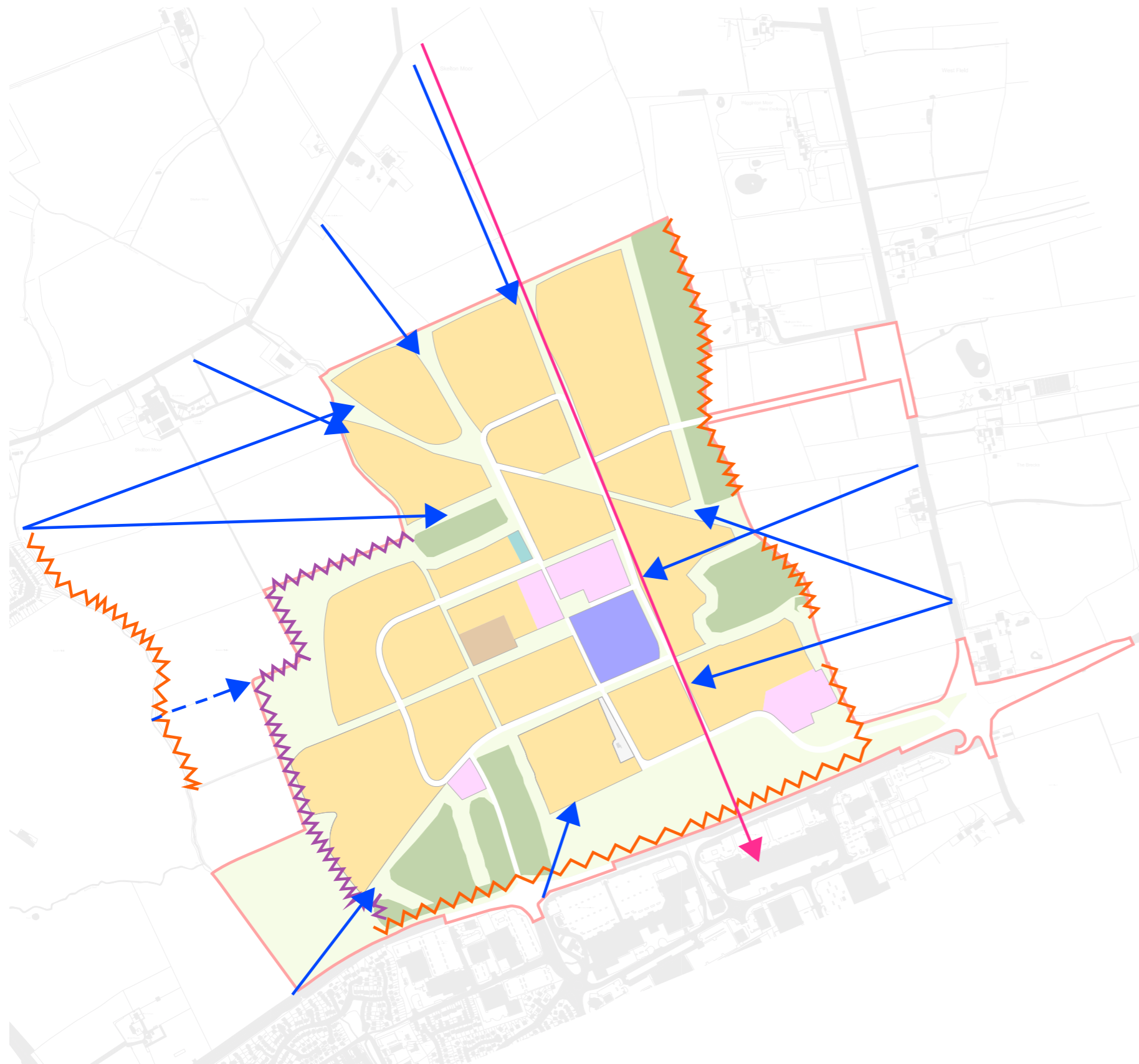
Play Provision - Option 1 Local Equipped Area for Play (LEAP) Provision

-  **LEAP areas**
Recommended minimum size: 400 sqm
Minimum 10m buffer zone to adjacent dwellings
Minimum 20m distance to habitable rooms
-  Maximum 10 minute (480m) walking distance from dwellings
(CYC Emerging Policy Accessibilty Standard)



Play Provision- Option 1 Local Area for Play (LAP) Provision

- **LAP areas**
Recommended minimum size: 100 sqm
Minimum 5m buffer zone to adjacent dwellings
- **Maximum 1 minute (100m) walking distance from dwellings**







Site Edges / Views

Existing woodland areas will be reinforced with new screening elements the west and south boundaries, providing visual separation from Skelton and Clifton Moor.

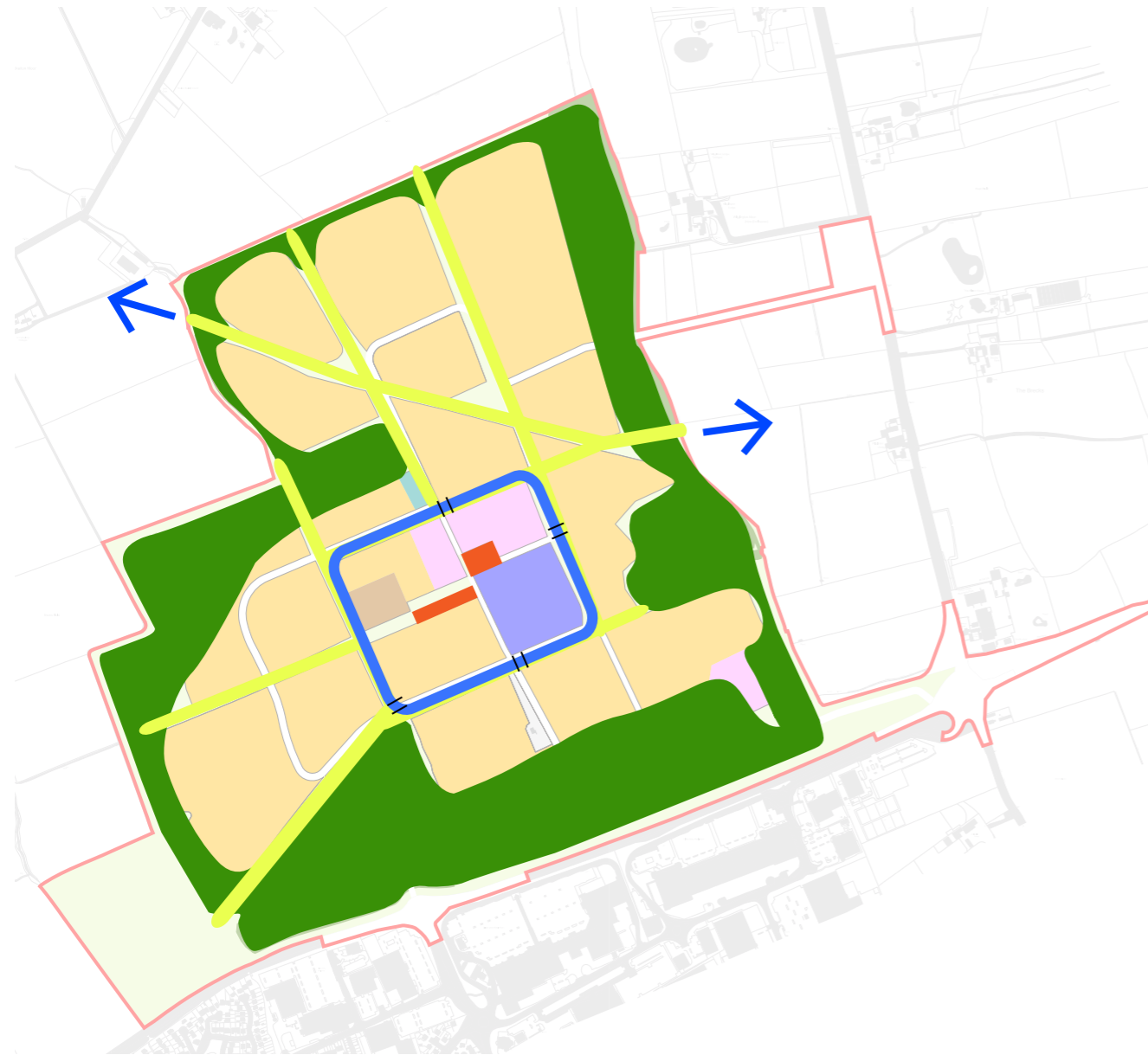
Views into the site from Shipton Road will also be screened, however gaps in the existing woodland on the east boundary will allow long distance glimpsed views into the the centre of Clifton Gate fom Wigginton Road.

To the north of the site, views from Moor Lane will also be possible where gaps exist in the existing hedgrows, however a landscape edge consisting of existing hedgerow, trees and ditches, combined with lower density of development will mitigate effects on the rural character of surrounding countryside.





Key

-  Existing landscape elements screening views into site
-  Proposed landscape buffer screening views into site
-  Existing views into site
-  Existing long range views across site

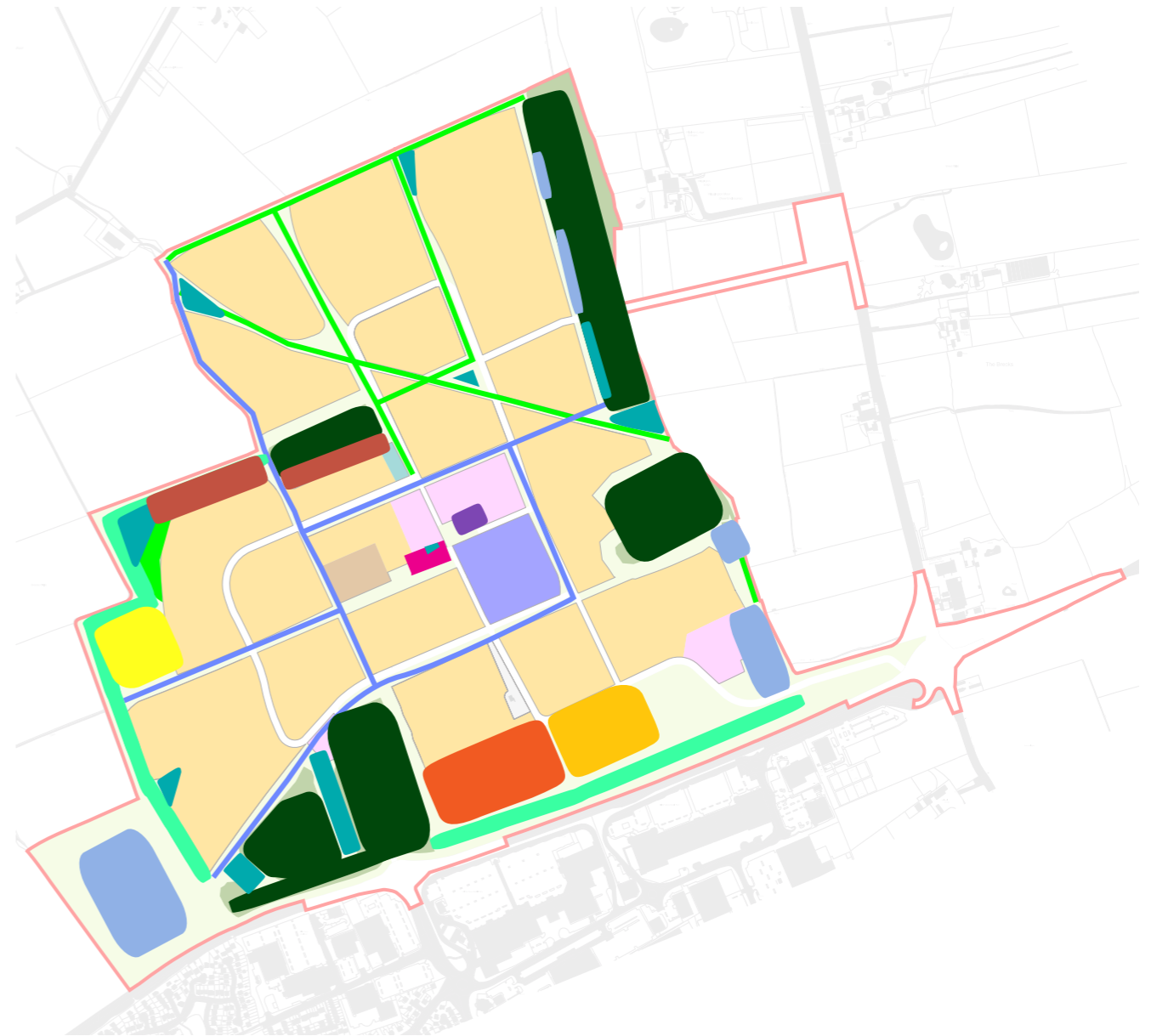
Landscape Concepts



Key

- | | | | |
|---|-------------------------|---|-----------------|
|  | Outer Ring / Green Edge |  | Green Corridors |
|  | Stream Edge |  | Community Hubs |

Open Space Typologies



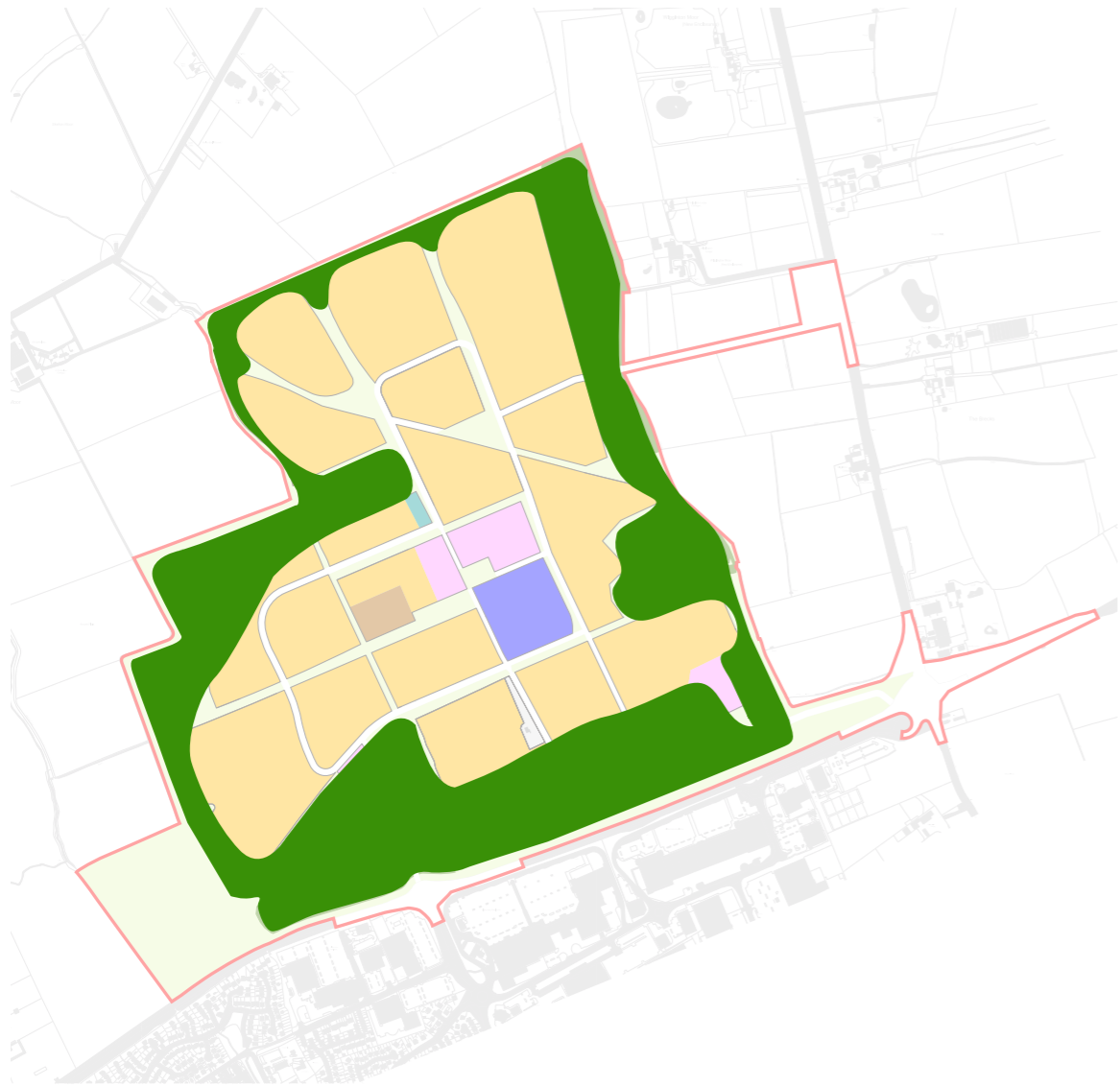
Key

- | | | | |
|---|--|---|--|
| Natural / Semi Natural | Outdoor Sports | Community Hub | Green Corridors |
|  Existing Woodland |  Cricket pitch |  Market Square |  Green Links |
|  New Woodland |  Grass pitches |  Village Green |  Stream Links |
|  Meadow |  Floodlit pitches | Community Facilities | |
|  Wetland | |  Play | |
| | |  Allotment | |

Landscape Concepts Green Ring

Existing fragmented woodland will be linked and strengthened with new tree planting, green spaces and sports pitches

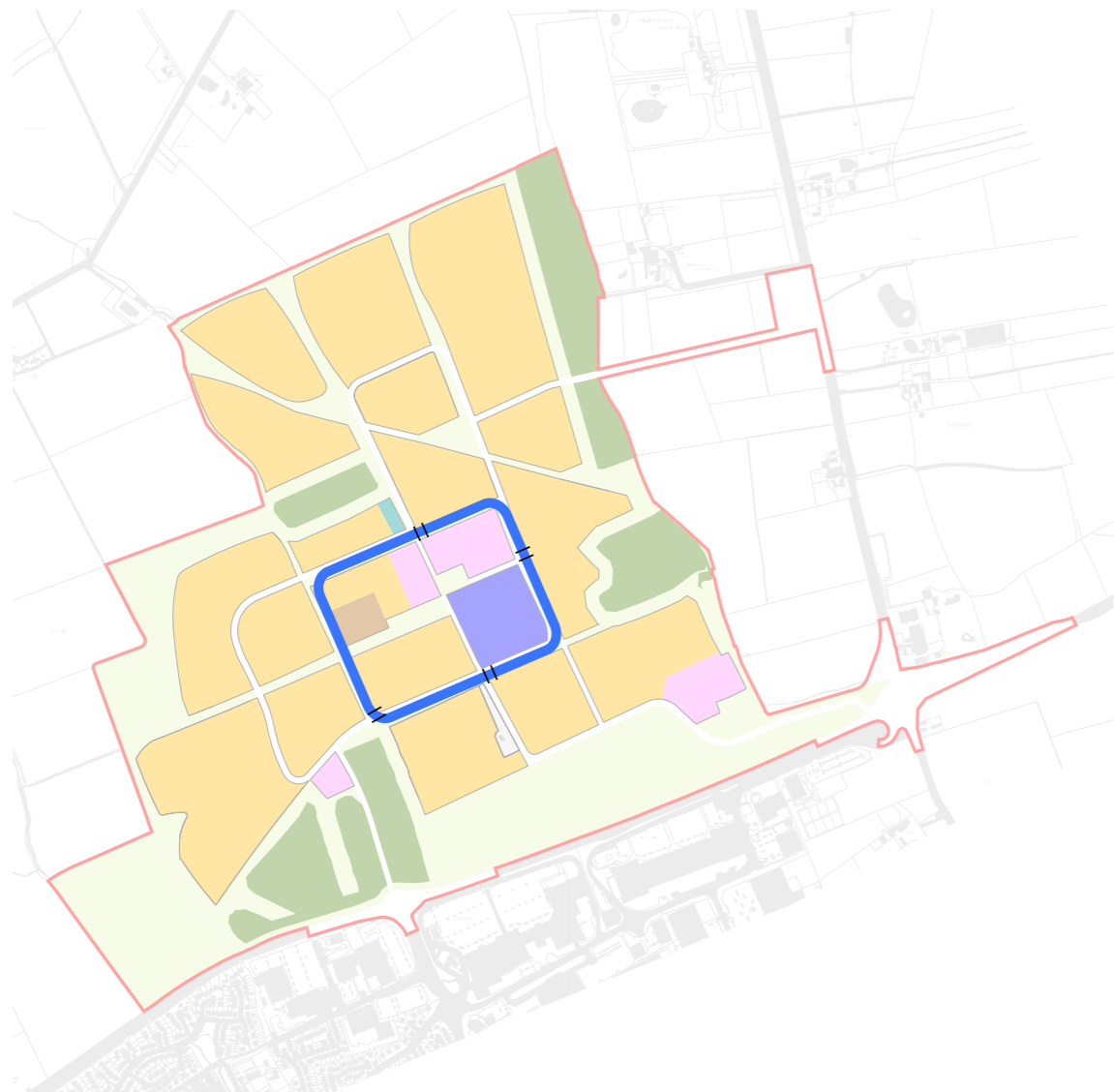
A series of linked green spaces will encircle Clifton Gate, providing recreation for the new community and ensuring a green buffer from Clifton Moor and a low density edge from the surrounding countryside



Landscape Concepts Village Stream

Existing watercourses will be strengthened by a new system of sustainable drainage (SUDS) to create a stream surrounding and defining Clifton Gate urban centre.

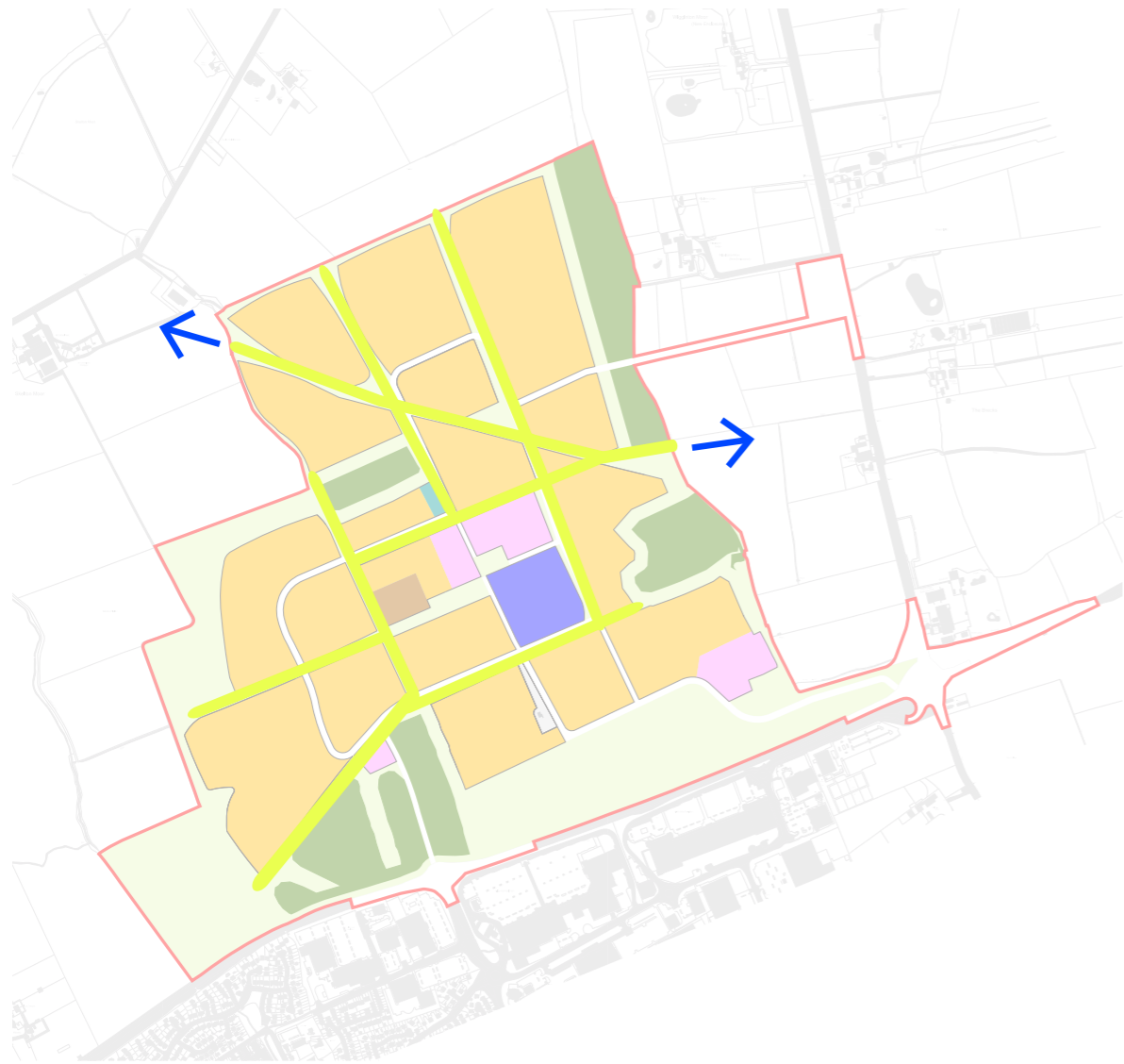
The stream will be crossed by bridges from the north and the south, marking the arrival the the village centre.

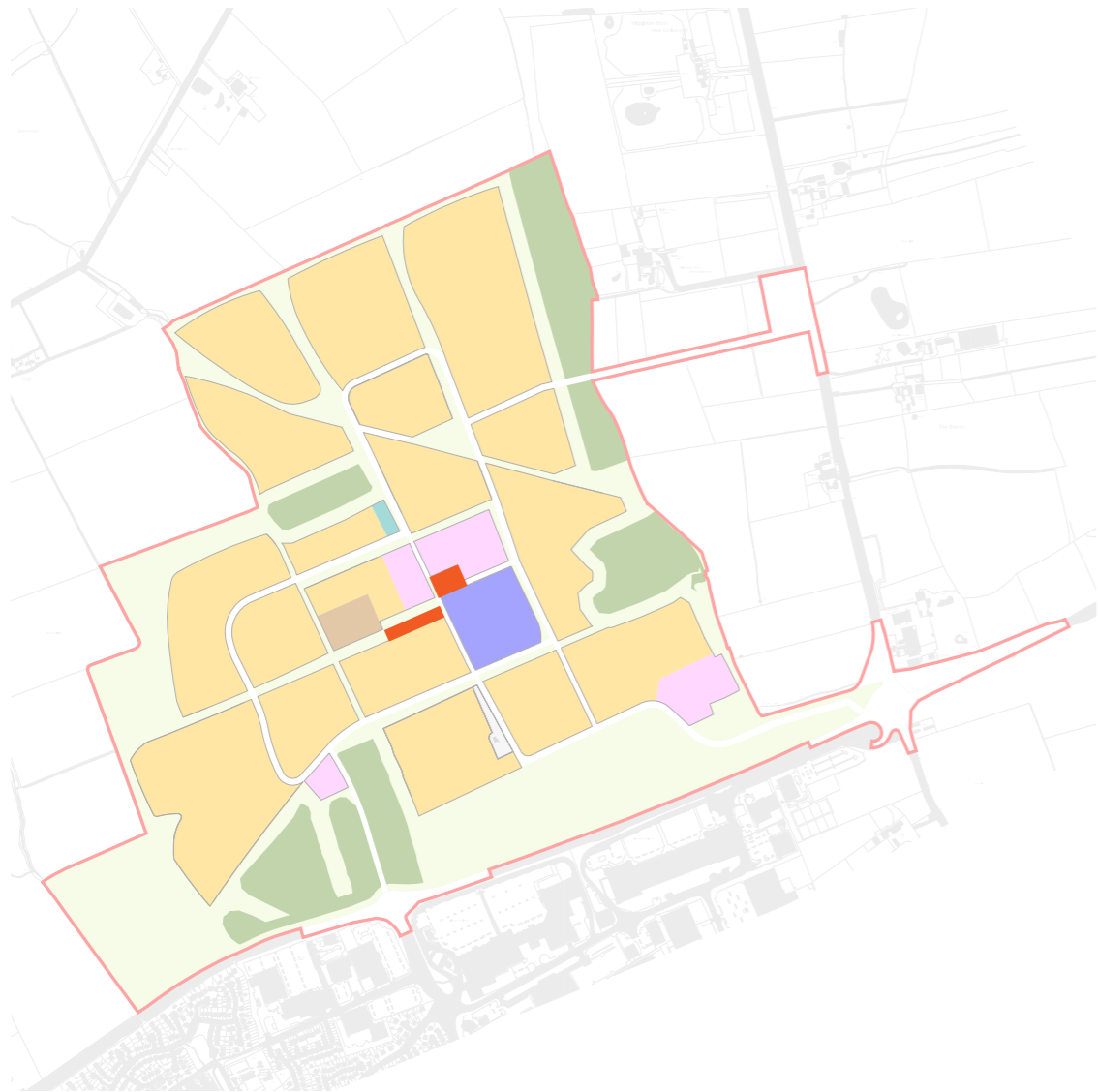


Landscape Concepts Linking Green Space

Linear green spaces will run through the residential area and incorporate watercourses and existing hedgerows.

These linking green spaces will create a network of pedestrian routes through the site and define individual neighbourhoods within the new development. They will accommodate a range of community and recreational facilities such as play areas and allotments.





Landscape Concepts Market Square & Village Green

A market square and adjacent Village Green will create a traditional heart for Clifton Gate. They will provide a number of community uses with local shops, a school and play area animating the spaces and creating a focal point for community activities.



Landscape Concepts Urban Centre



Key

- Market Square
- Secondary courtyards
- Village Green
- High Street
- Pedestrian priority shared surface
- Village Stream encircling urban centre
- leway to High Street
- leway to Market Square
- active frontage
- eye visual connection
- outwery aspect area for seating / market

Landscape Concepts Urban Centre: Local Precedents



Malton Market Square



Grassington Village Square



Stokesley Market Square



Village Courtyards



Dent High Street



Howarth High Street



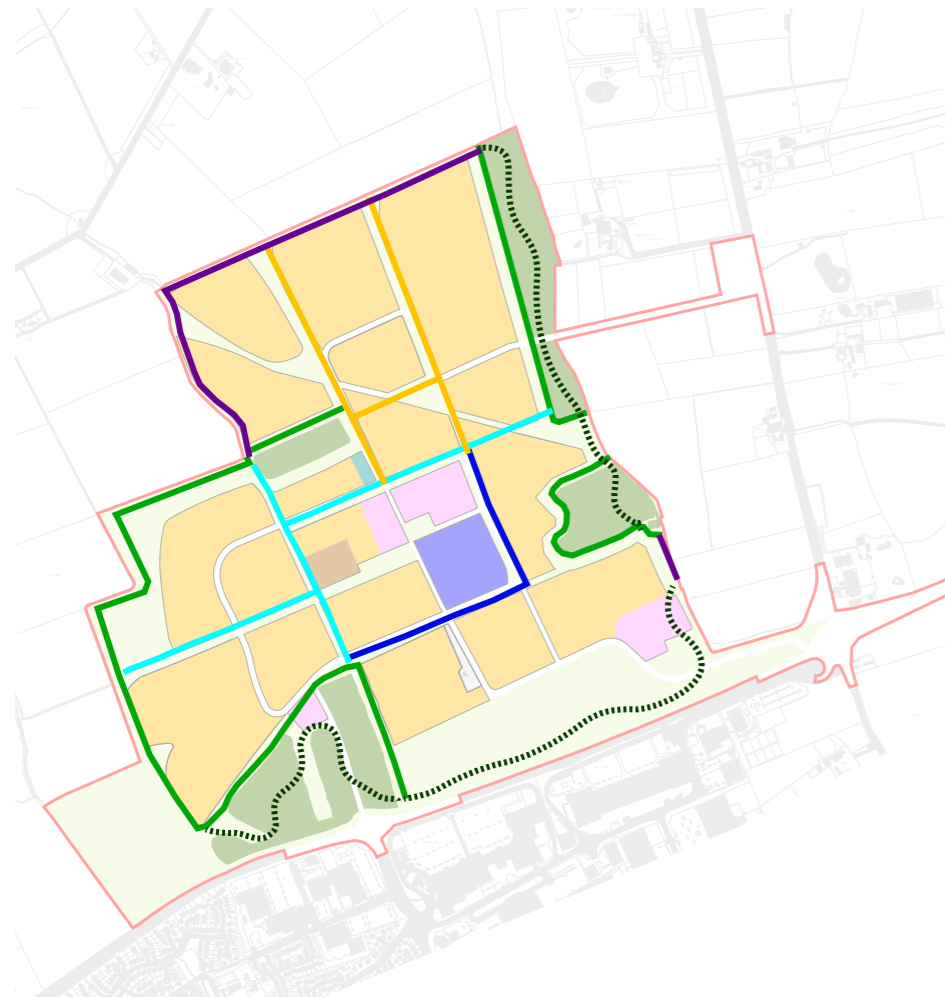
Haxby Village Green



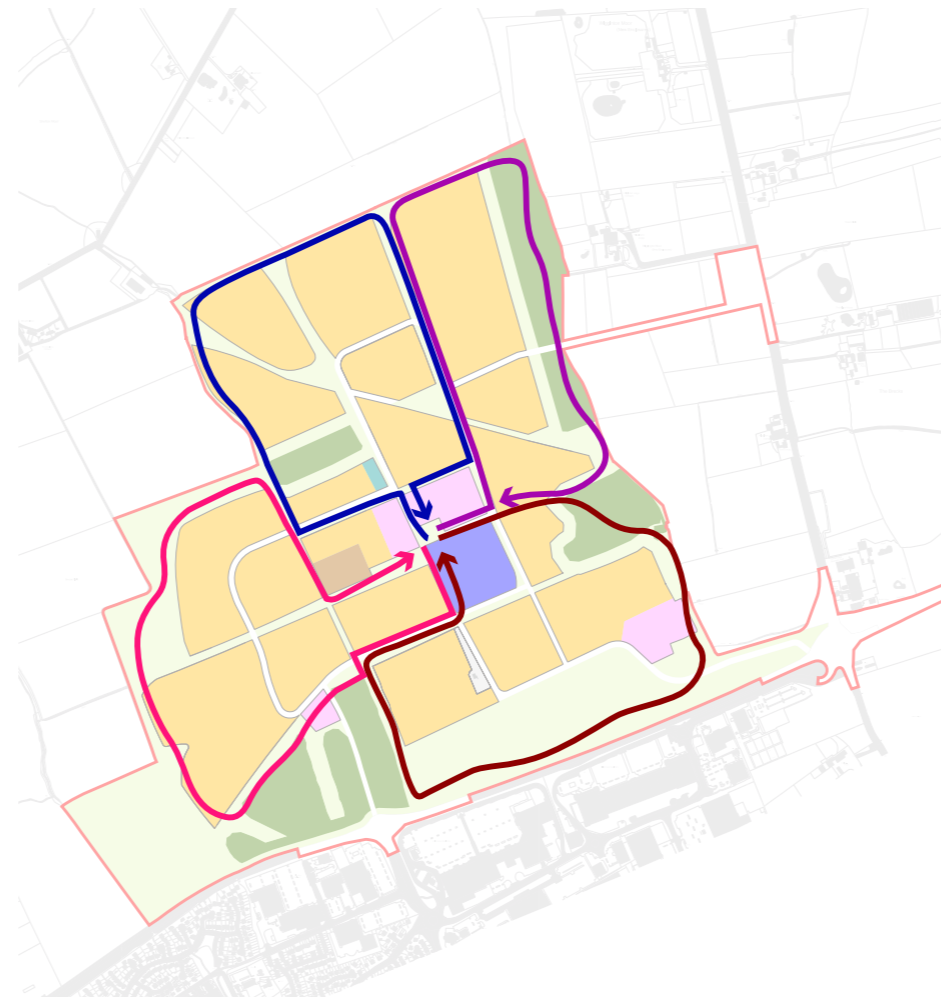
Skelton Village Green

Green Routes

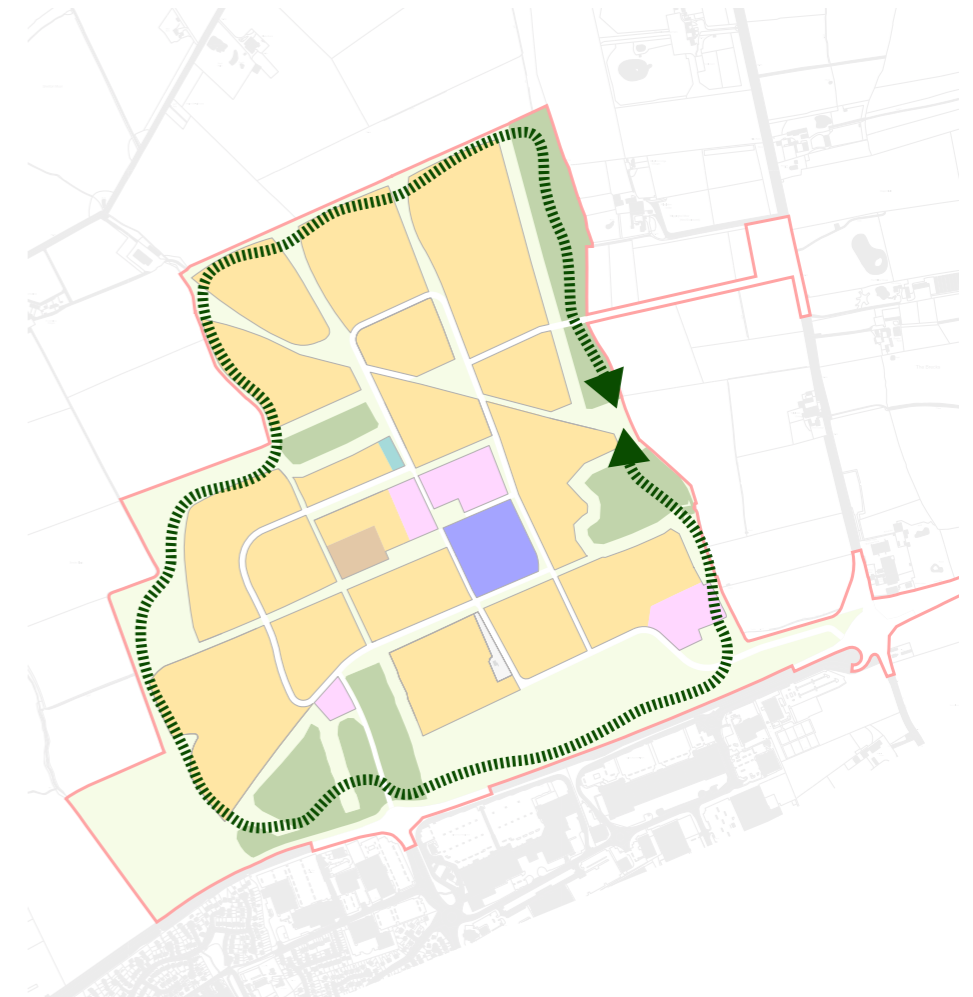
1. Green Routes Typologies



2. Exploration from Urban Centre

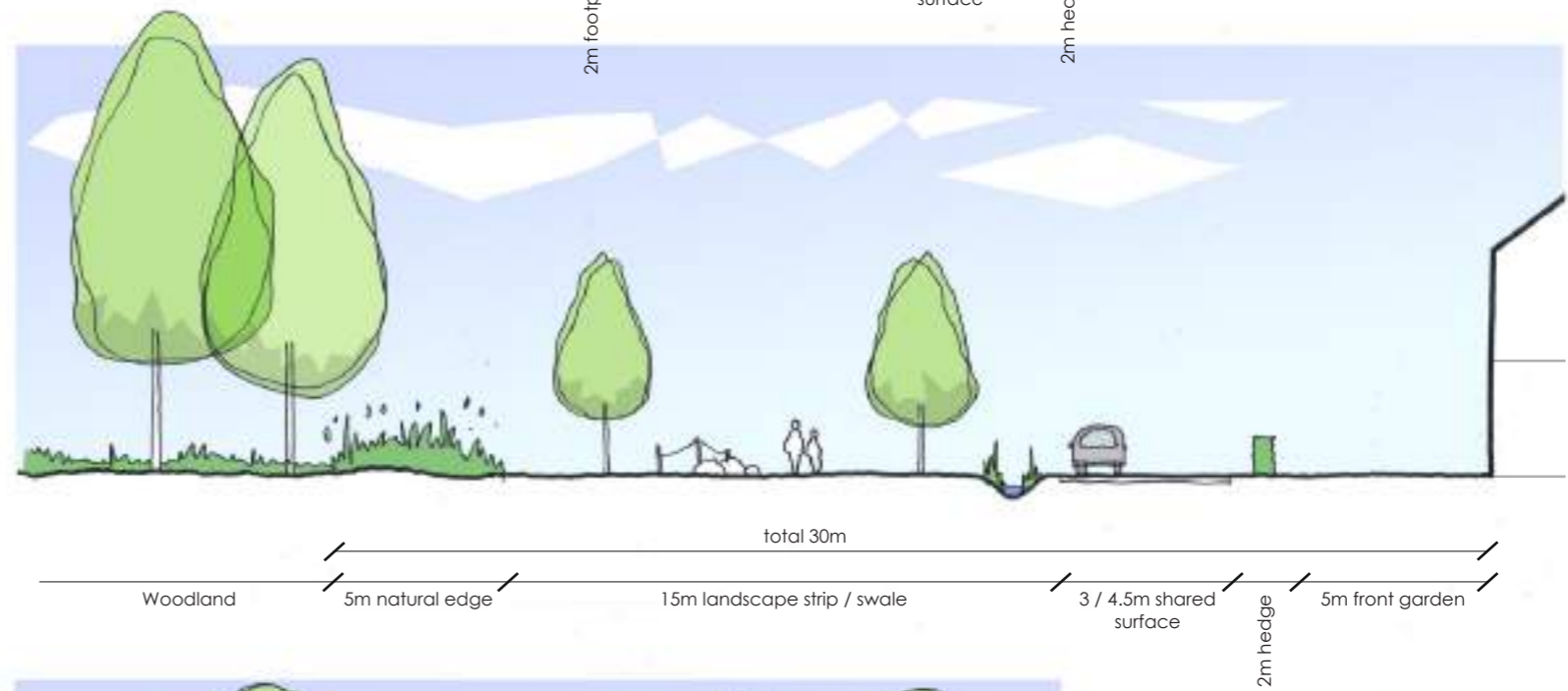
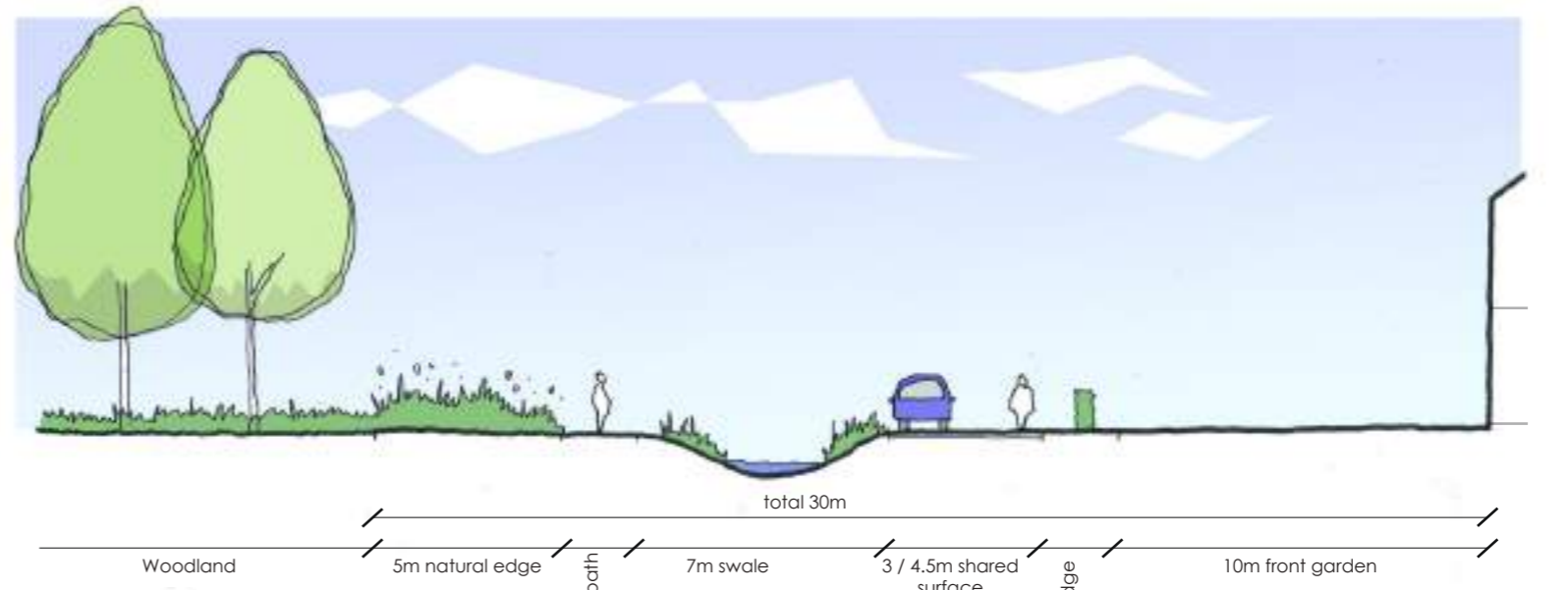
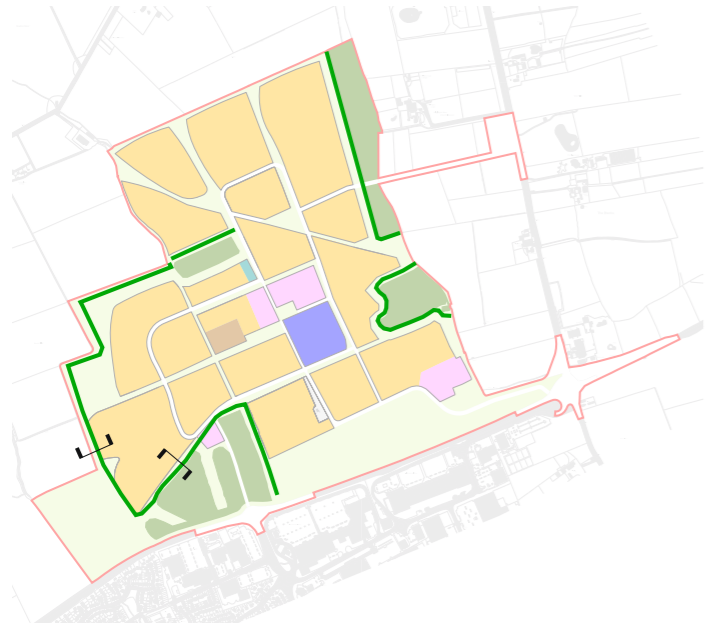


3. Peripheral Loop Linking Green Space

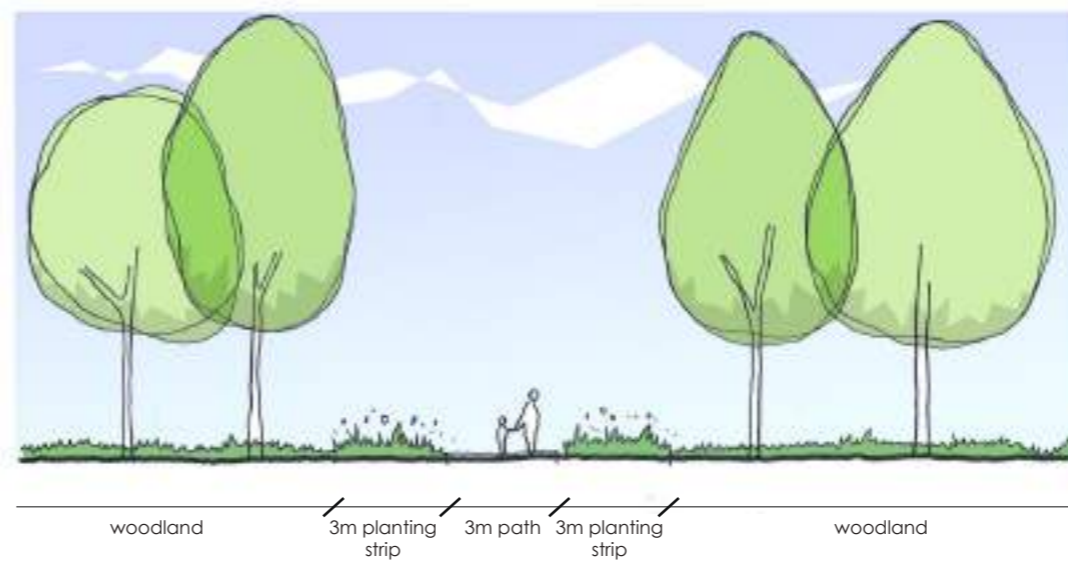


- Woodland Edge
- Woodland Path
- Stream Edge A
- Stream Edge B
- Countryside Edge
- Green Route

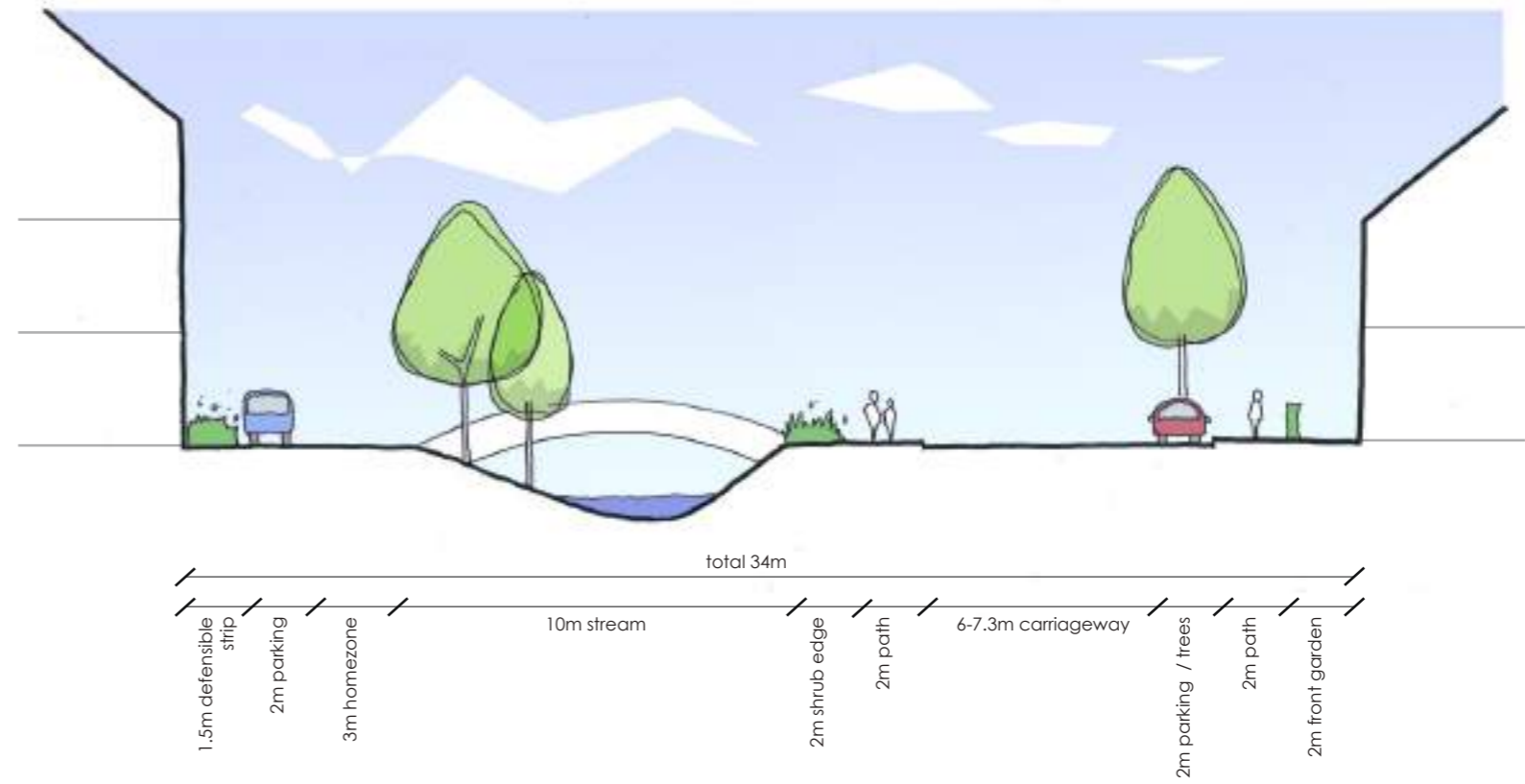
**Green Routes Typology 1:
Woodland Edge**



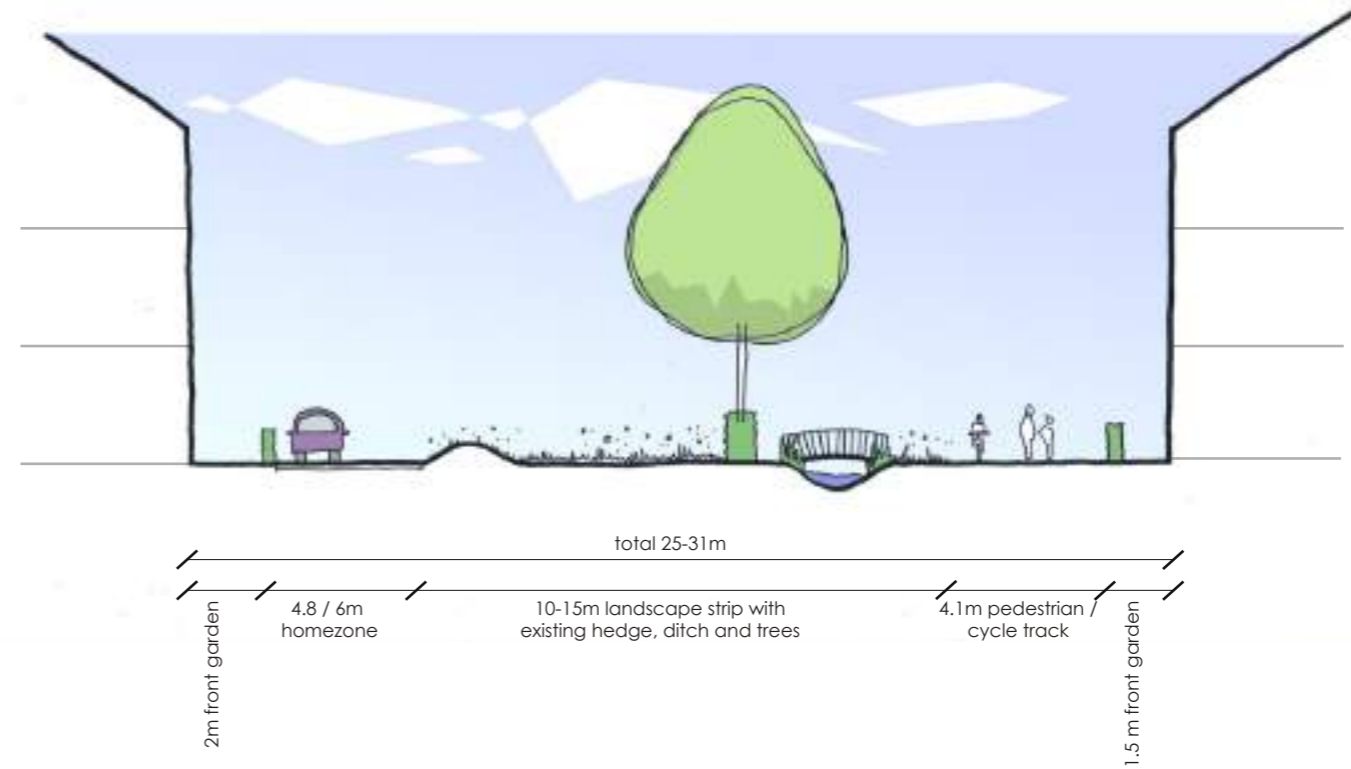
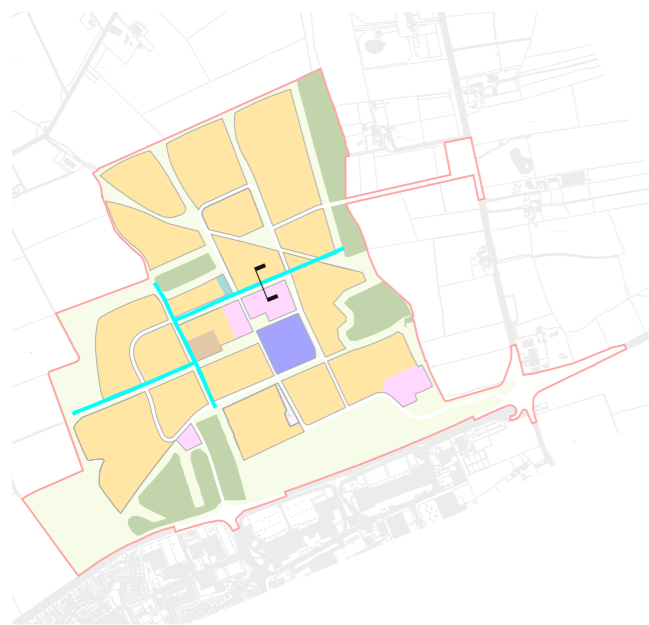
**Green Routes Typology 2:
Woodland Path**

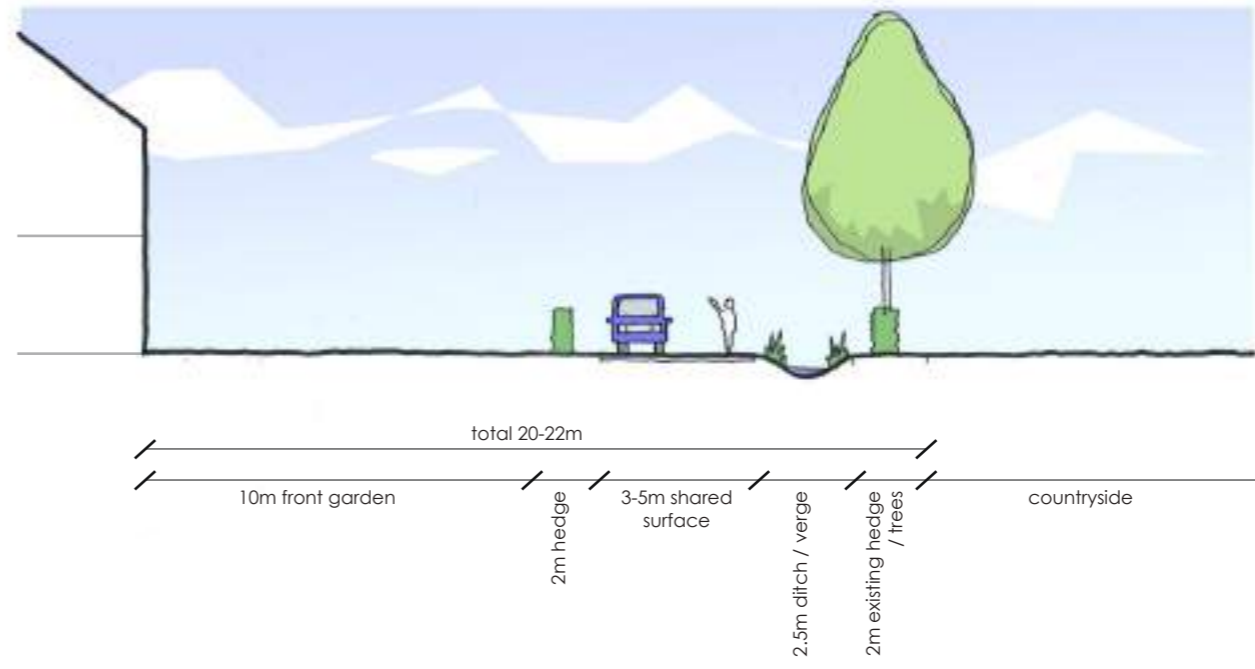
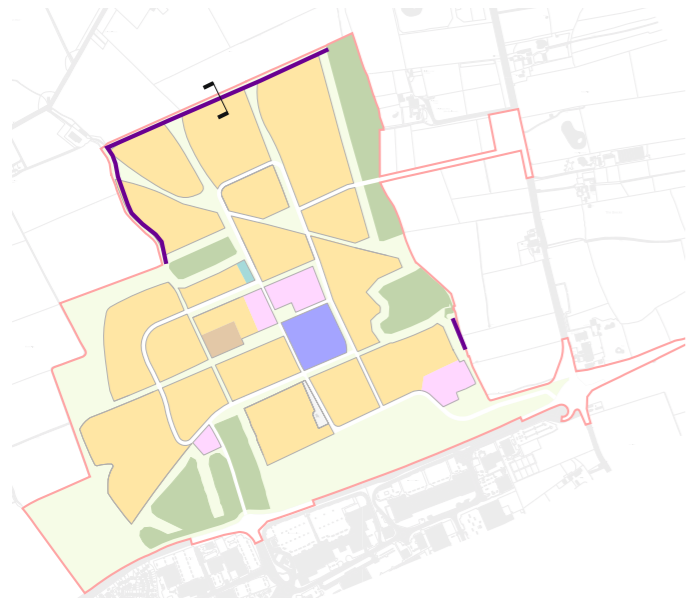


**Green Routes Typology 3:
Stream Edge A**

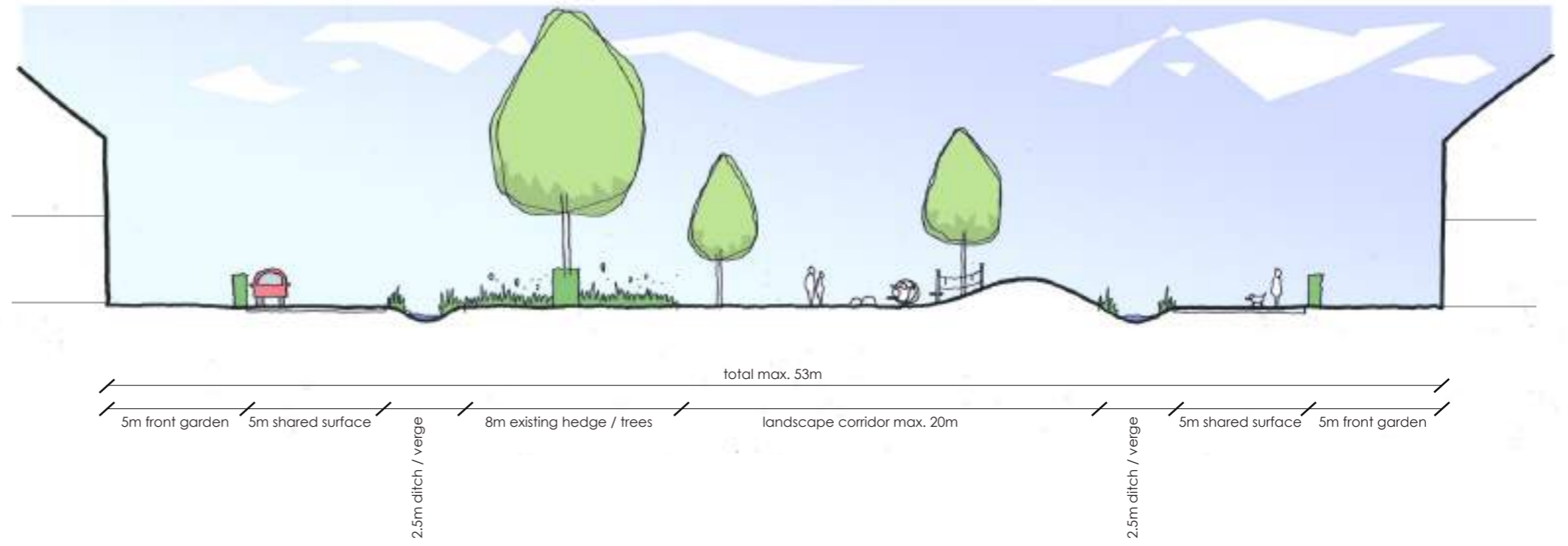
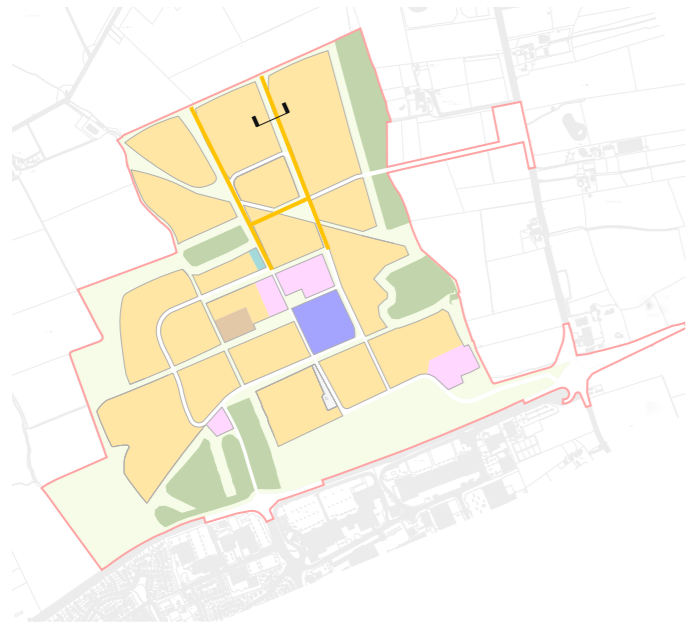


**Green Routes Typology 4:
Stream Edge B**





**Green Routes Typology 6:
Green Corridor**



Western Boundary Physical Distance from Skelton



Layout Option 1

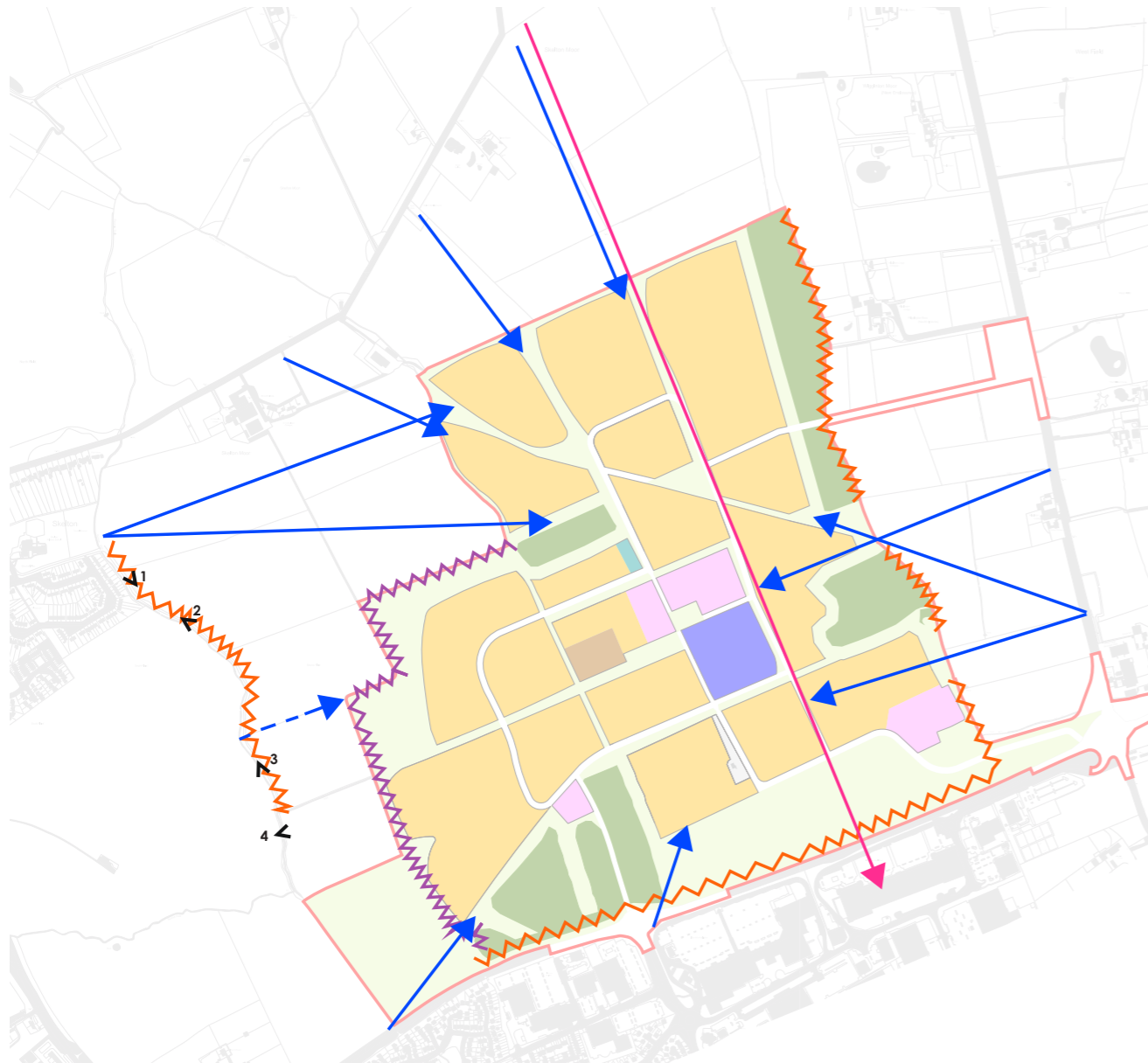
Maintain minimum **560m** open countryside between Skelton and Clifton Gate proposed site

Additional minimum **105m** open space to west of development consisting of:





- Proposed woodland buffer and semi-natural areas providing visual screening and forming a wildlife corridor linking Moor and Skelton plantations
- Sustainable Urban Drainage (SUDS) landscape features such as ditches and attenuation ponds
- Community facilities such as a cricket pitch, play areas and allotments

Total minimum 665m landscape buffer

**Western Boundary
Existing Screening Along PROW**



Key

-  Existing landscape elements screening views into site
-  Proposed landscape buffer screening views into site
-  Existing views into site
-  Existing long range views across site



View 1: Double mature hedgerow along PROW looking north towards east extent of Skelton

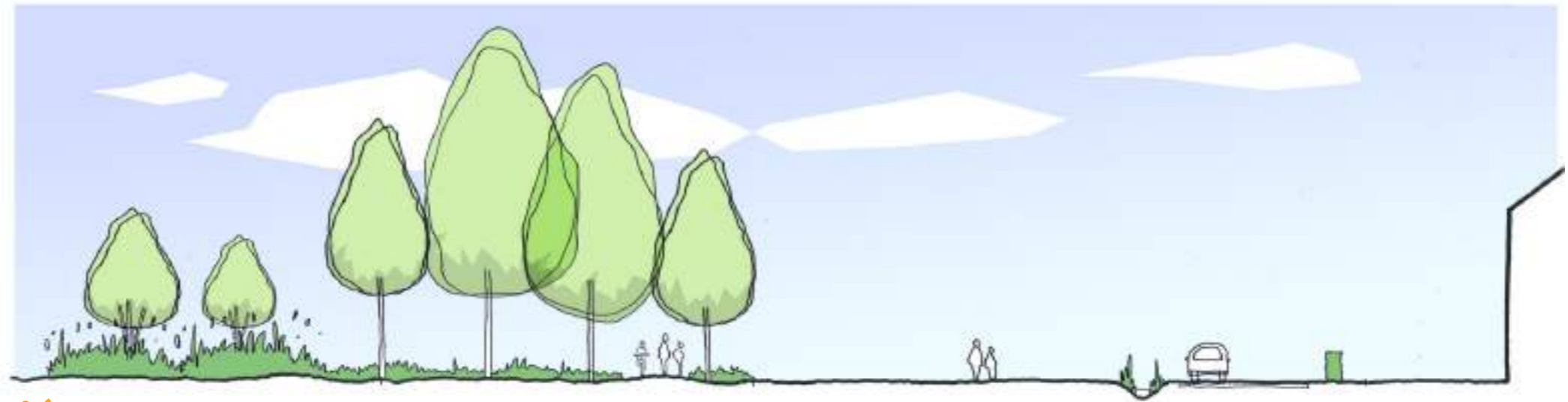
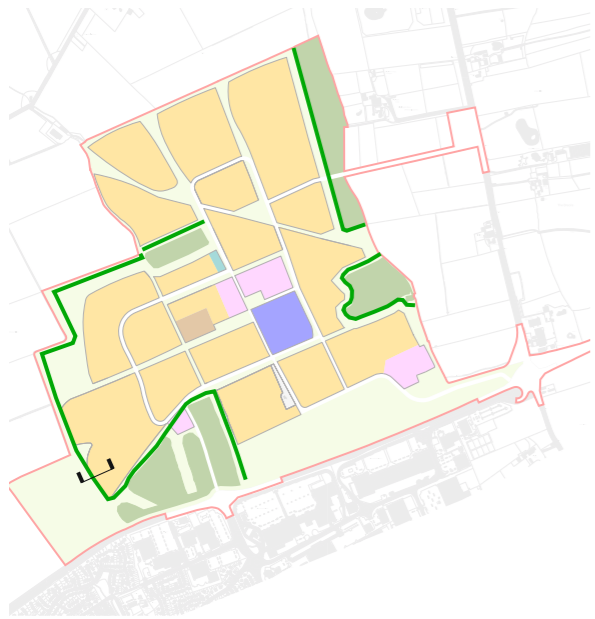
View 2: Double mature hedgerow along PROW looking south from the east extent of Skelton



View 3: Double mature hedgerow along PROW looking south towards A1237 / Clifton Moor

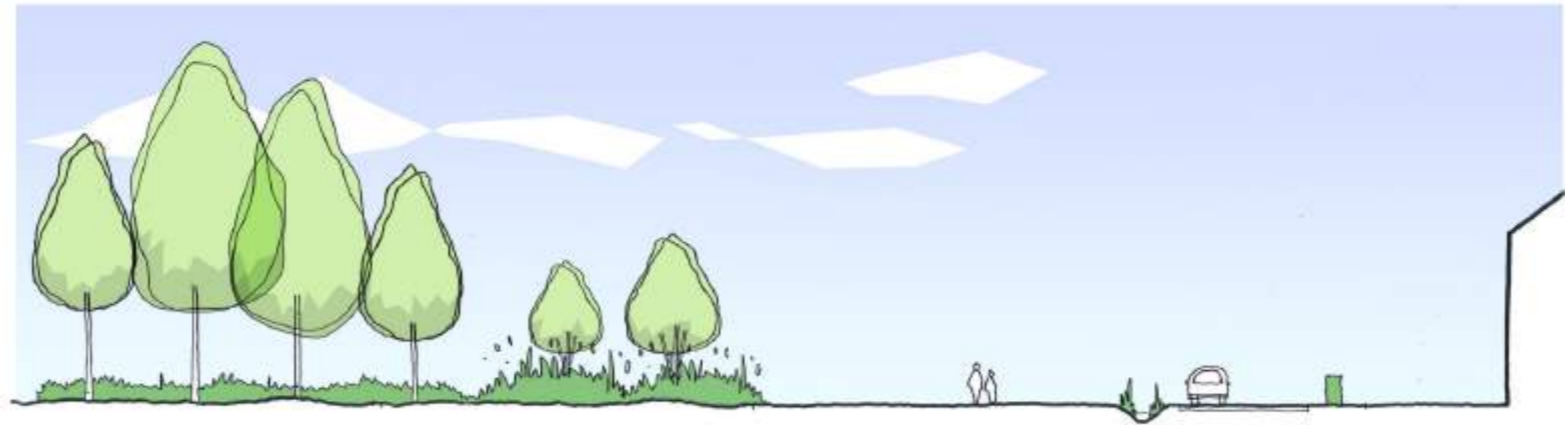
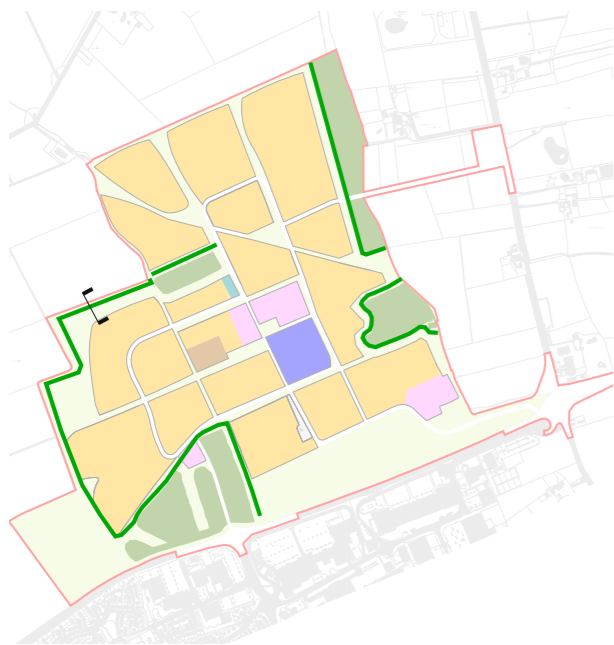
View 4: Views of development across open countryside will be screened by proposed woodland edge





S ←

- Total woodland buffer minimum 25m to provide full screening of development —
- Min. 10m natural edge; understory shrub planting mix to south - west facing edge —
- Min. 15m semi-mature woodland tree planting with nature trails as part of amenity 'Green Ring' —
- Min. 30m set back from woodland edge —



S →

- Total woodland buffer minimum 25m to provide full screening of development —
- Min. 15m semi-mature woodland tree planting —
- Min. 10m natural edge; understory shrub planting / perennial mix creates south facing ecologically rich planted buffer to south —
- Min. 30m set back from woodland edge —

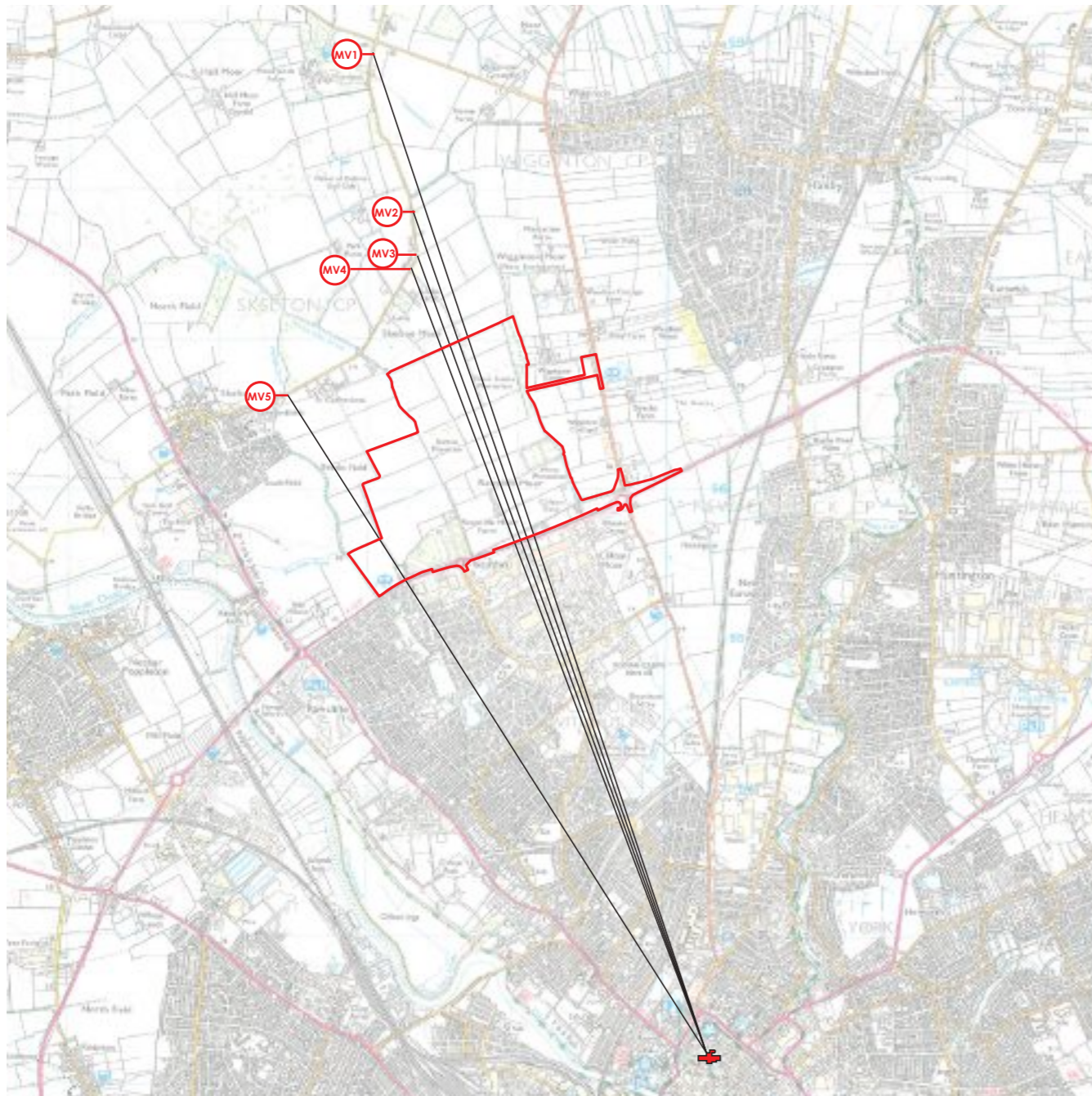


Diagram showing viewing corridor across Clifton Moor from Moor Lane PROW

Minster Viewpoints - Moor Lane

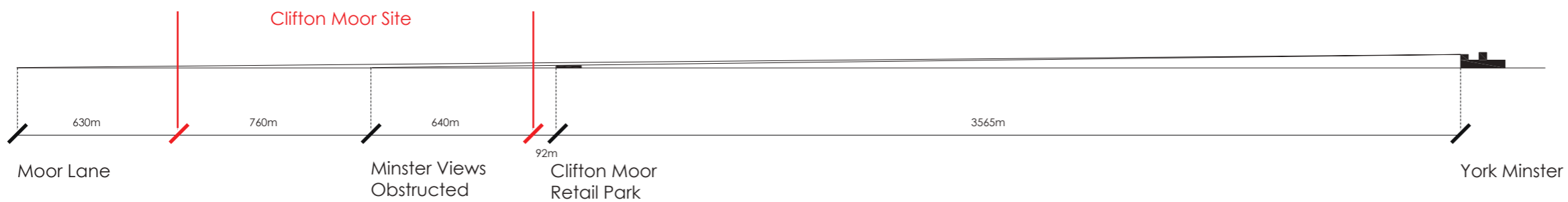
Long distance views of York Minster is available across the site at various points along Moor Lane. The diagram below plots these lines of site in relation to the development in order to inform possible viewing corridors that could be incorporated into the Clifton Gate masterplan.

- MV1:** Moor Lane, adjacent to York & District Riding Club
- MV2:** Moor Lane, adjacent to PROW
- MV3:** Moor Lane
- MV4:** Moor Lane, near Glebe Farm
- MV5:** Moor Lane adjacent to Skelton



■ Area within the site where Minster Views are obscured by Clifton Moor Retail Park buildings

Diagram showing extent of Minster views within Site



Long Section 1:20,000 @ A3


Approximate location of viewing corridor
created by N-S green link

Distant view of York Minster
obscured by development



KEY

 Approximate extent of development

 Location of York Minster in view

MV2: Moor Lane, adjacent to PROW


Views of York Minster

Approximate location of viewing corridor created by N-S green link



KEY

 Approximate extent of development

 Location of York Minster in view


Approximate location of viewing corridor created by N-S green link

Views of York Minster fully obscured by development



KEY

 Approximate extent of development

 Location of York Minster in view

View MV4: Moor Lane, near Glebe Farm


Approximate location of viewing corridor created by N-S green link

Views of York Minster fully obscured by development



KEY

 Approximate extent of development

 Location of York Minster in view


MV5: Moor Lane adjacent to Skelton

York Minster visible with extent of development located to the east



KEY

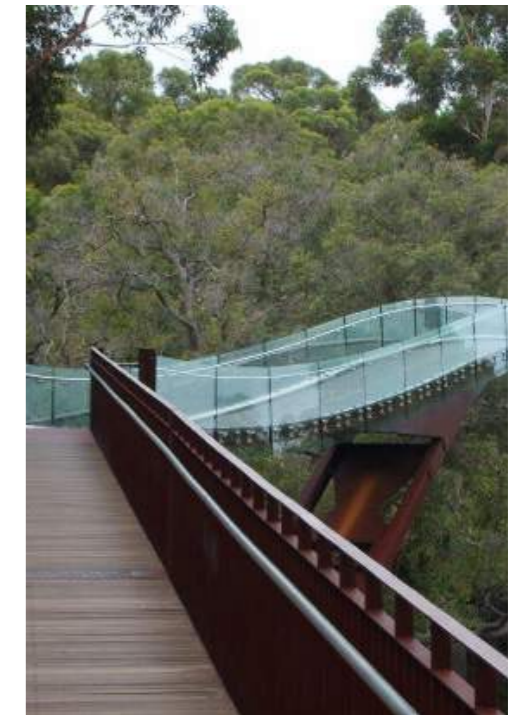
 Approximate extent of development

 Location of York Minster in view

Southern Boundary Linear Open Space



Detailed Area 1: Footbridge Walkway



Precedent images of treetop walkway

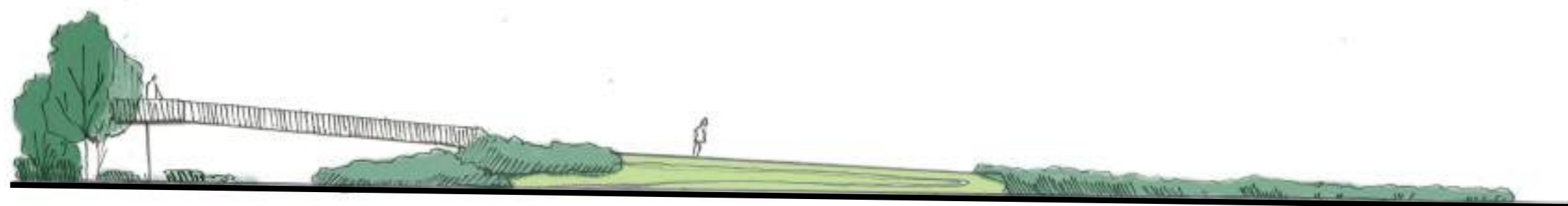
Footbridge access ramp

Proposed hedgerow

Proposed earth mounding at max 1:3 gradient

Proposed tree planting provides visual screening of ring road and retail park.

Elevated walkway

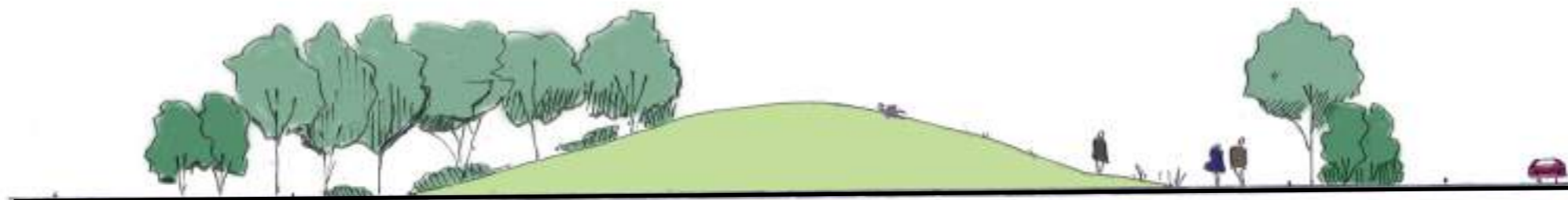


Section A Scale 1:250

Detailed Area 2: Linear Parkland



Precedent images of undulating earth bunding



Section B Scale 1:250

From: Paul Butler [paul.butler@pbplanning.co.uk]
Sent: 04 April 2018 12:09
To: localplan@york.gov.uk; Slater, Michael
Cc: Richard Wood; woolley william; Morris, Peter; Tate, Liam
Subject: CITY OF YORK LOCAL PLAN – LAND WEST OF WIGGINTON ROAD – BARRATT HOMES & DAVID WILSON HOMES AND TW FIELDS – CLIFTON GATE - SUPPORT FOR SITE REFERENCE ST14

Attachments: City of York Local Plan - Site ST14 - Clifton Gate - BDW TWF - April 2018.pdf; City of York Local Plan - Site ST14 - Clifton Gate - BDW TWF - October 2017.pdf; City of York Local Plan - Site ST14 - Clifton Gate - BDW TWF - September 2016.pdf; 00855_SK26_Land use plan_2,200 homes_D2.pdf; 00855_SK_22_Illustrative masterplan_1_10000_A3_with key_lowres.pdf; 00855_SK21_D7_Land use plan_1725 homes option_A4.pdf; 00855_SK23_D4_Land use plan_1350 homes option_A4 .pdf; City of York Local Plan - Consultation Form - Site ST14 - Clifton Gate - BDW TWF - April 2018.pdf

Categories: Purple Category

Dear Sir or Madam,

We write on behalf of our clients Barratt Homes & David Wilson Homes (BDW) and TW Fields (TWF) to provide City of York Council (CYC) with their representations to CYC's Publication Draft Local Plan (February 2018) with regards to Strategic Site Allocation Ref. ST14.

From a review of the latest version of the Local Plan, it is clear that CYC have not taken on board the evidence we previously presented in our representations to earlier versions of the Local Plan, by letters dated 12th September 2016 and 27th October 2017. Our latest enclosed representations do not seek to re-iterate the comments made to CYC in our previously submitted representations. These are enclosed, and we request that they are submitted alongside this letter to the Secretary of State as a holistic and comprehensive representation for the Land to the West of Wigginton Road (Site Ref. ST14), which we refer to as Clifton Gate.

The enclosed representations do however provide a summary of the comments previously made, before providing an update in our response to CYC's evidence base in association with the deliverability of this site and the objectively assessed housing needs of the City.

Our client's support CYC's identification of the site as a new Garden Village within the emerging City of York Local Plan. However, we wish to make it clear from the outset that we have concerns with the current red line site allocation boundary. Whilst the site can deliver 1,348 homes within the plan period within CYC's current site red line site allocation boundary, it is our view that the current boundary should be expanded in order to enhance the community and green infrastructure that the site can deliver in respect of the policy aspirations required by Policy SS12 of the Publication Draft Local Plan.

Within the submitted representations we identify that there is a legal process which CYC can undertake in order to amend the red line site allocation boundary ahead of the submission of the Local Plan to the Secretary of State.

The enclosed representations also present a compelling case for the release of additional land as housing allocations within the emerging CYC Local Plan in order to meet the City's full objectively assessed housing needs. Consequently, we have presented three potential development options to the Council to provide a new Garden Village of either 1,350 homes; 1,725 homes; or 2,200 homes alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities.

We would like to work alongside CYC to finalise the site specific strategic development policy to be included within future versions of the Local Plan. Working together we can ensure that CYC's and the local community's planning parameters for the site are deliverable. Should you require any further details or clarification on the content of this letter please do not hesitate to contact me.

Due to the size of the enclosures we submitted with our previous representations, can we please ask that CYC provide us with their file share link so that these documents can be sent through today. For the avoidance of any doubt, CYC have previously received copies of these documents. We would just like to submit them once more for completeness.

Kind regards,

Paul

Paul Butler
Director



www.pbplanning.co.uk

paul.butler@pbplanning.co.uk

07970 506702
01904 731365

PO Box 827, York, YO31 6EE

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		Paul
Last Name		Butler
Organisation (where relevant)	TW Fields and Barratt Homes - David Wilson Homes	PB Planning Ltd
Representing (if applicable)		TW Fields and Barratt Homes & David Wilson Homes
Address – line 1	c/o Agent	PO Box 827
Address – line 2		York
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		YO31 6EE
E-mail Address		paul.butler@pbplanning.co.uk
Telephone Number		07970 506702

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)

Please see enclosed submitted 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	<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.

See enclosed representations

Policy Ref.

See enclosed representations

Site Ref.

Site Ref. ST14

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 enclosed submitted representations

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 enclosed submitted 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:

Please see enclosed submitted representations

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

04.04.18

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

Local Plan,
 City of York Council,
 West Offices,
 Station Rise,
 York,
 YO1 6GA

12th September 2016

Dear Sir or Madam,

CITY OF YORK LOCAL PLAN – LAND WEST OF WIGGINTON ROAD – BARRATT HOMES & DAVID WILSON HOMES AND TW FIELDS – CLIFTON GATE - SUPPORT FOR SITE REFERENCE ST14

We write on behalf of our clients Barratt Homes & David Wilson Homes (BDW) and TW Fields (TWF) to provide City of York Council (CYC) with further information in respect of the deliverability of their land interest at Land to the West of Wigginton Road (referred to as Clifton Gate) which is currently proposed by CYC as a new garden village within the emerging City of York Local Plan. Our clients fully **support** the principle of the proposed allocation of the site by CYC within the Preferred Sites Document (July 2016).

These site specific representations should be read in conjunction with BDW’s overarching representations prepared by Barton Willmore, which make comments upon the overall soundness of the emerging CYC Local Plan, including the level of homes proposed in the plan, the use of windfall sites in meeting the Council’s housing requirement, the exclusion of safeguarded land and the site selection process.

Site ST14 – Representations Summary
<ul style="list-style-type: none"> • We fully support the principle of the proposed allocation of the site by CYC. • The allocation boundary needs to be expanded in order to deliver a minimum of 1,350 homes at the site. • Two deliverable and viable development proposals are being put forward for CYC’s consideration: <ul style="list-style-type: none"> ○ The delivery of 1,350 homes at the site alongside each of CYC’s proposed “Planning Principles”. ○ The delivery of 1,725 homes at the site to meet any potential increase in the City’s housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site. • The proposals will deliver a Garden Village design philosophy with the provision of substantial community infrastructure including a primary school, village centre and public open space and recreational facilities. • The net developable residential area of both of the proposed options is smaller than the current allocation site area prescribed by CYC. • The historic and landscape character of this area of the City will be preserved as key views to York Minster are maintained and strategically placed open space on the site’s boundaries alongside the site’s existing woodland areas will deliver permanent future boundaries to the site. • Separation distances between the site and surrounding areas are substantial. The distance between the site’s western boundary to Skelton is 1km; its eastern boundary to Wigginton Road is 600m; and its southern boundary to Clifton Moor is 460m. • Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south). Appropriate contributions will be delivered for highways upgrades. Land can also be made available for the potential future widening of the A1237. • Pedestrian and cycle connections will be provided throughout the site, with connectivity to existing links and Clifton Moor via a proposed foot bridge. • The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

Our proposals have the potential to provide for a new garden village of either 1,350 new homes or 1,725 homes, alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities. The site is strategically located to the north of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services at Clifton Moor. Importantly, there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

This letter sets out our client's design philosophy for the proposed development of a 21st Century Garden Village at the Clifton Gate site and demonstrates the site's deliverability for residential development in accordance with national planning guidance. In doing so the letter refers to the following documents which are enclosed: -

- Visual Document – JTP/Turkington – August 2016
- 1,350 Home Illustrative Masterplan – JTP – August 2016
- 1,725 Home Illustrative Masterplan – JTP – August 2016
- 1,350 Home Land Use Plan; Land Use Schedule & Key – JTP – August 2016
- 1,725 Home Land Use Plan; Land Use Schedule & Key – JTP – August 2016
- Archaeology Statement - York Archaeological Trust – August 2016
- Outline Transport Strategy Report – Fore Consulting – September 2016
- Ecology Statement – Baker Consulting – September 2016
- Utilities Statement – Arup – September 2016

The documents referenced above provide an update of the comprehensive technical reports which were previously submitted to CYC in the promotion of the larger site area. The parameters established within the comprehensive technical reports were utilised in the preparation of the new indicative masterplan for the site. Full versions of each of the above listed reports are of course available on request.

PROPOSED DEVELOPMENT OPTIONS

As identified above, there are two potential masterplan options associated with the development of the site: -

1. The delivery of 1,350 homes at the site to align with CYC's proposed housing numbers within the Preferred Sites Document. This masterplan option represents a deliverable and viable opportunity to meet CYC's current proposed housing numbers for the site, whilst also ensuring that each of CYC's proposed "Planning Principles" are delivered.
2. The delivery of 1,725 homes at the site to meet any potential increase in the City's housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC's proposed "Planning Principles" for the site. This option could also deliver an increase in economic and social benefits associated with the delivery of more homes at the site.

The vision of the proposals is to deliver a landscape led development which is separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The proposed development options have been formulated following the undertaking of ecology, landscape, Green Belt, archaeology, drainage, infrastructure and highways assessments. Both proposals seek to deliver a Garden Village development, community facilities and substantial areas of recreation and amenity space.

CYC Development Parameters

CYC's Preferred Sites Consultation document identifies the following parameters associated with the proposed development of the site: -

1. *Site Size/Developable Area – 55Ha*
2. *Indicative Site Capacity – 1,348 homes (845 within plan period)*
3. *Archetype/Density – Strategic Site – 70% net site area at 35dph*
4. *Proposed Allocation – Allocated for residential development for 1348 dwellings*
5. *Planning Principles: -*
 - a. *Deliver a sustainable housing mix in accordance with CYC’s most up to date housing needs evidence.*
 - b. *Creation of a new ‘garden’ village that reflects the existing urban form of York.*
 - c. *Create a Local Centre incorporating appropriate shops, services and community facilities.*
 - d. *Deliver on site accessible combined nursery and primary education facilities.*
 - e. *Secure developer contributions for secondary school places.*
 - f. *Ensure provision of new all-purpose access roads to the east/south from A1237 Outer Ring Road/Wigginton Road roundabout and off the Wigginton Road/B1363.*
 - g. *Deliver local capacity upgrades to the outer ring road in the vicinity of the site.*
 - h. *Opportunities to provide grade separated, dedicated public transport routes across the A1237 should be explored.*
 - i. *Deliver high quality, frequent and accessible public transport services throughout the development site.*
 - j. *Ensure the provision of high quality, safe, direct and accessible pedestrian and cycle links within the Village; to Clifton Moor via a foot bridge over the A1237; to surrounding green networks; and to existing pedestrian and cycle links.*
 - k. *Maintain landscape buffers around the site to prevent coalescence with adjacent settlements and maintain the setting of the City and the village of Skelton.*
 - l. *Create strategic greenspace to the west of the site to reduce the physical and visual proximity of the development area to Skelton.*
 - m. *Protect and enhance local green assets, trees and hedge-lines and enhance existing landscape character.*

CYC Planning Parameters Comparison with BDW & TWF Development Options

The table below provides a comparison of the CYC’s identified aspirations for the site (outlined above) against the planning principles proposed by BDW & TWF’s two development options. Evidence to substantiate the inputs are set out in further detail below and within the enclosed documentation. Particular reference should be given to the enclosed Land Use Plan, Land Use Schedule and Indicative Masterplan for each of the development options.

Ref.	CYC	BDW/TWF Option 1	BDW/TWF Option 2
1. Site Size	55Ha	65.36Ha	72.73Ha
2. Site Capacity	1,348 Homes (845 Plan Period)	1,350 Homes (All within the plan period)	1,725 Homes (1,590 within the plan period and 1,725 within one year beyond the plan period)
3. Density	Strategic Site – 70% net site area at 35dph	Garden Village – 40.02Ha net site area at 32dph	Garden Village – 51.57Ha net site area at 32dph
4. Allocation	1,348 Homes	1,350 Homes	1,725 Homes
CYC Planning Parameters			
5(a)	Sustainable Housing Mix	Site can deliver a variety of housing needs including first time buyers, detached family homes and homes for senior citizens.	Site can deliver a variety of housing needs including first time buyers, detached family homes and homes for senior citizens. Can also help to deliver additional homes should CYC’s annual housing requirement increase.
5(b)	Garden Village	60% net developable area at 32dph will ensure the delivery of a Garden Village.	60% net developable area at 32dph will ensure the delivery of a Garden Village.

5(c)	Local Centre	2.3Ha of land for a Local Centre	2.3Ha of land for a Local Centre
5(d)	Nursery/Primary Education	2.26Ha of land provided for Nursery and a two form entry Primary Education.	2.26Ha of land provided for Nursery and a two form entry Primary Education.
5(e)	Secondary Education Contributions	Appropriate contributions will be delivered for secondary education.	Appropriate contributions will be delivered for secondary education.
5(f)	New Access Roads East & South	Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south)	Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south)
5(g)	Local Highways Upgrades	Appropriate contributions will be delivered for highways upgrades. Land can also be made available for potential future widening of the A1237.	Appropriate contributions will be delivered for highways upgrades. Land can also be made available for potential future widening of the A1237.
5(h)	Dedicated Public Transport Routes	A bus route will be provided through the site, via the A1237 and Wigginton Road access points. Pedestrian/Cycle connections will be delivered to existing links with a footbridge proposed to link to Clifton Moor.	A bus route will be provided through the site, via the A1237 and Wigginton Road access points. Pedestrian//Cycle connections will be delivered to existing links with a footbridge proposed to link to Clifton Moor.
5(i)	Public Transport Services	Masterplan designed to accommodate a bus route through the site, via the A1237 and Wigginton Road access points.	Masterplan designed to accommodate a bus route through the site, via the A1237 and Wigginton Road access points.
5(j)	Pedestrian & Cycle Links	Provided throughout the site with connectivity to existing links and Clifton Moor via a proposed foot bridge.	Provided throughout the site with connectivity to existing links and Clifton Moor via a proposed foot bridge.
5(k)	Coalescence with Surrounding Settlements	Key views to York Minster are preserved. Positioning of open space on western boundary; substantial landscaping on all of the site's boundaries; and retention of existing woodland areas ensures delivery of permanent future boundaries to the site. Distance from the site's western boundary to Skelton is 1km; eastern boundary to Wigginton Road is 600m; and southern boundary to Clifton Moor is 460m	Key views to York Minster are preserved. Positioning of open space on western boundary; substantial landscaping on all of the site's boundaries; and retention of existing woodland areas ensures delivery of permanent future boundaries to the site. Distance from the site's western boundary to Skelton is 1km; eastern boundary to Wigginton Road is 600m; and southern boundary to Clifton Moor is 413m
5(l)	Green Space on Western Boundary	16.4Ha of Open Space within the site and substantial areas of green space on the site's western boundary. Distance from the site's western boundary to Skelton is 1km.	12.25Ha of Open Space within the site and substantial areas of green space on the site's western boundary. Distance from the site's western boundary to Skelton is 1km.
5(m)	Protect & Enhance Green Assets	All of the site's existing green assets are sought to be maintained and enhanced where possible.	All of the site's existing green assets are sought to be maintained and enhanced where possible.

The comparison provided in the table above establishes that BDW & TWF's development options will deliver CYC's key planning parameters as set out within the Preferred Sites Consultation document.

Though BDW & TWF support CYC's proposed allocation of the site, the evidence presented in the table above and the enclosed documentation, clearly demonstrates that the allocation boundary needs to be expanded in order to deliver a minimum of 1,350 homes at the site. This is in association with the delivery of a Garden Village design philosophy and the provision of substantial community infrastructure

including a primary school, village centre and public open space and recreational facilities. Importantly, the increase in land area would not have an impact on coalescence with surrounding settlements as a **1km** separation distance would be retained between the site and Skelton; **600m** between the site and Wigginton Road; and **460m** between the site and Clifton Moor.

One further important factor that we would like to raise CYC's attention to is the net developable area proposed within each of the two above options. CYC's proposed allocation amounts to **1,348 homes within 55ha** of land in total. It is our understanding that this area predominantly relates to the residential areas of the site, with the provision of public open space and recreational facilities being located on the site's edges, as proposed within the Preferred Sites Document. We set out in the table above, and within the enclosed land use schedules for each of the two development options, that the net developable areas for the two proposed options are **1,350 homes within 40.02Ha** of land and **1,725 homes within 51.57Ha** of land. Both areas are of course lower than that prescribed by CYC. The gross areas of land associated with both of our client's development options are above the 55ha figure, however, the additional land areas include a primary school, nursery, village centre, public open spaces and recreational facilities, including allotments. The increase in land area is entirely associated with the creation of a Garden Village which benefits from substantial community infrastructure. Creating a new settlement where people will truly want to live.

The similarities between both of BDW & TWF's development options are clear. Whilst both represent deliverable and viable development opportunities to deliver a significant proportion of the City's housing needs, the difference between the two is associated with the increase in proposed residential dwellings and, of course, the proportionate economic and social benefits associated with the delivery of more homes from the site. The two proposed development options at the site can deliver the following economic and social benefits to the City of York: -

- Creating sustainable communities through meeting market and affordable housing needs, offering existing and potential residents of the City the opportunity to live in the type of house and location they desire.
- Delivering significant financial contributions towards the improvement of the City's infrastructure including the provision of S106/CIL payments and land for the potential widening of the A1237 ring road in the future.
- New capital expenditure in the region of between £163m to £208m creating substantial direct and indirect employment opportunities of approximately 361 to 461 new jobs of which 70% are usually retained in the local area.
- Sustaining and improving the District's labour market through delivering the right homes in the right locations.
- Increasing retail and leisure expenditure in the local area by between £32m to £41m per annum, creating a potential 196 to 250 jobs in these sectors.
- Provision of funding towards public services from an estimated figure of between £12.4m to £15.8m from the Government's new homes bonuses and annual Council tax payments of between £2.07m to £2.6m per annum.

It is clear that the development of 1,350 homes or 1,725 homes as part of a new Garden Village can deliver substantial economic, social and environmental benefits to the local area and wider City.

The National Planning Policy Framework seeks to encourage sustainable growth and identifies in Paragraph 8 that economic growth, such as that which this site can deliver, can secure higher social and environmental standards. Furthermore, Paragraph 52 identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements that follow the principles of Garden Cities (or a Garden Village in this case).

Paragraph 52 of the Framework further states that in such circumstances local planning authorities should consider opportunities to provide the best way of achieving sustainable development. The remaining sections of this letter consider the economic, social and environmental impact and benefits of the proposed development options in further detail.

A NEW 21ST CENTURY YORKSHIRE GARDEN VILLAGE – PRESERVING THE CHARACTER AND SETTING OF YORK

A Vision Document, prepared jointly by JTP Architects and Turkington Martin Landscape Architects, is submitted alongside these representations. The document identifies the vision to deliver: -

A new village with its own identity and good local facilities to meet the everyday needs of residents as the community grows over time. A new village which is well-connected to the centre of York and surrounding settlements by sustainable modes of transport but clearly separated and screened from existing settlements to avoid coalescence. A place that feels a part of York but is still a separate place.

The vision for the site's development, as set out within the development masterplans which are enclosed within the document, has been prepared following a comprehensive assessment of the landscape character of the site and the surrounding areas.

One of the key characteristics of York is how the city developed out from its historic core in the form of radial corridors separated by a series of green fingers. The proposed site aligns with one of these development corridors which extends radially outwards north-west of York City Centre. The proposed development sits between two green fingers, consisting of the Ouse Corridor to the west of the site, and Bootham Stray to the east. These green fingers positively contribute towards York's green infrastructure network, enhancing the amenity and biodiversity value of existing routes into the city centre and links nature conservation sites with other open space. They also preserve the notion of approaching the city through the countryside.

The Outer Ring Road currently demarcates the urban area of York from the surrounding Green Belt countryside. Where settlements are close to this road, there is a separation distance ranging between 60m and 400m. This has the appearance of reinforcing the village character which is distinct from suburban York. This can be seen in the relationship of villages such as Poppleton, Earswick and Haxby with the ring road and the city beyond. The proposal to set the new development back 460m from the outer Ring Road as proposed would establish a village character, provide a distinct identity of the development, and reinforce the separation from the edge of York.

The built edge of the new village will be 1 kilometre from Skelton. The village will also be well screened from the east by existing mature woodland and set away from Wigginton Road; preserving the rural character of the route into the city centre.

Screening is provided by existing plantations to the east and mature hedgerows adjacent to Bur Tree Dam to the west, with proposed planting further restricting views into the site. The extent of screening landscape elements will result in distant glimpsed views into the new village centre from Wigginton Road, minimising visual impact on adjacent green corridors.

Existing fragmented woodland will be linked and strengthened with new tree planting, green spaces and sports pitches. A series of linked green spaces will encircle the village, providing recreation for the new community and ensuring a green buffer from Clifton Moor and a low density edge from the surrounding countryside. Sport pitches and school playing fields will be located between the village and Skelton to bring active uses into the open space between the two villages.

A new village centre with a cluster of local facilities around an attractive village square with a pond will provide a focus for the new village. The square will accommodate seasonal markets and events. There will also be a new cycle / footbridge link to Clifton Moor shopping centre. Small scale workshops, a health centre and older people's housing is also proposed.

Existing water features including ponds and streams will be incorporated into the new village layout. New water features relating to the Suds systems will also be added. These features will together form

an integral aspect of the new streets and open spaces adding character and drawing on precedents from surrounding villages.

Linear green spaces will run through the residential area and incorporate watercourses and existing hedgerows. These linking green spaces will create a network of pedestrian routes through the site and define individual neighbourhoods within the new development. They will accommodate a range of community and recreational facilities such as play areas and allotments. Importantly, the green corridors which run through the site have been positioned in order to preserve views of York Minster.

On account of the above we agree with CYC's conclusion that the site does not fulfil any of the five Green Belt purposes for the following reasons: -

- ***The development of the site would not result in unrestricted urban sprawl*** due to the masterplan vision of delivering a landscape character led new garden village that delivers new strong defensible landscape and greenspace boundaries;
- ***The development of the site would not result in the merging of adjacent settlements*** as the positioning of open space on the western boundary; substantial landscaping on all of the site's boundaries; and retention of existing woodland areas ensures delivery of permanent future boundaries to the site which are a distance of 1km from Skelton; 600m from Wigginton Road is; and 460m from Clifton Moor;
- ***The site does not assist in safeguarding the countryside from encroachment*** on account of the significant areas of open countryside that will remain surrounding the site, particularly to the north;
- ***The proposed development of the site will have no detrimental effect on the setting and special character of historic features*** as an assessment has been undertaken of the historic setting of York Minster and the masterplan options have been designed to preserve and where possible enhance the heritage assets within proximity of the site. Importantly, the proposed green corridors which run through the site have been positioned in order to preserve views of York Minster.
- The fifth purpose of Green Belt ***to assist in urban regeneration, by encouraging the recycling of derelict and other urban land*** is a general purpose which will not be adversely affected by the site.

SAFEGUARDING HISTORIC CHARACTER

Enclosed with these representations is an Archaeology Statement prepared by York Archaeological Trust (YAT). The enclosed statement is based on the YAT's archaeological investigations conducted in 2014. The area currently proposed for residential use was previously investigated with 48 trenches and 4 boreholes. The area identified for open space was investigated with 6 trenches. The area identified for SUDS use was investigated with 7 trenches and 6 boreholes.

The enclosed statement identifies that the site's archaeology has been affected by ploughing and extensive drainage systems across the site. YAT's opinion, supported by the City of York Archaeologist, is that there are no features or deposits identified in the evaluation exercise whose significance merits preservation in-situ. The archaeology present within the proposal site has the potential to enhance understanding of York's prehistory. The City of York Archaeologist has previously suggested that the impact of the development on this archaeology can be mitigated through an archaeological excavation and recording exercise. The City Archaeologist has also indicated that no further evaluation is necessary to inform an EIA, but it may be prudent to consider further evaluation in both the 'areas of interest' and the areas currently regarded as containing little archaeology in order to manage cost and programme risk.

Finally, there are opportunities for community engagement and outreach, both through direct involvement with archaeological work and through public lectures/press releases and publication. BDW & TWF would welcome further discussion with CYC to explore this potential.

DELIVERING A SUSTAINABLE & ACCESSIBLE SETTLEMENT

Enclosed with these representations is an Outline Transport Strategy Report prepared by Fore Consulting Limited (Fore). The document has been prepared to guide the promotion of the Clifton Gate site. It considers the strategic access and connectivity implications associated with development of up to 1,725 dwellings, and identifies a potential outline transport strategy.

The report identifies that the site is well located in relation to the existing wide range of retail and leisure uses within and adjacent to the Clifton Moor retail parks, plus employment uses at Clifton Moor industrial estate and business park. To ensure the long-term sustainability of the site, high quality, safe and convenient walking and cycling routes permeating through the allocation site will be required. These would link to new crossings on the A1237 Outer Ring Road adjacent the allocation site, and new footways and cycleways to link to the existing network of pedestrian and cycle routes linking to the city centre. To ensure permeability with surrounding areas a bus route will be provided through the site, via the A1237 and Wigginton Road access points, and pedestrian/cycle connections will be delivered to existing connections including a footbridge proposed to link to Clifton Moor.

Vehicle access would be taken from a new junction on the B1363 Wigginton Road, and a fourth arm at the A1237 Outer Ring Road / Clifton Moor Gate roundabout. Changes to the Clifton Moor Gate junction in particular will need to be carefully considered to take account of CYC's long-term aspirations to upgrade the A1237 Outer Ring Road, and potentially incorporate grade separation of pedestrian and cycle connections. As identified above, the development of the site offers the potential to make land available for the potential future widening of the A1237.

The report concludes by stating that the precise impacts, scale, form and phasing of necessary transport measures and highway works will need to be confirmed following collection of traffic data and detailed capacity assessment work that will be undertaken at the planning application stage. However, overall, it is considered that there is no reason in terms of transport and access that precludes the ST14 site from being allocated for residential use.

SAFEGUARDING BIODIVERSITY

Enclosed with these representations is an Ecology Statement prepared by Baker Consultants. The statement outlines the results of a number of ecological studies carried out at the site in 2013-2014 in order to provide an understanding of the ecological issues related to the proposed allocation. The likely ecological constraints to the allocation are also described, as are any requirements for additional survey work. Potential mitigation solutions as part of the planning and development process are also highlighted.

The enclosed report identifies that the following flora and fauna surveys have been undertaken at the Clifton Gate site: -

- Badger Surveys – November 2013;
- Winter Bird Surveys - 4 visits in November & December 2013 and January & February 2014
- Breeding Bird Surveys - Three surveys in April, May and June 2014
- Botanical survey of the Clifton Airfield SLI – May 2014
- Invertebrate survey of Clifton Airfield SLI - Two visits September 2014
- Barn owl surveys - April/May 2014
- Great crested newt surveys - Surveys during mid-March to mid-June 2014
- Reptiles surveys - Surveys during April & May 2014
- Bat activity transects & static detector installation - Three transects undertaken on and around the allocation site during April-July 2014. Static detectors placed on and around the site between April-September 2014

The results of the assessments identify that the Clifton Gate site provides habitats typical of lowland arable farmland, and the species associated with this type of landscape. Although there are features of

nature conservation interest present within the allocation site (and surrounding it), these are mostly in discrete areas of habitat rather than being present across the whole landscape.

The main habitat present – arable land – is of low nature conservation interest. The areas of hedgerow, woodland, and scrub are of greater interest and, due to their smaller size can be more easily incorporated into a residential development (and enhanced) as part of retained areas, landscaping and green infrastructure.

In terms of protected and notable species, great crested newts are known to be present locally, but are found in ponds outside of the allocation site. Bats and badgers are known to make some use of the site, but due to the dominance of the arable habitat, the levels of activity and population sizes within the area as a whole are expected to be low. A range of breeding and wintering birds is also present – but principally in defined areas of suitable habitat.

None of the ecological features outlined in this report are likely to represent a serious constraint to the development of the site. Appropriate site design and mitigation will be required, as for any project of this size – but the most adverse potential impact, habitat loss, is extremely limited due to the dominant existing arable land-use.

Careful scheme design means that a range of hedgerow, woodland and other ecological features will be retained and incorporated into the development and, in some cases, enhanced. For example, the proposed access road to the south passes through Clifton Airfield SLI, but makes use of an existing trackway to minimise any potential for ecological impacts.

The proposed variation in the number of residential units (1,348 or 1,750) is unlikely to make any significant difference to the level of ecological impact at the site. With either scheme, areas of valuable habitat will be able to be retained and suitable mitigation and enhancement provided. More important will be the suitable incorporation of ecological design principles into masterplanning and detailed site layouts, appropriate protection measures during construction, and the long-term landscape and ecological management of the site post-construction. This can be equally well delivered with either a 1,348 or 1,750 home scheme.

The statement concludes that although there are issues that would need to be dealt with during planning and construction of the site, these are reasonably standard for a development of this size and would be covered as part of the normal planning process. There is no significant ecological reason why the site should not be allocated for residential development for up to 1,725 homes.

DELIVERING NEW INFRASTRUCTURE

Enclosed with these representations is a Utilities Statement prepared by Arup, which provides an update on the assessment work which they previously undertook in 2014 in respect of the larger site allocation for circa 2,800 homes. The statement assesses likely implications of the proposed change in the size of the site and the quantum of development on Air Quality, Noise and Vibration, Flood Risk and Drainage, Geotechnical and Utilities.

The statement concludes by identifying that, based on the Environmental Statement work prepared in 2014, the site area can support a development of either 1350 dwellings or 1725 dwellings. The likely impacts of the development option would need to be validated through an updated Environmental Statement, however, the environmental effect of the development of a smaller site would of course be reduced compared to the previous 2,800 home development proposals.

The required mitigation to deliver either of the masterplan options can be provided within the site areas shown. To provide flexibility for the future approach to surface water management it would be beneficial to include additional land to provide SUDs ponds on the site's boundaries. The exact areas would be developed further thorough an updated Surface Water Strategy in due course, but additional land within the allocation would allow space for onsite surface water management.

MEETING THE CITY OF YORK'S FUTURE HOUSING NEEDS

As identified above, we believe that there is a case for the identification of additional housing allocations to those currently proposed by CYC in order to meet the City's housing needs over the proposed plan period.

BDW has instructed Barton Willmore to undertake a Technical Review of the Council's SHMA to consider the methodology that has been utilised in formulating the objectively assessed need. There are considered to be issues with the methodology that has been used and incorrect data has been used as the starting point for calculating the housing requirement for the City. Our Client therefore **objects** to the Council's objectively assessed need and considers that a more appropriate figure would range from 920 dwellings per annum to 1,070 dwellings per annum.

The identified increase in the City's housing annual housing requirement would render a need to deliver 79 to 229 more homes each year in the City over the period of 2012 to 2032. A total of **between 1,580 and 4,580** additional homes over this 20-year period. Accordingly, there is a strong planning case for the allocation of additional land for residential development, including an extension of our client's Clifton Gate site to deliver 1,725 homes.

Furthermore, Barton Willmore's representations also identify our client's **objection** to the approach taken by CYC with regard to the delivery of windfall development throughout the plan period, which currently stands at 152 dwellings per annum or approximately 18% of the City's overall housing requirement. The fundamental reason for the historically large figure of windfall site development in the City can be linked back to the lack of an adopted plan, which in turn places a huge reliance on windfall sites, as noted by CYC in paragraph 3.5 of the technical paper. There are therefore concerns that this figure is too high and a greater proportion of homes should be planned for through allocations. Such a reliance on unplanned development is contrary to the legislative provision of a plan-led system and should not form the basis of the CYC Local Plan moving forwards. Such an approach will not direct homes to those areas that have seen limited growth over recent years and have a clear need for new homes in the future.

Finally, Barton Willmore's representations also concur with concerns that PB Planning previously raised in respect of the deliverability of the York Central site. The representations share our conclusion that unless the current identified uncertainties of the site's deliverability are resolved, it is our shared view that the quantum of new homes to be delivered at York Central should be considered over and above the identification of housing allocations to meet the City's housing needs. If not, there is a real possibility that the City could fail to demonstrate the delivery of sufficient number of deliverable housing sites to meet the City's housing requirement.

When each of the above points are considered holistically, there is a compelling case for the release of additional land as housing allocations within the emerging CYC Local Plan in order to meet the City's full objectively assessed housing needs, such as an extension of our client's Clifton Gate site to deliver 1,725 homes.

DELIVERY TIMESCALES

We envisage that a planning application will be submitted by Spring 2018, following the adoption of the Local Plan.

Taking into account the proposed submission date it is currently envisaged that first dwelling completions on the site will take place in 2019/20 following the submission of an outline planning application, subsequent reserved matters applications and initial site infrastructure works.

The potential size of the site offers the opportunity for three to four house builders developing the scheme simultaneously. Therefore, it is anticipated that the development will deliver a yield of at least 120 homes per annum with the potential to deliver up to 150 homes per annum. The table below

provides the site’s cumulative dwelling delivery projection per annum that CYC can use within their forthcoming housing trajectory work. A delivery projection is provided for both of the potential Development Options for the site.

Year	Development Option 1 - No of Homes Cumulative	Development Option 2 - No of Homes Cumulative
2018/2019	0	0
2019/2020	60	60
2020/2021	180	180
2021/2022	300	300
2022/2023	420	420
2023/2024	540	540
2024/2025	660	660
2025/2026	780	780
2026/2027	900	900
2027/2028	1,020	1,020
2028/2029	1,140	1,140
2029/2030	1,260	1,260
2030/2031	1,350	1,350
2031/2032		1,470
2032/2033		1,590
2033/2034		1,725

The proposed community infrastructure and areas of public open space will be delivered commensurate with the progression of the development and made available for use as required.

The development proposals can deliver significant benefits to the City of York alongside making a significant contribution to CYC’s housing requirements over the course of the plan period. In reference to CYC’s Preferred Sites Document, it is prudent to identify that the site has the potential to deliver 1,350 to 1,590 homes over the anticipated plan period. Which is a far greater contribution to the City’s housing needs to that currently identified by CYC.

Whilst the 1,725 home option would deliver homes only one year beyond the plan period, we would like to point out the benefit that this would deliver to CYC in respect of meeting ongoing housing needs and also safeguarding the release of land from the newly defined Green Belt boundary in advance of the adoption of the next Local Plan.

DELIVERABILITY ASSESSMENT

In accordance with Footnote 11 of Paragraph 47 of the National Planning Policy Framework, we believe that the site can be considered as a **Deliverable** residential development site on account of: -

Suitability

The site is located in a suitable location for residential development now. As identified above, the development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services and there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

Availability

The site is available for development now. The site is available for residential development as there are no legal or ownership constraints as all landowners have made the land available for development. BDW & TWF have an interest in the site and by virtue of this and previous submissions are expressing an intention to develop the site for residential use.

Achievability

A viable housing development can be delivered on the site within the next five years and indeed within the first five years of the adoption of the Local Plan. BDW & TWF are seeking to develop the site for residential use. Prior to the progression of development sites, they undertake a thorough marketing and economic viability assessment for each site, including an assessment of any site specific abnormal costs. The site is considered to be achievable for residential development now as there is a realistic prospect that the site can deliver new homes within the next five years and indeed within the first five years of the adoption of the Local Plan.

Deliverability Conclusion

The site can be considered a deliverable residential development site and its release would deliver a number of significant economic, social and environmental benefits as identified above.

Furthermore, it is clear that the evidence provided within this letter and the enclosed documentation demonstrates that each of the factors raised within CYC's Interim Sustainability Appraisal (2016) will be responded to appropriately as follows: -

- The site will provide 1,350 homes to 1,750 homes which will be significantly positive for meeting the City's housing needs.
- New public transport and pedestrian/cycle access (via a new foot bridge) will be provided to existing services at Clifton Moor.
- Due to the scale of the potential development, commensurate facilities will also be provided within the new Garden Village, whilst sustainable transport links will be provided to existing routes which surround the site.
- Archaeological evaluation of the site has taken place and the required mitigation techniques have been discussed and agreed with officers of CYC.
- The development proposals have been refined to ensure that the separation distances from existing settlement areas are substantial. The closest development boundary to Skelton is 1km and there is also a 600m distance to Wigginton Road and over 400m to Clifton Moor. New and existing substantial landscaping is provided on all of the site's boundaries to ensure that views onto the new Village will be sympathetic, will reflect the existing character of the area and in some cases will help to mask views from existing settlement areas onto Clifton Moor retail and industrial park. A full landscape character analysis has also enabled the important views through the site to be preserved, including views of York Minster.
- The site is located in Flood Risk Zone 1 and the development of the site will safeguard and enhance existing features of biodiversity value where possible.

CONCLUSIONS

On the basis of the information provided within this letter, and the enclosed documentation, we wish to place on record our **support** for the proposed allocation of Land to the West of Wigginton Road which is currently proposed by CYC as a new Garden Village within the emerging City of York Local Plan.

Whilst we support the principles of the allocation of the site, we believe that amendments are required to the site's proposed boundaries in order to ensure that CYC's Garden Village philosophy for the site can be delivered alongside each of CYC's identified Planning Parameters.

Our proposals have the potential to provide a new Garden Village of either 1,350 new homes or 1,725 homes, alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities. The site is strategically located to the north of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible.

The development proposals are situated in a **suitable** and highly sustainable location and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. The site is **available** now as it is under the control of a national house builder and regional development company who are actively seeking to secure planning permission for the residential development of the site. The site can also be considered **achievable** as our clients can deliver new homes on the site within the next five years and indeed within the first five years of the Local Plan.

Finally, in respect of procedural matters, we would like to work alongside CYC to formulate a site specific strategic development policy to be included within future versions of the Local Plan. Working together we can ensure that CYC's and the local community's planning parameters for the site are deliverable.

Should you require any further details or clarification on the content of this letter please do not hesitate to contact me.

Yours sincerely,



PAUL BUTLER

Director

paul.butler@pbplanning.co.uk

Local Plan,
 City of York Council,
 West Offices,
 Station Rise,
 York,
 YO1 6GA

27th October 2017

Dear Sir or Madam,

CITY OF YORK LOCAL PLAN – LAND WEST OF WIGGINTON ROAD – BARRATT HOMES & DAVID WILSON HOMES AND TW FIELDS – CLIFTON GATE - SUPPORT FOR SITE REFERENCE ST14

We write on behalf of our clients Barratt Homes & David Wilson Homes (BDW) and TW Fields (TWF) to provide City of York Council (CYC) with further information in respect of the deliverability of their land interest at Land to the West of Wigginton Road (referred to as Clifton Gate) which is currently proposed by CYC as a new garden village within the emerging City of York Local Plan. Our clients fully **support** the principle of the proposed allocation of the site by CYC within the Pre-Publication Draft document (September 2017).

These site-specific representations provide an update of those submitted to CYC dated 12th September 2016 and should be read in conjunction with BDW’s overarching representations prepared by Barton Willmore. The Barton Willmore representations comment upon the overall soundness of the emerging CYC Local Plan, including the level of homes proposed in the plan.

Site ST14 – Representations Summary
<ul style="list-style-type: none"> • We fully support the principle of the proposed allocation of the site by CYC. • The allocation boundary needs to be expanded in order to deliver a minimum of 1,350 homes at the site. • Three deliverable and viable development proposals are being put forward for CYC’s consideration: <ul style="list-style-type: none"> ○ The delivery of 1,350 homes at the site alongside each of CYC’s proposed “Planning Principles”. ○ The delivery of 1,725 homes at the site to meet any potential increase in the City’s housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site. ○ The delivery of up to 2,200 homes at the site to meet any potential increase in the City’s housing requirements or the need to ensure permanence to the City’s Green Belt, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site. • The proposals will deliver a Garden Village design philosophy with the provision of substantial community infrastructure including a primary school, village centre, public open space and recreational facilities. • The net developable residential area of each of the proposed options are either smaller or similar in size to the current allocation site area prescribed by CYC. • The historic and landscape character of this area of the City will be preserved as key views to York Minster are maintained and strategically placed open space on the site’s boundaries alongside the site’s existing woodland areas will deliver permanent future boundaries to the site. • Separation distances between the site and surrounding areas are substantial. The distance between the site’s western boundary to Skelton is 1km; its eastern boundary to Wigginton Road is 0.6km; and its southern boundary to Clifton Moor is between 0.25km and 0.46km (depending on which site option is progressed). • Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south). Appropriate contributions will be delivered for highways upgrades. Land can also be made available for the potential future widening of the A1237.

- Pedestrian and cycle connections will be provided throughout the site, with connectivity to existing links and Clifton Moor via a proposed subway under the future upgraded A1237.
- The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

Our proposals have the potential to provide for a new garden village of either 1,350; 1,725; or up to 2,200 new homes, alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities.

The site was previously identified as strategic housing site allocation ST14 within the withdrawn City of York Publication Draft Local Plan (October 2014). At that time CYC proposed the delivery of 2,800 homes at the site. Whilst each of the development options identified below relate to a figure lower than 2,800 homes, all the technical reports associated with the development of the site were originally undertaken in relation to the larger site area. Comprehensive community consultation work with local stakeholders, including a Community Planning Weekend, was also undertaken in respect of the larger site area. Consequently, there remains the potential for the enlargement of the allocation back to the previously considered acceptable size, should CYC need to do so to meet the City's increased housing needs.

The site is strategically located to the north of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services at Clifton Moor. Importantly, there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

This letter sets out our client's design philosophy for the proposed development of a 21st Century Garden Village at the Clifton Gate site and demonstrates the site's deliverability for residential development in accordance with national planning guidance. In doing so the letter refers to the following documents which are enclosed: -

- Visual Document – JTP/Turkington – August 2016
- Illustrative Masterplan – JTP – August 2016
- 1,350 Home Land Use Plan; Land Use Schedule & Key – JTP – August 2016
- 1,725 Home Land Use Plan; Land Use Schedule & Key – JTP – August 2016
- 2,200 Home Land Use Plan; Land Use Schedule & Key – JTP – October 2017
- Archaeology Statement - York Archaeological Trust – August 2016
- Outline Transport Strategy Report – Fore Consulting – September 2016
- Ecology Statement – Baker Consulting – September 2016
- Utilities Statement – Arup – September 2016

The documents referenced above provide an update of the comprehensive technical reports which were previously submitted to CYC in the promotion of the original larger site area proposed for allocation by CYC within the withdrawn City of York Publication Draft Local Plan (October 2014). The parameters established within the comprehensive technical reports were utilised in the preparation of the new indicative masterplans for the site. Full versions of each of the above listed reports are of course available on request.

With regards to our proposed Option 2, which recommends the delivery of 1,725 homes at the site, in order to meet an evidenced increase to the City's housing requirements, CYC's Officer's endorsed an increase in the proposed site allocation from 55ha (1,348 homes) to 68ha (1,672 homes) to CYC's Local Plan Working Group on the 10th July 2017. The reasoning behind the recommendation was as follows:

“This reflects developers/landowners concerns regarding the viability/deliverability of the site and the ability to deliver the planning principles including the significant infrastructure requirements given the sites location adjacent to the A1237.”

Whilst CYC’s Officer’s recommendation wasn’t approved at the time, we believe there is still a strong case for the expansion of the site in respect of both size and housing numbers. Whilst we support CYC’s Officer’s recommendation, it remains our view that in order to deliver a truly exemplar new Garden Village, the site allocation should be expanded to **a minimum** of “72.73Ha in total and 1,725 homes (at 32dph on 53.96ha net residential developable area)” for the reasons identified within these representations; the reasoning provided by CYC’s Officers; and due to the potential need to deliver additional homes from the site to meet the increased housing needs of the City.

With regard to our proposed Option 3, the new 2,200 home opportunity for the development of the site is being put forward for CYC’s consideration on account of the potential need for additional housing numbers as result of the Government’s recent announcement associated with a standardised methodology for calculating annual housing requirements; the need for CYC to ensure enduring and permanent Green Belt boundaries beyond the plan period; and as result of CYC’s recent Housing Infrastructure Bid to the Government, which could result in an accelerated delivery of new homes at the site. The planning arguments associated with the newly proposed third option are discussed in further detail below.

PROPOSED DEVELOPMENT OPTIONS

As identified above, there are three potential masterplan options associated with the development of the site: -

1. The delivery of 1,350 homes at the site to align with CYC’s proposed housing numbers within the Pre-Publication Draft Local Plan Document. This masterplan option represents a deliverable and viable opportunity to meet CYC’s current proposed housing numbers for the site, whilst also ensuring that each of CYC’s proposed “Planning Principles” are delivered.
2. The delivery of 1,725 homes at the site to meet any potential increase in the City’s housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site. This option could also deliver an increase in economic and social benefits associated with the delivery of more homes at the site.
3. The delivery of up to 2,200 homes at the site to meet any potential increase in the City’s housing requirements or the need to ensure permanence to the City’s Green Belt, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site.

The vision of the proposals is to deliver a landscape led development which is separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The proposed development options have been formulated following the undertaking of ecology, landscape, Green Belt, archaeology, drainage, infrastructure and highways assessments. Each of the proposals seek to deliver a Garden Village development, community facilities and substantial areas of recreation and amenity space.

CYC Development Parameters

CYC’s Pre-Publication Draft consultation document identifies the following parameters associated with the proposed development of the site: -

1. *Site Size/Developable Area – 55Ha*
2. *Indicative Site Capacity – 1,348 homes (1,200 within plan period)*
3. *Archetype/Density – Strategic Site – 70% net site area at 35dph*

4. *Planning Principles: -*

- i. *Creation of a new ‘garden’ village that reflects the existing urban form of York, of the main York Urban area 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. *Create a Local Centre incorporating appropriate shops, services and community facilities to meet the needs of future residents.*
- iv. *Deliver on site accessible combined nursery and primary education facilities, which are well connected to housing by a dedicated pedestrian/cycleway.*
- v. *Secure developer contributions for secondary school places as necessary to meet the need for new places.*
- vi. *Ensure provision of new all-purpose access roads to the east/south from A1237 Outer Ring Road/Wigginton Road roundabout and off the Wigginton Road/B1363. The internal layout of any future development on the site could be such that it creates discrete sectors, each with a specific access.*
- vii. *Demonstrate that all transport issues have been addressed, in consultation with the Council as necessary, to ensure sustainable transport provision at the site is achievable. The impacts of the site individually and cumulatively with site’s ST7, ST8, ST9, ST15 and ST35 should be addressed.*
- viii. *Deliver local capacity upgrades to the outer ring road in the vicinity of the site, to include associated infrastructure to protect public transport journey times on junction approaches. Opportunities to provide grade separated, dedicated public transport routes across the A1237 should be explored in feasibility, viability and cost-benefit terms.*
- ix. *Deliver high quality, frequent and accessible public transport services throughout the development site, which provide links to other local rural communities where feasible, as well as to main employment centres. It is envisaged such measures will enable upwards of 15% of trips to be undertaken using public transport.*
- x. *To encourage the maximum take-up of more active forms of transport (walking and cycling), ensure the provision of high quality, safe, direct and accessible pedestrian and cycle links which create well-connected internal streets and walkable neighbourhoods including to:*
 - a) *the community, retail and employment facilities immediately to the south, (likely to take the form of an overbridge);*
 - b) *the surrounding green infrastructure network (with particular regard to public rights of way immediately west of the site and improvements to A1237 crossing facilities); and*
 - c) *existing pedestrian and cycle networks across the city.*
- xi. *Maintain landscape buffers around the site to prevent coalescence with adjacent settlements and maintain the setting of the City and the village of Skelton.*
- xii. *Protect and enhance local green assets, trees and hedge-lines and enhance existing landscape character.*
- xiii. *Provide open space to the west of the site to minimise the visual proximity of the development areas to Skelton.*

CYC Planning Parameters Comparison with BDW & TWF Development Options

The table below provides a comparison of the CYC’s identified aspirations for the site (outlined above) against the planning principles proposed by BDW & TWF’s three development options. Evidence to substantiate the inputs are set out in further detail below and within the enclosed documentation. Particular reference should be given to the enclosed Land Use Plan, Land Use Schedule and Indicative Masterplan for each of the development options.

Ref.	CYC	BDW/TWF Option 1	BDW/TWF Option 2	BDW/TWF Option 3
1. Site Size	55Ha	65.36Ha	77.56Ha	101.53Ha
2. Site Capacity	1,348 Homes (1,200 Plan Period)	1,350 Homes (All within the plan period)	1,725 Homes (All within the plan period)	2,200 Homes (Potential for up to 2,200 homes within the plan period)
3. Density	Strategic Site – 70% net site area at 35dph	Garden Village – Approximately 60% to 70% net developable area – 42.32Ha net site area at 32dph	Garden Village – Approximately 60% to 70% net developable area - 53.92Ha net site area at 32dph	Garden Village – Approximately 60% to 70% net developable area - 67.92Ha net site area at 32dph
CYC Planning Parameters				
4(i)	Garden Village	Approximately 60% to 70% net developable area at 32dph will ensure the delivery of a Garden Village.	Approximately 60% to 70% net developable area at 32dph will ensure the delivery of a Garden Village.	Approximately 60% to 70% net developable area at 32dph will ensure the delivery of a Garden Village.
4(ii)	Sustainable Housing Mix	Site can deliver a variety of housing needs including first time buyers, detached family homes, homes for senior citizens, build for rent and affordable housing.	Site can deliver a variety of housing needs including first time buyers, detached family homes, homes for senior citizens, build for rent and affordable housing. The site can also help to deliver additional homes should CYC's annual housing requirement increase.	Site can deliver a variety of housing needs including first time buyers, detached family homes, homes for senior citizens, build for rent and affordable housing. The site can also help to deliver additional homes should CYC's annual housing requirement increase.
4(iii)	Local Centre	2.3Ha of land for a Local Centre	2.3Ha of land for a Local Centre	2.3Ha of land for a Local Centre
4(iv)	Nursery/Primary Education	2.26Ha of land provided for Nursery and a two-form entry Primary Education.	2.26Ha of land provided for Nursery and a two-form entry Primary Education.	2.26Ha of land provided for Nursery and a three-form entry Primary Education.
4(v)	Education Contributions	Appropriate contributions will be delivered for secondary education.	Appropriate contributions will be delivered for secondary education.	Appropriate contributions will be delivered for secondary education.
4(vi)	New Access Roads East & South	Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south). For the avoidance of any doubt, no access is being proposed from the Wigginton Road/A1237 roundabout. For the avoidance of any doubt, there will be no access/egress from Moor Lane.	Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south). For the avoidance of any doubt, no access is being proposed from the Wigginton Road/A1237 roundabout. For the avoidance of any doubt, there will be no access/egress from Moor Lane	Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south). For the avoidance of any doubt, no access is being proposed from the Wigginton Road/A1237 roundabout. For the avoidance of any doubt, there will be no access/egress from Moor Lane

4(vii)	Individual & Cumulative Transport Impact	BDW/TWF will work alongside CYC and other developers where necessary in order to ensure that the individual and cumulative highways impact on the City is mitigated. Detailed discussions have already taken place with CYC to agree the site-specific access solutions for the development proposals.	BDW/TWF will work alongside CYC and other developers where necessary in order to ensure that the individual and cumulative highways impact on the City is mitigated. Detailed discussions have already taken place with CYC to agree the site-specific access solutions for the development proposals.	BDW/TWF will work alongside CYC and other developers where necessary in order to ensure that the individual and cumulative highways impact on the City is mitigated. Detailed discussions have already taken place with CYC to agree the site-specific access solutions for the development proposals.
4(viii)	Local Highways Upgrades	Appropriate contributions will be delivered for local highways upgrades linked to the development of the site. Land can also be made available for potential future widening of the A1237.	Appropriate contributions will be delivered for local highways upgrades linked to the development of the site. Land can also be made available for potential future widening of the A1237.	Appropriate contributions will be delivered for local highways upgrades linked to the development of the site. Land can also be made available for potential future widening of the A1237.
4(ix)	Dedicated Public Transport Routes	A bus route will be provided through the site, via the A1237 and Wigginton Road access points. Pedestrian/Cycle connections will be delivered to existing links via new proposed subway link to Clifton Moor at the request of CYC. The cost of which is circa £1.5m. Which provides further weight to the need to expand the size of the allocation to ensure that it remains viable.	A bus route will be provided through the site, via the A1237 and Wigginton Road access points. Pedestrian/Cycle connections will be delivered to existing links via new proposed subway link to Clifton Moor at the request of CYC. The cost of which is circa £1.5m. Which provides further weight to the need to expand the size of the allocation to ensure that it remains viable.	A bus route will be provided through the site, via the A1237 and Wigginton Road access points. Pedestrian/Cycle connections will be delivered to existing links via new proposed subway link to Clifton Moor at the request of CYC. The cost of which is circa £1.5m. Which provides further weight to the need to expand the size of the allocation to ensure that it remains viable.
4(ix)	Public Transport Services	Masterplan designed to accommodate a bus route through the site, via the A1237 and Wigginton Road access points. Discussions will take place with operators to ensure that the new route connects the site to the City and surrounding Villages.	Masterplan designed to accommodate a bus route through the site, via the A1237 and Wigginton Road access points. Discussions will take place with operators to ensure that the new route connects the site to the City and surrounding Villages.	Masterplan designed to accommodate a bus route through the site, via the A1237 and Wigginton Road access points. Discussions will take place with operators to ensure that the new route connects the site to the City and surrounding Villages.
4(x)	Pedestrian & Cycle Links	Provided throughout the site with connectivity to existing links and Clifton Moor via a new proposed subway.	Provided throughout the site with connectivity to existing links and Clifton Moor via a new proposed subway.	Provided throughout the site with connectivity to existing links and Clifton Moor via a new proposed subway.

4(xi)	Coalescence with Surrounding Settlements	Key views to York Minster are preserved. Positioning of open space on western boundary; substantial landscaping on all of the site's boundaries; and retention of existing woodland areas ensures delivery of permanent future boundaries to the site. Distance from the site's western boundary to Skelton is 1km; eastern boundary to Wigginton Road is 0.6km; and southern boundary to Clifton Moor is 0.46km	Key views to York Minster are preserved. Positioning of open space on western boundary; substantial landscaping on all of the site's boundaries; and retention of existing woodland areas ensures delivery of permanent future boundaries to the site. Distance from the site's western boundary to Skelton is 1km; eastern boundary to Wigginton Road is 0.6km; and southern boundary to Clifton Moor is 0.42km	Key views to York Minster are preserved. Positioning of open space on western boundary; substantial landscaping on all of the site's boundaries; and retention of existing woodland areas ensures delivery of permanent future boundaries to the site. Distance from the site's western boundary to Skelton is 1km; eastern boundary to Wigginton Road is 0.6km; and southern boundary to Clifton Moor is 0.25km
4(xii)	Protect/Enhance Green Assets	All of the site's existing green assets are sought to be maintained and enhanced where possible.	All of the site's existing green assets are sought to be maintained and enhanced where possible.	All of the site's existing green assets are sought to be maintained and enhanced where possible.
4(xiii)	Green Space on Western Boundary	16.52Ha of Open Space within the site and substantial areas of green space on the site's western boundary. Distance from the site's western boundary to Skelton is 1km.	Increased areas of 17.12Ha of Open Space within the site and substantial areas of green space on the site's western boundary. Distance from the site's western boundary to Skelton is 1km.	Significantly increased areas of 27.09ha of Open Space within the site, including substantial areas of green space adjacent to the site's western boundary. Distance from the site's western boundary to Skelton is 1km. Additional open space is also to be provided to the site's northern edge in order to provide a robust green wedge between the site and Moor Lane. It is envisaged that the open space in this location will be in the form of new accessible areas of woodland planting and also land available for the expansion of the existing cemetery.

The comparison provided in the table above establishes that BDW & TWF's development options will deliver CYC's key planning parameters as set out within the Pre-Publication Draft Consultation document.

In particular, the requirements to deliver a sustainable housing mix would also include an element of Built to Rent (BTR) to help increase the supply in the Private Rented Sector (PRS) which has been identified by Government as a significant element of the national housing need. Following the Montague Review in 2012 there have been a significant number of Government initiatives on BTR and the House of Commons briefing paper (June 2017) stated that *"the PRS is viewed as an essential part of a strong housing market; successive Governments have tried to create and promote a more professional PRS that is more attractive to tenants, developers and investors"*. The PRS can provide flexibility of tenure, mobility and opportunities for employees, including the Key Worker section. With regards to the Clifton Gate site, the provision of BTR will complement the more traditional housebuilder product that will be delivered across the majority of the site.

Though BDW & TWF support CYC's proposed allocation of the site, the evidence presented in the table above and the enclosed documentation, clearly demonstrates that the allocation boundary needs to be expanded in order to deliver a minimum of 1,350 homes at the site. This is in association with the delivery of a Garden Village design philosophy and the provision of substantial community infrastructure including a primary school, village centre and public open space and recreational facilities. Importantly, the increase in land area would not have an impact on coalescence with surrounding settlements as a **1km** separation distance would be retained between the site and Skelton; **0.6km** between the site and Wigginton Road; and **0.46km** between the site and Clifton Moor.

The distance between the site and Clifton Moor would reduce to a still significant **0.42km** if Option 2 was progressed, but the option would increase the open space within the proposals to **17.12ha**.

With regards to the new proposed Option 3, whilst this option would reduce the distance between the site and Clifton Moor to 0.25km (the site's least sensitive coalescence wedge), it would result in a significantly increased open space area of **27.09Ha**. Additional open spaces within this option would be provided to the site's northern edge in order to provide a robust green wedge between the site and Moor Lane. It is envisaged that the open space in this location will be in the form of new accessible areas of woodland planting and also land available for the expansion of the existing cemetery.

One further important factor that we would like to raise CYC's attention to is the net developable area proposed within each of the three above options. CYC's proposed allocation amounts to **1,348 homes within 55ha** of land in total. It is our understanding that this area predominantly relates to the residential areas of the site, with the provision of public open space and recreational facilities being located on the site's edges, as proposed within the Pre-Publication Draft Local Plan. We set out in the table above, and within the enclosed land use schedules for each of the three development options, that the net developable areas for the three proposed options are **1,350 homes within 42.32Ha** of land; **1,725 homes within 53.92Ha** of land; and **2,200 homes within 67.92ha** of land. The net developable areas of both Option 1 and Option 2 are of course lower than that prescribed by CYC. The gross areas of land associated with each of our client's development options are above the 55ha figure, however, the additional land areas include a primary school, nursery, village centre, public open spaces and recreational facilities, including allotments. The increase in land area is entirely associated with the creation of a Garden Village which benefits from substantial community infrastructure. Creating a new settlement where people will truly want to live.

The similarities between each of BDW & TWF's development options are clear. Whilst they all represent deliverable and viable development opportunities to deliver a significant proportion of the City's housing needs, the difference between the three options is associated with the increase in proposed residential dwellings and, of course, the proportionate economic and social benefits associated with the delivery of more homes from the site. The three proposed development options at the site can deliver the following economic and social benefits to the City of York: -

Socio-Economic Benefit	Option 1 1,350 Homes	Option 2 1,725 Homes	Option 3 2,200 Homes
Creating sustainable communities through meeting market and affordable housing needs, offering existing and potential residents of the City the opportunity to live in the type of house and location they desire	Including up to 405 Affordable Homes	Including up to 518 Affordable Homes	Including up to 660 Affordable Homes
Delivering significant financial contributions towards the improvement of the City's infrastructure including the provision of S106/CIL payments and land for the potential widening of the A1237 ring road in the future.	S106/CIL payments will increase proportionately for each Option		
New capital construction expenditure from private funding	£163m	£208m	£268m
Creation of substantial direct and indirect employment opportunities, including apprenticeships, of which 70% are usually retained in the local area.	361 Jobs	461 Jobs	579 Jobs
Sustaining and improving the District's labour market through delivering the right homes in the right locations.	Benefit will increase proportionately for each Option		
Increased retail and leisure expenditure in the local area per annum	£32m	£41m	£51m
Creation of additional jobs within the local retail and leisure sector	196 Jobs	250 Jobs	299 Jobs
Provision of funding towards public services from the Government's new homes bonuses	£12.4m	£15.8m	£19.2m
Provision of funding towards public services from annual Council tax payments	£2.07m	£2.6m	£3.2m
Provision of services including superfast broadband			

It is clear that all three of the proposed new Garden Village options for the Clifton Gate site can deliver substantial economic, social and environmental benefits to the local area and wider City.

The National Planning Policy Framework seeks to encourage sustainable growth and identifies in Paragraph 8 that economic growth, such as that which this site can deliver, can secure higher social and environmental standards. Furthermore, Paragraph 52 identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements that follow the principles of Garden Cities (or a Garden Village in this case).

Paragraph 52 of the Framework further states that in such circumstances local planning authorities should consider opportunities to provide the best way of achieving sustainable development. The remaining sections of this letter consider the economic, social and environmental impact and benefits of the proposed development options in further detail.

A NEW 21ST CENTURY YORKSHIRE GARDEN VILLAGE – PRESERVING THE CHARACTER AND SETTING OF YORK

A Vision Document, prepared jointly by JTP Architects and Turkington Martin Landscape Architects, is submitted alongside these representations. The document identifies the vision to deliver: -

A new village with its own identity and good local facilities to meet the everyday needs of residents as the community grows over time. A new village which is well-connected to the centre of York and surrounding settlements by sustainable modes of transport but clearly separated and screened from existing settlements to avoid coalescence. A place that feels a part of York but is still a separate place.

The vision for the site's development, as set out within the development masterplans which are enclosed within the document, has been prepared following a comprehensive assessment of the landscape character of the site and the surrounding areas.

One of the key characteristics of York is how the city developed out from its historic core in the form of radial corridors separated by a series of green fingers. The proposed site aligns with one of these

development corridors which extends radially outwards north-west of York City Centre. The proposed development sits between two green fingers, consisting of the Ouse Corridor to the west of the site, and Bootham Stray to the east. These green fingers positively contribute towards York's green infrastructure network, enhancing the amenity and biodiversity value of existing routes into the city centre and links nature conservation sites with other open space. They also preserve the notion of approaching the city through the countryside.

The Outer Ring Road currently demarcates the urban area of York from the surrounding Green Belt countryside. Where settlements are close to this road, there is a separation distance ranging between 60m and 400m. This has the appearance of reinforcing the village character which is distinct from suburban York. This can be seen in the relationship of villages such as Poppleton, Earswick and Haxby with the ring road and the city beyond. The proposal to set the new development back a distance between 250m and 460m from the outer Ring Road as proposed would establish a village character, provide a distinct identity of the development, and reinforce the separation from the edge of York.

The built edge of the new village will be 1 kilometre from Skelton in all three of the proposed development options. The village will also be well screened from the east by existing mature woodland and set away from Wigginton Road; preserving the rural character of the route into the city centre.

Screening is provided by existing plantations to the east and mature hedgerows adjacent to Bur Tree Dam to the west, with proposed planting further restricting views into the site. The extent of screening landscape elements will result in distant glimpsed views into the new village centre from Wigginton Road, minimising visual impact on adjacent green corridors.

Existing fragmented woodland will be linked and strengthened with new tree planting, green spaces and sports pitches. A series of linked green spaces will encircle the village, providing recreation for the new community and ensuring a green buffer from Clifton Moor and a low density edge from the surrounding countryside. Sport pitches and school playing fields will be located on the site's western boundary, to deliver active uses adjacent to the wider open countryside.

A new village centre with a cluster of local facilities around an attractive village square with a pond will provide a focus for the new village. The square will accommodate seasonal markets and events. There will also be a new pedestrian/cycle subway link to Clifton Moor shopping centre. Small scale workshops, a health centre and older people's housing is also proposed.

Existing water features including ponds and streams will be incorporated into the new village layout. New water features relating to the Suds systems will also be added. These features will together form an integral aspect of the new streets and open spaces adding character and drawing on precedents from surrounding villages.

Linear green spaces will run through the residential area and incorporate watercourses and existing hedgerows. These linking green spaces will create a network of pedestrian routes through the site and define individual neighbourhoods within the new development. They will accommodate a range of community and recreational facilities such as play areas and allotments. Importantly, the green corridors which run through the site have been positioned in order to preserve views of York Minster.

With regard to the proposed Option 3, additional open space is also to be provided to the site's northern edge in order to provide a robust green wedge between the site and Moor Lane. It is envisaged that the open space in this location will be in the form of new accessible areas of woodland planting and also land available for the expansion of the existing cemetery.

The developers of the site will seek to work alongside *Treemendous York* to aid their objective of planting 50,000 new trees within the City in order to promote a healthier, greener, more environmentally friendly, successful and beautiful city.

On account of the above we agree with CYC's conclusion that the site does not fulfil any of the five Green Belt purposes for the following reasons: -

- **The development of the site would not result in unrestricted urban sprawl** due to the masterplan vision of delivering a landscape character led new garden village that delivers new strong defensible landscape and greenspace boundaries;
- **The development of the site would not result in the merging of adjacent settlements** as the positioning of open space on the western boundary; substantial landscaping on all of the site's boundaries; and retention of existing woodland areas ensures delivery of permanent future boundaries to the site which are a distance of 1km from Skelton; 0.6km from Wigginton Road; and between 0.25km and 0.46km from Clifton Moor;
- **The site does not assist in safeguarding the countryside from encroachment** on account of the significant areas of open countryside that will remain surrounding the site, particularly to the north;
- **The proposed development of the site will have no detrimental effect on the setting and special character of historic features** as an assessment has been undertaken of the historic setting of York Minster and the masterplan options have been designed to preserve and where possible enhance the heritage assets within proximity of the site. Importantly, the proposed green corridors which run through the site have been positioned in order to preserve views of York Minster.
- The fifth purpose of Green Belt **to assist in urban regeneration, by encouraging the recycling of derelict and other urban land** is a general purpose which will not be adversely affected by the site.

SAFEGUARDING HISTORIC CHARACTER

Enclosed with these representations is an Archaeology Statement prepared by York Archaeological Trust (YAT). The enclosed statement is based on the YAT's archaeological investigations conducted in 2014. The area currently proposed for residential use was previously investigated with 48 trenches and 4 boreholes. The area identified for open space was investigated with 6 trenches. The area identified for SUDS use was investigated with 7 trenches and 6 boreholes.

The enclosed statement identifies that the site's archaeology has been affected by ploughing and extensive drainage systems across the site. YAT's opinion, supported by the City of York Archaeologist, is that there are no features or deposits identified in the evaluation exercise whose significance merits preservation in-situ. The archaeology present within the proposal site has the potential to enhance understanding of York's prehistory. The City of York Archaeologist has previously suggested that the impact of the development on this archaeology can be mitigated through an archaeological excavation and recording exercise. The City Archaeologist has also indicated that no further evaluation is necessary to inform an EIA, but it may be prudent to consider further evaluation in both the 'areas of interest' and the areas currently regarded as containing little archaeology in order to manage cost and programme risk.

Finally, there are opportunities for community engagement and outreach, both through direct involvement with archaeological work and through public lectures/press releases and publication. BDW & TWF would welcome further discussion with CYC to explore this potential.

DELIVERING A SUSTAINABLE & ACCESSIBLE SETTLEMENT

Enclosed with these representations is an Outline Transport Strategy Report prepared by Fore Consulting Limited (Fore). The document has been prepared to guide the promotion of the Clifton Gate site. It considers the strategic access and connectivity implications associated with development of up to 1,725 dwellings, and identifies a potential outline transport strategy. Whilst the document considers a development of up to 1,725 homes at the site, it is considered that the transport strategy identified within the statement can be upgraded to ensure an accessible and sustainable development of up to 2,200 homes at the site.

The report identifies that the site is well located in relation to the existing wide range of retail and leisure uses within and adjacent to the Clifton Moor retail parks, plus employment uses at Clifton Moor industrial estate and business park. To ensure the long-term sustainability of the site, high quality, safe and convenient walking and cycling routes permeating through the allocation site will be required. These would link to new crossings on the A1237 Outer Ring Road adjacent the allocation site, and new footways and cycleways to link to the existing network of pedestrian and cycle routes linking to the city centre. To ensure permeability with surrounding areas a bus route will be provided through the site, via the A1237 and Wigginton Road access points, and pedestrian/cycle connections will be delivered to existing connections including a new subway under the A1237 Outer Ring Road proposed to link the site to Clifton Moor.

Vehicle access would be taken from a new junction on the B1363 Wigginton Road, and a fourth arm at the A1237 Outer Ring Road / Clifton Moor Gate roundabout. Changes to the Clifton Moor Gate junction in particular will need to be carefully considered to take account of CYC's long-term aspirations to upgrade the A1237 Outer Ring Road, and potentially incorporate grade separation of pedestrian and cycle connections. As identified above, the development of the site offers the potential to make land available for the potential future widening of the A1237.

The proposals will also encourage green transport options in the form of car sharing and vehicle charging points.

The report concludes by stating that the precise impacts, scale, form and phasing of necessary transport measures and highway works will need to be confirmed following collection of traffic data and detailed capacity assessment work that will be undertaken at the planning application stage. However, overall, it is considered that there is no reason in terms of transport and access that precludes the ST14 site from being allocated for residential use.

SAFEGUARDING BIODIVERSITY

Enclosed with these representations is an Ecology Statement prepared by Baker Consultants. The statement outlines the results of a number of ecological studies carried out at the site in 2013-2014 in order to provide an understanding of the ecological issues related to the proposed allocation. The likely ecological constraints to the allocation are also described, as are any requirements for additional survey work. Potential mitigation solutions as part of the planning and development process are also highlighted.

The enclosed report identifies that the following flora and fauna surveys have been undertaken at the Clifton Gate site: -

- Badger Surveys – November 2013;
- Winter Bird Surveys - 4 visits in November & December 2013 and January & February 2014
- Breeding Bird Surveys - Three surveys in April, May and June 2014
- Botanical survey of the Clifton Airfield SLI – May 2014
- Invertebrate survey of Clifton Airfield SLI - Two visits September 2014
- Barn owl surveys - April/May 2014
- Great crested newt surveys - Surveys during mid-March to mid-June 2014
- Reptiles surveys - Surveys during April & May 2014
- Bat activity transects & static detector installation - Three transects undertaken on and around the allocation site during April-July 2014. Static detectors placed on and around the site between April-September 2014

The results of the assessments identify that the Clifton Gate site provides habitats typical of lowland arable farmland, and the species associated with this type of landscape. Although there are features of nature conservation interest present within the allocation site (and surrounding it), these are mostly in discrete areas of habitat rather than being present across the whole landscape.

The main habitat present – arable land – is of low nature conservation interest. The areas of hedgerow, woodland, and scrub are of greater interest and, due to their smaller size can be more easily incorporated into a residential development (and enhanced) as part of retained areas, landscaping and green infrastructure.

In terms of protected and notable species, great crested newts are known to be present locally, but are found in ponds outside of the original larger allocation site. Bats and badgers are known to make some use of the site, but due to the dominance of the arable habitat, the levels of activity and population sizes within the area as a whole are expected to be low. A range of breeding and wintering birds is also present – but principally in defined areas of suitable habitat.

None of the ecological features outlined in this report are likely to represent a serious constraint to the development of the site. Appropriate site design and mitigation will be required, as for any project of this size – but the most adverse potential impact, habitat loss, is extremely limited due to the dominant existing arable land-use.

Careful scheme design means that a range of hedgerow, woodland and other ecological features will be retained and incorporated into the development and, in some cases, enhanced. For example, the proposed access road to the south passes through Clifton Airfield SLI, but makes use of an existing trackway to minimise any potential for ecological impacts.

The proposed variation in the number of residential units (1,350; 1,750; or 2,200) is unlikely to make any significant difference to the level of ecological impact at the site. With any of the three schemes, areas of valuable habitat will be able to be retained and suitable mitigation and enhancement provided. More important will be the suitable incorporation of ecological design principles into masterplanning and detailed site layouts, appropriate protection measures during construction, and the long-term landscape and ecological management of the site post-construction. This can be equally well delivered within any of the three options proposed.

With regard to the proposed Option 3, additional open space is also to be provided to the site's northern edge in order to provide a robust green wedge between the site and Moor Lane. It is envisaged that the open space in this location will be in the form of new accessible areas of woodland planting and also land available for the expansion of the existing cemetery.

The developers of the site will seek to work alongside *Tremendous York* to aid their objective of planting 50,000 new trees within the City in order to promote a healthier, greener, more environmentally friendly, successful and beautiful city.

The statement concludes that although there are issues that would need to be dealt with during planning and construction of the site, these are reasonably standard for a development of this size and would be covered as part of the normal planning process. There is no significant ecological reason why the site should not be allocated for residential development for up to 2,200 homes if required.

DELIVERING NEW INFRASTRUCTURE

Enclosed with these representations is a Utilities Statement prepared by Arup, which provides an update on the assessment work which they previously undertook in 2014 in respect of the larger site allocation for circa 2,800 homes. The statement assesses likely implications of the proposed change in the size of the site and the quantum of development on Air Quality, Noise and Vibration, Flood Risk and Drainage, Geotechnical and Utilities.

The statement concludes by identifying that, based on the Environmental Statement work prepared in 2014, the site area can support a development of 1350 dwellings; 1725 dwellings; or 2,200 dwellings. The likely impacts of the development option would need to be validated through an updated Environmental Statement, however, the environmental effect of the development of a smaller site would of course be reduced compared to the previous 2,800 home development proposals.

The required mitigation to deliver any of the masterplan options can be provided within the site areas shown. To provide flexibility for the future approach to surface water management it would be beneficial to include additional land to provide SUDs ponds on the site's boundaries. The exact areas would be developed further through an updated Surface Water Strategy in due course, but additional land within the allocation would allow space for onsite surface water management.

MEETING THE CITY OF YORK'S FUTURE HOUSING NEEDS

As identified above, we believe that there is a case for the identification of additional housing allocations to those currently proposed by CYC in order to meet the City's housing needs over the proposed plan period.

BDW have previously instructed Barton Willmore to undertake a Technical Review of the Council's SHMA and the SHMA addendum, which was prepared by GL Hearn in June 2016, to assess the Council's methodology that has been utilised in formulating the objectively assessed need (OAN).

At present the Council have decided to progress with a housing target which is based solely on the baseline figure which is derived from the ONS 2014-based sub-national household projections and does not include the 10% uplift for market signals which is advised within the Council's latest SHMA.

By omitting the 10% uplift, and not progressing with a housing requirement of 953 dwellings per annum, the Council are failing to meet their full OAN, as required by the Framework and the Planning Practice Guidance (PPG). There are considered to be no overarching constraints within the District that justify the Council not delivering their full OAN. This approach fails to meet any of the tests of soundness set out in paragraph 182 of the Framework as the Local Plan is not positively prepared; justified; effective and consistent with national policy.

No evidence has been provided by the Council to justify the removal of the SHMA's proposed 10% uplift for market signals and it is assumed that this has been viewed as a way of reducing the overall housing target. This is unacceptable and is not a sound and robust means of preparing a Local Plan.

The Government's recent consultation document "*Planning for the Right Homes in the Right Places*" (September 2017) identifies a proposed standardised methodology for the calculation of the baseline OAN for each of the Country's Local Authority areas. Importantly, the guidance identifies in Table 1 on Page 22 of the document that in the circumstance when a Local Authority's Local Plan has not progressed to the submission of the Local Plan by the 31st March 2018 then the proposed standardised methodology should be utilised.

The Government's proposed standardised methodology includes for an uplift for market signals over and above the baseline figure and in the specific case of York, would lead to a housing requirement of 1,070 dwellings per annum. Although the methodology is subject to consultation and therefore carries limited weight at this time, it provides an indication as to how the Government considers housing requirements should be calculated, and the consideration of market signals is a key issue.

Barton Willmore's own Technical Review of the Council's SHMA as part of their "*Open House*" OAN model work, concluded that when a Market Signals Uplift is included, the full objectively assessed need is considered to range between 920 dwellings per annum and 1,070 dwellings per annum. The higher end of Barton Willmore's threshold therefore directly aligns with the figure that is generated when utilising the Government's standardised OAN methodology.

The Council are now in a position where their own evidence; Barton Willmore's Open House work; and the Government's proposed standardised methodology, all state that an uplift for market signals should be added to the baseline figure, and all of which indicate that the true full OAN is greater than the 867 dwellings per annum which is being proposed.

Therefore, in order to make the plan sound, the housing figure should be adjusted upwards to consider market signals. This in turn will require additional sites to be allocated for residential development.

Our clients are also concerned with the approach taken by CYC with regard to the delivery of windfall development throughout the plan period, which currently stands at 169 dwellings per annum or approximately 19% of the City's overall annual housing requirement. Such a reliance on unplanned development is contrary to the legislative provision of a plan-led system and should not form the basis of the CYC Local Plan moving forwards. Such an approach will not direct homes to those areas that have seen limited growth over recent years and have a clear need for new homes in the future. It is also highly likely that no affordable housing will be provided on windfall sites located in the Urban Area on account of the 15-dwelling threshold proposed in draft Policy H10.

There are also concerns associated with the deliverability of the York Central and Barrack sites. In respect of York Central this relates to uncertainties over the timescales associated with the site's initial infrastructure works and the final quantum of new homes that can be delivered at the site. With regard to the Barrack sites, the concerns relate to *when* and *if* both of the sites will become available for development within the plan period. Unless these current uncertainties are resolved, it is our view that the quantum of new homes to be delivered at these sites should be considered over and above the identification of housing allocations to meet the City's housing needs. If not, there is a real possibility that the City could fail to demonstrate the delivery of sufficient number of deliverable housing sites to meet the City's housing requirement.

Finally, the Pre-Publication Draft Local Plan is relatively silent in respect of the provision of Safeguarded Land and the role this plays in ensuring long term permanence to the Green Belt. Paragraph 85 of the Framework identifies that where necessary LPA's need to plan for longer term development needs "*stretching well beyond the plan period*" through the designation of Safeguarded Land. There are varying examples within recently approved Development Plan documents of what a timescale of "*well beyond the plan period*" can equate to which differ between an additional 10% of land allocations; an additional 5 years' worth of land; or in some cases 10 years' worth of land. It could be argued the greater amount of safeguarded land identified, the greater permanence can be provided to the Green Belt.

In respect of the Clifton Gate site, we support the Council's approach that the larger strategic site allocations will contribute to delivering long term Green Belt permanence where they will deliver homes beyond the initial plan period. An increase of the Clifton Gate site to 2,200 new homes in size as proposed within these representations would make an additional valuable contribution towards providing enduring Green Belt boundaries for the City well beyond the plan period.

In conclusion, when each of the above points are considered holistically, there is a compelling case for the release of additional land as housing allocations within the emerging CYC Local Plan in order to meet the City's full objectively assessed housing needs, such as an extension of our client's Clifton Gate site to deliver at least 1,725 homes.

HOUSING INFRASTRUCTURE FUND BID – SEPTEMBER 2017

CYC recently submitted a Housing Infrastructure Fund (HIF) bid to the Government with the aim of accelerating the delivery of new homes from the site within the plan period.

The Council's bid requested £9.845m funding towards the provision of the site's initial highways infrastructure in order to accelerate the delivery of homes at the site, providing an additional 280 homes on site by 2022/2023 and the delivery of all 1,350 homes by 2028/2029.

The HIF funding would enable the delivery of both of the two proposed access points for the site at commencement of development, meaning that the site's delivery will be developed by four separate house builder outlets immediately. Without the requested funding from the HIF only one access point would be delivered on account of cash flow/return on capital expenditure matters, resulting in the commencement of development from two house builder outlets for the first few years.

At present it is anticipated that the development will deliver a yield of at least 120 homes per annum with the potential to deliver up to 150 homes per annum. However, should CYC's HIF bid be successful, this could potentially deliver up to 200 homes in the early stages of the development on account of latent demand and four house builders developing from the site immediately.

The proposed community infrastructure and areas of public open space will be delivered commensurate with the progression of the development and made available for use as required. Meaning the accelerated housing deliver would also deliver the development's community infrastructure (Primary Schools, Village Centre, Health Centre, Elderly Care Homes) much quicker as well.

On account of the substantial initial site infrastructure requirements and costs, the delivery of new homes from the site will not reach its maximum potential for a 2 to 3-year period. Accordingly, the requested funding will enable the acceleration of housing delivery within the first year of the receipt of planning permission.

Should the Council's HIF bid be successful our client's Development Options 2 & 3 would clearly become fully deliverable within the proposed plan period. Which along with the evidence provided above in respect of housing needs and safeguarded land, provides a further planning argument associated with the allocation of our client's larger development options for the site.

DELIVERY TIMESCALES

We envisage that a planning application will be submitted in 2019, following the adoption of the Local Plan. Taking into account the proposed submission date it is currently envisaged that first dwelling completions on the site will take place in 2019/20 following the submission of a hybrid planning application and initial site infrastructure works.

The potential size of the site offers the opportunity for three to four house builders developing the scheme simultaneously. Therefore, it is anticipated that the development will deliver a yield of at least 120 homes per annum with the potential to deliver up to 150 homes per annum. The table below provides the site's cumulative dwelling delivery projection per annum that CYC can use within their forthcoming housing trajectory work. A delivery projection is provided for each of the potential Development Options for the site.

Year	Development Option 1 - No of Homes Cumulative	Development Option 2 - No of Homes Cumulative	Development Option 3 - No of Homes Cumulative
2018/2019	0	0	0
2019/2020	60	60	60
2020/2021	180	180	180
2021/2022	300	300	300
2022/2023	420	420	420
2023/2024	540	540	540
2024/2025	660	660	660
2025/2026	780	780	780
2026/2027	900	900	900
2027/2028	1,020	1,020	1,020
2028/2029	1,140	1,140	1,140
2029/2030	1,260	1,260	1,260
2030/2031	1,350	1,350	1,350
2031/2032		1,470	1,470
2032/2033		1,590	1,590
2033/2034		1,725	1,710
2034/2035			1,830
2035/2036			1,950
2036/2037			2,070
2038/2039			2,200
2039/2040			

N.B Delivery within the early years of the development could be greatly enhanced by the provision of additional care home facilities before 2020/2021 and Build for Rent before 2022/2023. With regard to proposed Option 3, this would result in the delivery of 2,200 homes entirely within the plan period.

The proposed community infrastructure and areas of public open space will be delivered commensurate with the progression of the development and made available for use as required.

The development proposals can deliver significant benefits to the City of York alongside making a significant contribution to CYC's housing requirements over the course of the plan period. In reference to CYC's Pre-Publication Draft consultation document, it is prudent to identify that the site has the potential to deliver at least 1,350 to 1,725 homes over the anticipated plan period.

Whilst the proposed Option 3 would deliver an additional 490 homes within the first four years beyond the plan period, we would like to point out the benefit that this would deliver to CYC in respect of meeting ongoing housing needs and also safeguarding the release of land from the newly defined Green Belt boundary in advance of the adoption of the next Local Plan.

Furthermore, the housing delivery rates identified within the table above are based on an annual delivery rate of 120 homes per annum. This figure could easily increase to 150 homes per annum in years of peak delivery. Further accelerated delivery above this figure can also be predicted should CYC's Housing Infrastructure Fund bid for the site prove successful.

DELIVERABILITY ASSESSMENT

In accordance with Footnote 11 of Paragraph 47 of the National Planning Policy Framework, we believe that the site can be considered as a **Deliverable** residential development site on account of: -

Suitability

The site is located in a suitable location for residential development now. As identified above, the development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services and there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

Availability

The site is available for development now. The site is available for residential development as there are no legal or ownership constraints as all landowners have made the land available for development. BDW & TWF have an interest in the site and by virtue of this and previous submissions are expressing an intention to develop the site for residential use.

Achievability

A viable housing development can be delivered on the site within the next five years and indeed within the first five years of the adoption of the Local Plan. BDW & TWF are seeking to develop the site for residential use. Prior to the progression of development sites, they undertake a thorough marketing and economic viability assessment for each site, including an assessment of any site specific abnormal costs. The site is considered to be achievable for residential development now as there is a realistic prospect that the site can deliver new homes within the next five years and indeed within the first five years of the adoption of the Local Plan.

Deliverability Conclusion

The site can be considered a deliverable residential development site and its release would deliver a number of significant economic, social and environmental benefits as identified above.

CONCLUSIONS

On the basis of the information provided within this letter, and the enclosed documentation, we wish to place on record our **support** for the proposed allocation of Land to the West of Wigginton Road which is currently proposed by CYC as a new Garden Village within the emerging City of York Local Plan.

Whilst we support the principles of the allocation of the site, we believe that amendments are required to the site's proposed boundaries in order to ensure that CYC's Garden Village philosophy for the site can be delivered alongside each of CYC's identified Planning Parameters.

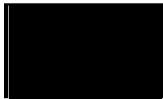
Our proposals have the potential to provide a new Garden Village of either 1,350 homes; 1,725 homes; or 2,200 homes alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities. The site is strategically located to the north of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible.

The development proposals are situated in a **suitable** and highly sustainable location and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. The site is **available** now as it is under the control of a national house builder and regional development company who are actively seeking to secure planning permission for the residential development of the site. The site can also be considered **achievable** as our clients can deliver new homes on the site within the next five years.

Finally, in respect of procedural matters, we would like to work alongside CYC to finalise the site specific strategic development policy to be included within future versions of the Local Plan. Working together we can ensure that CYC's and the local community's planning parameters for the site are deliverable.

Should you require any further details or clarification on the content of this letter please do not hesitate to contact me.

Yours sincerely,



PAUL BUTLER

Director

paul.butler@pbplanning.co.uk

Local Plan,
City of York Council,
West Offices,
Station Rise,
York,
YO1 6GA

4th April 2018

Dear Sir or Madam,

CITY OF YORK LOCAL PLAN – LAND WEST OF WIGGINTON ROAD – BARRATT HOMES & DAVID WILSON HOMES AND TW FIELDS – CLIFTON GATE - SUPPORT FOR SITE REFERENCE ST14

We write on behalf of our clients Barratt Homes & David Wilson Homes (BDW) and TW Fields (TWF) to provide City of York Council (CYC) with their representations to CYC's Publication Draft Local Plan (February 2018).

From a review of the latest version of the Local Plan, it is clear that CYC have not taken on board the evidence we previously presented in our representations to earlier versions of the Local Plan, by letters dated 12th September 2016 and 27th October 2017. As a result, we are concerned that the current Publication Draft Local Plan cannot be considered sound in the context of Paragraph 182 of the NPPF.

This letter does not seek to re-iterate the comments made to CYC in our previously submitted representations. These are enclosed, and we request that they are submitted alongside this letter to the Secretary of State as a holistic and comprehensive representation for the Land to the West of Wigginton Road (Site Ref. ST14), which we refer to as Clifton Gate.

This letter will however provide a summary of the comments previously made, before providing an update in our response to CYC's evidence base in association with the deliverability of this site and the objectively assessed housing needs of the City.

Our client's **support** CYC's identification of the site as a new Garden Village within the emerging City of York Local Plan. However, we wish to make it clear from the outset that we have concerns with the current red line site allocation boundary.

Whilst the site can deliver 1,348 homes within the plan period within CYC's current site red line site allocation boundary, it is our view that the current boundary should be expanded in order to enhance the community and green infrastructure that the site can deliver in respect of the policy aspirations required by Policy SS12 of the Publication Draft Local Plan.

Furthermore, when considering the need to expand the current red line site allocation boundary for the site, CYC must also recognise that the site area we are proposing for our 1,350 development option mirrors that which CYC submitted to the Government as part of their successful Housing Infrastructure Fund bid (subject to submitting a sound business case) in September 2017. Which of course seeks funding to accelerate the delivery of new homes at the site. Consequently, in order for CYC to fulfil the requirements necessary to obtain the funding provisionally allocated, the site allocation boundary needs to be expanded to ensure that the site's area identified within the Housing Infrastructure Fund bid and the Local Plan align.

We therefore request that CYC amend the red line site allocation boundary prior to the submission of the Local Plan to the Secretary of State in order to ensure that the Local Plan can be found sound. From a delivery point of view, this will also allow us to prepare and submit a planning application prior to the adoption of the Local Plan, which could then be determined shortly after the Local Plan's adoption. Thus, ensuring the delivery of new homes from the site at the earliest point possible.

CLIFTON GATE – SUMMARY & DEVELOPMENT OPTIONS

A summary of our previous representations is provided in the table below: -

Site ST14 – Representations Summary
<ul style="list-style-type: none"> • We fully support the principle of the proposed allocation of the site by CYC. • Three deliverable and viable development proposals are being put forward for CYC’s consideration: <ul style="list-style-type: none"> ○ The delivery of 1,350 homes (including 405 affordable homes) at the site alongside each of CYC’s proposed “Planning Principles”. ○ The delivery of 1,725 homes (including 517 affordable homes) at the site to meet any potential increase in the City’s housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site. ○ The delivery of up to 2,200 homes (including 660 affordable homes) at the site to meet any potential increase in the City’s housing requirements or the need to ensure permanence to the City’s Green Belt, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site. • The development proposals can deliver 420 homes within the first 5 years of the Local Plan and up to 1,725 homes (at least) within the plan period. The number of homes to be delivered at the site would be accelerated should CYC’s Housing Infrastructure Fund bid be successful. • The proposals will deliver a Garden Village design philosophy with the provision of substantial community infrastructure including a primary school, village centre, public open space and recreational facilities. • The net developable residential area of each of the proposed options are either smaller or similar in size to the current allocation site area prescribed by CYC. • In each of the development options above, the historic and landscape character of this area of the City will be preserved as key views to York Minster are maintained and strategically placed open space on the site’s boundaries alongside the site’s existing woodland areas will deliver permanent future boundaries to the site. • Separation distances between the site and surrounding areas are substantial. The distance between the site’s western boundary to Skelton is 1km; its eastern boundary to Wigginton Road is 0.6km (both of these separation distances remain for all site options; and its southern boundary to Clifton Moor is between 0.25km and 0.46km (depending on which site option is progressed). • Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south). Appropriate contributions will be delivered for highways upgrades. Land can also be made available for the potential future widening of the A1237. • Pedestrian and cycle connections will be provided throughout the site, with connectivity to existing links and Clifton Moor via a proposed subway under the future upgraded A1237. • The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

The site is strategically located to the north of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services at Clifton Moor. Importantly, there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

Whilst the introduction of this letter focused on the need for CYC to expand the red line site allocation boundary to ensure the delivery of a 1,350 home Garden Village at the site, the site has the potential to provide for a new garden village of either 1,350; 1,725; or up to 2,200 new homes, alongside the

delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities.

The site has been identified as strategic housing site allocation ST14 within iterations of the City of York Local Plan since June 2013. At that time the Preferred Options Local Plan identified the site as having the potential to deliver 4,020 homes, along with the allocation of Safeguarded Land to the north of the allocation. The number of homes to be provided at the site was reduced to 2,800, along with an amendment to the red line site allocation boundary, within the now withdrawn City of York Publication Draft Local Plan (October 2014).

None of the proposed options for Clifton Gate are within the *York Green Belt Appraisal Character Areas* as set out in Figure 3.1 of the council's Publication Draft Local Plan

Prior to the withdrawal of the previous Publication Draft Local Plan, our clients undertook and submitted technical assessments associated with the delivery of the previously proposed red line site allocation boundary. Comprehensive community consultation work with local stakeholders, including a Community Planning Weekend, was also undertaken in respect of the larger site area.

Consequently, as CYC have previously undertaken public consultation and Sustainability Appraisal work in respect of the larger site, there remains the potential for the enlargement of the allocation back to the previously considered acceptable size, should CYC need to do so to meet the City's increased housing needs.

This letter reiterates our client's design philosophy for the proposed development of a 21st Century Garden Village at the Clifton Gate site and demonstrates the site's deliverability for residential development in accordance with national planning guidance. In doing so the letter again refers to the following documents which are enclosed: -

- Visual Document – JTP/Turkington – August 2016
- Illustrative Masterplan – JTP – August 2016
- 1,350 Home Land Use Plan; Land Use Schedule & Key – JTP – August 2016
- 1,725 Home Land Use Plan; Land Use Schedule & Key – JTP – August 2016
- 2,200 Home Land Use Plan; Land Use Schedule & Key – JTP – October 2017
- Archaeology Statement - York Archaeological Trust – August 2016
- Outline Transport Strategy Report – Fore Consulting – September 2016
- Ecology Statement – Baker Consulting – September 2016
- Utilities Statement – Arup – September 2016

The documents referenced above provide an update of the comprehensive technical reports which were previously submitted to CYC in the promotion of the original larger site area proposed for allocation by CYC within the withdrawn City of York Publication Draft Local Plan (October 2014). The parameters established within the comprehensive technical reports were utilised in the preparation of the new indicative masterplans for the site.

With regards to our proposed Option 2, which recommends the delivery of 1,725 homes at the site, in order to meet an evidenced increase to the City's housing requirements, CYC's Officer's endorsed an increase in the proposed site allocation from 55ha (1,348 homes) to 68ha (1,672 homes) to CYC's Local Plan Working Group on the 10th July 2017. The reasoning behind the recommendation was as follows:

“This reflects developers/landowners concerns regarding the viability/deliverability of the site and the ability to deliver the planning principles including the significant infrastructure requirements given the sites location adjacent to the A1237.”

This option was also put forward by CYC's Officer's as a potential change to the Local Plan ahead of consultation in respect of the Publication Draft Local Plan at CYC's Local Plan Working Group on the 23rd January 2018.

Whilst CYC's Officer's recommendations were not approved on either occasion, we believe there is still a strong case for the expansion of the site in respect of both size and housing numbers. Whilst we support CYC's Officer's recommendation, it remains our view that in order to deliver a truly exemplar new Garden Village, the site allocation should be expanded to at least *"72.73Ha in total and 1,725 homes (at 32dph on 53.96ha net residential developable area)"* for the reasons identified within this and our previous representations; the reasoning provided by CYC's Officers; and due to the potential need to deliver additional homes from the site to meet the increased housing needs of the City.

With regard to our proposed Option 3, the 2,200 home opportunity for the development of the site was previously put forward for CYC's consideration on account of the potential need for additional housing numbers as result of the Government's recent announcement associated with a standardised methodology for calculating annual housing requirements; the need for CYC to ensure enduring and permanent Green Belt boundaries beyond the plan period; and as a result of CYC's recent Housing Infrastructure Fund bid to the Government, which could result in an accelerated delivery of new homes at the site.

Notwithstanding the above, we believe that it is of paramount importance that in the first instance CYC ensure that the site allocation red line boundary for their proposed number of homes (1,348) is correct to ensure the delivery of a Garden Village style development alongside the comprehensive delivery of CYC's community and green infrastructure aspirations for the site as required by Policy SS12 of the Publication Draft Local Plan.

As identified above, there are three potential masterplan options associated with the development of the site: -

1. The delivery of 1,350 homes at the site to align with CYC's proposed housing numbers within the Publication Draft Local Plan Document. This masterplan option represents a deliverable and viable opportunity to meet CYC's current proposed housing numbers for the site, whilst also ensuring that each of CYC's proposed "Planning Principles" are delivered.
2. The delivery of 1,725 homes at the site to meet any potential increase in the City's housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC's proposed "Planning Principles" for the site. This option could also deliver an increase in economic and social benefits associated with the delivery of more homes at the site.
3. The delivery of up to 2,200 homes at the site to meet any potential increase in the City's housing requirements or the need to ensure permanence to the City's Green Belt, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC's proposed "Planning Principles" for the site.

The vision of the proposals is to deliver a landscape led development which is separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The proposed development options have been formulated following the undertaking of ecology, landscape, Green Belt, archaeology, drainage, infrastructure and highways assessments. Each of the proposals seek to deliver a Garden Village development, community facilities and substantial areas of recreation and amenity space.

With our previous representations we provided an assessment of each of the development options against each of CYC's policy parameters identified within draft Local Plan Policy SS12. For brevity, we do not seek to repeat this assessment here and again ask that CYC refer to our previous submissions which are enclosed with this letter.

However, in order to reaffirm our point in respect of the need to expand the current proposed red line site allocation boundary, we provide in the table below an analysis of the amount of land that would be available for community and green infrastructure within CYC's current site allocation red line boundary and each of our development options.

Ref.	CYC	Option 1	Option 2	Option 3
Site Size / Capacity	55Ha / 1,348 Homes (1200 plan period)	65.36Ha / 1,348 Homes (All within the plan period)	77.56Ha / 1,725 Homes (All within the plan period)	101.53Ha / 2,200 Homes (Potential for up to 2,200 homes within the plan period)
Density / Design Ethos	Strategic Site – 70% net site area at 35dph	Garden Village – Approximately 60% to 70% net developable area – 42.32Ha net site area at 32dph	Garden Village – Approximately 60% to 70% net developable area - 53.92Ha net site area at 32dph	Garden Village – Approximately 60% to 70% net developable area - 67.92Ha net site area at 32dph
Additional Land Uses / Analysis	<p>A density of 35 dph over the net developable area would result in a development that is similar in density to those currently taking place within the main urban areas of the City i.e. Redrow’s scheme at the Grain Stores; Persimmon’s scheme at Germany Beck and BDW’s scheme at New Lane, Huntington.</p> <p>It does not allow for space/planting between dwellings or further green wedges/planting throughout the street scene. Which is what a Garden Village ethos requires and is more aligned to a density of 32dph and a net developable area of 60% to 70%.</p> <p>At 32 dph over a 60% developable area, 1,056 homes could be delivered. This increases to 1,232 homes over a 70% new developable area.</p> <p>Increasing this to 1348 homes within the current proposed site area would therefore result in a reduction of the land available for the delivery of all of the other essential and desirable uses such as a new primary school, local centre, recreational open space and SuDS features.</p>	<p>The option can deliver: -</p> <ul style="list-style-type: none"> • 1,348 homes at 32dph • 2.3Ha of land for a Local Centre. • 2.26Ha of land provided for Nursery and a two-form entry Primary Education. • 16.52Ha of Open Space within the site and substantial areas of green space on the site’s western boundary. Distance from the site’s western boundary to Skelton is 1km. 	<p>The option can deliver: -</p> <ul style="list-style-type: none"> • 1,725 homes at 32dph • 2.3Ha of land for a Local Centre • 2.26Ha of land provided for Nursery and a two-form entry Primary Education. • 17.12Ha of Open Space within the site and substantial areas of green space on the site’s western boundary. Distance from the site’s western boundary to Skelton is 1km. 	<p>The option can deliver: -</p> <ul style="list-style-type: none"> • 2,200 homes at 32dph • 2.3Ha of land for a Local Centre • 2.26Ha of land provided for Nursery and a two-form entry Primary Education. • Substantially increased areas 27.09Ha of Open Space within the site and substantial areas of green space on the site’s western boundary. Distance from the site’s western boundary to Skelton is 1km. Additional open space is also to be provided to the site’s northern edge in order to provide a robust green wedge between the site and Moor Lane. It is envisaged that the open space in this location will be in the form of new accessible areas of woodland planting and also land available for the expansion of the existing cemetery.

The similarities between each of BDW & TWF's development options are clear. Whilst they all represent deliverable and viable development opportunities to deliver a significant proportion of the City's housing needs, the difference between the three options is associated with the increase in proposed residential dwellings and, of course, the proportionate economic and social benefits associated with the delivery of more homes from the site.

The three proposed development options at the site can deliver the following economic and social benefits to the City of York: -

Socio-Economic Benefit	Option 1 1,350 Homes	Option 2 1,725 Homes	Option 3 2,200 Homes
Creating sustainable communities through meeting market and affordable housing needs, offering existing and potential residents of the City the opportunity to live in the type of house and location they desire	Including up to 405 Affordable Homes	Including up to 518 Affordable Homes	Including up to 660 Affordable Homes
Delivering significant financial contributions towards the improvement of the City's infrastructure including the provision of S106/CIL payments and land for the potential widening of the A1237 ring road in the future.	S106/CIL payments will increase proportionately for each Option		
New capital construction expenditure from private funding	£163m	£208m	£268m
Creation of substantial direct and indirect employment opportunities, including apprenticeships, of which 70% are usually retained in the local area.	361 Jobs	461 Jobs	579 Jobs
Sustaining and improving the District's labour market through delivering the right homes in the right locations.	Benefit will increase proportionately for each Option		
Increased retail and leisure expenditure in the local area per annum	£32m	£41m	£51m
Creation of additional jobs within the local retail and leisure sector	196 Jobs	250 Jobs	299 Jobs
Provision of funding towards public services from the Government's new homes bonuses	£12.4m	£15.8m	£19.2m
Provision of funding towards public services from annual Council tax payments	£2.07m	£2.6m	£3.2m
Provision of services including superfast broadband			

It is clear that all three of our proposed new Garden Village options for the Clifton Gate site can deliver substantial economic, social and environmental benefits to the local area and wider City.

The National Planning Policy Framework seeks to encourage sustainable growth and identifies in Paragraph 8 that economic growth, such as that which this site can deliver, can secure higher social and environmental standards. Furthermore, Paragraph 52 identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements that follow the principles of Garden Cities (or a Garden Village in this case).

A NEW 21ST CENTURY YORKSHIRE GARDEN VILLAGE – PRESERVING THE CHARACTER AND SETTING OF YORK

We believe it is important to again present to CYC the vision of our development proposals, as these are a key justification for the Council to expand the red line site allocation boundary.

A Vision Document, prepared jointly by JTP Architects and Turkington Martin Landscape Architects, is submitted alongside these representations. The document identifies the vision to deliver: -

A new village with its own identity and good local facilities to meet the everyday needs of residents as the community grows over time. A new village which is well-connected to the centre of York and surrounding settlements by sustainable modes of transport but clearly separated and screened from existing settlements to avoid coalescence. A place that feels a part of York but is still a separate place.

The vision for the site's development, as set out within the development masterplans which are enclosed within the document, has been prepared following a comprehensive assessment of the landscape character of the site and the surrounding areas.

One of the key characteristics of York is how the city developed out from its historic core in the form of radial corridors separated by a series of green fingers. The proposed site aligns with one of these development corridors which extends radially outwards north-west of York City Centre. The proposed development sits between two green fingers, consisting of the Ouse Corridor to the west of the site, and Bootham Stray to the east. These green fingers positively contribute towards York's green infrastructure network, enhancing the amenity and biodiversity value of existing routes into the city centre and links nature conservation sites with other open space. They also preserve the notion of approaching the city through the countryside.

The Outer Ring Road currently demarcates the urban area of York from the surrounding Green Belt countryside. Where settlements are close to this road, there is a separation distance ranging between 60m and 400m. This has the appearance of reinforcing the village character which is distinct from suburban York. This can be seen in the relationship of villages such as Poppleton, Earswick and Haxby with the ring road and the city beyond. The proposal to set the new development back a distance between 250m and 460m from the outer Ring Road as proposed would establish a village character, provide a distinct identity of the development, and reinforce the separation from the edge of York.

In all three of the proposed development options, the built edge of the new village will be 1 kilometre from Skelton and will also be well screened from the east by existing mature woodland and set away from Wigginton Road; preserving the rural character of the route into the city centre.

Screening is provided by existing plantations to the east and mature hedgerows adjacent to Bur Tree Dam to the west, with proposed planting further restricting views into the site. The extent of screening landscape elements will result in distant glimpsed views into the new village centre from Wigginton Road, minimising visual impact on adjacent green corridors.

Existing fragmented woodland will be linked and strengthened with new tree planting, green spaces and sports pitches. A series of linked green spaces will encircle the village, providing recreation for the new community and ensuring a green buffer from Clifton Moor and a low density edge from the surrounding countryside. Sport pitches and school playing fields will be located on the site's western boundary, to deliver active uses adjacent to the wider open countryside.

A new village centre with a cluster of local facilities around an attractive village square with a pond will provide a focus for the new village. The square will accommodate seasonal markets and events. There will also be a new pedestrian/cycle subway link to Clifton Moor shopping centre. Small scale workshops, a health centre and older people's housing is also proposed.

Existing water features including ponds and streams will be incorporated into the new village layout. New water features relating to the Suds systems will also be added. These features will together form an integral aspect of the new streets and open spaces adding character and drawing on precedents from surrounding villages.

Linear green spaces will run through the residential area and incorporate watercourses and existing hedgerows. These linking green spaces will create a network of pedestrian routes through the site and define individual neighbourhoods within the new development. They will accommodate a range of community and recreational facilities such as play areas and allotments. Importantly, the green corridors which run through the site have been positioned in order to preserve views of York Minster.

With regard to the proposed Option 3, additional open space is also to be provided to the site's northern edge in order to provide a robust green wedge between the site and Moor Lane. It is envisaged that the

open space in this location will be in the form of new accessible areas of woodland planting and also land available for the expansion of the existing cemetery.

The developers of the site will also seek to work alongside *Treemendous York* to aid their objective of planting 50,000 new trees within the City in order to promote a healthier, greener, more environmentally friendly, successful and beautiful city.

The development proposals can deliver an exemplary new Garden Village which respects the historic character of the City. It can deliver new homes alongside significant areas of community and green infrastructure, in a sustainable location within proximity of the City's existing urban edge. It will be separated and screened from existing settlements to avoid coalescence, but though a separate place, it will still very much feel a part of York.

MEETING THE CITY OF YORK'S FUTURE HOUSING NEEDS

We maintain our view that there is a case for the identification of additional housing allocations to those currently proposed by CYC in order to meet the City's housing needs over the proposed plan period.

BDW have previously instructed Barton Willmore to undertake a Technical Review of the Council's SHMA and the SHMA addendum, which was prepared by GL Hearn in June 2016, to assess the Council's methodology that has been utilised in formulating the objectively assessed need (OAN).

At present the Council have maintained their decision to progress with a housing target which is based solely on the baseline figure which is derived from the ONS 2014-based sub-national household projections and does not include the 10% uplift for market signals which is advised within the Council's latest SHMA.

By omitting the 10% uplift, and not progressing with a housing requirement of 954 dwellings per annum, the Council are failing to meet their full OAN, as required by the Framework and the Planning Practice Guidance (PPG). There are considered to be no overarching constraints within the District that justify the Council not delivering their full OAN. Such an approach therefore fails to meet any of the tests of soundness set out in paragraph 182 of the NPPF as the Local Plan is not positively prepared; justified; effective and consistent with national policy.

No new evidence has been provided by the Council to justify the removal of the SHMA's proposed 10% uplift for market signals and it is assumed that this has been viewed as a way of reducing the overall housing target. This is unacceptable and is not a sound and robust means of preparing a Local Plan.

The Government's consultation document "*Planning for the Right Homes in the Right Places*" (September 2017) identified a proposed standardised methodology for the calculation of the baseline OAN for each of the Country's Local Authority areas. The Government's proposed standardised methodology includes for an uplift for market signals over and above the baseline figure and in the specific case of York, would lead to a housing requirement of 1,070 dwellings per annum.

Since the commencement of CYC's consultation on the Publication Draft Local Plan, the Government have published further consultation documents associated with a Revised National Planning Policy Framework and Draft National Planning Practice Guidance in March 2018.

The Draft National Planning Practice Guidance (Draft NPPG) provides further guidance in respect of the calculation of an LPA's OAN. The document maintains the proposed standardised methodology for the calculation of OAN, using household projections as the baseline and an uplift for market signals. However, it also identifies the following other key considerations: -

- Plan-making authorities should not apply constraints to the overall assessment of need. Limitations including supply of land, capacity of housing markets, viability, infrastructure, Green

Belt or environmental designations, are considerations when assessing how to meet need. These types of considerations are not relevant to assessing the scale of that need.

- 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). **We would consider the impact of anticipated growth through an Enterprise Zone (York Central, which is also an identified Housing Zone) to be included as an appropriate circumstance to increase housing growth as well. CYC have also submitted two Housing Infrastructure Fund bids to Government as well. One at York Central and one at the Clifton Gate site to which these representations relate (discussed further below).**
- The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow. The total affordable housing need can 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 strategic plan may need to be considered where it could help deliver the required number of affordable homes. **Given York's affordable housing needs, we consider that compelling evidence is available to justify an uplift in the OAN on in order to meet such housing needs.**

Although the Revised NPPF and Draft NPPG are still subject to consultation, they provide a further indication as to how the Government considers housing requirements should be calculated, and the consideration of market signals, strategic growth (employment & housing) and affordable housing as key issues to be considered. Which align closely with the current provisions of the NPPF. Put simply, the guidance provided in the bullet points above cannot be ignored.

Barton Willmore's own Technical Review of the Council's SHMA as part of their "Open House" OAN model work, concluded that when a Market Signals Uplift is included, the full objectively assessed need is considered to range between 920 dwellings per annum and 1,070 dwellings per annum. The higher end of Barton Willmore's threshold therefore directly aligns with the figure that is generated when utilising the Government's standardised OAN methodology (without the consideration of any uplift for strategic growth or affordable housing).

The Council are now in a position where their own evidence; Barton Willmore's Open House work; and the Government's proposed standardised methodology, all state that an uplift for market signals should be added to the baseline figure, and all of which indicate that the true full OAN is greater than the 867 dwellings per annum which is being proposed.

Therefore, in order to make the plan sound, the housing figure should be adjusted upwards to consider market signals, strategic growth and affordable housing needs. This in turn will require additional sites to be allocated for residential development.

Our clients have also previously identified concerns with the approach taken by CYC with regard to the delivery of windfall development throughout the plan period. Such a reliance on unplanned development is contrary to the legislative provision of a plan-led system and should not form the basis of the CYC

Local Plan moving forwards. Such an approach will not direct homes to those areas that have seen limited growth over recent years and have a clear need for new homes in the future. It is also highly likely that no affordable housing will be provided on windfall sites located in the Urban Area on account of the 15-dwelling threshold proposed in draft Policy H10.

Finally, there are also concerns associated with the deliverability of the York Central and Barrack sites.

In respect of York Central this relates to uncertainties over the timescales associated with the site's initial infrastructure works and the final quantum of new homes that can be delivered at the site. We have raised a number of concerns over the ability of the York Central site to deliver the proposed number of homes within the plan period at every stage of consultation on the Local Plan. However, notwithstanding these comments, the number of homes anticipated to be delivered at the site has been increased to between 1,700 and 2,500, with a minimum of 1,500 homes within the plan period. The provision of a range of housing numbers is evidence to justify our case of the uncertainties associated with the development of the site. Furthermore, there is no justifiable evidence to back up these figures. Further evidence in respect of our client's concerns associated with the delivery of the York Central site are provided in the overarching representations prepared by Barton Willmore.

With regard to the Barrack sites, the concerns relate to **when** and **if** both of the sites will become available for development within the plan period. At present no concrete evidence has been provided by the Ministry of Defence that these sites are indeed no longer needed.

Unless these current uncertainties are resolved, it is our view that the quantum of new homes to be delivered at these sites should be considered over and above the identification of housing allocations to meet the City's housing needs. If not, there is a real possibility that that the City could fail to demonstrate the delivery of a sufficient number of deliverable housing sites to meet the City's housing requirement.

Finally, the Publication Draft Local Plan is again relatively silent in respect of the provision of Safeguarded Land and the role this plays in ensuring long term permanence to the Green Belt. Paragraph 85 of the Framework identifies that where necessary LPA's need to plan for longer term development needs "*stretching well beyond the plan period*" through the designation of Safeguarded Land. There are varying examples within recently approved Development Plan documents of what a timescale of "*well beyond the plan period*" can equate to which differ between an additional 10% of land allocations; an additional 5 years' worth of land; or in some cases 10 years' worth of land. It could be argued the greater amount of safeguarded land identified, the greater permanence can be provided to the Green Belt.

In respect of the Clifton Gate site, we support the Council's approach that the larger strategic site allocations will contribute to delivering long term Green Belt permanence where they will deliver homes beyond the initial plan period. An increase of the Clifton Gate site to 2,200 new homes in size as proposed within these and previous representations would make an additional valuable contribution towards providing enduring Green Belt boundaries for the City well beyond the plan period.

In conclusion, when each of the above points are considered holistically, there is a compelling case for the release of additional land as housing allocations within the emerging CYC Local Plan in order to meet the City's full objectively assessed housing needs, such as an extension of our client's Clifton Gate site to deliver at least 1,725 homes.

Notwithstanding the above, in the first instance CYC ensure that the site allocation red line boundary for their proposed number of homes (1,348) at the Clifton Gate site is correct to ensure the comprehensive delivery of the Council's community and green infrastructure aspirations for the site as required by Policy SS12 of the Publication Draft Local Plan.

HOUSING INFRASTRUCTURE FUND BID – SEPTEMBER 2017

As identified above, CYC recently submitted a Housing Infrastructure Fund (HIF) bid to the Government with the aim of accelerating the delivery of new homes from the Clifton Gate site within the plan period.

The Council's bid requested £9.845m funding towards the provision of the site's initial highways infrastructure in order to accelerate the delivery of homes at the site, providing an **additional 280 homes** on site by 2022/2023 and the delivery of all 1,350 homes by 2028/2029.

For the avoidance of any doubt the funding would deliver an additional 280 homes above the anticipated 420 homes which we proposed to deliver within 5 years of the adoption of the Local Plan. Please refer to the previously submitted representations for a full breakdown of the site's delivery timescales.

The HIF funding would enable the delivery of both of the two proposed access points for the site at commencement of development, meaning that the site's delivery will be developed by four separate house builder outlets immediately. Without the requested funding from the HIF only one access point would be delivered on account of cash flow/return on capital expenditure matters, resulting in the commencement of development from two house builder outlets for the first few years.

At present it is anticipated that the development will deliver a yield of at least 120 homes per annum with the potential to deliver up to 150 homes per annum. However, should CYC's HIF bid be successful, this could potentially deliver up to 200 homes in the early stages of the development on account of latent demand and four house builders developing from the site immediately.

The proposed community infrastructure and areas of public open space will be delivered commensurate with the progression of the development and made available for use as required. Meaning the accelerated housing delivery would also deliver the development's community infrastructure (Primary Schools, Village Centre, Health Centre, Elderly Care Homes) much quicker as well.

On account of the substantial initial site infrastructure requirements and costs, the delivery of new homes from the site will not reach its maximum potential for a 2 to 3-year period. Accordingly, the requested funding will enable the acceleration of housing delivery within the first year of the receipt of planning permission.

Should the Council's HIF bid be successful our client's Development Options 2 & 3 would clearly become fully deliverable within the proposed plan period. Which along with the evidence provided above in respect of housing needs and safeguarded land, provides a further planning argument associated with the allocation of our client's larger development options for the site.

Importantly, CYC's HIF bid is based on BDW's and TWF's proposed red line site allocation boundary for 1,350 homes (our Option 1). Therefore, as it stands, the Council's HIF bid and the Local Plan don't align.

CYC were informed by letter dated 20th March 2018 of the Government's decision to progress with the Clifton Gate bid to the co-development stage of the competitive HIF process. As part of this process we will work alongside CYC to present a business case for the funding, which will in due course be assessed by the Government prior to a final funding decision being made.

Consequently, in order for CYC to increase the chances of obtaining the funding requested in the HIF bid, the site allocation red line boundary needs to be expanded to ensure that the site's area identified within the HIF bid and the Local Plan align.

As stated above, not only will the HIF bid funding accelerate the delivery of new homes at the site, but it will also accelerate the delivery of the proposed community and green infrastructure at the site as well. Thus, enhancing the sustainability of the proposed new Garden Village as early as possible in the plan period.

MECHANISM TO AMEND THE SITE ALLOCATION BOUNDARY

There is a legal process which CYC can undertake in order to amend the red line site allocation boundary ahead of the submission of the Local Plan to the Secretary of State.

The process includes the following steps: -

- Amend the Local Plan's Proposal Maps;
- Update the Local Plan's Sustainability Appraisal;
- Update Local Plan Policy SS12 (with regards to the number of homes to be delivered from the site within the Local Plan period); &
- Reference the amendments to the Proposal Maps and Policy SS12 within a Modifications Document to be submitted to the Secretary of State along with the Local Plan.

In order for the Local Plan to meet its legal obligations, it is necessary for the Sustainability Appraisal to be up to date in respect of the final, submitted, red line site allocation boundary for the site and the quantum of development proposed.

Consequently, should CYC update the current Sustainability Appraisal in accordance with the red line site allocation boundary proposed within our representations for the 1,350 homes option, and include reference to the quantum of development identified in the table above on Page 5 of these representations, then CYC would be legally allowed to amend the red line site allocation boundary prior to the submission of the Local Plan to the Secretary of State.

As adequate consultation has already taken place on a variety of development options for the site previously, including a much larger site area, the Local Plan would be considered sound with regards to the obligations of national planning policy and guidance.

We urge CYC to undertake the tasks identified above to ensure that the Local Plan can be found sound on the submission of the Local Plan to the Secretary of State in respect of Local Plan Policy SS12.

CONCLUSIONS

On the basis of the information provided within this letter, and the enclosed documentation, we wish to place on record our **support** for the proposed allocation of Land to the West of Wigginton Road which is currently proposed by CYC as a new Garden Village within the emerging City of York Local Plan.

Whilst we want to work alongside CYC to ensure the delivery of a sound Local Plan for the City, we are concerned that unless changes are made to the Publication Draft Local Plan prior to its submission to the Secretary of State, it will not be in a position where it can be found sound. With regards to the Clifton Gate site, this relates to the proposed site allocation boundary.

Whilst we support the principles of the allocation of the site, we believe that amendments are required to the site's proposed boundaries in order to ensure that CYC's Garden Village philosophy for the site can be delivered alongside each of CYC's identified Planning Parameters.

Whilst the delivery of 1,348 homes at the site within the plan period can be considered sound in respect of Paragraph 182 of the NPPF. We believe that Policy SS12 of the Local Plan would be considered more robust and sound if the red line site allocation boundary is amended to mirror that which we propose in our client's 1,350 home option.

The requested amendment to the proposed red line site allocation boundary will also substantially enhance the prospect of CYC being successful in their HIF bid for the Clifton Gate site, as CYC's HIF bid is based on BDW's and TWF's proposed site allocation red line boundary for 1,350 homes (our Option 1).

Furthermore, these representations have also presented a compelling case for the release of additional land as housing allocations within the emerging CYC Local Plan in order to meet the City's full objectively assessed housing needs.

Consequently, we have presented three potential development options to the Council to provide a new Garden Village of either 1,350 homes; 1,725 homes; or 2,200 homes alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities. There is also an argument to suggest that a development of up to 2,800 homes could be provided at the site, which of course was a previous option put forward by CYC in the withdrawn Publication Draft Local Plan (October 2014).

The site is strategically located to the north of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible.

The development proposals are situated in a **suitable** and highly sustainable location and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. The site is **available** now as it is under the control of a national house builder and regional development company who are actively seeking to secure planning permission for the residential development of the site. The site can also be considered **achievable** as our clients can deliver new homes on the site within the next five years.

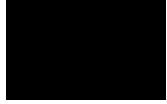
In light of the guidance provided in Paragraph 182 of the NPPF, we consider the following: -

- The Local Plan is **positively prepared** in respect of the delivery of 1,348 homes at the Clifton Gate site as the delivery of homes from the site will contribute significantly to meeting the evidenced objectively assessed development and infrastructure requirements of the City.
- The Local Plan is **justified** in respect of the Clifton Gate site as compelling evidence has been provided in this and previously submitted representations to demonstrate that the site's allocation is the most appropriate strategy for delivering a sustainable Garden Village of 1,348 homes in this location of the City, when considered against the reasonable alternatives, based on proportionate evidence;
- The Local Plan is **effective** as the proposed housing numbers at the Clifton Gate site are entirely deliverable within the plan period; &
- The Local Plan is **consistent with national policy** in respect of the Clifton Gate site as compelling evidence has been provided to demonstrate that the proposed development will deliver sustainable development within the plan period. Particular in respect of Paragraph 52 of the NPPF which identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements that follow the principles of Garden Cities (or a Garden Village in this case).

Finally, in respect of procedural matters, we would like to work alongside CYC to finalise the site specific strategic development policy to be included within future versions of the Local Plan. Working together we can ensure that CYC's and the local community's planning parameters for the site are deliverable.

Should you require any further details or clarification on the content of this letter please do not hesitate to contact me.

Yours sincerely,



PAUL BUTLER

Director

paul.butler@pbplanning.co.uk



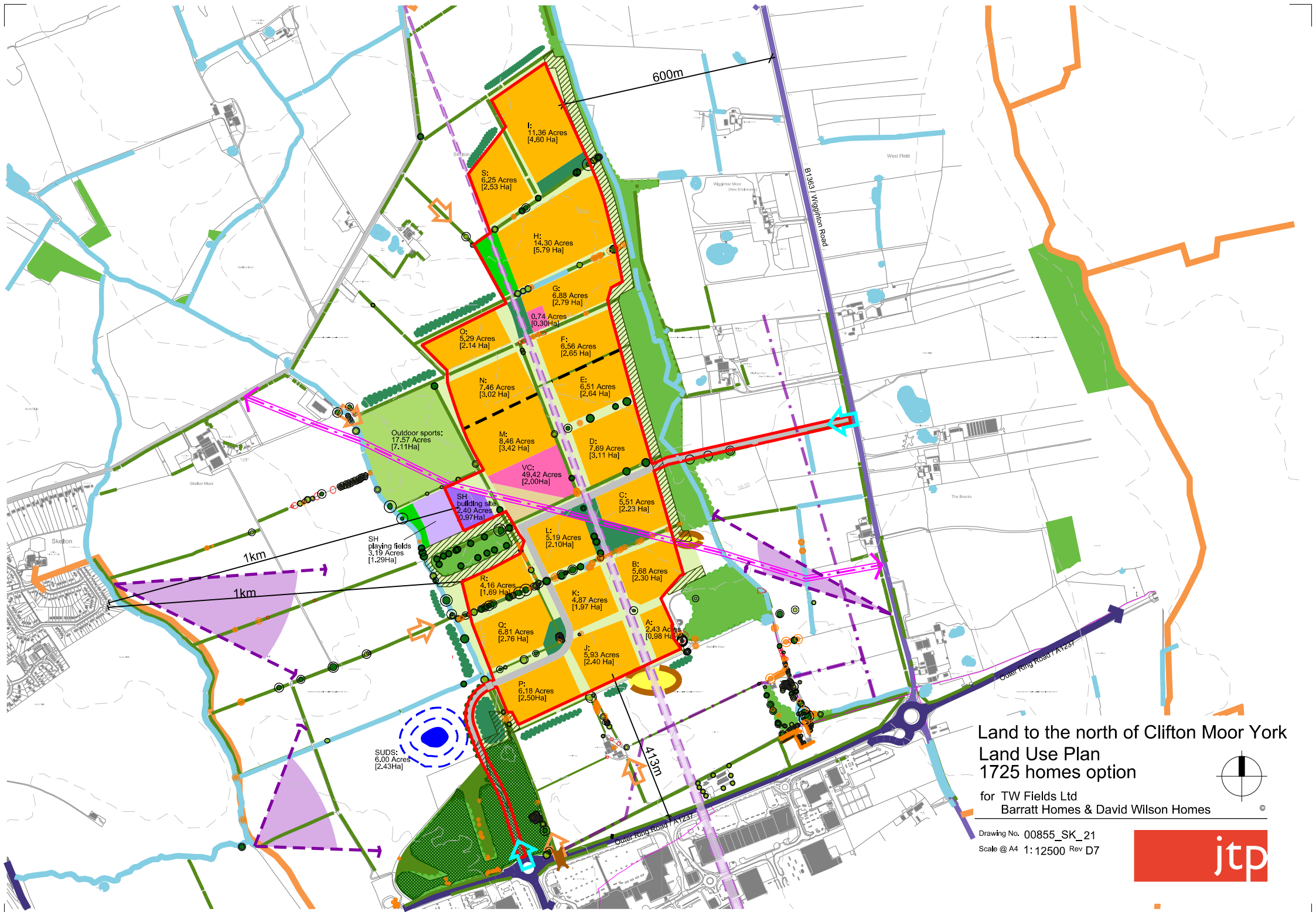
- Key
- ① Village square
 - ② Primary school
 - ③ Cricket green and pavilion
 - ④ Football pitches
 - ⑤ Attenuation ponds
 - ⑥ Allotments
 - ⑦ Play area
 - ⑧ Foot and cycle bridge

Land to the north of Clifton Moor York
 Illustrative Master Plan
 for TW Fields Ltd
 Barratt Homes & David Wilson Home

Drawing No. 00855_SK_22
 Scale @ A2 1:10000 Rev D1







Land to the north of Clifton Moor York
 Land Use Plan
 1725 homes option

























for TW Fields Ltd
 Barratt Homes & David Wilson Homes

Drawing No. 00855_SK_21
 Scale @ A4 1:12500 Rev D7



KEYS

Constraints

-  Site boundary
-  Contour lines
-  Existing streams or ponds
-  Existing woodlands surrounding the site (outline representing canopy)
-  Existing woodlands within the site (outline representing canopy)
-  Designated woodlands - SINC (Site of Importance for Nature Conservation)
-  30m buffer to historic woodlands
-  Existing Category A trees To be Retained (RPA shown with a circle)
-  Existing Category B trees May or May not be Retained (RPA shown with a circle)
-  Existing Category C trees May or may not be retained- TBC (RPA shown with a circle)
-  Existing dead/dying trees To be removed
-  Existing hedgerows Could be removed - TBC
-  Existing important hedgerow corridors (8m) To be retained
-  Areas of potential archaeological interest
-  Emergency Water main with 7.5 m wide easement on each side
-  Overhead electric services
-  Existing buildings
-  Existing A roads (Key vehicular routes)
-  Existing B roads
-  Other important vehicular routes
-  Potential vehicular access into site
-  Potential pedestrain access into site
-  Existing PROWs (Public Rights of Way) and bridleways
-  Existing Key view corridors

Land use

-  Residential
-  Primary school-building site
-  Primary school-playing fields
-  Mixed-use
-  Open space with play areas
-  Outdoor Sports
-  Allotments
-  Other green/open space
-  Primary vehicular route
-  Proposed structural woodland
-  Proposed cycle and footbridge [Indictive location]
-  Indictive SUDS location
-  Proposed trees [Indictive]

Land to the north of Clifton Moor York Land Use Plan

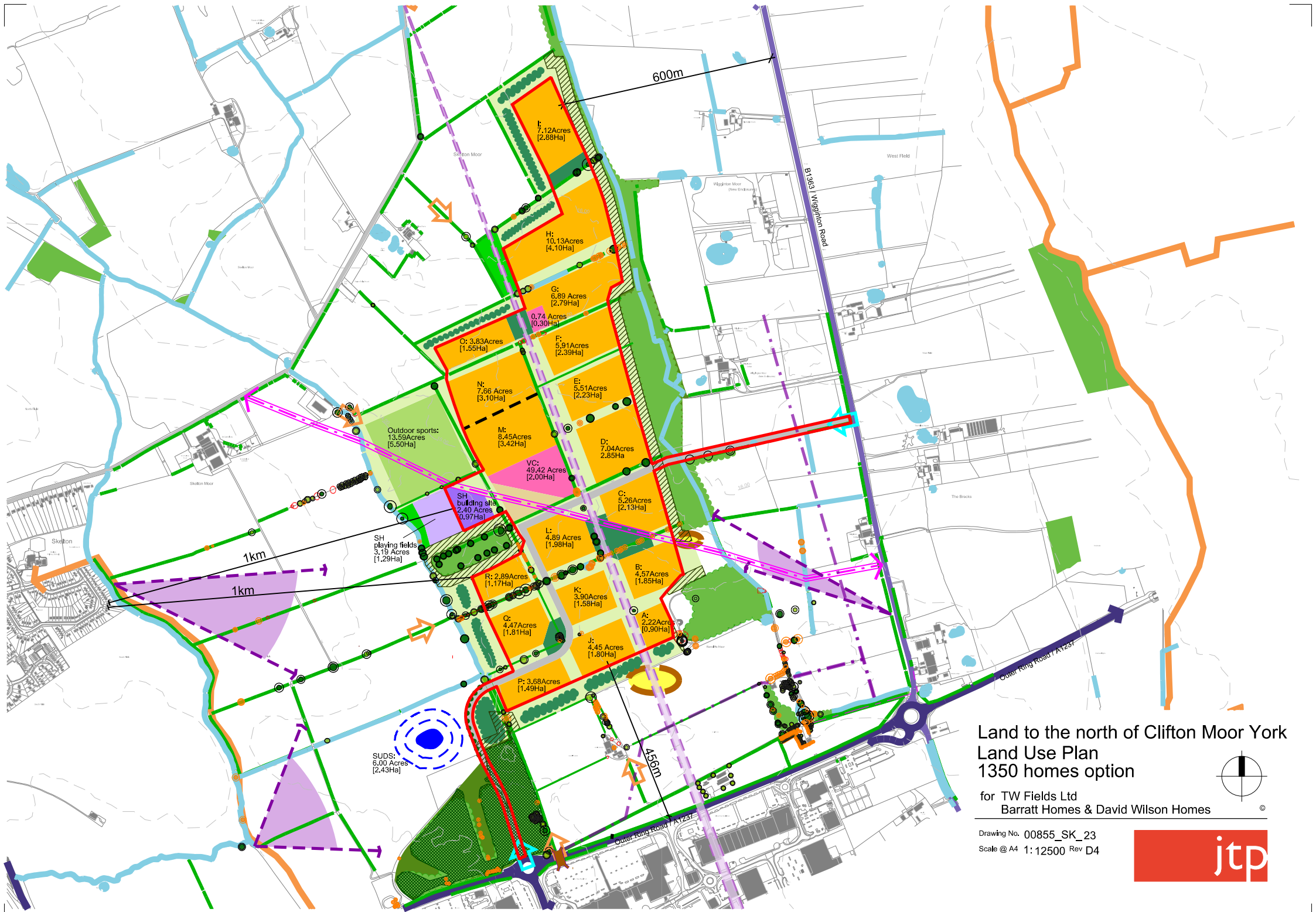
Keys

for TW Fields Ltd
Barratt Homes & David Wilson Homes



Drawing No. 00855_SK_
Scale @ A4 Rev -





Land to the north of Clifton Moor York
 Land Use Plan
 1350 homes option

for TW Fields Ltd
 Barratt Homes & David Wilson Homes



























Drawing No. 00855_SK_23
 Scale @ A4 1:12500 Rev D4



KEYS

Constraints

-  Site boundary
-  Contour lines
-  Existing streams or ponds
-  Existing woodlands surrounding the site (outline representing canopy)
-  Existing woodlands within the site (outline representing canopy)
-  Designated woodlands - SINC (Site of Importance for Nature Conservation)
-  30m buffer to historic woodlands
-  Existing Category A trees To be Retained (RPA shown with a circle)
-  Existing Category B trees May or May not be Retained (RPA shown with a circle)
-  Existing Category C trees May or may not be retained- TBC (RPA shown with a circle)
-  Existing dead/dying trees To be removed
-  Existing hedgerows Could be removed - TBC
-  Existing important hedgerow corridors (8m) To be retained
-  Areas of potential archaeological interest
-  Emergency Water main with 7.5 m wide easement on each side
-  Overhead electric services
-  Existing buildings
-  Existing A roads (Key vehicular routes)
-  Existing B roads
-  Other important vehicular routes
-  Potential vehicular access into site
-  Potential pedestrain access into site
-  Existing PROWs (Public Rights of Way) and bridleways
-  Existing Key view corridors

Land use

-  Residential
-  Primary school-building site
-  Primary school-playing fields
-  Mixed-use
-  Open space with play areas
-  Outdoor Sports
-  Allotments
-  Other green/open space
-  Primary vehicular route
-  Proposed structural woodland
-  Proposed cycle and footbridge [Indictive location]
-  Indictive SUDS location
-  Proposed trees [Indictive]

Land to the north of Clifton Moor York Land Use Plan

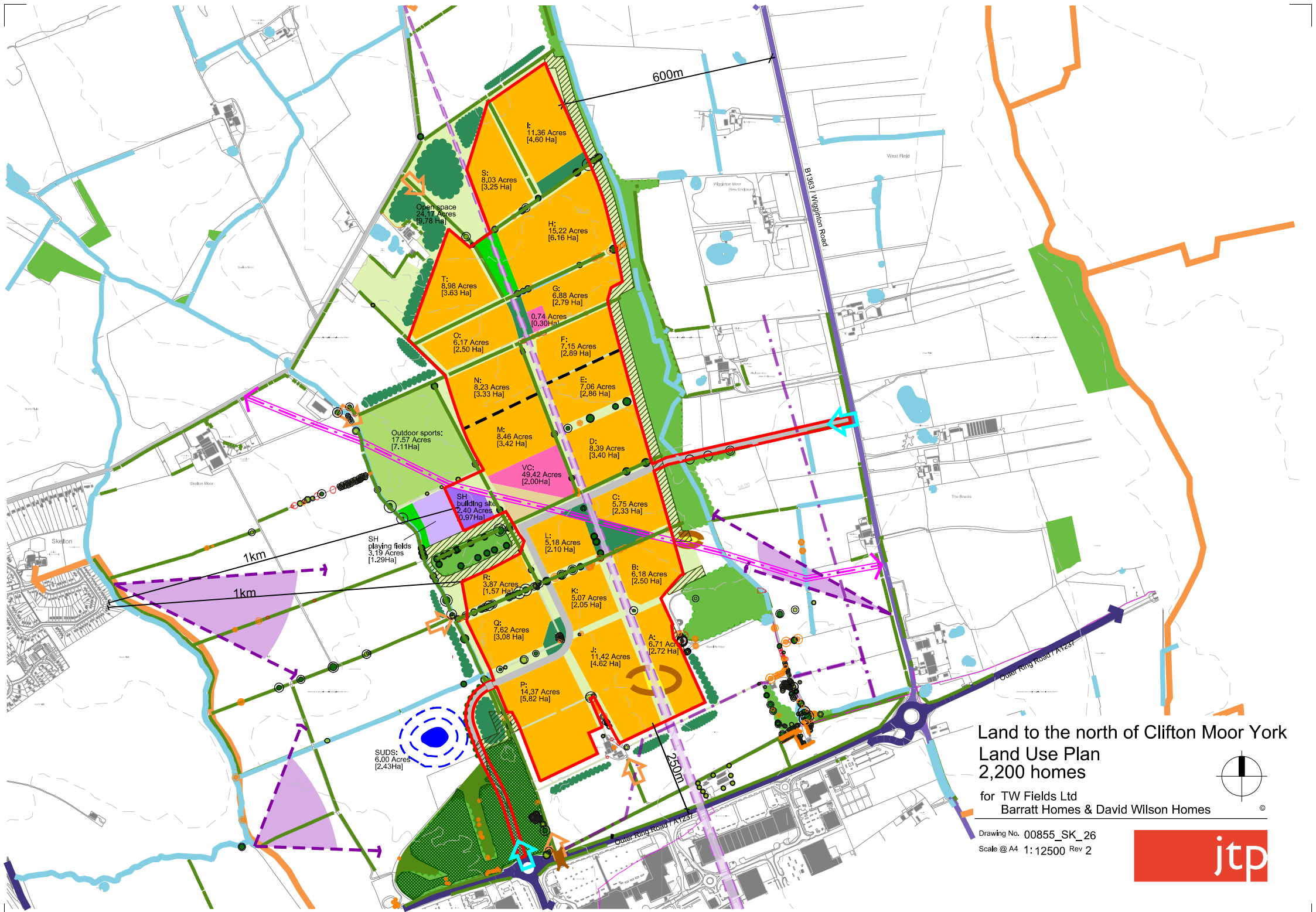
Keys

for TW Fields Ltd
Barratt Homes & David Wilson Homes



Drawing No. 00855_SK_
Scale @ A4 Rev -





Land to the north of Clifton Moor York
 Land Use Plan
 2,200 homes

























for TW Fields Ltd
 Barratt Homes & David Wilson Homes

Drawing No. 00855_SK_26
 Scale @ A4 1:12500 Rev 2



KEYS

Constraints

-  Site boundary
-  Contour lines
-  Existing streams or ponds
-  Existing woodlands surrounding the site (outline representing canopy)
-  Existing woodlands within the site (outline representing canopy)
-  Designated woodlands - SINC (Site of Importance for Nature Conservation)
-  30m buffer to historic woodlands
-  Existing Category A trees To be Retained (RPA shown with a circle)
-  Existing Category B trees May or May not be Retained (RPA shown with a circle)
-  Existing Category C trees May or may not be retained- TBC (RPA shown with a circle)
-  Existing dead/dying trees To be removed
-  Existing hedgerows Could be removed - TBC
-  Existing important hedgerow corridors (8m) To be retained
-  Areas of potential archaeological interest
-  Emergency Water main with 7.5 m wide easement on each side
-  Overhead electric services
-  Existing buildings
-  Existing A roads (Key vehicular routes)
-  Existing B roads
-  Other important vehicular routes
-  Potential vehicular access into site
-  Potential pedestrain access into site
-  Existing PROWs (Public Rights of Way) and bridleways
-  Existing Key view corridors

Land use

-  Residential
-  Primary school-building site
-  Primary school-playing fields
-  Mixed-use
-  Open space with play areas
-  Outdoor Sports
-  Allotments
-  Other green/open space
-  Primary vehicular route
-  Proposed structural woodland
-  Proposed cycle and footbridge [Indictive location]
-  Indictive SUDS location
-  Proposed trees [Indictive]

Land to the north of Clifton Moor York Land Use Plan

Keys

for TW Fields Ltd
Barratt Homes & David Wilson Homes



Drawing No. 00855_SK_
Scale @ A4 Rev -

