

From: Jennifer Longstaff [jennifer.longstaff@savills.com]
Sent: 04 April 2018 12:14
To: localplan@york.gov.uk
Subject: Local Plan - Publication Draft Local Plan (February 2018) - York Diocesan Board of Finance Limited and The York and Ainsty Hunt - Joint Submission
Attachments: Appendix 1.pdf; Appendix 2.pdf; Appendix 3..pdf; Public reports pack 25th-Jan-2018 17.30 Executive compressed.pdf; YDBF_YAH_PolicySS1.pdf; YDBF_YAH_PolicySS2.pdf; YDBF_YAH_PolicyH1.pdf

Dear Sirs,

We write to you on behalf of our clients, the York Diocesan Board of Finance Limited and The York and Ainsty Hunt – a Joint Submission - in response to the Publication Draft Regulation 19 Consultation.

Our clients would like to work closely and in partnership with the Council to support and help deliver sustainable development in York. We would be pleased if the attached comments are taken into account during the preparation of the Local Plan and we would ask that we are kept informed of all future consultations during the Plan process.

In the meantime, we would be most grateful if you could acknowledge receipt of this email and its attachments and, if you have any queries with regard to this submission, please do not hesitate to contact me.

Kind regards

Jennifer Longstaff BA (Hons), MSc, MRTPI
Associate Director
Rural, Energy & Projects - Head of Planning (Darlington)

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Ref: A088531/ NRB

Date: 14th July 2014

Mr R Murphy

Smiths Gore

26 Coniscliffe Road

Darlington

DL3 7JX

Dear Robert

Land South of Foxwood Lane, Acomb, York - Access Appraisal

Further to your instructions of last week I write with my views on the potential to access the land identified in the City of York Local Development Framework Submission Draft Core Strategy for Residential Development as Site 792, located to the south of Foxwood Lane, and Figure 1 attached shows the location of the site. I understand the site can accommodate around 120 homes.

Local Transportation Networks

The development site is agricultural land and is bounded to the north by Foxwood Lane, to the east and south by agricultural fields and to the west by Askham Lane. Foxwood Lane runs in a general west to east direction from its roundabout junction with Askham Lane to its roundabout junction with Thanet Road. From Thanet Road, Tadcaster Road provides a direct route to York City Centre. In the vicinity of the site, Foxwood Lane has a carriageway width of some 7.5m with footway along the development site frontage running for the full extent of the route and footway along the north side of Foxwood Lane between Forester's Walk and Thanet Road. There are no waiting restrictions on Foxwood Lane but traffic calming features are present in the form of speed cushions. Foxwood Lane is subject to a 30mph speed limit.

Askham Lane runs from the A1237 York Bypass to Front Street and Gale Street. Askham Lane is approximately 6.9m wide in the vicinity of the development site. To the north of the Foxwood Lane junction Askham Road is developed on the east side with footways on both sides of the road, traffic calming and a 30mph speed limit. To the south of Foxwood Road it is undeveloped, without footways and has a 40mph speed limit.

Askham Lane provides a direct route for residents of Acomb and Foxwood to the A1237 York Bypass for connections northwards to north York, the A1(N) and Harrogate, and southwards to South & East York,

creative minds safe hands



A1(S) Tadcaster and Leeds via the A64. The A1237 carries a high volume of traffic and the A1237/ Askham Road/ Moor Lane roundabout is understood to experience some congestion in the morning and evening peak.

Access

The development site would be served by a vehicle access from Foxwood Lane. The junction would take the form of a priority arrangement, providing a 5.5m wide carriageway direct into the site with footway along both sides.

Foxwood Lane is subject to a 30mph speed limit and it is expected that vehicle speeds will not significantly exceed the speed limit given the traffic calming along the route.

Drawing A088531/ C001 attached shows the proposed access junction and the MfS visibility splays which would be suitable to serve 120 homes. The proposed access junction can be delivered within adopted highway or land under the control of client.

Accessibility

There are a number of schools and local facilities within an accessible walk of the development site. Westfield Primary Community School is located a kilometre to the north of the development site and can be reached within a 12-13 minute walk. York High School is accessible within a 15 minute walk from the proposed development. There is a Co-op food store and newsagents within a parade of shops on Foxwood Lane, which are approximately 600m away and can be reached within a 7-8 minute walk from the proposed development. There is a Tesco foodstore and a pub within a 12-13 minute walk to the south of the proposed development. Oaklands Sports Centre can be reached within a 15 minute walk from the development site. The average walking distance (DfT Walking Personal Travel Factsheet 2007) for all purposes is 0.7mile (1.12km), or a 14 minute walk. Therefore the local facilities are within a reasonable walking distance.

Much of York is within a 30 minute cycle ride of the site and there is a network of local routes which provide links to the city centre and other key destinations.

There are two bus stops located to the west of the proposed access and can be reached within a 2-3 minute walk from the centre of the development site and comprise shelters with timetable information. Regular and frequent services are available to/ from York City Centre at a 7-8 minute weekday frequency.



The site is accessible on foot or by bike to a range of useful local destinations, and there are public transport options available for journeys further afield.

Traffic Impacts

The TRICS database has been used to derive suitable multi-modal trip generation rates for the development site. Vehicle trip rates for the AM and PM peak hours are shown below, and have been used to predict the traffic generated by 120 homes on site for the main modes of travel. TRICS output files can be provided on request.

Selected Multi-Modal Rates and Predicted Generated Trips

Time Period	Arrivals		Departures	
	TRICS Rate	Trips	TRICS Rate	Trips
Car Driver Trips				
Weekday AM Peak Hour 08:00 to 09:00	0.152	18	0.420	50
Weekday PM Peak Hour 17:00 to 18:00	0.396	48	0.232	28
Pedestrian Trips				
Weekday AM Peak Hour 08:00 to 09:00	0.041	5	0.174	21
Weekday PM Peak Hour 17:00 to 18:00	0.067	8	0.051	6
Cycle Trips				
Weekday AM Peak Hour 08:00 to 09:00	0.006	1	0.017	2
Weekday PM Peak Hour 17:00 to 18:00	0.016	2	0.011	1
Public Transport Trips				
Weekday AM Peak Hour 08:00 to 09:00	0.007	1	0.022	3
Weekday PM Peak Hour 17:00 to 18:00	0.018	2	0.005	1

Trip rates are per dwelling

The site is anticipated to generate 68 additional vehicle movements in the AM peak hour and 76 additional vehicle movements in the PM peak hour. This traffic will be distributed via Askham Lane to the A1237 York Bypass and to Acomb, and via Foxwood Lane to Tadcaster Road. It is expected that the greatest proportion of traffic will be to/ from the A1237 York Bypass, but that the number of additional vehicles will be low, in the AM peak around 30 additional trips may add to the Askham Lane approach to the A1237 roundabout. During further planning stages the impact of the additional traffic on the local highway network will be assessed, but at this stage it is expected that some minor mitigation works may be needed at:

- The Askham Lane/ Foxwood Lane roundabout; if necessary these traffic impacts can be mitigated by roundabout improvements within developable land and public highway boundary.



- The Askham Lane/ Moor Lane/ A1237 roundabout; this is a sensitive junction, which experiences levels of congestion within the peak periods. The level of traffic expected to reach this junction is less than 30 trips on each approach and if necessary mitigation measures can be implemented within the public highway boundary.

The site is expected to generate 27 pedestrian movements in the AM peak hour. There is continuous footway from the development site to surrounding schools and facilities and no specific measures are required.

For a subsequent planning application a Transport Assessment will consider the transportation impacts in more detail.

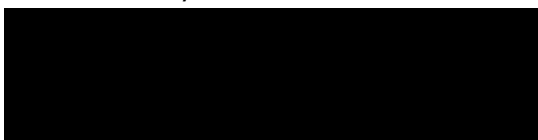
Summary

In response to the three key transportation issues to be considered as part of the process:

- 1) Access Suitable access arrangements for vehicles, pedestrians and cyclists can be provided at the development site, as indicated in Drawing A088531/ C001.
- 2) Accessibility The site is accessible on foot or by bike to a range of useful local destinations, and there are public transport options available for journeys further afield.
- 3) Traffic Impacts The site is expected to generate 68 motor vehicle trips in the AM peak hour and 76 in the PM peak hour. This level of additional traffic is not expected to result in any capacity problems but if necessary, mitigation measures can be delivered.

The development site satisfies the key transportation issues, and is suitable for allocation in the City of York Local Development Framework Submission Draft Core Strategy for residential development.

Yours sincerely



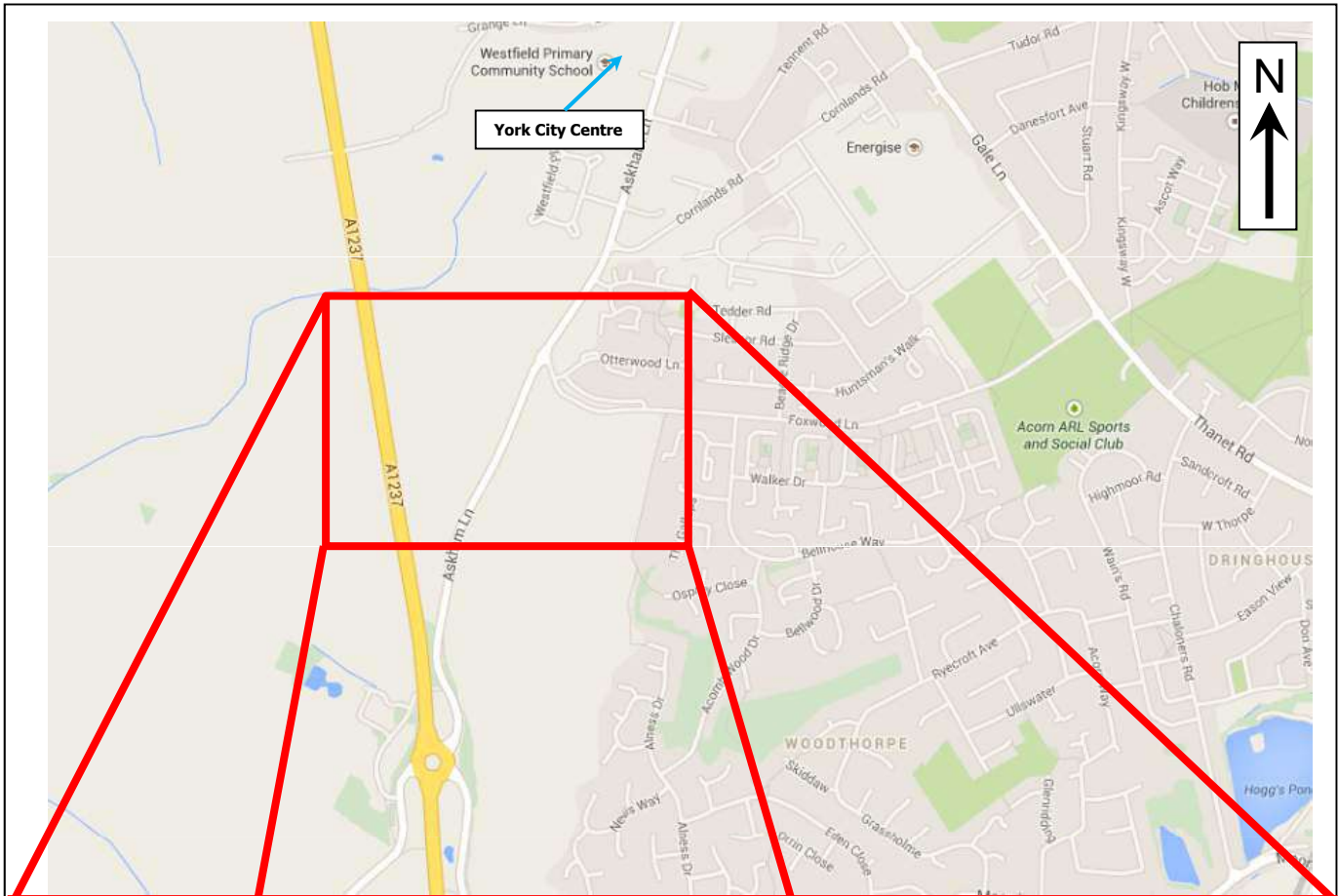
Dr Nick Bunn

Director

For and on behalf of WYG

Enc WYG Figure 1

Drawing A88531/ C001

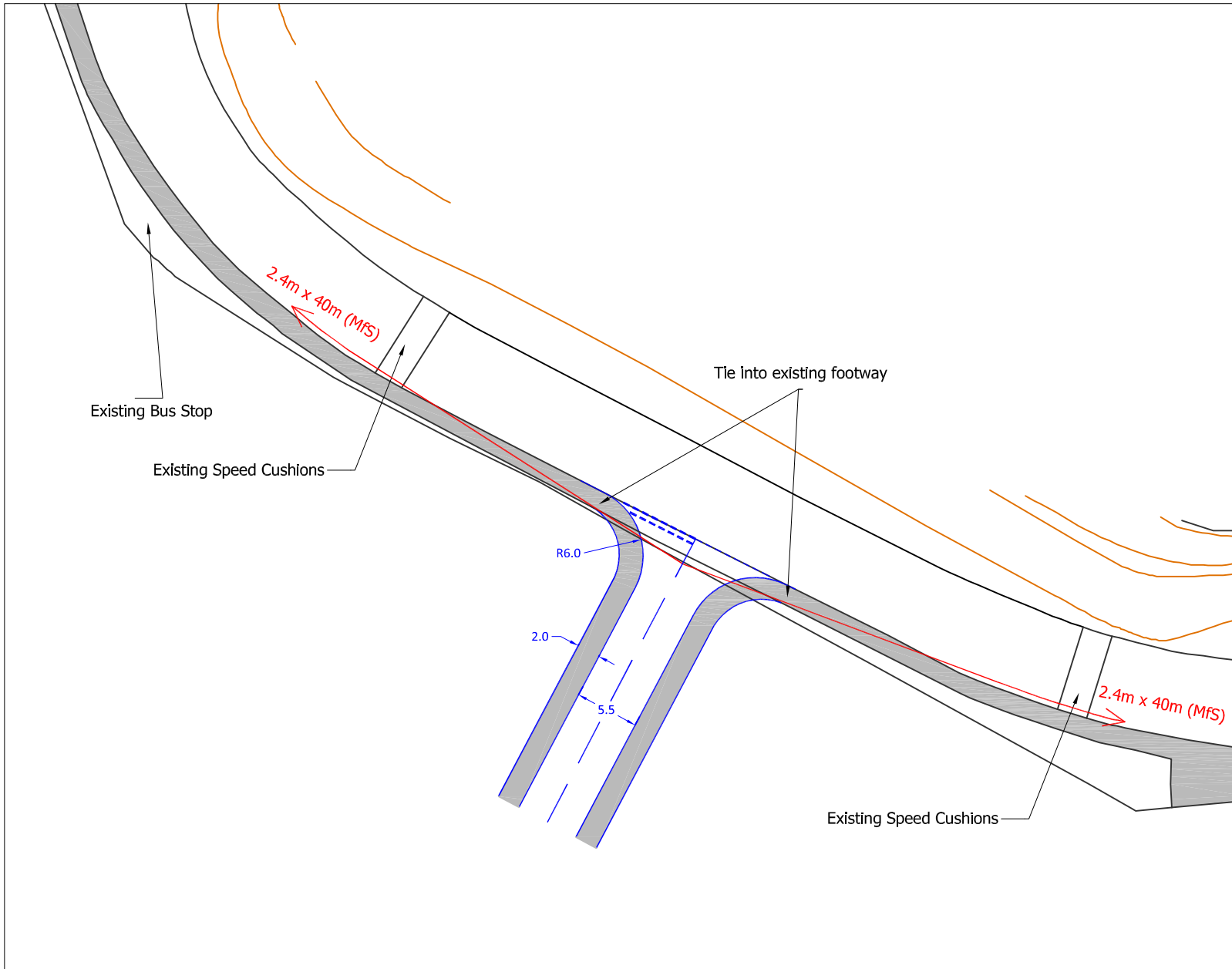


Land South of Foxwood Lane, Acomb, York

Site Location Plan

Figure 1





REV	DESCRIPTION	BY	CHK	APP	DATE
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Project:

LAND AT FOXWOOD LANE, ACOMB, YORK

Drawing Title:

PROPOSED SITE ACCESS JUNCTION

Scale @	A4	Drawn	Date	Checked	Date	Approved	Date
1:500		GW	14.07.14	AA	14.07.14	NB	14.07.14
Project No.	Office	Type	Drawing No.	Revision			
A088531	91	18	C001	-			



LANDSCAPE SCOPING REVIEW

FOR

LAND OFF ASKHAM LANE, YORK

July 2014
Rev A



Wainwright
Landscape Architecture

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- Statutory Designations (MAGIC)
- Other non-statutory designations (MAGIC)

1.0 Introduction

Wainwright Landscape Architecture was commissioned by Smiths Gore in July 2014 to undertake a landscape scoping review for an area of land off Askham Lane near York.

This report aims to provide a summary of available site information in relation to landscape planning context, statutory landscape and heritage designations, views and visibility, landscape character. The report will review issues identified in the City of York Council's technical officer assessment for Historic Environment, Landscape and Design, and suggest how these could be mitigated should the site be developed.

A site visit was undertaken during July 2014 in order to review key views and general visibility of the site. A desk study collecting information on the physical, historical and cultural elements contributing to landscape character was collected from the following resources:

Cultural and natural environment information held on the government's geographic information MAGIC website, managed by Natural England.

National Landscape Character Area information and descriptions from Natural England;

North Yorkshire and York Landscape Characterisation Project, Chris Blandford Associates, May 2011;

York Landscape Appraisal, ECUS, 1996;

Ordnance Survey maps (1:25,000 Explorer Series);

North Yorkshire County Council Online Mapping and Aerial Photographs;

City of York Council Online Mapping and Document Archive;

Site 792 – Land South of Foxwood Lane, Acomb (City of York Council technical officer assessment).

2.0 Description of the site

The site is located at Acomb Moor on the south west fringe of York near the settlements of Acomb and Woodthorpe, within the City of York Council planning area. To the west are Askham Lane and the A1237 and to the north is Fox Wood Lane.

Land to the west and south is low-lying arable farmland while to the north and east is urban settlement. The local topography is gently undulating and rises quickly from 20-30m AOD at 'Great Knoll', a low rounded hill to the south side of the site, with 'Gravel Hills' to the west side.

The site is approximately 4.5ha and comprises arable grazing land with mixed hawthorn and ash hedgerows on most sides. The site is located within the edge of draft Green Belt and several informal footpaths cross or connect close to the site.

3.0 Landscape Planning Context

Draft Green Belt

The City of York Council is currently preparing a new Local Plan in line with the National Development Framework 2012. This will replace the 2005 Draft Local Plan.

The site is situated within draft Green Belt. The main purpose of the Green Belt around York is:

“to preserve the setting and the special character of the historic City. The most critical elements of the character are a series of green wedges (essentially the strays and floodplains), which run into the heart of the City from the surrounding areas of open countryside, and the relationship between the urban areas and the surrounding villages¹.”

Work undertaken as part of the Green Belt Review² identified the most valuable parts of the Green Belt needed to protect York’s setting. This included areas which provide an impression of a historic city situated within a rural setting. The site is identified as Area F3 South and West of Woodthorpe, shown on Green Belt Appraisal Map - South as ‘Areas Retaining the Rural Setting of the City’³. These were identified as important for the following reasons:

- i) Open countryside visible from a prominent location enables views of the city, the historic character of which is particularly important.
- ii) Areas afforded either good views of the Minster or the urban edge comprised of a Conservation Area, the historic character of which is important to retain.”

As part of the LDF review, the Historic Character and Setting Technical Paper further consider the arable land immediately to the south of the site⁴. It’s potential to be removed from ‘Area Retaining the Rural Setting of York’ and use for residential development is rejected, recommending no change to historic character and setting boundary.

Listed Buildings, TPO’s, PROW, POS, Other Designations

One Tree Preservation Order (TPO3-G2) is located to the northern boundary of the site and includes an ash and two sycamore trees. There are no Listed Buildings, Public Rights of Way (PROW), Public Open Space or other planning designations directly affecting the site.

Several footpaths cross the site but these seem to have been established informally and are not listed as PROW. The site also appears to be used by local residents as informal open space, but has no formal designation.

¹ City of York Draft Local Plan Incorporating the 4th set of Changes, approved April 2005, chapter 5.

² City of York Local Plan. The Approach to the Green Belt Appraisal, City of York Council, 2003.

³ Green Belt Appraisal Map – South, City of York Council, 2002.

⁴ City of York LDF. Historic Character and Setting Technical Paper, City of York Council, 2011 (Site 11 Land East of Askham Lane).

Key Issues

- The site is identified as an 'Area Retaining the Rural Setting of York'.
- Emphasis is placed on 'Open countryside visible from a prominent location enables views of the city'.
- TPO3-G2 is located on the northern site boundary.
- Several informal footpaths have been established across the site.
- The site is being used as informal open space.

4.0 Heritage and Archaeology

Site History

The City of York is included within the County historic landscape Characterisation project (HLC) and described as Planned Large Scale Parliamentary Enclosure, typically concentrated in lower areas often with a large degree of boundary loss due to changing farming practices⁵. Historical Ordnance Survey maps held on NYCC's HLC website indicates that 'York & Ainsty Kennels' once existed on the site⁶. This together with the naming of Fox Wood Lane suggests a possible association with the York and Ainsty Hunt which was extremely active in the area during the 1800's⁷.

Key Issues

- The site may have some local historical significance due to possible connection with the York and Ainsty Hunt.
- The site has a precedent of being partly developed in the past.
- An archaeological desk study / investigation would usually be expected to support a planning application on a greenfield site.

5.0 Landscape and Design

Geology and Topography

The soils on the site are described as 'Loamy soils with Naturally High Groundwater'⁸. The underlying geology on the site is described as having 'Superficial Deposits of Sand and Gravel'⁹. This is also supported by the characteristic localised undulating topography at 'Great Knoll' to the south of the site and the naming of Gravel Hills to the west of the site.

Trees and Vegetation

The site is mostly bounded by tall deciduous hawthorn hedgerows with some ash. Boundaries are open to the northeast side. There are very few mature trees on the site boundary.

⁵ North Yorkshire, York and Lower Tees Valley Landscape Characterisation, NYCC and Tess Archaeology, 2010 (ADS Website).

⁶ Historical Landscape Character Mapping NYCC Online Version, 1889-99 & 1846-63.

⁷ A History of the York and Ainsty Hunt, William Scarth Dixon, 1899.

⁸ Soilscales, Cranfield Soil and Agrifood Institute, online mapping.

⁹ Yorkshire and Humber Region Aggregate Minerals Resource Map, BGS / MIRO, 2008.

Landscape Character

The area of the site is described as 'Character Type 28 - Vale Farmland with Plantation Woodland' within North Yorkshire's Landscape Character study¹⁰. The study describes Key Characteristics within the character type as:

- "A patchwork of low lying, predominantly arable fields, often delineated by a network of mature hedgerows and interspersed with patches of regular-shaped mixed and coniferous plantation woodlands;
- Large heathlands are key features on sandy soils;
- Distant visual containment is provided by higher Landscape Character Types to the east and west;
- Strong sense of openness throughout much of this Landscape Character Type;
- Scattered settlement pattern of towns, villages and farmsteads within the landscape around the main historic City of York (which forms part of the Urban Landscapes Primary Landscape Unit);
- A network of trunk roads linking the larger settlements and towns."

York's landscape appraisal¹¹ describes the site as falling within Landscape Character Type 1 – Flat, Open Arable Farmland, with the following key characteristics:

- "generally flat and low lying
- predominantly arable land use
- medium to large regular shaped fields
- generally quite open
- hedges and hedgerow trees
- traditional settlements
- negative influences of new development
- often noisy"

However the site is rather more un-typical of the wider character types, being relatively enclosed and discrete within localised gently rolling topography.

Views and Visibility

The western and lower north eastern parts of the site are generally screened by the local undulating topography blocking and filtering long distance views towards the site from the west and south. Views are relatively well contained and do not extend to the wider open landscape and historic York.

The west side of the site is generally screened from the highway by the tall boundary hedgerows. The east side of the site is at a lower elevation with more open boundaries and views north and east towards housing on Fox Wood Land and Stirrup Close with the central southern part of the site being most elevated and visible. Views from housing along Foresters Walk are also partly screened by dense planting and mature trees.

There are few evergreen tree and hedgerow species so visibility is likely to increase during the winter months when trees are without leaves. Views of the site are generally limited to fringe properties directly overlooking the site.

¹⁰ North Yorkshire and York Landscape Characterisation Project, NYCC and Chris Blandford Associates, 2011.

¹¹ York Landscape Appraisal, ECUS, 1996.

Key Issues

- The site has a distinct local undulating topography at 'Great Knoll' and Gravel Hills.
- Parts of the site are screened by the topography, particularly long distance views from the west and south. Views to the A1237 are limited and do not extend to historic York.
- The western side of the site is visible and open to fringe properties around the site.
- Development of the central southern part of the site is more visible due to elevation and may require appropriate mitigation as part of any site design to address this.

6.0 Open Space and Recreation

Footpaths and Public Rights of Way

There are several informal footpaths across and connecting to the site, although these are not formal PROW. There are limited connections to the wider PROW network.

Public Open Space

The site is used by local residents for dog walking although the site is not subject to any formal designation as open space. The site is currently used for grazing and not ploughed as arable land.

There is an area of official informal natural and semi-natural open space off The Gallops to the SE of the site connected by a footpath along the eastern boundary. Other amenity greenspace is located nearby off Tedder Road to the north, and at Bachelor Hill to the north of the site.

Key Issues

- The site may be regarded as informal open space by local residents due open access.
- Residents may resist redevelopment of the site due to perceived loss of footpaths and 'open space'.

7.0 Discussion and Summary

The site is situated within the City of York draft Green Belt. Additionally the site is part of an area of land identified by the City Council 'Areas Retaining the Rural Setting of the City'.

The criteria to determine 'Areas Retaining the Rural Setting of the City' is partly based around 'Open countryside visible from a prominent location enabling views of the city', and 'Areas affording either good views of the Minster or the urban edge comprised of a Conservation Area'.

The site is relatively well screened by local undulating topography, particularly long distance views from the West and the south, including the Outer Ring Road A1237 and Askham Lane. The central southern part of the site does rise quickly towards 'Great Knoll' but views are locally contained to fringe housing to the north and east of the site along Fox Wood Lane and Stirrup Close. York Minster does not form a significant part of views to the site.

However this area of landscape does provide a transition between the urban fringe and rural countryside. The rolling topography and elevation of part of the site at 'Great Knoll' are an important

part of local landscape character. The layout, density and character of any potential development on the site must be carefully considered and appropriately mitigated.

Other than the draft Green Belt and one TPO on the northern boundary, there are no statutory or non-statutory landscape planning designations affecting the site.

Historical maps do suggest that part of the site has been developed in the past by 'York & Ainsty Kennels'. This may have local historical significance in relation to the York and Ainsty Hunt, active within the area during the 1800's. An archaeological desk study / investigation would usually be expected to support a planning application on a greenfield site.

The site is relatively well screened during the summer from Askham Lane by highway boundary hedges and along Fox Wood Lane and Foresters Walk. Views are likely to be more open during the winter months due to a lack of evergreen tree and hedgerow species. There are no boundary hedgerows to the NE side of the site.

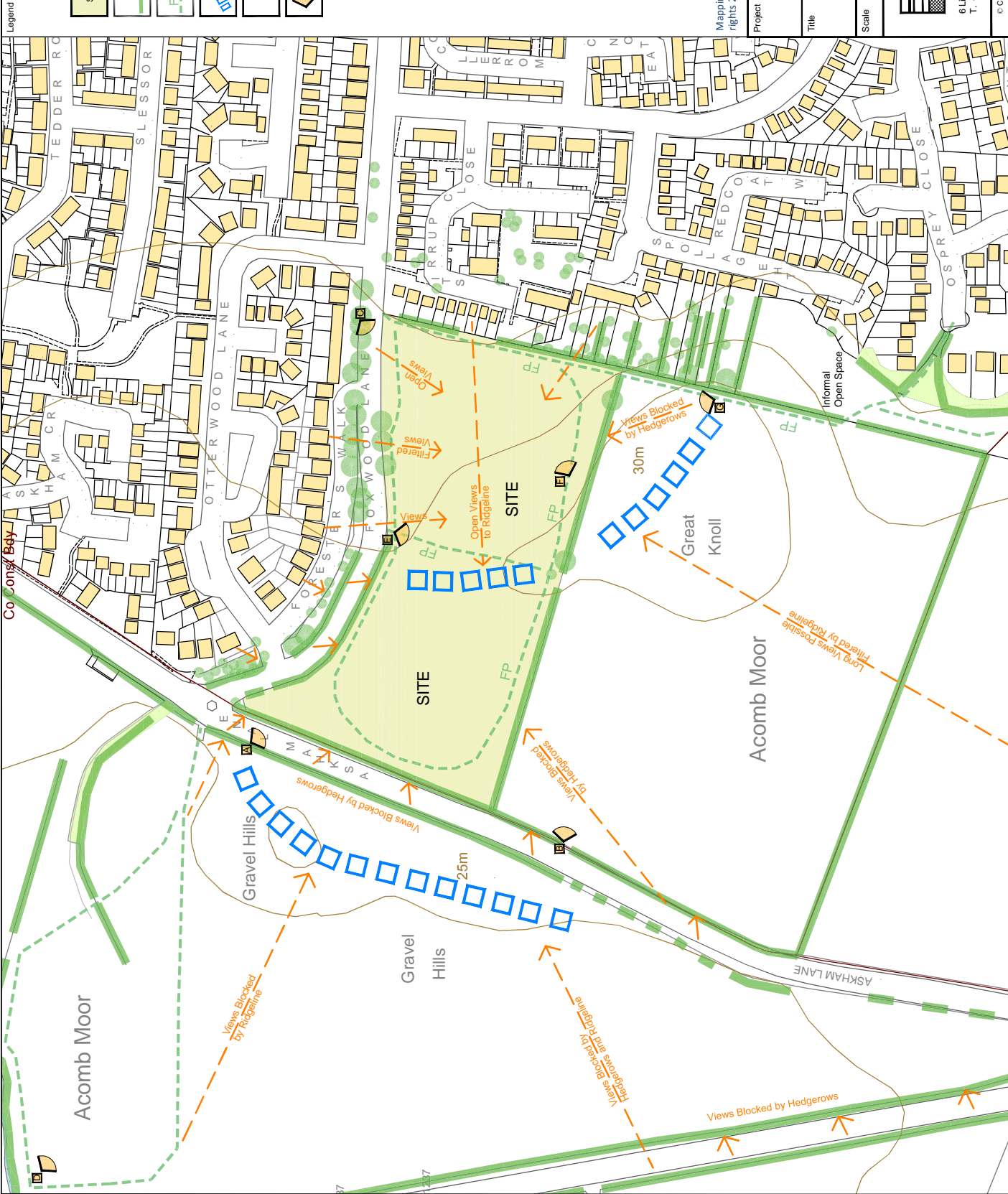
Several footpaths cross the site which are used by local residents. There are several other areas of informal amenity green space located close to the site. There are no formal PROW or areas of formal play connected to the site. Local planning authorities would typically expect new development proposals to support improvement of local open space provision either by creation of new POS within the site, or by agreement of a commuted sum to improve other facilities nearby.

8.0 Guidance for Design and Mitigation

The following design and mitigation measures should be considered to guide development on the site:

- A detailed visual assessment should be undertaken to guide site layout and placement of landscape screening. The assessment should consider short and long distance views and use cross sections to help establish limits of visibility.
- A site archaeology desk study should be undertaken to determine whether further site investigation is required.
- Development design should be sympathetic to local character, topography and setting, using local building styles and materials.
- Consider reducing development height and density and incorporate POS and planting within more elevated parts of the site to reduce visibility and help integration.
- Protect and retain existing hedgerows and trees around the site. Tree protection areas for mature site trees should be defined and fenced during construction.
- Restore fragmented gappy hedgerows through replanting and allow hedgerows to grow taller and thicker to provide landscape enhancement and wildlife opportunities.
- Encourage planting of new broad-leaved woodland as small copses for landscape structure and biodiversity.
- Tree and hedgerow planting should use locally occurring native species.
- Identify opportunities to formalise footpath connections to the site with links to POS.

Figures and Illustrations



Legend

- The Site
- Trees and Hedgerows
- Footpath
- Minor Topographical Horizon (Ridgeline)
- Key Views
- Photograph View Location

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Project LAND OFF	
Title ASKHAM LANE, YORK	
SITE ANALYSIS	
Scale 1:2,500	Fig No. 01
Wainwright Landscape Architecture	
6 Lindale Lane, Wrenthorpe, Wakefield, WF2 0PN T. +44 (0)1924 381256 E. info@wainwrightia.co.uk © Copyright Wainwright Landscape Architecture	



A



B




C



D

- View A - Looking south-east towards the site showing the site boundary hedgerow from Askham Lane.
- View B - Looking towards the north-east showing the site southern boundary hedgerow from Askham Lane.
- View C - Looking towards the south-west across the site from Askern Lane.
- View D - Looking south-east towards site with Gravel Hills in the foreground.

Project		LAND OFF	
		ASKHAM LANE, YORK	
Title		PHOTOGRAPHIC	
		VIEWPOINTS A, B, C, D	
Scale	NTS	Paper	A3
		Fig No.	02
 Wainwright Landscape Architecture		6 Lindale Lane, Wrenthorpe, Wakefield, WF2 0PN T. +44 (0)1924 381256 E. info@wainwright.co.uk <small>© Copyright Wainwright Landscape Architecture</small>	



E



F




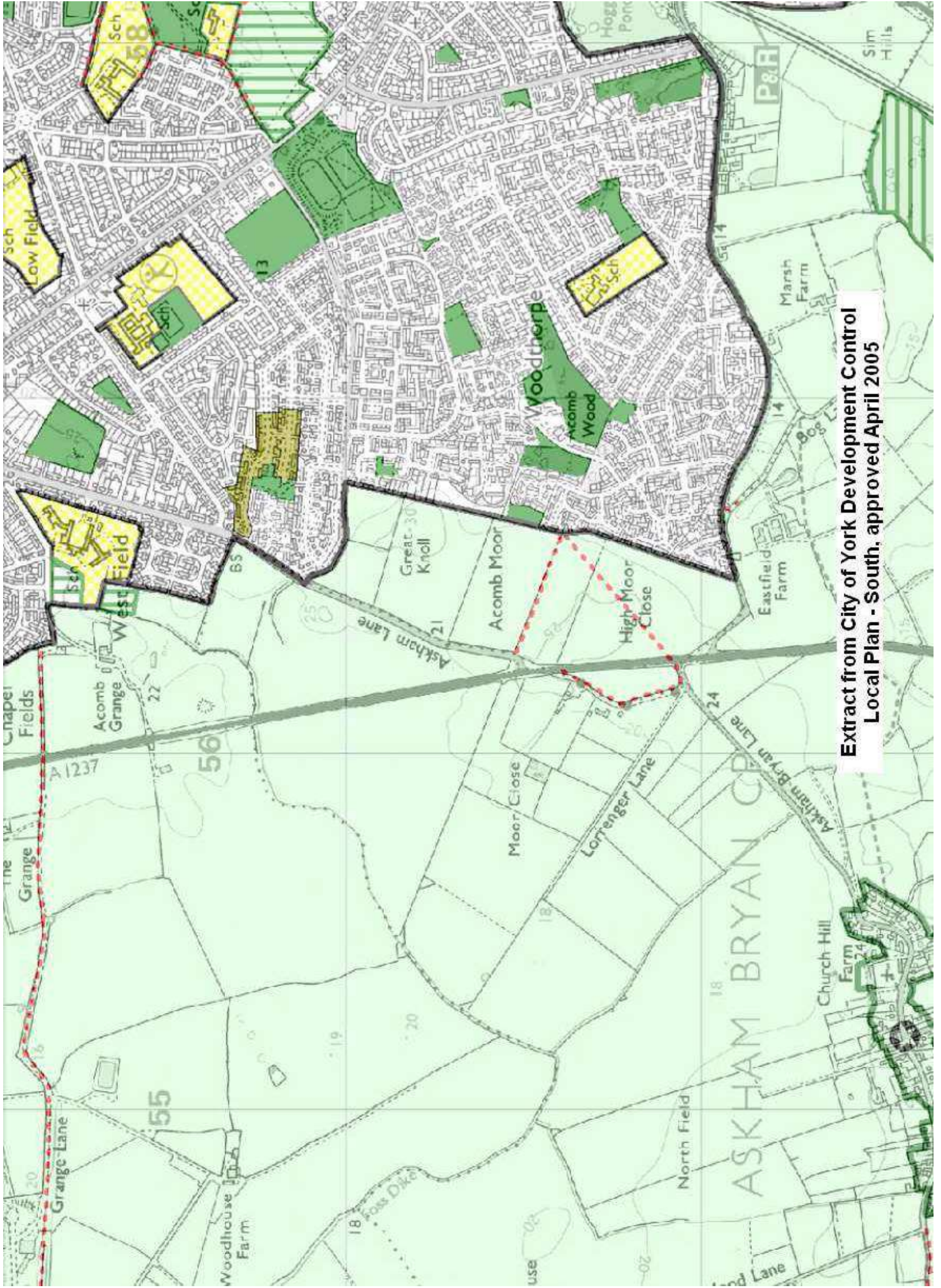
G

View E - Looking south across the site from Askham Lane along the site central footpath.

View F - Looking northwards across the site from the southern hedgerow boundary.

View G - Looking northwards towards the site southern hedgerow from the east boundary footpath.

Project		LAND OFF	
		ASKHAM LANE, YORK	
Title			
PHOTOGRAPHIC			
VIEWPOINTS E, F, G			
Scale	NTS	Paper	A3
		Fig No.	03
 Wainwright Landscape Architecture			
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**Extract from City of York Development Control
Local Plan - South, approved April 2005**



KEY

	Local Plan Boundary
	City Centre Inset Boundary
LOCAL PLAN STRATEGY (CHAPTER 1)	
	Action Area (SP9)
GENERAL PLANNING POLICIES (CHAPTER 2)	
	Open Space (GP7)
	Reserved Land (GP24a)
	Mixed Use Site (please note different policies apply)
NATURAL ENVIRONMENT (CHAPTER 3)	
	Site of Special Scientific Interest (NE4a)
	RAMSAR Sites (NE4a)
	Special Protection Area (NE4a)
	Special Area of Conservation (NE4a)
	Non Statutory Nature Conservation Site (NE5a)
HISTORIC ENVIRONMENT (CHAPTER 4)	
	Conservation Area (HE3) (see appendices)
	Area of Archaeological Importance (HE10) (see appendices)
	Historic Park / Garden (HE12)
GREEN BELT (CHAPTER 5)	
	Green Belt (SP2)
	Defined Settlement Limit
	Defined Settlement Limit (GB2)
	Major developed site in the Green Belt (GB10a)
TRANSPORT (CHAPTER 6)	
	Pedestrian Priority Zone - Footstreets (T1)
	Proposed Cycle / Pedestrian Network (T2) - Indicative Locations
	Proposed Cycle/Pedestrian Bridge (T3a)
	Park and Ride Allocation (T6)
	Railway Station site (T8a)
	Highway Improvement Scheme (T19a)
	Potential Park and Ride (T6) - Indicative Locations
HOUSING (CHAPTER 7)	
	Housing Allocation (H1.6, H1.24, H1.31 to H1.37, H1.39 to H1.41, H1.43 to H1.46)
EMPLOYMENT (CHAPTER 8)	
	Premier Employment Allocation (E12a to E12d and E12f)
	Standard Employment Allocation (E3a.1 to E3a.10)
EDUCATION (CHAPTER 9)	
	Educational Establishments (ED1 and ED6)
	St Barnabas Centre (ED2)
	Existing University of York Heslington Campus (ED6)
	New University Campus (Phase 2) Indicative Boundaries (ED9)
	New University Campus (Phase 1) Indicative Boundaries (ED9)



SHOPPING (CHAPTER 10)

	Shopping Sites (S1a)
	District Centres


LEISURE AND RECREATION (CHAPTER 11)

	Recreational Opportunity Areas (L1d)
	Recreational Opportunity Areas (L1d)

COMMUNITY FACILITIES (CHAPTER 13)

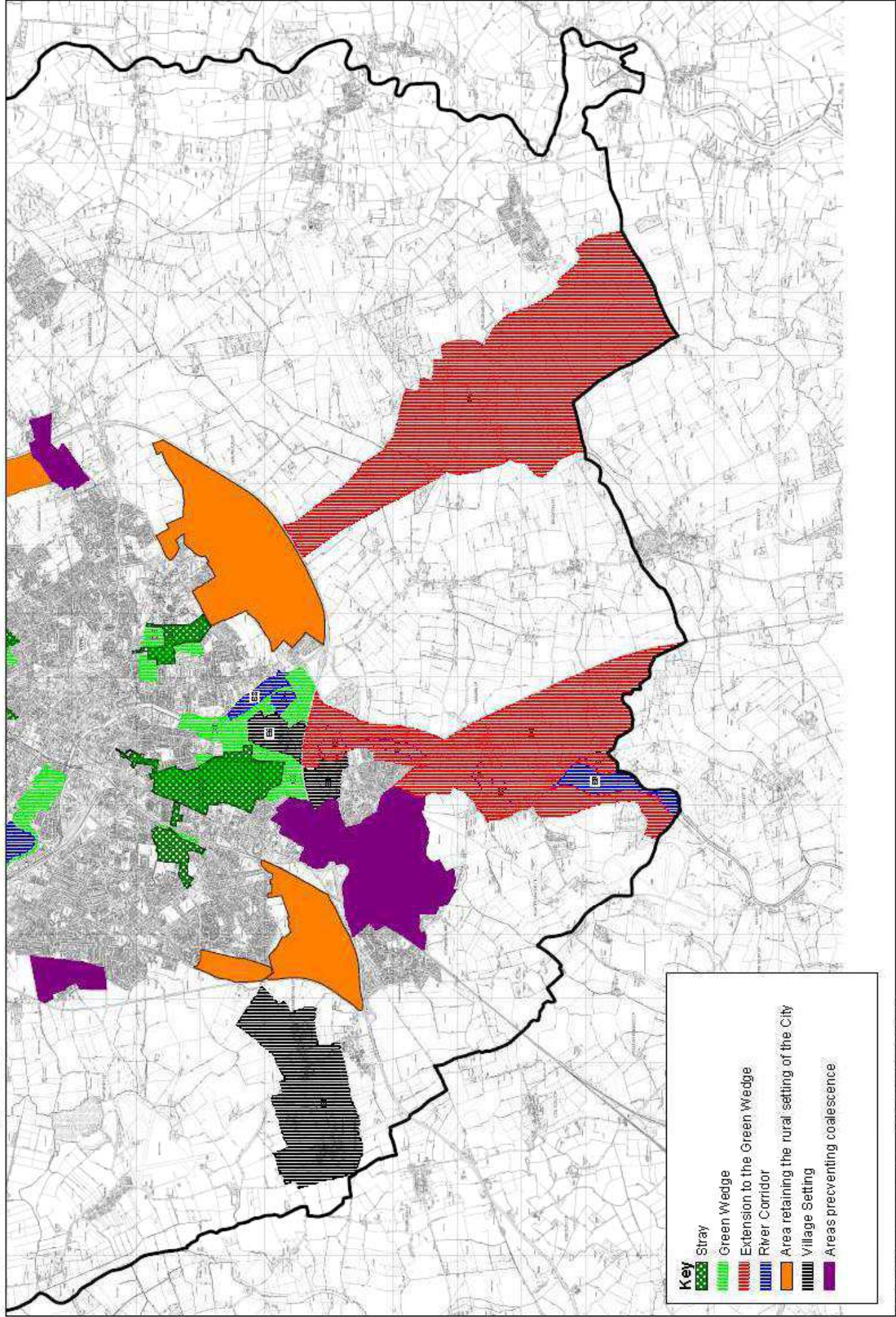
	York District Hospital (C4)
	Bootham Park Hospital (C5)

MINERALS AND WASTE CHAPTER 14

	Area of Search for Minerals (M01)
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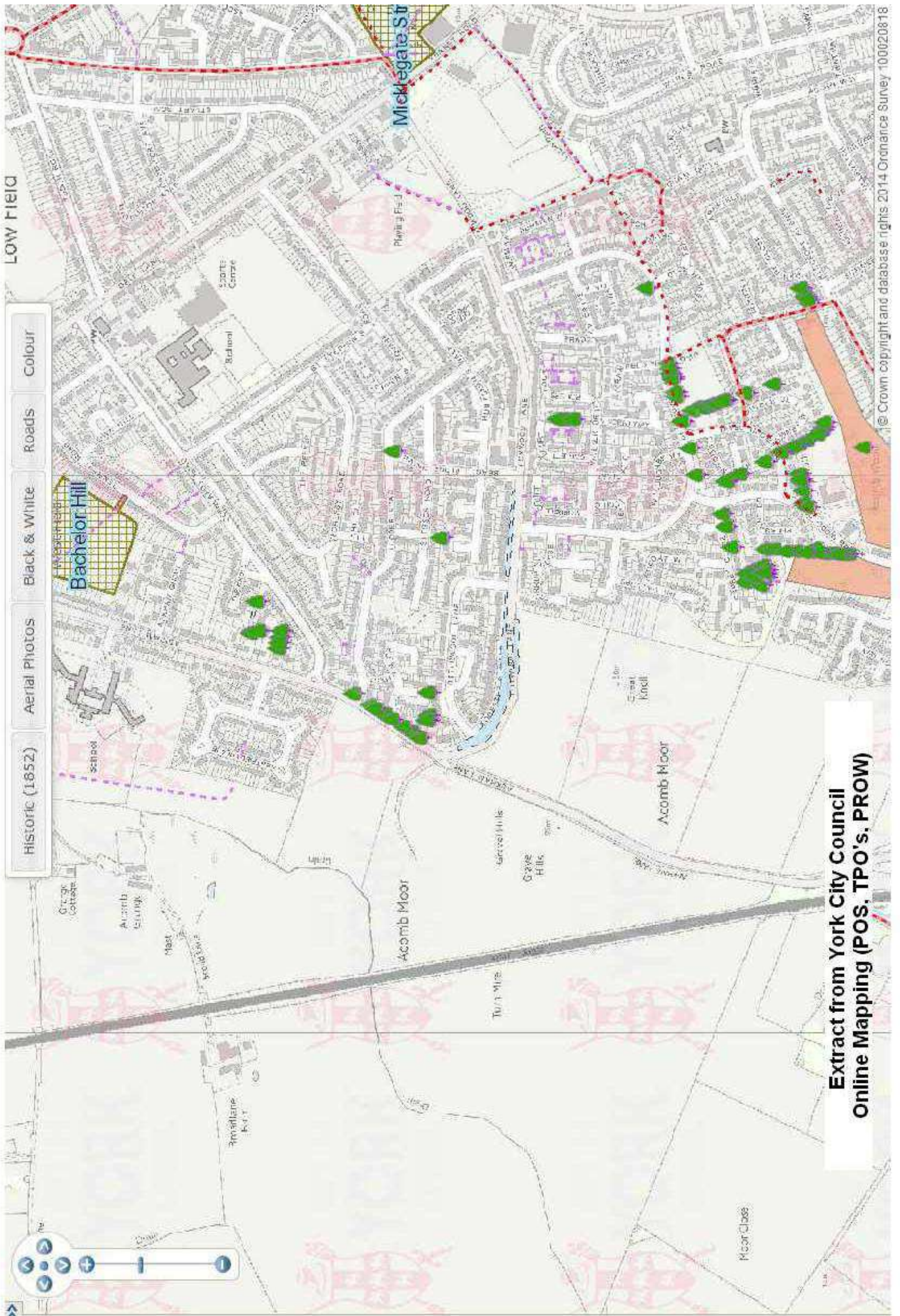
**Extract from City of York Development
Control Local Plan - South, approved April
2005**

Greenbelt Appraisal Map - South

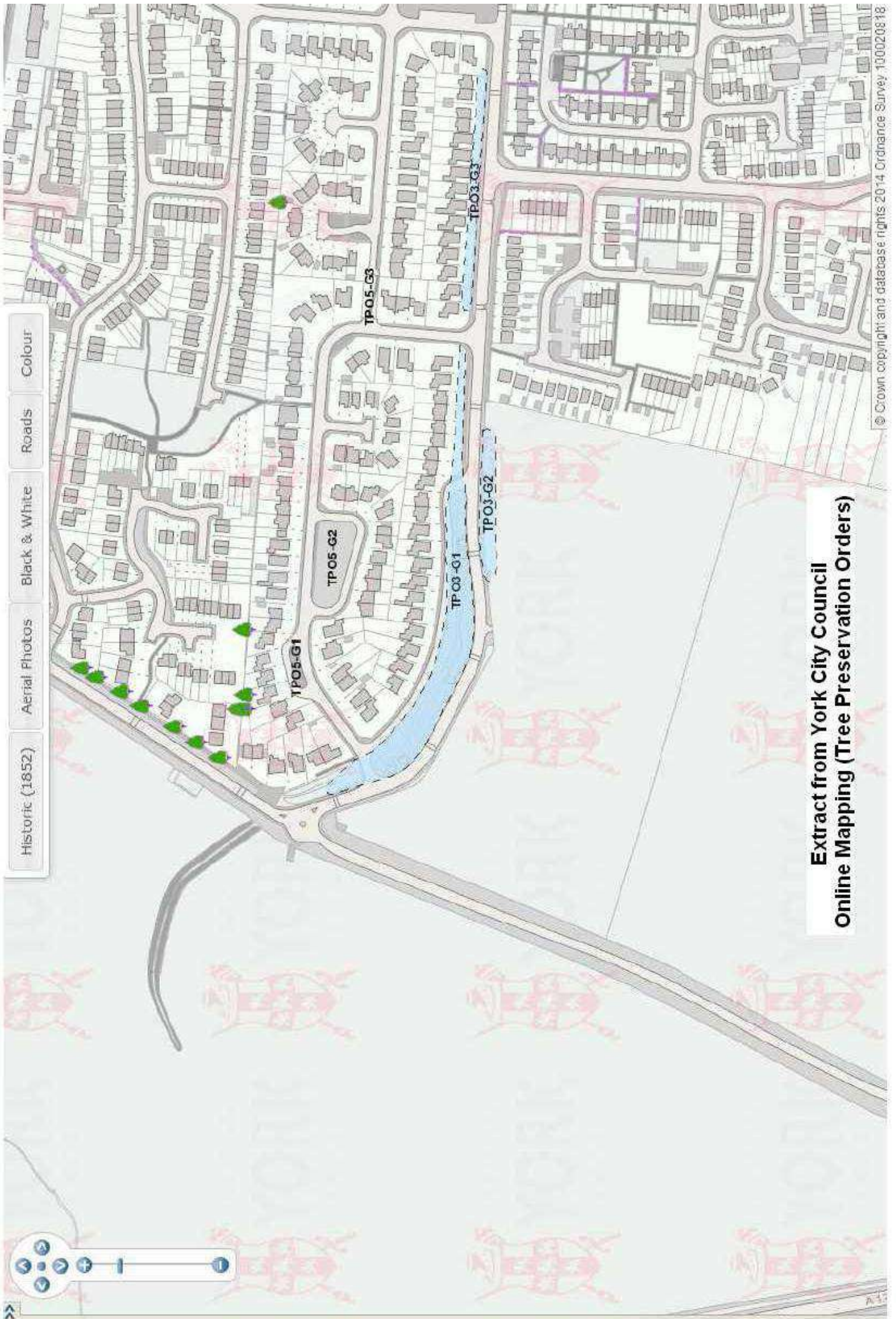


Key

- Stray
- Green Wedge
- Extension to the Green Wedge
- River Corridor
- Area retaining the rural setting of the City
- Village Setting
- Areas preventing coalescence



**Extract from York City Council
Online Mapping (POI, TPO's, PRO)**



**Extract from York City Council
Online Mapping (Tree Preservation Orders)**

Site 11: Land east of Askham Lane

Proposed Change: Remove land from 'Area Retaining the Rural Setting of York' and use for residential development.




Comments via: Consultation responses to the Core Strategy and Allocations DPD.

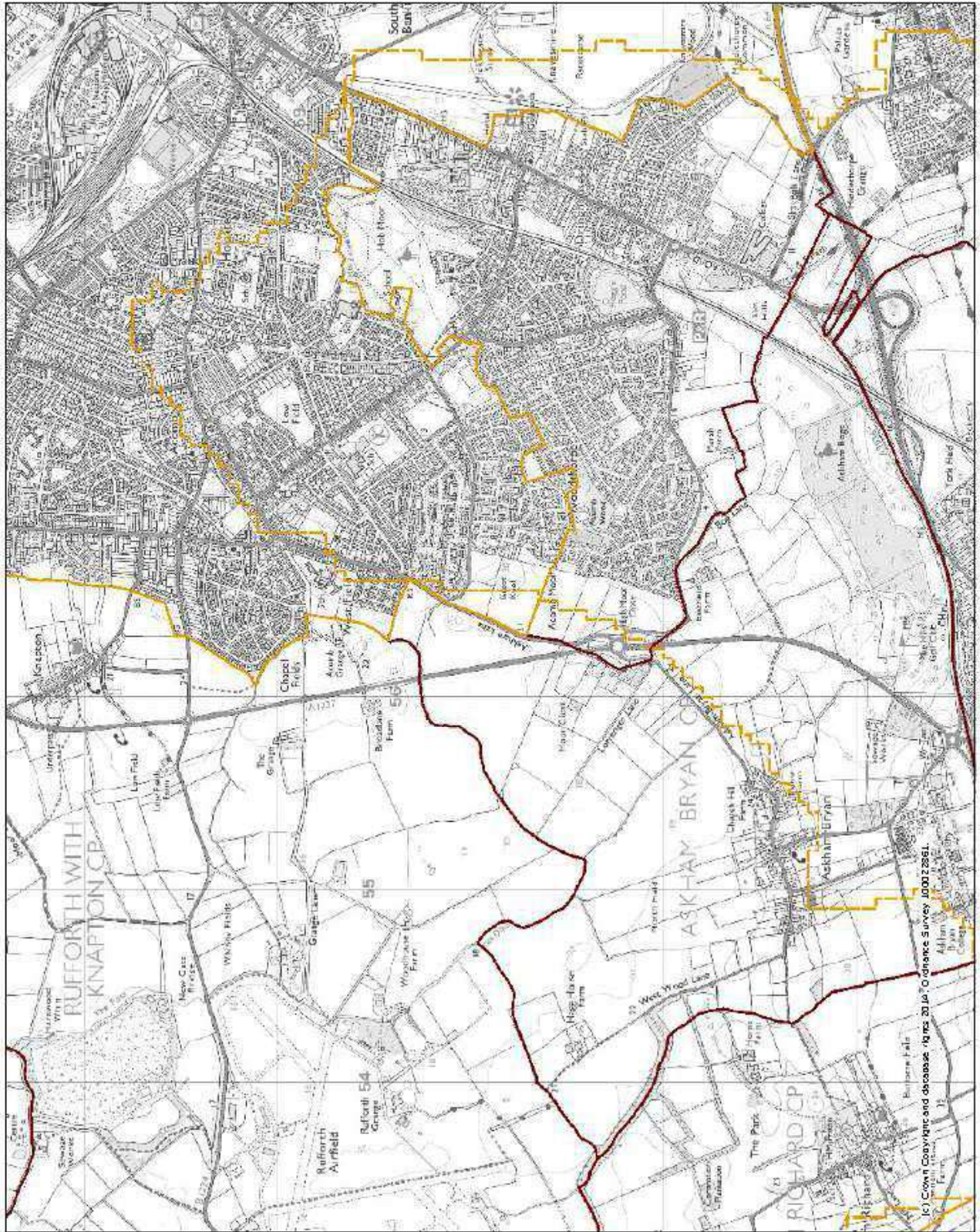


Comment ref / objector	161: Persimmon Homes 2542: Terence O'Rourke
Summary of objector's comments	The Green Belt boundaries are drawn excessively tightly around York, and that the land should be released from the Green Belt for Housing development.
Officer comments	The site lies within the 'Area Retaining the Rural Setting of the City' (F3). The area of land is essential to the rural setting of York – providing an interface between the built up part of York and the flat rural areas beyond the Outer Ring Road.
Officer recommendation	No change to historic character and setting boundary.

**Extract from Historic Character and Setting
Technical Paper, York City Council, 2011.**

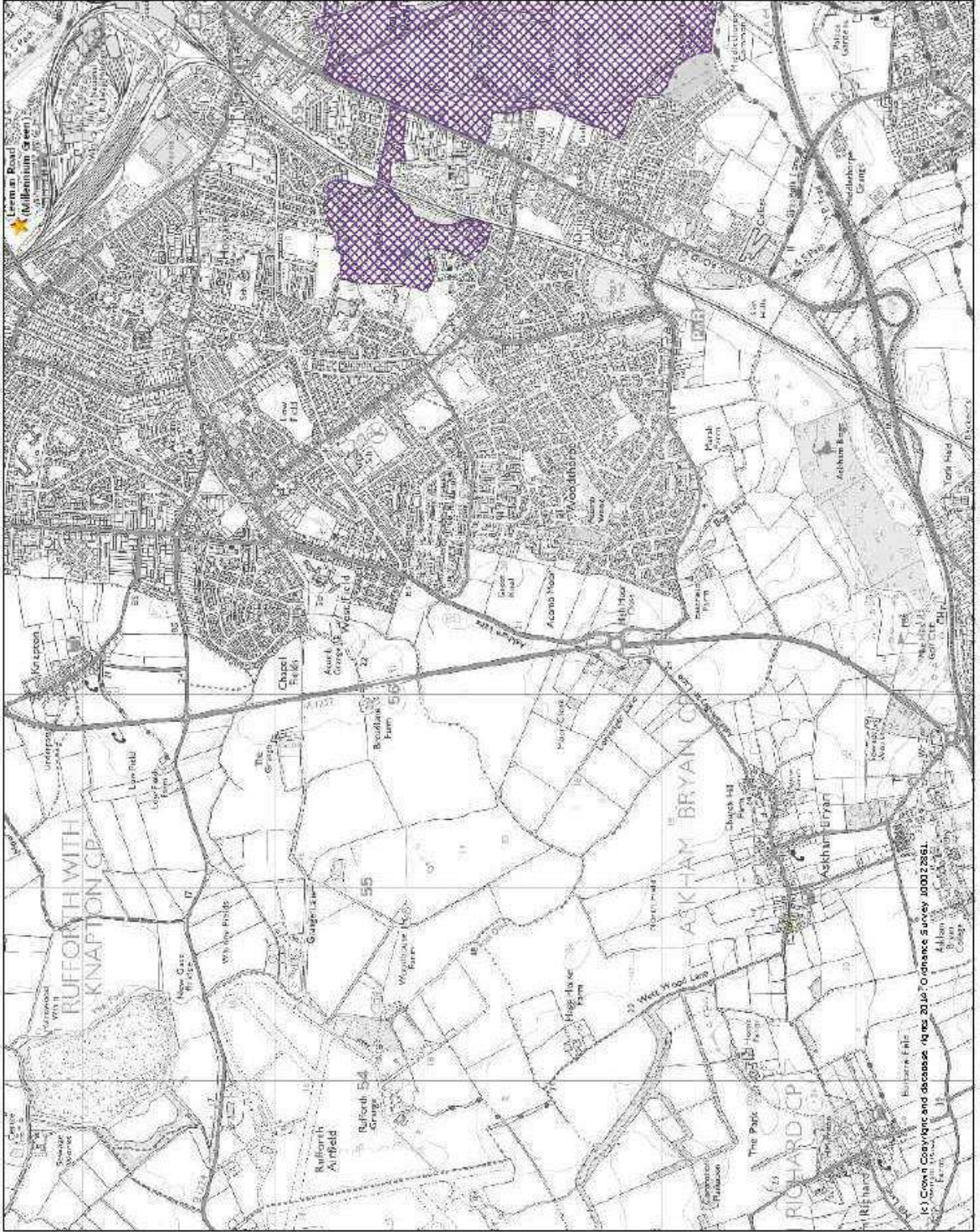
Legend

-  Catchment Abstraction Management Strategy (CAMS) Reference Boundaries (England and Wales)
-  Parliamentary Constituency notes (England)
-  Parishes (GB)



Projection = OSGB36
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 ymin = 007900
 xmax = 059700
 ymax = 052200

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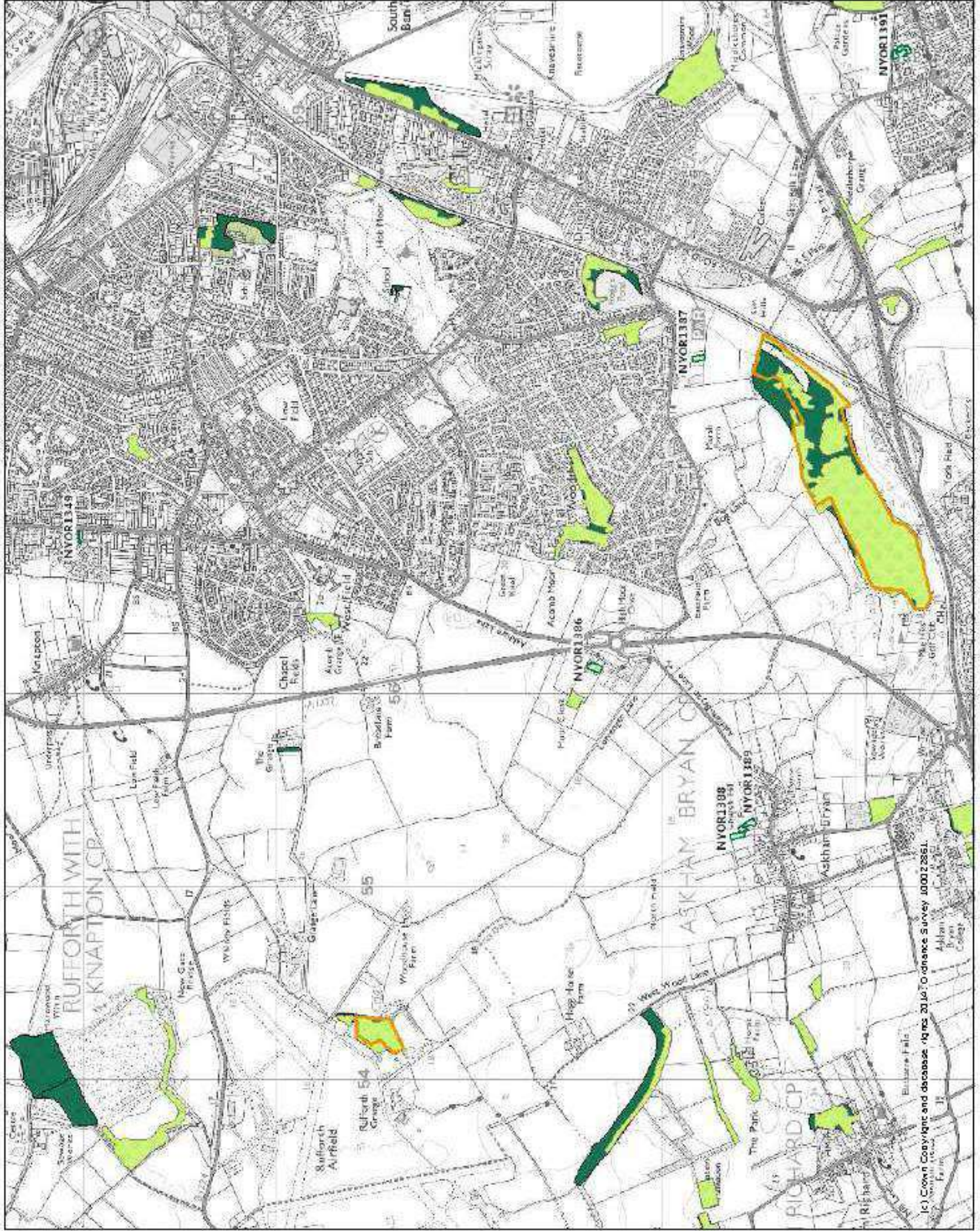


Legend

-  National Trails (England)
-  Doonstep Greens (England) - points
-  Millennium Greens (England) - points
-  Country Parks (England)
-  Registered Common Land (England)
-  Countryside and Rights of Way Act, Section 15 Land (England)
-  Countryside and Rights of Way Act 2000 - Access Layer (England)

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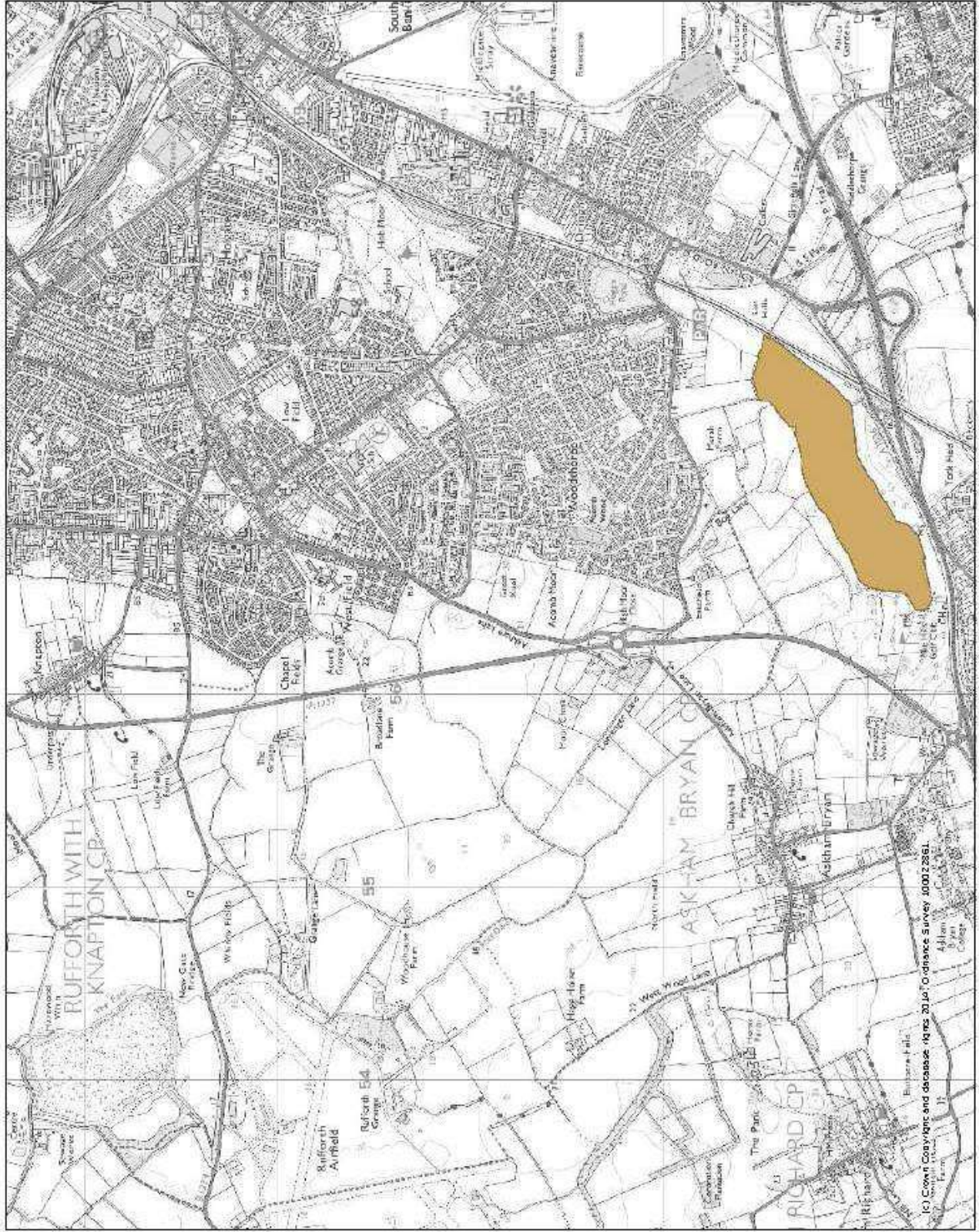


Legend

-  Ancient and Semi-Natural Woodland
-  Ancient Replanted Woodland
-  Traditional Orchard BAP Priority Habitat (England)
-  Deciduous Woodland BAP Priority Habitat (England)
-  National Inventory of Woodland and Trees (England)
-  Woodpasture and Parkland BAP Priority Habitat (England)

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Legend






Fens BAP Priority Habitat
(England)

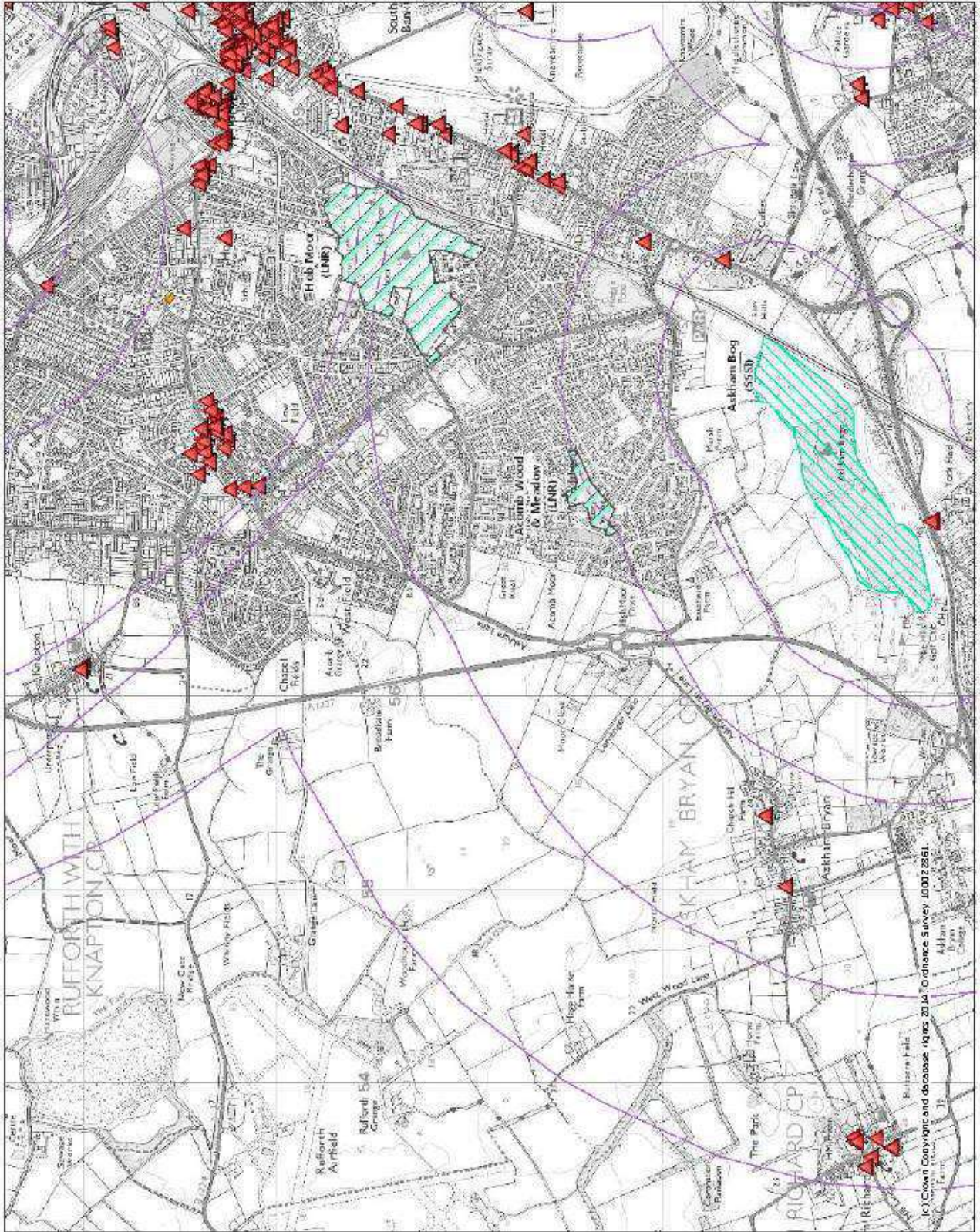


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information in MAGIC is a synthesis of the information
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Legend

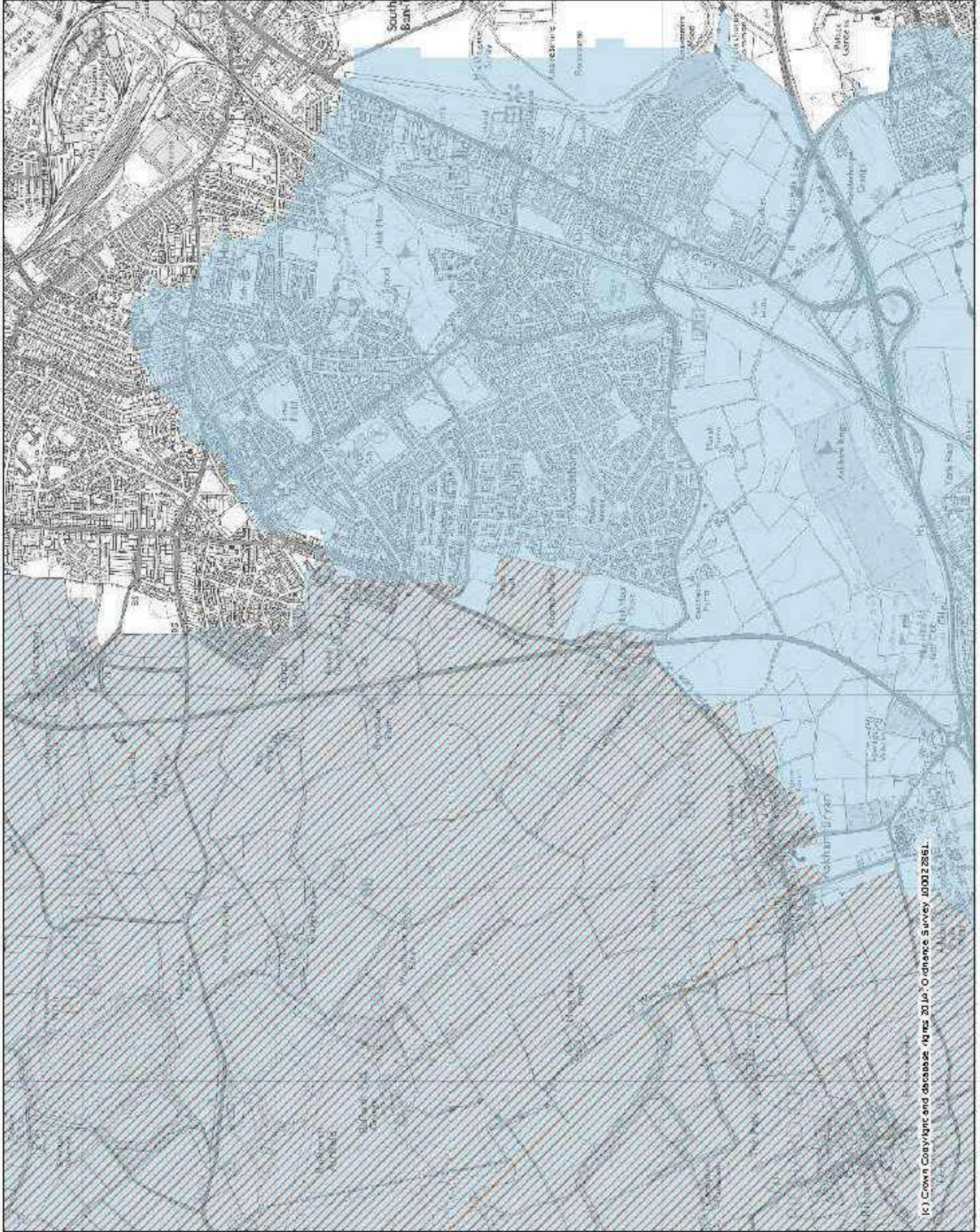
-  Local Nature Reserves (England)
-  Sites of Special Scientific Interest (England)
-  SSSI Impact Risk Zones (England)
-  Scheduled Monuments (England)
-  Listed Buildings (England)



Projection - OSGB36
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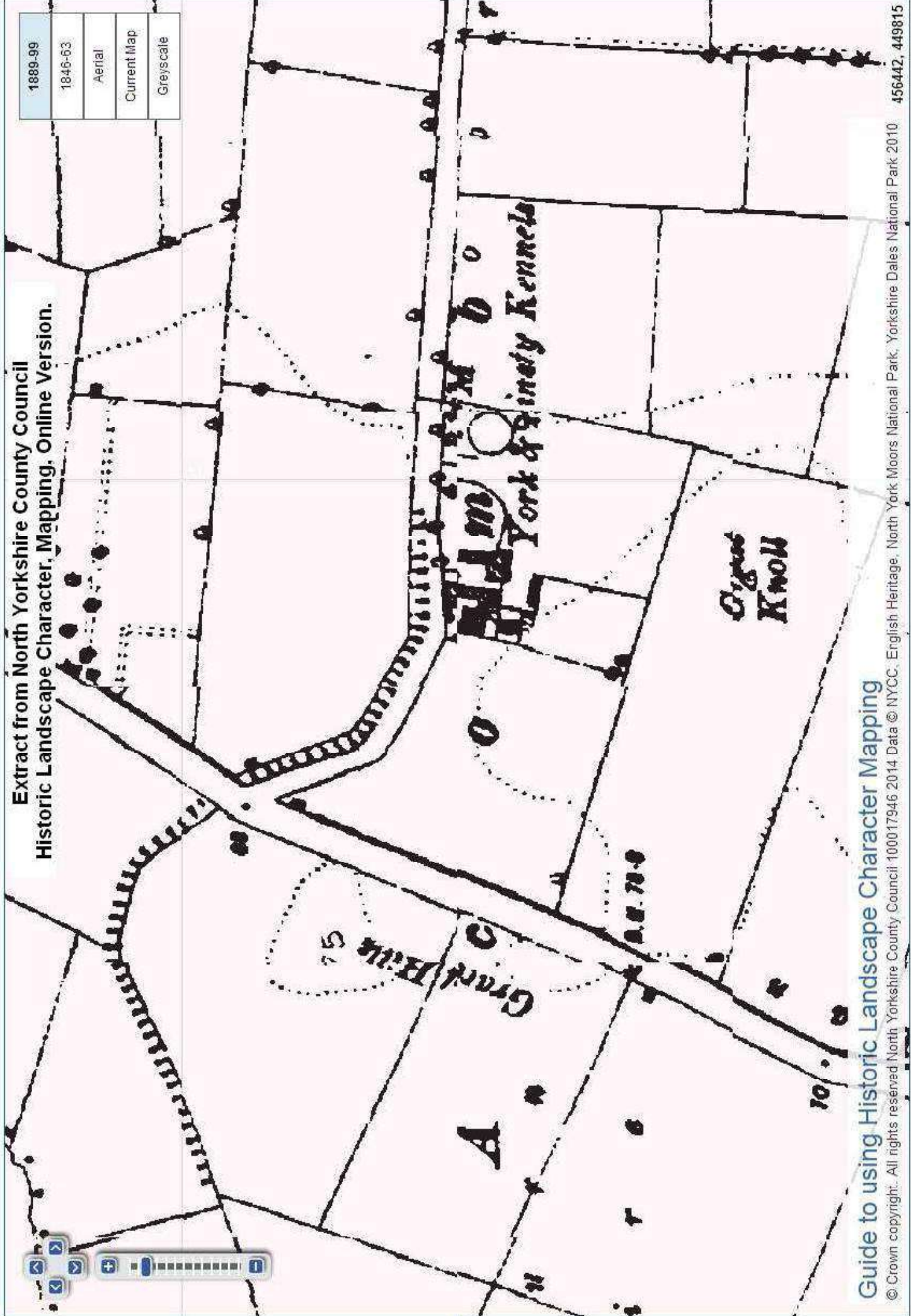
Map produced by MAGIC on 12 July, 2014.
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 information in MAGIC is a synthesis of the information
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 originating organisations. Please refer to the metadata for
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 rather than definitive at this stage.

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 Ashtam Bryan, North Yorkshire



Extract from North Yorkshire County Council
Historic Landscape Character, Mapping, Online Version.

1889-99
1846-63
Aerial
Current Map
Greyscale



- Landscape character types
- 1 Urban Landscapes
- 2 Sandstone Moors
- 3 Sandstone Moors Foothills
- 4 Limestone Foothills and Valleys
- 5 Limestone Ridge
- 6 Magnesian Limestone Ridge
- 7 Yoredale Moors and Fells
- 8 Limestone Moors Scar
- 9 Farmed Dale
- 10 Narrow Upland Dale
- 11 Broad Valleys
- 12 Wooded Hills and Valleys
- 13 Moors Fringe
- 14 Rolling Upland Farmland
- 15 Rugged Cliffs Coastal Valleys and Bays
- 16 Soft Coastal Cliffs and Bays
- 17 Chalk Headland
- 18 Chalk Wolds
- 19 Chalk Foothills
- 20 Broad Chalk Valley
- 21 Narrow Chalk Valley
- 22 Open Carr Vale Farmland
- 23 Levels Farmland
- 24 River Floodplain
- 25 Settled Vale Farmland
- 26 Enclosed Vale Farmland
- 27 Vale Farmland with Dispersed Settlements
- 28 Vale Farmland with Plantation Woodland and Heathland
- 29 Undulating Lowland Farmland
- 30 Sand and Gravel Vale Fringe
- 31 Settled Industrial Valleys
- 32 Drumlins
- 33 Gritstone High Plateau
- 34 Gritstone High Moors and Fells

Extract from North Yorkshire County Council Landscape Character Assessment, Online Version.

Aerial
Map
Greyscale

28

28 Vale Farmland with Plantation Woodland and Heathland

(28) Vale Farmland with Plantation Woodland and Heathland

Primary Landscape Units

(G) Farmed Lowland and Valley Landscapes [Information](#) [click to open](#)

National Character Areas

(28) Vale of York [Information](#) [click to open](#)

For information, tick a map category and click on the relevant object

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458476, 451259



Executive**25 January 2018**

Report of the Assistant Director, Planning and Public Protection

Portfolio of the Executive Leader (incorporating Finance & Performance) and Deputy Leader

City of York Local Plan**Summary**

1. This purpose of the report is:
 - (i) To provide a background summary of the previous iterations of draft policies and the circumstances which led to the rationale of the Executive decision to approve the Pre-Publication Draft Local Plan for consultation;
 - (ii) To provide a summary of the present national policy and legislative context, including the “soundness” requirement and potential for Government intervention;
 - (iii) To report responses to the Autumn 2017 Pre Publication Draft Local Plan Consultation;
 - (iv) To provide Officers’ advice regarding appropriate responses to the Consultation outcomes; and
 - (v) To seek Member approval of the next steps in the York Local Plan making process.

These issues were considered at Local Plan Working on 23rd January 2018 and the minutes will be circulated to Executive.

Recommendations

2. Members are asked to:

- (i) Consider any potential changes to the pre publication draft Local Plan (Regulation 18) based on the information included within this report and associated annexes and confirm the basis on which the Local Plan should be progressed to the Regulation 19 stage including a city wide consultation.

Reason: So that an NPPF compliant Local Plan can be progressed.

- (ii) Following decisions on the matters referred to in (i) above authority be delegated to the Assistant Director of Planning and Public Protection in consultation with the Leader and Deputy Leader to approve all policies necessary for the production of a composite Local Plan for the purposes of public consultation.

The Leader and Deputy Leader to keep Group Leaders informed through Group Leaders meetings.

Reason: So that an NPPF compliant Local Plan can be progressed

- (iii) Delegate to the Assistant Director of Planning and Public Protection in consultation with the Leader and Deputy Leader the consideration and approval of further technical reports and assessments to support the Local Plan including, but not limited to the SA/ SEA, HRA, Viability Study and Transport Assessment.

The Leader and Deputy Leader to keep Group Leaders informed through Group Leaders meetings.

Reason: So that an NPPF compliant Local Plan can be progressed.

- (iv) Delegate authority to the Assistant Director of Planning and Public Protection in consultation with the Leader and Deputy Leader to approve a consultation strategy and associated material for the purposes of a city wide consultation and to undertake consultation on a composite plan in accordance with that agreed strategy.

The Leader and Deputy Leader to keep Group Leaders informed through Group Leaders meetings.

Reason: So that an NPPF compliant Local Plan can be progressed.

Background

3. Officers produced a publication draft Local Plan in Autumn 2014. This process, however, was halted by Council resolution on the 9th October 2014. Following the Local Government Elections in May 2015 the agreement between the Conservative and Liberal Democrat Groups, to establish a joint administration for City of York Council from May 21st 2015 states that:

'We will prepare an evidence-based Local Plan which delivers much needed housing whilst focusing development on brownfield land and taking all practical steps to protect the Green Belt and the character of York.'

4. In 2016 a Preferred Sites Consultation was undertaken. It began on 18th July 2016 and ended on 12th September 2016. 1,766 individual responses were received from members of the public, developers and statutory consultees. After the Preferred Sites Consultation concluded the Ministry of Defence (MOD) announced as part of its Defence Estate Strategy on 7th November 2016 the release of three substantial sites in York:

- Imphal Barracks, Fulford Road;
- Queen Elizabeth Barracks, Strensall; and
- Towthorpe Lines, Strensall.

Technical work was carried out which established that the sites represented 'reasonable alternatives' and, therefore, should be considered as part of the Local Plan process.

5. At the Executive in July 2017 Officers sought approval to undertake a full consultation on a Pre publication draft Local Plan (Reg 18). To support this process the report included a Strategic Housing Market Assessment (SHMA) which made a recommendation on the level of housing growth

for York, an Employment Land Review (ELR) and a series of sites to meet the related arising demand. It also included recommendations on non sites related policies.

6. The Local Plan Preferred Sites Consultation (2016) included an annual housing figure of 841 dwellings pa. The SHMA produced by GL Hearn suggested increasing this figure to 867 dwelling and including an uplift of 10% to the baseline household projections for York to allow for market signals (lifting it to 953 dwellings per annum). Members accepted the higher baseline figure, but not the 10% uplift on the basis that the figure of 867 dwelling represented a significant step change in past delivery. They considered Hearn's conclusions were speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attached little or no weight to the special character and setting of York and other environmental considerations. The employment land requirements included in the ELR were agreed.
7. A city-wide consultation on the Local Plan Pre Publication Draft (Reg 18) commenced on the 18th September 2017 and finished on 30th October 2017. It was carried out in compliance with the Council's adopted Statement of Community Involvement (2007). The consultation included contacting individuals and organizations on the Local Plan database, public exhibitions, meetings, a special edition of 'OurCity', and information provided via conventional and social media.

National Policy Context

8. On 7th February 2017, the Department for Communities and Local Government (DCLG) published a Housing White Paper. As part of which, DCLG also consulted on changes to planning policy and legislation in relation to planning for housing, sustainable development and the environment. It is anticipated that the outcomes of the consultation will involve amendments to the National Planning Policy Framework (NPPF) and regulations. This is likely to be before the end of Summer 2018.
9. Following on from the White Paper on 14th September 2017 the Department for Communities and Local Government (DCLG) released 'Planning for the right homes in the right places: consultation proposals'.

These focused on streamlining the planning system and were primarily concerned with how local housing need is assessed. The consultation ran for eight weeks and closed on 9th November 2017. The Government indicated that after reviewing the responses to this consultation along with responses to the Housing White Paper it would publish a draft revised National Planning Policy Framework (NPPF) in 2018.

10. The DCLG November 2017 consultation included a proposed methodology for calculating housing need. This is based on three principles: simplicity, using publicly available data and producing realistic targets. The document applies this methodology to City of York and indicated a minimum of 1,070 dwellings p/a for the period 2016 to 2026. It should be noted that this methodology was the subject of consultation and formal changes to the NPPF have not yet been incorporated by the Government.
11. In addition, it should be noted that the figure of 1070 dwellings is based on 2014 sub-national population projections (released in 2016) which are due to be replaced with the 2016 sub-national population data in May 2018. The National Population Projections released in October 2017 (on which the 2016 sub-national population figures will be based) suggest slower growth than the previous (2014-based) projections. This is because of lower assumptions about future levels of fertility and international migration, and an assumption of a slower rate of increase in life expectancy.
12. A key change is that the proposed methodology put forward by DCLG is forward looking; conversely the current target included in the Pre-publication Local Plan involved considering under delivery from 2012 – 2017 and meeting this by adding to the future supply.
13. The consultation on the proposed new methodology made explicit reference to protecting Green Belt and acknowledged it as a constraint. It also highlights the extent of York's Green Belt. It is not however completely clear about the effects of this constraint and how it would effect York in setting Green Belt Boundaries for the first time.
14. It is proposed by DCLG that in the absence of an up-to-date local strategic plan that after 31st March 2018 the new method for calculating

housing need would be adopted. However, should the revised national planning policy framework be published after this date, subject to the outcomes of consultation, it will be introduced at that later date. Given the Government haven't yet responded to this consultation and the potential timeframe for the publication of the revision to NPPF the 31st March adoption date seems unlikely. For the purposes of this report we will continue to use the methodology reported to Members in July 2017.

15. The National Population Projections were published by the Office for National Statistics on 26th October 2017. We anticipate that the Sub-National Population Projections will be released in May 2018 in accordance with previous releases. The Sub-National Household projections to be released by the DCLG, which use the population ONS data, are likely to follow in July/August 2018. This reflects the nature of changing data sets that surround the plan making process.
16. On 16th November 2017 the Secretary of State for Communities and Local Government wrote to the Council. The letter emphasised the importance of up-to date local plans. He then expressed concern about the lack of progress City of York has made on plan-making. The last adopted detailed plan for the city was produced in 1956. The Council is asked to respond by 31st January 2018.
17. The Council is currently preparing a response to the Secretary of State emphasising the importance of responding through the Local Plan process to the release of the MOD sites in November 2016 and including a commitment to submit at the end of May 2018.

Local Plan Pre Publication Draft Consultation Response

18. During the autumn 2017 consultation period we have received responses from circa 1,295 individuals, organisation or interest groups. In response to the Preferred Sites Consultation (2016) held in July - September 2016, we received 1766 responses from individuals and organisations.
19. In conjunction with this report all representations received will be published on line via the Council's website and will be available both electronically and in hard copy at West Offices reception. Those

representations received from members of the public will have personal information redacted to comply with the Data Protection Act 1998.

20. The representations received as a part of the consultation raise a range of issues some of which are complex in nature. These are provided in summary in Annex A to this report along with potential changes for Members' consideration.
21. Given the historical and national policy context associated with the development of the City of York Local Plan Members' attention is particularly drawn to the following key issues :
 - Housing Need and Land Supply; and
 - Employment Land Supply.

Housing Need and Land Supply

22. The historical approach taken to housing need and the related changing national policy context is detailed above. In addition comments received during consultation on this matter are included in Annex A and provided in summary below.
 - Support was received for the principle of council meeting their entire objectively assessment housing need (OAHN).
 - Some parish representations supported the 867 dwellings per annum figure particularly in comparison to the Government's proposed standardised methodology.
 - In respect of housing numbers responses, particularly planning agents and developers, objected to using 867 dwellings per annum; the reasons for this included: the failure to comply with the Strategic Housing Market Assessment (2017) and the lack of conformity with both existing and emerging national policy.
 - Some respondents objected to the approach taken to backlog, student housing and windfalls.
 - The majority of responses from the public were in objection to proposed sites.

23. It is important to recognise that the proposed methodology included in the document produced by DCLG was for the purposes of consultation and may be subject to change (although at present it indicates the direction of travel anticipated for national policy). The methodology differs from that applied by the Council in reaching the housing need figures, and thus cannot be compared without further analysis. The reasons for this are outlined below.
24. As previously highlighted the Government's proposed methodology is forward looking and unlike the Council's methodology, does not add in any additional amounts for previously unmet demand. The City of York Local Plan has an effective start date of the 1st April 2012 in terms of population and housing. This is to fit with the position taken by Government in terms of their demographic projections. Using the Council's methodology, any under delivery against the housing target between 2012 – 2017 is accommodated over the life time of the plan.
25. In July the Executive agreed a figure of 867 dwellings per annum for the duration of the City of York Local Plan and Green Belt (until 2033 and 2038 respectively). As the Council's methodology includes provision to meet previous under supply within the 2012 to 2017 period, this means the plan as produced for the autumn 2017 consultation includes a sufficient overall supply to meet both these requirement.
26. Members must be satisfied that they consider the Submission Draft Plan meets the test of "soundness". This is a statutory duty. Officer's advice is that the direction of travel in national policy indicates that if the site proposals previously consulted on were increased this would be a more robust position. However, this is not to say that the proposals previously consulted on would be unreasonable; It is a matter for Members to determine the degree of risk they wish to take.
27. In Officer's opinion, an increase in the supply of housing would place the Council in a better position for defending the Plan proposals through the Examination process. However, Members will be aware of the counter arguments in particular the community responses to consultation. In addition in potentially increasing supply Members will also be mindful of

the time required for achieving this more robust position in line with legislative requirements. An important issue to consider is whether changes can be made to the plan without undertaking additional consultation. This is a critical issue if the Council is to meet the May 2018 deadline for submission.

28. In response to developer proposals submitted during the Pre Publication Draft Local Plan Consultation (details of which are included in Annex A), potential options for increasing the housing supply are set out in tables 1 to 4 below along with the potential risk in terms of the need for additional consultation. The table also highlights a small reduction on the Queen Elizabeth Barracks Site. This reflects outcomes from the Habitats Regulation Assessment.

Table 1: Potential changes to housing sites allocated in the Pre Publication Draft Local Plan in response to developer proposals (With minor or no boundary changes)

Allocation Reference	Site Name	No. Included in PPLP	Potential Revised Figure
ST5	York Central	1500	1700 - 2500
ST35	Queen Elizabeth Barracks, Strensall	578	500

29. Following consultation discussions have been held with representatives from the York Central Partnership. This has indicated that York Central is capable of accommodating between 1700 – 2400 residential units and that the higher figure of 2500 units could be achieved through detailed applications by developers for individual plots and / or flexibility to increase residential at the margins of the commercial core. The figure of 1700 reflects land currently under the partnerships control; the higher figure includes land in private ownership or currently used for rail operations.
30. The higher number is proposed to be part of the partnerships planning application anticipated in summer 2018.

Table 2: Potential changes to housing sites allocated in the Pre Publication Draft Local Plan in response to developer proposals (With boundary changes)

Allocation Reference	Site Name	No. Included in PPLP	Potential Revised Figure
ST 7	Land East of Metcalfe Lane	845	975
ST 14	Land West of Wiggington Road	1348	1,672
ST 15	Land West of Elvington Lane	3,339	3,901

31. Table 1 & 2 relates to increasing the capacity and extending existing site allocations. It is a matter of judgment as to whether the changes to the existing sites are “material”. However, in the context of the large strategic allocations, it is considered arguable by your officers that the additional land is not a material change. However, this is a matter of judgment, and there is a residual risk that the Examiner will take a different view and require the Council to undertake further consultation on this issue following submission.

Table 3: Potential new housing site allocations , in response to developer proposals (previously rejected housing sites)

Site Reference	Site Name	Potential Revised Figure
H28	Land North of North Lane, Wheldrake	88 dwellings / 3.15 ha
H2b (132)	Land at Cherry Lane	18 dwellings / 0.44 ha
H37 (6)	Land at Greystone Court Haxby	34 dwellings / 3.47 ha
SF10 (874)	Land North of Riverside Gardens Elvington	102 dwellings / 4.15 ha
H2a (33)	Racecourse stables off Tadcaster Road	98 dwellings / 2.44 ha (years 16-21)
964	Galtres Farm	1575 dwellings / 75 ha (years 16-21)

32. Table 3 includes sites that have in the past been assessed against the site selection criteria and rejected, but now given further work Officers feel should be considered. These could potentially be included in the Publication Draft without the need for a further additional consultation, as they have already been the subject of public scrutiny through previously published Local Plan evidence or SA/ SEA. There is however

a higher risk than tables 1 & 2 that the Examiner may find further consultation is needed.

Table 4: Potential completely new housing site allocations in response to developer proposals

Site Reference	Site Name	No. Included in PPLP	Potential Revised Figure
956	Milestone Avenue, Rufforth	n/a	9 dwellings / 0.37 ha
959	Land at Kettlestring Lane, Clifton Moor	n/a	92 dwellings / 3.2 ha (years 16-21)

33. Table 4 includes new sites that have emerged during the Autumn 2017 Consultation. Although they do meet the requirements of the site selection methodology and therefore potentially represent reasonable alternative, they have not been included in any previous consultation. If any of these sites were to be included in the next stage of the Local Plan the lack of consultation creates a risk to process and the Examiner could require further consultation before the Examination could proceed. Carrying out further consultation now about proposing to include these new sites would mean that the May 2018 date for submission could not be met.

Employment Land Supply

34. The Employment Land Review (ELR) July 2016 published as part of the Preferred Sites Consultation used projections by Oxford Economics (OE) dated May 2015 as the forecast for employment land demand over the Local Plan period. These forecasts provided the starting point for determining the amount and type of employment land required to be identified in the Plan. The projections by Oxford Economics presented a baseline scenario for York forecasting a job growth of 10,500 jobs over the period 2014-2031. Two further scenarios were considered by OE; scenario 1 – higher migration and faster UK recovery, which identified an additional 4,900 jobs above the baseline over the same period and scenario 2 – re-profiled sector growth which identified 500 additional jobs above the baseline. Scenario 2 was endorsed as it reflected the economic policy priorities of the Council to drive up the skills of the workforce and encourage growth in businesses which use higher skilled staff.

35. To sensitivity test the original 2015 OE projections, the latest Experian economic forecasts within the Regional Econometric Model (REM) were used. The conclusion was that the original forecasts were still robust. At the Executive in July 2017 Members endorsed this position.

36. During the consultation a range of points were raised. These are provided in summary below:

- general support for the Local Plan as positively and proactively encourage sustainable economic growth, including tourism and leisure;
- the approach to focusing retail development in the City Centre and reducing / limiting future development at out of town locations was also supported;
- some representations recognised the uncertainties inherent in long term economic forecasting and therefore suggested that the using the baseline forecast to inform the employment land requirements of the Plan was over cautious;
- it was also suggested that housing and employment policies are restrictive and the employment land supply will not cater for York's future needs;
- the cost of housing impinging on companies and public services abilities to recruit staff was raised;
- a perceived conflict was highlighted relating to acknowledging the universities importance for growth but failure to allocate land for expansion; and
- a few members of the public were opposed to, or questioned, economic growth as a goal in of itself saying it is incompatible with sustainability.

37. Given comments made about economic growth Members may wish to consider increasing the employment land supply. The sites included in tables 5, 6 and 7 provided potential options. As with housing supply above it is important that this is balanced against whether changes can be made to the plan without undertaking additional consultation, a critical issue if the Council is to meet the May 2018 deadline for submission.

Table 5: Potential changes to employment sites allocated in the Pre Publication Draft Local Plan in response to developer proposals (With minor or no boundary changes)

Allocation Reference	Site Name	No. Included in PPLP	Potential Revised Figure
ST5	York Central	60,000 sqm	100,000 sqm

Table 6: Potential changes to employment sites allocated in the Pre Publication Draft Local Plan in response to developer proposals (With boundary changes)

Allocation Reference	Site Name	No. Included in PPLP	Potential Revised Figure
ST27	University of York expansion	21.5ha	26ha
ST26	Elvington Airfield Business Park	10 ha/	15 ha / 33,000sqm

38. Table 5 and 6 relates to increasing the capacity and extending existing site allocations. It is a matter of judgment as to whether the changes to the existing sites are “material”. In the context of the large strategic allocations, it is considered arguable by your officers that the additional land is not a material change. However, this is a matter of judgment, and there is a residual risk that the Examiner will take a different view and require the Council to undertake further consultation on this issue following submission.

Table 7: Potential new employment site allocations , in response to developer proposals (previously rejected employment sites)

Site Reference	Site Name	Potential Revised Figure
795	Greenacres Murton Lane	1.95ha / 6,000 sqm
864	Extention to Elvington Industrial Estate	5.4ha / 17,820 sqm
940	Remaining Land at Bull Commercial Centre	3ha/ 10,000 sqm

39. Table 7 includes sites that have in the past been assessed against the site selection criteria and rejected, but now given further work Officers

feel should be considered. These could potentially be included in the Publication Draft without the need for a further additional consultation, as they have already been the subject of public scrutiny through previously published Local Plan evidence or SA/ SEA. There is however a higher risk than tables 5 & 6 that the Examiner may find further consultation is needed.

Transport Assessment

40. To support the Local Plan Pre Publication Draft (Reg 18) Consultation, future year forecasting of the transport impacts of potential residential and employment allocations together with the inclusion of a number of infrastructure improvements that can realistically be expected to be put in place within the Plan period was undertaken. This is contained in the Transport Topic paper, 2017. This is important background to any further decision on sites.
41. The main outcome of this forecasting shows that from 2016 to 2032/33 on the network as a whole:
 - Total trips increase by approximately 20%
 - Total travel time increases by approximately 30%
 - Total delay increases by approximately 55%
42. More detailed mapping of the forecast changes in traffic volume, traffic speeds and changes in traffic speed from the baseline year (2016) to the end of the plan period (2032/33) show that the main parts of the network to be impacted on are:
 - The A64
 - A1237 Clifton Moor to A64 Hopgrove
 - A59/A1237 Roundabout /A59 / Wetherby Road
 - Malton Road
 - A19 / Fulford Road
 - Hull Road
 - Tadcaster Road
43. Although the more detailed mapping referred to in the preceding paragraph shows the changes in traffic volumes and vehicle speeds across the network they may not necessarily give the information that would be of direct relevance to road users undertaking journeys into, around, or through York. To provide a more relevant indication of how a

typical journey will be affected in the future year the changes on travel time on the fifteen routes that could be deemed to be representative of 'typical' trips on the network are shown in Table 8.

Table 8 Comparison of future year modelled travel times with baseline year travel times

Trip		2016 Base year modelled peak hour trip time (min : sec)		Future Year (2032/33) Forecast					
				Modelled peak hour trip time (min : sec)		Increase from baseline year (min : sec)		Percentage increase in time from Baseline year	
Route No.	Description	AM	PM	AM	PM	AM	PM	AM	PM
1	A1237 (Northbound)	26:38	34:46	28:03	32:34	01:25	-02:12	5.3	-6.3
	A1237 (Southbound)	26:28	25:55	28:26	28:34	01:58	02:39	7.4	10.2
2	A64 (Northbound)	14:05	14:06	16:06	16:06	02:01	02:00	14.3	14.2
	A64 (Southbound)	14:07	14:47	15:42	17:15	01:35	02:28	11.2	16.7
3	Inner Ring Road (Clockwise)	22:15	25:48	24:11	27:39	01:56	01:51	8.7	7.2
	Inner Ring Road (Anti-clockwise)	19:03	21:38	20:40	23:27	01:37	01:49	8.5	8.4
	A1036 Tadcaster Road (Inbound)	12:55	12:32	13:24	12:40	00:29	00:08	3.7	1.1
	A1036 Tadcaster Road (Outbound)	11:24	10:27	11:54	11:08	00:30	00:41	4.4	6.5
5	A19 Fulford Road (Inbound)	15:46	14:18	19:31	18:49	03:45	04:31	23.8	31.6
	A19 Fulford Road (Outbound)	13:25	23:16	14:16	24:22	00:51	01:06	6.3	4.7
6	A1079 Hull Road (Inbound)	17:46	15:17	19:40	16:59	01:54	01:42	10.7	11.1
	A1079 Hull Road (Outbound)	12:11	14:47	12:37	18:18	00:26	03:31	3.6	23.8
7	A1036 Malton Road (Inbound)	07:40	08:12	08:04	9:04	00:24	00:52	5.2	10.6
	A1036 Malton Road (Outbound)	07:21	07:29	07:30	7:49	00:09	00:20	2.0	4.5
8	B1363 Wigginton Road (Inbound)	14:08	13:35	13:56	15:05	-00:12	01:30	-1.4	11.0
	B1363 Wigginton Road (Outbound)	13:59	13:34	13:40	20:39	-00:19	07:05	-2.3	52.2
9	A19 Shipton Road (Inbound)	14:23	09:57	12:30	09:55	-01:53	-00:02	-13.1	-0.3
	A19 Shipton Road (Outbound)	10:49	09:19	09:54	09:02	00:55	-00:17	8.5	-3.0
10	A59 Boroughbridge Road (Inbound)	18:10	17:13	18:19	18:39	00:09	01:26	0.8	8.3
	A59 Boroughbridge Road (Outbound)	15:50	19:20	17:16	19:58	01:26	00:38	9.1	3.3
11	B1224 Wetherby Road (Inbound)	08:07	08:09	08:35	08:31	00:28	00:22	5.7	4.5
	B1224 Wetherby Road (Outbound)	07:53	07:53	08:03	08:12	00:10	00:19	2.1	4.0
	Haxby Road (Inbound)	15:24	11:29	14:45	12:13	-00:39	00:44	-4.2	6.4
	Haxby Road (Outbound)	11:18	11:41	11:21	14:23	00:03	02:42	0.4	23.1
13	Water End (to northeast)	05:12	03:26	05:13	03:37	00:01	00:11	0.3	5.3
	Water End (to southwest)	03:38	03:40	03:35	03:37	-00:03	-00:03	-1.4	-1.4
14	Leeman Road (Inbound)	05:11	03:38	05:11	03:37	00:00	-00:01	0.0	-0.5
	Leeman Road (Outbound)	03:25	05:41	03:25	05:40	00:00	-00:01	0.0	-0.3
15	Bishopthorpe Road (Inbound)	09:52	08:38	09:53	08:40	00:01	00:02	0.2	0.4
	Bishopthorpe Road (Outbound)	08:34	08:42	08:40	09:08	00:06	00:26	1.2	5.0

44. If the housing supply for the Publication Draft Plan is increased from that in the Pre Publication Draft Local Plan it is likely that the transport impacts will be exacerbated. For example, if the level of growth is increased by the order of 10% it can reasonably be assumed that the impacts will increase by a similar scale. More detailed modelling will have to be undertaken to support the regulation 19 consultation.

Viability

45. Ensuring sites are viable and deliverable in the context of planning policy is a requirement of national guidance. Thus, 'The City of York Local Plan and Community Infrastructure Levy Viability Assessment, 2017', was undertaken and issued for consultation alongside the Local Plan Pre-Publication Draft (Regulation 18).
46. For residential development policy testing was undertaken for each typology and strategic site. The policy testing comprised testing a series of policy layers. For each policy layer, the impact of those policy considered to have a notable impact on viability is then considered through adding policy 'layers' to judge the cumulative impact of these policies. These are:
- Policy layer 1 – This is a base layer, which includes open space and design cost allowances but no policy layer applied;
 - Policy layer 2 – This layer adds a S106 contribution at £3,300 per unit to the Policy layer 1;
 - Policy layer 3 – Policy layer 2 plus the policy requirement for affordable housing (Policy H10)
 - Policy layer 4 – Policy layer 3 plus the requirement for meeting sustainable construction standards (Policy CC2)
 - Policy layer 5 – Policy layer 4 plus an allowance for Gypsy and Traveller pitches where required (Policy H5).
47. The Viability testing for residential development shows that there is viability across all residential site typologies with the imposition of the average S106 contributions (i.e. policy layer 2). But at cumulative policy layer 3, when affordable housing is also applied, some of the smaller sites (delivering less than 10 units) are unable to meet the full policy requirements beyond the average S106 contribution per unit. All the

other tested typologies, including all sites within the urban area and all sites with 10 or more units in all locations (including the bespoke-tested Strategic Sites), are shown to be able to fully meet the Pre Publication Draft Local Plan Policy requirements (i.e. at cumulative policy layer 5).

48. Overall, for residential development the viability testing results imply that the cumulative policy requirements identified in the Pre Publication Draft Local Plan (2017) do not adversely affect the majority of development in most parts of the City of York area. The recommendations included within Annex A seek to address the outcomes of this work.
49. It should be noted however that allowing an increase in site size could in some cases allow the delivery of an increased level of planning gain relating to facilities and services for future residents.
50. For Non- residential development two policy layers were tested:
 - Policy layer 1 – This is a base layer, where no policies are applied; and
 - Policy layer 2 – This layer includes the requirement for achieving a BREEAM 'excellent' delivery in line with Policy CC2: Sustainable Design and Construction.
51. The viability assessment determined that all non-residential uses are unable to show viability with or without meeting proposed policy CC2 Sustainable Design and Construction with the exception of retail. However, the viability of non-residential uses is not necessary for supporting such allocations in the Local Plan, principally because non-residential development is generally more speculative than residential .

Sustainability Appraisal

52. When producing Local Plans, authorities are required to consider, at each stage of production, the impacts their proposals are likely to have on sustainable development. The emerging Local Plan is subject to ongoing Sustainability Appraisal incorporating the requirements of Strategic Environmental Assessment (SA/SEA) as required through NPPF. SA/SEA is a means of ensuring that the likely social, economic

and environmental effects of the Local Plan are identified, described and appraised to identify how they support the Council's sustainable development objectives.

53. At the Pre publication stage of the Local Plan a SA/SEA was undertaken. 'The Sustainability Appraisal Summary 2017' is a detailed technical document; and is an important background paper to this report to inform Members decisions. It has also been used to inform the recommendations in Annex A and will be updated following Members decisions on this report. It will be made available as a part of the Local Plan Publication (Reg 19) consultation.

Duty to Cooperate

54. The Localism Act 2011 introduced the Duty to co-operate (the Duty) that requires local planning authorities and other prescribed bodies to 'engage constructively, actively and on an on-going basis' to maximise the effectiveness of local plan preparation in relation to strategic matters.
55. The Act also extended the purposes of the plans Examination to include determination as to whether the Duty has been complied with. National Planning Practice Guidance makes it clear that Inspectors testing compliance with the duty at examination will assess the outcomes of co-operation rather than the process of dialogue. Failure to demonstrate compliance with the duty at the examination cannot be corrected after the local plan has been submitted for examination.
56. As it has developed the Local Plan has been subject to on-going and constructive engagement with neighbouring authorities and relevant organisations. This has included:
- the preparation and updating of a Duty to Cooperate Matrix (that has been generally circulated to the officer level groups for subsequent discussion and comment);
 - regular one-to-one officer meetings;
 - making representations, as appropriate, to other authorities Local Plan documents, and vice versa; and
 - regular technical discussions at regional sub-regional Member and officer groups.

57. Through the meetings highlighted Officers have sought to gauge the appetite of neighbouring authorities for a sub-regional approach to delivering housing within the context of the Duty to Cooperate. Whilst this wasn't supported for the current round of Local Plans there may be some support to consider this in the future.
58. Details on how the Council has fulfilled the requirements under the Duty was contained in the 'Demonstrating the Duty to co-operate (Interim Statement)' that is part of the supporting evidence base for the Pre Publication Draft Local Plan.
59. Several Prescribed Bodies including many of York's neighbouring authorities, the Local Enterprise Partnerships and Highways England returned representations during the Pre Publication Draft Local Plan consultation. These have been considered in coming to the recommendations included in Annex A. In addition they are summarised in Annex B to inform Members consideration of the recommendation associated with this report. The comments provided are broadly supportive of ongoing engagement and alignment with economic objectives, but stress the importance of an appropriate land supply for housing and the need for joint working on issues such as transport.
60. Post consultation reports on the City of York Local Plan have been considered at the following meetings:
 - Leeds City Region - Heads of Planning – 8th December 2017;
 - Leeds City Region Planning Portfolios Board 15th December 2017;
 - York, North Yorkshire East Riding and Hull - Directors of Development – 07th December 2017; and
 - North Yorkshire and York Spatial Planning and Transport Board 17th January 2018.

Options

61. Officers request that Members consider the following options to enable a composite Local Plan Publication (Regulation 19) document to be produced for statutory soundness consultation prior to submission:

Option 1: *The additions of further housing sites from tables 1 – 4;*

Option 2: *The additions of further employment sites from tables 5 – 7;
and*

Option 3: The proposed policy changes highlighted in Annex A.

Analysis of Options

62. Members are being asked to consider amendments to the plan previously consulted upon and approve a Publication Draft Local Plan which ultimately will be subject to examination by a member of the Planning Inspectorate. They must therefore, when considering the options above, be aware of the procedures which the Council is required to follow when producing a Local Plan. These are derived from the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Development) (England) Regulations 2012. The legislation states that a local planning authority must only submit a plan for examination which it considers to be sound. This is defined by the National Planning Policy Framework as being:

- **Positively Prepared:** based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
- **Justified:** the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective:** deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy:** enable the delivery of sustainable development in accordance with the policies in the Framework.

63. Members must consider whether in light of the consultation responses and changes in the national policy context the proposed Publication Draft Local Plan meets the above tests and is 'sound'. This includes the approach to both housing and employment need and supply.

Next Steps

64. Following the Executive, if Members agree, Officers will produce a composite draft Plan and a city-wide proposals map. In addition this

document will be accompanied by a range of technical documents which will need to be prepared after the Executive. These will include (but not be limited to):

- SA/SEA;
- Habitat Regulation Assessment (HRA);
- City-wide transport model;
- Viability Assessment;
- Strategic Housing Land Availability Assessment (SHLAA);
- Any technical addendums necessary arising from the recommendations of this report relating to growth and sites.

65. Following the Regulation 19 consultation, Officers will report the responses received to Local Plan Working Group, Executive and Council seeking approval to submit a plan for public examination before the end of May 2018. Legislation requires that Full Council, having had regard to any consultation responses, determines whether the plan is 'Sound' to enable submission for independent examination under Regulation 20. The timetable highlighted is in conformity with the Council's published Local Development Scheme (LDS).
66. Officers will continue to seek dialogue with key partners including neighbouring authorities, the County Council and both LEPs. In addition dialogue will also be sought with both DCLG and the Planning Inspectorate.

Impacts

67. **Financial (1)** – The work on the Local Plan is funded from specific budgets set aside for that purpose. Over the last four years, significant sums have been expended on achieving a robust evidence base, carrying out consultations, sustainability and other appraisals, policy development and financial analyses. Whilst this work remains of great value it is important that progress is made to ensure that unnecessary additional costs do not occur.
68. **Financial (2)** - It should also be considered that if the approach taken is subsequently judged to be non compliant with Government Guidance either before or after submission this could lead to further technical work

and additional consultation adding to the identified costs and creating delay.

69. **Financial (3)** - Managing the planning process in the absence of a Plan will lead to significant costs to the council in managing appeals and examinations.
70. **Human Resources (HR)** – The production of a Local Plan and associated evidence base requires the continued implementation of a comprehensive work programme that will predominantly, although not exclusively, need to be resourced within EAP.
71. **Better Decision Making Tool** – Attached as annex C.
72. **Legal** – The procedures which the Council is required to follow when producing a Local Plan derive from the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Development) (England) Regulations 2012.
73. The legislation states that a local planning authority must only submit a plan for examination which it considers to be sound. This is defined by the National Planning Policy Framework as being:
 - **Positively Prepared:** based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
 - **Justified:** the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective:** deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy:** enable the delivery of sustainable development in accordance with the policies in the Framework.
74. In order for the draft Local Plan to pass the tests of soundness, in particular the 'justified' and 'effective' tests, it is necessary for it to be based on an adequate, up to date and relevant evidence base. The Council also has a legal duty to comply with the Statement of Community Involvement in preparing the Plan. (S19(3) 2004 Act).
75. In addition the Council also has a legal "Duty to Co-operate" in preparing the Plan. (S33A 2004 Act).

76. In due course Council will be asked to approve the publication draft Local Plan for submission to the Secretary of State. It will then be subject to examination by a member of the Planning Inspectorate before being finally adopted. If the draft Local Plan is not prepared in accordance with legal requirements, fully justified and supported by evidence, the draft Local Plan is likely to be found unsound at examination and would not be able to proceed to adoption.
77. **Crime and Disorder** – The Plan addresses where applicable.
78. **Information Technology (IT)** – The Plan promotes where applicable.
79. **Property** – The Plan includes land within Council ownership.
80. **Other** – None

Risks

81. The main risks in failing to progress a Local Plan for the City of York in compliance with laws, regulations and guidance are as follows:
- the plan is found ‘unsound’ at examination leading to ‘withdrawal’ or further work;
 - direct interventions by Government into the City’s Local Plan making;
 - inability to steer, promote or restrict development across its administrative area;
 - potential damage to the Council’s image and reputation if a development plan is not adopted in an appropriate timeframe; and
 - financial risk associated with the Council’s ability to utilise planning gain and deliver strategic infrastructure.

Measured in terms of impact and likelihood, the risks associated with this report have been assessed as requiring frequent monitoring.

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Cllrs D Carr & A Waller

**Report
Approved**



Date 15/01/18

Specialist Implications Officer(s):

Finance Manager
Senior Solicitor, Planning

Wards Affected:

All

Annexes

Annexe A: Pre Publication Draft Local Plan (2017) Consultation
Response Summaries & Recommendations

Annex B: Duty to Cooperate Responses

Annex C: Better Decision Making Tool

Background Papers

Transport Topic paper, 2017.

https://www.york.gov.uk/downloads/file/14278/transport_topic_paper_2017

The City of York Local Plan and Community Infrastructure Levy Viability
Assessment, 2017.

https://www.york.gov.uk/downloads/file/14273/local_plan_and_community_infrastructure_levy_viability_assessment_2017

The Sustainability Appraisal Summary, 2017.

https://www.york.gov.uk/downloads/file/14276/sustainability_appraisal_summary_2017

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Annex B: Duty to Cooperate Responses**Summary of Prescribed Body Representations on City of York Local Plan Pre Publication Draft (Regulation 18) Consultation, 2017**

Prescribed Body	Summary of Representation
East Riding of Yorkshire Council (ERC)	<ul style="list-style-type: none"> • The draft plan, which has been based on ongoing co-operation between the two authorities throughout the plan making process. • Strongly supports the provision of sufficient housing within the York Local Plan to enable the full need for housing to be met within the York HMA. • Welcomes the identification of strategic highways network improvements at Grimston Bar in policy T4 and the need for joint working. • Expressed concern at the Breen Belt boundary being set precisely at 6miles from the city centre as this would encroach into East Riding. • More detailed comments relating to Site ST15 Land West of Elvington Lane
Environment Agency	<ul style="list-style-type: none"> • On the whole, the Environment Agency's comments from previous consultations have been taken on board and the EA find the content of the plan positive. The section on green infrastructure is good and recognises the dual of both green open spaces and mitigation of current and future flood risk, as sustainable drainage systems (SuDS) or flood storage, can be achieved. • More detailed comments on policies relevant to its remit, e.g. Flood risk and land contamination.
Hambleton District Council (HDC)	<ul style="list-style-type: none"> • The document identifies sufficient land to meet the development needs of the City and establishes a Green Belt enduring 20 years. It does not safeguard land for development and recognises the build out time of the strategic sites will extend beyond the plan period. The proposed detailed boundaries of the Green Belt offer little opportunity to accommodate the increased level of growth proposed in the White Paper, should this be required. • If the City of York does not ensure that its longer term development needs are met this will place pressure on areas in neighbouring authorities. • The Local Plan has been subject to viability testing and the proposed allocations have been selected through a robust assessment process, but the level of assessment that has been undertaken to confirm the viability and deliverability of the allocated sites is unclear
Harrogate Borough Council (HBC)	<ul style="list-style-type: none"> • No representation made at this stage but ongoing discussions under the Duty will continue as the plan is taken forward
Highways England (HE)	<ul style="list-style-type: none"> • Welcome the emphasis on sustainable travel, high quality public transport links serving new sustainable communities and travel planning as key components of policy, and that new development sites are located with

Summary of Prescribed Body Representations on City of York Local Plan Pre Publication Draft (Regulation 18) Consultation, 2017	
Prescribed Body	Summary of Representation
	<p>good access to public transport, walking and cycling networks, thereby minimising growth in traffic.</p> <ul style="list-style-type: none"> • The Plan lacks recognition of the scale of the forecast traffic growth on the A64 trunk road and its junctions with local primary roads will require physical mitigation in the form of investment in highway infrastructure despite the extensive sustainable travel proposals. • The spatial distribution and particularly the development of land opportunities in the south and eastern parts of York should be dependent upon agreement between the Council and HE of a Management Strategy for the A64 and its junctions with the local primary road network. • HE expects that the strategic sites located around the A1237 Northern Ring Road will combine to have a significant impact on the junctions of the A1237 with that A64 east and west of York. It will need to have a good understanding of that cumulative impact if it is to be able to state that the Plan is sound at Publication Draft stage. • HE will continue to work in partnership with CYC to understand the impact of the Local Plan proposals on the operation of the A64 and its junctions with the primary road network. • Requested that the key principles in many of the Spatial Strategy (SS) policies for the strategic sites be modified to include HE as an organization to be consulted with by developers when demonstrating that all transport issues have been addressed. • Requested explanatory text to several Spatial Strategy (SS) policies for the strategic sites be modified to include the need for a Transport Assessment to support the key principles relating to demonstrating that all transport issues have been addressed.
Leeds City Region Local Enterprise Partnership (LCR LEP) / West Yorkshire Combined Authority (WYCA)	<ul style="list-style-type: none"> • The Plan forms a complete suite of local policies and directly addresses many aspects of the strategies in the SEP. • Land allocations for the provision of jobs will support sustainable economic activity with a focus on allocating enough sites to satisfy market demand and maximise connectivity to transport • The Plan supports the aim of increasing the amount of energy generated from renewable and low carbon sources, and supports proposals for renewable and low carbon infrastructure. These elements are well-aligned with the SEP • York has not applied the 10% market signals adjustment as recommended in the York 2017 Strategic Housing Market Assessment. • The Plan policies could strengthen the commitment to delivering better digital infrastructure which would support

Summary of Prescribed Body Representations on City of York Local Plan Pre Publication Draft (Regulation 18) Consultation, 2017	
Prescribed Body	Summary of Representation
	<p>the SEP priorities</p> <ul style="list-style-type: none"> • Sites and policies are not supported by an up to date infrastructure delivery plan and one would be expected. • The Plan acknowledges that commuting to destinations outside York occurs. Welcome that improvements to York Railway Station are included in the plan to accommodate enhancements for the planned electrification of the Trans Pennine Line, HS2 and Northern Powerhouse Rail aspirations.
North Yorkshire County Council (NYCC)	<ul style="list-style-type: none"> • York is an important driver for growth both within the York, North Yorkshire and East Riding LEP area and the Leeds City Region. It is important that the City has a robust and high quality Local Plan in place that best enables it to unlock economic growth and prosperity for the benefit of its communities and those of its wider hinterland. • Welcome the commitments set out in Policy DP1: York Sub Areas. In particular that York will <i>'fulfil its role as a key driver in the Leeds City Region , York, North Yorkshire and East Riding Local Enterprise Partnership (LEP) area...'</i> and <i>'The housing needs of City of York 's current and future population including that arising from economic and institutional growth is met within the York local authority area.'</i> • Support the general thrust and intent of Policy SS1 : Delivering sustainable growth for York • Policy SS2: the Role of York's Green Belt - defining a clear and detailed inner boundary of the York Green Belt is welcomed and supported. In defining the Green Belt boundary it is important that the evidence underpinning the decision is clearly presented and included within the narrative accompanying the policy. NYCC recognise that the Plan makes provision up to 2038, providing for an additional 5 years beyond the plan period. In adopting this approach it is acknowledged that in the longer term consideration will need to be given to how future growth needs will be managed to provide confidence in relation to planning for infrastructure and services including within neighbouring parts of North Yorkshire • Any traffic impact on NYCC's local highway network that could arise from allocations need to be identified and considered. Where it is clear that a development will have a material impact on its local highway network, NYCC request to be included in agreeing the scoping for the Transport Assessment (TA) and Travel Plan (TP) in addition to being formally consulted during the application process. • Ask that within CYC's transport evidence account is taken of the traffic generated by the allocations of surrounding planning authorities., particularly Harrogate district and

Summary of Prescribed Body Representations on City of York Local Plan Pre Publication Draft (Regulation 18) Consultation, 2017	
Prescribed Body	Summary of Representation
	<p>the Green Hammerton settlement and that committed developments within North Yorkshire that will impact on cross border issues are included.</p> <ul style="list-style-type: none"> • The Development of the York Central site will provide new economic and residential uses and activity in the centre of the City in a location well connected to sustainable transport which will benefit from regeneration.
Ryedale District Council (RDC)	<ul style="list-style-type: none"> • No representation made at this stage but ongoing discussions under the Duty will continue as the plan is taken forward
Selby District Council (SDC)	<ul style="list-style-type: none"> • Broadly supports the Local Plan approach and its policies, and more specifically, Policy DP1 • SDC notes Policy SS1 states that the plan will deliver a minimum of 867 dwellings per year .Having read the SHMA Addendum, it is also noted that this figure does not take into account the level of employment growth proposed by the Local Plan and that the SHMA has not undertaken a full update to the analysis of economic growth. Whilst the SHMA concludes that there is unlikely to be any justification for an uplift in housing numbers in York to support expected growth in employment, Selby District Council need to be confident that undertaking a policy-on approach to housing need would identify no more than 867 dwellings per annum. • CYC will also be aware of the proposed methodology for the calculation of housing need requirements set out in the in the DCLG consultation on 'Planning for the Right Homes in the Right Places', which if taken forward would increase York's housing requirement figure to 1,070 dwellings per annum. Whilst you are confident that you can realise the growth aspirations detailed within the Pre-Publication Local Plan within the City of York boundary, Selby District Council is concerned that any increases to this figure could raise significant cross-boundary issues. • Question whether a Green Belt boundary enduring for 20 years is sufficient to meet the NPPF as it pertains to the intended permanence of Green Belt boundaries in the long term so they are capable of enduring beyond the plan period. • Site ST15 is in a remote location and will require significant investment in public transport infrastructure. The cumulative impact of this proposed new settlement on the highways network, along with the proposed expansion of York University (Site ST27) and the employment allocation at Elvington Airfield will need to be mitigated. Selby District Council need more detail to that shown in the Transport Topic Paper, before providing any further comments on the potential impact this allocation may have on Selby district. • CYC as education authority, will need to be satisfied that

Summary of Prescribed Body Representations on City of York Local Plan Pre Publication Draft (Regulation 18) Consultation, 2017	
Prescribed Body	Summary of Representation
	Wheldrake with Thorganby CE School is capable of meeting any additional demand generated by Site ST33, without any detriment to the population of Thorganbury (in Selby District)
York, North Yorkshire and East Riding Local Enterprise Partnership (YNYER LEP)	<ul style="list-style-type: none"> • The quantum and nature of the proposed development will be of great strategic benefit to this LEP area and it is important that the Local Plan is advanced to adoption quickly to allow delivery of these sites. • Past issues of under delivery of housing, together with recent market signals for York mean that it will be essential to achieve the proposed minimum annual provision of 867 dwellings over the plan period, together with any additional homes to reflect under delivery. • Concerned at only 60,000m² of B1a office space at York Central, given the significantly higher figure in the EZ proposal and the pivotal role of such development on this site for the economy of York and the LEP area • Welcome the funding from WYCA to undertake feasibility and business case development for dualling the A1237 • Grimston Bar junction, that already has capacity problems and faces increasing pressure through the Local Plan proposals, is important for east-west connectivity

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The 'Better Decision Making' tool should be completed when proposing new projects, services, policies or strategies.

This integrated impact assessment tool was designed to help you to consider the impact of your proposal on social, economic and environmental sustainability, and equalities and human rights. The tool draws upon the priorities set out in our Council Plan and will help us to provide inclusive and discrimination-free services. The purpose of this new tool is to ensure that the impacts of every proposal are carefully considered and balanced and that decisions are based on evidence.

Part 1 of this form should be completed as soon as you have identified a potential area for change and when you are just beginning to develop a proposal. If you are following the All About Projects Framework it should be completed before going through Gateway 3.

Part 2 of this form should be filled in once you have completed your proposal and prior to being submitted for consideration by the Executive. If you are following the All About Projects Framework it should be completed before going through Gateway 4. Your answer to questions 1.4 in the improvements section must be reported in any papers going to the Executive and the full 'Better Decision Making' tool should be attached as an annex.

Guidance to help you complete the assessment can be obtained by hovering over the relevant text or by following this link to the 'Better Decision Making' tool on Colin.

Guidance on completing this assessment is available by hovering over the text boxes.

Please complete all fields (and expand if necessary).

Introduction

Service submitting the proposal:	Strategic Planning
Name of person completing the assessment:	Alison Cooke
Job title:	Development Officer
Directorate:	Economy and Place
Date Completed:	23rd January 2018
Date Approved: form to be checked by service manager	

Part 1

Section 1: What is the proposal?

1.1	Name of the service, project, programme, policy or strategy being assessed? Pre Publication Draft Local Plan 2017
1.2	What are the main aims of the proposal? The main aim of the report is to update Members on the response to the Pre Publication Draft Local Plan Consultation 2017. It presents a background summary of previous iterations of draft policies and the circumstances which led to the rationale of the Executive decision to approve the Pre-Publication Draft Local Plan for consultation. It also provides a summary of the present national policy and legislative context, and Officers' advice on appropriate responses to the Consultation outcomes.
1.3	What are the key outcomes? The Local Plan is the planning policy document through which we aim to deliver York's sustainable development objectives in a spatial way through identifying policies to inform decision making and site allocations to meet development needs.

Section 2: Evidence

2.1	<p>What data / evidence is available to understand the likely impacts of the proposal? (e.g. hate crime figures, obesity levels, recycling statistics)</p> <p>The proposed changes as a result of the Consultation responses are set out in Annex A against each of the sites and policies.</p>
2.2	<p>What public / stakeholder consultation has been used to support this proposal?</p> <p>The Local Plan process has been subject to several consultations, the latest of which was the Pre Publication Draft (2017). This set out the Council's preferred housing and employment need as well as sites to satisfy the demand. The outcomes of this consultation have been reviewed and incorporated into the emerging position. Annex A accompanies this report setting out the proposed changes, supported by the evidence base. Further consultation, subject to members decision, will take place in Spring 2018.</p>
2.3	<p>Are there any other initiatives that may produce a combined impact with this proposal? (e.g. will the same individuals / communities of identity also be impacted by a different project or policy?)</p> <p>This report will ultimately feed into the Regulation 19 Local Plan wherein it is likely to be positive through meeting the city's spatial development needs and contribute towards meeting York's sustainable development objectives. Specifically in relation to communities, this will effect all people in York who engage with planning such as through obtaining planning permission as well as ensuring planning policies in place to meet the city's objectives for sustainable development.</p>



Part 1

Section 3: Impact on One Planet principles

Please summarise any potential positive and negative impacts that may arise from your proposal on staff or residents. This section relates to the impact of your proposal on the One Planet principles.

For 'Impact', please select from the options in the drop-down menu. If you wish to enter multiple paragraphs in any of the boxes, hold down 'Alt' before hitting 'Enter'.

Equity and Local Economy

Does your proposal?	Impact	What are the impacts and how do you know?
3.1 Impact positively on the business community in York?	Positive	The policies of the Local Plan support the delivery of the city's economic objectives and will enable York to realise its economic growth ambitions as set out in the city's economic strategy (2016). It will promote private sector employment growth through the provision of sites and infrastructure to deliver new jobs over the plan period for current and future residents. The Employment Land Review (2016 and update 2017) sets out our assumptions for identifying employment need. Meeting York's housing requirements is also likely to have a positive outcome for provision of affordable housing for workers within York.
3.2 Provide additional employment or training opportunities in the city?	Positive	The policies of the local plan support the delivery of the city's economic objectives and will enable York to realise its economic growth ambitions as set out in the city's economic strategy (2016). It will promote private sector employment growth through the provision of sites and infrastructure to deliver new jobs over the plan period for current and future residents. Housebuilding and commercial development as a result of allocations in the LocalPlan may provide some certainty over jobs in construction. The scale of employment activity depends on the growth targets agreed.
3.3 Help individuals from disadvantaged backgrounds or underrepresented groups to improve their skills?	Positive	The plan supports the delivery of the city's economic objectives and social objectives, including promoting social inclusivity. The plan will help to unlock the further potential of the higher and further education sector in York through development and redevelopment.

Health & Happiness	
Does your proposal?	What are the impacts and how do you know?
3.4 Improve the physical health or emotional wellbeing of staff or residents?	Neutral The Local Plan aims to support healthy lifestyles and healthy environments across the city. The plan includes policies to conserve and enhance York's green infrastructure, providing opportunities for a healthy lifestyle and optimising its role in contributing to York being a healthy city, drawing on the Open Space Study (2014) and its 2017 update. Providing homes to meet the needs of people will also have a positive impact on people's well being.
3.5 Help reduce health inequalities?	Positive The community facilities section of the plan has been revised to have a greater focus on health and wellbeing. The new section covers the protection and enhancement of sports, healthcare, childcare, and community facilities. An additional policy related to healthy placemaking has been added which encourages designing environments that encourage health-promoting behaviours, helping to delivery York's Joint Health and Wellbeing Strategy and the Council Plan. There are also opportunities as part of new development for the provision of new services. These will have to be developed in tandem to avoid negatives impact in the short-term.
3.6 Encourage residents to be more responsible for their own health?	Neutral The Local Plan encourages healthy lifestyles through the safeguarding and provision of different types of openspace and recreational opportunities. The plan includes policies to conserve and enhance York's green infrastructure, providing opportunities for a healthy lifestyle and optimising its role in contributing to York being a healthy city. See Annex 7 to this report to see updates to these policies.
3.7 Reduce crime or fear of crime?	Positive The plan includes a placemaking policy which seeks to balance the needs of urban design principles for good design against 'secured by design' principles to design out crime, helping to delivery the City of York Streetscape Strategy Guidance (2014). See Annex 7 to this report to see updates to these policies.
3.8 Help to give children and young people a good start in life?	Positive The Local Plan seeks to respond to the need to increase primary and secondary education provision, including addressing need arising from strategic development sites and supporting proposals to ensure that existing facilities can continue to meet modern educational requirements. See Annex 7 to this report to see updates to these policies.

Culture & Community

	Does your proposal?	Impact	What are the impacts and how do you know?
3.9	Help improve community cohesion?	Neutral	Community cohesion and the development of strong, supportive and durable communities is promoted through the creation of sustainable, low carbon neighbourhoods.
3.10	Improve access to services for residents, especially those most in need?	Positive	The plan will prioritise tackling existing gaps and prevent gaps from being created in the provision of key services and public transport, helping to support the Council's Transport Plan 2011-2031. The Plan's spatial strategy also uses access to services and transport as a key indicator for sustainability and uses this to help determine suitable sites for development. The majority of strategic allocations are also expected to incorporate local provision on site and have access to sustainable transport.
3.11	Improve the cultural offerings of York?	Positive	A new cultural provision policy has been developed as well as strengthening references to culture throughout the plan. The new policy supports development proposals where they are designed to sustain, enhance and add value to the special qualities and significance of York's culture. See Annex 7 to this report to see the new and revised policies.
3.12	Encourage residents to be more socially responsible?	Positive	Through consultation the local plan process actively encourages residents to shape their communities by commenting on the policies that will shape development in the future in line with the Council's Statement of Community Involvement (2007)

Zero Carbon and Sustainable Water

Does your proposal?	Impact	What are the impacts and how do you know?

3.13	<p>Minimise the amount of energy we use, or reduce the amount of energy we will use/pay for in the future?</p>	Mixed	<p>The plan will respond to the opportunities offered by the city's natural resources whilst at the same time protecting current and future residents from environmental impacts. It will help York become a sustainable, resilient and collaborative 'One Planet'. It will create energy efficient buildings, support the use of energy from renewable sources and ensuring York is climate ready. Notwithstanding this, development in York is likely to increase the city's resource consumption. Local Plan policy relating to climate change, renewable energy and sustainable design have been updated in line with new/updated evidence base and legislation. See Annex 7 to this report for updates to these policies.</p>
3.14	<p>Minimise the amount of water we use or reduce the amount of water we will use/pay for in the future?</p>	Mixed	<p>The plan will respond to the opportunities offered by the city's natural resources whilst at the same time protecting current and future residents from environmental impacts. It will help York become a sustainable, resilient and collaborative 'One Planet' city, ensuring that new development uses water efficiently and delivers sustainable drainage solutions. Local Plan policy relating to climate change, renewable energy and sustainable design have been updated in line with new/updated evidence base and legislation. See Annex 7 to this report for updates to policy.</p>
3.15	<p>Provide opportunities to generate energy from renewable/low carbon technologies?</p>	Positive	<p>A revised climate change section now more strongly ties the policies to the social and economic benefits of low carbon developments which consider sustainable design and construction principles. See Annex 7 to this report for updates to policy.</p>

Zero Waste	
3.16	<p>Does your proposal?</p> <p>Reduce waste and the amount of money we pay to dispose of waste by maximising reuse and/or recycling of materials?</p>
Impact	<p>What are the impacts and how do you know?</p> <p>The plan will contribute to the reduction of waste through supporting innovation and improvement of current waste practices and the promotion of recycling. Sustainable design and construction principles will be embedded in new developments. Local Plan policy relating to Waste management has been revised in line with the emerging Joint Minerals and Waste Local Plan being prepared by North Yorkshire County Council, City of York Council and North York Moors National Park. See Annex 7 to this report for updates to policy</p>

Sustainable Transport	
3.17	<p>Does your proposal?</p> <p>Encourage the use of sustainable transport, such as walking, cycling, ultra low emission vehicles and public transport?</p>
3.18	<p>Does your proposal?</p> <p>Help improve the quality of the air we breathe?</p>
Impact	<p>What are the impacts and how do you know?</p> <p>The plan will help deliver a fundamental shift in travel patterns by ensuring that sustainable development and travel planning is a key component of future development, promoting sustainable connectivity, reducing the need to travel, helping to deliver the infrastructure to support sustainable transport and managing private travel demand. Helping to support the Council's Transport Plan 2011-2031. This has also been translated into the Site Selection process as a key stage in considering suitability of a potential development site. The outcomes of sites are referred to in annexes 3-5. See Annex 7 for revisions to policy.</p> <p>Positive</p>
Impact	<p>The plan supports measures to help reduce the emissions of Nitrogen Dioxide, Particulate, Carbon Dioxide and other greenhouse gases from both transport and other sources helping to deliver the Council's Low Emission Strategy (2012) and therefore features as a consideration throughout the Local Plan. See Annex 7 to this report for detailed updates to policy.</p> <p>Positive</p>
Sustainable Materials	
3.19	<p>Does your proposal?</p> <p>Minimise the environmental impact of the goods and services used?</p>
Impact	<p>What are the impacts and how do you know?</p> <p>Development advocated by the Local Plan will have an inevitable impact on the use of resources and waste. However, sustainable design and construction principles will be embedded in new developments through policy. See annex 7 to this report for detailed policy updates.</p> <p>Mixed</p>
Local and Sustainable Food	
3.20	<p>Does your proposal?</p> <p>Maximise opportunities to support local and sustainable food initiatives?</p>
Impact	<p>What are the impacts and how do you know?</p> <p>n/a</p> <p>Neutral</p>
Land Use and Wildlife	

Does your proposal?	What are the impacts and how do you know?	Impact
<p>3.21</p> <p>Maximise opportunities to conserve or enhance the natural environment?</p>	<p>York's Green Infrastructure, including open space, landscape, geodiversity, biodiversity and the natural environment will be both conserved and enhanced. This is a key consideration in the Local Plan and evidence base such as the Green Infrastructure and Openspace Study (2014, Openspace update 2017). The vision, spatial strategy and specific policies all support the conservation and enhancement of the natural environment. Furthermore, this is translated into the Site Selection methodology to determine a potential site's suitability for development. See Annex 7 for updates to specific policies and annexes 3-5 to see comments in relation to specific sites.</p>	<p>Positive</p>
<p>3.22</p> <p>Improve the quality of the built environment?</p>	<p>The Local Plan will help York to safeguard its outstanding heritage for future generations by promoting development which respects the city's special character and culture and encourages opportunities for rediscovering and reinterpreting those assets which make it an attractive, beautiful and accessible city. The Plan will do this through the conservation and enhancement of six defining characteristics of York's built environment; strong urban form, compactness, landmark monuments, unique architectural character, archaeological complexity and landscape setting set out in the Heritage Topic Paper (2014) and Heritage Impact Appraisal (tbc 2017).</p>	<p>Positive</p>
<p>3.23</p> <p>Preserve the character and setting of the historic city of York?</p>	<p>The plan will help York to safeguard its outstanding heritage for future generations by promoting development which respects the city's special character. The Local Plan will ensure that the city's heritage assets are preserved and enhanced. Beyond the city centre, the key radial routes are of particular importance, and the surrounding villages and Green Infrastructure, including its valued strays, river corridors and open spaces that contribute to the city's setting. The Historic Character and Setting evidence base (2003 updated in 2013 and 2014) identifies areas of primary importance for this. The Plan will also create a Green Belt for York that will endure beyond the end of this plan period providing a lasting framework to shape the future development of the city. Its primary aim will be to preserve and enhance the special character and setting of York. It will also have a critical role in ensuring that development is directed to the most sustainable locations.</p>	<p>Positive</p>

3.24	Enable residents to enjoy public spaces?	Positive	Development will not be permitted which would harm the character of or lead to the loss of open space of environmental and or recreational importance unless it can be satisfactorily replaced. All residential development should contribute to the provision of open space for recreation and amenity. As supported by the open space study (2014) and its update and the Green Infrastructure Strategy.
3.25	Additional space to comment on the impacts		

Part 1

Section 4: Impact on Equalities and Human Rights

Please summarise any potential positive and negative impacts that may arise from your proposal on staff or residents. This section relates to the impact of your proposal on **advancing equalities and human rights** and should build on the impacts you identified in the previous section.

For 'Impact', please select from the options in the drop-down menu.
 If you wish to enter multiple paragraphs in any of the boxes, hold down 'Alt' before hitting 'Enter'

Equalities

Will the proposal **adversely impact** upon 'communities of identity'?
 Will it **help advance equality** or **foster good relations** between people in 'communities of identity'?

		Impact	What are the impacts and how do you know?	Relevant quality of life
4.1	Age	Positive	The plan will meet housing needs and provide a range of house types for all ages. The SHMA (2016) and SHMA update (2017) provide relevant evidence for this. It will also improve the safety and accessibility of the city's streets and spaces.	Comfortable standard of living
4.2	Disability	Positive	The plan will meet housing needs and provide a range of house types for all ages. The SHMA (2016) and SHMA update (2017) provide relevant evidence for this. It will also improve the safety and accessibility of the city's streets and spaces.	Comfortable standard of living
4.3	Gender	Neutral	None deemed likely	n/a
4.4	Gender Reassignment	23rd January 2018	None deemed likely	n/a
4.5	Marriage and civil partnership	Neutral	None deemed likely	n/a
4.6	Pregnancy and maternity	Neutral	None deemed likely	n/a
4.7	Race	Positive	Meeting Gypsy, Traveller and Travelling Showpeople's accommodation needs, supporting the outcomes of the Gypsy and Traveller Accommodation Assessment (2017)	Comfortable standard of living
4.8	Religion or belief	Neutral	None deemed likely	n/a
4.9	Sexual orientation	Neutral	None deemed likely	n/a
4.10	Carer	Neutral	None deemed likely	n/a
4.11	Lowest income groups	Positive	The plan will meet housing needs and provide a range of house types. The SHMA (2016) and SHMA update (2017) provide relevant evidence for this, including the need for affordable housing.	Comfortable standard of living
4.12	Veterans, Armed forces community	neutral	The emerging Local Plan and supporting evidence considers the potential of the MOD sites in York for development following the Defence Infrastructure Estates Review (2016). The closure of these sites will have an impact on the armed forces community which is out of the remit of the Local Plan.	n/a

Human Rights

Consider how a human rights approach is evident in the proposal

		Impact	What are the impacts and how do you know?
4.13	Right to education	neutral	None deemed likely
4.14	Right not to be subjected to torture, degrading treatment or punishment	neutral	None deemed likely
4.15	Right to a fair and public hearing	neutral	None deemed likely
4.16	Right to respect for private and family life, home and correspondence	neutral	None deemed likely
4.17	Freedom of expression	neutral	None deemed likely
4.18	Right not to be subject to discrimination	neutral	None deemed likely
4.19	Other Rights	neutral	None deemed likely

4.20	Additional space to comment on the impacts

Part 1

Section 5: Developing Understanding

Based on the information you have just identified, please consider how the impacts of your proposal could be improved upon, in order to balance social, environmental, economic, and equalities concerns, and minimise any negative implications.

It is not expected that you will have all of the answers at this point, but the responses you give here should form the basis of further investigation and encourage you to make changes to your proposal. Such changes are to be reported in the final section.

	Taking into consideration your responses about <u>all of the impacts</u> of the project in its <u>current form</u>, what would you consider the overall impact to be on creating a fair, healthy, sustainable and resilient city?
5.1	Given the wide range of policy areas covered by the Local Plan and its over all vision which responds to the issues, opportunities and challenges facing the city it is considered that the plan will have a strongly positive impact overall on creating a fair, healthy, sustainable and resilient city.

	What could be changed to improve the impact of the proposal on the <u>One Planet principles</u>? (please consider the questions you marked either mixed or negative, as well as any additional positive impacts that may be achievable)
5.2	Preparation of the Local Plan is part of an ongoing process that involves monitoring the success and progress of its policies. The process will make sure it is achieving its objectives and making necessary adjustments to the plan if the monitoring process reveals that changes are needed. This enables the plan to maintain sufficient flexibility to adapt to changing circumstances. Furthermore, the plan is subject to ongoing Sustainability Appraisal incorporating the requirements of Strategic Environmental Assessment which appraises the plan and site allocations against a bespoke social, economic and environmental objectives to understand how the plan is contributing the sustainable development objectives for York.

	What could be changed to improve the impact of the proposal on <u>equalities and human rights</u>? (please consider the questions you marked either mixed or negative, as well as any additional positive impacts that may be achievable)
5.3	No mixed or negative impacts on equality and human rights are considered likely.

Section 6: Planning for Improvement

23rd January 2018

	What further evidence or consultation is needed to fully understand its impact? (e.g. consultation with specific communities of identity, additional data)
6.1	Members will use the recommendations to decide the future approach for the Local Plan which will then be subject to public consultation. A publication draft plan will then be prepared before being submitted to the secretary of state for examination.

6.2 **What are the outstanding actions needed to maximise benefits or minimise negative impacts in relation to this proposal?** Please include the action, the person(s) responsible and the date it will be completed (expand / insert more

Action	Person(s)	Due date

6.3 **Additional space to comment on the impacts**

Part 2

Section 1: Improvements

Part 2 builds on the impacts you identified in Part 1. Please detail how you have used this information to make improvements to your final proposal.

Please note that your response to question 1.4 in this section must be reported in the One Planet Council implications section of reports going to the Executive.

1.1	<p>For the areas in the 'One Planet' and 'Equalities' sections, where you were unsure of the potential impact, what have you done to clarify your understanding?</p> <p>Given the wide ranging policy areas covered in the plan and the process taken so far in preparing the plan there are inherent links and good understanding of the one planet principles and equalities.</p>
1.2	<p>What changes have you made to your proposal to increase positive impacts?</p> <p>No changes considered necessary, however the monitoring element of the local plan process will ensure the success and progress of the policies are able to adapt to changing circumstances. For example, air quality will be monitored to ensure new development does not result in poorer air quality.</p>
1.3	<p>What changes have you made to your proposal to reduce negative impacts?</p> <p>No negative impacts anticipated.</p>
1.4	<p>Taking into consideration everything you know about the proposal in its revised form, what would you consider the overall impact to be on creating a fair, healthy, sustainable and resilient city?</p> <p>Your response to this question must be input under the One Planet Council implications section of the Executive report. Please feel free to supplement this with any additional information gathered in the tool.</p> <p>Given the wide range of policy areas covered by the Local Plan and its over all vision which responds to the issues, opportunities and challenges facing the city it is considered that the plan will have a strongly positive impact overall on creating a fair, healthy, sustainable and resilient city.</p>
1.5	<p>Any further comments?</p>



Executive**25 January 2018**

Report of the Economy & Place Policy Development Committee

Impact of Arts & Culture on the Economy Scrutiny Review - Cover Report**Introduction**

1. This cover report presents the final report from the Impact of Arts & Culture on the Economy Scrutiny Review and asks the Executive to approve the recommendations arising from the review.

Review Recommendations

2. In November 2017, the Economy & Place Policy Development Committee considered the review findings arising from the review, as presented in the Task Group final report at Appendix 1 and agreed to endorse the draft recommendations listed below:
 - i. The Council should demonstrate its commitment to the city's cultural sector by progressing the development and promotion of a clearly defined Cultural Strategy with the Cultural Leaders Group, with the Council showing leadership in its creation and adoption. This should include the provision of:
 - A one-off sum of £20k early in the new financial year, to support its development;
 - An ongoing sum of £6k annually for secretarial services;
 - ii. The Council should support the Cultural Leaders Group in working as a cohesive unit to build and achieve wide acceptance of that Cultural Strategy
 - iii. As part of renewing MIY's Service Level Agreement, the Council should clarify the role of Make It York in supporting York's cultural sector and offer, and ensure it:
 - Develops a narrative about York's ambitions with cultural partners;
 - Improves its collaboration with Welcome to Yorkshire

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

OFFICE USE ONLY

ID reference:

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

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

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

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

Part A - Personal Details

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

1. Personal Details		2. Agent's Details (if applicable)
Title		Mrs
First Name		Jennifer
Last Name		Longstaff
Organisation (where relevant)	York Diocesan Board of Finance & The York and Ainsty Hunt	Savills (UK) Limited
Representing (if applicable)		York Diocesan Board of Finance & The York and Ainsty Hunt
Address – line 1		Savills
Address – line 2		26 Coniscliffe Road
Address – line 3		Darlington
Address – line 4		
Address – line 5		
Postcode		DL3 7JX
E-mail Address		Jennifer.longstaff@savills.com
Telephone Number		01325 370516

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

Guidance note

Where do I send my completed form?

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

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

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

What can I make comments on?

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

Do I have to use the response form?

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

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

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

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

Do I need to attend the Public Examination?

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

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

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

Part B - Your Representation

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

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

- City of York Local Plan Publication Draft
- Policies Map
- Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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

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

Yes No

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

Yes No

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

N/A

What does 'Sound' mean?

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

What makes a Local Plan "sound"?

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

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

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

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

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

Yes No



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

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

Positively prepared **Justified**
Effective **Consistent with national policy**

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

(Complete any that apply)

Paragraph no.

Policy Ref

Site Ref.

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

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

Savills, on behalf of the York Diocesan Board of Finance (YDBF) and The York and Alosty Hunt (The Hunt) (the landowners), jointly submit the following representations to the City of York Local Plan Publication Draft 2018 Consultation.

City of York Council is preparing a new Local Plan for York, which covers the period from 2017 to 2032/33 with the exception of the Green Belt boundaries which will endure up to 2037/38. Its main function is to set out how much and where land should be provided to accommodate the new homes and jobs that are needed in the city. It should also facilitate new infrastructure to ensure that development is sustainable. This may include new transport measures, schools, shops, community facilities and public open space and sports facilities. The Local Plan should also protect and enhance the high quality natural and built environment and heritage of York.

As set out in our comments to both Policy SS1 and Policy SS2, it is not considered that the City of York Council is proposing to submit a sound Local Plan particularly in respect of the proposed housing numbers and the associated housing allocations, to which these comment apply.

As set out at paragraph 5.2 of the draft Local Plan, it is important that the Plan delivers sufficient housing (including the right mix and type) to meet the City's needs, now and in the future. However, by seeking to adopt a plan for only 867 new dwellings per annum over the Plan period until 2033, when there is evidence that there is a need for 1070 dwellings per annum as set out in the OCLG proposed methodology for calculating housing need, it is considered that the Plan has not been prepared positively.

These concerns are also noted in the Executive Meeting Public Report (dated 25th January 2018 – attached for ease of reference) whereby Officers state that Members are going against Officers advice in respect of housing numbers and this is opening the Council up to scrutiny during the Local Plan examination

Furthermore, the Council has agreed to the employment land requirements, therefore, to ensure that the economic growth ambitions are met, the necessary housing needs to be available during the lifetime of the Plan.

Whilst it is acknowledged that the formal changes to the NPPF have not yet been incorporated by the Government, the revised NPPF is not far off publication. As such, the Council should be supporting a pro-growth approach, especially since they haven't had an adopted Plan in place since 1956.

It is therefore proposed that, due to the existing, tightly set Green Belt boundaries, the Council should seek to delete more land from the Green Belt and allocate more housing and to ensure that there is housing land available during and beyond the Plan period to meet the objectively assessed housing need.

YDBF and The Hunt are committed to working alongside the City of York Council to bring forward deliverable housing sites under their ownership.

This representation is made in respect of the following site which is under the joint ownership of the YDBF and the Hunt, and as such, would like to support the future allocation of this site for residential development:

- Land South of Foxwood Lane, Acomb

A site location plan of the above site is included in Appendix 1 of this submission along with the following reports:

- Initial Access Appraisal: White Young Green (WYG) (Appendix 2); and
- Potential Landscape Impact: Wainwright Landscape Architecture Assessment (Appendix 3).

Further technical work can be undertaken when deemed necessary.

'Land south of Foxwood Lane, Acomb' is located directly adjacent to existing residential development in Acomb and immediately south of Foxwood Lane. The site is approximately 4.5 hectares in size and represents a logical extension to the west of Acomb (located southwest of York). The site is also in close proximity to a range of local services and facilities (including Woodthorpe Primary School, Tesco Express, Co-op, newsagents, hairdressers, playing fields, open space, public houses, restaurants and more) and is within the existing bypass (A1237) that surrounds York.

Based on the site boundary (equating to 4.5 hectares), the development yield for the site would be circa 144-180 units (based on an 80% developable area at 40 to 50 dwellings per hectare respective γ). However, it should be noted that this number is indicative only and has not been subject to a detailed design exercise, which may result in an amendment to the indicative yield.

It should be noted that a joint approach has been taken and discussions have resulted in both parties supporting the allocation of the land to the south of Foxwood Lane for housing. This larger allocation was previously considered by the local planning authority and their evaluation of this option was set out within Appendix 4 ('Changes to Allocated Sites') of the Further Sites Consultation. In response to the site within the ownership of the YDBF, the technical officer assessment concluded that the site failed Criteria 1 and, as such, recommended that the site boundary for H9 should not be enlarged and should instead remain in its current form. However, there are very limited greenfield housing sites proposed in the south western part of the City area and we therefore disagree with the removal of this site from the list of residential allocations.

To address the previous constraints / comments identified and to demonstrate why the larger site to the south of Foxwood Lane should be allocated for housing, please see below.

Site Assessment

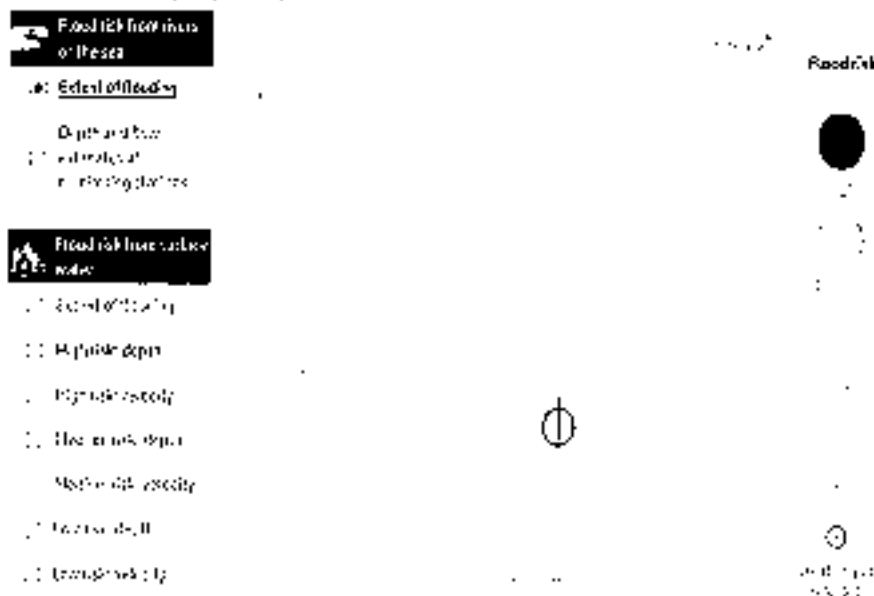
In previous consultations, the technical officer assessment contained within Appendix 4 of the Further Sites Consultation identifies three main constraints in respect of the potential enlargement of site which was previously identified as Site H9 in the earlier consultation document:

- Drainage/Flood Risk;
- Access; and,
- Landscape Impact.

We do not agree with the assessment of these issues and have responded to these three matters below.

Drainage/Flood Risk

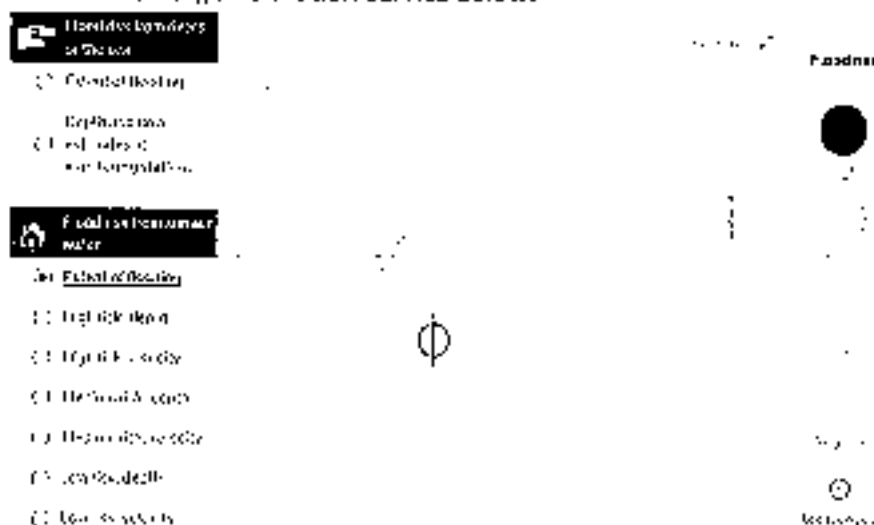
The site is located in Flood Zone 1. This position has been confirmed through a review of the Flood Map for Planning (Rivers and Sea). An extract from this map can be viewed below (note – the site has been marked with a cross for identification purposes).



(Extent of River and Sea Flood Risk Source: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?eastings=456132&northings=449964>).

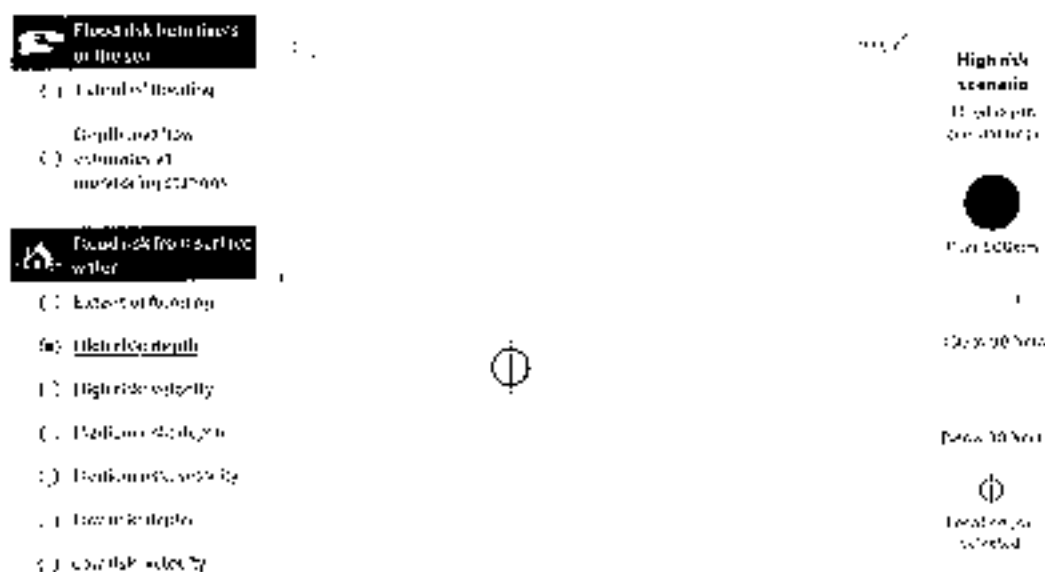
It is confirmed therefore that the site is within Flood Zone 1, which is considered to have a low probability of flooding and is defined as being land with a less than 1 in 1,000 annual probability of river and sea flooding (<1%). This is supported by the NPPF which, at paragraph 101, states that – “The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding”. We would therefore contend that this evidence confirms that flood risk is not a constraint to our client’s site south of Foxwood Lane, Acornb.

Furthermore, only a minor portion of the site is subject to possible surface water flooding. Please see the extracts from the Flood Warning Information Service below.



(Extent of Surface Water Flood Risk Source: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?eastings=456534&northings=445954>).

When considering the area of land subject to high risk surface water flooding, there is very little land subject to this implication. Please see below for reference.



{Extent of High Risk Surface Water Flood Risk Source: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?eastings=456538&northings=449964>}

Flood risk is not therefore a constraint to development and should not be considered a reason as to why the site cannot be allocated for future housing development.

Access

The previous concerns raised in respect of access were:

- Potential impact of the development on the Minor Lane junction of the A1237 as well as capacity issues at the existing;
- The site is not considered sustainable due to location and distance from services;
- Confirmation required in respect of access to public transport; and,
- Concern over the proximity to Acomb local centre (noted as being 1km away).

In response to these points, the landowners commissioned White Young Green (WYG) to undertake an initial access appraisal of the site which considers the entire site proposed for allocation. A copy of this assessment is provided in support of this document (Appendix 2).

As a starting point, it should be noted that WYG identified that a suitable vehicular access can be achieved from Foxwood Lane. A drawing has been prepared in order to demonstrate this and is also included within Appendix 2.

In terms of local transportation networks, Foxwood Lane (to the North of the site) runs in a general West to East direction from its roundabout junction with Askham Lane to its roundabout junction with Tharvet Road. From Tharvet Road, Tadcaster Road provides a direct route to York City Centre. Askham Lane (to the West) provides a direct route for residents of Acomb and Foxwood to the A1237 York Bypass for connections northward to north York, the A1(N) and Harrogate, and southwards to South and East York, A1(S) Tadcaster and Leeds via the A64. The site can therefore be seen to offer excellent connectivity to the local transportation networks.

The Council's previous assessment of the site considered the issue of services and, in particular, the proximity of the site to existing local facilities. To refute this concern it can be confirmed that:

- There are a number of schools and local facilities within a reasonable walking distance of the development site – Westfield Primary Community School is a 12-13 minute walk away, with York High School a 15 minute walk away;
- There are a number of local shops in close proximity to the site – there is a Co-Op food store and newsagents within a parade of shops on Foxwood Lane (approximately 600m from the site and within a 7-8 minute walk of the site) and a Tesco foodstore and a pub within a 12-13 minute walk to the south of the site; and,
- The site has good access to sports facilities – Oakland Sports Centre can be reached within a 15 minute walk of the site.

The average walking distance (DfT Walking Personal Travel Factsheet 2007) for all purposes is 0.7 miles (1.12km), or a 14 minute walk. Therefore, the report concludes that the local facilities are within a reasonable walking distance of the site. This provides greater clarity in respect of the concerns raised previously by the Council that raised "questions over whether facilities are only a 15 minute walk away".

Furthermore, much of York is within a 30 minute cycle ride of the site and there is a network of local routes which provide links to the city centre and other key destinations.

Additionally, the report illustrates that there are two bus stops located to the west of the proposed access that can be reached within a 2-3 minute walk from the centre of the development site and comprise shelters with timetable information. Regular and frequent bus services are available to/from York City Centre at a 7-8 minute weekday frequency. In addition, the site is accessible on foot or by bike to a range of useful local destinations, and there are public transport options available for journeys further afield.

In respect of potential traffic impacts, WYG have used the TRICS database to derive suitable multi-modal trip generation rates for the development site. This modelling has concluded that the site would generate 68 additional vehicle movements in the AM peak hour and 76 vehicle movements in the PM peak hour on the basis of 120 dwellings and is not expected to result in any capacity problems. This is considered to still be the case at the higher site capacity already discussed (circa up to 180 dwellings). However, should any capacity problems arise, the report identifies that suitable mitigation measures can be delivered as appropriate in order to address these issues. It should be recognised that, should any development on the site be brought forward, a full Transport Assessment would be undertaken that would consider transportation impacts in more detail.

Finally, it should be noted that the site is expected to generate 27 pedestrian movements in the AM peak hour. There is continuous footway from the development site to surrounding schools and facilities and no specific measures are required.

In conclusion, it is considered that all previously raised concerns relating to access and sustainability with regard to the site location have been addressed. As such, the site is a suitable site to accommodate housing as part of this Local Plan and access and location should not be identified as a reason for not allocating the site for residential development.

Landscape Impact

The Council also previously raised landscape impact as a potential concern, namely that the extension of what was previously identified as allocation H9 would "undermine the setting of the city in this location, especially given the gentle topography of the site".

In response to this, our clients commissioned Wainwright Landscape Architecture to undertake an assessment of the potential landscape impact the land south of Foxwood Lane, Acornb. This assessment has taken into account the landscape value of the entire site. A copy of this assessment is provided in support of this document (Appendix 3).

The report considered the site to be "relatively well screened by local undulating topography, particularly long distance views from the West and the South, including the Outer Ring Road A1237 and Askham Lane". In addition, the report states that, while the central southern part of the site does rise towards 'Great Knoll', "views are locally contained to fringe housing to the North and East of the site along Foxwood Lane and Stirrup Close". It should also be noted that York Minster does not form a significant part of views to the site.

The report also identifies, at Section 4, that historical mapping indicates that 'York & Ainsty Kennels' once existed on the site, thereby setting a precedent in respect of the fact that the site has been partly developed in the past. The report confirms that there are no Listed Buildings, Tree Preservation Orders (TPOs), Public Rights of Way (PROW), Public Open Space or other planning designations directly affecting the site.

On the basis of the above comments and documents set out at Appendix 2 and 3, it is considered that all previous areas of concerns have been addressed. We therefore consider our client's land, as identified in Appendix 1, to be suitable, available, achievable and deliverable land to accommodate housing development during the plan period. In conclusion, we respectfully request that the land is deleted from the Green Belt and allocated for housing during the Plan period.

The site, due to its size, is also considered capable of being brought forward in the short to medium term (1-10 years). We therefore respectfully request that the site is added to Table 5.1 of the Draft Plan.

Furthermore, based on the site boundary (equating to 4.5 hectares), the development yield for the site known as 'land south of Foxwood Lane, Acomb' would be circa 144 - 180 units (this is based on a 80% of the gross site area being developable at a general density of 40 to 50 dwellings per hectare respectively). As such, Table 5.1 should also be amended to include the estimated yield (dwellings) for the site to be circa 180 (subject to detailed site assessments on final site capacity).

Moving away from site specific comments, we also note, as part of Policy H1 (page 94 of the consultation document), that the Local Plan proposes an annual figure for 169 dwellings to come via windfall sites. Due to the existing restrictive nature York City has owing to the existing draft green belt boundary and the diminishing infill sites available, we question whether this number of units can be achieved via windfall sites?

In conclusion, due to the current undersupply in respect of the number of dwelling proposed per annum, the existing draft Green Belt Boundary, and the limited land available for windfall development due to existing designation implications, we continue to support and propose that our client's land, "land south of Foxwood Lane, Acomb", should be identified as an additional housing site within the Local Plan to help ensure that the appropriate number of housing sites are allocated and delivered.

This site represents a logical extension to the southwest of the settlement. This site should therefore be deleted from the Green Belt and included in Policy H1 as a housing allocation during the Plan period. The scale of development is not considered to be detrimental to the existing infrastructure and landscape. Indeed, suitable additional reports, to supplement those already undertaken and provided as part of this submission, could be prepared to address any remaining issues should it be deemed necessary to prepare these.

It should also be noted that, if a development on the site was brought forward, developer contributions would be required and these would provide further benefit to the local area.

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.

It is not considered that the City of York Council is proposing to submit a sound Local Plan particularly in respect of the proposed housing numbers set out in Policy 551 and the associated housing allocations in Policy H1. We therefore request that the Council increase its housing numbers and, as part of this, seek to delete more land from the Green Belt in appropriate locations and propose additional housing allocations.

To support this we request that our clients site, 'Land off Foxwood Lane, Acornb' (please see Appendix 1 for reference), should be deleted from the Green Belt and allocated as a housing site. This submission and the associated appendices / documents provide certainty and clarity as to the suitability of the site for housing.

In line with this additional housing allocation, and to ensure that the Plan is succinct, the Key Diagram on page v) should be amended to include our clients site as a residential allocation and deleted from the Green Belt.

Furthermore, the site off Foxwood Lane should be added to Table 5.1 of the Draft Plan as an additional housing allocation for circa 180 dwellings to meet appropriate housing needs and demand

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

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

Yes, I wish to appear at the examination

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

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

N/A

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

Part C - How we will use your Personal Information

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

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

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

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

Storing your information and contacting you in the future:

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

Retention of Information

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

Your rights

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

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at haveyoursay@york.gov.uk or on 01904 664145

Signature



Date

03/04/18

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17, 22, 25 & 30 Town and Country Planning (Local Planning) (England) Regulations 2012

² Regulation 29 Town and Country Planning (Local Planning) (England) Regulations 2012

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

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

OFFICE USE ONLY:
 ID reference

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

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

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

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

Part A - Personal Details

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

1. Personal Details		2. Agent's Details (if applicable)
Title		Mrs
First Name		Jennifer
Last Name		Longstaff
Organisation (where relevant)	York Diocesan Board of Finance & The York and Ainsty Hunt	Savills (UK) Limited
Representing (if applicable)		York Diocesan Board of Finance & The York and Ainsty Hunt
Address – line 1		Savills
Address – line 2		26 Coniscliffe Road
Address – line 3		Darlington
Address – line 4		
Address – line 5		
Postcode		DL3 7JX
E-mail Address		Jennifer.longstaff@savills.com
Telephone Number		01326 370516

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/raction group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

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

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

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

Part B -Your Representation

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

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

- City of York Local Plan Publication Draft
- Policies Map
- Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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

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

Yes No

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

Yes No

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

N/A

What does 'Sound' mean?

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

What makes a Local Plan "sound"?

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

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

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

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

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

Yes No



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

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

Positively prepared Justified
Effective Consistent with national policy

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

(Complete any that apply)

Paragraph no.

Policy Ref

Site Ref.

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

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

Savills, on behalf of the York Diocesan Board of Finance (YDBF) and The York and Ainsty Hunt (The Hunt) (the landowners), jointly submit the following representations to the City of York Local Plan Publication Draft 2018 Consultation.

City of York Council is preparing a new Local Plan for York, which covers the period from 2017 to 2032/33 with the exception of the Green Belt boundaries which will endure up to 2037/38. Its main function is to set out how much and where land should be provided to accommodate the new homes and jobs that are needed in the city. It should also facilitate new infrastructure to ensure that development is sustainable. This may include new transport measures, schools, shops, community facilities and public open space and sports facilities. The Local Plan should also protect and enhance the high quality natural and built environment and heritage of York.

With regard to Sustainable Growth, it is not considered that the Council is seeking to address the objectively assessed housing need.

Policy SS1 sets out that the City Council via the Local Plan will deliver a minimum annual provision of 867 new dwellings over the plan period until 2033 (and post plan period until 2038 in respect of Green Belt). However, it is not considered that the City of York Council is proposing to submit a sound Local Plan particularly in respect of the proposed housing numbers set out and the associated housing allocations.

As set out in the Executive Meeting Public Report (dated 25th January 2018 – attached for ease of reference), Members have gone against Officers advice with regard to housing provision.

To support the Local Plan, a Strategic Housing Market Assessment (SHMA) which made a recommendation on the level of housing growth and an Employment Land Review (ELR) were prepared to assess an accurate need and demand for development sites during the Plan period. However, it is considered that the draft Plan fails to comply with the Strategic Housing Market Assessment (2017).

Furthermore, DCLG issued a consultation in November 2017 which included a proposed methodology for calculating housing need. This is based on three principles: simplicity, using publicly available data and producing realistic targets. The document applies this methodology to City of York and indicated a minimum of 1,070 dwellings per annum for the period 2016 to 2026.

Whilst we acknowledge that formal changes to the NPPF have not yet been incorporated by the Government, the revised NPPF is anticipated to be published this summer. As such, an increase in the supply of housing would place the Council in a better position for defending the Plan proposals through the Examination process. It is therefore considered that the draft Plan fails to conform with both existing and emerging national policy in respect of identifying and meeting its objectively assessed housing needs.

In addition, the proportion of the local authority area covered by Green Belt is high (at 82%). As such, the number of sites available to come forward outside this land designation is limited. As a consequence, it is considered that the Plan is not prepared positively and does not seek to a) identify a correctly assessed housing need, nor, b) allocate enough land to meet this need.

As we do not consider that enough sites have been identified to accommodate the correct amount of dwellings needed to ensure that the correct housing need is met during the Plan period, the Council, as a consequence, will not meet its economic growth ambitions as set out in the York Economic Strategy (2016).

We therefore propose additional sites are identified to accommodate future housing need and one site in particular which is considered appropriate to be identified as a housing allocation is our client's site off Foxwood Lane at Acomb. This site is under the joint ownership of the YDBF and the Hunt, and as such, both landowners support the future allocation of this site for residential development. A location Plan is appended (Appendix 1) for reference.

Notwithstanding the site specific comments, in accordance with Policy SS1, it is considered that the deletion of this site from the Green Belt and allocating it for housing would not adversely affect York's historic or natural environment; it is accessible to sustainable modes of transport and a range of local services and facilities; it would not lead to an unacceptable level of congestion or pollution; and the site is not subject to flood risk (from either rivers and the sea or surface water). In short, it is considered that the Council has previously assessed this site incorrectly. Please refer to our comments against Policy H1 for further detail regarding the sustainability and suitability of this site.

We cannot therefore support Policy SS1 until the entire Plan is amended to ensure that an OAHN is fully met. It is not considered that the Local Plan is NPPF compliant as the plan does not appear to be positively prepared. We therefore consider the Plan to be unsound on this basis.

YDBF and The Hunt are committed to working alongside the City of York Council to bring forward deliverable housing sites under their ownership. As such, we support the future allocation of our client's land identified at Appendix 1 to help meet the unmet housing need. Technical works supporting the allocation of this site for housing can be found at Appendix 2 and 3 and further technical work can be undertaken if deemed necessary by the Council.

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.

It is not considered that the City of York Council is proposing to submit a sound Local Plan particularly in respect of the proposed housing numbers set out in Policy 5S1 and associated housing allocations proposed at Policy H1.

We therefore request that the Council increase its housing numbers (to meet the OAHN) and, as part of this, seek to delete more land from the Green Belt and propose additional housing allocations to meet the unmet need.

To meet the outstanding need, we request that our clients site, 'Land off Foxwood Lane, Acomb' (please see appendix 1 for a site location plan), should be deleted from the Green Belt and allocated as a housing site. Please see our comments to Policy H1 for further detail which provides certainty and clarity as to the suitability and sustainability of the site for housing.

In line with this additional housing allocation, and to ensure that the Plan is succinct, the Key Diagram on page vi should be amended to include our clients site as a residential allocation deleted from the Green Belt.

Furthermore, the site off Foxwood Lane should be added to Table 5.1 of the Draft Plan as an additional housing allocation for circa 180 dwellings to meet the objectively assessed housing needs and demand.

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

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

Yes, I wish to appear at the examination

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

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

N/A

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

Part C - How we will use your Personal Information

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

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

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

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

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Retention of Information

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

Your rights

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

Signature

Date

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 29 Town and Country Planning (Local Planning) (England) Regulations 2012

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



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

OFFICE USE ONLY:

ID reference:

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

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

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

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

Part A - Personal Details

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

1. Personal Details		2. Agent's Details (if applicable)
Title		Mrs
First Name		Jennifer
Last Name		Longstaff
Organisation (where relevant)	York Diocesan Board of Finance & The York and Ainsty Hunt	Savills (UK) Limited
Representing (if applicable)		York Diocesan Board of Finance & The York and Ainsty Hunt
Address – line 1		Savills
Address – line 2		26 Coniscliffe Road
Address – line 3		Darlington
Address – line 4		
Address – line 5		
Postcode		DL3 7JX
E-mail Address		Jennifer.longstaff@savills.com
Telephone Number		01325 370516

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-KLIZ 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/act on 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 you want to raise)

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

City of York Local Plan Publication Draft	<input checked="" type="checkbox"/>
Policies Map	<input checked="" type="checkbox"/>
Sustainability Appraisal/Strategic Environmental Assessment	<input type="checkbox"/>

What does 'legally compliant' mean?

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

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

Yes No

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

Yes No

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

N/A

What does 'Sound' mean?

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

What makes a Local Plan "sound"?

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

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

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

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

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

 Yes No

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

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

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

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

(Complete any that apply)

Paragraph no.

Policy Ref

Site Ref

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

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

Savills, on behalf of the York Diocesan Board of Finance (YDBF) and The York and Ainsty Hunt (The Hunt) (the landowners), jointly submit the following representations to the City of York Local Plan Publication Draft 2018 Consultation.

City of York Council is preparing a new Local Plan for York, which covers the period from 2017 to 2032/33 with the exception of the Green Belt boundaries which will endure up to 2037/38. Its main function is to set out how much and where land should be provided to accommodate the new homes and jobs that are needed in the city. It should also facilitate new infrastructure to ensure that development is sustainable. This may include new transport measures, schools, shops, community facilities and public open space and sports facilities. The Local Plan should also protect and enhance the high quality natural and built environment and heritage of York.

As set out in our comments to Policy SS1 and Policy H1, it is not considered that the Plan has been prepared positively in respect of addressing the objectively assessed housing needs for the City. To meet the appropriate housing needs it is considered that further land need deleting from the Green Belt and allocated as housing sites.

YDBF and The Hunt are committed to working alongside the City of York Council to bring forward deliverable housing sites under their ownership. This representation is therefore made in respect of the following site which is under the joint ownership of the YDBF and the Hunt, and as such, would like to support the future allocation of this site for residential development:

- Land South of Foxwood Lane, Acomb (site location plan is included in Appendix 1).

The NPPF specifies that the Green Belt is of great importance in order to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. The NPPF is clear that "once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of a Local Plan" (NPPF, Para. 83). However, the NPPF is equally clear that "Local Plans should meet objectively assessed needs...unless specific policies...indicate development should be restricted" (NPPF, Para. 14). Given the commitment as part of the Local Plan process to review the Green Belt and the development requirements for the district, it is considered that exceptional circumstances apply.

Representations must be received by Wednesday 4 April 2018, up until midnight.

Representations received after this time will not be considered duly made.

As stated above, it is considered that further assessments should be made with regard to deleting land south of Foxwood Lane at Acomb from the Green Belt as allocated as a housing site to help meet the housing needs for the City in a sustainable and suitable location. This site does follow recognisable physical features that will endure the development (e.g. a hedgerow runs along the southern boundary of the site). This is particularly relevant as, at Paragraph 85, the National Planning Policy Framework (NPPF) states that, when defining boundaries, local planning authorities should – “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.

With regard to the proposed site for housing at Foxwood Lane, the site would result in defensible boundaries on all four sides as follows:

- By Foxwood Lane to the north;
- By residential dwellings on Stirrup Road to the east;
- By an existing field boundary / hedging to the south; and,
- By Askham Lane to the west

In addition, the amended site would have strong links to the urban area and is well contained, therefore eliminating potential for future urban sprawl. Please see our comments to Policy H1 in respect of the sustainability of the site and its proximity to a wide range of local services and facilities.

Ensuring sufficient land is deleted from the Green Belt is essential to ensure that there is a degree of permanence for the revised Green Belt boundary going beyond the Local Plan period whilst meeting the objectively assessed housing need identified as part of the Local Plan process.

Land south of Foxwood Lane, proposed for housing as part of this representation, is not considered to benefit the Green Belt, nor does it comply with the 5 purposes identified in the NPPF at paragraph 80 for identifying land to be designated as Green Belt. As such, we can confirm the following points in line with the NPPF (paragraph 80)

- Development of the site would not lead to the unrestricted sprawl of a large built up area based on the natural/physical boundaries of the site;
- Development of the site would not lead to neighbouring towns merging into one another;
- The site is not valuable countryside or utilised agricultural land;
- The site does not preserve the setting and special character of a historic town; and,
- The development of the site would help address the housing need and demand in the area without having an adverse impact on urban regeneration.

The future development of the site would create an attractive, vibrant and successful place, promoting a long term sustainable community and delivering quality housing in an area of high market demand. Additional housing choice is considered to be of huge benefit to local communities and to the district as a whole, helping to meet the local housing needs and demands during the plan period.

The scale of development is not considered to be detrimental to the existing infrastructure and landscape. Indeed, suitable additional reports, to supplement those already undertaken and provided as part of this submission (Appendix 2 and 3), could be prepared to address any issues should it be deemed necessary.

It should also be noted that, if a development on the site was brought forward, developer contributions would be required and these would provide further benefit to the local area.

In conclusion, it is proposed that the land identified in Appendix 1 should be deleted from the Green Belt and as such the Key Diagram be amended in accordance with this deletion.

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.

It is not considered that the City of York Council is proposing to submit a sound Local Plan particularly in respect of the proposed housing numbers identified in Policy S51 and the associated housing allocations proposed in Policy H1:

We therefore request that the Council increase its housing numbers (to meet the OAHN) and, as part of this, seek to delete more land from the Green Belt and propose additional housing allocations.

To meet the outstanding housing need, we request that our client's site, 'Land off Foxwood Lane, Acomb' (please see appendix 1 for a site location plan), should be deleted from the Green Belt and allocated as a housing site. Please see our comments to Policy H1 for further detail which provides certainty and clarity as to the suitability of the site for housing.

In line with this additional housing allocation, and to ensure that the Plan is succinct, the Key Diagram on page v) should be amended to include our clients site as a residential allocation deleted from the Green Belt.

Furthermore, the site off Foxwood Lane should be added to Table 5.1 of the Draft Plan as an additional housing allocation for circa 180 dwellings to meet appropriate housing needs and demand.

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

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

Yes, I wish to appear at the examination

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

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

N/A

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

Part C - How we will use your Personal Information

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Signature

Date

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17, 27, 35 & 35 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

KS444

City of York Council

05 APR 2018

RECEIVED

SID 839

Name: DELLA JOHNSON

Address [Redacted]

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

Dear City of York Council,

I am writing to provide my feedback and outline my support for the Local Plan Publication Draft 2018.

As a resident of York, I believe it is essential that we submit a plan that directly addresses the local pressures in our housing market, but at the same time, guarantees the protection of the greenbelt and York's natural beauty.

Overall, I judge that the City of York: Local Plan Publication Draft, Policies Map, Sustainability Appraisal and Strategic Environmental Assessment to be 'sound' documents. However, more specifically, I feel the following principles within the current draft of the Local Plan are crucial for the future development of York

- The plan gives good protection of York's Greenbelt, protecting our unique City.
- Given that population figures are predicted to be lower than estimated by the Government, the plan provides enough houses for the people of York.
- From delivering roughly 500 houses per annum, to nearly 1000 house per annum. I believe that through the housing delivered under the plan, affordability will be improved in York.

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

It is essential that the people of York retain control of this process and ultimately, decide on the future of York itself

Signature: [Redacted]

Date: 1/4/18

KS 445



City of York Council

05 APR 2018

RECEIVED

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

OFFICE USE ONLY: SID 840

ID reference:

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

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

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

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

Part A - Personal Details

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

1. Personal Details		2. Agent's Details (if applicable)
Title	Ms	
First Name	Wendy	
Last Name	Stewart	
Organisation (where relevant)		
Representing (if applicable)		
Address – line 1		
Address – line 2		
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		
E-mail Address		
Telephone Number		

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.

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

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

Do I need to attend the Public Examination?

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Where can I view the Local Plan Publication Consultation documents?

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

Not in Haxby

Part B - Your Representation

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



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

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment:

What does 'legally compliant' mean?

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

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

Yes

No

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

Yes

No

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

What does 'Sound' mean?

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

What makes a Local Plan "sound"?

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

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

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

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

Yes No

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

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

Positively prepared Justified
 Effective Consistent with national policy

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

(Complete any that apply)

Paragraph no.

Page 50

Policy Ref

SS 11

Site Ref.

ST9

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.

Air Quality

Page 50 of the 'City of York Local Plan - Publication Draft (February 2018)' outlines the key principles for the planning and delivery of 735 dwellings on The Land North of Haxby (ST9). Missing from these principles is the need for an **Air Quality Impact Assessment**.

However, Air Quality has frequently been raised as an issue by individual residents and organisations and recorded, as responses during consultation, by City of York Council. See the document 'Pre-Publication Draft Local Plan Regulation 18 Consultation Statement' for the responses to the last consultation, which ended in October 2017 - pages 63 to 72. Despite these responses Air Quality has not been included in the key principles for Haxby (ST9) in the Publication Draft.

The road network in Haxby/Wigginton is already overloaded, particularly at peak times, with long traffic queues in the morning, when children are walking or cycling to primary, junior and senior schools, exposed to vehicle emissions. The congested ring road (A1237) and level crossings cause further vehicle back up.

The proposed 735 new dwellings is 20% of the 3,700 present households in Haxby and 13.3% of the 5,400 present households in Haxby and Wigginton combined. Which could mean an increase respectively of 20% or 13.3% of vehicles on village roads, following completion of the development (assuming one car per household). Further effecting the respiratory health of children and older people.

As far as air quality is concerned. We mentioned this in our last response. Particularly with regard to traffic congestion and pollution. I believe we requested that an air quality assessment should be done, particularly in the mornings when there is considerable congestion with vehicle emissions putting our childrens' respiratory health at risk, when they are walking or cycling to school. This should then be considered with the increase in pollution that will result with a larger number of vehicles, once a further 735 houses are built. (a 20% increase for Haxby). It is not just about poor air quality in and around the development but the effect the development will have in the future in the village as a whole. This is covered as an issue to be considered in both the CYC documents and government policies and should be highlighted as an issue particular to Haxby.

It is interesting to note, on looking at the CYC 'Regulation 18 consultation statement', that the developer requested removal of the reference to an Usher Lane/Towthorpe Rd access!!!

Government policy states that 'the Local Plan may need to consider ways in which new development would be appropriate in locations where air quality is or likely to be a concern and not give rise to unacceptable risks from pollution'.

Haxby has already been overdeveloped with a conservation area at its centre which cannot be expanded to cope with extra traffic and parking and will lose its village character with a 20% increase in dwellings.

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



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

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

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

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

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

Yes, I wish to appear at the examination

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

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

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Part C - How we will use your Personal Information

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Retention of Information

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Signature



Date

31st March 2018

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

OFFICE USE ONLY:

ID reference:

SID 840

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

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

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

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

Part A - Personal Details

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

1. Personal Details		2. Agent's Details (if applicable)
Title	Ms	
First Name	Wendy	
Last Name	Stewart	
Organisation (where relevant)		
Representing (if applicable)		
Address – line 1		
Address – line 2		
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		
E-mail Address		
Telephone Number		

Guidance note

Where do I send my completed form?

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

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

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Do I need to attend the Public Examination?

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Part B - Your Representation

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



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

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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

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

Yes

No

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

Yes

No

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

What does 'Sound' mean?

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

What makes a Local Plan "sound"?

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

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

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

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

Yes No

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

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

Positively prepared Justified
 Effective Consistent with national policy

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

(Complete any that apply)

Paragraph no. Policy Ref. Site Ref.

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

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

Health Needs not mentioned

if/when development goes ahead it will be over a period of time which will gradually stretch resources, which are at present working to full capacity.

unless provisions are made prior to building started the community will struggle. As will happen with education - children will have to travel out of area.

NB Health is not only funding buildings

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



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Signature



Date

31 March 2018

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

OFFICE USE ONLY:

ID reference:

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Part A - Personal Details

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

1. Personal Details		2. Agent's Details (if applicable)
Title	Ms	
First Name	JENNIFER	
Last Name	JENNIFER HUBBARD	
Organisation (where relevant)	JENNIFER HUBBARD BA(Hons) TOWN & COUNTRY PLANNING	
Representing (if applicable)	TOWN PLANNING CONSULTANT	
Address – line 1	ALLONBY HOUSE	
Address – line 2	YORK ROAD	
Address – line 3	NORTH DUFFIELD	
Address – line 4	SELBY	
Address – line 5		
Postcode	YO8 5RU	
E-mail Address	planning@jenniferhubbard.co.uk	
Telephone Number	01757 288291	

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

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



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

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Yes

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)

See response to Q.5.(4)

What does 'Sound' mean?

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

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

Yes No

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

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

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

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

(Complete any that apply)

Paragraph no.

Policy Ref.

Policies EC5, GB1 & GB3

Site Ref.

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

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

Policy EC5 purports to support the rural economy. However, since most of the rural areas of York lie within the general extent of the green belt set by saved Regional Spatial Strategy policy, there is little or no opportunity under Policy GB1 as currently drafted for rural businesses which are not allied to agriculture or forestry to establish or expand unless very special circumstances can be demonstrated.

The outcome of these policies taken together is that, other than agricultural or forestry development, development which is permitted development or which can show very special circumstances, all potential rural developments will need to seek locations beyond the outer edge of the green belt - that is, in neighbouring authorities. The prospect appears not to have been raised under Duty to Cooperate discussions/arrangements with surrounding Authorities .

Policy GB1 should recognise the constraints which the green belt places on the aspirations and objectives of Policy EC5.

There is no justification for Criterion (vii) of Policy GB3 which is inconsistent with national (NPPF) policy and does not reflect Class Q permitted development regulations which permit the conversion of agricultural buildings to dwellings – subject, of course, to criteria, but the criteria do not include close proximity to a settlement.

Policy EC5 is supported but, as noted above, it is inconsistent with GB1 and GB3 and without amendment to these 2 green belt policies, Policy EC5 is of no effect.

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Policy GB1 should include “other development that requires a rural location” – or similar wording.

Criterion (vii) of Policy GB3 should be deleted.

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

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

Yes, I wish to appear at the examination

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

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See attached sheet headed Response to Q.7(2)

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

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Signature

Date

04.04.2018

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

CITY OF YORK PUBLICATION DRAFT LOCAL PLAN 2018

The soundness of the Publication draft local Plan: The plan is not sound for the following reasons:

The Plan is not positively prepared

The Plan does not provide an evidence-based spatial strategy for the City but (and this needs to be stated plainly) is the planning equivalent of a camel – that is, a horse designed by a Committee: in this case, a plan which is an amalgamation of sites and policies which offer the least resistance to the Council and which the Council considers least likely to generate opposition from members of the public. That is to say, it is a plan contrived to achieve an outcome which is not planning-lead.

The Plan in its current form was endorsed by the Council's Executive on 25th January 2018 following a decision and recommendation of the Local Plan Working Group on the previous Tuesday not to accept the Council's own consultants' estimate of the city's housing requirement for the Plan period – the consultants' estimate itself being significantly below the housing requirement resulting from the application of the Government's draft Standard methodology for calculating the Objectively Assessed (housing) Need (OAN).

It is accepted that under the transitional arrangements the Standard methodology may not be applicable to York: nevertheless it is difficult to envisage that the Examination Inspector will take no account of the results of applying the methodology merely because the draft Plan reaches examination before the revision of NPPF comes into effect.

The housing requirement promoted by the Council or as assessed by its consultants or based on the Standard methodology has varied through the current plan process from 840 dpa, to 1,070 dpa (applying the standard methodology) with the figure endorsed by the Executive and now incorporated into the draft plan set at 867 dpa.

The Council has not produced any evidence to substantiate this figure. Nor is there any evidence or justification – other than an obvious desire not to make further incursions into the Council's preferred tight inner green belt boundary – for the significant increases in the

density of development on some of the allocated housing sites latterly recommended to (but rejected by) the Executive in January 2018.

It is noteworthy that before the Executive endorsed the Plan in its current form as a basis for consultation, it heard representations from the promoters of two of the largest proposed housing allocations (Sites ST14 and ST15) and from a representative of the Chamber of Trade each of whom warned that a Plan based on the reduced housing figures would be found to be unsound: also, in respect of the two proposed housing allocations, Sites ST14 and 15, the development would be unviable and hence undeliverable if the areas and/or the capacities of the sites were reduced.

These events clearly demonstrate a plan based on extraneous considerations unsupported by evidence.

The Plan is not justified

The Agent preparing these submissions has contributed by way of documentation and first-hand knowledge to submissions prepared by George Wright MA MRTPI dealing with the history of York Green Belt. Mr Wright concludes that the green belt boundaries as proposed in the PDLP cannot be justified by reference to national guidance set out not only in various PPG publications and the NPPF but also in repeated advice and instructions emanating from a succession of Ministers of different political persuasions. His conclusions are adopted, rather than repeated in these submissions, *specifically* the conclusions that the evidence points to a need, in identifying sites for development, to look first to land on the periphery of the built-up areas of York. Mr Wright concludes there is sufficient land suitable and available for development in such locations to meet York's development needs for several generations without harming the character or setting of York. Only if no such land were available, should sites be sought as a second choice beyond the "about 6 mile wide" green belt. The approach to the definition of green belt boundaries, accordingly, is not justified.

In relation to housing requirements, by determining housing allocations in the PDLP *not* by reference to OAN (as described above), the Council itself has demonstrated that the plan provisions are not justified.

The Plan is not effective

As described above, the plan does not propose to meet the objectively assessed housing needs and on that single ground alone, the plan cannot be effective.

The unsoundness in relation to meeting the housing requirement is compounded by concentrating provision in a small number of very large allocations, principally the ST (Strategic) allocations.

Even a cursory review of Tab. 1.5 of the Plan (Housing Allocations) demonstrates that the estimated housing delivery in years 1-5 of the plan period is expected to be only half of the requirement for a single year leaving at least 4½ years' requirement (or over 3,500 dwellings) to be delivered from sites estimated to be delivered in years 1 to 10 or from the very large sites which are expected to continue developing throughout or well beyond the plan period. The lead time before construction for sites without planning permission is historically underestimated – and significantly so – by most LPAs, including York. The lack of small and medium sized sites suitable and available for residential development in the early years of the Local Plan will further reduce the effectiveness of the plan.

The Plan is not consistent with national policy

Self-evidently, based on Council's acknowledged approach to housing requirements, the plan is not consistent with national policy.

In relation to green belt boundaries, again, we refer to and rely on the submissions of George Wright.

Although not yet formally government policy, there is a clear intention in the draft revised NPPF (para 69) that a significant percentage of sites for residential development should be no larger than 0.5 ha, to encourage housebuilding and support small and medium sized builders. This is not addressed in the draft plan.

In conclusion

The plan on its face is fundamentally flawed to the extent that the Council is urged not to proceed to submission and Examination without fundamentally reconsidering housing allocations and its unjustified insistence on defining a tight inner boundary to the green belt.

RESPONSE TO QUESTION 7. (2)

I have participated actively in York's various attempts to promote a Local Plan through to adoption on behalf of numerous Clients since the late 1980s/early 1990s. I have detailed knowledge of the circumstances leading up to the current process, in particular the Council's varying approaches to the City's housing requirement and to the determination of green belt boundaries. A number of sites/locations in which I have been involved previously are now the subject of options or conditional contracts in favour of housebuilders and developers who are pursuing their individual representations. The options/conditional contracts were in the main entered into when developers were advised by a previous Administration that detailed planning applications should be prepared in readiness for early submission at a date to be advised by the then Leader of the Council, well in advance of the adoption of the Plan.

That was some 5 years ago. Many hundreds of thousands of pounds have been expended by prospective developers in preparing these applications. The Spatial "Strategy" of the PDLP produced under a different Administration is significantly different from that promoted previously and it is understandable that developers will now be protecting their interests in their responses to the PDLP. The owners/promoters of the smaller potential development sites often do not have the benefit of such representations but a large number of small and medium sized housing sites are essential to ensure housing delivery. A (relatively) impartial overview of how the PDLP emerged in its current form may assist the Examination.

05 APR 2018

KS 4147



8/4/18

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

OFFICE USE ONLY: SID 842
Reference

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

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Please 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	PETER	
Last Name	EAVES	
Organisation (where relevant)		
Representing (if applicable)		
Address - line 1	[REDACTED]	
Address - line 2	[REDACTED]	
Address - line 3	[REDACTED]	
Address - line 4	[REDACTED]	
Address - line 5	[REDACTED]	
Postcode	[REDACTED]	
E-mail Address	[REDACTED]	
Telephone Number	[REDACTED]	

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

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 requirements: 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)

INsofar & INasmuch as THE PLAN RESPECTS THE REGULATIONS CONCERNING ORCHARD-BELT PROTECTION IN THE AREA BETWEEN MOOR LANG & ASKHAM BOG, SITE OF SPECIAL SCIENTIFIC INTEREST, I SUPPOSE IT IS LEGALLY COMPLIANT. CONSULTATION HAS BEEN ADEQUATE.

What does 'Sound' mean?

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

What makes a Local Plan "sound"?

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

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

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

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

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

Yes No

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

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

Positively prepared Justified
 Effective Consistent with national policy

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

(Complete any that apply)

Paragraph no

Policy Ref.

Site Ref.

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

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

I DO NOT THINK THAT THE PLAN IS JUSTIFIED IN THAT IT IS NOT THE MOST APPROPRIATE STRATEGY WHEN CONSIDERED AGAINST THE REASONABLE ALTERNATIVES INCLUDING ALTERNATIVE PLANS FOR HOUSING-DEVELOPMENTS IN "NEW-TOWNS" eg BETWEEN GREEN HAMMERTON AND YORK.

YORK'S POPULATION HAS DOUBLED FROM 100,000 TO 200,000 IN THE LAST 50 YEARS YET THE INFRASTRUCTURE IS THE SAME - THE ROAD SYSTEM, THE SEWERS ETC ARE STRETCHED TO BREAKING POINT.

I BELIEVE GERMANBY-BECK SHOULD NOT HAVE BEEN APPROVED. FULLFORD ROAD IS ALREADY PRACTICALLY GRID-LOCKED ALL DAY, EVEN BROWNFIELD SITES LIKE THE SUGAR BEET FACTORY & ROWNTREE COGDA WORKS WILL BRING THOUSANDS OF MORE HOUSES. IN A MEDIEVAL CITY FULL OF NOTEWORTHY BUILDINGS THERE SEEMS NO SCOPE FOR BUILDING NEW ROADS OR EVEN WIDENING EXISTING ROADS.

WHAT POSSIBLE JUSTIFICATION CAN EXIST FOR ANY PLAN TO BUILD THOUSANDS OF NEW HOUSES ENDLESSLY??

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.

I REFER TO MY ANSWERS IN 5(a)

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

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



Yes, I wish to appear at the examination

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

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

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

Part C - How we will use your Personal Information

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

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

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

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

Storing your information and contacting you in the future:

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Retention of Information

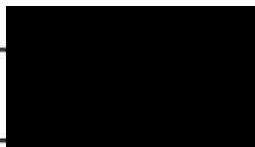
We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely. The Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local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

Your rights

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Signature



Date

03/04/2018

¹ Section 20(2) 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

05 APR 2018



City of York Council

05 APR 2018

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OFFICE USE ONLY:

ID reference:

SID 843

KS448

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

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

Part A - Personal Details

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

1. Personal Details		2. Agent's Details (if applicable)
Title	MRS	
First Name	JANNE	
Last Name	GRANDER	
Organisation (where relevant)		
Representing (if applicable)		
Address - line 1		
Address - line 2		
Address - line 3		
Address - line 4		
Address - line 5		
Postcode		
E-mail Address		
Telephone Number		

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

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Do I need to attend the Public Examination?

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Part B - Your Representation

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



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

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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

Yes

No

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

Yes

No

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

With regard to ST9 land north of Haxby Proposed 7'ss new houses!
1. Existing houses already built in Haxby, have been built over original existing Ponds, Ditches and Marshland! Therefore the water table is high,

Building New houses will only exaggerate the problems we already have! When it rains, the houses in Crocklands Lane have sewage backing up into their houses.

2. Haxby + Wigginton hasn't enough green spaces, schools, Medical centre is full to capacity

3. Traffic - Congestion every day - nowhere to park - grid locked area, grid locked area Vicker Lane, York Rd. Eastfield Avenue, Wigginton Rd. ST9 is overcrowded already, building in this area will cause more problems for residents + pollution.

What does 'Sound' mean?

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

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

Yes

No

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

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

Positively prepared

Justified

Effective

Consistent with
national policy

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

(Complete any that apply)

Paragraph
no.

Policy
Ref.

Site Ref.

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

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

Same reasons as stated in 4.(3)

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

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

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To ease the heavily congested area of Haxby and Wigginton the A1237 needs to be dual carriageway and flyovers at Haxby level crossing and Wigginton Road so traffic flow would be improved.

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

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



Yes, I wish to appear at the examination



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

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

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Signature



Date

27/03/2018

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

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

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

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

OFFICE USE ONLY

reference

SID 844

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Part A - Personal Details

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

1. Personal Details		2. Agent's Details (if applicable)
Title	Mrs	
First Name	DINNE	
Last Name	STONDS (formerly Greenham Hill)	
Organisation (where relevant)		
Representing (if applicable)	COPMUNGE & BIRKBECK CONSULTING PLANNING GROUP	
Address - line 1	215 COCKSHILL	
Address - line 2	MILL LANE	
Address - line 3	BRIMHAM RICHARD	
Address - line 4	YORK	
Address - line 5		
Postcode	YO23 3NW	
E-mail Address	Copmunge@gmail.com	
Telephone Number	01904 801822	

Guidance note

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Do I need to attend the Public Examination?

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Part B - Your Representation

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



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

- City of York Local Plan Publication Draft
- Policies Map
- Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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

Yes No

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

Yes No

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

In respect of all the documents referred to in Section 3 above, I support and agree with City of York Council's processes, procedures, and justifications and I am satisfied that all documents are legally compliant. I would prefer, however, that the housing densities identified for the two development sites in Copmanthorpe, which are substantially greater than the current average density for the village and which would result in the overwhelming of already stretched infrastructure and services, be reduced to the densities detailed in Policy CNP2 of the draft Neighbourhood Plan.

What does 'Sound' mean?

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

What makes a Local Plan "sound"?

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

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

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

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

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

Yes No

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

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

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

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

(Complete any that apply)

Paragraph no

Policy Ref

Site Ref.

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

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

'In respect of all the documents referred to in Section 3 above, I support and agree with City of York Council's processes, procedures, and justifications and I am satisfied that all documents meet all the tests of soundness'. I would prefer, however, that the housing densities identified for the two development sites in Copmanthorpe, which are substantially greater than the current average density for the village and which would result in the overwhelming of already stretched infrastructure and services, be reduced to the densities detailed in Policy CNP2 of the draft Neighbourhood Plan.

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

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

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

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

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

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

Yes, I wish to appear at the examination

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

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

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

Part C - How we will use your Personal Information

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

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

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

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

Storing your information and contacting you in the future:

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

Retention of Information

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

Your rights

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

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

Signature

Date

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

² Regulation 10 Town and Country Planning (Local Planning) England Regulations 2012

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

Name: *J. M. ASNEW*
 Address: [REDACTED]

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

Dear City of York Council,

I am writing to provide my feedback and outline my support for the Local Plan Publication Draft 2018

As a resident of York, I believe it is essential that we submit a plan that directly addresses the local pressures in our housing market, but at the same time, guarantees the protection of the greenbelt and York's natural beauty.

Overall, I judge that the City of York: Local Plan Publication Draft, Policies Map, Sustainability Appraisal and Strategic Environmental Assessment to be 'sound' documents. However, more specifically, I feel the following principles within the current draft of the Local Plan are crucial for the future development of York.

- The plan gives good protection of York's Greenbelt, protecting our unique City.
- Given that population figures are predicted to be lower than estimated by the Government, the plan provides enough houses for the people of York.
- From delivering roughly 500 houses per annum, to nearly 1000 house per annum. I believe that through the housing delivered under the plan, affordability will be improved in York.

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

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

Signature: [REDACTED]

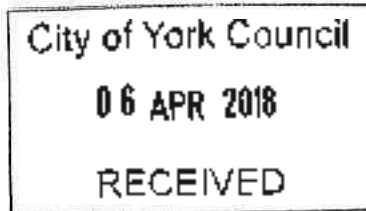
Date: [REDACTED]

2/4/18

City of York Council
 06 APR 2018
 RECEIVED

KS451

SID 846



Name:
Address

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

Dear City of York Council,

I am writing to provide my feedback and outline my support for the Local Plan Publication Draft 2018.

As a resident of York, I believe it is essential that we submit a plan that directly addresses the local pressures in our housing market, but at the same time guarantees the protection of the greenbelt and York's natural beauty.

Overall, I judge that the City of York, Local Plan Publication Draft, Policies Map, Sustainability Appraisal and Strategic Environmental Assessment to be 'sound' documents. However, more specifically, I feel the following principles within the current draft of the Local Plan are crucial for the future development of York.

- The plan gives good protection of York's Greenbelt, protecting our unique City.
- Given that population figures are predicted to be lower than estimated by the Government, the plan provides enough houses for the people of York.
- From delivering roughly 500 houses per annum, to nearly 1000 house per annum, I believe that through the housing delivered under the plan, affordability will be improved in York.

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

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

Signature:

Date:

1/4/18

KS452



City of York Council
06 APR 2018

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

OFFICE USE ONLY: RECEIVED
ID reference: SID 847

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	Luke (LUKE)	
Last Name	Condon (CONDON)	
Organisation (where relevant)		
Representing (if applicable)		
Address - line 1	[REDACTED]	
Address - line 2		
Address - line 3		
Address - line 4		
Address - line 5		
Postcode		
E-mail Address		
Telephone Number		

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

Guidance note

Where do I send my completed form?

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

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

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

What can I make comments on?

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

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each representation you wish to make** (topic or issue you wish to comment on). You can attach additional evidence 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

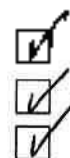
(Please use a separate Part B form for each issue to you want to raise)

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)

I consider all documents comprising the draft local plan to be legally compliant. In respect of all the documents referred to in Section 3 above, I support and agree with City of York Council's processes, procedures, and justifications and I am satisfied that all documents are legally compliant.

What does 'Sound' mean?

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

What makes a Local Plan "sound"?

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

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

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

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

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

Yes No

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

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

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

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

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	<input type="text"/>	Site Ref.	<input type="text"/>
------------------	----------------------	----------------	----------------------	-----------	----------------------

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.

I consider all documents comprising the draft local plan to be sound. In respect of the documents referred to in Section 3 above, I support and agree with City of York Council's processes, procedures, and justifications and I am satisfied that all documents meet all the tests of soundness.

I believe the draft local plan strikes the right balance between providing the homes and jobs York needs, whilst also protecting the Green Belt, preserving the unique character and setting of York, and maintaining the amenity, sustainability, and resilience of Copmanthorpe, the community in which I live.

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

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

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

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

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

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

Yes. I wish to appear at the examination

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

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

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Storing your information and contacting you in the future:

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

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Your rights

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

Signature

[Redacted Signature]

Date

30/3/18

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

From: Gen Kenington [gen@johnsonmowat.co.uk]
Sent: 19 April 2018 15:13
To: localplan@york.gov.uk
Subject: York Local Plan Publication Draft - Consultation response on behalf of Avant Homes - Land north of A59 Boroughbridge Road/Roman Road, Poppleton
Attachments: Avant Comments Form.pdf; City of York Local Plan Publication Draft consultation response - Avant Homes.pdf

Dear Sir or Madam,

Please find attached a completed response form and representation document to the York Local Plan Publication Draft in relation to land to the north of A59 Boroughbridge Road/Roman Road, Poppleton. The submission is made on behalf of Avant Homes.

Please could you acknowledge receipt of the attachments.

Kind regards

Gen Kenington (Née Berridge)

MTP MRTPI

Associate Director

Johnson Mowat

Planning & Development Consultants

Coronet House, Queen Street, Leeds, LS1 2TW

T: 0113 887 0120 W: www.johnsonmowat.co.uk

Please consider the environment before printing this email. This email and any files transmitted with it are confidential and may contain privileged information intended solely for the use of the addressee. If you are not the intended recipient you are hereby notified that any dissemination of this communication is strictly prohibited. If you are not the intended recipient, please advise the sender immediately by return email, or contact our office on 0113 887 0120 and delete this message from your system. As this message has been transmitted over a public network Johnson Mowat cannot guarantee its accuracy or completeness. If you suspect that the message may have been intercepted or amended, please contact the sender.

Johnson Mowat, Coronet House, Queen Street, Leeds, West Yorkshire LS1 2TW

Registered in England Nos: OC407525

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		Mark
Last Name		Johnson
Organisation (where relevant)	Avant Homes	Johnson Mowat
Representing (if applicable)		
Address – line 1	c/o Johnson Mowat	Coronet House
Address – line 2		Queen Street
Address – line 3		Leeds
Address – line 4		
Address – line 5		
Postcode		LS1 2TW
E-mail Address		mark@johnsonmowat.co.uk
Telephone Number		0113 887 0120

Guidance note

Where do I send my completed form?

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

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

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

What can I make comments on?

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

Do I have to use the response form?

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

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

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

Do I need to attend the Public Examination?

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

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

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

Part B - Your Representation

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



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

- City of York Local Plan Publication Draft
- Policies Map
- Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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

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

Yes No

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

Yes No

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

What does 'Sound' mean?

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

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

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

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

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

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

5.(2) Please tell us which tests of soundness the document fails to meet: (tick all that apply)Positively prepared Justified Effective Consistent with national policy **5.(3) If you are making comments on whether the document is unsound, to which part of the document do they relate?**

(Complete any that apply)

Paragraph

Policy

Various

Site Ref.

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

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

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

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

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

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

See attached statement and appendices

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

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

Yes, I wish to appear at the Examination X

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

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

To have the opportunity to present the case in support of the land to the north of A59 Boroughbridge Road/Roman Road, Poppleton as well as engage in the debate in relation to the housing provision and other draft policies.

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



Part C - How we will use your Personal Information

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

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

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

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Signature

Date

4th April 2018

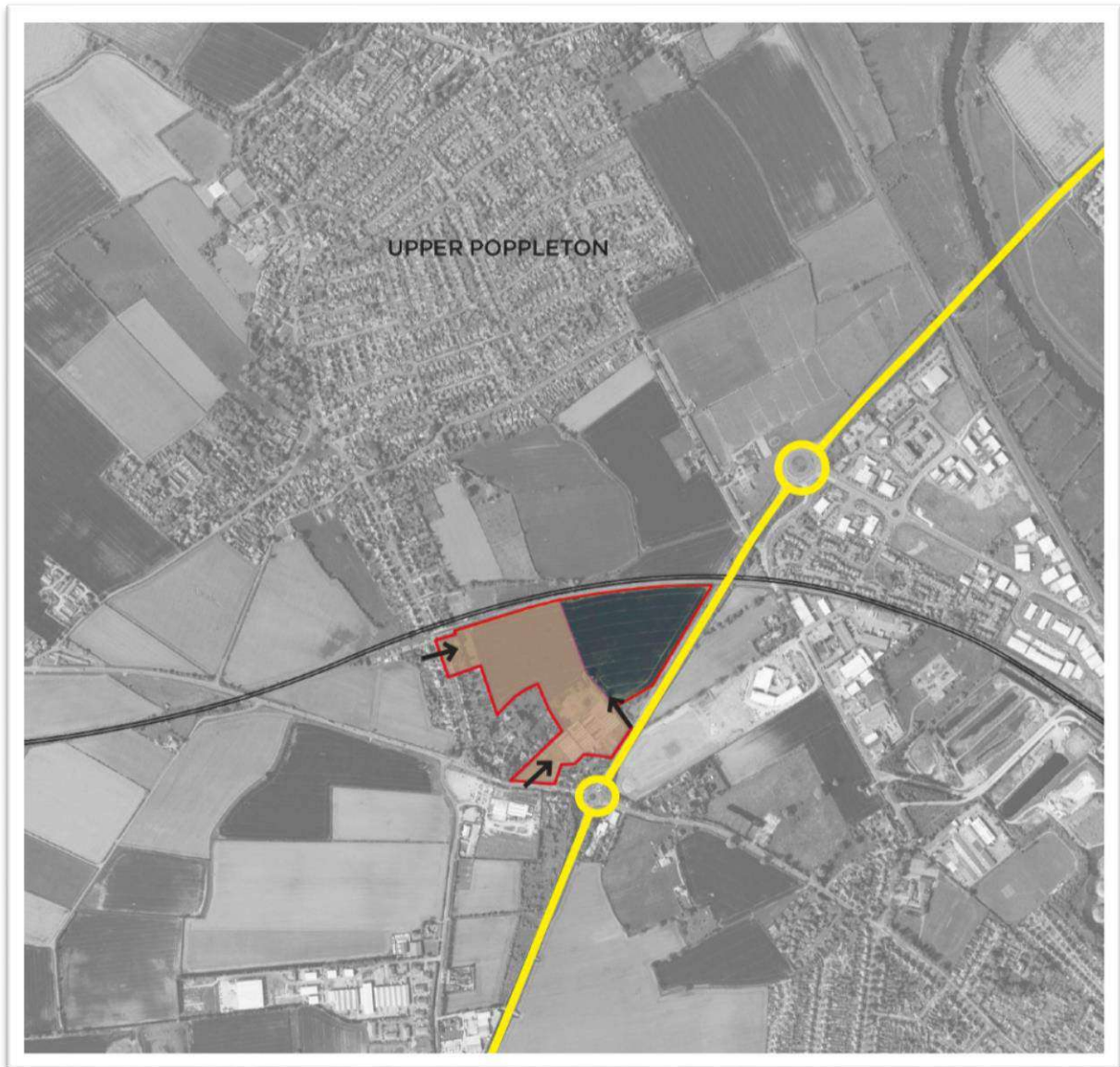
¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

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

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



JohnsonMowat
Planning & Development Consultants



**CITY OF YORK LOCAL PLAN
PUBLICATION DRAFT (Regulation 19) CONSULTATION**

LAND NORTH OF A59 AND WEST OF A1237, POPPLETON

**On Behalf of Avant Homes
April 2018**



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1.0 INTRODUCTION

- 1.1 Johnson Mowat have prepared this response to the City of York Local Plan Publication Draft consultation on behalf of our client Avant Homes.
- 1.2 The purpose of our response is to comment upon the Publication Draft document in relation to housing and other policies that impact upon housing delivery.
- 1.3 Forming part of our response, we also wish to promote a site on land north of the A59 Roman Road / Boroughbridge Road, west of the A1237, and immediately east of properties on Station Road, Poppleton, which we consider should be included within the Local Plan as a housing allocation (the front cover highlights the extent of the site in red, however it is the intention to retain the eastern triangular portion of the site as open land in perpetuity). An indicative framework for this site is shown on a plan at Appendix 1, which will result in a well contained sustainable housing development with a logical and defensible boundary.
- 1.4 National planning policy sets clear expectations as to how a Local Plan must be prepared in order to be justified, effective, consistent with national policy and positively prepared to deliver sustainable development that meets local needs and national priorities. We consider that the Publication Draft as currently drafted fails to meet these four tests of soundness.
- 1.5 The four tests of soundness are discussed below:-
- **Positively Prepared** – the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
- 1.6 Our major concerns with the document as currently drafted are summarised as follows:



1. The document does not adequately present the correct Objective Assessment of Housing Need [OAHN] which flows from the evidence base and does not accord with guidance set out in the National Planning Policy Framework [Framework] and Planning Practice Guidance [Practice Guidance].
 2. The Council delivery of sites fails to deliver the right housing in the right location across the plan period to 2038 such that an appropriate Green Belt boundary can be established.
- 1.7 In the context of the above, it is not possible to consider the suitability of the portfolio of sites set out as it is neither sound nor effective and has not been positively prepared. The City of York's unmet housing need has not been addressed and it is therefore not consistent with national policy which requires that Local Planning Authorities ensure that Local Plans meet the full, objectively assessed needs in the housing market area.
- 1.8 In producing this response, we are mindful of the housing requirement work undertaken by Lichfields in October 2017 and updated in March 2018 and are supportive of its findings that conclude the housing requirement for the plan period should be at least 1,150 dwellings per annum.
- 1.9 In producing this response, we are aware of the September 2017 DCLG Housing Methodology 'Planning for the right homes in the right places' paper and the Draft NPPF and Draft Planning Practice Guidance. The standard methodology in the DCLG 'Planning for the right homes in the right places' paper calculates a baseline housing need figure for York of 1,070 dwellings per annum. It is clear the housing number for York in that document (even without employment growth) informs of an annual housing requirement significantly above that within this Publication Draft Local Plan.



2.0 SITE SPECIFIC REMARKS

- 2.1 On behalf of our clients Avant Homes, we object to the proposed retention of the partially brownfield land to the north of the A59 within the Green Belt, and consider that the site is an appropriate site for designation as a housing allocation.
- 2.2 The site north of Boroughbridge Road, Poppleton would yield a capacity of circa 200 dwellings, which would include the provision of 30% affordable housing and a substantial area of protected open greenspace (see Framework Masterplan at Appendix 1).
- 2.3 The development of the proposed site at Poppleton will deliver a number of benefits including the provision of a new car park to serve the Poppleton Railway Station. The provision of a car park will have numerous benefits to the locality including:-
- Creation of additional car parking capacity at Poppleton railway station, addressing the current limited parking facilities as well as the increase in demand for spaces once the line is increased in 2019;
 - Remove the issue of on street parking on Station Road and enhancing the amenity for the existing residents of Poppleton;
 - New car park set to provide a buffer between the proposed 200 dwelling scheme and the railway line.
 - Opportunity to utilise land adjacent to the car park, which was a former coal yard, for uses such as retail or community uses as the station expands.
- 2.4 In addition to a new car park, along with retail or community facilities, the proposal will also deliver an upgrade to the level crossing. The railway line from Harrogate to York is due to be electrified and the frequency of trains increased. However, it is our understanding Network Rail has not secured funding to upgrade the level crossing at Poppleton despite it forming part of the plan to facilitate the increased frequency and speed of trains along this section of the line. The proposal therefore intends to fund the upgrade which will be of considerable benefit to residents of Poppleton.
- 2.5 The triangular farm land located between the railway line to the north and west of the A1237 is expected to remain in the Green Belt. In light of this, a planting scheme is proposed ensuring the land remains open in perpetuity and continues to provide an open aspect to this part of Poppleton. It also offers the benefit of screening the A59/A1237. In addition, this land is



expected to be utilised as a means of accommodating a SUDS to reduce the impact of drainage on this site as well as ensuring the current run off rates to the drainage dykes meet with current requirements.

- 2.6 On the topic of transport and connectivity and forming part of the proposals for this site will be the provision of direct transport links for rail, cycle, bus (park and ride) and pedestrian footways. The provision of these facilities will make this site one of the most accessible in York due to the facilities on offer as well as the proximity of the site to these various forms of public transport. It should be noted that the Poppleton Park and Ride has received planning permission to extend the existing facility from 600 spaces to 1,250 spaces, which will further improve the sustainability of the site, given its proximity.
- 2.7 The proposed site to the north of the A59 Boroughbridge Road / Roman Road in Poppleton is suitable, available and deliverable and the development of up to 200 new homes will assist the Council in meeting their future housing need. The area of land promoted in this submission has no technical constraints that cannot be overcome through design and suitable mitigation. There are obvious and substantial social and economic benefits that would flow from its allocation.



3.0 GENERAL POLICY REMARKS

Plan Period 2033 or 2038?

3.1 Under the sub-heading 'About the Plan' para i) informs the Local Plan Period runs from 2017 to 2032/33 with the exception of Green Belt boundaries which will endure to 2037/38. The text require clarification. Points to note are:-

- The Plan Period should be 1st April 2017 to 31st March 2038. This would remove any confusion.
- The housing allocations only partly extend beyond 2033, significantly tailing off after that date such that the five year period 2033 to 2038 only delivers half the housing requirement in those years - even then, delivering from no more than 3 known sites and windfall. Given there is no Safeguarded Land in the Plan, it is clear the Plan fails to justify the 2038 end date with the allocations as presented in Trajectory (Figure 5.1) demonstrating those shortcomings.

Jobs Growth

3.2 Paras 1.34 and 4.2 both make reference to the jobs growth forecast although para 4.2 makes reference to an additional forecast from Experian. It is now unclear as to which forecast has been used and how these relate to the Leeds City Region work and Northern Powerhouse. It is also unclear as to which methodology has been used to calculate the housing requirement.

Housing

3.3 While we support the reference to the 'notable affordable housing need' and increasing affordability concerns in the City in para 1.46, it is clear this recognition has not been taken forward into the housing requirement number that will be used to help resolve these problems.

Provide Good Quality Homes and Opportunities

3.4 Para 2.5 informs that 'By the end of the plan period sufficient sites will have been identified for viable and deliverable house sites ...'. This needs rewording to inform these sites are to be identified now, at the start of the plan period. This para also needs to be clear over the plan



period, that being up to 31 March 2038. The quantum of housing referenced in this para at 867 dwellings per annum is also at odds with that referenced in Trajectory Table 5.2 which seeks to make good the early years (2012 to 2017) shortfall and adds back a further 56 dwellings per annum up to 31 March 2033. As such, the requirement for 1st April 2017 to 31st March 2033 is 923 per annum. For the avoidance of doubt, we don't accept that figure but if the Council are to continue with 867, it should at least be referenced correctly.

Policy DP3: Sustainable Communities

- 3.5 While we have no overall objection to Policy DP3, the wording in 'iv)' needs to be amended from 'highest standards' to 'high standards'. There will be cost constraints to having to seek the very highest standards of embedded sustainability which may ultimately be weighed against delivering other benefits such as affordable housing.

Policy SS1: Delivering Sustainable Growth for York

- 3.6 As drafted, Policy SS1 wrongly references the housing number for the Plan Period and seeks a housing number that is not supported by the evidence base or the Sustainability Appraisal (SA). SS1 contains a lower than required housing number and is therefore unsound for the following reasons:-

- Not positively prepared – housing requirement is too low, the 867 dpa will act as a brake on economic growth and harm the delivery of affordable housing.
- Not justified – the evidence base and SA supports a higher figure.
- Not effective – the housing fails to deliver the full requirement and fails to align with the Plan Period for the Green Belt boundaries up to 2038.
- Not conforming with National Policy – it fails to carry forward the guidance in NPPG (para ID 2a 002 onwards).

- 3.7 Furthermore, the policy seems to suggest that brownfield/PDL will be phased ahead of greenfield sites. While this approach is inconsistent with the balanced approach taken in the Framework, it is also unclear as to how this would work in reality given the allocations in this York Local Plan are all released in a single phase.



Para 3.3 Housing Growth

- 3.8 This paragraph needs to be aligned with Table 5.2 in the Plan and recognise the fact that the shortfall since 2012 has been rolled into the new Plan Period commencing 2017. The introduction text in the Plan states the Plan Period commences 2017. If that is the case the housing requirement is $867+56 = 923$ as per the trajectory table.

Objectively Assessed Housing Need

- 3.9 As stated above, we are concerned the Council has taken a political route in selecting the lowest possible housing number available. The 'Political' influence is clear from the Introduction text to the September 2017 SHMA Update. The 2017 SHMA Update is essentially the GL Hearn May 2017 update that suggests an OAN for the period 2012 to 2032 of 867 dwellings plus a 10% uplift to address affordability concerns. GL Hearn therefore advise of an OAN of 953 (excluding the shortfall 2012-17).
- 3.10 In advising the 953 dpa figure, the 2017 SHMA report states the 867 dpa figure "would not however address the City's affordability issues." (May 2017 SHMA Para 5.)
- 3.11 The Council's 2018 Sustainability Appraisal Appendix N provides for a comparison appraisal of the 867 and 953 dpa figures and the DCLG OAN Methodology figure of 1,070. While the 953 dpa figure scores no worse against the 15 SA Objectives to the Council's preferred 867 figure, it does in fact score better under objectives 1, 4 and 5. The assessment under SA Objective 1 (meeting the diverse housing needs of the population in a sustainable way) scores a negative long term score when considering the 867 dpa figure and a double positive for the 953. The DCLG 1,070 figure scores a double positive score in the medium term, which is better than both the 867 and the 953 dpa figure, with the summary stating that "the figure would be likely to drive significant positive effects in the medium term." The double positive long term score against the 1,070 figure is uncertain only due to the 10 year period of the Government's housing need figure. Not only do GL Hearn consider the 867 dpa figure to be too low and harmful, but this view is equally shared by Amec Foster Wheeler in the February 2018 SA.





The Council's own Sustainability Appraisal (February 2018) of the OAN Options at SA Appendix N informs a higher level of housing than that proposed in the current Plan would be more sustainable overall.

- 3.12 From all the material available, it would appear only the unqualified Elected Members are of the view the 867 dpa figure should be maintained. It is for that reason we consider Policy SS1 is unsound on the basis that the evidence base has been ignored for essentially political reasons.
- 3.13 Applying the 953 dpa figure from the 1st March 2012 SHMA base date would equate to the following:-
- 1st April 2012 – 31st March 2038 (26 yrs in total) = 24,778
 - Requirement from 1st April 2017 = 21 years x 953 + early shortfall (896) = 20,909
- or
- **996 dwellings per annum 1st April 2017 to 31st March 2038**

Alternative OAN Work and inputs

- 3.14 We are aware of modelling of housing need undertaken by Lichfields and others. As noted within consultation responses to previous drafts of the Local Plan, neither the 2016 SHMA, nor its 2017 addendum have considered the implications of the LEP ambitions for growth. This should be factored into the assessment.
- 3.15 The 2016 SHMA identifies a small increase of just 8dpa to take account of market signals, this is less than 1% of the identified OAN. Paragraph 11.34 identifies that this adjustment is made to reflect the level of suppression in household formation. We consider this uplift to be too low.
- 3.16 The PPG, paragraph 2a-019, identifies a series of market signals which should be considered. These include land prices, house prices, rents, affordability, rates of development and overcrowding. According to the PPG a worsening trend in **any** indicator requires an upward adjustment to planned housing numbers compared to ones based solely on household projections (paragraph 2a-020). The SHMA correctly considers the majority of these signals. It



is notable from the analysis that York performs poorly against rates of development and affordability.

3.17 In terms of under-delivery this amounted to almost 23% of the target between 2004/5 and 2013/14 (paragraph 8.38; 2016 SHMA). If this were further updated this under-delivery would further increase. In terms of affordability this continues to deteriorate and stands significantly above the national average. These two indicators alone suggest a need for a market signals uplift.

3.18 It is recognised that the 2016 SHMA applies an uplift to HRRs which may account for some of the suppression of household formation. It is, however, notable that the PPG provides a distinction between adjustments for household formation rates from any market signals uplift. The PPG question '*What is the starting point to establish the need for housing?*' (ID 2a-015) is clear that the household projections plus such adjustments for issues such as household formation and the effects of under-delivery on migration represent the demographic starting point. A market signals uplift is clearly made after this starting point. The PPG clearly separates the two issues and states;

“The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals” (PPG ID 2a-019).

3.19 Given the signals described above it is considered that a market signal uplift of 20% is warranted. The need for such an uplift is also supported by the significant affordable housing need within York. As stated above, we are aware of the work on OAHN undertaken by others including the modelling work of Lichfields. We acknowledge the approach taken by Lichfields which concludes an OAHN of **at least 1,150 pa from the base date of 2012.**

Emerging NPPF and Planning Practice Guidance (incorporating DCLG Housing Methodology)

3.20 Since the Pre-Publication Draft Local Plan Consultation the DCLG 'Planning for the Right Homes in the Right Places' consultation has ended and the draft NPPF has been published, along with Draft Planning Practice Guidance. The NPPF is expected to be formally published in Summer 2018. The standard DCLG Housing Methodology approach to rectifying affordability



problems identifies for York a OAN of 1,070 dpa, again significantly above that of the Local Plan 867 dpa as currently proposed.

- 3.21 The Draft Planning Practice Guidance states that “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.” In terms of an authority identifying a housing need lower than the number identified by the standard method the draft PPG states:

“Plan-making authorities should use the standard method for assessing local housing need unless there are exceptional circumstances to justify an alternative approach. Any deviation which results in a lower housing need figure than the standard approach will be subject to the tests of soundness and will be tested thoroughly by the Planning Inspectorate at examination. The plan-making authority will need to make sure that the evidence base is robust and based on realistic assumptions, and that they have clearly set out how they have demonstrated joint working with other plan-making authorities.”

- 3.22 We are aware that the Council are not obligated to apply the emerging NPPF, given the transitional arrangements which allow for an authority to apply the existing (previous) NPPF policies for the purposes of examining plans, where they are submitted on or before 6 months of the adoption of the final Framework, which is likely to be the case, as it allows the Council to submit the Local Plan before the end of 2018. This essentially means that the Council are not required to take into account the standard OAN methodology. That said, it is strongly recommended that the housing need in the Local Plan is increased to a minimum of 1,070 dwellings per annum at this stage, in alignment with the methodology, which will require the identification of additional land, to ensure that the inevitable changes to the Green Belt in York are made now, and secured for the long term. To not increase the housing requirement now will only lead to inevitable changes at the first review of the Local Plan (5 years from adoption), whereby an increase will lead to additional Green Belt changes. Given that this Local Plan is the opportunity to actually designate Green Belt land in York, it would be more appropriate to secure the long term permanence of the Green Belt now.

- 3.23 Council Officers opinion to the 23rd January 2018 Local Plan Working Group papers considered that “an increase in the supply of housing would place the Council in a better position for defending the Plan proposals through the Examination process.” Council officers suggested potential new housing sites to increase the housing supply however Members rejected all suggestions for increasing the housing requirement and the identification of additional sites.



From the Local Plan Working Group January 2018 report, It appears that City of York Council Officers themselves do not have confidence in the Publication Draft Local Plan housing requirement.

Conclusions relating to Policy SS1

3.24 In reviewing the various OAN options, it is clear there is no sound evidential approach to adopting the 867 dpa figure. The range of alternatives are:-

- Local Plan text Policy SS1 867 dpa
- Policy SS1 corrected for early years shortfall 923 dpa
- 2017 SHMA recommendation = early years shortfall 996 dpa
- DCLG Consultation Housing Methodology 1,070 dpa
- Lichfields Alternative with higher adjustments for jobs and market signals 1,150 dpa

3.25 The figures of the 2017 SHMA (adjusted for early years shortfall) and the DCLG Methodology are broadly similar and would suggest the net annual requirement for York is at least 1,000 dwellings per annum based upon the Council's own material and more likely 1,150 dpa based upon the DCLG and Lichfield's work once economic growth is factored into both.

Approach to Housing

3.26 Having reviewed the portfolio of sites set out in Local Plan, it appears that the Council's strategy is a combination of urban expansion, the provision of isolated new settlements and restricted growth in existing settlements. The document contains no narrative as to how, or why, the Council has arrived at this approach, nor does it set out the implications of this pattern of spatial distribution or discuss the alternative options considered.

3.27 In sustainability terms, we still consider it more appropriate to focus growth in the York urban area and expand existing settlements. This approach would make best use of existing infrastructure and resources, as well as ensuring that the needs of the local community are met. In particular, the failure to allocate land in existing settlements will increase affordability pressures in the City.



3.28 The proposed spatial strategy for the City, and how this will be achieved over the lifetime of the Plan (up to 2038), should be set out clearly in the Plan. Without this context it is not possible to consider the suitability of the portfolio of sites. The absence of an overarching spatial strategy is apparent as the Plan identifies two strategic housing allocations in isolated locations, significantly separated from the main urban area. Such an approach does not promote sustainable patterns of development as required by the Framework, and therefore conflicts with national guidance.

Concerns relating to ST15 - Elvington

3.29 Whilst it is accepted and welcomed that the development of Green Belt sites will be necessary to accommodate York's housing growth, we are concerned that the proposed allocation of land to the West of Elvington Lane [Allocation ref. ST15] would not create and support, sustainable patterns of development for the following reasons:

1. ST15 is situated in the open countryside in an isolated location, with no existing infrastructure capable of accommodating the proposed levels of development. This would result in a long lead in time as the provision of infrastructure is a long, complex and costly process. ST15 could therefore only provide new homes towards the end of the plan period and there is no certainty over the potential supply due to the complexities of delivery. It is also important to highlight that there is no known developer interest in this site at this time.
2. The necessity to create and maintain an appropriate landscape setting and substantial buffers would result in the loss of developable area and not make the best use of the land.
3. The vision for ST15 is to create a 'garden' village which includes shops, services and community facilities to meet the needs of future residents. In the case of ST15, the Council has failed to recognise that new settlements need to be of a sufficient size to support the required range of social and physical infrastructure. For example, in order for a new settlement to be truly sustainable, it would need to provide a secondary school. This would require a minimum of some 5,000-6,000 homes.

3.30 ST15 has been subjected to a Sustainability Appraisal but for whatever reason appears to score no differently to other Strategic Sites in terms of accessing all local services. Given its remoteness, this would suggest there is a flaw in the scoring system.



- 3.31 Figure 5.3 informs of the main transport corridors in relation to the main urban area. These transport corridors reflect the areas that are currently well connected to public transport. ST15 is clearly remote from such services.

Concerns relating to York Central – ST5

- 3.32 We have expressed concern over the over-reliance of delivery from the York Central site. York Central has a long history of non-delivery. While we envisage some residential development on the York Central site, it will not be at the amount envisaged in this Plan.

Concerns relating to ST35 (MoD Strensall) and ST36 (MoD Fulford)

- 3.33 Both these sites are owned by the MoD and both are currently operational. While the MoD has expressed an intention to dispose of these sites, these proposals are not immediate nor certain. As can be seen from Table 5.1, ST35 is a medium term release and ST36 is a long term release.
- 3.34 The text to ST35 in Policy SS19 informs the site is to be disposed of in 2021 but is not without challenges. The site lies adjacent to a SSSI and requires a sensitive approach to development. The text informs the site is remote from existing services such that the 578 dwellings will need to deliver a retail shop and a primary school. Both of these will impact upon the sites' viability.
- 3.35 Site ST36 in Policy SS20 is equally uncertain given it will not be released until 2031 and development unlikely to commence until 2033, the end of the Council's housing delivery period. The text in Policy SS20 and supporting paragraphs reference a raft of heritage concerns which may impact on the quantum of delivery from the site; this will be the case should many of the existing buildings need to be retained.
- 3.36 It is our opinion that site ST36 lacks certainty such that it should not be an allocated site. In making this suggestion to remove this site there is a recognition the site could be developed in time but that could be for a later review of the Plan.



Concerns relating to the 5 year supply

- 3.37 It is known and accepted by the Council that it is unable to currently demonstrate a 5 year supply of housing and that matters will only worsen should the adoption of a new Local Plan be delayed.
- 3.38 The extent of the current supply and recent shortfall is a matter of dispute as the OAN options referenced above vary significantly. The greater the OAN, the greater the shortfall and the greater the 5 year requirement looking forward over the next 5 years once the Framework para 47 shortfall and buffer are correctly applied.
- 3.39 The Council's 2017 Local Plan and SHLAA both contain a delivery trajectory but lack any real detail. From the material available, it would appear the Council is reliant on several large strategic sites making an early delivery start with high levels of delivery. It is our opinion that this approach is unrealistic, especially given known and well researched lead in times for large strategic sites such as ST14 and ST15, ST35.
- 3.40 When an OAN higher than that sought in the Local Plan is applied with longer lead in times from these larger more remotes sites is applied, the current Local Plan falls well short of an early years 5 years supply.
- 3.41 We have significant concerns with the Council's continued use of student accommodation in the completion figures, which artificially boosts the housing delivery figure. The Council's Housing Monitoring Update October 2017 reveals that in the first half of 2017/18 of the total 1,036 net housing completions, 637 were from privately managed off campus student accommodation, and only 371 were from traditional Use Class C3 housing completion sites. The CLG's household projections do not include an allowance for students, with the household projections upon which York's OAHN is based relating to C3 uses only, and not C2. Student accommodation should therefore be excluded from the completion figures.



Policy SS2 – The role of York’s Green Belt

- 3.42 We support the Council in its acknowledgement that the current ‘Draft’ Green Belt boundary will need to be altered to meet the development needs of the area. This is clear from the evidence provided by the Council.
- 3.43 The Pre-Publication Draft and subsequent Publication Draft is an improvement on the Preferred Options Paper of 2016 in that it recognises the Plan Period needs to run to 2038 and not 2032 as was the case in the 2016 version.
- 3.44 However, the Pre-publication and subsequent Publication Draft fails to provide sufficient land for housing and again contains no Safeguarded Land. This is in our opinion a shortcoming of the Plan.
- 3.45 The identification of Safeguarded Land is considered particularly important as the Plan will set detailed Green Belt boundaries for the first time and an appropriate and sound strategy is therefore required to enable flexibility up to and beyond the plan period. We consider that Safeguarded Land is required in the City to provide a degree of permanence to the Green Belt boundary and avoid the need for future review. It would also provide flexibility and allow land to be brought forward quickly without a fundamental review of the whole Local Plan if allocated sites were unable to deliver the quantum of development envisaged. This is particularly important when considering the complex nature of some of the sites that are proposed for allocation in the Plan e.g. York Central and land to the West of Elvington Lane, as well as potential heritage issues with other sites across the City which may prevent the deliverability of some allocated sites coming forward as envisaged Flexibility is therefore essential, with a contingency of sites required to not only provide a buffer of sites but in addition, respond to the fact that the housing requirement is a minimum target rather than a maximum figure.
- 3.46 The current approach adopted in the Plan conflicts with national guidance and advice sought by the Council from John Hobson QC (Landmark Chambers) in relation to Safeguarded Land which concluded that:

“In my opinion if no safeguarded land is identified in the emerging Local Plan this would give rise to a serious risk of the Plan being found unsound. There would be a failure to identify how the longer term needs of the areas could be met, and in particular a failure to



indicate how those longer term needs could be met without encroaching into the Green Belt and eroding its boundaries”

3.47 The Council has also been advised by Counsel that it would be appropriate for the Green Belt to endure for a ten year period beyond the life of the Plan. We therefore request that the Plan is amended accordingly to ensure that it is effective and consistent with national policy.

Need for additional sites and Safeguarded Land

3.48 Having regard to the fact that the OAN/requirement needs to be higher and that doubts can be expressed over the selection of certain sites (ST15, ST35, ST36) where delivery may not come about as forecast, we consider this Local Plan has a shortfall of housing in terms of the following:-

- The Plan lacks sufficient housing allocations to deliver the 21,000 net dwellings for the Plan Period up to 2038
- The Plan lacks flexibility by having no Safeguarded Land to give a new Green Belt any degree of permanence.

Long Term Delivery 2033 to 2038

3.49 The threat of insufficient housing over the Plan period is evident in the Council’s own trajectory at Figure 5.1. The Plan informs of a supply of housing land up to 2038 yet beyond 2033 the Plan as drafted has only limited supply, see Table 3.1 below.

Table 3.1: Long Term Delivery Trajectory Post 2033

Source	2033/34	2034/35	2035/36	2036/37	2037/38
Windfall (Para 5.8)	169	169	169	169	169
Elvington ST15	150	150	150	150	150
Clifton Moor, ST14	100	50			
ST36 Fulford	50	100	100	100	100
Total	469	469	419	419	419
OAN (minimum)	1,000	1,000	1,000	1,000	1,000
Shortfall	-531	-531	-581	-581	-581



3.50 As can be seen above, the Plan makes very little provision post 2033 meeting less than half the requirement. The table above demonstrates the need to identify long term sources of supply such that delivery can be maintained across the whole Plan Period.

Remedy

3.51 In order to remedy the lack of flexibility and potential longer term shortfall up to 2038, the Plan needs to Allocate and Safeguard more land.

General Policy Comments

3.52 The following table identifies a number of Policies in the Plan to which we express concern. These are listed as Table 3.2 below.

Table 3.2: General Policy Observations

Policy	Remark	Remedy
H1	<p>Phased Release:</p> <p>Policy H1 as drafted refers to phasing but lacks timescales. Table 5.1 informs of no phased release mechanism with only the MoD Sites having a delivery delay due to disposal dates.</p> <p>Insufficient range of sites are identified given concerns with housing requirement, and lack of identification of safeguarded sites.</p> <p>We question the validity of the use of historic windfalls going forward when such windfalls have come forward at a time of no adopted plan being in place. It is not certain that the average windfall</p>	<p>Re-draft to;</p> <ul style="list-style-type: none"> • Insert Plan Period Dates • Identify additional sites to meet the increased recommended housing requirement, and in addition provide a buffer of sites provide choice and flexibility in the market, and not place an over reliance on windfall delivery. • Remove reference to phasing • Remove text on 5 year supply assuming there is no release



	rate will continue at this rate going forward	mechanism, thus no need for 5 year supply text.
H2	<p>Density:</p> <p>Reference to 'net' density is welcomed as this is often overlooked in policy of this type. Further clarification is required in supporting text.</p> <p>We welcome the reference that on strategic sites specific master planning agreements that provide density targets for that site may override the density policy, and welcome that the policy should be used as a 'general guide.'</p> <p>That said, it is not clear where the net density requirements in Policy H2 are derived, which are considered to be too high, too prescriptive and unachievable. Whilst the explanatory text refers to density testing having been carried out through viability and deliverability work, there is no information to justify the density ranges.</p>	<p>Supporting text needs to reference those elements that relate to gross and net. E.g. Water Attenuation Areas, public open space requirements. In addition, this text needs to have regard to garden size requirements in any design guide. The densities proposed need to be tested on recently approved schemes as we question the achievability of the 100 and 50 dph within the City Centre and York urban area, which will undoubtedly require multi-storey development, which is likely to impact on heritage issues.</p> <p>1. Given that the Council refer to the Policy as a 'general guide' we recommend further flexibility in the policy with density ranges e.g.</p> <ul style="list-style-type: none"> • 80-100 units/ha within the city centre • 40-50 units/ha within the York urban area • 30 – 40 units/ha within the suburban area and Haxby/Wigginton • 20-30 units/ha in the rural area and villages
H3	Housing Mix:	



	<p>We object to this policy. The policy needs maintain a degree of flexibility given the SHMA considers only need as opposed to 'demand' and the SHMA represents a certain snapshot in time. It is questionable how the SHMA can estimate the size of market and affordable homes required over the plan period to 2038. It is important that a mix policy is workable, to ensure that housing delivery is not stalled due to inflexible and overly prescriptive requirements.</p> <p>The requirement to consider mix and evidence of need appears to have no site size threshold e.g, sites of 100 dwellings or more.</p>	<p>Insert additional wording allowing greater flexibility of the housing mix to reflect housing demand, and differences in demand across the City, as well as an acknowledgement that the demand will also vary over the course of the plan period.</p> <p>Insert a site size threshold at which evidence of need and demand is required. Further information is needed on the evidence required, along with reference to the mix needing to be assessed at the time of an application</p>
H4	<p>Custom Build Housing:</p> <p>We object to the need to insert Custom Build Housing on larger allocations. Those traditionally seeking to build their own home are not normally seeking to build on a housing estate. Sites of up to 10 dwellings with affordable housing commuted off site are the best vehicle for this approach.</p>	<p>Remove text referring to Strategic Sites delivering Self Build.</p>
H5	<p>Gypsy and Travellers:</p> <p>We object to Policy H5 as drafted. Gypsy and Traveller pitches are not suitable for large strategic housing sites, they have particular needs that traditionally require their own site.</p> <p>While we have no objection to the second part of the policy that seeks a contribution, this appears to lack any justification.</p>	<p>Remove part B of the policy with reference to on-site provision on large sites over 5ha.</p> <p>Provide clarity on the level of contribution being sought.</p>



	<p>Excessive requests may adversely impact upon on the delivery of affordable housing.</p> <p>Why don't the Gypsy and Traveller community fund the delivery of their own plots?</p>	
H7	<p>Student Housing:</p> <p>The Plan needs to make clear that Student Housing sits outside the OAN and Housing Supply.</p>	Clarification text required.
H9	<p>Older Persons Specialist Housing:</p> <p>Policy H9 requires further clarification on what is required in terms of numbers and types. While house builders can provide elderly persons housing under C3, the provision of extra care housing as a C2 class is more complex.</p>	<p>The reference to Strategic Sites providing homes for the elderly needs to reference C3 uses only.</p> <p>The supporting text at para 5.58 needs to more clearly inform that C2 development will not count towards the housing supply in the OAN.</p>
H10	<p>Affordable Housing:</p> <p>The Policy overlooks the Government's intention to deliver 'Starter Homes as part of the Affordable Housing Mix (as included in the emerging NPPF)</p> <p>The Policy should consider inserting an off-site contribution for Self Build Custom Sites as per the Rural Sites.</p> <p>While the 30% affordable housing target is currently not objected to, there are many policies in the Plan that seek 'Developer Contributions'. We are currently reviewing the cumulative effect those have on viability overall.</p> <p>It would be our preference to see sites over 5Ha delivering 25% affordable</p>	<p>Insert reference to Starter Homes.</p> <p>Change sites over 5Ha to a 25% requirement.</p>



	<p>housing such that other infrastructure requirements can be funded.</p> <p>The changes to Policy H9 since the pre-publication draft in relation to urban, sub-urban and rural sites between 2 and 10 dwellings are noted.</p>	
HW2	<p>New Community Facilities:</p> <p>Whilst we welcome the policy wording change which deletes the 10 dwelling threshold for an audit of existing community facilities to be prepared, there remains little detail on the extent of developer contributions is required.</p>	<p>Clarification on level of contribution is required, as well as flexibility to account for the cumulative impacts on viability of various policy requirements.</p>
HW3	<p>Built Sports Facilities:</p> <p>Further detail on the extent of developer contributions is required.</p>	<p>Clarification on level of contribution is required, as well as flexibility to account for the cumulative impacts on viability of various policy requirements.</p>
HW4	<p>Childcare Provision:</p> <p>We object to strategic sites being required to undertake an audit. This is work only the LEA can perform and onus should not be placed upon the developer. Further detail on the extent of developer contributions is required.</p>	<p>Clarification on level of contribution is required.</p>
HW5	<p>Healthcare Services:</p> <p>We object to the requirement that a developer is required to undertake an assessment of accessibility and capacity at the application stage. This is material</p>	<p>Clarification on level of contribution is required.</p>



	<p>the health service should be providing to the Local Plan and CIL if progressed.</p> <p>Further detail on the extent of developer contributions is required.</p>	
HW6	<p>Emergency Services:</p> <p>Further detail on the extent of developer contributions is required.</p> <p>The Policy requirement for additional spoke facilities is not an absolute and should be subject to dialogue with the Ambulance Service at the application / masterplanning stage to ascertain demand.</p>	<p>Clarification on level of contribution is required.</p> <p>Flexibility is required in the wording, to allow for dialogue between the Ambulance Service at Masterplanning / Application stage.</p>
HW7	<p>Healthy Places:</p> <p>We object to this policy requirement. On the basis that sites are selected on the grounds of being sustainable, the need for such an assessment is negated by the allocation.</p>	<p>Delete the policy.</p>
ED6	<p>Preschool, Primary and Secondary Education:</p> <p>Further detail on the extent of developer contributions is required.</p>	<p>Clarification on level of contribution is required.</p>
ED7	<p>College Development:</p> <p>Further detail on the extent of developer contributions is required.</p>	<p>Clarification on level of contribution is required.</p>
ED8	<p>Community Access to sport:</p> <p>Further detail on the extent of developer contributions is required.</p>	<p>Clarification on level of contribution is required.</p>
D2	<p>Landscape and Setting:</p>	



	Policy D2 makes reference to the most up to date York Landscape Character Appraisal. We have been unable to locate this document.	CYC to provide Landscape Character Appraisal Report into Evidence Base documents.
D3	Cultural Provision We object to the request that strategic sites will need to demonstrate that future cultural provision has been considered and provide a Cultural Wellbeing Plan. This is a task only the Council can perform.	
GI1	Green Infrastructure: Further detail on the extent of developer contributions is required.	Clarification on level of contribution is required.
GI2	Biodiversity and Access to Nature: Further detail on the extent of developer contributions is required.	Clarification on level of contribution is required.
GI3	Green Infrastructure Network: Further detail on the extent of developer contributions is required.	Clarification on level of contribution is required.
GI4	Trees and Hedgerows: Why is a developer contribution required to protect existing trees and hedgerows as suggested in the 'Delivery' explanatory text to this policy?	Fails the test.
GI5	Protection of Open Space and Playing Pitches: Why is a developer contribution required to protect existing pitches from development?	Fails the test.



<p>GI6</p>	<p>New Open Space Provision:</p> <p>We object to point 'iii' that requires further land beyond the allocated boundaries of strategic sites. There is no justification for this request. The request also does not sit comfortably when the land is being retained as Green Belt.</p> <p>Further detail on the extent of developer contributions is required.</p>	<p>Clarification on level of contribution is required.</p>
<p>CC1</p>	<p>Renewable and Low Carbon Energy Generation and Storage:</p> <p>While we welcome the addition of reference to viability in this Policy since the Pre-Publication Draft, we object to this policy being applied to strategic housing sites. The Policy and supporting text is unclear as to whether or not this applies to major residential schemes. The text in the Peter Brett Associates Local Plan and CIL Viability Assessment suggests it does not apply – Para 5.4.7 informs no costs have been allocated to this requirement as the Carbon Trust noted further work is required.</p> <p>In alignment with HBF comments, we consider the requirements of this policy could have the potential to add costs to the delivery of housing development.</p>	<p>Doubt exists over the application of this policy. See Peter Brett Report para 5.4.7.</p> <p>The Carbon Trust Report still does not appear to be an evidence base report – it needs to be if the Council are to rely upon it.</p>
<p>CC2</p>	<p>Sustainable Design and Construction</p> <p>19% reduction</p> <p>We object to this requirement as it goes beyond building regulations without justification to introduce the optional</p>	<p>Delete parts i and ii in relation to all new residential buildings.</p>



	<p>standards. Building Regulations are constantly being updated and improved and there is no case for York to run a parallel process.</p> <p>The Peter Brett Report Table 5.12 informs this policy increases the cost of building a typical 3-bed dwelling by £812 which is presumably over and above the cost of a standard home built to current Building Regulations requirements.</p>	
CC3	<p>District Heating Networks:</p> <p>We object to this policy.</p> <p>The insertion within the Policy text since the Pre-Publication Draft now refers to all 'New Strategic Sites.' Paragraph 11.33 remains unchanged and informs this policy applies to residential schemes in excess of 300 dwellings. This would cover all proposed Strategic Housing sites.</p> <p>We object on the basis that energy efficiencies are already sought under Policy CC2 and as demonstrated in Table 5.12 of the viability report the cost of Policy CC3 would be an extra £3,396 to a typical 3 bed house.</p> <p>The Plan contains no good examples of where such a system has been successfully installed on a large housing site. The installation will impact upon the delivery of other elements of social infrastructure.</p>	<p>Remove reference to all New Strategic Sites from this policy and supporting text.</p>
ENV1	Air Quality:	



	<p>We object to the requirement for strategic sites to undertake a detailed emissions strategy. Each strategic site is identified, allocated and masterplanned in accordance with the policy requirements of the plan. To request an emissions strategy later down the line at application stage merely inserts an unnecessary layer of paperwork on a site that has already been examined and found to be suitably located..</p>	
ENV4	<p>Flood Risk: Further detail on the extent of developer contributions is required.</p>	<p>Clarification on level of contribution is required.</p>
ENV5	<p>Sustainable Drainage: Further detail on the extent of developer contributions is required.</p>	<p>Clarification on level of contribution is required.</p>
T1	<p>Sustainable Access: We welcome the additional flexibility added to the Policy and paragraph 14.10 since the Pre-Publication Draft, which makes reference to enhancing existing services as an alternative to the provision of new high quality public transport services, and refers to potential that such new services or enhanced existing services will become commercially viable within a shorter timeframe.</p>	
T2	<p>Strategic Public Transport Improvements: Further detail on the extent of developer contributions is required.</p>	<p>Clarification on level of contribution is required.</p>



T3	York Railway Station: Further detail on the extent of developer contributions is required.	Clarification on level of contribution is required.
T4	Strategic Highway Network Capacity: The timings of junction upgrades in this policy need further explanation and linked back into the delivery trajectories of each strategic site. Further detail on the extent of developer contributions is required.	Clarification on level of contribution is required.
T5	Strategic Cycle and Pedestrian Networks: Further detail on the extent of developer contributions is required.	Clarification on level of contribution is required.
T6	Development Near Transport Corridors: Further detail on the extent of developer contributions is required.	Clarification on level of contribution is required.
T7	Minimising Generated Trips: Further detail on the extent of developer contributions is required.	Clarification on level of contribution is required.
T8	Demand Management: Further detail on the extent of developer contributions is required.	Clarification on level of contribution is required.
T9	Alternative Fuel Fuelling Centres: Further detail on the extent of developer contributions is required.	Clarification on level of contribution is required.



<p>C1</p>	<p>Communications Infrastructure:</p> <p>We note the addition to this Policy since the Pre-Publication Draft regarding Next Generation Access (NGA) broadband connection. A degree of caution is required given that the inclusion of digital infrastructure is not within the direct control of the development industry, and therefore this policy could create deliverability issues. As well as developers engaging with communication providers, it is considered the Council should also work proactively with digital infrastructure providers.</p> <p>Further detail on the extent of developer contributions is required.</p>	<p>Insert reference in the Policy regarding the Council and Developers engaging with communication providers.</p> <p>Clarification on level of contribution is required.</p>
<p>DM1</p>	<p>Infrastructure and Developer Contributions:</p> <p>Note, the table above identifies circa 30 policies where ‘Developer Contributions’ are referenced in the supporting ‘delivery’ text.</p> <p>While the text to support Policy DM1 makes an attempt to draw these together, it must be acknowledged they are all potentially making demands of development on matter that in the main would be covered by a CIL.</p>	<p>The viability work currently being undertaken by CYC needs to be vigorously tested working with the development industry including an assessment of the cumulative impact on viability is required.</p> <p>Para 173 of the Framework requires robust viability testing of Plans such that policies do not. Text from Para 173 regarding reasonable returns to landowner and developer need to be added.</p> <p>More detail needed within Table 15.2 with specific monitoring triggers and</p>



		mechanisms (including timescales) where action is required should a target not be met.
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- 3.53 We note the ‘Delivery and Monitoring Tables’ to the rear of the Plan contains **no** requirement to maintain a 5 year supply and what actions are to be taken in the event of a housing delivery failure. This is a failure of the Plan as drafted, and in alignment with HBF comments, we consider that specific monitoring triggers are introduced.
- 3.54 Given the Plan contains no Safeguarded Land and is overly tight in the provision such that it contains no flexibility in the event of a delivery failure, the Plan contains no review mechanism. In other words, it lacks any Plan B options should Plan A fail. It is therefore unsound in that the option chosen with no flexibility and overlooking key parts of the OAN evidence base are unjustified.
- 3.55 The manner in which politicians have ignored the evidence base and findings of the sustainability appraisal on OAN options fail the soundness test of being positively prepared.
- 3.56 The Plan simply needs more housing land above that currently in the Plan. The site north of the A59 Boroughbridge / Roman Road in Poppleton is a sustainable and appropriate housing site, the development of which would bring significant community benefits. The site should be allocated to assist in meeting the Council’s shortage of housing land currently proposed in the Local Plan.



APPENDIX 1

UPPER POPPLETON







York Business Park
(Nether Poppleton)

Rail Station

Open Land
In Perpetuity

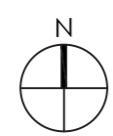
Poppleton Bar
Park and Ride

Key

-  Site Area
-  Residential Development Area
-  Vehicular Access Point
-  York outer ring road
-  Railway Line
-  Bus Link to City Centre

DO NOT SCALE DRAWINGS. ALL DIMENSIONS TO BE CHECKED ON SITE. ERRORS TO BE REPORTED IMMEDIATELY TO LANDSCAPE DESIGNER.

TO BE READ IN CONJUNCTION WITH ALL RELEVANT ARCHITECTS, SERVICES AND ENGINEERS DRAWINGS.



Title Immediate Site Context

Dwg No 02

Coronet House,
Queen Street
Leeds LS1 2TW

Project Land to the south of Upper Poppleton

Ref
Scale 1:5,000

t: 0113 887 0120
e: Mark@johnsonmowat.co.uk
Richard@johnsonmowat.co.uk
w: www.johnsonmowat.co.uk

Client Avant

Date September 2016



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

OFFICE USE ONLY:

ID reference:

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

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

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

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

Part A - Personal Details

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

1. Personal Details		2. Agent's Details (if applicable)
Title		Mrs
First Name		Janet
Last Name		O'Neill
Organisation (where relevant)		O'Neill Associates
Representing (if applicable)		University of York
Address – line 1		Lancaster House
Address – line 2		James Nicolson Link
Address – line 3		Clifton Moor
Address – line 4		York
Address – line 5		
Postcode		YO30 4GR
E-mail Address		j.oneill@oneill-associates.co.uk
Telephone Number		01904 692 313

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)

With regard to the duty to co-operate it may be the case the Council has consulted with neighbouring authorities, but some of those authorities have expressed concerns that have not been fully resolved. Annex B to Agenda item 11 on the report of the Local Plan to the Council's Executive on the 25th January reported:

Hambleton Council: *"...It [the Draft Plan] does not safeguard land for development and recognises the build out time of the Strategic sites will extend beyond the plan period. The proposed detailed boundaries of the Green Belt offer little opportunity to accommodate the increased level of growth proposed. If the City of York does not ensure that its longer-term development needs are met this will place pressure on area in neighbouring authorities"*

Leeds city region LEP: *"York has not applied the 10% market signals adjustment as recommended in the York 2017 Strategic Housing Market Assessment".*

Ryedale Council: Discussions ongoing

Harrogate Council: Discussions ongoing

Selby District Council: *"Having read the SHMA Addendum, it is noted that this figure does not take into account the level of employment growth proposed by the Local Plan..... Whilst you are confident that you can realise the growth aspirations detailed within the Pre-Publication Local Plan within the City of York Boundary, Selby District Council is concerned that any increases to this figure could raise significant cross-boundary issues".*

Selby Council requested additional information on Strategic Site ST15 and the University Site ST27 before providing any further comments on the potential impact these allocations may have on Selby.

What these comments demonstrate is that whilst the Council may have engaged in a process of dialogue with neighbouring authorities, it has not produced outcomes that have addressed some significant concerns of neighbouring authorities. Indeed, at this stage the views of some adjoining Authorities are not known and it is difficult to see how, in these circumstances, the Duty to Co-Operate has been complied with.

What does ‘Sound’ mean?

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

What makes a Local Plan “sound”?

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

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

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

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

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

Yes No

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

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

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

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

(Complete any that apply)

Paragraph no.	<input type="text"/>	Policy Ref.	EC1, ED1, ED2, ED3, H7, SS1, SS2, SS22	Site Ref.	ST27
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5.(4) Please give reasons for your answers to questions 5.(1) and 5.(2)

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

Please refer to attached representations documents.

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 refer to attached representation documents.

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:

The issue of an adequate extension site for Campus East is crucial to the growth strategy of the University of York. This is a Russell Group University of global stature. Due to the absence of a reasoned justification for the Authority to set aside its officers' sustained advice on meeting the University's needs, an oral hearing is essential.

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

29 March 2018

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

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

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

EVIDENCE SCHEDULE

1. Form
2. Evidence Schedule
3. Planning Statement
4. University of York – Growth Rationale for Campus Extension to the South of the Lake Stephen Talboys, Director of Estates, University of York
5. Economic Benefits from the Expansion of the University of York
Stephen Nicol, Nicol Economics
6. Campus East: Development Options and Master Plan of Extension Site
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7. Outline Landscape and Visual Appraisal of Proposed Extension Allocations for Campus East
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THE CITY OF YORK
Local Plan - Publication Draft
February 2018
Regulation 19 Consultation

REPRESENTATIONS ON BEHALF OF

THE UNIVERSITY *of York*

PLANNING STATEMENT

April 2018



Chartered Town Planning Consultants

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PLANNING STATEMENT



Chartered Town Planning Consultants

EVIDENCE SUBMITTED

1. Consultation Response Form
2. Schedule of Evidence submitted
3. Planning Statement
Janet O'Neill, Director, O'Neill Planning Associates Limited
4. University of York – Growth Rationale for Campus Extension to the South of the Lake
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7. Options considered by the University for expansion
8. Comparison of the benefits of site ST27 and the University preferred 26ha site
9. Other issues of representation: changes requested to the draft local plan
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(ref:ulp1803.pl statement.v5)

APPENDICES

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 - 1.1 boundaries of campuses
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 - 1.3 campus west development brief
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EXECUTIVE SUMMARY

1. My name is Janet Mary O'Neill. I am a chartered town planning consultant and a director of O'Neill Planning Associates Limited, a chartered planning consultancy based in York. I lead a team of 6 chartered planners. I have extensive experience of the evolution of the local plan for the City of York. I was President of the RTPI in 2008.
2. I personally have acted on behalf of the University of York since 1993 when a public inquiry gave consideration to the extension of Campus West onto the land south of the current campus in an area of green belt. Permission was granted in 1994.
3. I led the team that prepared and submitted the outline planning application for campus east (then named Heslington East) on 116ha of agricultural land in green belt to the east of the original campus, then Heslington West. This application was called in by the Secretary of State prior to determination by the City Council and, following a lengthy public inquiry, outline permission was granted in 2007. Of the 116ha, a central 65ha was allocated for development and the remainder was protected as wide landscape buffer zones including a 14ha lake. The development area is confined to low density expansion, considered appropriate by the Secretary of State for a location on the edge of open countryside. From 2009 on first building occupations, almost 50% of the 65ha has been built out.
4. Because the York local plan will confirm the inner boundaries of the green belt for the first time, a longer plan period to 2038 is proposed. Based on its vision and growth strategy, and the range of growth scenarios that has been prepared, the University has concluded that the remaining development allocated land at campus east will be built out well within the plan period. Adequate land needs to be allocated at this time for its further extension otherwise potential sites will be fixed within green belt.
5. The City Council has accepted that an extension site is required during the plan period and draft policies SS22, EC1 and ED3 (appendix 3) all facilitate this expansion, strategic site ST27 is included in the draft plan. However, given even medium range growth rates for the scenarios tested, (see University evidence) the 21.5ha extension site in the draft plan would be inadequate. The site is immediately adjacent to the busy A64 trunk road,

York outer bypass. For visual reasons and in order to create a pleasant landscape dominated campus extension, a wide buffer to the A64 would reduce the developable area to 13ha. On recent rates of development of 3ha/annum this would constitute a 4 year land supply.

6. The guidance in NPPF states that green belt boundaries should not be confirmed until the demand for sustainable development has been met. On these grounds alone, the emerging local plan is unsound.
7. The University proposes a 26ha site to the south of the campus east lake and distant from A64 be allocated, as proposed by the City Council in 2014. Because land up to A64 is also controlled by the University, a 30ha landscape buffer could be provided as part of the development to provide a backdrop to the campus extension and wider views into and out of the city. This buffer would be within the green belt to remain open.
8. This evidence justifies the 26ha allocation in terms of need and economic benefit to the city and the region. The development potential of each option is predicted based on master planning each site. Impacts on landscape, heritage assets and the transport network are investigated and appropriate mitigation proposed as required.
9. The Inspector is respectfully requested to accept the case promoted for the 26ha site.

I. OVERVIEW OF REPRESENTATIONS

1.1 These representations are made on behalf of the University of York to the Publication Draft Local Plan of the City of York Council, dated March 2018. When adopted, this will be the first adopted local plan for the Council's area as enlarged in 1996, but the first adopted plan for the pre-1996 city boundaries since 1956. The plan will also confirm the inner edge of the York green belt for the first time. The general extent was defined in the Yorkshire and Humber Plan, RSS, adopted in 2008 and policies relating to the green belt were retained when the RSS was revoked in July 2010. The York local plan period stretches to 2038, the longer period is designed to allow sufficient development land to be identified prior to green belt boundaries being fixed.

1.2 The University was founded in 1962 on the south-eastern edge of the city. The main topic of these representations relates to the draft allocation of an extension site to the University's campus east, located to the south of this campus. The draft local plan contains various policies supporting the continued growth of the University and proposes a 21.5ha extension site to the south-east of campus east. However, due to that site's adjacency to the A64T bypass, the necessity for a wide landscape buffer reduces the developable area to around 13ha. The University has predicted its growth trajectory during the plan period to 2038 and the 13ha will be nowhere close to sufficient to cater for its needs.

1.3 By contrast, the University strongly supports the draft allocation in the Publication Draft local plan which was withdrawn in 2014. This was located due south of campus east and due to its location north-west of the outer ring road, a generous 30ha buffer could be provided between the site and the A64, making the whole site available for development, (see plans in appendix 1). [Note: Although the 2014 plan describes the site as 28ha, detailed measurement shows it to be 26ha. However, the boundaries are agreed with the Council.]. This representation seeks a reversion to that position which is essential to make the plan sound given the University's crucial role in the economic and social well-being of the City.

1.4 These representations describe: the recent rate of development and the future growth strategy of the University; an assessment of the economic benefits of growth to the University, city and the region; justification for the inclusion of the 26ha extension site including a comparison of the functional capacity of the 21.5ha against the 26ha site; assessment of any harmful impacts and

the measures proposed to mitigate such impacts. It relates how, throughout the emergence of the draft plan, officer assessments have supported the larger site and that a reasoned justification for adoption of the smaller site has not been made available by the City Council. Indeed the reasoning for the substantial reduction has never been properly articulated by the City Council, and remains evidentially opaque therefore.

1.5 Evidence statements included with this planning statement is listed in the forward. Topics covered are: the need for the expansion; the economic benefits of the expansion; master planning of site ST27 and the University's preferred option to establish development capacity; landscape and visual appraisal of each site; impacts on the heritage of the location and the wider city; transport impacts. The conclusions of this range of evidence are drawn upon for the planning statement but for detail of each topic, reference to the relevant evidence is necessary.

1.6 The title of the evidence statements are:

- o University Growth Rationale:
Stephen Talboys, Director of Estates, University of York
- o Economic Benefits from the Expansion of the University of York: Stephen Nicol,
Nicol Economics
- o Master planning: Campus extension development potential of options:
James Redman, MAKE Architects
- o Landscape Impact Assessment of alternative sites:
Tom Walker, Gillespies Landscape
- o Heritage Matters:
Chris Miele, Montegu Evans
- o Campus East Extension Transport Statement:
Simon Pratt, WSP

2. UNIVERSITY VISION AND STRATEGY

2.1 Since its foundation in 1963, the University of York has become one of the UK's most successful universities. Over its relatively short 50-year history it has demonstrated its capacity for success in terms of teaching, research, generation of new companies and jobs and of inward investment to both the region and the nation. It has evolved into a research led university of more than 16,500 students, over 4,000 staff and over 1,100 staff employed in knowledge led businesses. It has international standing and consistently achieves excellent results. Regularly, performance tables show it in the top 20 universities in the country and it in the top 150 in the world.

2.2 The University is a member of the Russell Group of leading UK universities, is growing and is highly successful. It delivers world-class research and top-quality teaching. The creation of an International Pathway College has further added to its offer, it acts as a feeder to both its undergraduate and postgraduate courses. Its continued high ranking in the league tables make it a popular choice for home, EU and overseas students.

2.3 In order to remain successful and sustainable over the medium to long term, it is central to the University's plans that it needs to continue to grow beyond the current student numbers. At present the University is hampered by the fact that it is relatively small compared to the average size of Russell Group universities and this has ramifications in a whole range of areas. The University aspires to retain and increase its world class reputation, and hence its contribution to the city and region will improve significantly. Given that the University is currently well below the size of the average Russell Group university, both overall and in many key programmes, its firm aspiration is that it will continue to grow, especially in programmes that are popular to overseas students, (see appendix 5).

2.4 Whilst the University has expanded from the original 300 students to 16,500 (FTEs) today, the research activity has also expanded within the various departments, particularly in sciences, leading to the provision of modern, sophisticated laboratory accommodation. Since 1992, knowledge-based companies have established on the University Science Park and from 2010, also on Campus East where incubator facilities for new businesses are included. There are currently 130 businesses located on Science Park and Campus East.

2.5 The vision of the Governing Body is set out in its University Strategy 2014-20:

- o To be a world leader in research
- o To offer outstanding teaching and learning
- o To offer all students an outstanding and valuable experience
- o To be sufficiently large to be excellent, resilient and financially sustainable
- o To work effectively with other organisations and stakeholders including significantly enhancing engagement with business and industry

To advance these objectives, the University anticipates that it needs to grow in the recruitment of academics and students to increase the scale of activities which are undertaken, in order to sustain its competitiveness nationally and globally.

2.6 To facilitate the achievement of these objectives, the University's estate will need to provide an environment and facilities of the quality and size to meet the aspirations of its Strategy. The initial Development Brief 1962-1972 had 4 core principles for the design of Campus West, which have been incorporated into the Adopted Masterplan for Campus East. These are:

- o The Landscape
- o Connectivity and Integration
- o Movement and Access
- o Social and Community Use

To this list has been added, meeting University sustainability objectives in activities, procurement, and management of its estate.

Sustainable Development

2.7 The University's Sustainable Development Policy sets out that it will seek to meet its overall objectives of maintaining and enhancing academic excellence in a manner that:

- o Responds to the full range of social needs
- o Seeks to minimise or remove adverse environmental impacts and
- o Is financially viable

2.8 Student numbers have grown substantially between 2009 and 2017 following the creation of campus east. The increase in FTE numbers was from 12,710 to 16,475 which is 30% or 4% p.a. The University has investigated a range of growth scenarios, from 0.5% to 4% p.a. Total student numbers in a range of 19,114 to 39,224 were tested. The analysis proves that the planned

expansion of the University will require development of the land to south of campus east for all five scenarios within the 20 year horizon of the local plan period. Scenarios 3 and 4 are considered the most likely outcomes which would require nearly all (at least 90%) of the 26ha of land to the south of campus east to be developed by 2038. This landtake is therefore greater than draft allocation ST27, the 21ha with net developable area of 13ha that is included in the Publication Draft Local Plan. The details of this exercise are contained in the University's evidence.

3. PHYSICAL GROWTH OF THE UNIVERSITY SINCE 1963

3.1 The University of York was founded in 1963. Outline planning permission was granted in 1962 for what is now called Campus West, and a Development Plan 1962–1972 was produced to set the design principles for the evolution of a low density campus university. The Development Plan was faithfully implemented on the principles of a collegiate university, a landscape dominated campus, a layout based on pedestrian movement within a 10 minute walking time across the campus and a large lake around which the colleges and other central facilities were located. The objective was to aid propinquity, so that students and staff alike would encounter one another conveniently. A large lake, sculptured landforms and extensive tree planting have created the place that is seen today.

3.2 The success of the University led to physical growth and the built form extended well beyond the scope of the 1962 Development Brief so that the need for further design principles became evident. This was provided in the form of the Development Brief for Future Expansion dated August 1999 which was prepared by collaboration between the City Council and the University. In the absence of an up to date local plan, the development brief was adopted by the Council as supplementary planning guidance. This document incorporated the principles of the original Development Plan but added an analysis of the landscape and designated areas to be preserved and areas available for development. Since that time, increased student and staff numbers have led to pressure for additional buildings and car parks and the scope for further expansion dwindled if the low density character was to be maintained.

3.3 The need to cater for the long term growth of the University was originally considered in 1960s. An allocation for expansion space to the east of the original campus was adopted in the

East Riding Development Plan in 1967 but it was not needed in the early years of development of campus west. In the mid-1990s it became evident to the University that expansion space was required if its continuing success was not to be seriously hampered. Therefore the proposal for a new campus on farmland to the east of Heslington village was advanced. The area was in green belt and although a local plan allocation for the site did not exist, one was included in the emerging York local plan by the early 2000s.

3.4 A Development Brief was commissioned for the new campus, which was again prepared by collaboration between the Council and the University. Many of the successful design principles of the original campus were retained, particularly those of a landscape dominated, low density development. This was formally adopted by the Council in 2004.

3.5 In the same year an outline planning application was submitted for the new campus which proposed very special circumstances to justify development in green belt. These were based on the substantial benefits to higher education, the local and regional economy, the community benefits of shared facilities and the measures proposed to mitigate impacts on traffic generation, ecology, archaeology and landscape. The planning application was called in by the Secretary of State, and following a public inquiry, outline planning permission was granted in 2007, [APP/C2741/V/05/1189972]. The Secretary of State accepted that very special circumstances had been established. The outline planning permission allows a 20 year period for reserved matters applications to be submitted. To fulfil planning conditions, a design brief including a masterplan and a landscape design brief were subsequently submitted and approved by the Council in 2008.

3.6 In the absence of an adopted local plan, the role of development briefs has been elevated and they have been used to brief architects and others initiating development projects on either campus, in order to bring forward detailed schemes. The separate campus development briefs have recently been merged and updated to provide guidance for schemes to replace the many of the original 1960s buildings on campus west and to précis the various design documents approved for campus east. Retaining the landscape dominated character of both campuses is achieved by a cap on developed footprint of 20% on campus west and 23% on campus east. This includes parking and access roads. The updated brief was submitted to the City Council in November 2017 and is awaiting adoption. Nonetheless it broadly establishes the overall level of density that is to be expected at the campus.

3.7 Circumstances differ between campuses. Campus west on 68ha, plus 8.9ha on the adjacent science park, has very little development potential remaining other than replacement of existing buildings or building on car parks. On Campus East around 50% of the 65ha approved for development has been built out within the first 10 years and thus has scope for new building, particularly on its western and eastern sides. The plan in appendix I illustrates the boundaries of each campus. In addition to campuses west and east at Heslington, the University has a very small city centre campus at Kings Manor which includes the Grade I listed Manor, the Victorian Headmaster's House and a 1960s academic block. It is at the heart of the Central Historic Core conservation area. Development potential is severely restricted and the campus is not anticipated to be able to meet future expansion needs.

3.8 The University's Vision and Strategy lead the guiding principles used to scoping development potential within the context of the development brief and the prevailing planning policy context.

4. PLANNING HISTORY

4.1 Planning permission in outline was granted for the original west campus in 1962 as part of the foundation of a group of new campus universities, including Sussex and Warwick. Permission was granted on the basis of a red line plan, there were no planning conditions attached to the permission. The Development Plan 1962-72 outlined the vision which has been the basis of the development of the campus. The character is a low density, landscape dominated campus with building heights restricted to those of adjacent mature trees. Buildings are set around a large lake and the campus is predominantly car free with vehicles restricted to peripheral car parks. Different uses, academic, social, sport and residences are integrated across the campus.

4.2 The design for campus east was based on the same principles as campus west; a low density, landscape dominated campus with buildings set around a large lake, and predominantly car free with vehicles restricted to peripheral car parks. The planning application site was located in easy walking and cycling distance of campus west on land in the control of the University. This was farm land amounting to 116ha of green belt.

4.3 In the absence of an adopted local plan, the outline planning application was called in by the Secretary of State. A 6 week public inquiry investigated: the need for and benefits of the expansion, options to developing in green belt, master planning principles, harm to the natural and historic environment and the interests of local communities. The planning inspector reported that although harm to green belt would result from the development, very special circumstances had indeed been shown by the benefits to higher education, the regional economy and community gains, and that adequate mitigation was proposed for impacts on travel, ecology, archaeology and heritage. The Secretary of State agreed with the inspector and outline planning permission in 2007. Amendment to a conditioned plan led to a new decision being issued in 2008.

4.4 Of the 116ha, generous landscape buffers exist on the western, northern and eastern sides of the site with a 14ha lake to the south. In the central belt is a 65ha area where development is permitted at 23% developed footprint (including car parks and access roads), (see appendix 1). Since development commenced in 2008, approximately 50% of the 65ha has been build out or landscaped. This is indicative of the success of the university, which has been more rapid than had been expected at the time of the inquiry.

4.5 Due to this comparatively rapid rate of development, the University, in considering its long term growth strategy, decided to promote an extension to campus east because it anticipated the need for further expansion space within the 20 year local plan period. An extension to Campus East on its southern edge to cater for expansion when campus east is built out was promoted in the Call for Sites in 2012.

4.6 Because the local plan when adopted, will confirm the boundaries of the York Green Belt for at least 20 years ahead, it is acknowledged by the Council that the longer term development needs of the University must be addressed at this stage. Not to do so would self-evidently render the plan unsound given the central role of the university to the economy of the City. The City Council included a draft 26ha allocation south of the campus east lake in the Publication Draft local plan 2014, (see appendix 3), this was considered to be just about adequate by the University. However, following revisiting the allocations plan in 2016, the current Publication Draft local plan retains an allocation for a campus extension but this is to the south-east of the campus lake and is now only 21.5ha including a 7ha landscape buffer to A64, (see appendix 3). The evidential basis for this reduction remains unclear and it is strongly considered that the location

and size of the draft allocation is inadequate to meet the needs of the University over the plan period and hence the objection being made and retained. This objection seeks a reversion to the position promoted in the 2014 draft plan.

5. PLANNING POLICY CONTEXT

5.1 The documents outlined below identify the current policy context in relation to further development at the University. Since campus east is subject to a recent outline planning permission which has a 10 year life remaining, it is the terms of the permission rather than the local plan which will control future development in the next decade. The City of York Council is in an advanced stage of preparation of a local plan, nonetheless until the plan is adopted NPPF is a crucial material planning consideration.

RSS

5.2 The Yorkshire and Humber Plan adopted in 2008 was revoked in 2010 except for policies YH9C and YI relating to the York green belt. These policies establish the general extent of the green belt as a strategic planning tool but inner boundaries are to be defined in the local plan, (see appendix 2).

Policy YH9, Green Belts

“C The detailed inner boundaries of the green belt around York should be defined in order to establish long term development limits that safeguard the special character and setting of the historic city.”

Policy YI, York Sub-Area Policy

Plans, strategies, investment decisions and programmes for the York sub area should:

C Environment

1. In the City of York LDF, define the detailed boundaries of the outstanding sections of the outer boundary of the York Green Belt about 6 miles from York City Centre and the inner boundary in line with Policy YH9C

2. Protect and enhance the nationally significant historical and environmental character of York, including its historic setting, views of the Minster and important open areas.”

These saved policies will apply in the Plan area until they replaced by an adopted City of York Local Plan.

NPPF

5.3 Of crucial relevance to this evidence is policy guidance on: building a strong, competitive economy, protecting green belt, design quality, promoting sustainable transport, promoting healthy communities, conserving and enhancing natural environment, sustainable use of materials and meeting the challenges of climate change. The key themes include the promotion of sustainable development and conservation of natural and built heritage.

5.4 NPPF 2012 confirms (para 7) that the purpose of the planning system as contributing to the achievement of sustainable development in its three dimensions of economic, social and environmental.

- o An economic role is performed by contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements including the provision of infrastructure.
- o A social role is performed by supporting strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being
- o An environmental role is performed by contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use of natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

5.5 Paragraph 14 confirms that for plan-making:

- o local planning authorities should positively seek opportunities to meet development needs of their area.
- o local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid changes unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole or

- specified policies in the Framework indicate development should be restricted, such as land designated as Green Belt.

5.6 Paragraph 80 confirms the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of green belt are their openness and permanence. The five purposes of green belt are to check unrestricted sprawl of large built-up areas, prevent coalescence of towns, safeguard countryside from encroachment, preserve the setting and special character of historic town and assist in urban regeneration. When defining boundaries, local planning authorities should ensure consistency with the local plan strategy for meeting identified requirements for sustainable development, (para 85).

Emerging Local Plan

5.7 Planning policy in a pre-inquiry Draft Local Plan dated 2005 and in the NPPF 2010 have been utilised by the City Council over recent years for the determination of planning applications. Submission of the Publication Draft for examination is anticipated in May 2018. The Plan includes draft policies relevant to the University including:-

- o ED1 on the university and ancillary uses acceptable on both campuses
- o ED2 policy for future development on Campus West, in particular development density, building heights, conservation of landscape
- o ED3 policy for future development on Campus East in particular development density, building heights, conservation of landscape, with the inclusion of an allocation of a 21.5ha expansion area, and up to 25ha of knowledge based businesses across both sites
- o EC1 covers provision of employment land across the plan area and lists 4 strategic employment sites including ST27 the 21.5ha campus extension
- o SS22 outlines policy for the campus extension to promote knowledge based business development and academic uses on Campus East and its extension. The character of ST27 is to be low density, landscape dominated
- o H7 student housing states that both universities in the city must address need for additional student housing arising from their future expansion, provision to be on campus for the University of York
- o SS2 the role of York's green belt: its primary purpose is to preserve the setting and special character of York and delivering the local plan spatial strategy

The wording of the draft policies for each is included in Appendix 3.

5.8 Both campuses are currently within the general extent York green belt in the saved policies of the Yorkshire RSS. In establishing the inner boundaries of the green belt for the first time the City Council rightly intends to exclude the development areas of both campuses and the expansion area for campus east from green belt.

5.9 Local Plan draft Policy ED1 supports the continuing development of the University. It allows for typical university activities on both campuses, defined as teaching, research and CPD (continuing professional development); housing for staff and students; arts, cultural, sports and social facilities; conferences; knowledge-based businesses including research-led science park uses; and other uses ancillary to the University including support services. The case made in the public inquiry for outline permission on campus east was that embedded or adjacent knowledge-based businesses are commonplace as part of the synergies developed by a modern research-led university and this was accepted by the Secretary of State.

Campus West

5.10 Draft Policy ED2 contains parameters for future development on Campus West, intended to maintain the character of the campus whilst facilitating extension and redevelopment of buildings. The significant aspects include the restriction to 23% developed footprint for buildings and car parks in order to retain the low density, landscape dominated character. Temporarily exceeding this cap during a period of implementation of proposals is permitted under the policy. To accompany the density parameter, heights are set to not exceed those of any adjacent mature tree canopies unless a greater height can be justified in relation to a proposed iconic or landmark building. Since density is already close to 20%, development potential is restricted to replacing existing buildings, to a greater height if appropriate, or by building on car parks.

5.11 The draft policy also requires defined areas of landscape to be conserved and enhanced, to preserve their longevity and contribution to the character of the campus. The plan included in Appendix I shows those zones of the campus considered to be important landscape areas for their various contributions to the character of the campus. General parking is restricted to 1,520 spaces to limit traffic generation though current provision is below 1,200 spaces. Other requirements cover the provision of an adequate internal cycle and pedestrian network and the

retention of no less than 3,586 bed spaces in student housing, to restrict the impact on local private rented sector housing.

Campus East

5.12 Draft policy ED3 for Campus East confirms that its continued development is supported by the City Council. Development parameters are based on the outline planning permission granted for the new campus by the Secretary of State in 2007 as amended in 2008. This permission allows for a 20 year period in which reserved matters planning applications can be submitted as opposed to the usual 3 years. The total area of the campus is 116ha, and a 65ha area allocated for development is identified centrally on the approved plans. The result is a wide landscape buffer on all sides, including a 14ha lake south of the allocated area. Roads, footpaths and cycleways cross the landscape buffers, otherwise it has developed a strong open space character of water, trees and grassland.

5.13 Outline planning conditions have been transposed into draft planning policy ED3:-

- o developed footprint in the area allocated for development no greater than 23% including buildings, car parking and access roads
- o car parking capped at 1,500
- o the parkland setting to be conserved and enhanced
- o up to 25ha of knowledge-based businesses including research-led science park uses
- o additional student housing to meet demand from the additional students and steps to be taken to encourage the maximisation of demand
- o an annual student housing survey to be submitted to the Council to illustrate that obligations on the provision of student housing to meet growth in student numbers is being met

5.14 In response to outline planning conditions, a Design Brief including Master Plan 2008 and the Landscape Master Plan 2008 were submitted to the Council and subsequently approved. An updated master plan was approved in 2011 as further design work was carried out, (see plans in Appendix I). The design brief illustrates how the various aspects approved or conditioned relate to development of the site. This Master Plan has been implemented as approved. The essence of the design is: -

- o 65ha area allocated for development subdivided by landscaped vista which provide views from the northern, higher ground of the site down to the lake and beyond to the Yorkshire Wolds in the distance
- o Clusters for development between the landscape vistas and overlooking the lake
- o Wide landscape buffers on all sides of the allocated area
- o A pedestrian and cycle ribbon, passing west to east through the centre of the campus
- o A movement spine through the site north of the lake, dedicated to pedestrians, cyclists, buses
- o The movement spine, now Lakeside Way, marking the boundary between the higher density land (80-90% of the approved built footprint) to the north, and the lower density land (10-20% of approved built footprint) to the south
- o A northern service road, now Kimberlow Lane, as the principle route for service access
- o Two car parks approved outside the clusters, north of the northern service road and in the north-east corner of the site south of the Council's Park and Ride site
- o An area substantially for organised sport on the eastern side of the allocated area, now the York Sports Village

5.15 The master plan is based on a substantially car free campus, with the bus route to the south of the development clusters, and servicing access to the north. The design is fixed by the 5 minute walking time from the western end of the campus to Heslington Hall and 14 minutes along the pedestrian ribbon to the Sports Village at the eastern end of the campus.

5.16 The knowledge based businesses are not to be confined to a designated science park but to be integrated with other uses across the campus to facilitate easy interaction between academics and business personnel.

5.17 Other areas of planning policy in the draft local plan particularly relevant to this brief are the requirement for high quality design in built form and landscape, promotion of sustainable development, conservation of local ecology and archaeology. The contribution of the University to the economy of the city and the region, both direct and indirect, is acknowledged as is that from knowledge-based businesses that co-locate on campus. Draft policy ED3 facilitates up to 25ha of knowledge-based businesses on Campus East and its extension. Community access to sport and cultural facilities in education sites is promoted in draft policy ED8. The planning

obligations attached to the planning permission for Campus East require public access to external areas of the campus and to sports facilities on both campuses.

5.18 Draft policy ED3 also provides for a further allocation of land as an extension to Campus East, south of the campus lake. This amounts to 21.5ha including a generous landscape buffer to the A64 as part of the development. The policy includes exploiting synergies with strategic housing site ST15 west of Elvington Lane, with regard to site servicing including transport, energy and waste.

Purpose of York Green Belt

5.19 NPPF guidance lists the five purposes of green belt. The draft local plan in policy SS2 states that the primary purpose of the York green belt is to preserve the setting and the special character of York and deliver the Local Plan Spatial Strategy...To ensure that there is a degree of permanence beyond the plan period sufficient land is allocated for development to meet the needs identified in the plan and for a further minimum period of five years to 2038. The explanation in paragraph 3.14 states:

'Over and above the areas identified as being important in terms of the historic character and setting of York other land is included to regulate the form and growth of the city and other settlements in a sustainable way. This land will perform the role of checking urban sprawl, safeguarding the countryside from encroachment and encouraging the recycling of derelict and other urban land.'

6. ALLOCATION OF A CAMPUS EXTENSION OF SUFFICIENT SIZE

6.1 The process of establishing an extension site to campus east in the emerging York local plan is outlined in extracts from successive City Council documents dating from 2014. These are contained in appendix 3. It should be noted that the City Council has accepted the need for a campus extension but not in a location and quantum that meets the University's needs. The difference between the Council's 21.5ha site and the University's preferred 26ha site is not just 4.5ha of developable area. The Council's site requires a wide landscape buffer to the busy A64 outer ring road and retains only 13ha for development. The University's proposed site includes the 13ha but adds an additional field to the west to create a 26ha extension, all of which would

be developable. A 30ha landscape buffer is proposed to the south, in land in the control of the University.

- a. **Further Sites Consultation June 2014:** this extract from the résumé of submissions to the Council shows the campus extension in the location proposed by the University. It is allocated for education and stated to be 28ha. A wide landscape buffer to A64 is also included.
- b. **Site Selection Paper Addendum September 2014:** this extract shows the same two allocations but the campus extension is now defined as an employment allocation and stated as 25ha, (the boundaries were the same). The campus extension was excluded from green belt but the landscape buffer was not.

The commentary confirms that the site access proposals, taking access from the campus east spine road, is likely to be acceptable; service infrastructure and drainage can be provided; known environmental issues associated with air quality, noise, light pollution and contamination can be mitigated. It also confirms that the speculative commercial development (science park) had been delayed by the wider economic downturn.

- c. **Local Plan Publication Draft Proposals Map South September 2014:** the excerpt shows the allocations described above. This plan was acceptable to the University and because it would be defined by field boundaries, would provide a defensible green belt boundary. The area of land proposed was considered to be just about sufficient for the University's planned needs, however, it was not progressed further due to political changes at the Council. No new evidence base seems to have been prepared to warrant the change of view on the part of the City Council.
- d. **Preferred Sites Consultation July 2016:** The review of the emerging local plan showed a reduced area for the extension to 21.5ha by excluding the field on the western side of the previous draft allocation. The justification was to increase the distance between the site and the village and also to provide a defined green belt boundary which helps to maintain views into the southern aspect of York and the setting of Heslington.

- e. **Officers' Assessment of Employment Sites** following Preferred Sites Consultation, as presented to Local Plan Working Group, 10 July 2017. This reported consultation responses from the June 2016 PSC, based on ST27, the 21.5ha site.

Officers suggested that consideration is given to increasing the allocation to 26ha to provide approximately 26,000sqm of employment floorspace based on an approximate 10% employment use along with 3 x 650 bed colleges and an academic research facility to meet the needs of the University over the plan period.

An accompanying plan illustrated the extent of the landscape buffer to A64 required to mitigate the impact of university development on the 21.5ha site. Deducting a 1.1ha field inside the western boundary which is outside the control of the University, the resulting allocation is 13ha and the buffer is 7ha.

- f. **Local Plan Working Group meeting 10 July 2017** on the Preferred Sites document. Agenda Supplement Item 4, Local Plan Points of Clarification: The map for the 21.5ha site should be replaced with the attached map, the 26ha site. **Officers suggest that the site could be extended to the previous 2014 Publication Draft boundary.**

For the second time, officers recommended to Members that the 26ha site should be included in the emerging local plan. This was not adopted by Members, though no written response to the decision is available, nor any reasons as to why a different view was taken.

- g. **Preferred Sites Consultation Statement September 2017** reporting on Preferred Sites Consultation July 2016: this recounted the responses to the consultation, including support and objection submissions. The University objected to the ST27 allocation in favour of the 26ha site. Other objections included impacts on agricultural land, the views from A64 and nature conservation. Historic England stated that the proposal would harm the special character of the historic city by affecting prominent views from A64 and the inclusion of a landscape buffer which could be an alien feature.

- h. **Pre-Publication Draft Local Plan Proposals Map South** (excerpt) September 2017: This plan was included in the PPC, which includes ST27 and a suggested boundary to the green belt around campus east and the extension. Draft policies were also included at

this stage. The University again objected to the allocation but the wording of the policies was generally acceptable.

- i. **Annex A: Pre-Publication Consultation Statement September 2017:** this statement was reported to LPWVG on 23 January 2018 on consultation responses, including policy SS22 related to site ST27. The gist of the University's objection was that the policies which rightly strongly support the continued expansion are not translated into an adequate land allocation. The development site proposed for the next 20 years will not provide the security which the University needs for long term planning and therefore will not meet the Council's own policies on growth of the University and expansion of the York economy. Not to do so will cause serious problems for the University over the plan period. The objection stated that 26ha was required up to 2038 to allow for green belt permanence.

In relation to site ST27 the text stated "Based on the consultation comments and technical evidence submitted, officers propose including a revised boundary increasing the allocation to 26ha in total to provide approx. 26,000sqm of employment floorspace and 3 x 650 bed colleges and an academic research facility to meet the needs of the University over the plan period. (page 157).

It is not known precisely what evidence this statement intends to cross refer to.

- j. **Local Plan Working Group 23 January 2018:** The officer's report proposed a change to draft plan of site ST27. "Given comments made about economic growth Members may wish to consider increasing the employment land supply." Table 6 included a potential change to ST27 from 21.5ha to 26ha. (Para. 37)
- k. Members did not accept officers' recommendation and the extension site ST27 remains that land adjacent to A64T, east of the University's preferred allocation.

6.2 In these circumstances the University is again making its representations to the consultation process to secure an expansion allocation which meets its growth needs in the period to 2038.

7. OPTIONS CONSIDERED FOR THE EXPANSION OF THE UNIVERSITY

7.1 The University's case for promoting a larger allocation based upon the scale of an extension site for campus east is made by the Director of Estates, by reviewing recent growth rates against the University's future growth strategy. A range of growth scenarios has been tested, (appendix 4). Other than a very low growth rate of 0.5-1.0%, the justification is established for a campus extension. A wide range of factors govern the growth rate and many are outside the control of the University. Funding for research facilities is often opportunistic, demand for student places from overseas students may be affected by Government policy and funding for home students is currently being reassessed so that demand for undergraduate places may fluctuate. However, based on growth rates between 2009 and 2017 of 4%p.a., a very low growth rate is considered to be highly unlikely.

7.2 The case for an extension site is accepted by Members and officers of the Council and as such policies in the Publication Plan promote the growth of the University, (see section 5). However, the quantum and location currently proposed are not justified by the Council nor accepted by the University. Unless adequate space is allocated to meet the University's needs to 2038, it will not be possible to achieve a sound local plan because green belt boundaries cannot be confirmed until the plan meets the identified requirements for sustainable development (NPPF para 85). Such needs self-evidently include the needs of the University in the particular circumstances of York.

7.3 In order to demonstrate that a larger allocation is indeed needed, a range of options to meet the growth needs have been considered, these are:

- o Considering a satellite site or sites for expansion
- o Increasing the density of development on campus west
- o Increasing the density of development within developed sites on campus east
- o Increasing the density and/or height of development on undeveloped sites on campus east, from the 23% footprint and the building heights approved in the outline permission
- o Considering development in the landscape buffers on campus east

Criteria for selection of an expansion site

7.4 In 2002/3 when expansion beyond campus west was actively being considered, criteria for assessing possible expansion sites were addressed in detail. This was because there was no local plan in an advanced stage of preparation, and so there was no presumption of achieving an expansion site allocation in a timescale to suit the University's needs. Such an adjacent site was included in the East Riding development plan 1967 and the emerging Selby Local Plan in 1996. At local government reorganisation in 1996 the City Council accepted the principle of Selby Council's draft allocation but by 2003 York's draft local plan was abandoned and an LDF was in preparation.

7.5 These criteria are presented below, categorised as (i) academic and social; (ii) operational; (iii) qualitative; (iv) external policy-related. In principle, the criteria are all still relevant to a search for expansion space.

Table 1: Criteria considered for selection of an expansion site

CATEGORY	CRITERION	OBJECTIVE
i) Academic and social	1 Proximity	Create strong sense of community and shared purpose within the University
		Minimise travel times for staff and students between different activities on either campus, as in original master plan; thus avoiding need for duplication of facilities (eg, library, administrative and student services)
	2 Integration	Allow for continued integration of diverse activities (eg, teaching, research, innovation and knowledge transfer, student housing, sport, leisure) through close location
	3 Consolidation	Prevent fragmentation of activities (eg dividing academic departments between locations)
	4 Inter-disciplinarity	Facilitate interdepartmental and interdisciplinary activities through geographical proximity, in order to extend and develop new programmes of study and fields of research
	5 Innovation and knowledge transfer	Facilitate innovation and enable the commercial exploitation of academic ideas and research; create links between business and academic interests
	6 Widening participation	Support the University's widening participation agenda, including lifelong learning
	7 Accessibility	Provide feasible external access and transport links, including for disabled users
	8 Shared facilities	Enable the University to provide excellent facilities, including facilities for sport, leisure and culture, for students, staff and local communities.
ii) Operational	9 Land availability	Be available within the University's development timescale and free from competition from other land users
	10 Land ownership	Be acquirable from current owners

	<i>11 Size</i>	Be of sufficient size to meet the University's long-term needs and to accommodate a full range of activities (eg, teaching, research, innovation and knowledge transfer, student housing, sport, leisure)
	<i>12 Phasing</i>	Allow for phasing of development over a protracted period, given uneven patterns of growth in HE and unpredictable sources of funding, both from government and private enterprise
	<i>13 Affordability</i>	Be affordable in terms of capital outlay and provide good value for money
	<i>14 Operating costs</i>	Minimise recurrent operating costs both of the estate and University activities; avoid duplication of facilities
	<i>15 Site constraints</i>	Be free from constraints which dominate or inhibit use
	<i>16 Sustainability</i>	Be sustainable in respect of design and operation
iii) Qualitative	<i>17 Landscape</i>	Develop a distinctive design aspect while retaining the existing landscape-dominated character
	<i>18 Image</i>	Make a statement about the University as internationally competitive, research intensive, and committed to excellent teaching in a collegiate environment
	<i>19 Architecture</i>	Create high quality working, living and leisure environments
	<i>20 Siting</i>	Be located in a visually and structurally pleasing setting
	<i>21 Attractiveness/affordability</i>	Provide location, facilities and environment that are attractive and affordable to funders and users
	<i>22 Visitor venue</i>	Provide location, facilities and environment that are attractive and affordable to conference organisers and delegates, including those engaged in lifelong learning, and to other visitors
iv) External policies	<i>23 Education policies</i>	Meet objectives of HEFCE, DfES and DTI in relation to teaching and research
	<i>24 Planning policies</i>	Not displace any other necessary uses as identified in City of York Local Plan
		Be compatible with planning policies on environmental issues
		Be compatible with surrounding land uses; not unacceptably disrupt or prevent neighbouring uses
	<i>25 Transport policies</i>	Meet national, regional and local policy objectives
<i>26 Economic policies</i>	Meet national, regional and local policy objectives on role of universities in economic development	

Alternative sites considered

7.6 Owing to the absence of an adopted local plan for the city added to an encircling green belt boundary, very little development land is currently available. The city has not had the benefit of large areas of brownfield land due to its industrial past based mainly on railways and

confectionary. Suitable land either side of the general extent of the green belt tends to be already secured of the development of housing, employment or other uses and is not available for university use. Many sites would be too small to be feasible. More remote sites would be more expensive and inconvenient to operate as a satellite. A wholesale relocation of the University would be catastrophic, given that the link to the City is one of the University's important selling points, and moreover it would mean losing the substantial investment that has been made over the last half a century. Thus wholesale relocation has not been considered further. The sites that have been considered at this time are those included in the emerging local plan, listed below with a commentary on each.

Table 2: Alternative sites considered

Site Location	Size ha	Planning status, competing land uses	Availability	Accessibility and transport implications	Constraints to meeting University criteria
ST1 British Sugar/ Manor School	46.3	Developable within plan period 1-16 years Application for residential development submitted.	Owned by developer. Not likely to become available for educational use.	Poorly related to existing campus, 7.0km distant, resulting in an increase in cross-city private vehicle traffic.	Due to distance there would have to be duplication of facilities as campus would have to be largely self-contained. The site is not reasonably available due to ownership and application for residential development.
ST5 York Central	35	Developable within and post plan period 1-21 years The City Council has identified the site for residential and employment use.	Owned by York Central partnership. Not likely to become available for educational use.	Well linked to train and bus services from the city centre. Poorly related to existing campus 4.2km distant resulting in an increase in cross-city traffic.	The site is not reasonably available as it is subject to a major residential and employment redevelopment scheme.

ST7 Land East of Metcalfe Lane	34.5	<p>Developable within plan period 1-16 years</p> <p>The City Council has identified the site for residential use.</p>	<p>Owned by developer. Not likely to become available for educational use.</p>	<p>Well-related to campus and outer ring road but poorly located with respect to public transport and cycling routes to the existing campuses.</p>	<p>The site is not reasonably available and is not easily accessible by public transport and cycling routes.</p>
ST8 Land North of Monks Cross	39.5	<p>Developable within plan period 1-16 years</p> <p>Application for residential development submitted.</p>	<p>Owned by developer. Not likely to become available for educational use.</p>	<p>Well-related to outer ring road but remote from cycling routes. Significant distance from city centre and existing campus 9.2km</p>	<p>The site is not reasonably available due to application for housing development. It is not easily accessible from the existing campus.</p>
ST9 Land North of Haxby	35	<p>Developable within plan period 1-16 years</p> <p>The City Council has identified the site for residential use.</p>	<p>Owned by developer. Not likely to become available for educational use.</p>	<p>Poorly related to existing campus, 9.1km distant resulting in an increase in cross-city private vehicle traffic.</p>	<p>Due to distance there would have to be duplication of facilities as campus would have to be largely self-contained.</p>
ST14 Land West of Wigginton Road	55	<p>Developable within and post plan period 1-21 years</p> <p>The City Council has identified the site for residential use.</p>	<p>Owned by developer. Not likely to become available for educational use.</p>	<p>Poorly related to existing campus 7.2km distant, resulting in an increase in cross-city private vehicle traffic.</p>	<p>Due to distance there would have to be duplication of facilities as campus would have to be largely self-contained.</p>

ST15 Land West of Elvington Lane	159	Developable within and post plan period 1-21 years The City Council has identified the site for residential use.	Owned by Developer. Not likely to become available for educational use.	Remote from highway network, bus routes and amenities. Significant distance from city centre and existing campus 8.7km.	Due to distance there would have to be duplication of facilities as campus would have to be largely self-contained.
ST35 Queen Elizabeth Barracks, Strensall	28.8	Developable medium to long-term 6-15 years The City Council has identified the site for residential use.	In use by MoD until 2021. Not likely to become available for educational use.	Poorly related to existing campus 10.1km distant resulting in an increase in cross-city private vehicle traffic.	The site is still in use by MoD and will not be available in the short-term.
ST36 Imphal Barracks, Fulford Road	18h	Developable post plan period – 16-21 years The City Council has identified the site for residential use.	In use by MoD until 2031. Not likely to become available for educational use.	The site is well-related to the existing campus at 2.2km and connected to public transport and cycle networks.	The site is still in use by MoD and will not be available in the short to medium term.

The following sites are considered too small to accommodate a new campus, and they would result in fragmentation of university activities:

ST2	Civil Service Sports Ground Millfield Lane	10.4ha
ST4	Land adjacent to Hull Road	7.54ha
ST16	Terry's Extension Site – Phases 1, 2 and 3)	2.18ha
ST17	Nestle South (Phase 1)	2.35ha
ST17	Nestle (Phase 2)	4.7ha
ST19	Land at Northminster Business Park	15ha
ST31	Land at Tadcaster Road, Copmanthorpe	8.1ha
ST32	Hungate (Phases 5+)	2.17ha
ST33	Station Yard, Wheldrake	6ha
ST26	Land South of Airfield Business Park, Elvington	7.6ha /25,080m ² floorspace
ST37	Whitehall Grange, Wigginton Road	10.1ha/33,330m ²

7.7 However, what has become a focus arises from experience over the last 9 years of the huge advantages of adjacency in operating the University. The two campuses are within easy walking and cycling distances of each other and, due to a free bus service of 7 minutes frequency, getting around between residences, academic departments and sports and social facilities has proved convenient. This is also a major advantage for maintenance and servicing of each campus. An example is the district heating system which serves both campuses, but the more ephemeral interchange of staff (teaching and otherwise) and students is the most critical. A satellite campus would increase the problems experienced by staff and students at the city centre Kings Manor campus who have to factor in time and cost to travel between the city centre and Heslington. Due to the cost of buses to the city centre, which are not free, many students walk and this time has to be timetabled.

7.8 On this evidence it is concluded that there is no available alternative site for the establishment of a university campus. Moreover at no stage has an alternative solution been identified by the City Council.

Increasing development density: Campus west

7.9 This option has been considered for both campuses. The planning policy context is set within a character of a landscape dominated campus with low density development. Campus west is set at 20% footprint for buildings and car parks but this is proposed to be raised to 23% in the Publication draft local plan. The range of floorspace to be accommodated from the low growth to high growth scenarios is 24,000m² (GIA) to 96,000m² (University evidence). An analysis of campus west to establish whether increased density would be feasible was carried out for the 2006 Inquiry. In looking to accommodate the 266,000m² at that time, the Planning Inspector concluded (para 652):

"In order to accommodate the proposed floorspace on those parts of the existing campus that could reasonably be redeveloped, a footprint %age of 39% would be required assuming most buildings would be 4 storey. Such a density of development would significantly harm the character and appearance of the area. If the present footprint cap were retained, then buildings some 9 storeys high would be required, a solution which would also be visually unacceptable.

A more realistic scenario would be to retain the existing 20% footprint, which I consider to be important in terms of maintaining the attractive character of the campus and to maintain the setting of the neighbouring Conservation Area, and to maximise the amount of development that can take place on the campus by using multi-storey car parking and demolishing existing low rise buildings and replacing them with 4-storey buildings. The campus could then accommodate some 25% of the whole development planned for Heslington East.

However, in my view, the more realistic and acceptable scenario would be to develop the sites identified [in evidence] at an average of 3.5 storeys while retaining the 20% footprint. Such an approach would provide less than 12% of the accommodation required at Heslington East.”

7.10 This conclusion is remains valid bearing in mind the planning policy context in draft policy ED2 controlling the landscape dominated character.

Increasing development density: Campus East

7.11 The master plan document, Development Options and Masterplan for Extension Site (MAKE Architects) investigates this option. It states that:

“The overarching masterplanning philosophy for both campuses is that of evolving a low density and landscape dominated university. Many of the existing collegiate and academic buildings on campus east are large buildings that need space to express themselves. It would be harmful to the original masterplan philosophy and the design intention of these buildings to build between them. Any future development is therefore better suited to currently undeveloped sites, for example to the western and eastern ends of the campus.

Beyond the 65ha ‘allocated area’ for development, options for providing additional areas for the anticipated future growth are restricted: three of the four landscape buffers cannot be altered. To the west of the existing campus sits small-scale properties of Heslington and to the north the landscape rises up towards Badger Hill housing development. Any closer development would certainly dominate these neighbouring villages and consideration must be given to protecting the character and amenity of both. Finally, the area to the east of the campus is already developed for indoor and outdoor sports facilities. Extending south of the existing lake, therefore forms the most appropriate area for future expansion.

7.12 The final option considered is increasing the density and heights of buildings in the areas allocated for development in campus east. This would involve revisiting the planning permission granted. Apart from the low density character common to both campuses, the building heights have been set after consideration of the topography and views out of and into the campus. Higher buildings are allowed on the northern side of the allocated area. This is because the ground rises to the north and buildings will be seen with the raised ground as a backdrop. Lower heights are set closer to the lake so that views over buildings to the lake and the Yorkshire Wolds beyond are available.

7.13 In conclusion, the University is satisfied that no alternative site is available to cater for a development of this size and nature, and that extending close to the existing campus affords many academic, operational and financial benefits. The high quality built and natural environment that is so important to attract students and staff alike are vital to the viability of the University. These characteristics continue to be the basis of all development projects. Infilling development would cause major harm to these characteristics and would be contrary to the outline planning permission granted, where it was concluded that this character was appropriate to the location and type of development.

8. COMPARISON OF SITE ST27 AND THE 26HA SITE

8.1 This section assesses the appropriateness of the two potential expansion sites in meeting the needs of the University for expansion space during the plan period to 2038. It references the statements of the expert witnesses in the various topic areas that accompany this planning statement. The criteria considered are those in section 7.

8.2 **Academic and social aspects:**

The social role of sustainable development is performed by supporting strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations and by creating high quality built environment, with accessible services that reflect the community's needs and support its health, social and cultural well-being, (NPPF para 7).

A major component in the forward planning and in the master planning for the University is the provision of enough student housing to meet the need and in consequence free up houses in the private rented sector for the use of local families. Creation of a high quality environment is also a

priority in the adopted Design Brief and Master Plan, in order to attract high quality students and staff. Social and cultural facilities are not only provided for students and staff but many facilities and activities are open to the general public.

8.2.1 **Proximity:** As the master planning document illustrates, ST27 is further from the centre of campus east. The intention is to install footbridges across the lake, as at campus west. The 26ha would have its own critical mass but being centrally located opposite campus east, pedestrian and cycle routes would provide convenient trips across the lake and onwards to campus west. It would be more likely to generate a sense of community amongst student residents.

8.2.2 **Integration:** the objective is to continue integration of diverse activities across the campus extension. As ST27 only provides 13ha of developable land, the dominant needs are likely to be catered for rather than a range of uses being accommodated.

8.2.3 **Consolidation and inter-disciplinarity** are related to geographical proximity where the larger site gives more scope to meet this objective.

8.2.4 **Knowledge transfer:** the larger site gives greater scope to accommodate knowledge-led businesses. The draft policy SS22 allows the 25ha of knowledge led businesses to be located across the campus and the extension. The policy also requires investigation of synergies with the housing site ST15. Their scheme involves creation of a new junction on A64 which could be shared between ST15 and ST27. This would give direct access to the campus extension which is likely to be attractive to business users. Due to University practice of car free campuses, with parking on the peripheries, such business traffic would be prevented from travelling through campus east.

8.2.4 **Accessibility:** as described in the transport report, the main access will be from Lakeside Way, the spine road on campus east. Despite significant growth in the University's population, the success of the travel plan has led to car traffic reducing in recent years in favour of sustainable modes, so much so that the traffic generation levels approved for campus east planning permission will not be exceeded by providing the larger extension site. As stated above, should the direct A64 access become available, this would strictly be on the basis of a cul-de-sac for business traffic.

8.2.5 **Shared facilities:** campus east is fully open to the public in terms of its external areas and the indoor and outdoor sports facilities. This would be extended to the campus extension. The 26ha site would be more physically convenient to local communities than the more remote ST27.

8.3 Operational aspects

One role in the achievement of sustainable development is an economic role which is performed by contributing to building a strong, responsive and competitive economy. This is achieved through the planning system by its ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation, (NPPF para 7). The 26ha site by its size and location would make a much greater contribution to achieving sustainable development than ST27 could.

8.3.1 **Land availability:** the University has a legal agreement with the land owner of the area of the 26ha and also the 30ha landscape buffer to the south. This land is available for occupation when the need arises.

8.3.2 **Size:** the criterion is that site is to be of sufficient size to meet the University's long-term needs and to accommodate a range of activities, e.g. teaching, research, innovation and knowledge transfer, student housing, sport and leisure. The 26ha site will be adequate to cater for all but the most ambitious growth scenarios. The ST27, affording only 13ha developable area is likely to have a high threshold cost to commence development of the site and restricted scope on what could be accommodated.

8.3.3 **Phasing:** once the threshold cost has been reached, development of the 26ha can be phased across the plan period to accommodate the opportunistic nature of Higher Education funding sources. ST27 is not predicted to satisfy demand for accommodation during the plan period and objectives in the University strategy are likely to be frustrated.

As recounted in the Economic Benefits evidence, this would not only affect the University's own success but would also impact on the City Council's Economic Strategy and the regional economy. By the extension site being allocated as an employment site rather than an education site, as in the past, the Council is acknowledging its role in the city's economy. Draft policy EC1 proposes the extension site to deliver up to 25ha of knowledge based businesses across both campus east and the extension. The scope to meet this objective would be greatly inhibited if the smaller site is adopted.

8.3.4 **Affordability:** the University objective is to achieve an affordable site and provide good value for money. This could be a constant across the two sites since the landowner is the same.

8.3.5 **Operating costs:** To be minimised. Servicing costs will be lower by area on the larger site and result in a lower threshold cost.

8.3.6 **Site constraints:** to be free from constraints which dominate or inhibit use. The major constraint of the ST27 is its proximity to the A64 bypass. Large scale university development adjacent to the route would be inappropriate due to its impact on the landscape but small scale buildings would not meet the space needs that are predicted. For the users of the University buildings, constant traffic noise would inhibit enjoyment of the outdoor spaces. Hence the 7ha landscape buffer proposed by the Council in 2016.

Since the 26ha site is set back, the whole site is available for development. The one exception is a 1ha field east of Green Lane which is outside the control of the University. If this is not acquired in the future a route around it to the north is achievable.

8.3.7 **Sustainability:** Economic and social sustainability have been address above. An environmental role is performed by contributing to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use of natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy. This agenda has been wholeheartedly embraced by the University and the design and operation of the campus extension will meet these objectives.

8.4 **Qualitative**

This criteria includes landscape, architecture, siting and attractiveness and also image.

8.4.1 **Landscape:** As described in the Landscape evidence, in both development scenarios, an area of arable farmland would be lost but in neither case is this considered significant as the landscape is of low/medium sensitivity. Both sites are influenced by proximity to settlement and contain urban elements such are pylons and communications masts and are also affected by proximity to A64. None of the local landscape effects identified is considered significant (i.e. moderate of above) for either site. This is partly a reflection of the design of the proposed development and partly of the character of the landscape. The new campus is designed to ne low density and low rise and would be set within a designated parkland setting with linear belts of woodland along much of the perimeter to help screen views particularly from Heslington and the Heslington conservation area. In conclusion, the report states that the effects of the proposed development on either allocation site would result in broadly similar landscape effects, none of which is considered to be significant.

8.4.2 **Architecture and siting:** The University would meet its objectives of creating a landscape dominated campus to result in a visually pleasing setting. The architecture can create high quality working, living and leisure environments but this would be the case in either location.

8.4.2 **Attractiveness:** the combination of the location of the 26ha site across the lake from the campus east development, its accessibility for pedestrian and cyclists and to the frequent bus route make this a very attractive prospect for University expansion, when campus east no longer has space to accommodate further development.

8.5 **External policies;** Education polices are outside the scope of this planning statement, but planning, transport and economic policies are within its scope.

8.5.1 **Planning policies:** The proposal for an extension to campus east complies with emerging policy in the Publication draft local plan. Both sites under consideration are within the broad sweep of the York Green Belt but in confirming the inner boundaries for the first time, the Council must ensure that development needs for sustainable development are met. To not cater for the identified development needs of the University by allocating the 26ha site, the Publication Draft Local Plan is likely to be found unsound.

8.5.2 **Transport policies:** the University has been amazingly successful in the implementation of its green travel plan. Tables 1 and 2 in the Transport Statement illustrate how, despite a 4% growth in populations of staff and students, the percentage of users of private cars has declined from 30.2% to 22.5%. Cycle and pedestrian trips have increased as has bus travel. Only 400 of the approved 1500 car parking spaces have been provided. This is in line with national and local transport policies. The campus extension will be subject to the same travel plan initiatives and it is anticipated that the trends in travel modes will continue.

8.5.2 **Economic policies:** The role of the university in economic development is described fully in the paper on Economic Benefits from the Expansion of the University of York. The conclusion is that by restraining effective expansion t site ST27 this will curtail growth plans and so future economic contribution in three ways:

- o By limiting the amount of student and academic accommodation that can be built out and associated scale of the University
- o By constraining the amount of business space for “associated business activities” and the ability for the area of campus east to provide for “B1b knowledge based businesses including research led science park uses” and

- o By limiting the expansion of its research and associated business collaboration and knowledge transfer activities which are so important for the future economic growth of York and its surrounds in sectors such as biotechnology, bio-renewables, agri-tech and IT/digital.

The report has quantified the direct measurable potential “loss” to the York economy in the future from sticking to allocation ST27 as around 1,100 fte jobs and £50 million in annual income/GVA. However, this is an indicative figure only. More importantly it does not capture the knock on consequences on the wider economic role of the University if it is unable to expand as it could do.

9. OTHER ISSUES OF REPRESENTATION

9.1 This section relates to the proposed boundary to the green belt and designation of landscape areas in and around campuses. The University supports in principle the removal of campus west from green belt. It also supports the removal of the allocated area for development at campus east from green belt. The plans in appendix 5 illustrate areas of contention and the alternative boundaries proposed by these representations, which comply with the approved campus east master plan and/or guidance on setting green belt boundaries.

9.2 In relation to campus west, the green belt boundary is proposed to include a short street of housing Walnut Close, north of Heslington Lane. This would bring green belt adjacent to the southern side of the campus and could inhibit development proposals adjacent to this boundary. This short cul-de-sac is surrounded by development on all four sides. It has no openness to preserve and cannot have. It thus cannot perform a green belt purpose. It is proposed that Heslington Lane be the defensible green belt boundary, (See plans in appendix 5)

9.3 Campus east has a current planning permission including an approved master plan which define areas where development is permitted and areas of structural landscaping, (see plans 1.4 and 1.5). The green belt boundary proposed by the Council intrudes into these areas in certain locations. It is considered inappropriate for the draft local plan to attempt to amend the approved boundaries. The alternative boundaries proposed are attached, (appendix 5 plans 5.2 and 5.3).

9.4 In relation to the proposed allocation of an extension site for campus east, the boundaries promoted and the landscape buffer are illustrated (plan 5.1). It is proposed that the green belt boundary is drawn around the western and southern sides of the extension site and that the buffer zone be within green belt, (plan 5.3). This provides defensible boundaries along existing field boundaries.

9.5 In terms of the landscape designation, it is considered unnecessary to include the 14ha lake in campus east within this designation. Firstly, it could not be developed other than for the installation of footbridges to link the northern and southern sides. Secondly, the southern shore is designated landscape in the adopted masterplan and adopted landscape master plan. However, outline planning conditions 11 and 12 allow for the updating of the master plans. Should the University's preferred extension site be accepted, then the option to amend the master plans and include lakeside development as part of the campus extension development is not precluded by these outline planning conditions. The local plan proposals map is not able to over-ride the outline planning conditions.

10. CONCLUSIONS

10.1 It is considered that this evidence, together with the six other submitted statements of evidence, clearly make the case to justify the larger, 26ha extension site for campus east. Guidance in NPPF (para 14) states that local authorities should positively seek opportunities to meet development needs in their area unless specified policies in the Framework indicate development should be restricted, such as land designated as green belt. This draft local plan will establish the inner boundaries of green belt for the city for the first time. Should the Council's proposed boundaries be adopted, then the legitimate and evidenced demands for an adequately sized extension site for campus east would be frustrated.

10.2 Since 2014, officers have consistently recommended to Members that the University's preferred site be allocated. Inexplicably, the Council has produced no evidence to support the published boundaries of ST27. On the basis of not providing for the University's predicted growth needs, the Publication Draft local plan is considered to be unsound.

10.3 The Inspector is respectfully requested to support the University's proposed allocation.

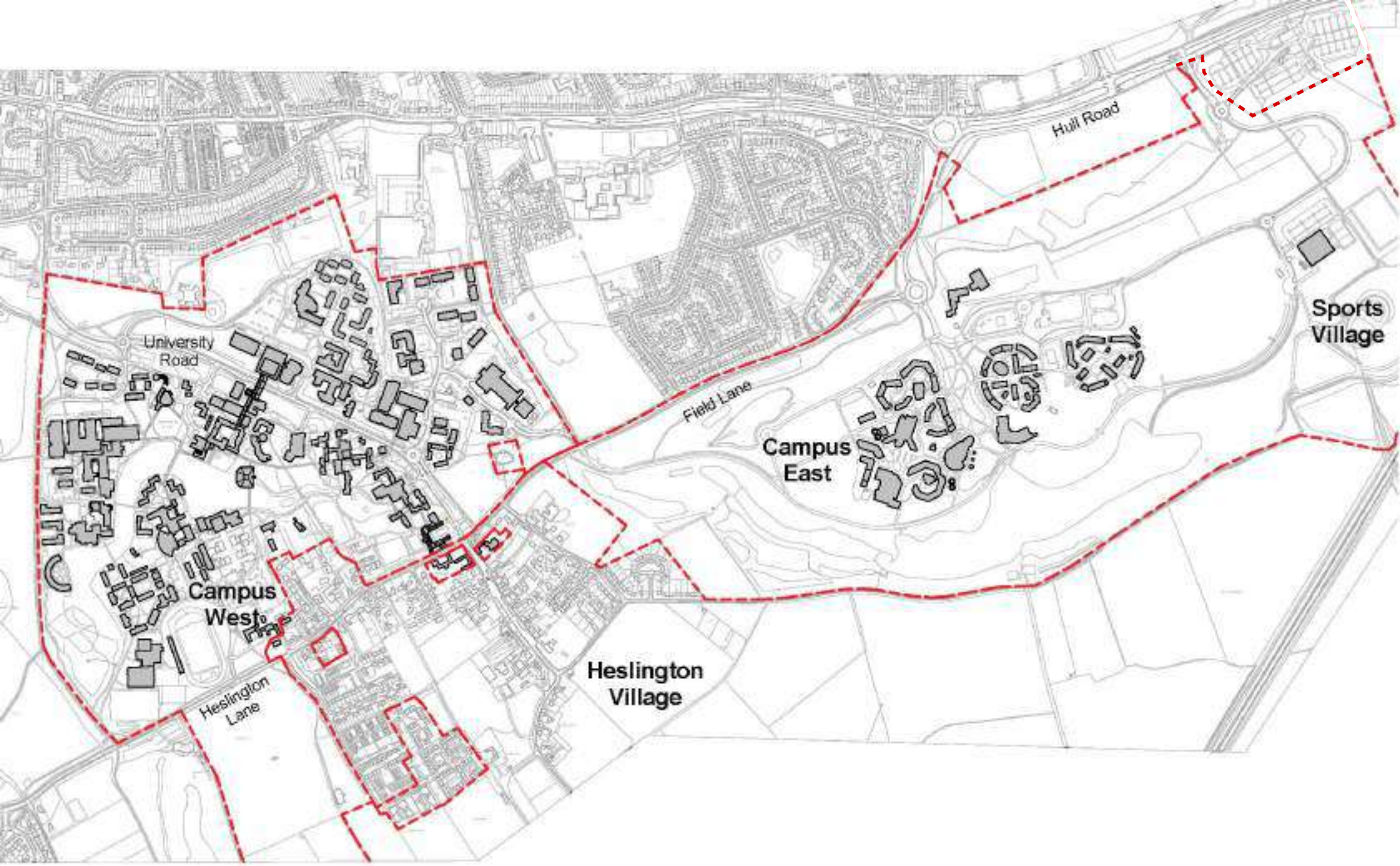
APPENDIX I

Campus Plans:

- I.1 boundaries of campuses
- I.2 campus west as existing
- I.3 campus west development brief
- I.4 campus east allocated area for development, 2004
- I.5 campus east approved masterplan 2011

APPENDIX I

I.1 boundaries of campuses

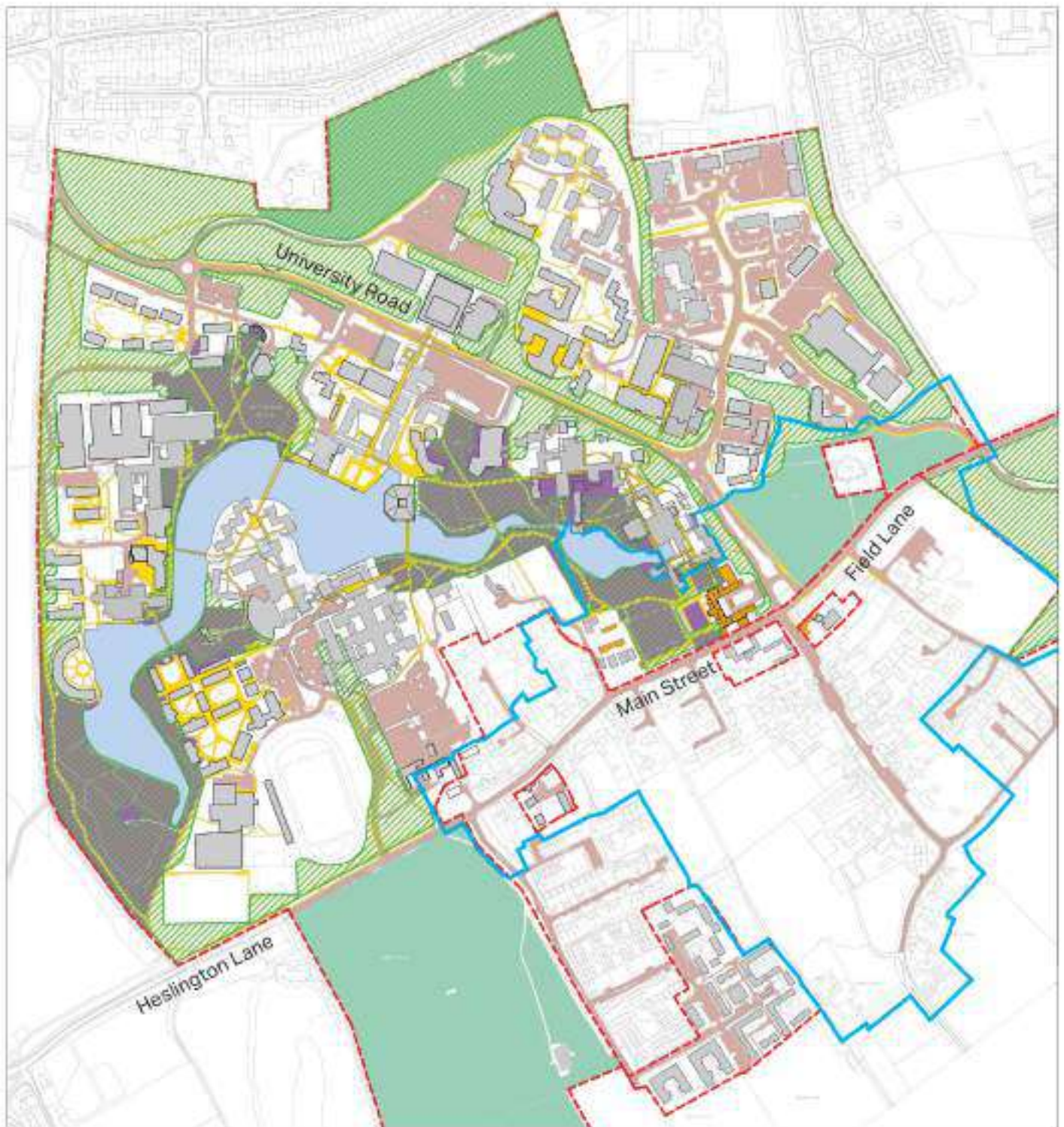


APPENDIX I

1.2 campus west as existing

Development Plan

Campus West as existing



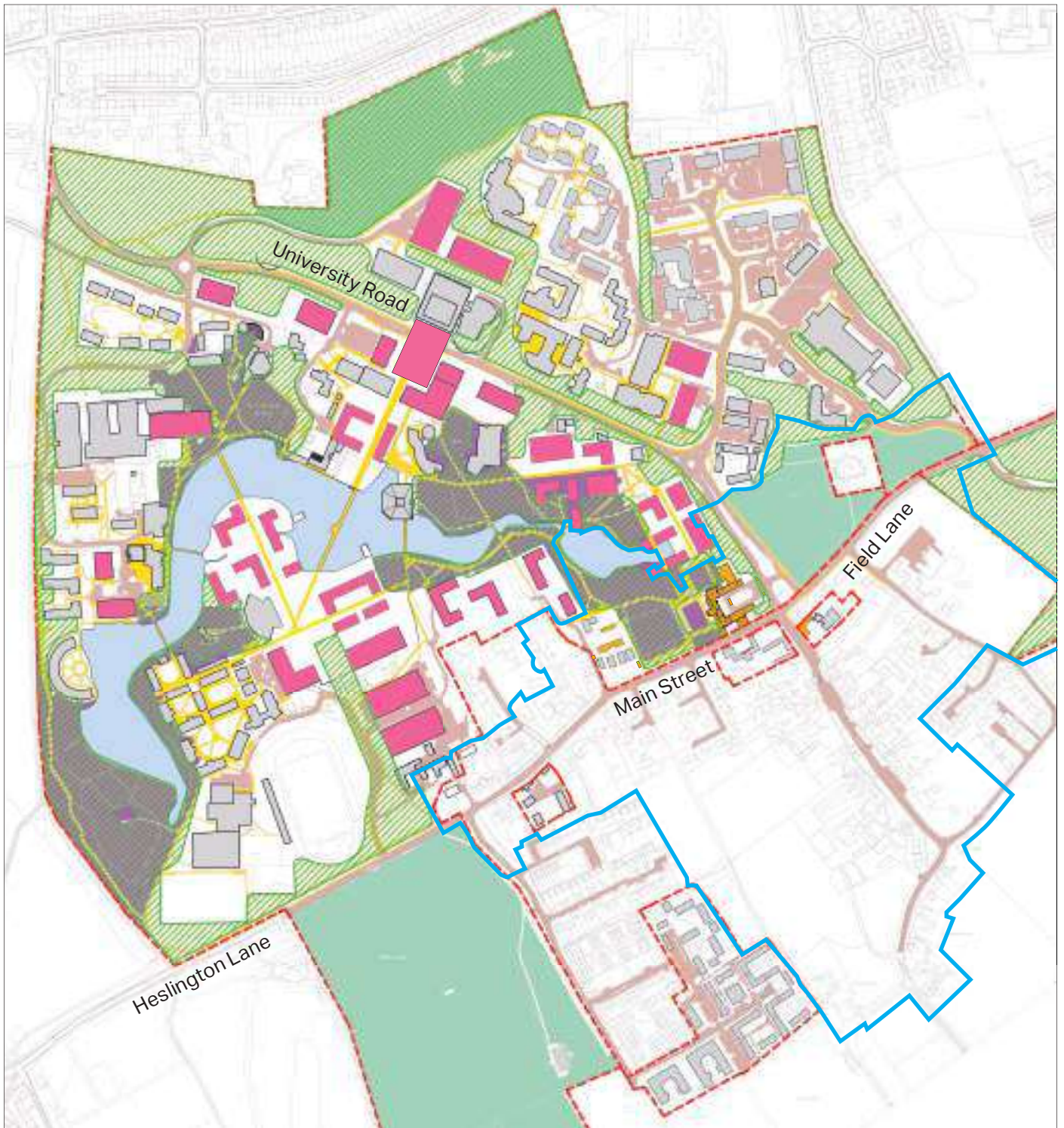
- Important open spaces
- Open space relating to lake
- Roads & car parks
- Framework tree belts, avenues, open banks & grass
- Existing buildings
- Listed buildings and features
- Footpaths
- University Estate boundary
- Conservation Area boundary

APPENDIX I

I.3 campus west development brief

Development Plan

Campus West

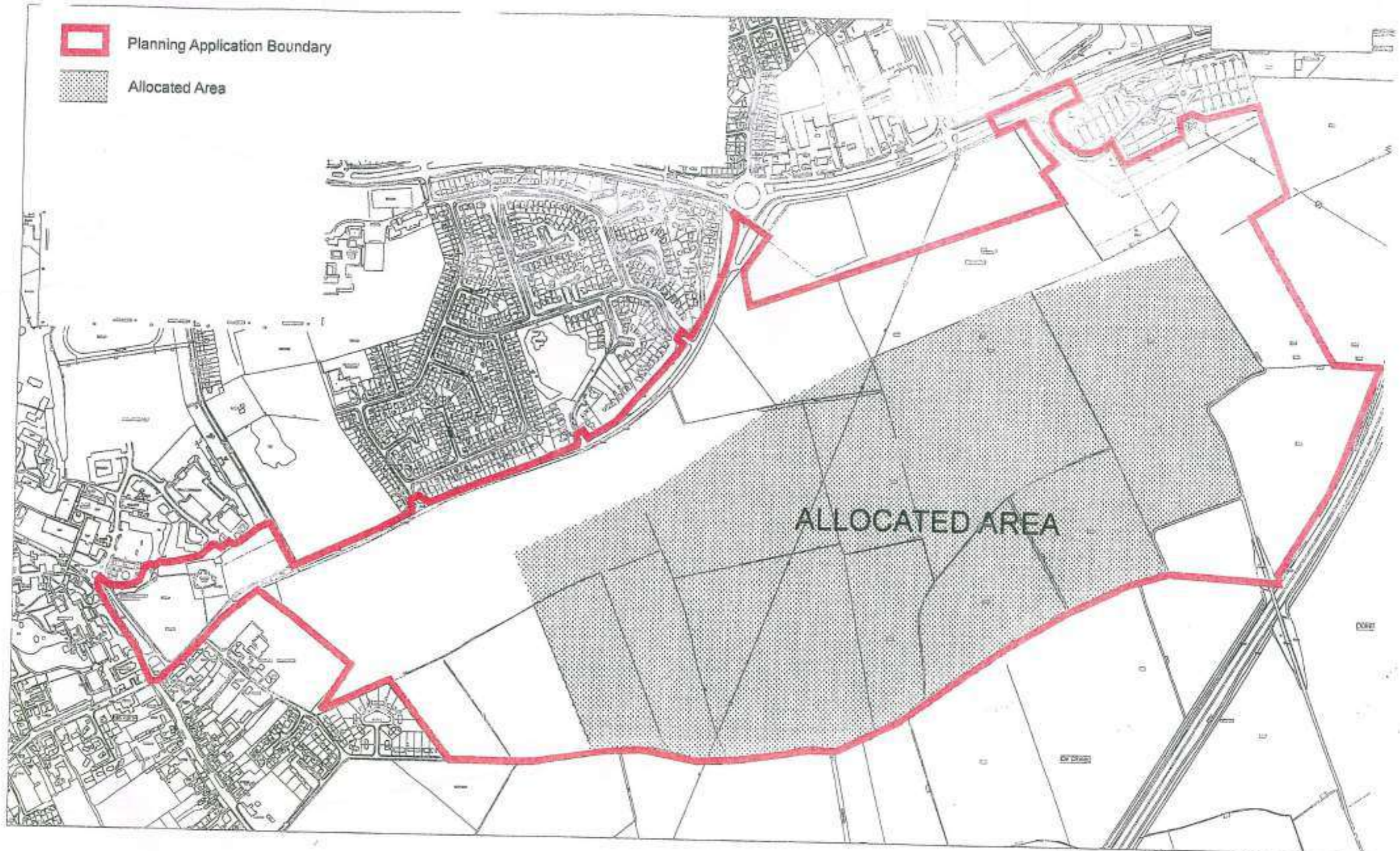


- Important open spaces
- Open space relating to lake
- Roads & car parks
- Framework tree belts, avenues, open banks & grass
- Existing buildings
- Listed buildings and features
- Potential development areas- renovation or redevelopment
- Footpaths
- ⋈ University Estate boundary
- Conservation Area boundary

APPENDIX I

I.4 campus east allocated area for development, 2014

 Planning Application Boundary
 Allocated Area



ALLOCATED AREA

Project	Drawing	Drawing No.	Scale	DR	PV	04.12.03	B
University of York	Planning Application Boundary		N.T.S	DR	PV	03.12.03	A
Heslington East Campus	Allocated Area			DR	PV	01.09.03	
				Drawn by	Appr'd by	Date	Rev.

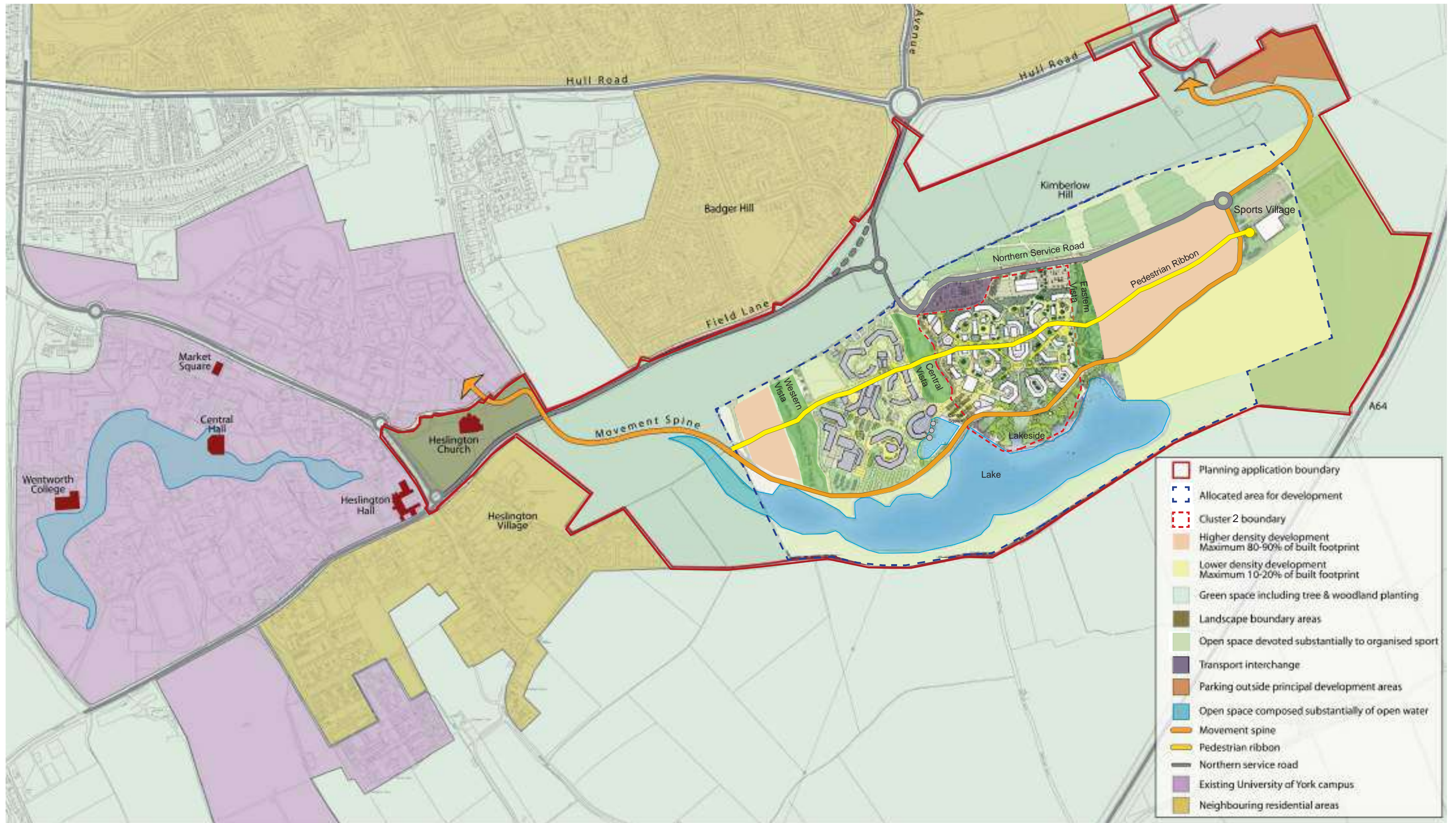
2 William Robson House
 Claypath
 Durham City
 DH1 1SA
 Tel: +44 (0)191 375 7075
 Fax: +44 (0)191 375 7122

CASELLA
 STANGER

PLAN A

APPENDIX I

1.5 campus east approved masterplan, 2011



Updated campus master plan diagram (Dec 2010)

APPENDIX 2

Regional Spatial Strategy documents:

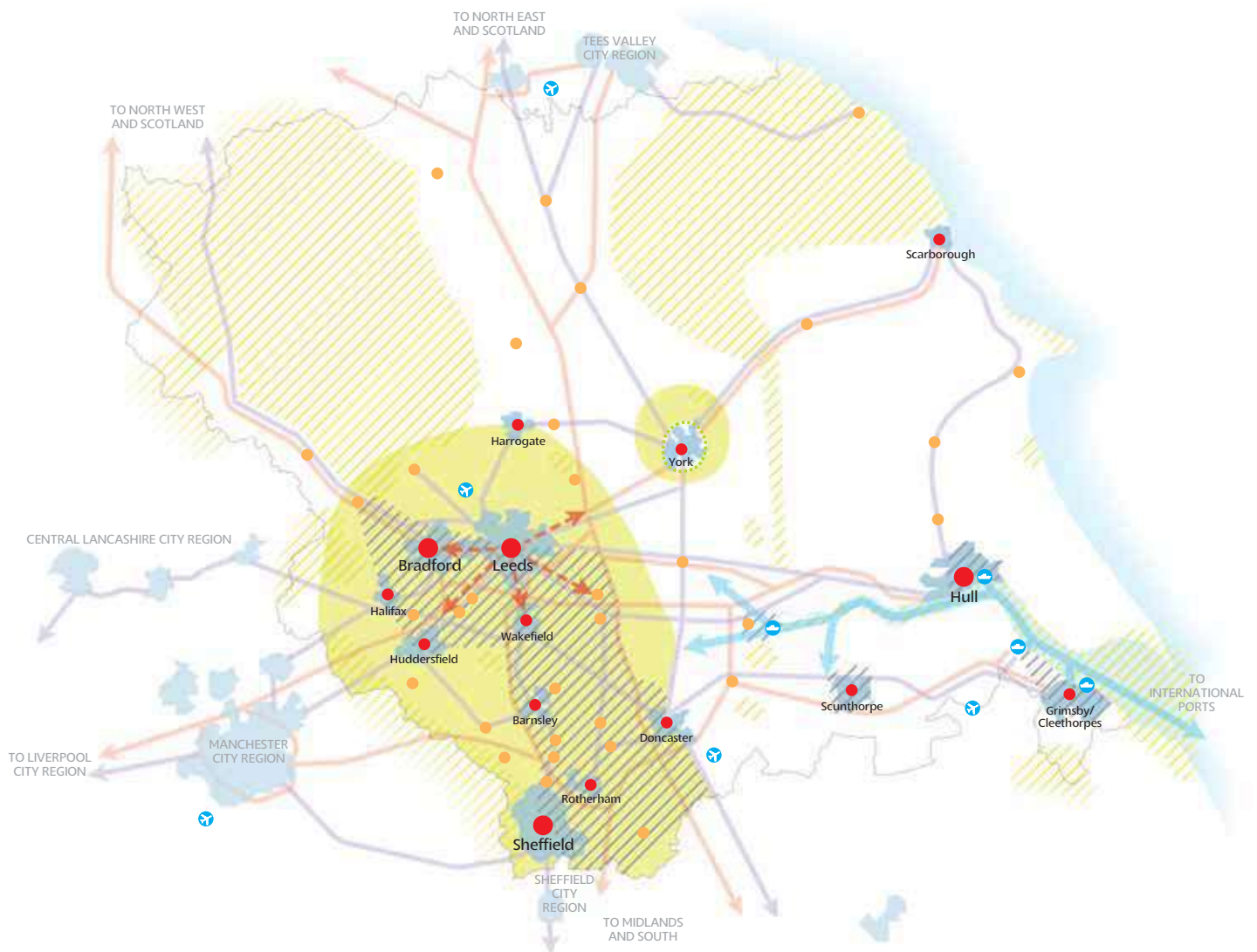
- o Yorkshire & Humber Plan (May 2008) - Policies YH9 and Y1
- o Regional Strategy for Yorkshire & Humber (Partial Revocation) Order 2013



GOVERNMENT OFFICE
FOR YORKSHIRE AND THE HUMBER

The Yorkshire and Humber Plan

Regional Spatial Strategy to 2026



May 2008

POLICY YH9: Green belts

- A** The Green Belts in North, South and West Yorkshire have a valuable role in supporting urban renaissance, transformation and concentration, as well as conserving countryside, and their general extent as shown on the Key Diagram should not be changed.
- B** Localised reviews of Green Belt boundaries may be necessary in some places to deliver the Core Approach and Sub Area policies.
- C** The detailed inner boundaries of the Green Belt around York should be defined in order to establish long term development limits that safeguard the special character and setting of the historic city. The boundaries must take account of the levels of growth set out in this RSS and must also endure beyond the Plan period .
- D** A strategic review of the West Yorkshire Green Belt may be required to deliver longer term housing growth as set out in Table 12.1 in locations that deliver the Core Approach and the strategic patterns of development set out in policy LCR1E.
- E** Green Belt reviews should also consider whether exceptional circumstances exist to include additional land as Green Belt.

OUTCOMES

The general extent of the Region's Green Belt has not changed.

Green Belt boundaries allow sustainable development to be delivered in accordance with the Core Approach.

Green Belt around York has been defined and the setting of the historic city protected

INDICATORS

Net change in Area of Green Belt in the Region

How many Local Authorities have undertaken a Green Belt Review and why

Whether the Green Belt around York has been defined in an LDF.

LEAD ROLES

Local authorities

MAIN MECHANISMS

LDFs

- 2.62** The general extent of the Green Belts in the Region is shown on the Key Diagram. In general the Region's Green Belts have helped to achieve the aims set out in paragraph 15 of PPG2, and implementation of the Plan should not require any change to their general extent. However, there may be a more specific and localised need to reconsider the extent of Green Belt to meet identifiable development needs for which locations in Regional and Sub Regional Cities and Towns are not available and for which alternative sites would be significantly less sustainable. Any such changes ought to be considered in the context of policies YH1-YH7, and is allowed for by policy YH9B.
- 2.63** The detailed inner boundary to the York Green Belt, and parts of the outer boundary, have not been designated in a development plan. This is therefore covered by policies YH9C and Y1C1.²
- 2.64** The Plan proposes significant growth in the Leeds City Region, including increased housebuilding in West Yorkshire from 2008 onwards. It is possible that the most sustainable locations to accommodate some of this development may currently be within the Green Belt. This will have to be considered through the preparation of LDFs, taking account of policies YH4-YH7 and LCR1E. The local authorities in West Yorkshire are encouraged to work together and with the

² Policies YH9C and Y1C1 replace Policy E8 of the North Yorkshire Structure Plan extended under transitional provisions of Schedule 8 to the Planning Compulsory Purchase Act 2004.

Section 6

York

POLICY Y1: York sub area policy

Plans, strategies, investment decisions and programmes for the York sub area should:

A Roles and functions of places

1. Ensure the roles and function of places in the York sub area complement and support those described in the Leeds City Region
2. Develop the role of York as a Sub Regional City and support the roles of Selby and Malton as Principal Towns

B Economy

1. Diversify and grow York as a key driver of the Leeds City Region economy by encouraging the business and financial services sector, knowledge and science-based industries, leisure and retail services and the evening economy, and further developing its tourism sector
2. Spread the benefits of York's economic success to other parts of the sub area and ensure that all members of the community have access to employment opportunities
3. Deliver economic growth at Selby and Malton in line with their roles as Principal Towns
4. Identify and safeguard a site for the Spallation project, in the vicinity of Selby

C Environment

1. In the City of York LDF, define the detailed boundaries of the outstanding sections of the outer boundary of the York Green Belt about 6 miles from York city centre and the inner boundary in line with policy YH9C.
2. Protect and enhance the nationally significant historical and environmental character of York, including its historic setting, views of the Minster and important open areas
3. Protect and enhance the particular biodiversity, landscape character and environmental quality of the York sub area – including the 'Vales' area, Humberhead Levels area, the Derwent Valley area, the Wolds, Howardian Hills AONB, and protect the integrity of internationally important biodiversity sites
4. Help to mitigate flooding through proactive planning and management and provide appropriate protection, especially in York and Selby
5. Avoid depleting the Sherwood Sandstone aquifer
6. Improve air quality, particularly along main road corridors in York (based on AQMAs)

Continued

POLICY Y1: York sub area policy *continued***D** Transport

1. Develop the role of York as a key node for public transport services for the sub area
2. Implement stronger demand management in York and in relation to the strategic highway network
3. Improve accessibility to and within York, particularly by improved facilities for walking and cycling, increased capacity and quality of public transport, and new park and ride facilities
4. Improve public transport links between Local Service Centres and other rural communities and York and the sub area's Principal Towns
5. Improve access between York and Scarborough / the east coast

E Strategic patterns of development

1. Focus most development on the Sub Regional City of York, whilst safeguarding its historic character and environmental capacity
2. Promote development at Selby to foster regeneration and strengthen and diversify its economy within the Leeds City Region
3. Support an appropriate scale of development at Malton to support local regeneration and the role of York
4. Elsewhere in the sub area, use a managed approach to development to focus on meeting local housing needs and appropriate economic diversification

F Regionally significant investment priorities

1. Develop the sub area economy with major new development and initiatives including Science City York, York Northwest, further developing and expanding York University and supporting the SPALLATION Project at Selby
2. Manage flood risk in line policy ENV1 along the Ouse at York and Selby, in the Derwent Valley, and in the Humberhead Levels area

G Joined up working

Promote partnership approaches to economic diversification, regeneration, housing distribution, development and flood risk management throughout the York sub area

2013 No. 117

TOWN AND COUNTRY PLANNING, ENGLAND

The Regional Strategy for Yorkshire and Humber (Partial Revocation) Order 2013

<i>Made</i>	-	-	-	24th January 2013
<i>Laid before Parliament</i>				29th January 2013
<i>Coming into force</i>	-	-	-	22nd February 2013

The Secretary of State, in exercise of the powers conferred by section 109(1) of the Localism Act 2011(a), makes the following Order:

Citation, commencement and application

1.—(1) This Order may be cited as the Regional Strategy for Yorkshire and Humber (Partial Revocation) Order 2013 and shall come into force on 22nd February 2013.

(2) This Order applies in relation to England only.

Partial revocation of Regional Strategy

2.—(1) The Regional Strategy for Yorkshire and Humber comprises—

- (a) the regional spatial strategy for the region (“the RSS”)(b); and
- (b) the regional economic strategy for the region (“the RES”)(c).

(2) The Regional Strategy for Yorkshire and Humber is revoked except for

- (a) the policies of the RSS set out in the Schedule to this Order (“the RSS York Green Belt policies”), and
- (b) the Key Diagram of the RSS insofar as it illustrates the RSS York Green Belt policies and the general extent of the Green Belt around the City of York.

(a) 2011 c. 26.

(b) The Yorkshire and Humber Plan Region’s Spatial Strategy to 2026, published in May 2008 as required by section 1 of the Planning and Compulsory Purchase Act 2004 (c.5). Under Part 5 of the Local Democracy, Economic Development and Construction Act 2009 (c.20), section 1 of the 2004 Act was repealed and the RSS became part of the regional strategy for the region from 1st April 2010. Part 5 of the 2009 Act was partially amended and partially repealed by sections 109 and 117 of, and paragraphs 18 and 19 of Schedule 8 and Part 1c of Schedule 25 to, the Localism Act 2011 (c.20). These amendments and repeals took effect on 15th November 2011, except for the repeal of sections 70(5), 82(1) and 121 which will be commenced on a day to be appointed. Section 63 of the 2009 Act was repealed by section 30(1) of, and Schedule 6 to, the Public Bodies Act 2011 (c.24).

(c) The Regional Economic Strategy for Yorkshire & Humber 2006-2015, published in 2006 by Yorkshire Forward, the Yorkshire and Humber Regional Development Agency, as required by section 7 of the Regional Development Agencies Act 1998 (c.45). Section 7 of the 1998 Act was substituted by section 43 of the Local Democracy, Economic Development and Construction Act 2009 (c.20) and is repealed by section 104(7) of, and paragraph 2 of Schedule 8 to, the Localism Act 2011 (c.20) on a day to be appointed. Under Part 5 of the 2009 Act, the RES became part of the regional strategy for the region from 1st April 2010. Part 5 of the 2009 Act is partially amended and partially repealed as set out at (b) above.

Signed by authority of the Secretary of State for Communities and Local Government

24th January 2013

Nick Boles
Parliamentary Under Secretary of State
Department for Communities and Local Government

SCHEDULE

RSS York Green Belt policies

Article 3

POLICY YH9: Green belts

C The detailed inner boundaries of the Green Belt around York should be defined in order to establish long term development limits that safeguard the special character and setting of the historic city.

POLICY Y1: York sub area policy

Plans, strategies, investment decisions and programmes for the York sub area should:

C Environment

1. In the City of York LDF, define the detailed boundaries of the outstanding sections of the outer boundary of the York Green Belt about 6 miles from York city centre and the inner boundary in line with policy YH9C.

2. Protect and enhance the nationally significant historical and environmental character of York, including its historic setting, views of the Minster and important open areas.

EXPLANATORY NOTE

(This note is not part of the Order)

Section 109 of the Localism Act 2011(a) abolished the regional planning tier by repealing Part 5 of the Local Democracy, Economic Development and Construction Act 2009(b) (which only applied in relation to England). This includes the removal of the responsible regional authorities. Section 109 also made provision to revoke or partially revoke, by order, the eight existing regional strategies.

This Order makes use of those powers to partially revoke the regional strategy for Yorkshire and Humber, which comprises The Yorkshire and Humber Plan Regional Spatial Strategy to 2026 ("the RSS") and the Regional Economic Strategy for Yorkshire & Humber 2006-2015. Policies in the RSS which relate to the Green Belt around the City of York are retained. The Key Diagram from the RSS is retained insofar as it illustrates the retained York Green Belt policies and the general extent of the Green Belt around the City of York. The Key Diagram can be found after page 214 of the RSS. A copy can be obtained from the Planning Directorate, Department for Communities and Local Government, Eland House, Bressenden Place, London, SW1E 5DU.

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(a) 2011 c. 20.
(b) 2009 c. 20.

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APPENDIX 3

City of York Council Emerging Local Plan 2014 to 2018 background documents:

- a) Further Sites Consultation, June 2014
- b) Site Selection Paper Addendum, September 2014
- c) Local Plan Publication Draft Proposals Map South (excerpt), September 2014
- d) Preferred Sites Consultation, July 2016
- e) Officers Assessment of Employment Sites following Preferred Sites Consultation - as presented to Local Plan Working Group, 10 July 2017
- f) Item 4, Local Plan Points of Clarification - Local Plan Working Group meeting, 10 July 2017
- g) Preferred Sites Consultation Statement, September 2017
- h) Pre-Publication Draft Local Plan Proposals Map South (excerpt), September 2017
- i) Annex A, Pre-Publication Draft Local Plan Consultation Responses – as presented to Local Plan Working Group meeting, 23 January 2018
- j) Report of the Assistant Director of Planning and Public Protection (excerpt) – as presented to Local Plan Working Group meeting, 23 January 2018
- k) Publication Draft Local Plan Proposals Map South (excerpt), February 2018

APPENDIX 3

3(a) Further Sites Consultation, June 2014



YORK

**CITY OF YORK
LOCAL PLAN
Further Sites Consultation
June 2014**

9. New Education Sites

The Council received sites for consideration for educational purposes through the Preferred Options Local Plan. These sites have been subject to technical analysis (for further details please see Appendix10).

The following sites are considered to have potential for educational use.

Site Ref:	794
Site Name:	University Expansion
<p>Crown Copyright. City of York Council. Licence No: 1000 20815. Produced by Forward Planning</p>	
Submitted for:	Education
Site Submitted:	28 ha
Recommendation:	To include this site for expansion at the University of York and for related Science City uses. Existing Strategic Site ST4 is also shown on the map and is considered to have potential for student housing linked to the University of York.

APPENDIX 3

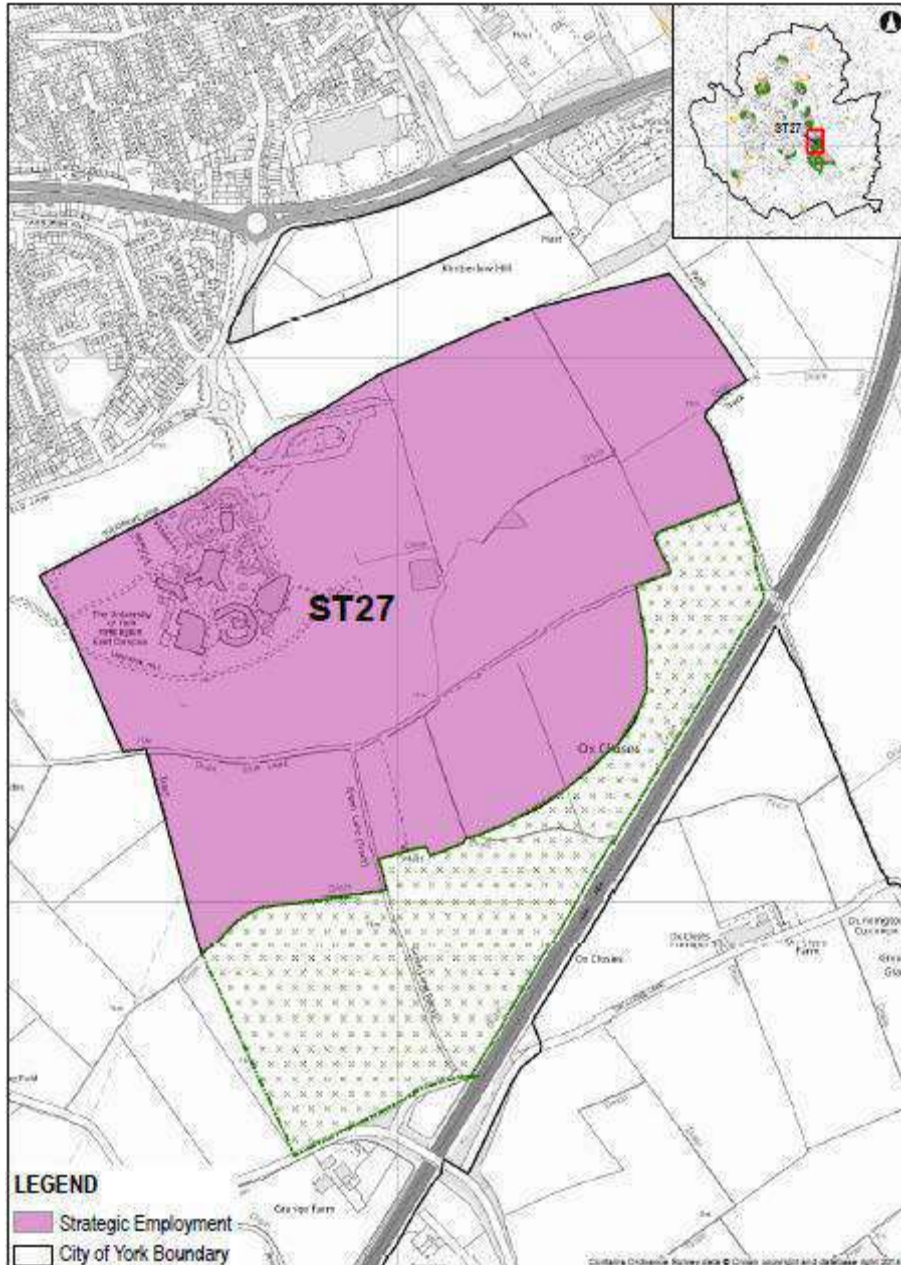
3(b) Site Selection Paper Addendum, September 2014



YORK

**CITY OF YORK
LOCAL PLAN
Site Selection Paper Addendum
September 2014**

Site Reference	ST27
Site Name	University of York Expansion
Site Size	25ha



Site Allocation Approach Description
 It is proposed that land identified on the proposals map be allocated for university expansion (incorporating education facilities, student accommodation and ancillary employment uses) over the plan period.

Site Allocation Approach Justification
 Work to date indicates that the land is controlled by willing landowners and is free of fundamental constraints to delivery.

The proposed allocation boundary reflects the comprehensive masterplan approach being pursued by site promoters in order to meet evidenced needs over the plan period.

On the basis of this proposed allocation approach, technical work to date indicates that:

- Site access proposals as set out in current masterplan work are likely to be acceptable, a sustainable transport approach is deliverable and network impacts are mitigable.
- It is feasible and viable to provide service infrastructure (including energy supply, water, open space and community facilities) for the site.
- It is feasible and viable to provide site drainage infrastructure compliant with Local Plan policy
- Known environmental issues associated with Air Quality, Noise, Light Pollution and Contamination have been subject of technical assessment and are considered to be mitigable through masterplan approach and planning agreements.

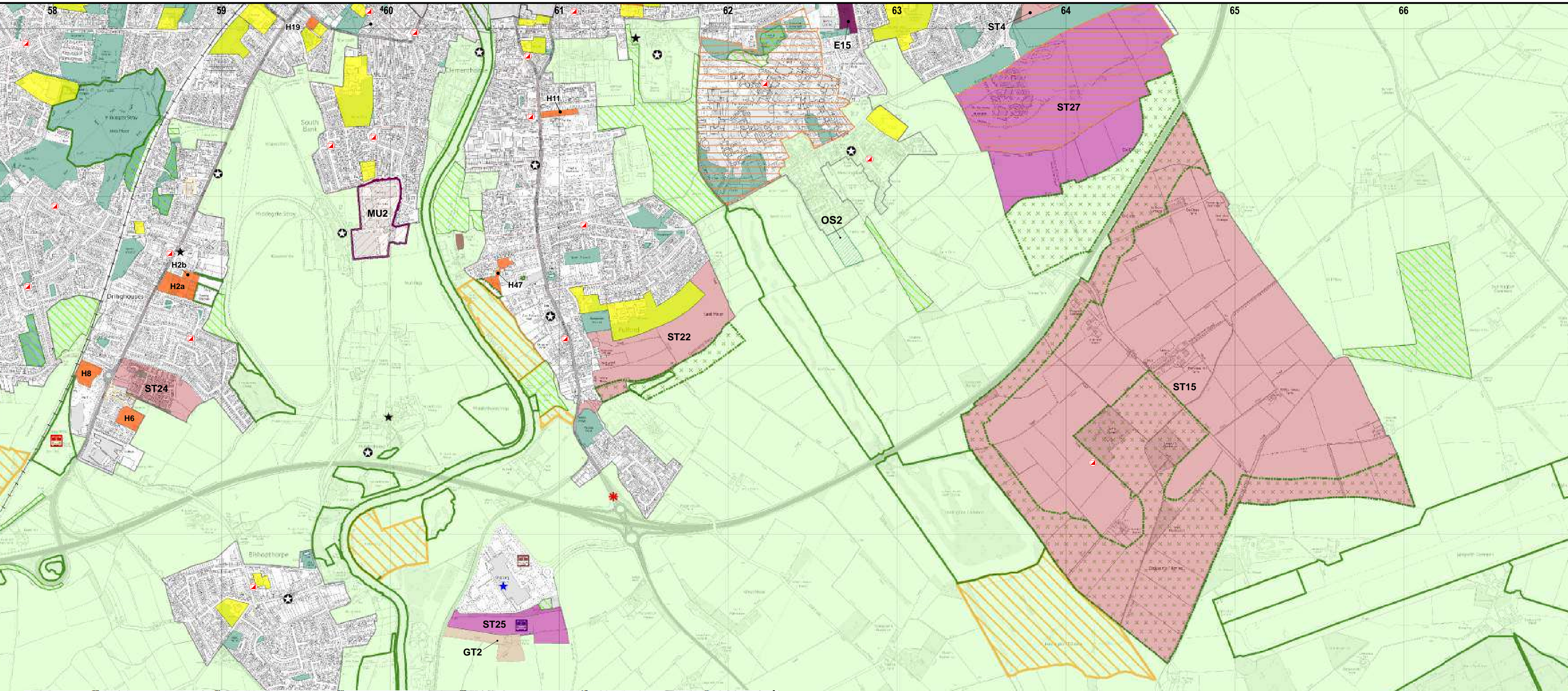
Whilst viability assessment indicates that speculative commercial development is not currently viable, this is not as a result of existing or proposed policy requirements set out by the Council (which are minimal in any case), rather being a factor of wider economic conditions and their impact on development values, which are anticipated to improve over the lifetime of the plan. Student housing associated with this scheme is found in assessment to be viable, and will play a role in the off-setting of any cost implications for employment uses.

Heritage Impact Assessment indicates that the site may cause partial-minor and partial harm to characteristics 2,4 and 5, which can be mitigated through masterplan approach and planning control. Serious harm to principal characteristic 6 is also identified due to the potential loss of open countryside – affecting the rural setting of the city and the close proximity of the development to Heslington. The assessment recommends screening and development extent approaches to mitigate impacts, which will be explored in detailed masterplanning and planning processes. Extensive strategic greenspace is identified on the proposals map in association with this site. The assessment identifies the benefits of development as potentially outweighing greenbelt harm.

It will be essential that an open landscape setting, as well as landscape screening, be provided in terms of views of the site and therefore city setting from the A64 to the south and the east

APPENDIX 3

3(c) Local Plan Publication Draft Proposals Map South (excerpt), September 2014



KEY TO PROPOSALS MAP

Background (Section 1)	Housing (Section 5)	Historic Environment (Section 8)	Transport (Section 14)
City of York Boundary	Proposed Gypsy and Travellers Site	Conservation Areas	Existing Park Ride Sites which may be expanded (T2)
Spatial Strategy (Section 3)	Proposed Travelling Showpeople Yard	Area of Archeological Importance	Existing Park Ride Sites which maybe relocated (T2)
Safeguarded Land	Strategic Housing	Green Infrastructure (Section 9)	Proposed New / Relocated Park and Ride Sites (T2)
Settlement Boundary	Mixed Use Site	Existing Open Space (GI1, GI3, GI5)	Highway Improvement (T4)
Strategic Greenspace	General Housing Sites	New Open Space (GI6)	Public Transport Highway Improvements (T2)
Economy and Retail (Section 4)	Community Facilities (Section 6)	Sites of Local Interest for Nature Conservation (GI1, GI2)	Freight Consolidation Centre (T9)
Strategic Leisure	Existing Health Care Facilities	Sites of Importance to Nature Conservation (GI1, GI7)	Existing Strategic Cycle Network (T5)
Strategic Employment	Education (Section 7)	Nationally Significant Nature Conservation Site (GI2)	Proposed Improvements to Cycle Routes (T5)
District Retail Centres (R1, R2)	Educational Establishment	Managing Development in the Greenbelt (Section 10)	Potential Tram / Train Route (T2)
Local / Neighbourhood Centres (R1, R2)	University of York	Greenbelt (GB1, GB3, GB4 & SS2)	Potential Dualling of York Outer Ring Road
General Employment			Safeguarded Land for Potential Future Scheme (T10)



APPENDIX 3

3(d) Preferred Sites Consultation, July 2016



YORK

CITY OF YORK
LOCAL PLAN
Preferred Sites Consultation
July 2016

Site Ref:	ST27	Site Name:	University of York Expansion Site
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Consultation boundary:



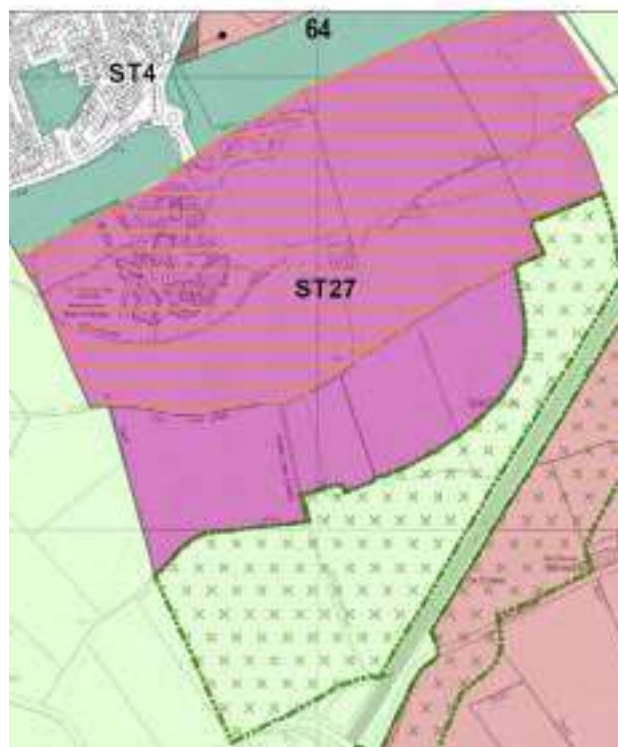
Site Size	21.5ha
Indicative Site capacity	20,000 sqm B1b employment floorspace for knowledge based activities and other higher education and related uses
Archetype/ Density	N/A
Proposed allocation	Allocated for university expansion during the plan period including 20,000 sqm of B1b employment floorspace for knowledge based activities and other higher education and related uses.

Site Ref:	ST27	Site Name:	University of York Expansion Site
Planning principles		<ul style="list-style-type: none"> • The site must create an appropriately landscaped buffer between the site and the A64 in order to mitigate heritage impacts and to maintain key views • The developed footprint (buildings, car parking and access roads) shall not exceed 23% of the total site area • The site should enhance and continue the parkland setting of the existing university campus and any new buildings must be of visual quality and good design • Provision of additional student accommodation provided this is clearly evidenced in terms of demand • Deliver high quality, frequent and accessible public transport services to York City Centre It is envisaged such measures will enable upwards of 15% of trips to be undertaken using public transport. • Optimise pedestrian and cycle integration, connection and accessibility in and out of the site and connectivity to the City and surrounding area to encourage the maximum take-up of these more 'active' forms of transport (walking and cycling). • Exploit synergies with the proposed new settlement (ST15 Land to the west of Elvington Lane) in terms of site servicing including transport, energy and waste. 	
Further Considerations			
Flood Zone	Flood Zone 1		
Agricultural Land Zone	Mix of Grade 2 and Grade 3a		
Commentary			
<p>The site has been reduced in size from the Publication Draft Local Plan (September 2014) from 25ha to 21.5ha. This has included the removal of land to the west of Green Lane to increase the distance between the site and Heslington Village and also to provide a defined green belt boundary which helps to maintain views into the southern aspect of York and the setting of Heslington village.</p> <p>The University of York is a key component of the long term success of the city and it is important to provide a long term opportunity for the University to expand. It offers a unique opportunity to attract businesses that draw on the Universities applied research to create marketable products. There is lots of evidence from around the country that shows the benefits of co-location of such businesses with a University. The University proposal is a key priority in the Local Economic Plan (LEP) Growth Deal that has been agreed with the government and is also included as a priority area in York's Economic Strategy which recognises the need to drive University and research led growth in high value sectors. The site will also facilitate the re-configuration of the existing Campus 3 site to provide additional on-campus student accommodation helping to reduce the impacts on the private rented sector.</p> <p>The existing Heslington East campus is designed and established to offer significant proportions of journeys by walking, cycling and public transport. Any future proposals must</p>			

Site Ref:	ST27	Site Name:	University of York Expansion Site
<p>continue this existing provision (including bus services). A detailed transport assessment and Travel Plan would be required to support this allocation.</p> <p>It is essential that an open landscape/parkland setting that reflects the existing University Campus is maintained and enhanced as well as appropriate landscape screening in terms of views to the site from the south and its setting from the A64 to the south and east.</p> <p>A broadly 4 sided site which is generally well contained on 3 sides. The northern boundary is Low Lane, a narrow single track country lane which runs from Heslington in an easterly direction, to the point where it turns northwards towards the University campus. The boundary treatment is a hedge with intermittent trees along its edge. From the point where Low Lane turns northwards, the site boundary heads south east towards the Ring Road and the flyover (track which leads towards Grimston Grange). This part of the boundary is denoted by a post and wire fence at the bottom of an embankment, over looking the new velodrome. From this point, the sites south east boundary runs along the alignment of the Ring Road in a south westerly direction (with hedge & ditch boundary), to the next field boundary, where it cuts across the southern edge of the site. This boundary consists of a hedge field boundary to the point where it meets Green Lane, a narrow track bounded by hedges and trees on both sides, to the point where it meets Low Lane. Green Lane forms the western boundary of the site. The site therefore has defensible green belt boundaries being generally well contained and is not considered to perform green belt purposes.</p> <p>The Heslington East Campus Extended Master Plan (June 2014) shows no additional entry points into the Campus from those already existing (Lakeside Way (bus and cycle only), Field Lane/Kimberlow Lane and Kimberlow Lane running south from Hull Road Grimston Bar Park & Ride link road. The Masterplan also refers to an 'Enhanced road junction for proposed Future Development', which is on the A64 to the south of the site. This proposed future development may provide an opportunity for a further 'restricted/limited' southern access to the University off the A64 (see also ST15). Access to the A64 would require approval of Highways England.</p>			
<p>SA/SEA summary</p>			
<p>This site is likely to provide 20,000sqm of floorspace and create between 500-1200 jobs. It is therefore likely to have a significantly positive impact on the economy. This site currently scores positively in relation services and transport given the proximity of the existing university campus. It also scores positively in relation to climate change given the potential for district heating. The site scores negatively in terms of land use given that the site is greenfield. The site is adjacent to the new lake at the Heslington East Campus and therefore is recognised to score more negatively in relation to proximity to water bodies. Although the site boundary has been reduced towards Heslington, there remains potential negative impact on the landscape given the site's location adjacent to the A64. Mitigation would be required to minimise impacts on the landscape and will require the development of a landscape strategy incorporated into masterplanning. In addition, there is known significant archaeological deposits in this area, which require further investigation to ensure appropriate mitigation is implemented.</p>			

Site Ref:	ST27	Site Name:	University of York Expansion Site
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The former boundary of this site which was consulted on at preferred Options and FSC:

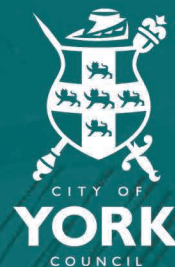


You told us at Preferred Options/ Further Sites consultations ...

- 40 objections**
- Little or no explanation of how traffic will be distributed. There should be no direct access from the site into Heslington village apart from Field Lane;
 - All existing public rights of way should be retained;
 - Loss of high quality agricultural land;
 - Site forms a vital part of the attractive setting of the city and Heslington village and would radically change the rural character of the area;
 - Disproportionally large scale development;
 - Would bring development within 130m of the ring road which will harm the character and setting of the city;
 - Heslington will cease to be a village.

APPENDIX 3

- 3(e) Officers Assessment of Employment Sites following Preferred Sites Consultation -
as presented to Local Plan Working Group, 10 July 2017



CITY OF YORK
Officers Assessment of
Employment Sites following PSC

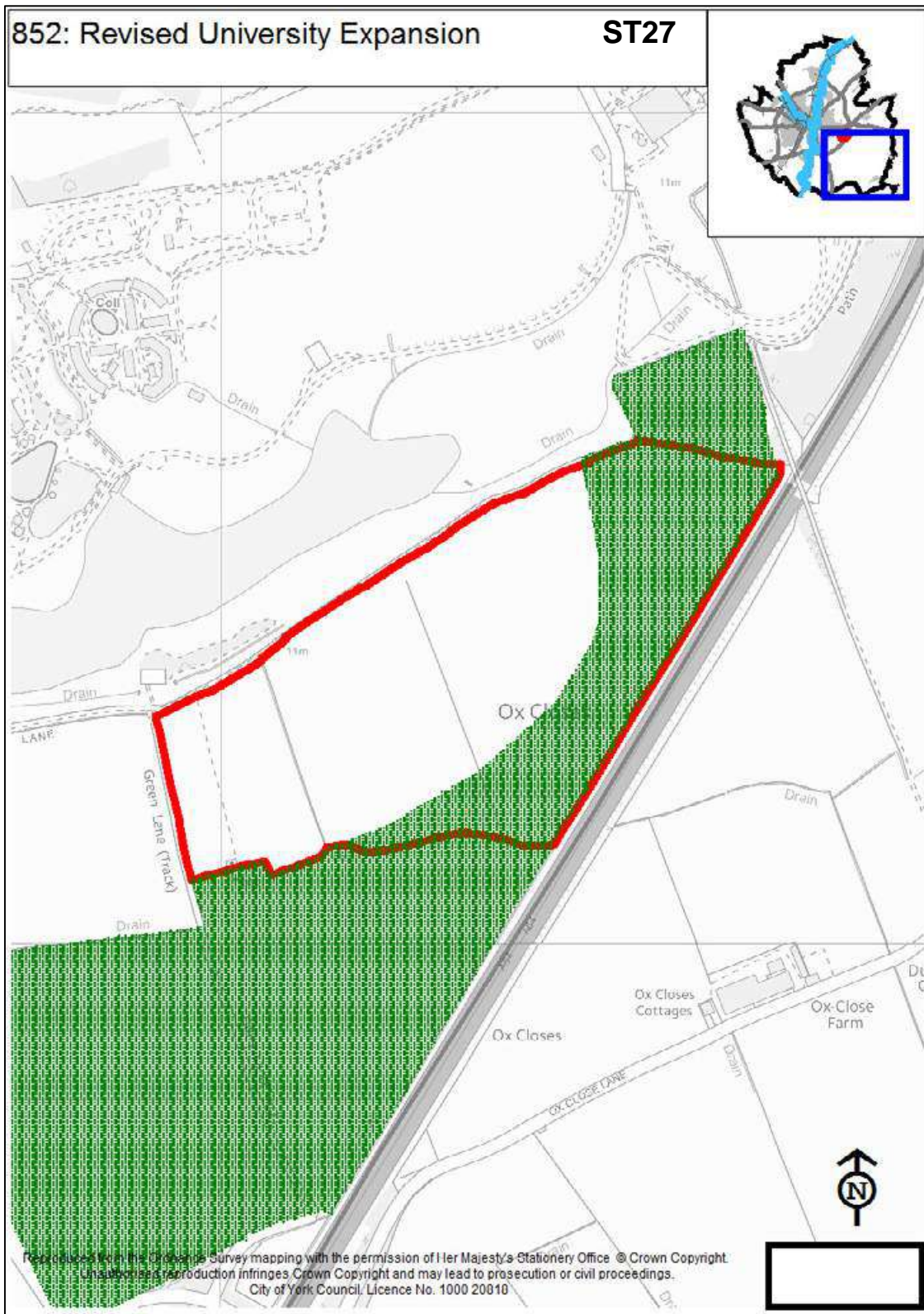
Allocation Reference	Site Name	Officer Commentary
ST26 cont.. (Site 97)		<p>relocating. The current business park is fully occupied except 1ha with extant consent for B2/B8.</p> <p>Technical officer assessment supports the larger allocation in principle to meet the identified demand and to provide choice and flexibility in the provision of employment land across the city.</p> <p>The site will require detailed ecological assessment to manage and mitigate potential impacts. The site is adjacent to two site of local interest (SLI) and candidate SINC sites and previous surveys have indicated that there may be ecological interest around the site itself. The site is also within the River Derwent SSSI risk assessment zone and will need to be assessed through the Habitat Regulation Assessment process required to accompany the Plan.</p> <p>The proposal would result in material impacts on the highway network particularly on Elvington Lane and the Elvington Lane/A1079 and A1079/A64 Grimston Bar junctions. A detailed Transport Assessment and Travel Plan would be required.</p> <p>Officers suggest that consideration could be given to increasing the allocation to 15 ha in total to provide approximately 10ha net of employment land equating to 33,000 sqm of floorspace over the plan period. The ratio of land to floorspace has reduced from the PSC position to reflect further evidence submitted on out of centre employment plot ratios across the city. These are approximately 3,300 sqm of floorspace per ha.</p>
ST27 (Site 852)	University of York Expansion	<p>Total Representations: 27 Supports: 5 Objections: 12 Comments: 12</p> <p>Supports comment that vehicular access from the A64 would be essential to protect</p>

Allocation Reference	Site Name	Officer Commentary
ST27 cont.. (Site 852)		<p>sustainable transport priority access into Heslington East northern access points. Managing cumulative impact of traffic generation will need significant investment in sustainable transport solutions (light rail/tram link) to join site to city centre, university campuses and ST15.</p> <p>Generally, where members of the public supported the allocation, it was suggested that certain criteria are met – such as no direct access from Heslington, uses should only be for University use rather than general employment, public rights of way are protected, and the historic views of the City are not compromised, it reflects evidence that well connected locations close to knowledge base are a significant driver for investment in the science / technology sectors.</p> <p>Heslington Village Trust comment that provided the planning principles set out in PSC document are adhered to it should be possible to develop the site without compromising the setting of Heslington and historic views of York.</p> <p>Land is good agricultural land and classified as green belt. The proposal would compromise setting of the village and views. Village will be used as main thoroughfare between new development and Heslington West (Heslington PC).</p> <p>Where members of the public objected, the comments were generally based on loss of Green Belt, loss of open space, adverse effect on historic character and setting / visual impact, over development in this location, access / traffic concerns, parking pressures, and that the University should be providing more on-site student accommodation. Also concerns that Heslington should be protected from becoming a direct route between the two campuses, land at the western campus should be developed before the eastern side and any associated housing should be subject to an Article 4 Direction.</p> <p>Other objections stated that the site highly visible from A64 and would intrude into open land, development would be contrary to green belt purposes, new junction off A64 would have landscape impacts, even with new A64 junction, development would have serious traffic</p>

Allocation Reference	Site Name	Officer Commentary
ST27 cont.. (Site 852)		<p>consequences.</p> <p>York Ornithological Trust comments that this is a potential SINC site, but the PSC document does not mention the wildlife value of the southern part of this site. As a result there is no discussion of mitigation measures and without these it is likely there would be a significant negative impact on the wildlife value of the site.</p> <p>Historic England considers that the proposal could harm two elements which contribute to special character of the historic city. Prominent views of site from A64 very close to ring road and expansion would change relationship between York and countryside to south. The proposed landscape buffer could be damaging if it adds 'alien' features to flat landscape. Site could damage relationship between York and its villages, reducing the gap.</p> <p>The University supports the principle of allocation, providing expansion space guaranteeing the University's future contribution to the need for education and research, and to the local, regional and national economies. Comment references the Publication draft Local Plan 2014, which states 'without the campus extension, the University will not be able to continue to grow beyond 2023'. The University appreciates the benefits of exploiting synergies with the proposed new settlement (ST15) to the west of Elvington Lane, in terms of servicing including transport, energy and waste. Of major benefit would be a direct access to A64 from the campus extension, if this is provided by the promoters of ST15.</p> <p>The University object to the proposed ST27 boundary in the PSC 2016 consultation. They state that the development potential of the proposed allocation is significantly reduced by the need to incorporate a substantial landscape buffer to A64 and the exclusion of land east of Green Lane, which is outside the control of the University. The remainder of the allocation would be only 21.5ha.s, providing for less than 50% of the University's expansion needs within the plan period to 2032, and could not cater for compliance with Council policy on the provision of student housing and knowledge based business facilities. See supporting 'Assessment of Visual effects' for further appraisal. Note that to not provide for the University's future development needs would impact on the City's ability to confirm a</p>

Allocation Reference	Site Name	Officer Commentary
ST27 cont.. (Site 852)		<p>permanent green belt for the first time.</p> <p>The site was reduced in PSC from 25ha at Publication Draft to 21.5ha to remove field to west to help to protect the setting of Heslington</p> <p>Representation received on behalf of University of York states that the needs analysis undertaken concludes 32.5ha gross site area is required to meet needs of University to 2032. In addition 3 boundary alternatives were included in the submission.</p> <p>Option1 is the preferred option which is the previous Publication Draft boundary. This would give a net development area of 22.5ha with a substantial landscaping buffer to the south. The western boundary of the site would also require suitable boundary treatment which would be provided within the allocation. This allocation would meet the identified need to 2032. This would also deliver the planning principles for the site, which would ensure no vehicle access to Heslington, a low density development to reflect campus 3, access to the southern side of lake (potentially shared with new junction of A64 for the ST15 site), 3 x 650 bed colleges, economic activity linked to University and an academic research facility.</p> <p>Alternative options showing development further south could work given the infrastructure required for the potential new A64 junction for ST15 which would introduce built development. Campus 3 has already changed to a degree the nature of the landscape and has 'urban influences' particularly at night when lit. There is the opportunity for an innovative masterplan that works with the landscape setting and creates a new part of city.</p> <p>Historic England continues to object to the allocation. They recognise the importance of the university to the city but consider that expansion needs to be delivered in a manner which best safeguards the elements which contribute to the setting of the city.</p> <p>The University of York is a key component of the long term success of the city and it is important to provide a long term opportunity for the University to expand. It offers a unique opportunity to attract businesses to the city that draw on the Universities applied research and there is lots of evidence across the country showing the benefits of co-locating such</p>

Allocation Reference	Site Name	Officer Commentary
ST27 cont.. (Site 852)		<p>businesses with a University. The University proposal is a priority in the Local Economic Plan (LEP) and within the Council's Economic Strategy which recognises the need to drive the University and research led growth in high value sectors. The site will also facilitate the re-configuration of the existing Campus 3 site to provide additional on-campus student accommodation helping to reduce the impacts on the private rented sector.</p> <p>Officers suggest that consideration is given to increasing the allocation to 26 ha in total to provide approximately 26,000 sqm of employment floorspace based on an approximate 10% employment use along with the provision of 3 x 650 bed student colleges and an academic research facility to meet the needs of the University over the plan period.</p>
Site 864	Land to the north of Elvington Industrial Estate	<p>New site submitted through PSC</p> <p>New site submitted through PSC for consideration as an additional employment site to the north of the existing Elvington Industrial Estate. Site is 5.4ha and is currently in agricultural use (Grade 3). The site can be accessed from the north of the existing industrial estate. The existing industrial estate benefits from a very high level of occupancy which demonstrates that this location is sound commercially and evidence from local estate agents suggests there is an unmet demand for additional employment floorspace in this area.</p> <p>The site passes the site selection methodology and technical officers consider that there are no showstoppers to the potential development of this site.</p> <p>The site could provide additional employment land to help to increase flexibility over the Local Plan period in an attractive location for employment uses. The site boundaries are clearly defined by mature hedgerows and the site is well screened.</p> <p>Officers suggest that consideration is given to this potential new allocation of 5.4ha to provide approximately 17,820 sqm of floorspace for B2, B8 uses. The ratio of land to floorspace reflects further evidence submitted on out of centre employment plot ratios</p>



APPENDIX 3

3(f) Item 4, Local Plan Points of Clarification - Local Plan Working Group meeting, 10

July 2017



Local Plan Working Group

Date: Monday 10 July 2017

Time: 5.30 pm

Venue: The George Hudson Board Room - 1st Floor, West Offices
(F045)

Agenda Supplement:

Item 4 – City of York Local Plan Points of Clarification

Points of clarification to LPWG and Executive Reports - City of York Local Plan

Annex	LPWG Agenda Page Number	Site	Update
Annex 3	Page 166	ST15 - Land West of Elvington Lane (Site 924)	<p>The map on agenda page 166 relates to the representation submitted through Preferred Sites Consultation (PSC) from the landowners/developers.</p> <p>For clarity the map should be replaced with the map attached showing the boundary which relates to the text on page 149 of Annex 3. This states that officers suggest that an increase in the site size to 216ha could be considered by Members in response to the technical evidence considered. Officers do not consider that land to the north of Minster Way should be included within the site boundary.</p>
Annex 3	Page 170	H2B - Land at Cherry Lane (Site 132)	<p>The map on agenda page 170 relates to the representation submitted through Preferred Sites Consultation (PSC) from the landowners/developers.</p> <p>For clarity the map should be replaced with the map attached showing the boundary which relates to the text on page 152 of Annex 3. This states that officers suggest that the site could be included but with a reduced boundary to that submitted by the developer/landowner.</p>
Annex 3	Page 162	Site 879 – Land at Maythorpe, Rufforth	<p>Delete text in last sentence which refers to the site being supported as a potential housing site in the emerging Rufforth Neighbourhood Plan.</p> <p>For clarity the site was assessed in the Rufforth Neighbourhood Plan as a potential housing site and passed the initial site selection criteria but was not included as an allocation due to concerns over safe access to the school.</p>
Annex 4	Page 346	Site ST27 – University of York Expansion	<p>The map on agenda page 346 relates to the boundary of the ST27 site included in the Preferred Sites Consultation (PSC).</p> <p>For clarity the map should be replaced with the map attached showing the boundary which relates to the text on page 335 of Annex 4. This states that officers</p>

Points of clarification to LPWG and Executive Reports - City of York Local Plan

			suggest that the site could be extended to the previous 2014 Publication Draft boundary.
Annex 5	Insert new page	Site FC1 – North of Mill Lane/West of A1237, Askham Bryan	<p>Annex 7 agenda page 650 and 651 proposes that the previous allocation FC1 for alternative fuel/Compressed Natural Gas (CNG) should be deleted from the Plan due to lack of confirmation of viability and deliverability. A criteria based policy is proposed which supports the development of such a facility subject to the criteria being met.</p> <p>For clarity a map should be included within Annex 5 (Officers Assessment of Other Sites following PSC) of site FC1 and its proposed deletion.</p>

APPENDIX 3

3(g) Preferred Sites Consultation Statement, September 2017

YORK

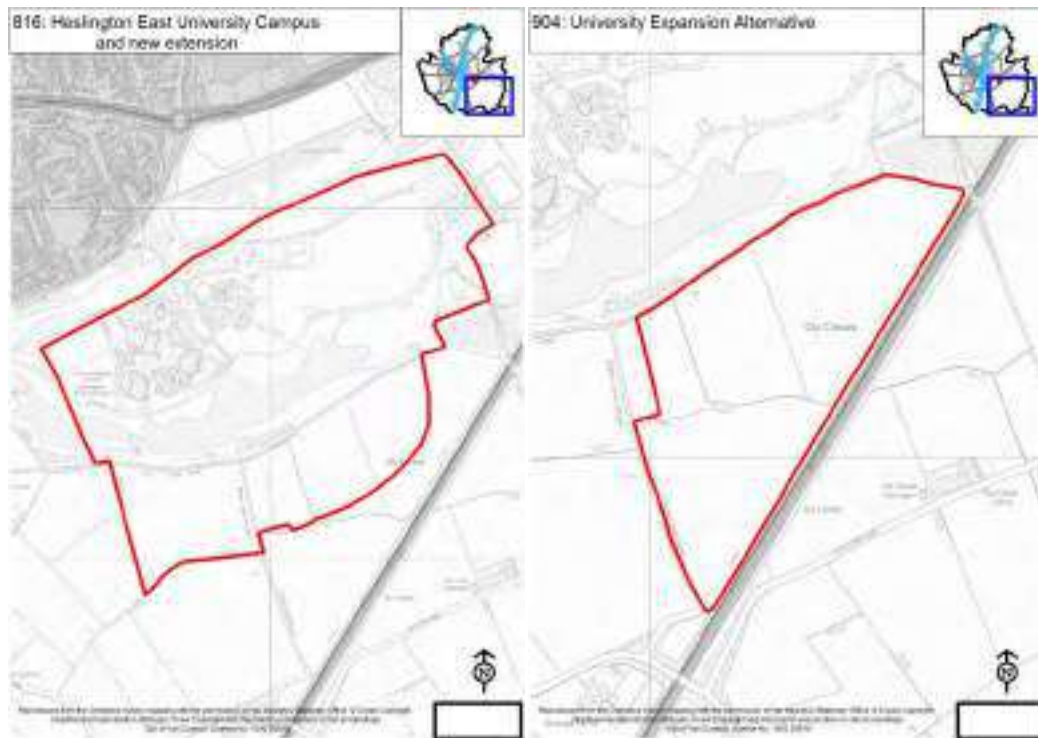
CITY OF YORK
LOCAL PLAN
Preferred Sites Consultation Statement
September 2017

ST27: University of York			
Total representations: 27	Support: 5	Objections: 12	Comments: 12
Key Issues Raised			
Support	<ul style="list-style-type: none"> Note that vehicular access from the A64 would be essential to protect sustainable transport priority access into Heslington East northern access points. Managing cumulative impact of traffic generation will need significant investment in sustainable transport solutions (light rail/tram link) to join site to city centre, university campuses and ST15 (York Green Party). Supports principle of allocation, providing expansion space guaranteeing the University's future contribution to the need for education and research, and to the local, regional and national economies. Comment references the Publication draft Local Plan 2014, which states 'without the campus extension, the University will not be able to continue to grow beyond 2023'. The University appreciates the benefits of exploiting synergies with the proposed new settlement ST34, in terms of servicing including transport, energy and waste. Of major benefit would be a direct access to A64 from the campus extension, if this is provided by the promoters of ST34 (O'Neill Associated on behalf of University of York); Generally, where members of the public supported the allocation, it was suggested that certain criteria are met – such as no direct access from Heslington, uses should only be for University use rather than general employment, public rights of way are protected, and the historic views of the City are not compromised, it reflects evidence that well connected locations close to knowledge base are a significant driver for investment in the science / technology sectors. 		
Objection	<ul style="list-style-type: none"> Land is good agricultural land and classified as green belt. The proposal would compromise setting of the village and views. Village will be used as main thoroughfare between new development and Heslington West (Heslington PC). Site highly visible from A64 and would intrude into open land, development would be contrary to green belt purposes, new junction off A64 would have landscape impacts, even with new A64 junction, development would have serious traffic consequences (Fulford PC); The development potential of the proposed allocation is significantly reduced by the need to incorporate a substantial landscape buffer to A64 and the exclusion of land east of Green Lane, which is outside the control of the University. The remainder of the allocation would be only 21.5has, providing for less than 50% of the University's expansion needs within the plan period to 2032, and could not cater for compliance with Council policy on the provision of student housing and knowledge based business facilities. See supporting 'Assessment of Visual effects' for further 		

	<p>appraisal. Note that to not provide for the University's future development needs would impact on the City's ability to confirm a permanent green belt for the first time. (O'Neill Associates on behalf of University of York);</p> <ul style="list-style-type: none"> • YOC oppose the development of this site. This is a potential SINC site, but the PSC document does not mention the wildlife value of the southern part of this site. As a result there is no discussion of mitigation measures and without these it is likely there would be a significant negative impact on the wildlife value of the site (York Ornithological Club). • Proposal could harm two elements which contribute to special character of the historic city. Prominent views of site from A64 very close to ring road and expansion would change relationship between York and countryside to south. Landscape buffer could be damaging if it adds 'alien' features to flat landscape. Site could damage relationship between York and its villages, reducing the gap. Could result in serious harm to SA objective 14 (Historic England). • Where members of the public objected, the comments were generally based on loss of Green Belt, loss of open space, adverse effect on historic character and setting / visual impact, over development in this location, access / traffic concerns, parking pressures, and that the University should be providing more on-site student accommodation, Heslington should be protected from becoming a direct route between the two campuses, no additional infrastructure or roads in the green belt, needs buffers, over development of Heslington, land at the western campus should be developed before the eastern side, any associated housing should be subject to an Article 4 Direction, more work places will create more demand for housing,
Comment	<ul style="list-style-type: none"> • Provided the planning principles set out in PSC document are adhered to, should be possible to develop site without compromising setting of Heslington and historic views of York (Heslington Village Trust); • ERYC queried whether the scale and type of development proposed on ST15 and ST27 (within the plan period) would be able to support the construction of a new junction on the A64 (East Riding of Yorkshire Council). • The site should be designed so that new lakes, scrub and grass land do not lose their value for wildlife and that ecological impacts and the needs assessment should be included in the notes for ST27 (Yorkshire Wildlife Trust). • Where members of the public commented, the comments were generally based on the recognition of the need for a thriving

university, but need for screening, consideration of access / parking issues, protection of wildlife / ecology, visual protection, the retention of public rights of way, loss of agricultural land & loss of views to the Wolds, needs direct route on to A64, increased traffic on B1228 will destroy bridleways, paths etc, essential that traffic should not access site from Low Lane .

ST27: Alternative boundary proposed



University of York (O'Neill Associates)

Objection to ST27 boundary. See alternative boundaries proposed as per the below. The development potential of the proposed allocation is significantly reduced by the need to incorporate a substantial landscape buffer to A64 and the exclusion of land east of Green Lane, which is outside the control of the University. The remainder of the allocation would be only 21.5ha.s, providing for less than 50% of the University's expansion needs within the plan period to 2032, and could not cater for compliance with Council policy on the provision of student housing and knowledge based business facilities. See supporting 'Assessment of Visual effects' for further appraisal. Note that to not provide for the University's future development needs would impact on the City's ability to confirm a permanent green belt for the first time.

Suggested amended site boundary 1 - as per 2014 Draft Local Plan 'Publication' allocation (site 816). For the University, this is the option that can best meet its development land requirements over the plan period, fundamental in terms of the local plan being able to confirm permanent Green Belt boundaries for the city for the first time. This boundary provides the best prospect of incorporating the expansion site with the existing campus and, due to the wide landscape buffer to the south of the allocation, would have less impact on the historic setting. It does not intrude into

important open areas, such as Strays or river corridors. It has the greatest prospect of aiding the City in meeting its educational and student housing aspirations, while meeting visual mitigating requirements, transport provision and other stated principles. The University appreciates the benefits of exploiting synergies with the proposed new settlement ST34, in terms of servicing including transport, energy and waste. Of major benefit would be a direct access to A64 from the campus extension, if this is provided by the promoters of ST15. See supporting 'Assessment of Visual effects' for further appraisal.

Suggested amended site boundary 2 - as per ST27, and including land to the south (see map, as per site 904). This option would provide significantly more potential than ST27 alone (around 21ha developable area, plus further 9ha open space/buffer). It does not intrude into open areas, such as Strays or river corridors. The University appreciates the benefits of exploiting synergies with the proposed new settlement ST34, in terms of servicing including transport, energy and waste. Of major benefit would be a direct access to A64 from the campus extension, if this is provided by the promoters of ST15. See supporting 'Assessment of Visual effects' for further appraisal.

General issues raised in relation to Area 2

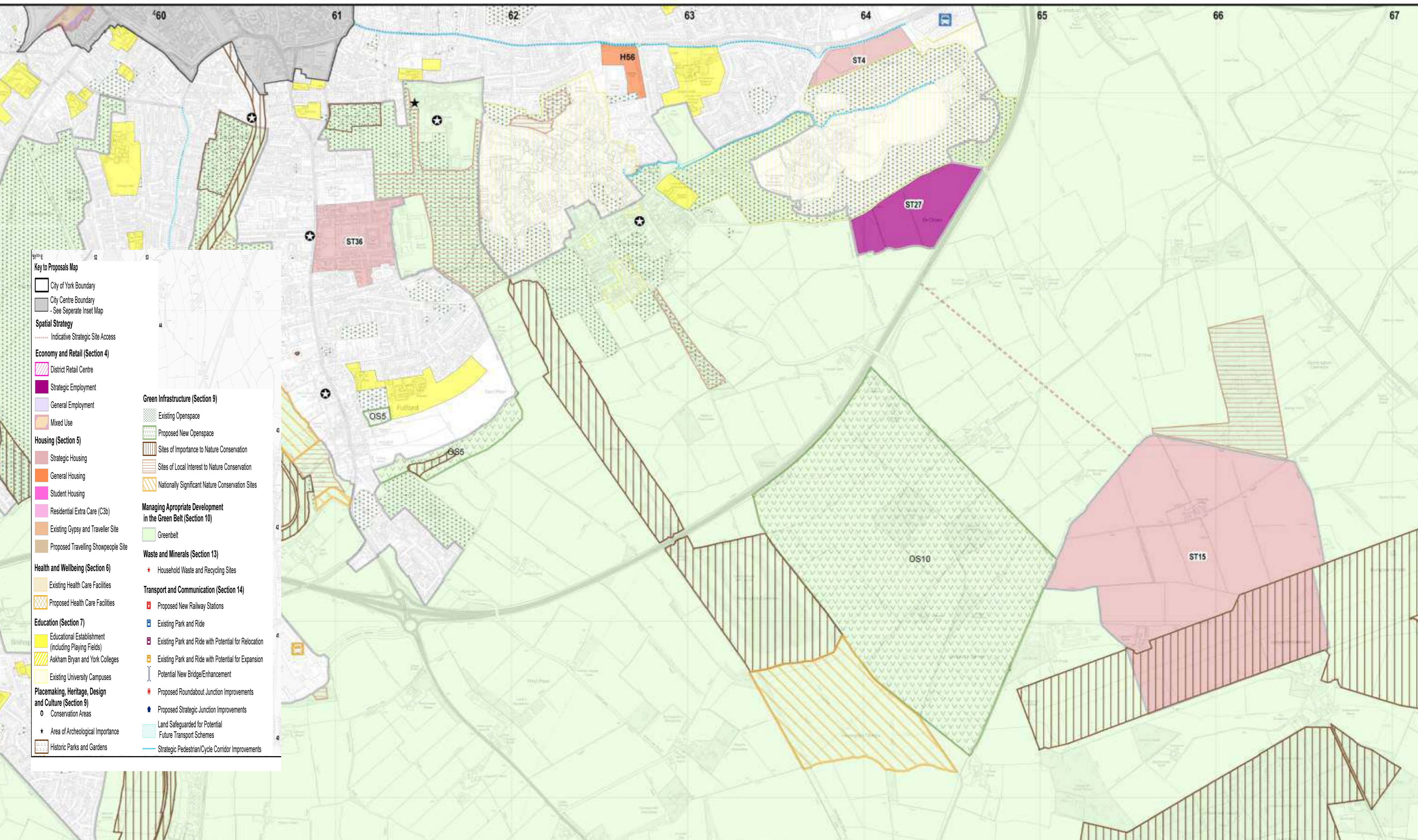
Total representations: 6 Support: n/a Objections: 5 Comments: 1

Key Issues Raised

Support	N/A
Objection	<ul style="list-style-type: none"> Objection to the development in the Elvington area on the following grounds: proposed housing levels are too high and likely to exacerbate existing traffic congestion; likely adverse impact on wildlife; development will erode the character and identity of Elvington Village.
Comment	<ul style="list-style-type: none"> Area 2: Elvington - The LP Preferred Sites has been subject to 2 local public drop in sessions to assess public opinion. The PC does not oppose new residential/employment developments - but the PC has never been asked what the village actually needs - we consider the methodology to be wrong. It is clear that the village needs a better mix of properties such as larger houses and affordable homes (Elvington PC). Other comments raised suggested that the preferred sites in this area could ruin the rural setting of Elvington (which needs protecting) and a 'new town' could be damaging to the area, especially if no infrastructure to support it. It was also suggested that the area should be left for business expansion, such as the University of York and Elvington (Research laboratories and agricultural museum). Conversely, it was also suggested that the area could support more development as it would not impact on existing residents of York and would give easy access for the A64, for employers and retailers.

APPENDIX 3

3 (h) Pre-Publication Draft Local Plan Proposals Map South (excerpt), September 2017



Key to Proposals Map

- City of York Boundary
- City Centre Boundary - See Separate Inset Map

Spatial Strategy

- Indicative Strategic Site Access

Economy and Retail (Section 4)

- District Retail Centre
- Strategic Employment
- General Employment
- Mixed Use

Housing (Section 5)

- Strategic Housing
- General Housing
- Student Housing
- Residential Extra Care (C3b)
- Existing Gypsy and Traveller Site
- Proposed Travelling Showpeople Site

Health and Wellbeing (Section 6)

- Existing Health Care Facilities
- Proposed Health Care Facilities

Education (Section 7)

- Educational Establishment (including Playing Fields)
- Askham Bryan and York Colleges
- Existing University Campuses

Placemaking, Heritage, Design and Culture (Section 9)

- Conservation Areas
- Area of Archeological Importance
- Historic Parks and Gardens

Green Infrastructure (Section 9)

- Existing Openspace
- Proposed New Openspace
- Sites of Importance to Nature Conservation
- Sites of Local Interest to Nature Conservation
- Nationally Significant Nature Conservation Sites

Managing Appropriate Development in the Green Belt (Section 10)

- Greenbelt

Waste and Minerals (Section 13)

- Household Waste and Recycling Sites

Transport and Communication (Section 14)

- Proposed New Railway Stations
- Existing Park and Ride
- Existing Park and Ride with Potential for Relocation
- Existing Park and Ride with Potential for Expansion
- Potential New Bridge/Enhancement
- Proposed Roundabout Junction Improvements
- Proposed Strategic Junction Improvements
- Land Safeguarded for Potential Future Transport Schemes
- Strategic Pedestrian/Cycle Corridor Improvements

APPENDIX 3

- 3(i) Annex A, Pre-Publication Draft Local Plan Consultation Responses – as presented
to Local Plan Working Group meeting, 23 January 2018

Annex A

Pre Publication draft Local Plan Consultation Responses

Introduction

1. A city-wide consultation on the Local Plan Pre Publication Draft (Reg 18) commenced on the 18th September 2017 and finished on 30th October 2017. It was carried out in compliance with the Council's adopted Statement of Community Involvement (2007). The consultation included contacting individuals and organisations on the Local Plan database, public exhibitions, meetings, a special edition of 'Our City', and information provided via conventional and social media.
2. During the consultation period we have received responses from circa 1,295 individuals, organisation or interest groups. Given that those responding tend to raise multiple points this equates to around 4,000 representations.
3. Annex A provides a summary of the representations along with potential changes for Members' consideration. Subject to Members agreement, changes will be incorporated into a Publication draft Local Plan to go out to citywide consultation (Regulation 19) in due course.
4. The Annex contains a proforma for each policy in the emerging Local Plan which includes:
 - Potential Changes to policy post Pre-Publication Consultation with changes shown as 'tracked changes';
 - Supporting text changes.
 - Summary of reasons for change.
 - Consultation responses summarised as supports, objections and comments.
5. These proformas are in plan-order as set out in the index (overleaf). The proformas are presented in two sections; policies and general site allocations. This includes suggested changes to the sites and alternative site allocations. All strategic sites (ST) are represented in the SS site policies section.
6. A table of sites submitted that were previously rejected or new sites considered are also summarised. Appendix 1 to this annex sets out analysis of any re-submitted previous rejected sites and any new sites that have been submitted as part of the consultation which have been identified as having potential for allocation.

Potential Changes to Policy Post Pre- Publication consultation (2017)

Policy SS22: University of York Expansion

University of York Expansion (ST27) will provide ~~21,500sqm of~~ B1b employment floorspace for knowledge based businesses including research-led science park uses and other higher education and related uses (see Policy ED3: Campus East). A development brief will be prepared for ST27, covering site considerations, including landscaping, design, local amenity, accessibility and transport requirements. In addition to complying with the policies within this Local Plan, the site must be delivered in accordance with the following key principles.

- i. Create an appropriately landscaped buffer between the site and the A64 in order to mitigate heritage impacts and to maintain key views to the site from the south and its setting from the A64 to the south and east.
- ii. The developed footprint (buildings, car parking and access roads) shall not exceed 23% of the total site area.
- iii. Enhance and continue the parkland setting of the existing university campus, with new buildings being of a high design standard.
- iv. Provide additional student accommodation, which is clearly evidenced in terms of demand.
- v. Deliver high quality, frequent and accessible public transport services to York City Centre. It is envisaged such measures will enable upwards of 15% of trips to be undertaken using public transport.
- vi. Optimise pedestrian and cycle integration, connection and accessibility in and out of the site and connectivity to the city and surrounding area to encourage the maximum take-up of these more ‘active’ forms of transport (walking and cycling).
- vii. Demonstrate that all transport issues have been addressed, in consultation with the Council and Highways England as necessary, to ensure sustainable transport provision at the site is achievable. The impacts of the site individually and cumulatively with site ST15 should be addressed.
- viii. Explore providing access through an enhanced road junction on the A64 to the south of the site. There may also be an opportunity for a further restricted/limited southern access to the University off the A64 in conjunction with ST15 (Land West of Elvington Road). Access to the A64 would require approval of Highways England.
- ix. Exploit synergies with ST15 (Land West of Elvington Road) with regard to site servicing including transport, energy and waste.

Supporting Text Changes:



N/a

Summary of Reasons for Change

Minor amendment to reflect changes made to site capacity in policy EC1.

ST27: University of York expansion

	Pre Publication Draft Local Plan	Potential Change
Site Size	21.5 ha	26 ha

Estimated Yield	21,500 sqm of B1b employment floorspace	B1b employment floorspace for knowledge based businesses including research-led science park uses and related uses including up to 25 ha on this site and the existing Heslington East Campus.		
Phasing	N/A	N/A		
Potential Allocation Boundary		Pre-Publication Boundary		
				
Summary of Reasons for Change				
Based upon the consultation comments and technical evidence submitted, officers propose including a revised boundary (site 954) increasing the allocation to 26 ha in total to provide approximately 26,000 sqm of employment floorspace based on an approximate 10% employment use along with the provision of 3 x 650 bed student colleges and an academic research facility to meet the needs of the University over the plan period.				
Consultation Responses				
Total no. of respondents: 20	Supports: 4	Objections: 11	Comments: 9	
Support	<ul style="list-style-type: none"> Highways England support, transport issues are covered satisfactorily in key principle (vii). HE welcomes the statement in Para. 7.11 that Site ST27 will be accessed via Hull Road via Campus East. HE's agreement in principle to the provision of a new junction on the A64 to serve site ST15 Land West of Elvington Lane is conditional on there being no access from the A64 northwards towards Campus East. 			

	<ul style="list-style-type: none"> • University of York support the principle of allocation for expansion primarily for residential colleges, academic buildings, knowledge based businesses and car parking/infrastructure. Support for employment allocation to meet knowledge-led businesses demand. Support for the site to have restrictions in relation to obligations on the university to encourage student living on campus. • Two members of the public expressed support for the allocation, one welcomed development allocation being moved away from the village but still stressed the importance of protecting Heslington from traffic and student thoroughfare.
Objection	<ul style="list-style-type: none"> • Historic England object as development so close to the A64 will change the relationship the southern edge of York has with surrounding countryside; it will also alter the perception of the setting of York and the relationship to surrounding villages. • Fulford Parish Council object, noting that the costs of expansion (HMOs, parking, congestion etc.) fall disproportionately on local communities in Heslington, Badger Hill and Fulford. The four policies proposed to deal with the university SS22, ED1, ED2 & ED3 should be rationalised as they duplicate each other and set out similar objectives in slightly different ways. Development would bring large-scale development almost completely up to the A64, replicating the type of harm already seen at Clifton Moor. This would conflict with at least three of the purposes of the Green Belt as set out in NPPF paragraph 80. The site of Proposal ST27 was not intended to be developed by the University when it sought planning permission for Heslington East; instead the site was shown as part of the green buffer around the site. The proposed allocation is for “B1b knowledge businesses” rather than to meet any need identified for further university uses which cannot be accommodated on the existing two campuses, no substantial case has been made which demonstrates a need for further land for knowledge-based businesses beyond that allowed by the 2006 Secretary of State permission. Even if there is such a need, FPC considers that sites would not have to be immediately adjacent to the University. If ST27 is retained, the following alterations should be made: 1) Criterion iv) should be altered to omit “which is clearly evidence in terms of demand” as it is ambiguous in meaning. 2) Criterion v) should be strengthened. High quality sustainable transport is vital to reduce congestion on the local road network and impacts on nearby communities. To ensure this, FPC considers the criterion should be reworded as follows: Deliver high quality frequent and accessible public transport to York City Centre and elsewhere including Campus West. Any proposal must demonstrate that such measures will enable upwards of 15% of trips to be undertaken using public transport. Monitoring and delivery arrangements will be required in a Section 106 Undertaking to ensure that this policy objective is secured in practice. 3) Criterion vii) should be revised so that it applies the

stronger NPPF paragraph 32 test as follows: Demonstrate that all transport issues have been resolved, in consultation with the Council and Highways England as necessary, so that the residual cumulative impacts on the surrounding highway network are not severe. The cumulative impact of the proposal with other proposals to the south-east of York, including ST4 and ST15, should be addressed. 4) Criterion viii) should be either deleted or strengthened. FPC is opposed in principle to a new access onto the A64 because of its harmful impacts on the environment (see below). However if it is to be provided, it is important that ST27 (and the rest of Campus East) makes use of it to benefit local roads. 5) A new criterion should be added so that only businesses linked to the university should be allowed on the site. Otherwise there is a danger that the site is rapidly developed for businesses not genuinely requiring a location adjacent to the university and a case is made in the future for the release of another similar site. FPC suggests the following: Demonstrate that only knowledge-based businesses genuinely requiring a location on or immediately adjacent to the University campus are allowed to occupy premises on the site.

- Heslington Parish Council object, development will lead to loss of agricultural land and will disrupt the setting of the campus lake and Heslington village. If this allocation were to be approved then its use and access must be conditioned so that: There should be no direct vehicular or pedestrian access from the site, when developed, into the village other than via Field Lane. If access from a new road from ST15 connects with ST27 Campus East then no “rat run” opportunity should be available that allows traffic through to Heslington village. The Local Plan should stipulate that the land can only be developed for the university’s own academic purposes, and not be designated as general development land. All existing public routes and Rights of Way should be retained in any completed development.
- University of York’s main objection relates to the policies which strongly support the University’s continued expansion but are not translated into adequate land allocation for expansion. The 14ha of development space proposed for the next 20 years will not provide the security which the university needs for long term planning and therefore will not meet the Council’s own policies on growth of the University and expansion of the York economy. Taking into consideration space planning it is considered that 23.8 ha of developable land are required to 2032/22 and 28 ha to 2038 to allow for green belt permanence (2014 boundary with landscape buffer). Current allocation therefore hinders ability to respond to future requirements and need. The policy should reference knowledge based business in addition to other higher education and related uses. Object to the boundary proposed in 2017 (Option 2 referred to in response) as they consider that this would require an internal buffer to the A64 (5.5ha) and therefore only allow a 14 ha of developable land. This is likely to

	<p>put pressure on the Green Belt boundaries in the long-term by inadequately allocating land for the University in the long-term; this would meet 50% of development needs. The three alternative boundaries suggested show that there is little difference between the sites in terms of visual effects. Principally the campus will be seen from the south east although the 64 corridor acts as a visual barrier. Accepted that there will be significant change in landscape character at Heslington East from open agricultural land to areas of large scale built development. Considered that this would have a weaker relationship to campus given only part developed on the south eastern part of the lake. Western edge includes 2ha of land outside of university control. Would mean smaller scale development with only one area of open space - limited parkland setting. Detailed landscape principles are recommended.</p> <ul style="list-style-type: none"> • University of York object to the disparity between the existing planning permission on campus east for up to 25ha of employment floorspace (likely to be 5.75ha / 57,500 sqm single storey) to 21,500 sqm (equating to 2.33 0 3.16 ha) in policy SS22 and ED3. The policy needs to be altered to clarify that the existing permitted 25 ha of business at 23% footprint on campus East stands plus 21,5000 sqm at the extension. Wording suggested that with agreement of the Council, the University can restrict the B1b provision on Campus East, in order to make equivalent provision on the extension, to a total of 25 ha across both sites. This could facilitate a cluster of knowledge- led businesses taking advantage of A64 location. The contradiction between ED3 and EC1 needs to be clarified to allow the campus extension. • Several members of the public objected, mainly due to the development on green space obstructing or ruining views, disrupting the setting of York and concerns about traffic through Heslington.
Comment	<ul style="list-style-type: none"> • Highways England stress that it will be essential for an assessment to be made of the traffic impact of the site both individually and cumulatively with site ST15 in a Transport Assessment. • Northern Power Grid stress there may be need for network reinforcement for connections to the site but there is not enough detail provided at this stage in the planning process. Recommends developers submit an application for connection to Northern Power Grid as soon as they have detail of site location and electrical capacity requirements so a quote for the connection can be provided along with details of any reinforcement and/or diversion works that may be required. • University of York mention the importance of the University to York's economy and detail recent expansion and plans for the future. Changes to government funding have resulted in the university planning more specifically for the future. Key to size are growing departments, growth in international foundation

	<p>programmes for internal students and growing long distance learning. Projected need for the future for student accommodation includes 2 colleges in the short-term and 3 more in the long-term to 2032; extra 3 colleges cannot be accommodated on existing campus. Employment use buildings such as The Catalyst need car parking within close proximity. Access from the A64 in conjunction with ST15 may be attractive for business users. Principally the campus will be seen from the south east although the 64 corridor acts as a visual barrier. Accepted that there will be significant change in landscape character at Heslington East from open agricultural land to areas of large scale built development as per the Campus East. Confident that car parking across Campus East and the new extension will be accommodated within the existing planning permission as only 27% of maximum of current permission provided. Supportive of connectivity to the A64 alongside ST15. No vehicle access proposed through Heslington.</p> <ul style="list-style-type: none"> • Heslington Village Trust movement of the site away from the village is welcome but as with ST15 the village must be protected from both vehicular traffic and students coming through the village. Any new access from ST15 must run closely adjacent to the A64 to minimise harmful impacts on open farmland and views to / from Heslington. • York Ramblers note that at the eastern edge of the site there is an outer urban footpath link from Hopgrove to Esrick. They would appreciate maintaining a green way alongside the site rather than a path along boundary buildings, same applies to Green Lane which leads down to Grange Farm. There should certainly be a green buffer and trees to screen the development somewhat from the A64, agree that the 23% footprint should include car parking and access roads. • Three comments from members of the public are all concerned with access to the site, one supporting direct access to the A64, another asking how traffic through Heslington will be restricted and the final one asking how the site will be accessed from Hull Road.
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Boundary change Submitted

University of York propose three alternate site boundaries:

- Option 1 - 2014 version of 28ha with an external buffer of around 30ha. This would provide 26ha of developable land and negates need for landscape buffer in allocation. Preferred option thought to be most successful to meet the University's needs in the long-term. 2ha remains outside of university control. Likely to have a strong landscape scheme with high quality open parkland setting with wide southern buffer area. Principally the campus will be seen from the south east although the 64 corridor acts as a visual barrier. Accepted that there will be significant change in landscape character at Heslington East from open agricultural land to areas of large scale built development. No impacts on views to Heslington although some panoramic views. Also likely to have strong green belt boundaries along historic field pattern. Detailed landscape principles are recommended. Parkland setting

key to mitigating landscape changes similarly to Campus East. Site would cater for 3 x residential colleges and research-led business activity linked to the university.



- Option 2 – version in the current plan that above response is referring to.



- Option 3 - 32 ha extending the 2017 allocation further south including a landscape buffer of 7.5ha. This would incorporate a 7.5 ha buffer leaving 22.5 ha of developable land. 2ha remains outside of university control. Principally the campus will be seen from the south east although the 64 corridor acts as a visual barrier. Accepted that there will be significant change in landscape character at Heslington East from open agricultural land to areas of large scale built development. Relationship to campus is similar to the current boundary although larger scale development and open parkland setting likely to be accommodated. A major inhibitor would result from the proximity to the A64 and visibility; a considerable buffer/ noise barrier to the A64 would be required providing glimpsed views to campus. The views to Heslington would not be interrupted. Detailed landscape principles are recommended. Parkland setting key to mitigating landscape changes. Site would cater for 3 x residential colleges and research-led business activity linked to the university.



APPENDIX 3

- 3(j) Report of the Assistant Director of Planning and Public Protection (excerpt) – as presented to Local Plan Working Group meeting, 23 January 2018

Local Plan Working Group

23rd January 2018

Report of the Assistant Director of Planning and Public Protection
(The Local Plan is the portfolio of the Leader and Deputy Leader)

City of York Local Plan

Summary

1. This purpose of the report is:
 - (i) To provide a background summary of the previous iterations of draft policies and the circumstances which led to the rationale of the Executive decision to approve the Pre-Publication Draft Local Plan for consultation;
 - (ii) To provide a summary of the present national policy and legislative context, including the “soundness” requirement and potential for Government intervention;
 - (iii) To report responses to the Autumn 2017 Pre Publication Draft Local Plan Consultation;
 - (iv) To provide Officers’ advice regarding appropriate responses to the Consultation outcomes; and
 - (v) To seek Member approval of the next steps in the York Local Plan making process.

Recommendations

2. The LPWG request Members of Executive to:
 - (i) Consider any potential changes to the pre publication draft Local Plan (Regulation 18) based on the information included within this report and associated annexes and confirm the basis on which the

33. Table 4 includes new sites that have emerged during the Autumn 2017 Consultation. Although they do meet the requirements of the site selection methodology and therefore potentially represent reasonable alternative, they have not been included in any previous consultation. If any of these sites were to be included in the next stage of the Local Plan the lack of consultation creates a risk to process and the Examiner could require further consultation before the Examination could proceed. Carrying out further consultation now about proposing to include these new sites would mean that the May 2018 date for submission could not be met.

Employment Land Supply

34. The Employment Land Review (ELR) July 2016 published as part of the Preferred Sites Consultation used projections by Oxford Economics (OE) dated May 2015 as the forecast for employment land demand over the Local Plan period. These forecasts provided the starting point for determining the amount and type of employment land required to be identified in the Plan. The projections by Oxford Economics presented a baseline scenario for York forecasting a job growth of 10,500 jobs over the period 2014-2031. Two further scenarios were considered by OE; scenario 1 – higher migration and faster UK recovery, which identified an additional 4,900 jobs above the baseline over the same period and scenario 2 – re-profiled sector growth which identified 500 additional jobs above the baseline. Scenario 2 was endorsed as it reflected the economic policy priorities of the Council to drive up the skills of the workforce and encourage growth in businesses which use higher skilled staff.
35. To sensitivity test the original 2015 OE projections, the latest Experian economic forecasts within the Regional Econometric Model (REM) were used. The conclusion was that the original forecasts were still robust. At the Executive in July 2017 Members endorsed this position.
36. During the consultation a range of points were raised. These are provided in summary below:

- general support for the Local Plan as positively and proactively encourage sustainable economic growth, including tourism and leisure;
- the approach to focusing retail development in the City Centre and reducing / limiting future development at out of town locations was also supported;
- some representations recognised the uncertainties inherent in long term economic forecasting and therefore suggested that the using the baseline forecast to inform the employment land requirements of the Plan was over cautious;
- it was also suggested that housing and employment policies are restrictive and the employment land supply will not cater for York's future needs;
- the cost of housing impinging on companies and public services abilities to recruit staff was raised;
- a perceived conflict was highlighted relating to acknowledging the universities importance for growth but failure to allocate land for expansion; and
- a few members of the public were opposed to, or questioned, economic growth as a goal in of itself saying it is incompatible with sustainability.

37. **Given comments made about economic growth Members may wish to consider increasing the employment land supply. The sites included in tables 5, 6 and 7 provided potential options.** As with housing supply above it is important that this is balanced against whether changes can be made to the plan without undertaking additional consultation, a critical issue if the Council is to meet the May 2018 deadline for submission.

Table 5: Potential changes to employment sites allocated in the Pre Publication Draft Local Plan in response to developer proposals (With minor or no boundary changes)

Allocation Reference	Site Name	No. Included in PPLP	Potential Revised Figure
ST5	York Central	60,000 sqm	100,000 sqm

Table 6: Potential changes to employment sites allocated in the Pre Publication Draft Local Plan in response to developer proposals (With boundary changes)

Allocation Reference	Site Name	No. Included in PPLP	Potential Revised Figure
ST27	University of York expansion	21.5ha	26ha
ST26	Elvington Airfield Business Park	10 ha/	15 ha / 33,000sqm

38. Table 5 and 6 relates to increasing the capacity and extending existing site allocations. **It is a matter of judgment as to whether the changes to the existing sites are “material”.** In the context of the large strategic allocations, it is considered arguable by your officers that the additional land is not a material change. However, this is a matter of judgment, and there is a residual risk that the Examiner will take a different view and require the Council to undertake further consultation on this issue following submission.

Table 7: Potential new employment site allocations, in response to developer proposals (previously rejected employment sites)

Site Reference	Site Name	Potential Revised Figure
795	Greenacres Murton Lane	1.95ha / 6,000 sqm
864	Extention to Elvington Industrial Estate	5.4ha / 17,820 sqm
940	Remaining Land at Bull Commercial Centre	3ha/ 10,000 sqm

39. Table 7 includes sites that have in the past been assessed against the site selection criteria and rejected, but now given further work Officers feel should be considered. These could potentially be included in the Publication Draft without the need for a further additional consultation, as they have already been the subject of public scrutiny through previously published Local Plan evidence or SA/ SEA. There is however a higher risk than tables 5 & 6 that the Examiner may find further consultation is needed.

APPENDIX 3

3(k) Publication Draft Local Plan Proposals Map South (excerpt), February 2018

APPENDIX 4

Local Plan Publication Draft (February 2018) – Relevant Policies:

- o Policy ED1 – University of York
- o Policy ED2 – Campus West
- o Policy ED3 – Campus East
- o Policy SS1 – Delivering Sustainable Growth for York
- o Policy SS22 – University of York Expansion
- o Policy EC1 – Provision of Employment Land
- o Policy H7 – Student Housing
- o Policy H8 – Houses in Multiple Occupation
- o Policy SS2 – The Role of York’s Green Belt

Section 7: Education

- 7.1 Building on recent years investment in the city's educational facilities, to contribute to making York a world class centre for education it is vital to provide the quality and choice of learning and training opportunities to meet the needs of children, young people, adults, families, communities and employers. The Council has a key role in supporting parents and families through promoting a good supply of strong educational facilities whether this is schools, academies or free schools which reflect the aspirations of local communities. It is also important to ensure that facilities at the city's further education establishments and two universities meet the requirements of modern education institutions.

Policy ED1: University of York

To ensure the continuing development of the University of York, the following range of higher education and related uses will be permitted on the University's campuses, as identified on the Proposals Map:

- academic, teaching, research and continuing professional development uses;
- housing for staff and students;
- arts, cultural, sports and social facilities ancillary to higher education uses;
- conferences;
- knowledge based businesses including research led science park; and
- any other uses ancillary to the university including support services for the uses identified above.

The University of York must address the need for any additional student housing which arises because of its future expansion of student numbers. Provision will be expected to be made on campus in the first instance. In assessing need, consideration will be given to the capacity of independent providers of bespoke student housing in the city and whether it is economically prudent to provide additional student accommodation.

See also Policy ED2, ED3 and H7

Explanation

- 7.2 To ensure that the existing campuses forming the University make a full contribution to the life of the city, it is important that they continue to be used for predominantly higher educational and related uses. It is also vital that opportunities are maintained for the University's cultural, social and sports facilities to be used by the wider public.
- 7.3 Campus East provides the potential for a cluster of knowledge based companies to locate, to the benefit of city and University. Such uses will contribute to the implementation of the York Economic Strategy (2016) and to the vitality of the University's research activities.

Delivery

- Key Delivery Partners: City of York Council, University of York and developers.
- Implementation: Planning applications.

Policy ED2: Campus West

To maintain the character of Campus West, proposals for extension and redevelopment of existing buildings and the construction of new buildings will be allowed within the following parameters:

- the developed footprint (buildings and car parking only) shall not exceed 23% of the total site area, unless for an agreed temporary period during the implementation of proposals;
- the heights of buildings shall be appropriate to their surroundings and not exceed the height of any adjacent mature tree canopies unless a greater height can be justified in relation to a proposed iconic or landmark building;
- the landscape is conserved and enhanced;
- general car parking (excluding accessible parking spaces) shall not exceed 1,520 spaces;
- maintenance of an adequate internal cycle and pedestrian network which links to entrance points and bus stops; and
- the level of student housing capacity is retained at no less than 3,586 bed spaces unless the spaces are re-provided on Campus East.

See also Policy ED1

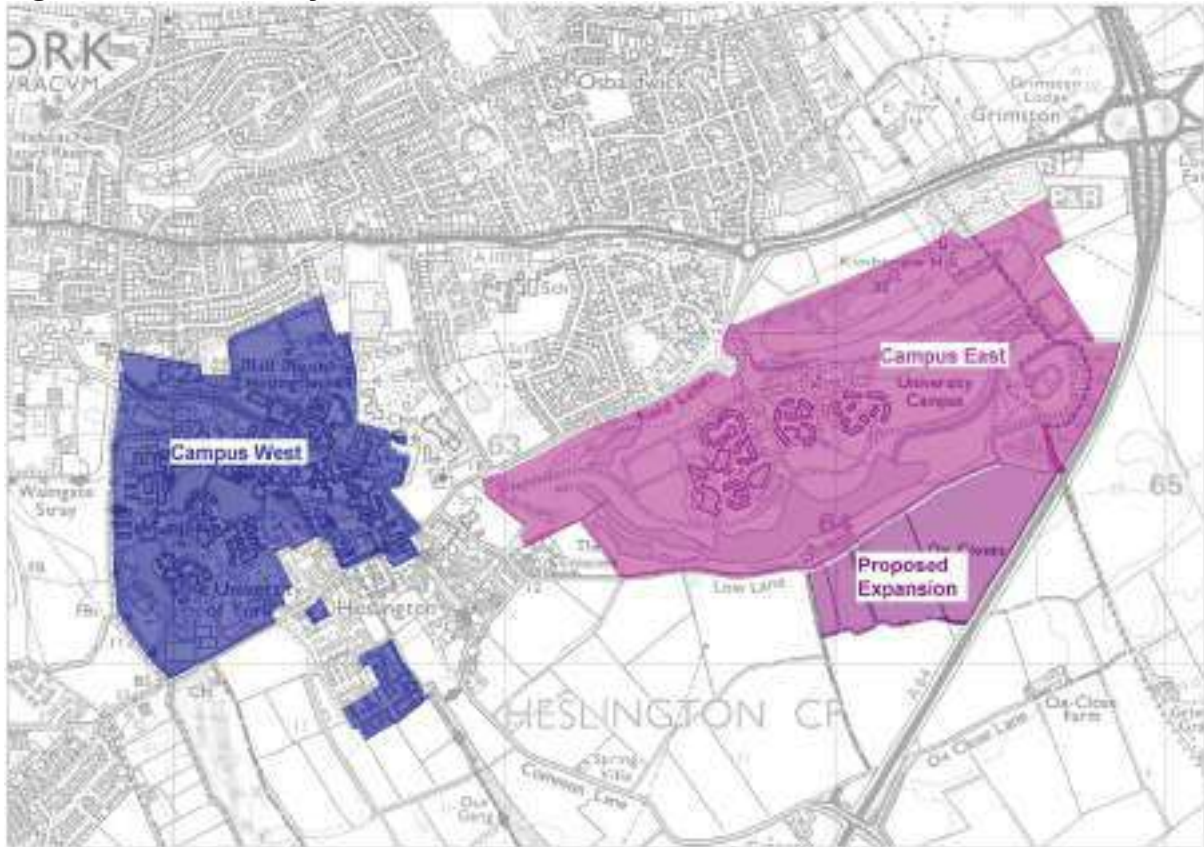
Explanation

7.4 Campus West is shown overleaf at Figure 7.1. To ensure that university buildings on Campus West meet the requirements of a modern higher education institution, the replacement of buildings that are no longer fit for purpose and life expired will be supported. Proposals for extension or redevelopment should be in accordance with the provisions of the emerging University of York Development Brief, the principles of which are set out in Policy ED2 above. For information on the uses permitted at Campus West please see Policy ED1.

7.5 In accordance with the Section 106 legal agreement for Campus East, the level of student housing capacity at Campus West must be retained at least at the level at 2006, at the date of the agreement. This was established at 3,586 bedspaces.

Delivery

- Key Delivery Partners: City of York Council, University of York and developers.
- Implementation: Planning applications.

Figure 7.1: University of York

Policy ED3: Campus East

The continuing development of University of York Campus East is supported alongside the expansion site at ST27 (University of York Expansion). Development will be permitted in accordance with the uses outlined in Policy ED1 and the following parameters:

- the developed footprint (buildings, car parking and access roads) shall not exceed 23% of the 65ha area allocated for development;
- total car parking shall not exceed 1,500 spaces subject to reserved matters approval by the Council;
- the maintenance of a parkland setting;
- additional student housing shall be provided to cater for expansion of student numbers which is clearly evidenced in terms of demand. Any additional student housing provision on Campus West (over and above the existing 3,586 bed spaces) shall be taken into account when assessing need; and
- an annual student accommodation survey shall be submitted to the Council.

As shown on the proposals map, 21.5ha of land to the south of the existing Campus East site is allocated for the future expansion of the university during the plan period (ST27: University of York Expansion). Campus East and ST27 will across both sites deliver up to 25ha of B1b knowledge based businesses including research led science park uses identified in the existing planning permission for Campus East.

ST27 must create an appropriately landscaped buffer must be created between development and the A64 in order to mitigate heritage impacts in terms of the historic character and setting of the city and to maintain key views.

A development brief will be prepared for ST27, covering site considerations, including landscaping, design, local amenity, accessibility and transport requirements.

See also Policy SS22, EC1 and ED1

Explanation

- 7.6 The University of York Campus East is shown at Figure 7.1. The planning permission as implemented (08/00005/OUT) and the Section 106 legal agreement provide the context for development at the campus and are summarised in the policy above. In accordance with the consent the creation of a parkland setting and its maintenance must be of high visual quality and good design, whilst also enhancing public amenity in terms of access to the countryside and wildlife interest. This includes preservation and where possible enhancement of the views that can be seen from the site.
- 7.7 An annual student accommodation survey must be submitted to the Council. If in any year an annual survey demonstrates that there is unmet student housing demand on the site in excess of 50 bedspaces the university must undertake to bring forward and implement plans to provide additional accommodation on site, in units of 300 bedspaces, within two years of the date of the survey, so long as it is economically prudent to do so.
- 7.8 The University of York retains a high profile in both the UK and in the rest of the world. The university's status is reflected in the high demand for student places at the university and it is currently projected that growth in student numbers will continue over the duration of the plan up to 2032. Without the campus extension, the university will not be able to continue to grow beyond 2023. As one of the leading higher education institutions, the university needs to continue to facilitate growth, within the context of its landscaped setting which gives it a special character and quality, to guarantee its future contribution to the need for higher education and research and to the local, regional and national economies. The 21.5ha of land at ST27 is allocated for university uses to support this growth. Housing for the additional increase in student numbers will be provided in accordance with Policy ED1 'University of York' and Policy H7 'Student Housing'.
- 7.9 The expansion site (ST27), shown at Figure 7.1, plays a critical part in the attractive setting of the city and Heslington village. It has a distinctive landscape quality and provides accessible countryside to walkers and cyclists on the land and public footpaths. The land to the west is particularly important for maintaining the setting of Heslington village and key views. To mitigate any impacts on the historic character and setting of the city the expansion site must create an appropriately landscaped buffer between the site development and the A64. This will be established through the masterplanning of the site.
- 7.10 A development brief for ST27 (also covering updates for development at Campus West and Campus East) will be prepared that will set out detailed considerations

which will meet the aims of the planning consent for the existing Campus East. The existing campus and ST27 will deliver up to 25ha of commercial knowledge based and research led activities appropriate to a university campus. The university development brief will be adopted as a Supplementary Planning Document by the Council.

7.11 ST27 will be accessed from Hull Road via Campus East. In addition, the development should exploit any shared infrastructure opportunities arising from the proximity of the housing allocation at ST15: Land to the west of Elvington Lane to the University of York. For more detailed planning principles for ST27 see Policy SS22: University of York Expansion.

7.12 The campus extension at ST27 will:

- enable the city of York to contribute directly to the delivery of national growth strategies;
- enable key Local Enterprise Partnership priorities to be realised;
- support the York Economic Strategy (2016) and the city's ambitions to be a global competitive city;
- contribute to delivering the local plan vision of supporting the delivery of sustainable economic growth; and
- meet a commercial need and a gap in York's employment land supply to meet the business needs of economic growth sectors.

Delivery

- Key Delivery Partners: City of York Council, University of York and developers.
- Implementation: Planning applications.

Policy ED4: York St. John University Lord Mayor's Walk Campus

The development and redevelopment of York St John University's Lord Mayor's Walk campus will be permitted provided that it is limited to higher education and related uses and its design takes into account the sensitive location of the campus and its setting.

York St. John University must address the need for any additional student housing which arises because of their future expansion of student numbers. In assessing need, consideration will be given to the capacity of independent providers of bespoke student housing in the city and whether it is economically prudent to provide additional student accommodation. To meet any projected shortfall, provision will be expected to be off campus but in locations convenient to the main campus. The reduction of on-campus student provision will be supported subject to adequate provision being made off campus.

See also Policy H7, ED5, D3, D4, D5, D6 and D10

Section 3: Spatial Strategy

- 3.1 This section details the spatial strategy for York by setting out the drivers of growth and factors that shape growth, alongside detailing the key areas of change.

Policy SS1: Delivering Sustainable Growth for York

Development during the plan period will be consistent with the priorities below.

- Provide sufficient land to accommodate an annual provision of around 650 new jobs that will support sustainable economic growth, improve prosperity and ensure that York fulfils its role as a key economic driver within both the Leeds City Region and the York, North Yorkshire and East Riding Local Enterprise Partnership area.
- Deliver a minimum annual provision of 867 new dwellings over the plan period to 2032/33 and post plan period to 2037/38. This will enable the building of strong, sustainable communities through addressing the housing and community needs of York's current and future population.

The location of development through the plan will be guided by the following five spatial principles.

- Conserving and enhancing York's historic and natural environment. This includes the city's character and setting and internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function.
- Ensuring accessibility to sustainable modes of transport and a range of services.
- Preventing unacceptable levels of congestion, pollution and/or air quality.
- Ensuring flood risk is appropriately managed.
- Where viable and deliverable, the re-use of previously developed land will be phased first.

York City Centre, as defined on the Proposals Map, will remain the focus for main town centre uses¹.

The identification of development sites is underpinned by the principle of ensuring deliverability and viability. Additionally, land or buildings identified for economic growth must be attractive to the market.

¹ **Main town centre uses as defined by the NPPF:** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Explanation

Economic Growth

- 3.2 Technical work on economic growth has been carried out for the Council by Oxford Economic Forecasting. This suggests that over the period 2017 to 2038 around 650 additional jobs could be created in the city per annum. The projection shows particularly strong growth in the professional and technical services, accommodation and food services and wholesale and retail sectors. This is consistent with the ambitions of the York Economic Strategy (2016) as encapsulated in the Local Plan vision. If this level of growth is to be achieved it is important that the plan provides the right quanta of land and in the right locations.

Housing Growth

- 3.3 Technical work has been carried out by GL Hearn in the Strategic Housing Market Assessment Update (2017). This work has updated the demographic baseline for York based on the July 2016 household projections to 867 per annum. Following consideration of the outcomes of this work, the Council aims to meet an objectively assessed housing need of 867 new dwellings per annum for the plan period to 2032/33, including any shortfall in housing provision against this need from the period 2012 to 2017, and for the post plan period to 2037/38.

Factors Which Shape Growth

The Character and Setting of the City

- 3.4 The character and form of York provide an overarching narrative for the factors which shape the choices we make in how we accommodate the growth. Their main attributes of that character and form are:
- a compact urban form surrounded by relatively small settlements;
 - a flat terrain providing views particularly of historic landmark features such as the Minster or Terry's Clock Tower;
 - open land which brings the countryside into the city through ings, strays and associated land; and
 - key arterial routes that influence urban form.
- 3.5 Technical work carried out by the Council indicates that, regardless of the extent to which the city may have to identify further land to meet its development requirements and needs, there are areas of land outside the existing built up areas that should be retained as open land due to their role in preserving the historic character and setting of York. This work also indicates that there are areas of land outside the built up areas that should be retained as open land as they prevent communities within the environs of York from merging into one another and the city. These areas are considered to have a key role in preserving the identity of the settlements and villages around York. The relationship of York to its surrounding settlements is an important aspect of the city's character. The areas of land considered to serve this purpose are illustrated in Figure 3.1. Further detail on this can be found in the Historic Character and Setting Technical Paper Update (2013).

fully occupied apart from a 1ha area of undeveloped land which has detailed B2/B8 consent. There are currently 28 companies located on the park employing more than 450 people. Companies include York Mailing, Paragon Creative, DGP Group and the Potter Group. Evidence indicates there is existing demand for new space (5 current occupiers considering expansion in the next 5 years) and there is a current shortage of B2/B8 units to the south and east of York.

- 3.96 The site adjoins the existing free standing Airfield Business Park to the south and west of Elvington Village. The site is partially contained and is a mixture of rough scrubland/grass to the north and west of Brinkworth Rush and predominantly agricultural land (Grade 2 and 3a) to the south of Brinkworth Rush. There is an area of woodland to the west of the site along with woodland strips on field boundaries to the south and west which provide a degree of containment. The proposed site represents a limited extension of the built area within a setting that is in part a legacy of the wartime development of the airfield.
- 3.97 The site is adjacent to the existing Airfield Business Park and is a reasonable distance to the A64. The site is suitable for B2/B8 uses as these would produce fewer trips than B1a (office) uses and would be easier to mitigate.

Delivery

- Key Delivery Partners: City of York Council; landowners; developers; and infrastructure delivery partners.
- Implementation: Planning applications; and developer contributions.

Policy SS22: University of York Expansion

University of York Expansion (ST27) will provide B1b employment floorspace for knowledge based businesses including research-led science park uses and other higher education and related uses (see Policy ED3: Campus East). A development brief will be prepared for ST27, covering site considerations, including landscaping, design, local amenity, accessibility and transport requirements. In addition to complying with the policies within this Local Plan, the site must be delivered in accordance with the following key principles.

- i. Create an appropriately landscaped buffer between the site and the A64 in order to mitigate heritage impacts and to maintain key views to the site from the south and its setting from the A64 to the south and east.
- ii. The developed footprint (buildings, car parking and access roads) shall not exceed 23% of the total site area.
- iii. Enhance and continue the parkland setting of the existing university campus, with new buildings being of a high design standard.
- iv. Provide additional student accommodation, which is clearly evidenced in terms of demand.
- v. Deliver high quality, frequent and accessible public transport services to York City Centre. It is envisaged such measures will enable upwards of 15% of trips to be undertaken using public transport.

- vi. Optimise pedestrian and cycle integration, connection and accessibility in and out of the site and connectivity to the city and surrounding area to encourage the maximum take-up of these more ‘active’ forms of transport (walking and cycling).
- vii. Demonstrate that all transport issues have been addressed, in consultation with the Council and Highways England as necessary, to ensure sustainable transport provision at the site is achievable. The impacts of the site individually and cumulatively with site ST15 should be addressed.
- viii. Explore providing access through an enhanced road junction on the A64 to the south of the site. There may also be an opportunity for a further restricted/limited southern access to the University off the A64 in conjunction with ST15 (Land West of Elvington Road). Access to the A64 would require approval of Highways England.
- ix. Exploit synergies with ST15 (Land West of Elvington Road) with regard to site servicing including transport, energy and waste.

Explanation

- 3.98 The University of York is a key component of the long term success of the city and it is important to provide a long term opportunity for the University to expand. It offers a unique opportunity to attract businesses that draw on the Universities applied research to create marketable products. There is lots of evidence from around the country that shows the benefits of co-location of such businesses with a University. The University proposal is a key priority in the Local Economic Plan Growth Deal that has been agreed with the government and is also included as a priority area in the York Economic Strategy (2016) which recognises the need to drive University and research led growth in high value sectors. The site will also facilitate the re-configuration of the existing Campus 3 site to provide additional on-campus student accommodation helping to reduce the impacts on the private rented sector.
- 3.99 A broadly four sided site which is generally well contained on three sides. The northern boundary is Low Lane, a narrow single track country lane which runs from Heslington in an easterly direction, to the point where it turns northwards towards the University campus. The boundary treatment is a hedge with intermittent trees along its edge. From the point where Low Lane turns northwards, the site boundary heads south east towards the Ring Road and the flyover (track which leads towards Grimston Grange). This part of the boundary is denoted by a post and wire fence at the bottom of an embankment, over looking the new velodrome. From this point, the sites south east boundary runs along the alignment of the Ring Road in a south westerly direction (with hedge and ditch boundary), to the next field boundary, where it cuts across the southern edge of the site. This boundary consists of a hedge field boundary to the point where it meets Green Lane, a narrow track bounded by hedges and trees on both sides, to the point where it meets Low Lane. Green Lane forms the western boundary of the site.
- 3.100 The existing Heslington East campus is designed and established to offer significant proportions of journeys by walking, cycling and public transport. Any future proposals must continue this existing provision (including bus services).
- 3.101 The Heslington East Campus Extended Master Plan (June 2014) shows no additional entry points into the Campus from those already existing (Lakeside Way

(bus and cycle only), Field Lane/Kimberlow Lane and Kimberlow Lane running south from Hull Road Grimston Bar Park & Ride link road.

Delivery

- Key Delivery Partners: City of York Council; landowners; developers; and infrastructure delivery partners.
- Implementation: Planning applications; and developer contributions.

Policy SS23: Land at Northminster Business Park

Land at Northminster Business Park (ST19) will provide 49,500sqm across the B1, B2, B8 uses based on a split of approximately 40/60 B1a to B2/B8 which is the current ratio at the existing business park. In addition to complying with the policies within this Local Plan, the site must be delivered in accordance with the following key principles.

- Provide for a sustainable business park to help meet the city's employment needs, ensuring that its composition reflects the economic vision of York.
- Develop a comprehensive scheme which is linked to the existing business park.
- Provide access to the site via the existing Northminster Business Park entrance to the A59.
- Promote sustainable transport solutions linking the proposed site to the Park & Ride.
- Optimise integration, connectivity and access through the provision of new pedestrian, cycle, public transport and vehicular routes to ensure sustainable movement into, out of and through the site. The site is in a sustainable location with access to the Poppleton Bar Park & Ride offering frequent bus routes to the city centre, access to Poppleton Rail Station and vehicular access to the A59.
- Provide a high quality landscape scheme in order to mitigate impacts and screen the development providing an appropriate relationship with the surrounding landscape. Attention should be given to the site's relationship with the countryside to the west of the site, to the southern boundary of the site, with Moor Lane (bridleway) and the village of Knapton.
- Ensure that the residential amenity of neighbouring residential properties is maintained.
- Prepare a desk based archaeological assessment to inform the site masterplan.

Explanation

3.102 The allocation is reflective of forecast need for B1c/B2/B8 uses over the plan period and a need for the Local Plan to allocate a range of employment sites to promote choice to the market. The site offers the opportunity for a phased approach to extending the existing Northminster Business Park which has proven to be an attractive choice to the market for these uses. The site scores well in the Employment Land Review in terms of market attractiveness and investment opportunities.

3.103 The site is well contained on three of its four sides, and most of its fourth side. The northern boundary (with the existing business park) consists of very tall hedges, as

Section 4: Economy and Retail

- 4.1 It is important that the plan helps to deliver the city's economic ambitions by providing sufficient land to meet the level of growth set out in the Spatial Strategy. An Employment Land Review (2016) (ELR) has been prepared which brings together evidence on the demand for and supply of employment land. Demand has been calculated using a well established method of converting econometric forecasts into floorspace/employment land. The starting point for this was job growth forecasts by Oxford Economics (OE) wherein a baseline scenario and two further scenarios were considered; scenario 1 – higher migration and faster UK recovery, which identified and scenario 2 – re-profiled sector growth. Scenario 2 was endorsed as it reflected the economic policy priorities of the Council to drive up the skills of the workforce and encourage growth in businesses which use higher skilled staff. Scenario 2 will enable York to realise its economic growth ambitions as set out within the York Economic Strategy (2016), contributing to a vibrant economy.
- 4.2 The OE forecasts indicate jobs growth to be 650 jobs per annum over the plan period. To sensitivity test the 2015 OE projections, the latest Experian economic forecasts used within the Regional Econometric Model have been used. It is important to ensure there is sufficient flexibility within the land supply for a range of scenarios rather than an exact single figure which one can precisely plan to with complete certainty. In summary the Experian model broadly supports the original growth projections included in the OE 2015 model.
- 4.3 The policies in this section identify the locations that will accommodate employment uses, protect the overall supply of employment sites and address specific aspects of economic growth including the impact of business activity in residential areas, tourism and rural business.
- 4.4 Finally this part of the Plan deals with the specific planning issues raised by the growing and changing retail sector of the local economy, including the retail hierarchy and provision in different locations – the city centre, district centres, local centres, neighbourhood parades and out of centre.

Policy EC1: Provision of Employment Land

Provision for a range of employment uses during the plan period will be made on the following strategic sites (those over 5ha):

Site	Floorspace	Suitable Employment Uses
ST5: York Central	100,000sqm	B1a
ST19: Land at Northminster Business Park (15ha)	49,500sqm	B1c, B2 and B8. May also be suitable for an element of B1a.
ST27: University of York Expansion (21.5ha)	Campus East and ST27 will across both sites deliver up to 25ha of B1b knowledge based businesses including research led science park uses identified in the existing planning permission for Campus East.	
ST26: Land South of Airfield Business Park, Elvington (7.6ha)	25,080sqm	B1b, B1c, B2 and B8.
ST37: Whitehall Grange, Wigginton Road (10.1ha)	33,330sqm	B8

York City Centre will remain the focus for main town centre uses (unless identified above). Proposals for main town centre uses for non city centre locations will only be considered acceptable where it can be demonstrated that they would not have a detrimental impact on the city centre's vitality and viability and the sustainable transport principles of the Plan can be met.

Provision for a range of employment uses during the plan period will be made on the following other sites:

Site	Floorspace	Suitable Employment Uses
E8: Wheldrake Industrial Estate (0.45ha)	1,485sqm	B1b, B1c, B2 and B8.
E9: Elvington Industrial Estate (1ha)	3,300sqm	B1b, B1c, B2 and B8.
E10: Chessingham Park, Dunnington (0.24ha)	792sqm	B1c, B2 and B8.
E11: Annamine Nurseries. Jockey Lane (1ha)	3,300sqm	B1a, B1c, B2 and B8.
E16: Poppleton Garden Centre (2.8ha)	9,240sqm	B1c, B2 and B8. May also be suitable for an element of B1a.
E18: Towthorpe Lines, Strensall (4ha)	13,200sqm	B1c, B2 and B8 uses.

See also Policy SS1, SS22 and ED3

Explanation

- 4.5 The Local Plan identifies land that is suitable to provide for the forecast growth in the York economy and protects this land from other uses. Specific policies are included in Section 3: Spatial Strategy to guide the implementation of development on the strategic employment sites which include detailed planning principles.

- further sites that come forward during the plan period will be determined in accordance with Policies H5 and H6 criteria vi – x. These consider the provision of storage and recreation space, amenity provision, size and density of pitches/plots, landscaping of the site, amenity of nearby residents and future occupiers of the site.
- 5.43 A condition will be attached to any permission to ensure that the sites remain in use by Gypsies and Travellers or Travelling Showpeople, as appropriate and the number of pitches and plots are retained to ensure a supply to need demand.

Delivery

- Key Delivery Partners: City of York Council, Developers, Housing Charities, Gypsy, Roma, Traveller and Travelling Showpeople stakeholders
- Implementation: Planning applications and strategic site masterplans

Policy H7: Student Housing

The University of York and York St. John University must address the need for any additional student housing which arises because of their future expansion of student numbers. In assessing need, consideration will be given to the capacity of independent providers of bespoke student housing in the city and whether it is economically prudent to provide additional student accommodation. To meet any projected shortfall, provision by the University of York can be made on either campus. Provision by York St. John University is expected to be off campus but in locations convenient to the main campus.

SH1: Land at Heworth Croft, as shown on the proposals map, is allocated for student housing for York St. John University students.

Proposals for new student accommodation will be supported where:

- i. there is a proven need for student housing; and
- ii. it is in an appropriate location for education institutions and accessible by sustainable transport modes; and
- iii. the development would not be detrimental to the amenity of nearby residents and the design and access arrangements would have a minimal impact on the local area.

Conditions will be used to ensure the proper management of the accommodation in the interests of the amenity of adjacent properties and that any development remains occupied by students in perpetuity, unless and until an alternative use is approved by the Council.

See also Policy ED1 and ED5

Explanation

- 5.44 Students form an important element of the community and the presence of a large student population contributes greatly to the social vibrancy of the city and to the local economy. The Council are committed to ensuring their needs are met and will continue to work with the city's higher education institutions in addressing, and better understanding, student housing needs.

- 5.45 The Council encourages purpose-built student housing where there is a proven need and it is designed and managed in a way that attracts students to take it up. This can free up housing suitable for wider general housing needs, taking pressure of the private rented sector and increasing the overall housing stock. There should be no unacceptable impact on amenity for local residents. In the interests of the proper management of the student accommodation and to protect the amenity of adjacent residents, where permission is granted it will be subject to a planning condition requiring that prior to the accommodation being occupied a management plan shall be agreed in writing with the Council to demonstrate the control of the following:
- information and advice to occupants;
 - any necessary garden landscaping maintenance; and
 - refuse and recycling facilities.
- 5.46 A further condition will be attached to any permission to ensure that the accommodation remains occupied by students. Without such a condition it would be necessary to consider the scheme for affordable housing given that there may be the opportunity for non students to occupy the properties.
- 5.47 Whilst it is recognised that counting students can be difficult and student numbers can vary depending on what source or definition is used, applicants should present a proven need for student housing by providing an assessment of:
- existing and likely future student numbers and numbers requiring accommodation taking into account the proportion of students who study from home
 - a review of the current level of provision, including the level of vacancies and the quality of accommodation
 - the likely future supply of accommodation based on extant planning permissions
- 5.48 Only full time students should be included in the analysis. Part-time students should be excluded based on the assumption that they are already housed for the duration of their part-time studies.

Delivery

- Key Delivery Partners: Developers; and Further and Higher Education Establishments.
- Implementation: Planning applications

Policy H8: Houses in Multiple Occupation

Applications for the change of use from dwelling house (Use Class C3) to HMO (Use Class C4 and Sui Generis) will only be permitted where:

- i. it is in a neighbourhood area where less than 20% of properties are exempt from paying council tax because they are entirely occupied by full time students, recorded on the Council's database as a licensed HMO, benefit from C4/Sui Generis HMO planning consent or are known to the Council to be HMOs; and
- ii. less than 10% of properties within 100 metres of street length either side of the application property are exempt from paying council tax because they are

Delivery

- Key Delivery Partners: City of York Council; Neighbouring Local Authorities; infrastructure delivery partners; developers; and landowners.
- Implementation: Through all Local Plan policies; planning applications; and developer contributions.

Policy SS2: The Role of York’s Green Belt

The primary purpose of the Green Belt is to safeguard the setting and the special character of York and delivering the Local Plan Spatial Strategy. New building in the Green Belt is inappropriate unless it is for one of the exceptions set out in policy GB1.

The general extent of the Green Belt is shown on the Key Diagram. Detailed boundaries shown on the proposals map follow readily recognisable physical features that are likely to endure such as streams, hedgerows and highways.

To ensure that there is a degree of permanence beyond the plan period sufficient land is allocated for development to meet the needs identified in the plan and for a further minimum period of five years to 2038.

Explanation

- 3.13 The boundary of the Green Belt is the consequence of decisions about which land serves a Green Belt purpose and which can be allocated for development. The Plan seeks to identify sufficient land to accommodate York’s development needs across the plan period, 2012-2033. In addition, the Plan provides further development land to 2038 (including allowing for some flexibility in delivery) and establishes a Green Belt boundary enduring for at least 20 years. In this Local Plan the Green Belt’s prime purpose is that of preserving the setting and special character of York. This essentially comprises the land shown earlier in the section at Figure 3.1.
- 3.14 Over and above the areas identified as being important in terms of the historic character and setting of York other land is included to regulate the form and growth of the city and other settlements in a sustainable way. This land will perform the role of checking the sprawl; safeguarding the countryside from encroachment; and encouraging the recycling of derelict and other urban land.
- 3.15 In defining the detailed boundaries of the Green Belt care has been taken to follow readily recognisable physical features that are likely to endure such as streams, hedgerows, footpaths and highways. Clearly it will not always be possible to do this because of factors on the ground and where this is the case there will be a clear logic to the boundary that can be understood and interpreted on the ground.

Delivery

- Key Delivery Partners: City of York Council; Neighbouring Local Authorities; infrastructure delivery partners; developers; and landowners.
- Implementation: Through all Local Plan policies; planning applications; and developer contributions.

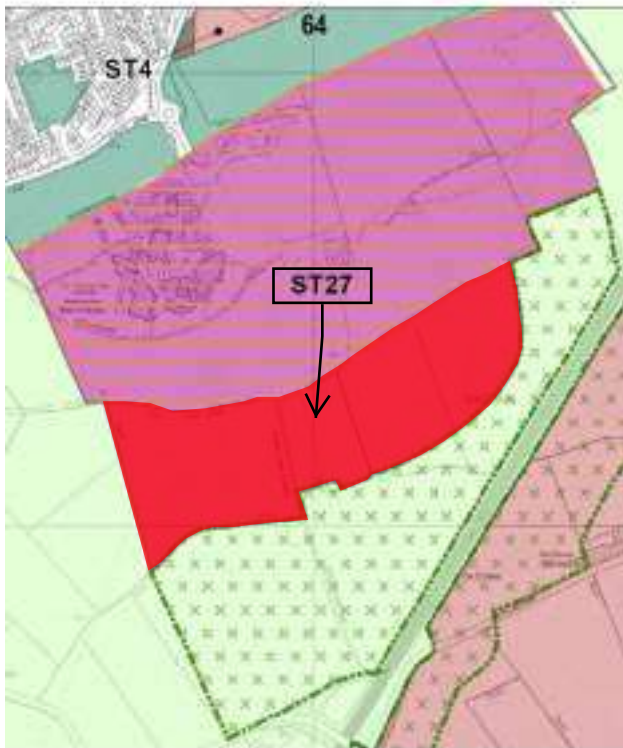
APPENDIX 5

Proposed changes to the Local Plan Publication Draft 2018

- 5.1 Proposed boundaries for campus extension with buffer zone
- 5.2 Areas of contention in the Publication Draft Green Belt boundary
- 5.3 Green Belt boundary as proposed by City of York Council and University of York

APPENDIX 5

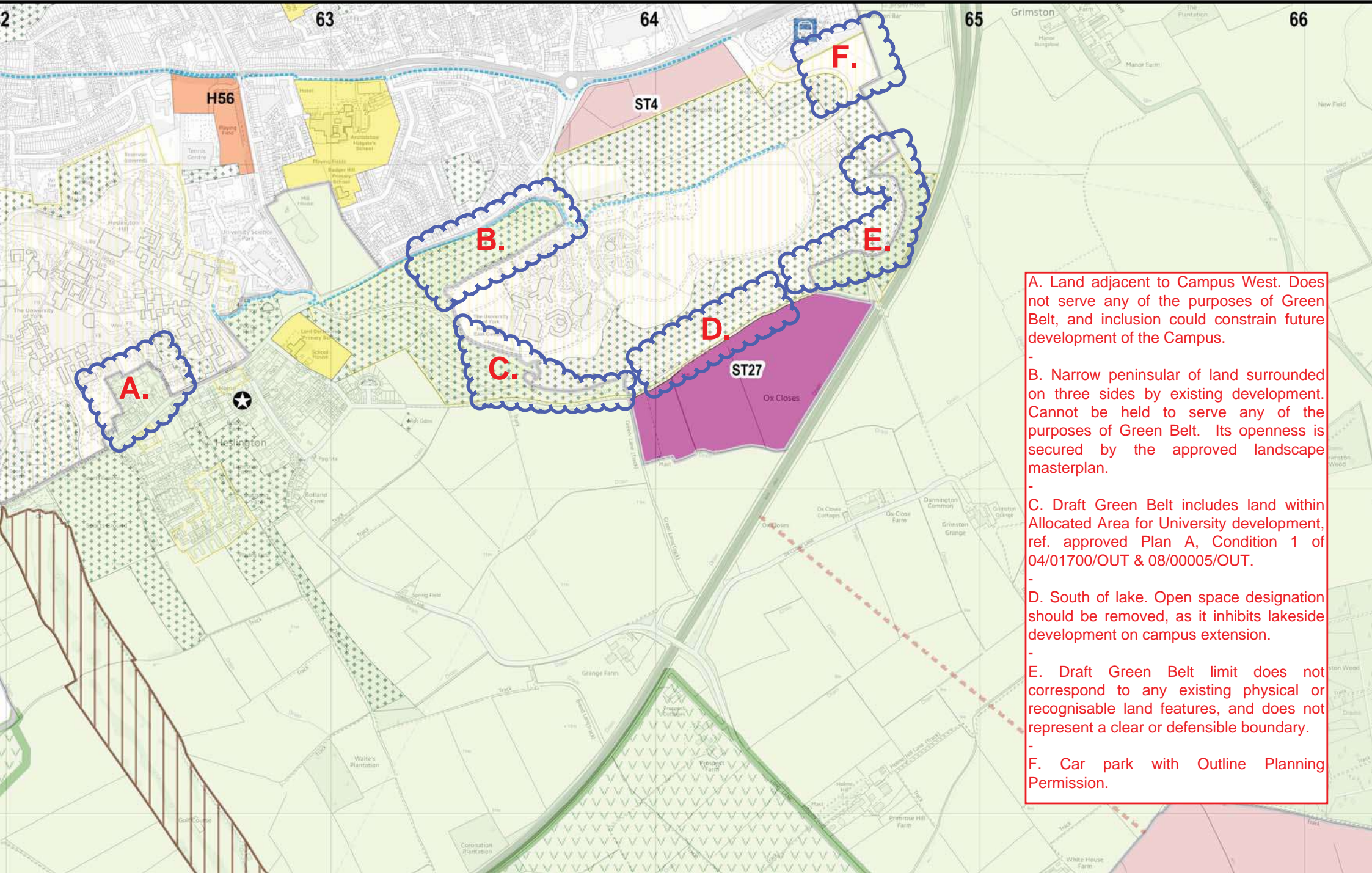
5.1 Proposed boundaries for campus extension with buffer zone



■ Proposed extension area

APPENDIX 5

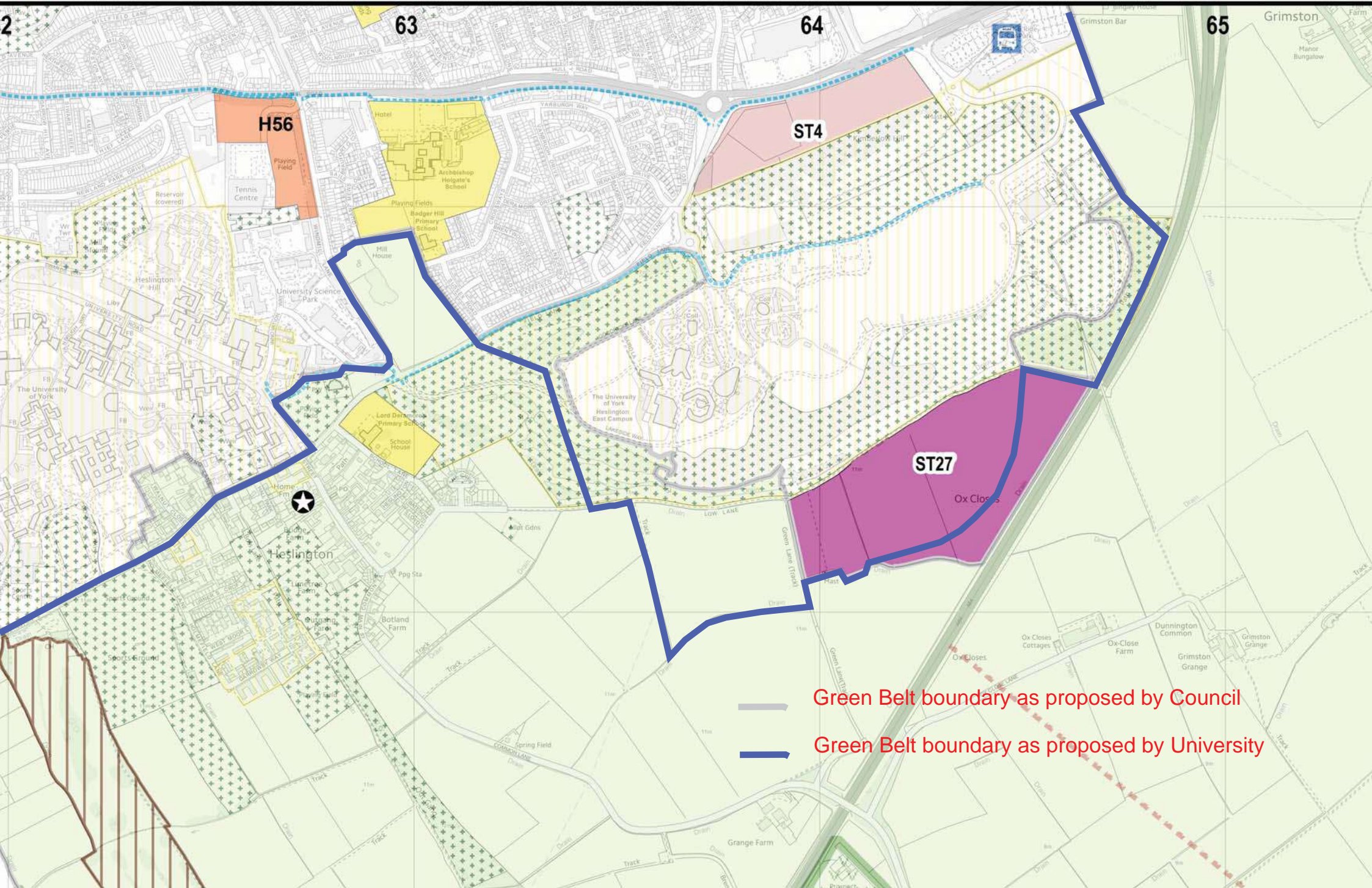
5.2 Areas of contention in the Publication Draft Green Belt boundary



- A. Land adjacent to Campus West. Does not serve any of the purposes of Green Belt, and inclusion could constrain future development of the Campus.
-
- B. Narrow peninsular of land surrounded on three sides by existing development. Cannot be held to serve any of the purposes of Green Belt. Its openness is secured by the approved landscape masterplan.
-
- C. Draft Green Belt includes land within Allocated Area for University development, ref. approved Plan A, Condition 1 of 04/01700/OUT & 08/00005/OUT.
-
- D. South of lake. Open space designation should be removed, as it inhibits lakeside development on campus extension.
-
- E. Draft Green Belt limit does not correspond to any existing physical or recognisable land features, and does not represent a clear or defensible boundary.
-
- F. Car park with Outline Planning Permission.

APPENDIX 5

5.3 Green Belt boundary as proposed by City of York Council and University of York



H56

ST4

ST27

Green Belt boundary as proposed by Council
Green Belt boundary as proposed by University

UNIVERSITY OF YORK - GROWTH
RATIONALE FOR CAMPUS EAST
EXTENSION TO SOUTH OF THE LAKE

Submission to the City of York Local Plan

UNIVERSITY *of York*

Executive Summary

This report provides growth scenarios that evidence why the entire 26ha (ST27) site to the south of lake on Campus East is needed within the next 20 year as further extension land for the University's own space and knowledge exchange space that supports growth of the wider economy. It is part of a suite of documents from technical experts brought together by O'Neill Planning Associates to form the University's final representations to the City of York Local Plan.

It is authored by Stephen Talboys, Director of Estates and Campus Services with contributions from university colleagues: Mark Gunthorpe, Head of Economic Development and Jon Timms, PVC for Partnerships and Knowledge Exchange, as well as from James Redman from Make Architects and Stephen Nicol from Nicol Economics. It is authorised for issue by Saul Tendler, the University's Deputy Vice Chancellor.

It concludes that the ST27 site as proposed by the City Council in their Local Plan is inadequate to meet the needs of the University over the plan period, and its ambitions to develop business and knowledge exchange activity on to the Campus

Introduction

This report is prepared by Stephen Talboys, the University of York's Director of Estates and Campus Services to explain the University's need for further development land within the City of York Council's Local Plan allocation process.

Stephen is a Chartered Surveyor, trained in planning and development surveying and a Chartered Civil Engineer. Stephen has over 20 years senior level experience in managing built environment related issues. He has particular expertise in leading large public-private regeneration and investment programmes, including education projects. For the last five years he has been a Director of Estates in Universities, fulfilling this role for York since November 2016.

Part of Stephen's role at York is to ensure effective planning of the estate for the immediate, medium and longer term, including leading the current campus master planning process under the oversight of the University's Executive Board and University Council (Governing Body).

In this regard, the University has formally requested 26ha of land be allocated for development on the south side of the lake on Campus East. This is adjacent to the land granted consent (by the Secretary of State) for the existing campus extension, known now as Campus East. In the current draft Local Plan, which is intended to plan land use to 2038/39. The City Council has only allocated 21ha of land to the south of the lake within the draft local plan, which once a suitable buffer is provided leaves about 13ha for development of further University and Knowledge Exchange Space. The University considers that this proposed 21ha allocation is grossly insufficient to meet its medium term needs from the middle of the next decade onwards and thereafter within the remainder of the plan period. Failing to make adequate provision will actively hamper the success of the University to the detriment of the City and its economy. Furthermore, the site the Local Plan proposes is too close to the A64 and too far away from the heart of Campus East.

Why does the University need to Grow?

The University of York is a member of the Russell Group of leading UK universities, is growing and is highly successful. It delivers world-class research and top-quality teaching and is a member of the N8 Research Partnership – a collaboration of the eight most research-intensive Universities in the North of England. The creation of a new International Pathway College has further added to the University of York's offer, and acts as a feeder to both its Undergraduate and Postgraduate courses. Its continued high-ranking in the league tables make it a popular choice for home, EU and overseas students.

To remain successful and sustainable over the medium to long term, the University will need to continue to grow beyond the current student members of about 17,200 (FTE). This is important because as the University's size increases to the (current) average size of Russell Group Universities, its sustainability and contribution to the city and region will improve significantly. Given that the University is currently well below the size of the average Russell Group, both overall and in many key programmes, it has significant need to continue to grow, especially in programmes that are popular with overseas students.

How has it grown over recent decades?

The University has grown successfully since its formation in 1963 when it started with just 230 students. But even 25 years ago it contributed much less to the economic fortunes of the City than it does now. Whilst by 1993, it had grown to about 8,500 students, it was reaching capacity on its original campus. By the time it submitted plans for its campus extension in 2004 it had grown to 10,000 students. The extension now known as Campus East was built on greenbelt land, having been consented by the Secretary of State. This release of the greenbelt land has allowed York to increase by 7,000 students over the last 14 years. The rate of development has overall been more rapid than anticipated.

Knowledge Based Industries

The main exception to this rapid growth has been the rate of take up of space by knowledge based industries on Campus East. The University's existing Science Park, built in the 1990s, has remained mostly full, with very few voids throughout that period. Campus East aimed to engage and promote knowledge exchange through five buildings: The Catalyst, The Ron Cooke Hub, the Law & Management Building, Computer Science Buildings and the Theatre, Film and TV (TFTV) Buildings. These buildings were 49% funded by European Regional Development Funding (ERDF) with an ERDF value of around £15.5m. This funding was provided so that the buildings would facilitate knowledge exchange activity, as opposed to simply being for research and teaching. As is often the case with these projects, there was an inevitable lag whilst industry populated the new buildings, which was exacerbated by the recession from 2008.

The 2,900 sq m Catalyst building was opened in 2011 to support the growth and development of early stage companies in the creative, IT, digital and media sectors. This building took some time to fully occupy but is now effectively fully let and popular with its tenants.

Table 1: Catalyst Building Occupancy

Year	Occupancy %
1/2/2012	8
1/2/2013	70
1/2/2014	75
1/2/2015	82
1/2/2016	86
1/2/2017	95
1/2/2018	98

The Ron Cooke Hub is a £20million, 6,100 sq m 'melting pot' for engagement. Its design encourages discussion and interaction, bringing people together across disciplines and sectors, from within and outside of the University, providing space for new value-adding ideas and partnerships to blossom. This also had ERDF funding to support development of knowledge based businesses and is now full with a mix of these businesses and academic activities.

The Law & Management, Computer Science and TFTV Buildings comprise 19,600 sq m of space which are mainly used for academic purposes but have 2,609 sq m of space allocated to knowledge

exchange , broken down as follows :Law and Management: 1,118 sq m (17.7%);Computer Science: 805 sq m (11.8%);TFTV: 686 sq m (10.6%). All five building projects have met their aims in line with the ERDF criteria.

Developing knowledge based facilities is complicated, requires partnering and external funding. It also requires the land to be available and developable within funding horizons of the relevant third parties. One such opportunity the University developed was a project to provide improved facilities on Campus East for Biovale. Biovale is an important project that promotes the Yorkshire and Humber as thriving centre of successful innovation for the bio-economy and helps regional enterprises profit from the valuable business opportunities in this high growth sector. The capital part of the proposal was ultimately unsuccessful in securing the necessary structural funds for the new facility from the Local Enterprise Partnership. This facility would have used up much of the balance of the land (with outline consent) on Campus East.

Throughout 2017 the University then also entered detailed negotiations as a bidder for an opportunity to host a major partnership project with the British Museum to develop a significant new collection storage and research facility: the British Museum Archaeological Research Collection (BM_ARC). This was planned for Campus East. In the end the University withdrew from the latter stages of the process: as the facility would have used up much of the available land. This predated the Local Plan and without confidence that the 26ha of land would be released for development the University was unwilling to “lose” the balance of its land to the British Museum. The project is now developed with the University of Reading, and is considered to be a major missed opportunity for the university directly attributable to the City Council failing to promote a local plan with adequate provision with all due expedition.

These two examples show the importance of having space on the University campus to capitalise on major inward investment opportunities that seek location on the University’s campuses.

With the on-going investment in Campus East of the new £7m Retail Park, the £26m Piazza building and the procurement of a partner to deliver 1,200 more student beds, Campus East is becoming a more popular destination for investment by 3rd parties. The University is currently dealing with live enquiries from knowledge based businesses that would like to be located there and is confident that over time the land allocated to business will be popular and needed to support economic growth of the City.

Therefore, the University is confident that further land will be required for the growth anticipated over the next 20 years, necessitating land for further academic space, space for students to live, supporting research space and space to exchange knowledge. The University’s approach is to masterplan this in mixed-use phases, with each one comprising a blend of these uses to ensure vibrancy and positive interaction, especially between academics and industry (knowledge exchange).

Growth Scenario Planning

The starting point for considering future growth is to consider the growth already achieved between 2009 and 2017 following the creation of Campus East. This increased FTE student numbers from 12,710 to 16,475, which is 30% growth over that period, equating to about 4% growth p.a.

The University needs space to continue to grow for its own uses. It also wishes to develop close partnership with business, bringing them onto campus and develop a pipeline of activity with businesses that allow students to interact with start-ups and SMEs, and also provide a research pipeline from the labs to products: all of which would benefit the local economy.

For space planning purposes, a number of indicative scenarios have been modelled based on potential growth in student numbers:

1. Scenario 1: Growth of 0.5% p.a. to 2038.
This is considered highly unlikely, given York's popularity, and our record of growth in student numbers over the last decade, potential and aspiration to grow towards the current Russell Group average. Given the major lost opportunity this would represent for the City's economy, a very limited growth strategy would also be unlikely to be supported by key stakeholders including local businesses, the LEPs and City Council.
2. Scenario 2: 1% growth p.a. to 2038
This is also considered unlikely for the same reasons given in 1 above.
3. Scenario 3: 1.25% growth p.a. to 2038.
This is a more likely scenario than 2, more closely matching to York's popularity, proven growth and potential to grow further but would still have York underperforming in the early years (in student numbers) when compared with the current average of the Russell Group and this doesn't allow for other Russell Group HEIs continuing to grow.
4. Scenario 4: 1.5% growth p.a. to 2038
This is still a likely scenario.
5. Scenario 5: 2% growth p.a. to 2038
This is a realistic possibility given it is at a rate equal to half the growth the University has achieved over the last 10 years.
6. Scenario 5: 4% growth p.a. continues the trajectory that the University has been on over the last 10 years. This is less likely than Scenario 4 but modelled for completeness.

Of these scenarios we consider that 3 and 4 are the minimum prudent scenarios for planning purposes at this stage for the Local Plan.

Methodology

The University has a working space model for these scenarios. This plans residential space, academic and supporting space needs. The University has a (soft) College model where its residential space is grouped together into Colleges that form a community for sport, social, catering

and welfare purposes. There are currently nine Colleges, typically of about 600 beds but with one Halifax College at over 1,000 beds. For ease of explanation in this paper and the accompanying model, the future residential development has been explained in terms of further Colleges.

1. The approach in the model takes the total number of students as forecasted and splits these into intake students (new as UGs, IPC students or post graduate first years) and returning students.
2. The University's policy is to seek to offer all intake students a bed on campus and going forward to market bedrooms to achieve 15% of returning students living on campus and this has been included in the model. The model also deducts 12% for live at home students who will not require accommodation in York. This then calculates the potential student residents within each scenario.
3. The University policy on student accommodation takes account of City of York Council planning policy and existing planning consent conditions relating to Campus East development. This states that the University will provide enough bed spaces to cope with demand from our expansion in student numbers. This agreement ensures that as the University expands it does not place more students in HMO (houses in multiple occupation) and thus place additional pressure on the York rental market. There have been pockets of tension in the city between local communities and students living within these communities owing to poor student behaviour. In order to conform to this agreement, achieve the expansion plans in the medium to long term and reduce the opportunity for tension a greater area of land allocation on Campus East is required.
4. The supply of student beds is included within the model and shows 5,700 existing beds on campus and 400 beds contracted off campus with a nominations agreement until 2021.
5. The University is currently procuring a residential scheme, which is the equivalent of two further Colleges i.e. 1,200+ beds to be built by a Design Build Finance Operate partner on campus east. College 10 of 600 beds will open in 2020 and a further 600 will open by no later than 2021 in College 11.
6. The University then has a planned set of demolitions and replacements of student beds on campus west equivalent in net terms to introducing a College 12.
7. This will be supplemented by the creation of additional beds Colleges 13, 14, 15, and 16 etc as necessary. The demand and supply of beds is then compared year on year when beds are needed.

Similarly, using the University's space norms and experience of planning previous areas of development, the demand for academic space for teaching, offices and research is calculated, along with the commercial/retail space needed to create a mixed-use community. In creating this plan suitable, space for knowledge exchange and job creation has also been included.

Site Selection

The planning case deals with the land options for accommodating this demand. In theory, this quantum of development could be delivered on an alternative site (albeit developable land supply in York is heavily constrained). Building on an alternative site that was not contiguous with the existing campus would seriously detract from teaching and research quality, whilst also increasing operating costs more than a single site solution. Both these factors would have an adverse impact of the University's sustainability and success, as well as give rise to the potential for unsustainable travel

patterns to be developed. The supporting planning statement records the consideration that has been given to alternative solutions and why there really is no “plan B” available to the University.

Therefore, the recommended option is to develop the farmland available to the south of the existing Campus East lake. This land is currently in the greenbelt but has the potential, subject to planning consent, to support the further development of University space. The City Council has accepted through its current draft Local Plan the principle of taking some of this land out of the greenbelt to support the University’s further expansion. However, the Council is proposing to allocate a smaller site than the 26ha site the University has proposed and will require to accommodate the needs that are likely to arise within the Local Plan period.

From a master planning point of view the intention is to build out from the centre of the 26ha site (to the south of the lake). This means that even in early phases of development there is ready access from new buildings (to the south of the lake) to the existing hub buildings: the Ron Cooke Hub and Piazza Building across a new footbridge.

Results

The modelling undertaken has evidenced how much developed space would be required under each growth scenario and how this might fit on the land to the south of Campus East, compared against the reduced site as proposed in allocation ST27 and the entire site as proposed by the University. A summary of the results from the model is presented below. This is then also presented spatially on the master plan.

Summary Table taken from Space Modelling

Scenario	1	2	3	4	5	6
Growth						
Growth Assumption	0.50%	1.00%	1.25%	1.50%	2.00%	4.00%
Student Nos at 2038 (fte) ¹	19,114	21,213	22,344	23,531	26,089	39,224
Additional total student numbers (fte)	1,901	4,000	5,131	6,318	8,876	22,011
Residential Demand vs Supply						
Student Beds needed	8,836	9,807	10,329	10,878	12,061	18,133
Supply to a maximum of 10760 beds on Campus East	8,760	9,760	10,760	10,760	10,760	10,760
No of Colleges needed (each of 600 - 1000 beds)	14	15	16	16	18	25
No of additional Colleges needed	3	4	5	5	7	14
Academic and Supporting Space						
Additional space required for staff to support increase in Student Numbers (NIA meters squared)	1,901	4,000	5,131	6,318	8,876	22,011
Additional teaching space required for increase in Student Numbers (NIA meters squared)	1,855	3,905	5,008	6,167	8,664	21,486
Additional space for central support (Library and central support services)	3,862	8,129	10,426	12,840	18,038	44,731
Additional space for catering	10,379	21,845	28,018	34,503	48,473	120,204
Additional space for commercial/retail	552	1,162	1,490	1,835	2,578	6,394
Additional research space not offices	1,266	2,663	3,416	4,207	5,910	14,656
Additional Lab space not research	2,120	4,462	5,723	7,048	9,901	24,552
NIA	20,587	43,328	55,572	68,435	2,578	238,417
GIA (85% gross to net)	24,220	50,974	65,378	80,512	96,142	280,491
Academic space (sqm) <u>south of lake</u>	0	18,500	31,750	48,000	63,700	248,000
Knowledge exchange space (sqm) <u>south of lake</u>	0	10,800	23,900	36,000 ³	47,000 ³	185,000 ³
Knowledge exchange land area (ha) <u>south of lake</u>	0	1.2	3.4	5.1 ³	6.7 ³	26.4 ³
Knowledge exchange land area (%) <u>south of lake</u> ²	0%	5%	13%	17%	17%	24%
Percentage of 26 ha required	13%	56%	92%	115%	150%	420%
Ha required	3.5	14.7	23.9	30.0	39.5	110.0

Footnotes

1. Overall student FTE projections (excluding visiting students, students in the initial year of the IPC, and Centre for Lifelong Learning)

2. i.e. 5% of the available 26ha, not 5% of 56;

3. N.B. this is taking the assumption that we can create a 'what if' situation, where there is an infinite amount of land to expand into, and the masterplan philosophy of mixed use neighbourhoods can be continued

Scenario 1

- Rising to 19,100 students (an overall increase of 11%)
- Requires college 13 (800 beds) and 14 (650 beds) but not college 15 within the next 20 years i.e. by 2038.
- Requires 24,000m² (GIA) of extra academic space by 2038.

This evidences that 13% of the 26 ha site (to the South of the Lake) would be required within the 20 year period. This uses up about one third of the 21ha (13ha net) site proposed by the City Council in the current draft Local plan.

Scenario 2

- Rising to 21,200 students (an overall increase of 23%)
- Requires college 13, 14, and 15 (1,000 beds) within the 20 year period.
- Requires 51,000m² (GIA) of extra academic space by 2038.

This evidences that most (56%) of the 26 ha site is required within the 20 year period. This is slightly more than the 21ha (13ha net) reduced site proposed by the City Council in the current draft Local Plan, with 10,800 sq m of knowledge exchange (KE) space provided to the south of the lake.

Scenario 3

- Rising to 22,300 students (an overall increase of 30%)
- Requires college 13, 14, 15 and half of college 16 (500 beds out of the total 1,000 beds) within the 20 year period i.e. by 2038.
- Requires 65,400m² (GIA) of extra academic space by 2038.

This evidences that almost all (92%) of the 26 ha site is required within the 20 year period, with 23,900 sq m of KE space.

Scenario 4

- Rising to 23,350 Students (an overall increase of 37%)
- Requires college 13, 14, 15, 16 within the 20 year period i.e. by 2038. This just fits on the 26ha of land.
- Would require more than 80,500m² (GIA) of extra academic space. This would not all fit on the 26ha of land and there would be no space for KE.

This evidences that more than the 26 ha of land will be needed for the University to meet its potential by 2038.

Scenario 5

- Rising to 26,000 students (an increase of 52%).
- Requires college 13, 14, 15, 16 within the 20 year period i.e. by 2038. Would also require College 17 and 18 on other land beyond the 26 ha.
- Would require more than 96,000 m² (GIA) of extra academic space. This would not all fit on the 26ha of land. There would be no space for KE.

This evidences that more than the 26 ha of land will be needed for the University to meet its full potential by 2038.

Scenario 6

- Rising to 39,200 students (an increase of 128%).
- Requires college 13, 14, 15, 16 within the 20 year period i.e. by 2038. Supply of beds is 7,300 beds short, requiring nine or more additional colleges but no space exists for them. In this scenario there would be no space for KE.
- Would require more than 280,000m² (GIA) of extra academic space.

This evidences that much more than the 26 ha of land will be needed if the University grew at the same rate as it has done over the last ten years. Even if growth slows, on the basis of this assessment there would be no space for knowledge based industries, which is a key component of the aspiration of the University and the City's economy.

Conclusion

This analysis proves that the planned expansion of the University will require development of the land to south of Campus East for all five scenarios within the 20 year horizon.

At present, scenario 3 and 4 are considered the most likely scenarios. Scenario 3 would require nearly all (at least 92%) of the 26ha of land to the south of the Campus East to be developed by 2038. **They would only allow for either very limited (Scenario 3) or no space at all (Scenario 4) for extra business collaboration space.** This land take is therefore much greater than the 21ha net developable site of 13ha that the Council has offered through the Local Plan process.

This report is prepared alongside the report by Nicol Economics which highlights that the University and its associated activity such as the Science Park already makes a very substantial and measurable contribution to the York economy. In 2016/17 our activities, including the Science Park, supported around 7,800 fte jobs across York or 1 in 12 of all jobs in the city and generated around £370 million in income for people and businesses in York. This contribution has been growing in absolute and relative terms as the University has been able to expand.

Equally significant are the benefits from the University's first class research, our facilities that are available for businesses, our links with local firms and the large pool of skilled graduates we produce every year. These provide critical opportunities and support for York's economy and help create York as a great place to live. This crucial role of the University is fully acknowledged in York's economic strategy, the Local Enterprise Partnership's Strategic Economic Plan and indeed the draft Local Plan itself.

The amount of effective expansion land proposed in ST27 is clearly inadequate for the University's needs and will curtail our growth plans and so future economic contribution in three ways:

- First, by limiting the amount of student and academic accommodation that can be built out and associated scale of the University and its direct contribution to the city's economy
- Second, by limiting the scope for the expansion of our research and associated business collaboration and knowledge transfer activities which are so important for the future economic growth of York and its surrounds in sectors such as biotechnology, bio-renewables, agri-tech and IT/digital. and
- Third, by constraining the amount of business space for "associated business activities" and the ability for the area of Campus East to provide for "B1b knowledge based businesses including research led science park uses". This will limit future inward investment opportunities and the ability of some knowledge-based businesses to expand in York.

This therefore evidences why the University's sustainable future will need the entire 26 ha site for further expansion space within the 20 year horizon of the Local Plan.

Stephen Talboys
Director of Estates and Campus Services

University of York Growth Rationale for Campus Extension
Appendix to illustrate Growth Scenarios

March 2018

SUMMARY OF RESULTS

Scenario	1	2	3	4	5	6
Growth						
Growth Assumption	0.50%	1.00%	1.25%	1.50%	2.00%	4.00%
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Academic and Supporting Space						
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Additional space for catering	10,379	21,845	28,018	34,503	48,473	120,204
Additional space for commercial/retail	552	1,162	1,490	1,835	2,578	6,394
Additional research space not offices	1,266	2,663	3,416	4,207	5,910	14,656
Additional Lab space not research	2,120	4,462	5,723	7,048	9,901	24,552
NIA	20,587	43,328	55,572	68,435	2,578	238,417
GIA (85% gross to net)	24,220	50,974	65,378	80,512	96,142	280,491
m2/additional student	12.7	12.7	12.7	12.7	12.7	12.7
Percentage of 26 ha required	13%	56%	92%	100%+	100%++	100%+++

SCENARIO 1 - PUBLIC INFORMATION
Student Accommodation Supply Demand Plan

1.005 p.a.

Student Bed College/Scheme	Blocks	Masterplan Comment	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	AVE	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39		
DEMAND			Historic Growth										Growth @ 1.005 p.a.																						
Total Students			12,710	13,845	14,605	14,790	15,155	15,290	15,395	16,475		17,213	17,299	17,386	17,472	17,560	17,648	17,736	17,825	17,914	18,003	18,093	18,184	18,275	18,366	18,458	18,550	18,643	18,736	18,830	18,924	19,019	19,114	1,901	
		Growth Index year on year	100	109	105	101	102	101	101	107	104																								
		Cumulative Growth Index	100	109	115	116	119	120	121	130	104																								
Intake Only		All new students on campus	7,470	7,507	7,545	7,583	7,621	7,659	7,697	7,735		7,470	7,507	7,545	7,583	7,621	7,659	7,697	7,735	7,774	7,813	7,852	7,891	7,931	7,970	8,010	8,050	8,091	8,131	8,172	8,213	8,254	8,295		
Returning Students			9,743	9,792	9,841	9,890	9,939	9,989	10,039	10,089		9,743	9,792	9,841	9,890	9,939	9,989	10,039	10,089	10,140	10,190	10,241	10,292	10,344	10,396	10,448	10,500	10,552	10,605	10,658	10,711	10,765	10,819		
New UGH			4,023	4,043	4,063	4,084	4,104	4,125	4,145	4,166		4,023	4,043	4,063	4,084	4,104	4,125	4,145	4,166	4,187	4,208	4,229	4,250	4,271	4,292	4,314	4,336	4,357	4,379	4,401	4,423	4,445	4,467		
New UGO			368	370	372	374	375	377	379	381		368	370	372	374	375	377	379	381	383	385	387	389	391	393	395	397	399	401	403	405	407	409		
Total New UG on Campus			3,908	3,928	3,947	3,967	3,987	4,007	4,027	4,047		3,908	3,928	3,947	3,967	3,987	4,007	4,027	4,047	4,067	4,088	4,108	4,129	4,149	4,170	4,191	4,212	4,233	4,254	4,275	4,297	4,318	4,340		
Total other types Home			2,302	2,314	2,325	2,337	2,348	2,360	2,372	2,384		2,302	2,314	2,325	2,337	2,348	2,360	2,372	2,384	2,396	2,408	2,420	2,432	2,444	2,456	2,468	2,481	2,493	2,506	2,518	2,531	2,543	2,556		
Total other types Overseas			1,913	1,923	1,932	1,942	1,952	1,961	1,971	1,981		1,913	1,923	1,932	1,942	1,952	1,961	1,971	1,981	1,991	2,001	2,011	2,021	2,031	2,041	2,051	2,062	2,072	2,082	2,093	2,103	2,114	2,124		
Returning Home UGs			8,019	8,059	8,099	8,140	8,181	8,221	8,263	8,304		8,019	8,059	8,099	8,140	8,181	8,221	8,263	8,304	8,345	8,387	8,429	8,471	8,514	8,556	8,599	8,642	8,685	8,729	8,772	8,816	8,860	8,904		
Returning Overseas UGs			588	591	594	597	600	603	606	609		588	591	594	597	600	603	606	609	612	615	618	621	624	627	631	634	637	640	643	646	650	653		
A Total Potential student residents			7,957	7,997	8,037	8,077	8,118	8,158	8,199	8,240		7,957	7,997	8,037	8,077	8,118	8,158	8,199	8,240	8,281	8,323	8,364	8,406	8,448	8,490	8,533	8,576	8,618	8,662	8,705	8,748	8,792	8,836		
SUPPLY																																			
On Campus -existing			5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700		5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700		
Noms - Student Castle		Until 2021	400	400	400																														
Other Noms?		?																																	
New Build DBFO (College 10), Western end of Campus East		Opens September 2020						600	600	600																									
New Build DBFO (College 11), Western end of Campus East		Opens September 2021 at latest							600	600																									
New Build Campus West		Equivalent of one College (12) but requires demolition and appropriate funding model as bit by bit development might not be fundable by DBFO																																	
Derwent		Still Current add to Derwent College																				(245)	(245)	(245)	(245)	(245)	(245)	(245)	(245)	(245)	(245)	(245)	(245)	(245)	
Goodricke Peninsula		Still Current, add to James College																				(295)	(295)	(295)	(295)	(295)	(295)	(295)	(295)	(295)	(295)	(295)	(295)	(295)	
Old Langwith		HE likely to list so not available																																	
Old Physics		Requires relocation first																																	
Vanbrugh		HE likely to list so not available																																	
VC House		Still Current - college to be decided																																	
New Build DBFO (College 13), Eastern end of Campus East		76-83 Might be built ahead of 12																																	
New Build DBFO (College 14), Eastern end of Campus East, to South of Lake		149-154																																	
New Build DBFO (College 15) Middle of Campus East to South of Lake		126-137																																	
New Build DBFO (College 16) Middle of Campus East to South of Lake		100-121																																	
B Total Supply			-	6,100	6,100	6,100	6,300	6,605	6,605	7,405	7,705	8,355	8,355	8,110	8,110	8,110	8,510	8,510	8,510	8,510	8,510	8,510	8,510	8,510	8,510	8,510	8,510	8,760	8,760	8,760	8,760	8,760	8,760		
Difference between potential demand from students and supply			(1,857)	(1,897)	(1,937)	(1,777)	(1,513)	(1,553)	(794)	(535)	74	32	(254)	(296)	(338)	20	(23)	(66)	(108)	98	55	12	(32)	(76)											
A - B Variance		(denotes supply < demand) denotes supply > demand	(1,857)	(1,897)	(1,937)	(1,777)	(1,513)	(1,553)	(794)	(535)	74	32	(254)	(296)	(338)	20	(23)	(66)	(108)	98	55	12	(32)	(76)											
ACADEMIC SPACE TO SUPPORT GROWTH																																			
Additional total student numbers			-	86	173	259	347	435	523	612	701	790	880	971	1,062	1,153	1,245	1,337	1,430	1,523	1,617	1,711	1,806	1,901											
Additional space required for staff to support increase in Student Numbers (NIA meters squared)			-	84	168	253	339	424	510	597	684	771	859	948	1,036	1,126	1,215	1,305	1,396	1,487	1,578	1,670	1,762	1,855											
Additional teaching space required for increase in Student Numbers (NIA meters squared)			-	175	351	527	705	883	1,063	1,243	1,424	1,606	1,789	1,973	2,157	2,343	2,530	2,717	2,906	3,095	3,286	3,477	3,669	3,862											
Additional space for central support (Library and central support services)			-	470	942	1,417	1,894	2,374	2,855	3,340	3,826	4,316	4,807	5,301	5,798	6,297	6,798	7,302	7,809	8,318	8,829	9,343	9,860	10,379											
Additional space for catering			-	25	50	75	101	126	152	178	204	230	256	282	308	335	362	388	415	442	470	497	524	552											
Additional space for commercial/retail			-	57	115	173	231	289	348	407	467	526	586	646	707	768	829	890	952	1,014	1,077	1,139	1,202	1,266											
Additional research space not offices			-	96	192	289	387	485	583	682	782	881	982	1,083	1,184	1,286	1,389	1,492	1,595	1,699	1,803	1,908	2,014	2,120											
Additional Lab space not research			-	25	50	75	101	126	152	178	204	230	256	282	308	335	362	388	415	442	470	497	524	552											
Total Space Needed (NIA meters Squared)				932	1,869	2,811	3,757	4,708	5,664	6,624	7,590	8,560	9,535	10,515	11,499																				

SCENARIO 2 - PUBLIC INFORMATION
Student Accommodation Supply Demand Plan

1.01 Growth p.a

Student Bed College/Scheme	Blocks	Masterplan Comment	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	AVE	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39			
DEMAND			Historic Growth									Growth @ 1.01 p.a.																								
Total Students			12,710	13,845	14,605	14,790	15,155	15,290	15,395	16,475	104	17,213	17,385	17,559	17,735	17,912	18,091	18,272	18,455	18,639	18,826	19,014	19,204	19,396	19,590	19,786	19,984	20,184	20,385	20,589	20,795	21,003	21,213	4,000		
	Growth Index year on year		100	109	105	101	102	101	101	107	104																									
	Cumulative Growth Index		100	109	115	116	119	120	121	130	104																									
Intake Only		All new students on campus										7,470	7,545	7,620	7,696	7,773	7,851	7,930	8,009	8,089	8,170	8,252	8,334	8,417	8,502	8,587	8,672	8,759	8,847	8,935	9,025	9,115	9,206			
Returning Students												9,743	9,840	9,939	10,038	10,139	10,240	10,342	10,446	10,550	10,656	10,762	10,870	10,979	11,088	11,199	11,311	11,424	11,539	11,654	11,771	11,888	12,007			
New UGH												4,023	4,063	4,104	4,145	4,186	4,228	4,270	4,313	4,356	4,400	4,444	4,488	4,533	4,579	4,624	4,671	4,717	4,764	4,812	4,860	4,909	4,958			
New UGO												368	372	375	379	383	387	391	395	398	402	407	411	415	419	423	427	432	436	440	445	449	454			
Total New UG on Campus												3,908	3,947	3,987	4,027	4,067	4,108	4,149	4,190	4,232	4,274	4,317	4,360	4,404	4,448	4,492	4,537	4,583	4,629	4,675	4,722	4,769	4,816			
Total other types Home												2,302	2,325	2,348	2,372	2,395	2,419	2,444	2,468	2,493	2,518	2,543	2,568	2,594	2,620	2,646	2,673	2,699	2,726	2,754	2,781	2,809	2,837			
Total other types Overseas												1,913	1,932	1,951	1,971	1,991	2,011	2,031	2,051	2,072	2,092	2,113	2,134	2,156	2,177	2,199	2,221	2,243	2,266	2,288	2,311	2,334	2,358			
Returning Home UGs												8,019	8,099	8,180	8,262	8,345	8,428	8,512	8,597	8,683	8,770	8,858	8,947	9,036	9,126	9,218	9,310	9,403	9,497	9,592	9,688	9,785	9,883			
Returning Overseas UGs												588	594	600	606	612	618	624	630	637	643	650	656	663	669	676	683	689	696	703	710	717	725			
A Total Potential student residents												7,957	8,037	8,117	8,199	8,280	8,363	8,447	8,531	8,617	8,703	8,790	8,878	8,967	9,056	9,147	9,238	9,331	9,424	9,518	9,613	9,710	9,807			
SUPPLY																																				
On Campus -existing												5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700		
Noms - Student Castle		Until 2021										400	400	400																						
Other Noms?		?																																		
New Build DBFO (College 10), Western end of Campus East		Opens September 2020													600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600		
New Build DBFO (College 11), Western end of Campus East		Opens September 2021 at latest													600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	
New Build Campus West		Equivalent of one College (12) but requires demolition and appropriate funding model as bit by bit development might not be fundable by DBFO																																		
Derwent		Still Current add to Derwent College																																		
Goodricke Peninsula		Still Current, add to James College																																		
Old Langwith		HE likely to list so not available																																		
Old Physics		Requires relocation first																																		
Vanbrugh		HE likely to list so not available																																		
VC House		Still Current - college to be decided																																		
New Build DBFO (College 13), Eastern end of Campus East 76-83		Might be built ahead of 12																																		
New Build DBFO (College 14), Eastern end of Campus East 149-154																																				
New Build DBFO (College 15) Middle of Campus East to Sc 126-137																																				
New Build DBFO (College 16) Middle of Campus East to Sc 100-121																																				
B Total Supply												-	6,100	6,100	6,100	6,300	6,605	6,605	7,405	7,705	8,355	8,355	9,110	9,110	9,110	9,510	9,510	9,510	9,510	9,760	9,760	9,760	9,760	9,760		
Difference between potential demand from students and supply		(denotes supply < demand)																																		
A - B Variance		(denotes supply > demand)																																		
ACADEMIC SPACE TO SUPPORT GROWTH																																				
Additional total student numbers												-	172	346	522	699	878	1,059	1,242	1,426	1,613	1,801	1,991	2,183	2,377	2,573	2,771	2,971	3,172	3,376	3,582	3,790	4,000			
Additional space required for staff to support increase in Student Numbers (NIA meters squared)												-	168	338	509	682	857	1,034	1,212	1,392	1,574	1,758	1,943	2,131	2,320	2,511	2,705	2,900	3,097	3,296	3,497	3,700	3,905			
Additional teaching space required for increase in Student Numbers (NIA meters squared)												-	350	703	1,060	1,420	1,784	2,152	2,523	2,898	3,277	3,660	4,046	4,436	4,831	5,229	5,631	6,037	6,447	6,861	7,280	7,702	8,129			
Additional space for central support (Library and central support services)												-	940	1,889	2,848	3,817	4,795	5,783	6,781	7,789	8,806	9,834	10,873	11,922	12,981	14,051	15,131	16,222	17,325	18,438	19,562	20,698	21,845			
Additional space for catering												-	50	101	152	203	255	308	361	414	468	523	578	634	690	747	805	863	922	981	1,041	1,101	1,162			
Additional space for commercial/retail												-	115	230	347	465	585	705	827	950	1,074	1,199	1,326	1,454	1,583	1,713	1,845	1,978	2,112	2,248	2,385	2,524	2,663			
Additional research space not offices												-	192	386	582	780	979	1,181	1,385	1,591	1,799	2,009	2,221	2,435	2,651	2,870	3,091	3,314	3,539	3,766	3,996	4,228	4,462			
Additional Lab space not research												-	50	101	152	203	255	308	361	414	468	523	578	634	690	747	805	863	922	981	1,041	1,101	1,162			
Total Space Needed (NIA meters Squared)													1,864	3,748	5,649	7,570	9,510	11,470	13,449	15,448	17,467	19,506	21,566	23,646	25,747	27,868	30,012	32,176	34,362	36,570	38,800	41,053	43,328			
Total Space Needed (GIA meters Squared @ Net to gross of 85%)																																			50,974	

12.7 m2/per st

SCENARIO 3 - PUBLIC INFORMATION
Student Accommodation Supply Demand Plan

1.0125 p.a

Student Bed College/Scheme	Blocks	Masterplan Comment	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	AVE	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39			
DEMAND			Historic Growth										Growth @ 1.0125 p.a.																							
Total Students			12,710	13,845	14,605	14,790	15,155	15,290	15,395	16,475	104	17,213	17,428	17,646	17,867	18,090	18,316	18,545	18,777	19,012	19,249	19,490	19,733	19,980	20,230	20,483	20,739	20,998	21,260	21,526	21,795	22,068	22,344	5,131		
		Growth Index year on year	100	109	105	101	102	101	101	107	104																									
		Cumulative Growth Index	100	109	115	116	119	120	121	130	104																									
Intake Only		All new students on campus	7,470	7,563	7,658	7,754	7,851	7,949	8,048	8,149		7,470	7,563	7,658	7,754	7,851	7,949	8,048	8,149	8,251	8,354	8,458	8,564	8,671	8,779	8,889	9,000	9,113	9,226	9,342	9,459	9,577	9,697			
Returning Students			9,743	9,865	9,988	10,113	10,239	10,367	10,497	10,628		9,743	9,865	9,988	10,113	10,239	10,367	10,497	10,628	10,761	10,896	11,032	11,170	11,309	11,451	11,594	11,739	11,885	12,034	12,184	12,337	12,491	12,647			
New UGH			4,023	4,073	4,124	4,176	4,228	4,281	4,334	4,388		4,023	4,073	4,124	4,176	4,228	4,281	4,334	4,388	4,443	4,499	4,555	4,612	4,670	4,728	4,787	4,847	4,908	4,969	5,031	5,094	5,158	5,222			
New UGO			368	373	377	382	387	392	396	401		368	373	377	382	387	392	396	401	406	412	417	422	427	432	438	443	449	455	460	466	472	478			
Total New UG on Campus			3,908	3,957	4,007	4,057	4,107	4,159	4,211	4,263		3,908	3,957	4,007	4,057	4,107	4,159	4,211	4,263	4,317	4,371	4,425	4,481	4,537	4,593	4,651	4,709	4,768	4,827	4,888	4,949	5,011	5,073			
Total other types Home			2,302	2,331	2,360	2,389	2,419	2,450	2,480	2,511		2,302	2,331	2,360	2,389	2,419	2,450	2,480	2,511	2,543	2,574	2,606	2,639	2,672	2,705	2,739	2,774	2,808	2,843	2,879	2,915	2,951	2,988			
Total other types Overseas			1,913	1,937	1,961	1,986	2,010	2,036	2,061	2,087		1,913	1,937	1,961	1,986	2,010	2,036	2,061	2,087	2,113	2,139	2,166	2,193	2,221	2,248	2,276	2,305	2,334	2,363	2,392	2,422	2,453	2,483			
Returning Home UGs			8,019	8,119	8,221	8,323	8,428	8,533	8,640	8,748		8,019	8,119	8,221	8,323	8,428	8,533	8,640	8,748	8,857	8,968	9,080	9,193	9,308	9,424	9,542	9,662	9,782	9,905	10,028	10,154	10,281	10,409			
Returning Overseas UGs			588	595	603	610	618	626	634	641		588	595	603	610	618	626	634	641	649	658	666	674	683	691	700	708	717	726	735	745	754	763			
A Total Potential student residents			7,957	8,057	8,158	8,260	8,363	8,467	8,573	8,680		7,957	8,057	8,158	8,260	8,363	8,467	8,573	8,680	8,789	8,899	9,010	9,123	9,237	9,352	9,469	9,587	9,707	9,828	9,951	10,076	10,202	10,329			
SUPPLY																																				
On Campus -existing			5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700		5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700		
Noms - Student Castle		Until 2021	400	400	400							400	400	400																						
Other Noms?		?																																		
New Build DBFO (College 10), Western end of Campus East		Opens September 2020						600	600	600																										
New Build DBFO (College 11), Western end of Campus East		Opens September 2021 at latest						600	600	600																										
New Build Campus West		Equivalent of one College (12) but requires demolition and appropriate funding model as bit by bit development might not be fundable by DBFO																																		
Derwent		Still Current add to Derwent College																				(245)	(245)	(245)	(245)	(245)	(245)	(245)	(245)	(245)	(245)	(245)	(245)	(245)	(245)	
Goodricke Peninsula		Still Current, add to James College						(295)	(295)	(295)												(295)	(295)	(295)	(295)	(295)	(295)	(295)	(295)	(295)	(295)	(295)	(295)	(295)	(295)	(295)
Old Langwith		HE likely to list so not available																																		
Old Physics		Requires relocation first																																		
Vanbrugh		HE likely to list so not available																																		
VC House		Still Current - college to be decided																																		
New Build DBFO (College 13), Eastern end of Campus East	76-83	Might be built ahead of 12																800	800	800	800	800	800	800	800	800	800	800	800	800	800	800	800	800	800	
New Build DBFO (College 14), Eastern end of Campus East, to South of Lake	149-154																																			
New Build DBFO (College 15) Middle of Campus East to South of Lake	126-137																																			
New Build DBFO (College 16) Middle of Campus East to South of Lake	100-121																																			
B Total Supply			-	6,100	6,100	6,100	6,300	6,605	6,605	7,405		-	6,100	6,100	6,100	6,300	6,605	6,605	7,405	7,705	8,355	8,355	9,110	9,110	9,110	10,510	10,510	10,510	10,510	10,760	10,760	10,760	10,760	10,760		
Difference between potential demand from students and supply		(denotes supply < demand)	(1,857)	(1,957)	(2,058)	(1,960)	(1,758)	(1,862)	(1,168)	(975)		(1,857)	(1,957)	(2,058)	(1,960)	(1,758)	(1,862)	(1,168)	(975)	(434)	(544)	100	(13)	(127)	1,158	1,041	923	803	932	809	684	558	431			
A - B Variance		(denotes supply > demand)	(1,857)	(1,957)	(2,058)	(1,960)	(1,758)	(1,862)	(1,168)	(975)		(1,857)	(1,957)	(2,058)	(1,960)	(1,758)	(1,862)	(1,168)	(975)	(434)	(544)	100	(13)	(127)	1,158	1,041	923	803	932	809	684	558	431			
ACADEMIC SPACE TO SUPPORT GROWTH																																				
Additional total student numbers			-	215	433	654	877	1,103	1,332	1,564		-	215	433	654	877	1,103	1,332	1,564	1,799	2,036	2,277	2,520	2,767	3,017	3,270	3,526	3,785	4,047	4,313	4,582	4,855	5,131			
Additional space required for staff to support increase in Student Numbers (NIA meters squared)			-	210	423	638	856	1,077	1,300	1,526		-	210	423	638	856	1,077	1,300	1,526	1,756	1,988	2,222	2,460	2,701	2,945	3,192	3,442	3,695	3,951	4,210	4,473	4,739	5,008			
Additional teaching space required for increase in Student Numbers (NIA meters squared)			-	437	880	1,328	1,782	2,242	2,707	3,178		-	437	880	1,328	1,782	2,242	2,707	3,178	3,655	4,138	4,627	5,122	5,623	6,131	6,645	7,165	7,692	8,225	8,765	9,312	9,866	10,426			
Additional space for central support (Library and central support services)			-	1,175	2,365	3,569	4,789	6,024	7,274	8,540		-	1,175	2,365	3,569	4,789	6,024	7,274	8,540	9,822	11,119	12,433	13,764	15,111	16,475	17,856	19,254	20,670	22,103	23,554	25,024	26,511	28,018			
Additional space for catering			-	62	126	190	255	320	387	454		-	62	126	190	255	320	387	454	522	591	661	732	804	876	950	1,024	1,099	1,176	1,253	1,331	1,410	1,490			
Additional space for commercial/retail			-	143	288	435	584	734	887	1,041		-	143	288	435	584	734	887	1,041	1,198	1,356	1,516	1,678	1,842	2,009	2,177	2,348	2,520	2,695	2,872	3,051	3,232	3,416			
Additional research space not offices			-	240	483																															

SCENARIO 6 - PUBLIC INFORMATION

1.04 p.a

Student Accommodation Supply Demand Plan - Assume no growth after 2021

Student Bed College/Scheme	Blocks	Masterplan Comment	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	AVE	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39			
DEMAND			Historic Growth										Growth @ 1.04 p.a.																							
Total Students			12,710	13,845	14,605	14,790	15,155	15,290	15,395	16,475		17,213	17,902	18,618	19,362	20,137	20,942	21,780	22,651	23,557	24,499	25,479	26,499	27,559	28,661	29,807	31,000	32,240	33,529	34,870	36,265	37,716	39,224	22,011		
		Growth Index year on year	100	109	105	101	102	101	101	107	104																									
		Cumulative Growth Index	100	109	115	116	119	120	121	130	104																									
Intake Only		All new students on campus										7,470	7,769	8,080	8,403	8,739	9,088	9,452	9,830	10,223	10,632	11,057	11,500	11,960	12,438	12,936	13,453	13,991	14,551	15,133	15,738	16,368	17,022			
Returning Students												9,743	10,133	10,538	10,960	11,398	11,854	12,328	12,821	13,334	13,867	14,422	14,999	15,599	16,223	16,872	17,547	18,248	18,978	19,738	20,527	21,348	22,202			
New UGH												4,023	4,184	4,351	4,525	4,706	4,895	5,090	5,294	5,506	5,726	5,955	6,193	6,441	6,699	6,967	7,245	7,535	7,836	8,150	8,476	8,815	9,167			
New UGO												368	383	398	414	431	448	466	484	504	524	545	567	589	613	637	663	689	717	746	775	806	839			
Total New UG on Campus												3,908	4,065	4,227	4,396	4,572	4,755	4,945	5,143	5,349	5,563	5,785	6,017	6,257	6,508	6,768	7,039	7,320	7,613	7,917	8,234	8,563	8,906			
Total other types Home												2,302	2,394	2,490	2,589	2,693	2,801	2,913	3,029	3,150	3,276	3,408	3,544	3,686	3,833	3,986	4,146	4,312	4,484	4,663	4,850	5,044	5,246			
Total other types Overseas												1,913	1,990	2,069	2,152	2,238	2,327	2,421	2,517	2,618	2,723	2,832	2,945	3,063	3,185	3,313	3,445	3,583	3,726	3,875	4,030	4,192	4,359			
Returning Home UGs												8,019	8,340	8,673	9,020	9,381	9,756	10,147	10,552	10,975	11,414	11,870	12,345	12,839	13,352	13,886	14,442	15,019	15,620	16,245	16,895	17,571	18,273			
Returning Overseas UGs												588	612	636	661	688	715	744	774	805	837	870	905	941	979	1,018	1,059	1,101	1,145	1,191	1,239	1,288	1,340			
A Total Potential student residents												7,957	8,276	8,607	8,951	9,309	9,681	10,069	10,471	10,890	11,326	11,779	12,250	12,740	13,250	13,780	14,331	14,904	15,500	16,120	16,765	17,436	18,133			
SUPPLY																																				
On Campus -existing												5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700	5,700		
Noms - Student Castle		Until 2021										400	400	400																						
Other Noms?		?																																		
New Build DBFO (College 10), Western end of Campus East		Opens September 2020													600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600		
New Build DBFO (College 11), Western end of Campus East		Opens September 2021 at latest														600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	600	
New Build Campus West		Equivalent of one College (12) but requires demolition and appropriate funding model as bit by bit development might not be fundable by DBFO																																		
Derwent		Still Current add to Derwent College																																		
Goodricke Peninsula		Still Current, add to James College																																		
Old Langwith		HE likely to list so not available																																		
Old Physics		Requires relocation first																																		
Vanbrugh		HE likely to list so not available																																		
VC House		Still Current - college to be decided																																		
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New Build DBFO (College 16) Middle of Campus East to South of Lake	100-121																																			
B Total Supply																																				
Difference between potential demand from students and supply																																				
		(denotes supply < demand)																																		
A - B Variance		(denotes supply > demand)																																		
ACADEMIC SPACE TO SUPPORT GROWTH																																				
Additional total student numbers																																				
Additional space required for staff to support increase in Student Numbers (NIA meters squared)																																				
Additional teaching space required for increase in Student Numbers (NIA meters squared)																																				
Additional space for central support (Library and central support services)																																				
Additional space for catering																																				
Additional space for commercial/retail																																				
Additional research space not offices																																				
Additional Lab space not research																																				
Total Space Needed (NIA meters Squared)																																				
Total Space Needed (GIA meters Squared @ Net to gross of 85%)																																				

STAFF ESTABLISHMENT 28 Feb 2018

Faculty	Department	Academic	Post type not recognised	Research	Support	Teaching	Grand Total
	Biorenewables Development Centre (UoY)					24	24
	International Pathway College					4	41
	Norwegian Study Centre					2	5
Faculty of Arts and Humanities		2				1	3
Faculty of Arts and Humanities	Archaeology	24		23		30	8
Faculty of Arts and Humanities	English and Related Literature	42		4		10	10
Faculty of Arts and Humanities	History	52		10		13	75
Faculty of Arts and Humanities	History of Art	17				11	1
Faculty of Arts and Humanities	Language and Linguistic Science	22		13		9	44
Faculty of Arts and Humanities	Music	18				8	4
Faculty of Arts and Humanities	Philosophy	21				7	8
Faculty of Arts and Humanities	Theatre, Film and Television	23		5		24	10
Faculty of Sciences		2				3	5
Faculty of Sciences	Biology	60		104		151	14
Faculty of Sciences	Chemistry	49		86		90	10
Faculty of Sciences	Computer Science	41		33		50	14
Faculty of Sciences	Electronic Engineering	25		24		27	19
Faculty of Sciences	Environment	32		40		25	6
Faculty of Sciences	Health Sciences	31		89		114	51
Faculty of Sciences	Hull York Medical School	28		1		21	2
Faculty of Sciences	Mathematics	48		18		9	1
Faculty of Sciences	Physics	53		44		48	3
Faculty of Sciences	Psychology	36		22		32	12
Faculty of Social Sciences		2				2	4
Faculty of Social Sciences	Centre for Health Economics	13		49		17	79
Faculty of Social Sciences	Centre for Reviews and Dissemination	3		25		12	40
Faculty of Social Sciences	Economics	41		5		16	7
Faculty of Social Sciences	Education	28		9		24	20
Faculty of Social Sciences	Institute for Effective Education			1			1
Faculty of Social Sciences	Politics	39		7		24	16
Faculty of Social Sciences	Social Policy and Social Work	31		25		28	18
Faculty of Social Sciences	Sociology	29		10		10	3
Faculty of Social Sciences	The York Law School	20		1		7	24
Faculty of Social Sciences	The York Management School	49		4		24	20
University Support Services	Estates and Campus Services					531	531
University Support Services	External Relations					175	20
University Support Services	Finance					76	76
University Support Services	Human Resources					69	69
University Support Services	Information Services					254	254
University Support Services	Registrar's and Planning					64	64
University Support Services	Research and Enterprise					87	87
University Support Services	Student and Academic Services					202	9
University Support Services	Vice Chancellor's Department	21		1		12	34
Grand Total	Total	872	1	646	2,335	395	4,215
		10		10	30	8	10
	Current Apply Space Model - Offices	8,720	10	19,380	18,680	3,950	50,740 sq m
	Growth	pro rata	Pro rata	Pro rata	20% Pro rata		

University of York

STUDENT Nos

FTE Nos	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	
PGR	1,025	1,070	1,095	1,160	1,195	1,280	1,300	1,310	
PGT	1,985	2,230	2,275	2,275	2,300	2,240	2,005	2,625	
UG	9,700	10,545	11,235	11,355	11,660	11,770	12,090	12,540	
	12,710	13,845	14,605	14,790	15,155	15,290	15,395	16,475	3,765

Growth year to year index	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	AVERAGE
INDEX PGR	100	104	102	106	103	107	102	101	104
INDEX PGT	100	112	102	100	101	97	90	131	105
INDEX UG	100	109	107	101	103	101	103	104	104
	100	109	105	101	102	101	101	107	104

Cumulative Index	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	
INDEX PGR	100	104	107	113	117	125	127	128	104 Grown by 28% in 7 years
INDEX PGT	100	112	115	115	116	113	101	132	105 Grown by 32% in 7 years
INDEX UG	100	109	116	117	120	121	125	129	104 Grown by 29% in 7 years
	100	109	115	116	119	120	121	130	Grown by 30% in 7 years

Economic Benefits from the Expansion of the University of York

April 2018



**NICOL
ECONOMICS**

Report prepared for the
University of York

April 2018

by Nicol Economics
www.nicol-economics.co.uk

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1. Introduction

- 1.1 In March 2018, Nicol Economics was instructed by the University of York to prepare an assessment of the economic implications of the proposed policy towards the expansion of the University in the draft Local Plan¹. The author of this report is Stephen Nicol, director of Nicol Economics, who has over 30 years' experience in the field of economic development and the assessment of economic and social impact.
- 1.2 The draft Local Plan supports the continued expansion of the University and recognises that it is likely to run out of space in the next decade. However, the specific proposed allocation to support the expansion of the University is insufficient to allow for the University's future growth needs. This will have economic implications for York that are explored in this report.

Proposed Local Plan allocation for the future growth of the University

- 1.3 Under Policy EC1, which provides for employment allocations, the draft Local Plan proposes a 21.5 hectare allocation specifically for the University in "**ST27: University of York Expansion**".
- 1.4 The policy states that within this allocation of 21.5 hectares that "*ST27 must create an appropriately landscaped buffer ... between development and the A64 in order to mitigate heritage impacts in terms of the historic character and setting of the city and to maintain key views*". This is expanded on in para 7.9, that states: "*to mitigate any impacts on the historic character and setting of the city the expansion site must create an appropriately landscaped buffer between the site development and the A64. This will be established through the masterplanning of the site*".
- 1.5 The explanatory text states:
*"The University of York retains a high profile in both the UK and in the rest of the world. The university's status is reflected in the high demand for student places at the university and it is currently projected that growth in student numbers will continue over the duration of the plan up to 2032. Without the campus extension, the **university will not be able to continue to grow beyond 2023**. As one of the leading higher education institutions, the university needs to continue to facilitate growth, within the context of its landscaped setting which gives it a special character and quality, to guarantee its future contribution to the need for higher education and research and to the local, regional and national economies. The 21.5ha of land at ST27 is allocated for university uses to support this growth."* [para 7.8 our emphasis added].
- 1.6 The allocation ST27 also notes that "*Campus East and ST27 will across both sites deliver up to 25ha of B1b knowledge based businesses including research led science park uses identified in the existing planning permission for Campus East*".

Implication of the current proposed policies for the University of York

- 1.7 The University requires a larger allocation for its future expansion based on the experience to date of the rate of development on the 65 hectare Campus East allocation. The proposed allocation, because of its requirement to have an extensive landscape buffer, only provides an effective net developable area of **13 hectares**.

¹ Local Plan - Publication Draft, February 2018

- 1.8 The most recent masterplanning exercise conducted by Make Architects for the University sets out the potential accommodation schedule for the University’s preferred allocation of 26 hectares and also an accommodation schedule for the proposed allocation ST27 (taking account of the requirement of a landscape buffer). As can be seen in Table 1.1, in effect the current allocation ST27 provides **for less than 50% of the expansion space** (almost 90,000 sqm GIA floorspace less) than the University’s needs embodied by its proposals.

Table 1.1: Space implications for future University expansion of draft Local Plan allocation ST27, GIA sqm						
Type of Use	Potential development schedule based on:					Draft Local Plan space compared to University proposals
	Current Local Plan allocation ST27		University's proposals		Difference	
Residential	26,600	37.7%	81,100	51.3%	54,500	33%
Social/hub	3,000	4.3%	14,400	9.1%	11,400	21%
Academic	16,050	22.7%	31,750	20.1%	15,700	51%
Business/ collaboration	19,300	27.4%	23,900	15.1%	4,600	81%
MSP	5,600	7.9%	7,000	4.4%	1,400	80%
Total	70,550	100%	158,150	100%	87,600	45%
Total building footprints (GIA)	25,800		50,200		24,400	
Gross allocation (has)	21.5 ha		26.0 ha		4.5 ha	
Net developable area (has)	13.0 ha		26.0 ha		13.0 ha	

Source: University of York: Campus East extension: extension options, 13th March 2018, Make Architects

- 1.9 To put these figures into context, the current Campus East Development area has an overall building footprint/infrastructure footprint capacity of some 150,000 sqm (15.0 hectares). The proposed Local Plan allocation would therefore amount to an extra 17% in development capacity over and above the current Campus East permission and the University’s proposed allocation a 33% increase (see Table 1.2).

Table 1.2: Space implications of new site allocations for the University		
Development area	Total footprint sqm	Increase on current Campus East permission
Current Campus East capacity	150,115	
Local Plan allocation ST27	25,800	17%
University proposal	50,200	33%

Experience of the Campus East extension to date

- 1.10 The current Campus East Development area, which has catered for the expansion of the University over the past decade, was granted Outline Planning Permission in June 2007. The total site area is 116 hectares of which 65 hectares is developable. Overall, 35 hectares of the Campus East Development area has been built out over the 10 years between 2008 and 2017 out of the total developable area of 65 hectares.
- 1.11 The total allowable development footprint is 14.95 ha (23% of the 65 hectares allocation). As of September 2017, planning permissions had been granted for approved developments that occupied a 71,430 sqm footprint (7.14 hectares); this therefore amounts to 48% of the 14.95 ha area available for development.

- 1.12 The City of York Council (CoYC) has accepted in the current draft of the Local Plan that the University is likely to use up completely the Campus East development area with university buildings by 2023. This would represent a development rate of just over 4 hectares per year (9,400 sqm pa of building footprint)². This date is only five years away and therefore four years after the point when the Local Plan is likely to be adopted.

Business related space on the Campus East extension

- 1.13 Part of the thinking in providing for a 65 hectare campus extension for the University was to create an area to encourage the development of business space for firms that wanted or needed to be close to the University. The outline planning permission in 2007 allows for the extension to house “up to 25ha of associated employment uses” such as “incubators, genesis units and related research institutes”. Condition 5³ attached to the planning approval restricted such uses to “knowledge based activities, including Science City York Uses, that can demonstrate that they need to be located on the site due to aspects such as sharing of research and development ideas, resources or personnel, or undertaking of research activities within the University of York”. It further defined relevant uses as those which:

- “(i) which operate within a high technology sector and/or engage in innovative activities; and
- (ii) which have a focus on research and development, product or process design, applications engineering, high level technical support or consultancy; and
- (iii) where a minimum of 15% of the staff employed are qualified scientists or engineers. (Qualified scientists or engineers are those qualified to at least graduate level in physical, biological, social sciences or humanities disciplines related to the work of Science City York”⁴).

- 1.14 In practice there has been relatively little development of such associated employment uses to date. The main development has been the 2,700 sqm (30,000 sq. ft) Catalyst building completed in 2011 which was part funded by European Union development funds, owned and operated by the Science Park and which is now effectively fully occupied. The 650 sqm Ron Cooke Hub also provides for interaction space between academics and businesses. In addition, the Law & Management, Computer Science and Theatre, Film and Television buildings are mainly used for academic purposes but have some space allocated to knowledge exchange (ranging from 11% to 18%).

- 1.15 This relatively slow rate of development is a result of two main factors:
- First, the access to the site by car is relatedly difficult because of a deliberate policy to reduce car usage into and on the Campus Extension. The experience of the University and the Science Park is that most occupiers seek car access to their facilities.

² Assuming development is over the 16 years 2008 to 2023

³ As set out in the 2007 Inspector’s report

⁴ Science City York (SCY) has changed its role and focus since 2007 when the Inspector’s report was written and now focuses on supporting business networking in bioscience, creative and I.T. & digital (it is subsumed into Make It York the city’s inward investment and destination management organisation)

- Second, the work started on the Campus East extension at the start of the last recession and, not surprisingly, there was little private sector development activity.
- 1.16 However, there have been several “near misses” in recent years where large scale opportunities linked to the University for businesses and other organisations linked to the University to locate on Campus East⁵. These serious enquiries demonstrate the benefits of having a site that is suitable to attract knowledge based inward investment (as well as growth space for existing York-based businesses).
- 1.17 The draft Local Plan states that “ST27 will be accessed from Hull Road via Campus East. In addition, the development should exploit any shared infrastructure opportunities arising from the proximity of the housing allocation at ST15: Land to the west of Elvington Lane to the University of York” (para 7.11). ST15 provides for the development of a “new sustainable garden village for York” (of approximately 3,300 dwellings). This development will require a new access to the A64 which could, as the draft Local Plan suggests, potentially be shared with the University expansion site. This would significantly improve the access of this location for businesses and the attractiveness of it as a location of science and technology based businesses wanting proximity to the University combined with good transport access.

2. Policy support for the University

- 2.1 The University of York is rightly regarded as one of the jewels in the crown of the elements that have and will make York a successful economy and place to live. This recognition and policy support is round in several documents, in particular the:
- York Economic Strategy 2016 - 2020 (launched in July 2016)
 - Current draft Local Plan itself
 - Local Enterprise Partnership (LEP) strategies.

York Economic Strategy 2016 to 2020

- 2.2 This document prepared by CoYC recognises that York is in many respects a successful economy, but that it has some underlying challenges. It sets out two different scenarios of growth (broadly over a 15 year period to 2030):
- Scenario 1: “**Keep Going, We’re Doing Fine...**” this scenario is one of “business as usual”, but where the challenges continue. In respect of the University it states: “*while the growth in student accommodation has continued to abound both on and off campus, University and research-led job creation never materialised without the business space to accommodate it*”.
 - Scenario 2: “**Choosing A Better Story**” this scenario is described as one where “*York is recognised as the intellectual hub of the Northern Powerhouse, the place to do business for a number of distinctive industries which rely on the local high quality skills base*”.

⁵ As set out in University Growth Rationale, Stephen Talboys, University of York’s Director of Estates and Campus, March 2018

2.3 The strategy identifies 8 areas for action that are needed to help achieve Scenario 2:

- 1) Deliver York central enterprise zone and a high speed hub
- 2) Deliver a local plan that supports a high value economy
- 3) Take practical steps to develop and retain talent in the city
- 4) Drive real university & research-led business growth in key sectors
- 5) Lobby for investment in key transport networks
- 6) Use local business rate freedoms to drive high value growth
- 7) Make a fresh loud statement of cultural and visual identity
- 8) Bring people and businesses together in creative low-cost ways.

2.4 Action Area 2, 3 and 4 are clearly linked to the continued success of the University of York:

- The document notes under Action Area 3: that *“any successful economy requires skilled people to replace those leaving the labour market. With many young people in York going on to study and make a life elsewhere, York’s **pipeline of graduate and apprenticeship talent is essential to its economic vibrancy**. London will always be a draw for many completing their studies, yet **significant numbers of York students want to stay in the City**”* [our emphasis added]. Clearly, the document is acknowledging the considerable benefits of a strong pipeline of students from York’s universities.
- Under Action Area 4 the document states that *“York Science Park has already proved the impact university and research led growth can have on a city [but that] in York there still feels much untapped potential – particularly where the City has distinct comparative advantages”*. It notes that *“through the University of York, Fera Science and others, York is already at the leading edge of many disciplines of bioeconomy and agri-tech research”*.

2.5 The Strategy also specifically identifies an action which is: *“University Campus as a High Value Innovation-Led Business Location”* where partners will market a business accommodation offer for Campus East/University expansion for developers to invest in and businesses to relocate.

Draft Local Plan February 2018

2.6 The publication draft Local Plan sets out a strategy for York to 2038. In addition to having a specific allocation (ST27), the draft Local Plan clearly acknowledges the importance of the University of York elsewhere in the document:

- Section 1: Background, in para 1.24 it describes *“York, as an internationally recognised centre of excellence for education, has two great universities and an unparalleled education system”*.
- Then in para 1.57 it notes that *“it is important that the Local Plan supports the continued success of further and higher education in the city **recognising the economic benefit it brings** whilst managing any associated issues such as student housing. For some education institutions this may mean supporting future plans for expansion to accommodate growth”* [our emphasis added].

- Para 1.58 covers specifically the University of York. It describes the decision by the Secretary of State in 2007 to allow Campus East extension based on the combination of *“the educational need for the University to expand, the considerable economic benefits to the city and the region that would be derived from the expansion of the University”*. It explains that these factors created the *“very special circumstances for the development in the draft green belt”*. The draft Local Plan recognises that *“the factors for continued growth are still relevant today and in the future”*.
- In para 1.59 the draft Local Plan notes that the *“University plays a significant role in the economic and cultural life of the city and the region”* and provides some, now slightly dated, estimates of its impact. [These are updated in Section 4 below].
- In Section 3 on the Spatial Strategy there is a specific policy (SS22) on the University of York Expansion. This describes the role of allocation ST27 as providing *“B1b employment floorspace for knowledge based businesses including research-led science park uses and other higher education and related uses”*. The explanatory text for this policy could not be clearer stating *“The University of York is a **key component of the long term success of the city** and it is important to provide a long term opportunity for the University to expand...[and that] the University proposal is a key priority in the Local Economic Plan Growth Deal that has been agreed with the government”*. (para 3.98 our emphasis added).
- In the Section 7 Education policies the draft Plan states in the context of policies ED3 on Campus East that: *“as one of the leading higher education institutions, the university needs to continue to facilitate growth, within the context of its landscaped setting which gives it a special character and quality, to guarantee its future contribution to the need for higher education and research and to the **local, regional and national economies”***. [Para 7.8, our emphasis added].

2.7 Finally, in summarising the role of the Campus East extension in para 7.12 the draft Local Plan states that the campus extension will:

- *“enable the city of York to contribute directly to the delivery of national growth strategies;*
- *enable key Local Enterprise Partnership priorities to be realised;*
- *support the York Economic Strategy (2016) and the city’s ambitions to be a global competitive city;*
- *contribute to delivering the local plan vision of supporting the delivery of sustainable economic growth; and*
- *meet a commercial need and a gap in York’s employment land supply to meet the business needs of economic growth sectors”*.

Local Enterprise Partnership (LEP) strategies

2.8 York sits currently in two LEP areas: York, North Riding and East Riding and in Leeds City Region.

[Strategic Economic Plan, York, North Yorkshire and East Riding Enterprise Partnership, 2014 and 2016 Update](#)

2.9 The Strategic Economic Plan (SEP) for this Local Enterprise Partnership sets out five priorities for the area which are:

- 1) *Profitable and ambitious small and micro businesses* (“Ambitious businesses that are supported to innovate, improve and grow”).
 - 2) *A global leader in food manufacturing, agri-tech and biorenewables* (“Driving growth by building on our international reputation in agri-tech & biorenewables”).
 - 3) *Inspired people* (“Growing businesses able to access ambitious people, with the right skills and the right attitude”).
 - 4) *Successful and distinctive places* (“Enhanced growth and opportunities in targeted locations”).
 - 5) *A well connected economy* (“Businesses with strong connections to their customers and markets”).
- 2.10 The LEP identifies the University as central to one of the key assets of the area: “*World-class research facilities*” and the “*highest level of skills of any City in the North, and world-class bioeconomy & agri-tech research facilities*”. The SEP and its update identifies six opportunities for the LEP are of which two⁶ directly relate to the University:
- Strong education system and high skill levels to support high value job creation.
 - Agri-food and biorenewables/ bioscience as distinctive sector & research strengths.
- 2.11 Under Priority 2, the LEP sets out the BioVale vision and the role of the University in it:
- “The BioVale vision is for a region wide bioeconomy based innovation cluster, including biorenewables and agrifood. The centres of expertise in the University of York are at the heart of this vision, joined together and connected to business through a new BioHub”.*
- 2.12 Under Priority 4 (successful and distinctive places) the LEP notes that the area is “*a great business location... with business innovation assets such as the Food and Environment Research Agency and University of York we are internationally competitive in key industries*”.

Leeds City Region LEP

- 2.13 York is also part of the Leeds City Region LEP area. In 2016 the Strategic Economic Plan (SEP) was updated. The SEP describes York as “*one of Leeds City Region’s major assets. It has been voted the place people most want to live in England, has a global reputation for culture and heritage, is home to a world leading and expanding university, and has the highest proportion of people with a degree education in the North*” [Our emphasis added].
- 2.14 It also notes in terms of strengths that the city “[adds to] strengths in the City Region’s financial and business services sector and its rail sector, [and that] there are excellent opportunities in the agri-tech and bioeconomy sectors, linked to major R&D assets and business growth at Sand Hutton and Heslington East.” [Heslington East is of course the University expansion area].
- 2.15 The SEP identifies six Leeds City Region sector priorities:
- 1) innovative manufacturing
 - 2) financial and professional services

⁶ The other four are: potash and energy investment with the associated supply chain opportunities; A strong business base with above average survival rates; changes in Government policy including High speed rail and One Public Estate; quality of life, digital connectivity and changing nature of work presenting greater viability for rural and coastal economy

- 3) health and life sciences
- 4) low carbon and environmental industries
- 5) digital and creative industries
- 6) food and drink.

2.16 York and the University play an important role in 3) and 4) in particular.

Conclusions

2.17 There is extremely strong policy support locally for the critical economic role played by the University in the economy of York and its sub-region and the importance of its continued expansion. The role the University plays in science and innovation across several sectors is highlighted, particularly in the biosciences, agri-tech and bio-renewables areas. The importance of its supply of high quality graduates is also highlighted. The continued expansion of Heslington East as a growth opportunity is noted.

3. Historic and forecast growth of the University

3.1 We summarise in Table 3.1 below the rate of growth of the University since it obtained planning permission for the Campus East extension in 2007. As can be seen, student numbers have increased by nearly 60% and staff numbers have risen by over 50% over this 10 year period. Overall, income has risen by 85% and staff costs by 79%. The expected growth in the University which was forecast in 2006 and 2007 when planning permission for the Campus East extension was sought has therefore fully materialised and indeed has occurred well ahead of the time period envisaged.

3.2 When the planning permission was granted the stated aims of the University (as of 2006) was that it “wants to be able to expand to about 17,450 students (15,400 FTE) over a period of 10/15 years⁷”. As can be seen from Table 3.2 below it has already exceeded this anticipated level of growth and indeed the University had reached the forecast 15,400 fte students by 2014/15 or within 8 years.

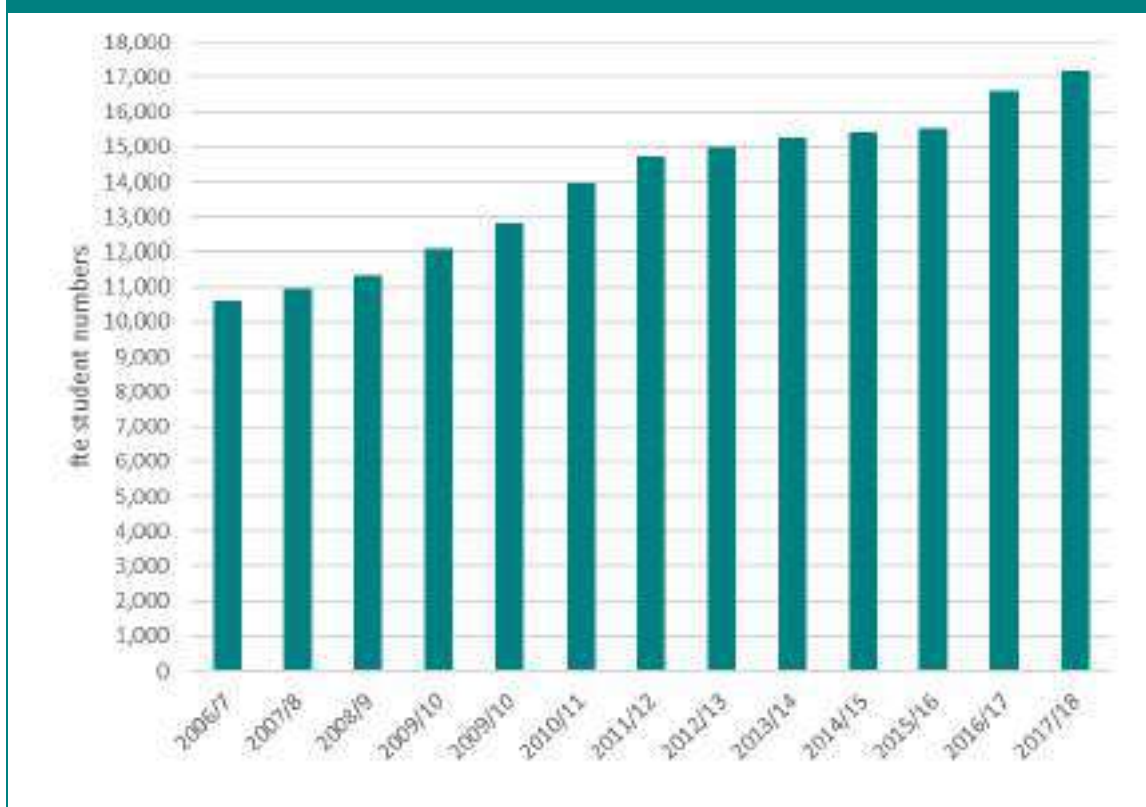
Element of the University	2006/7	2016/17	Change over period		
			Absolute	%	% pa
Total student numbers (ftes 000s)	10.6	16.6	6.0	57%	4.6%
Total staff numbers (ftes 000s)	2.8	4.2	1.4	51%	4.2%
Total staff costs £ms	£106.6	£191.2	£84.6	79%	6.0%
Total income £ms, of which	£187.1	£346.2	£159.1	85%	6.3%
Total fees £ms	£39.1	£166.1	£127.0	325%	15.6%
Total research income £ms	£97.8	£106.9	£9.1	9%	0.9%

Source: Nicol Economics analysis of Annual Reports of University of York. Note: the latest FTE figure for 2017/18 is 17,212 a further 3.7% annual growth on 2016/17

⁷ Para 69 Inspectors report into Campus East development March 2007, Land south of Field Lane, Heslington, York, Ref: APP/C2741/V/05/1189972,

- 3.3 The University have carried out an exercise looking at six potential scenarios for the growth of the University beyond 2017/18 (the base year when there are 17,200 fte student). These look at a range of average annual growth rates in fte student numbers over the period to 2038 ranging from 0.5% pa to 4.0 % pa (the rate of growth over the past decade or so). The paper by the University identifies Scenarios 3 and 4 as the “*minimum prudent scenarios for planning purposes*”, they have 1.25% pa and 1.5% pa average annual rates of growth respectively.
- 3.4 Both scenarios have rates of growth that are considerably lower than the rates experienced over the last decade. As the October 2017 reps by the University to the pre-publication Local Plan made clear: “*projecting student growth during the whole Local Plan period to 2032/33 and beyond to 2037/38 cannot be an exact science due to the range of factors which affect the totals*”. Nevertheless, the analysis above suggests that broad levels of growth expected by the University are perfectly reasonable.

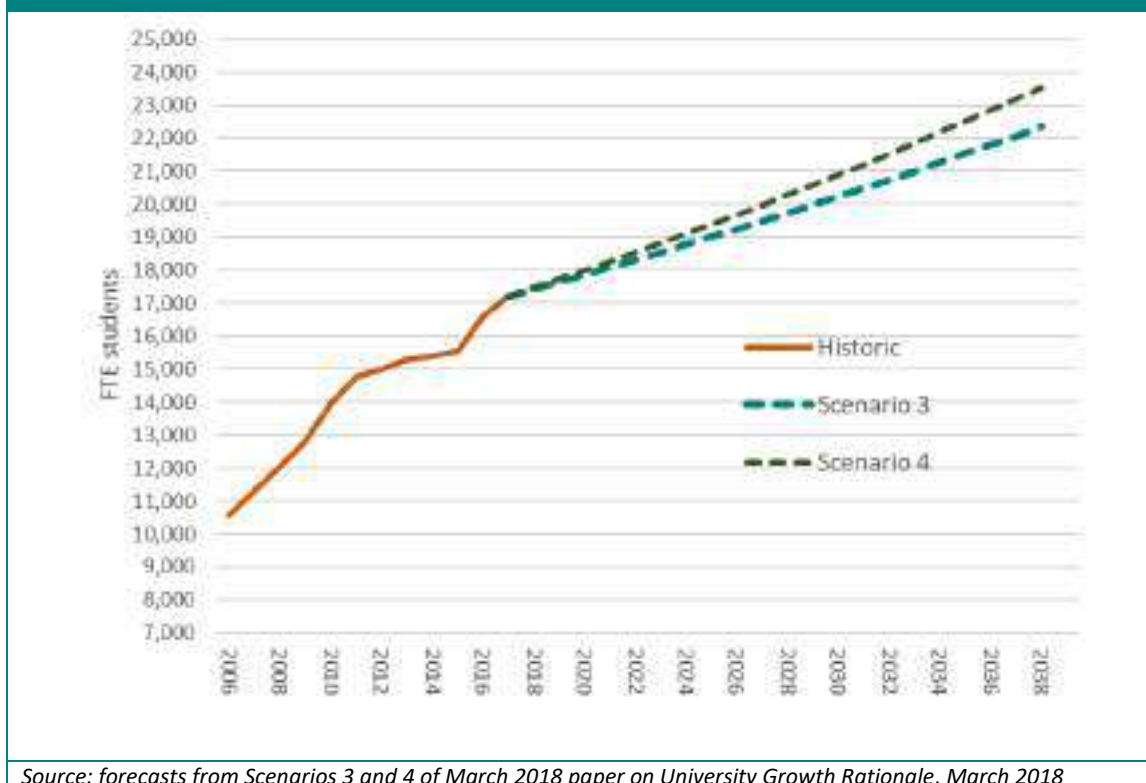
Figure 3.1: Growth in actual fte student numbers, University of York



Source: student numbers from University of York

- 3.5 We set out below the implications of these two growth scenarios. They would lead to student numbers rising to between 22,300 to 23,500 ftes by 2038 (the end of the Local Plan period) representing 5,100 to 6,300 increases on the 2017/18 levels.

Figure 3.2: Forecast growth in fte student numbers, University of York



4. Current economic role of the University

4.1 The University plays a variety of roles in the economy of York and the wider sub-region. These can be summarised as:

- 1) Its **direct economic role** as an employer of some 4,200 fte staff and the £153 million it spends on salaries for its staff.
- 2) The **indirect economic role** from the expenditure on good and services it makes with suppliers based in the local area⁸ and also from the spend by its staff who live in York.
- 3) The contribution to the local economy from **expenditure by its 17,400 students** (of whom 15,900 are full-time and with 16,600 fte students).
- 4) The **wider role** in the competitiveness of the local economy from a combination of:
 - Links with local businesses and the role it plays in the development of important sectors of the economy via the innovation eco-system
 - Spin-out and spin-off businesses from the University's researchers
 - The contribution its graduates make to the local economy when they stay in the city and add to its skills base.

⁸ According to Martin (2017) "20% of University expenditure on goods and services was attributable to local suppliers", based on a survey in 2013

- 5) The role the University and its staff and students make in the **cultural and social life** of the city: contributing to the overall liveability of York.

Economic role of the University in 2016/17: its measurable economic footprint

4.2 Dr Stephen Martin of the University of York's economics department has produced estimates of the economic impact of the University in 2016/17⁹ (and for earlier years). We draw on this work in summarising estimates of the current economic impact in the section. The scale of activity of the University of York in 2016/17 was:

- There were 4,200 fte staff employed.
- Overall expenditure of £81 million on goods and services of which roughly 20% was spent locally (that is, £16.2 million) supporting around 350 fte jobs.
- The University's 16,600 FTE students spent money off-campus in York. Dr Martin estimates that this expenditure, coupled with conference delegate spend off-campus, supported around 1,300 fte jobs.
- Therefore, the total 1st round effects from direct employment, spend with local suppliers and student spend, supported around 5,900 jobs in York.
- Subsequent multiplier effects supported a further around 600 jobs in York.
- The report also assesses the impact of the considerable construction activity at the University which has averaged at around 200 jobs over the last four years.
- So that overall in 2016/17 the activities of the University supported an estimated 6,600 fte jobs in York.
- The report also estimates that, based on previous surveys, there are a further c. 1,000 jobs in businesses located on the Science Park and that the overall contribution to employment in York from the Science Park is around 1,200 fte jobs.
- The report also shows that the contribution to local employment from the University's activities (on their own excluding the Science Park) has grown steadily in line with the growth in the size of the University, growing by around 1,700 fte jobs (35%) since 2009/10.
- Finally, the report puts these impact figures in context: in 2016/17 it estimates that the University of York and the Science Park together account for around 8% (1 in 12) of all jobs in the City of York Unitary Authority area¹⁰.

⁹ The Local Income and Employment Gains Attributable to York St John University and The University of York: Estimates For 2016/17, Dr Stephen Martin, Department of Economics and Related Studies, University of York and Dr Bernard Stafford (Draft Report v1.1, November 2017)

¹⁰ 7,800 jobs out of 101,600 jobs

Table 4.1: Estimates of current economic impact in York of the University of York and York Science Park ⁽¹⁾

Element of impact	Local income** £ms			Local FTE jobs (000s)		
	University	Science Park	Total	University	Science Park	Total
Direct from employment	£200	£49	£249	4.0	1.0	5.1
Indirect from purchase with suppliers and student/delegate spend	£83	£4	£87	1.8	0.1	1.9
Total 1 st round	£283	£53	£336	5.9	1.1	7.0
Further multiplier effects	£27	£5	£32	0.6	0.1	0.7
Total all rounds	£310	£58	£368	6.4	1.2	7.7
Effects from construction activity	£4		£4	0.1	0.0	0.1
Overall effects	£315	£58	£372	6.6	1.2	7.8
Share of City of York total both jobs and GVA ⁽²⁾	6.1%	1.1%	7.2%	6.5%	1.2%	7.7%

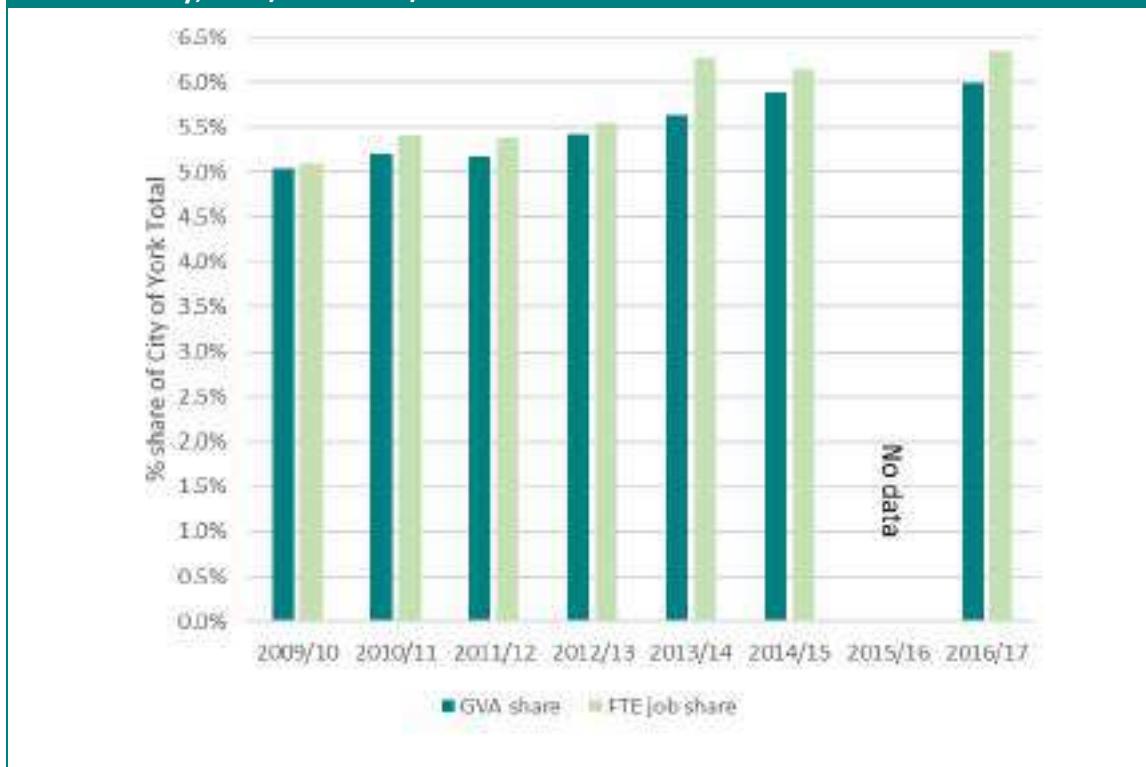
Source: The Local Income and Employment Gains Attributable to York St John University and The University of York: Estimates For 2016/17, Dr Stephen Martin, Department of Economics and Related Studies, University of York and Dr Bernard Stafford Draft Report v1.1, November 2017

Notes: (1) totals are rounded so columns and rows may not always sum; (2) the impact work measures the increase in local incomes and so in some cases excludes profit which is part of Gross Value Added (GVA), therefore the figures may understate the full role of the University in contributing to the City of York's GVA.

- 4.3 The work by Dr Martin also assesses the income contribution effect for the activities of the University. This suggests that the contribution to incomes in York from the University is some £310 million in 2016/17 and including the Science Park, some £370 million. This latter figure is equivalent to 7% of all GVA generated in York in 2016/17.
- 4.4 The relative contribution of the University to the York economy (excluding the Science Park¹¹) has risen over time as shown in Figure 4.1.

¹¹ This is excluded as the Science Park has in effect been largely complete and fully let for most of this period so has not grown significantly

Figure 4.1: Change in relative economic contribution of the University of York to the City of York economy, 2009/10 to 2016/17



Source: Nicol Economics analysis of Martin 2017 op cit. Notes: (1) there is no data and analysis for 2015; (2) the “income gain” estimates for the University and the measure of GVA are not calculated on a completely comparable basis

N8 Universities report

4.5 The N8 universities are a grouping of eight research-focussed universities in the North of England that includes the University of York¹². They recently published a report that assessed their collective impact in the North of England¹³. This concluded that in 2014/15:

- The N8 employed 48,700 staff; which translates into 43,000 full time equivalent (FTE) jobs.
- Through ‘knock-on’ effects the report estimates that the N8 universities generate a further 52,000 FTE jobs in other sectors of the economy. The great majority of these additional jobs or 48,000 are estimated to be generated in the North of England.
- The 190,000 students in the N8 universities are estimated to support a further 28,000 fte jobs in the North of England.
- Overall, the N8 universities support around 120,000 fte jobs in the North of England.

¹² The universities of Durham, Lancaster, Leeds, Liverpool, Manchester, Newcastle, Sheffield and York

¹³ The Power of 8: Knowledge, Innovation and Growth for the North, Viewforth Consulting Ltd for the N8 Research Partnership in 2015

- 4.6 We have apportioned these overall estimates for all N8 universities to the University of York based on its share of students, income and staff across the N8. This apportioning exercise suggests that, using the same methodology as the N8 report, the University of York supports overall around 10,800 fte jobs across the North of England. The main reason for the difference with the previous estimates (6,400 fte jobs in Table 4.1) is that, across the much larger area of the North of England, larger shares of supplier expenditure and other multiplier effects will be captured across than compared just to York alone.

Wider role in enterprise, innovation and productivity

- 4.7 The University plays a role in the economy of York that is much more significant than that purely measured by its economic footprint. Some of these roles have already been referenced in the section on policy context and are well-recognised by the City of York Council and the LEP. Generally, the important wider economic roles that higher education institutions can play in their local economies covering inter alia¹⁴:

- 1) Supporting business innovation and growth:
 - Universities as knowledge providers
 - Universities as innovation facilitators/brokers
 - Universities as innovation investors
 - Universities as promoters of entrepreneurial talent
- 2) Talent builders and attractors: workforce and skills development
- 3) Economic and civic leaders and place-shapers/place-makers
- 4) Investment magnets and global economic ambassadors.

Supporting business innovation and growth

- 4.8 The University is a strong research-based university and received £107 million in research income in 2016-17. It has world class research in several areas and collaborates with businesses nationally but also locally in its research areas. The work with business and other research bodies jointly helps develop the competitiveness of York and surrounding areas in some key areas of science and technology. Four examples are:
- **Healthcare and medical technologies:** as described in the Invest in York promotional material: one of the top University bioscience departments in the UK, numerous centres of excellence and a pioneering business sector, York and its wider region is emerging as a key national and European hub for health innovation.
 - **Biorenewables:** the biorenewables industry benefits from world class research at the University of York, including The Centre for Novel Agricultural Products (CNAP), the Green Chemistry Centre of Excellence and the National Non Food Crops Centre (NNFCC).
 - **Environmental research:** the York Environmental Sustainability Institute (YESI) brings together 90 researchers and the city is home to the Stockholm Environment Institute and the Centre for Low Carbon Futures.

¹⁴ Drawing on the factors summarised in “The Economic Role of UK Universities”, Universities UK, 2015

- **IT and digital:** the IT and digital technologies sector benefit from the strengths of the University of York’s Computer Science and Electronics Departments which are described as providing “specialist knowledge in safety critical systems such as car braking, flight control and communication networks, embedded transport and digital computer systems and advanced ways of improving patient care”¹⁵.

4.9 According to HESA statistics¹⁶ in 2014/15 and 2015/16 the University was, on average, involved with 450 external partners in providing consultancy services (120 of which were small and medium sized enterprises), it had 19 graduate start-ups in 2015/16 and £10 million of its research income was from collaborative research with industry. There is no information specifically on York businesses with whom the University collaborates.

4.10 The University is an active member of **Bio Vale** the regional business/research organisation focused on developing the bioeconomy. The focus is on:

- Value from bio-waste and by-products of agri-food supply chains
- High-value chemicals and advanced fuels from plants and microbes
- Smart collaboration between agri-tech and industrial biotech.

4.11 These are all areas that link to the University’s research strengths.

4.12 The University also provides a wide range of research and other facilities which are available for external use for the direct benefit of local businesses (see Figure 4.2).

Figure 4.2: University of York research and other facilities available for external use	
<ul style="list-style-type: none"> • <i>Bioscience Technology Facility:</i> state-of-the-art bioscience technologies for academic and commercial use • <i>Biorenewables Development Centre:</i> helps industry to develop and scale-up new greener processes and products. • <i>Centre for Magnetic Resonance:</i> for the study of chemical and biological systems using nuclear magnetic resonance spectroscopy • <i>Centre of Excellence in Mass Spectrometry:</i> provides access state-of-the-art mass spectrometry instrumentation and expertise • <i>Digital Creativity Labs:</i> A world centre of excellence for impact driven research in games, interactive media and the rich space where they converge. • <i>Heslington Studios:</i> Film and TV production studios • <i>Histotech:</i> customised histotechnology for tissue engineers 	<ul style="list-style-type: none"> • <i>Music Research Centre:</i> supports creative research into the use and application of technology in music • <i>Quantum Communications Hub:</i> a collaboration to exploit fundamental laws of quantum physics for the development of secure communications technologies and services • <i>York Conferences:</i> provides meeting room and conference facilities from the wide range of venues available on campus • <i>York Green Chemistry Centre of Excellence:</i> offers opportunities to research, promote, develop and implement green solutions • <i>York JEOL Nanocentre:</i> offers a facility for electron microscopy, nanoscience and nanolithography • <i>York Neuroimaging Centre:</i> offers a facility for investigating human brain function using non-invasive imaging techniques • <i>York Trials Unit:</i> conducts and co-ordinates scientific trials and provides support for external trials
Source: University of York website	

¹⁵ York Science Park web site

¹⁶ HE Business and Community Interaction Survey 2015/16

York Science Park

- 4.13 York Science Park is situated on the University of York Campus and is ultimately owned by the University. It was set up in 1994 and the first building, the Innovation Centre, was officially opened in 1995. Since then, the Science Park has expanded to provide now around 140,000 sq. ft (13,000 sqm) of business space across five buildings: Innovation Centre, Bio Centre, IT Centre, Enterprise House and The Catalyst.
- 4.14 It therefore provides spaces specifically focused on the bio sector and the IT sector and well as other science and technology based businesses.
- 4.15 The Science Park is currently host to over 120 companies in the science and technology sectors, from small start-ups to large, international corporations. Over the life of the Science Park, it has been home to over 400 businesses. A wide range of knowledge-based businesses have started or grown in the Science Park. These include:
- OptiBiotix Health Plc a growing life sciences company based in the Innovation Centre operating in one of the most progressive areas of biotechnological research - the modulation of the human microbiome.
 - Aptamer Group is a 20 strong business based at the Bio Centre that focuses on the development of aptamer technologies that offer a complementary or alternative solution to antibodies.
 - Merisis moved to York Science Park in 2005 and is based in the IT Centre. It designs, delivers and creates unique software solutions such as online insurance quotation systems, cargo tracking systems, management dashboard applications and mobile applications.
 - Simunix is a leading provider of people and business data with customers ranging from local estate agents to many of the UK's police forces.
 - Mood International is a next generation software provider based at The Catalyst Centre that provides data solutions to improve business performance.

Building and attracting talent

- 4.16 The University provides a large supply of new graduates. Each year some 3,000 to 4,000 students graduate from the University. This provides a valuable pool of talent that local businesses can tap into. According to research by the Centre of Cities, around 20% of the University's graduate are retained in York.¹⁷ It is therefore no co-incidence that York has one of the highest percentages of graduates in its population and workforce. In 2016, the 43% of its working age population possessing a qualification at NVQ4 or above (in effect degree level) places it the highest of any city in the North or Midlands of England.

¹⁷ <http://www.centreforcities.org/reader/14524-2/detailed-look-movement-students-graduates/figure-16-retention-rates-uk-city-201314-201415> data is for 2013/14 and 2014/15 and for the whole city and both universities in York

- 4.17 The University as well as supplying graduates to the city's labour market also plays an important role in continuing education and professional development. It provides courses and training in:
- Management/executive development
 - Sector and occupation specific course in: arts and heritage; business, management and law; environment and sustainable development; financial services; health; information and communication technologies; languages; public services; and science, technology and engineering.

Attracting investment

- 4.18 Make it York is the inward investment agency for the city. It highlights six sectors where York is a particularly attractive business location. Two of these¹⁸ have strong links to the activities and strengths of the University:
- **Biosciences and healthcare innovation:** the Made in Yorkshire website highlights: *"multiple centres of excellence and bespoke commercialisation facilities along with the establishment of an internationally recognised bio-economy cluster – BioVale... access to the specialist facilities at the city's award winning Science Park and the nearby National Agri-Food Innovation Campus...[and]... one of the top University bioscience departments in the UK"*
 - **Creative, digital and IT:** the Made in York web site highlights the: *"film and tv studio space at Heslington Studios and The University of York's £18 million Digital Creativity (DC) Hub, designed to harness cutting-edge research in digital games and interactive media"*.

Cultural, social and place-making impacts

- 4.19 As well as all the above factors, the University contributes in other ways to the city. The cultural and arts facilities at the University provide a broader range of cultural and artistic programming than would be the case without the University or with a smaller university. So, for instance the concerts programme at the Sir Jack Lyons Concert Hall and Central Hall is available for all residents of York.
- 4.20 The role of the University as a growing academic institution of high repute nationally and globally contributes to awareness of York as a good place to live, work and invest. The rapid growth of the University over the last 20 years will have been a major force in raising the profile of York.
- 4.21 York is regularly identified as a particularly pleasant place to live and work in national surveys. In March 2018, it was named *"the best place to live in Britain"*, according to a Sunday Times newspaper guide due to its *"perfect mix of heritage and hi-tech"*.

Conclusion on the Economic Role of the University of York

- 4.22 This review has identified the critical importance of the University to the success of the economy of the city:

¹⁸ The other four sectors are: financial and professional services; high tech rail and related industries; retail, leisure and tourism; and food and drink

- 1) First, the University is, as a business operation, the largest single provider of employment and supporter of the economy in York. Its role has been growing as the size of the University has expanded. Currently, its operations and those of the Science Park support around 1 in 12 of all jobs in the city.
- 2) Second, the research and academic activity that takes place at the University provides critical support to the development of wider economy, particularly in knowledge rich area, through business-industry links with existing firms and with potential new investors. The roles of the University in the biosciences/health care sectors and in the creative, digital and IT sectors are particularly important. These are two areas that York expects to develop as the city grows.
- 3) Third, the University attracts and develops talent. It provides a large pool of graduate for local businesses and works with businesses to train and develop their workforces. This contributes to the enviable position that York has as a city with a particularly high proportion of people with degrees in its workforce.

5. Need for growth

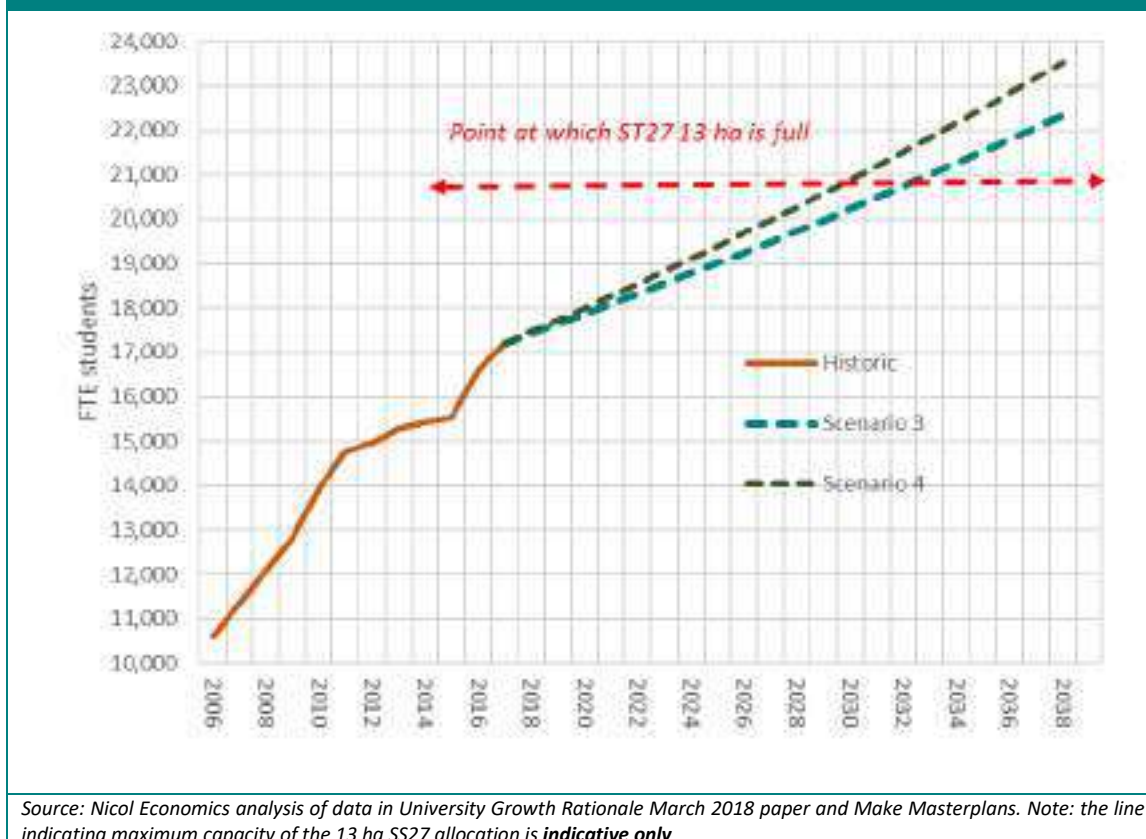
- 5.1 There is no dispute that the University will need extra space to grow. It is highly likely that it will run out of space on its Campus East extension in the early part of the next decade and planning for the next stage of growth must be done now. The issue is **how much extra space is needed** and what is required to provide certainty for the long term planning needed by the University.

Speed with which proposed allocation SS27 might be used up

- 5.2 The decision to allocate a large area of land for the Campus East development in 2007 can now be seen as a far sighted and sensible decision. It has allowed the University to continue to grow and not be constrained by the size of its campuses. Indeed, as we note in Section 3, over the 10 years since 2007 the University has grown by between around 50% and 60% in terms of number of staff and number of students respectively.
- 5.3 Inevitably there are uncertainties about the future growth trajectory of the University as a result of factors such as Brexit, changes potentially to student funding, pressure on research income etc. Attracting students, research funding and staff will continue to be a highly competitive exercise. The physical facilities that can be offered will continue to play an important role in any successful university.
- 5.4 As we set out in Section 3, the University has modelled different scenarios for growth based on changes in student numbers. This exercise considers the needs for student accommodation and other facilities and teaching, support and research space and makes provision for some growth in business collaboration/knowledge exchange space. We set out in Figure 5.1 below the two “central” scenarios for growth and the implications in terms of when the proposed SS27 allocation might be fully used up based on the space modelling for Scenarios 3 and 4.

- 5.5 The point at which number of fte students at which the University might reach full capacity on the proposed SS27 allocation is shown below. We have assumed that in terms of fte student numbers the effective capacity would be around 20,900¹⁹. On this basis, the University could reach site capacity with the proposed allocation SS27 by around 2030 to 2033. Clearly, with growth rates any faster than 1.5% the University would reach its capacity constraint with SS27 rather earlier.

Figure 5.1: When University growth might be effectively constrained by SS27



- 5.6 It must be emphasised that these estimates are intended to be broad brush only. What they do show is that based on either of Scenario 2 or 3 the University would have used up all the proposed SS27 allocation and run out of space **well before the end of the Local Plan period**, most likely by the early 2030s.

Comparing the University’s proposals with the proposed allocation SS27

- 5.7 As we set out in Section 1, the proposed allocation of 21.5 hectares in ST27 will, in reality, provide only a modest amount of space (13 hectares in practice) for future expansion once the current 65 hectares Campus East development area is fully used up:
- It would represent only a 17% increase in effective space capacity compared to the current Campus East site allocation.

¹⁹ This has been modelled largely on Scenario 2 (21,200 fte students by 2038) which the University anticipate will require 14.6 hectares compared to the 13 hectares available with the proposed SS27 allocation, we have reduced the student capacity marginally by around 300 fte students to scale this back to 13 hectares.

- The rate of development since 2007 on Campus East, assuming it is fully developed by 2023, will amount to around 4 hectares per year²⁰. In that context, an extension providing effectively only 13 hectares of extra development area only represents a few years of growth potential at the development rate over the 16 years 2008 to 2023.
- We are not suggesting that the University itself will necessarily continue to expand at the rate it has done historically²¹. However, by any measure 13 hectares of net developable area is a very modest area for expansion covering both the direct needs of the University and providing York with the space to capitalise on opportunities from knowledge base businesses seeking proximity to the University.

- 5.8 It is possible to provide some idea of the expansion space difference between the proposed draft Local Plan allocations and the University’s preferred option (see Table 1.1 earlier). We have focussed on residential space. As noted in the University’s October 2017 reps on the pre-publication draft Local Plan, a new residential college for 650 students (Constantine College) on Campus East has a building footprint of around 5,600 sqm and a total site take of 2.0 hectares.
- 5.9 A simple analysis is set out below in Table 5.1, this compares the capacity for extra full-time students. The masterplanning of the two options (draft Local Plan and University’s alternative proposal) show that the University could accommodate space for around 900 students under the draft Local Plan allocation but 2,800 under the University’s proposal.
- 5.10 As noted in Section 3, the University’s central scenarios forecast the need to accommodate around 5,000 to 6,000 extra students by the mid to late 2030s. The planned development of student accommodation on the existing Campus East area²² coupled with the current ST27 allocation would fall well below this anticipated level of growth.
- 5.11 The masterplans have different assumed proportions of residential and other uses on the extension sites which in part amplifies the difference. This is because the experience of the University expansion is that it is important to avoid areas which are solely residential student accommodation to ensure a vibrant mixed use campus area. The analysis shows that the capacity for the University to expand beyond the early 2020s would be limited with the proposed allocation ST27.

Table 5.1: Potential extra student numbers in Campus East extension options				
Factors		ST27: draft Local Plan proposed allocation	University proposal	Difference
Floor areas for residential (sqm GIA)		26,600	81,100	54,500
Floorplate area for residential (sqm)*		7,950	23,750	15,800
Site area (@28%) of development floorplate	sqm	28,393	56,429	25,357
	Hectares	2.8	5.6	2.5
Student capacity		900	2,800	1,900
<i>Source: Nicol Economics analysis of Make masterplans for different extension options and the analysis of accommodation space footprints in October 2017 reps from University to pre-Publication draft Local Plan</i>				

²⁰ 65 hectares divided by 16 years

²¹ The University’s own work on growth scenarios suggests they do not expect quite the same rate of growth in student numbers to continue

²² College 10 and 11 with around 1,200 bed spaces, plus some redevelopment of Campus West to deliver a further 600 bed spaces

Potential economic impact consequences

- 5.12 Comparing the economic impacts of the two quantum of development as set out in Tables 1.1 and 5.1 is quite difficult as there are different mixes of space for student accommodation, academic teaching and research, business collaboration space etc.
- 5.13 We have carried out a high level assessment of the two campus extension options. This is a complex exercise as different factors impact on the University’s ability to grow: it needs academic space for teaching and research, it needs accommodation for students, especially considering the likely requirement to provide on campus accommodation to meet future student expansion. There is also a strong aspiration and associated policy in the outline planning permission for the campus extension and in the draft Local Plan to provide space of non-university employment uses. The current proposed allocation ST27 does not allow for the expansion of residential accommodation, teaching space and to allow for substantial extra business space.
- 5.14 We have carried out a high level analysis based only on two elements:
- student accommodation and associated student numbers and
 - space for businesses²³.
- 5.15 The factors linking overall jobs impact and **student numbers** are set out in Table 5.2. This is a broad brush way of measuring the factors that drive the overall economic impact of the University²⁴, but we consider that it is a reasonable broad proxy for these factors collectively. It suggests that overall on average there are around 0.4 fte jobs supported in York for every 1 fte student at the University.

Table 5.2 Total jobs per fte student, 2016/17, University of York	
Direct jobs at the University	0.24
Indirect in supply chain and from student spend	0.11
Direct and Indirect	0.35
Induced	0.03
All	0.39

Source: Nicol Economics analysis of data in Tables 3.1 and 4.1 in this report

- 5.16 The second component is the **potential business space** for “associated employment uses”. This also differs, but by less, between the proposed allocation ST27 and the University’s preferred option. We have assessed the potential future role of this space in accommodating extra businesses in York by assuming: 85% net internal to gross space utilisation and an employment density of 12 sqm per fte job and 90% occupancy. The results are set out in Table 5.3 and suggest that in directly measurable terms:
- The proposed allocation could support an expansion that would help increase the overall economic impact of the University by around 360 jobs compared to over 1,000 jobs under the University’s proposals. The difference results from the ability for more student growth with the larger site.

²³ The other space use components of academic and social/hub as assumed to be supporting the student numbers (in terms of social activities or teaching facilities); the University in its scenarios for growth works based on roughly 12.7 sqm (GIA) of extra space for collectively support, teaching, central services, catering, commercial/retail and lab/research space for every extra fte student

²⁴ As there are other important factors such as research income and sales of other services such as conferences

- The difference between the two options for business/collaboration space is less marked as the masterplanning proposals for ST27 allow for a relatively generous amount of business space to reflect the relatively low quantum on the Campus East current extension compared to original plans and to provide for a strong mix of uses on the Campus East extension.
 - The overall measurable difference in fte jobs is around 1,100 which is around 14% of the current combined economic effects of the University and Science Park.
 - On a pro rata basis, based on the 2016/17 estimates, the associated difference in income/GVA would be around £50 million per annum.
- 5.17 These estimates are of course sensitive to the assumptions in the masterplanning about the amount of space by different uses in each site proposal. Were the masterplanning for the proposed ST27 to have reduced the amount of business space and increased the residential space, then the measurable economic difference between the two site allocation proposals would be somewhat larger.
- 5.18 These estimates only consider the direct measurable impact of the University, they do not take into account the difference in the wider consequences for more limited growth for York.

Table 5.3: Estimates of directly measurable differences in economic impact as between allocation ST27 and the University's proposed expansion site (fte jobs) ⁽¹⁾				
Element of directly measurable economic effects		ST27: draft Local Plan proposed allocation	University proposal	Difference
Student numbers	Numbers in accommodation ⁽²⁾	920	2,760	1,830
	Associated overall economic impact in York (A)	360	1,070	710
Business space	GIA sqm	19,300	23,900	4,600
	NIA sqm	16,405	20,315	3,910
	Direct jobs on site ⁽³⁾	1,230	1,520	290
	Knock on effects	150	240	90
	Total potential effects (B)	1,380	1,760	380
Overall effects (A) + (B)		1,740	2,830	1,090

Source: Nicol Economics analysis. Notes: (1) all numbers rounded to 10 fte jobs, so totals may not add due to rounding; (2) based on Table 5.1; (3) assumes 85% GIA to NIA space and 12 sqm per fte jobs (and 90% occupancy of space), the estimates measure the amount of employment that could be accommodated in the space, it does not take account of any displacement effects within York

6. Conclusions

6.1 This report has assessed the current and potential future role of the University. There are several key points:

- 1) The University and its associated activity such as the Science Park makes a **very substantial and measurable contribution to the York economy**. They support around 7,800 fte jobs or 1 in 12 of all jobs in the city and around £370 million in income. Potentially across the whole of the North of England, the University may be supporting of the order 10,800 fte jobs.
- 2) The University has **grown strongly over the last 10 years** since the 65 hectare Campus East extension was granted planning permission. Student numbers have increased by nearly 60% from 10,600 fte students in 2017/8 to 16,600 by 2016/17. There has been further strong growth in 2017/18.
- 3) However, the University plays a much **wider role in the city and its sub-region**. The research and academic activity that takes place at the University provides critical support to the development of wider economy, particularly in knowledge rich area, through business-industry links with existing firms and with potential new investors. The roles of the University in the biosciences/health care sectors and in the creative, digital and IT sectors are particularly important. These are two areas that York expects to develop as the city grows.
- 4) The University also **attracts and develops talent** – this is part of its core business. It provides a large pool of graduate for local businesses and works with businesses to train and develop their workforces. This contributes to the enviable position that York has as a city with a particularly high proportion of people with degrees in its workforce.
- 5) These important roles are, not surprisingly, recognised in York’s economic strategy and throughout the draft Local Plan as well as by the two Local Enterprise Partnerships in which York sits.
- 6) However, the proposed allocation ST27 in the draft Local Plan only allows for an extra 13 hectares of development land, or a just 17% increase on the current Campus East area. The City of York Council and the draft Local Plan clearly identify that the University will have run out of space on the current Campus East area by the early part of the next decade. The University’s alternative proposal would allow for double this amount of space at 26 hectares of developable area.
- 7) Future growth scenarios 2 and 3 are described by the University as the “*minimum prudent scenarios for planning purposes*” (1.25% and 1.5% pa average growth rates in fte student numbers respectively). Under these growth scenarios our modelling suggests that the University may well **fully use up the proposed allocation SS27 by the early 2030s**. If the rate of growth is faster than these two scenarios, then this could happen rather sooner.
- 8) The Local Plan is setting out development plans and future green belt boundaries until 2038. Over this period, the amount of effective expansion land proposed in ST27 is clearly inadequate for the University’s needs and will curtail its growth plans and so future economic contribution in three ways:

- First, by limiting the amount of student and academic accommodation that can be built out and associated scale of the University.
 - Second, by constraining the amount of business space for “associated business activities” and the ability for the area of Campus East to provide for “*B1b knowledge based businesses including research led science park uses*”.
 - Third, by limiting the expansion of its research and associated business collaboration and knowledge transfer activities which are so important for the future economic growth of York and its surrounds in sectors such as biotechnology, bio-renewables, agri-tech and IT/digital.
- 9) The precise impacts are difficult to ascertain as it depends on the mix of space that could be built out, actual future needs and the level of demand for associated business space. We have quantified the direct measurable potential “loss” to the York economy in the future from sticking to allocation ST27 as around 1,100 fte jobs and £50 million in annual income/GVA.
- 10) However, this is an indicative figure only. More importantly it does not capture the knock consequences on the wider economic role of the University if it is unable to expand fully as it could do.



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University of York Campus East

Development Options and Masterplan for Extension Site

Date
28 March 2018

Revision
5



Campus East

—

Introduction

This report is focussed on opportunities for development and expansion available to the University of York. The original campus - Campus West – is 68ha (plus 8.9ha on the Science Park) and has very little development potential remaining other than replacement of existing buildings or building on car parks. For Campus East, Condition 4 of the outline planning permission restricts the developed footprint (to include buildings, car parks and access roads) of the “allocated area” (65ha) to 23% of the total area (approximately 14.95ha). Whilst over 50% of this 14.95ha has been built out within the first 10 years, there is scope for new building, particularly on its western and eastern sides.

The overarching masterplanning philosophy for both campuses is that of evolving a low density and landscape-dominated university. Many of the existing collegiate and academic buildings on Campus East are large buildings that need space to express themselves. It would be harmful to the original masterplan philosophy and the design intention for these buildings to build between them. Any future development is therefore better suited to currently undeveloped sites, for example to the western and eastern ends of the campus.

Beyond the existing 65ha “allocated area”, options for providing additional area for the anticipated future growth are restricted: three of the four buffers cannot be altered. To the west of the existing campus sits the small-scale properties of Heslington and to the north the landscape rises up towards Badger Hill housing development. Any closer development would certainly dominate these neighbouring villages and consideration must be given to protecting the character and amenity of both. Finally, the area to the east of the campus is already developed for indoor and outdoor sports facilities. Extending south of the existing lake, therefore, forms the most appropriate area for future expansion.

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Campus East

Building out the allocated area

The opportunities below highlight the range and scale of sites available under the consented 23% developed footprint ratio, within the area allocated for development (red dotted line).

Opportunities:

1. Western site (north): located at the key pedestrian, cyclist and bus entrance to the campus. Opportunity for new student accommodation
2. Western site (south): adjacent to the lake and, as per 1, located at the key pedestrian, cyclist and bus entrance to the campus. Opportunity for new student accommodation
3. Western 'gateway' site (in between new residences): opportunity for an arrival building at the western entrance
4. Catalyst Car Park and Management Annex: opportunity for a mid-size building, either academic or further enterprise space
5. Central Vista: opportunity for a welcome building/pavilion
6. Connections between Ron Cooke Hub and Piazza Building: opportunity to characterise the Campus' primary arrival point
7. Eastern infill site (between Langwith and Constantine Colleges): opportunity for book-ending the generous space between the colleges
8. North-eastern site (east of Constantine College): opportunities for large development(s), including a substantial provision of student accommodation



Opportunities for building on Campus East within the area allocated for development

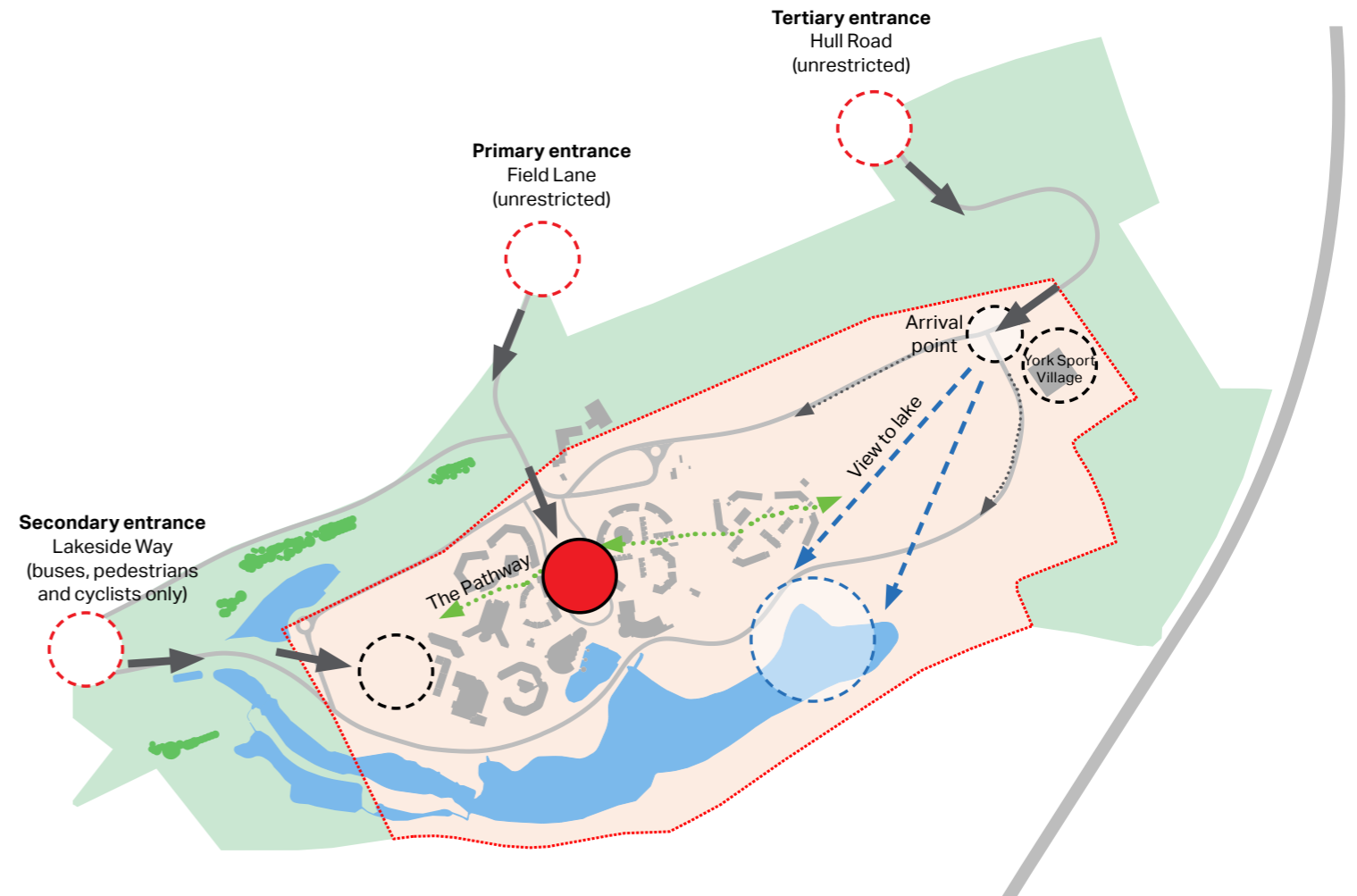
Campus East

North-east site

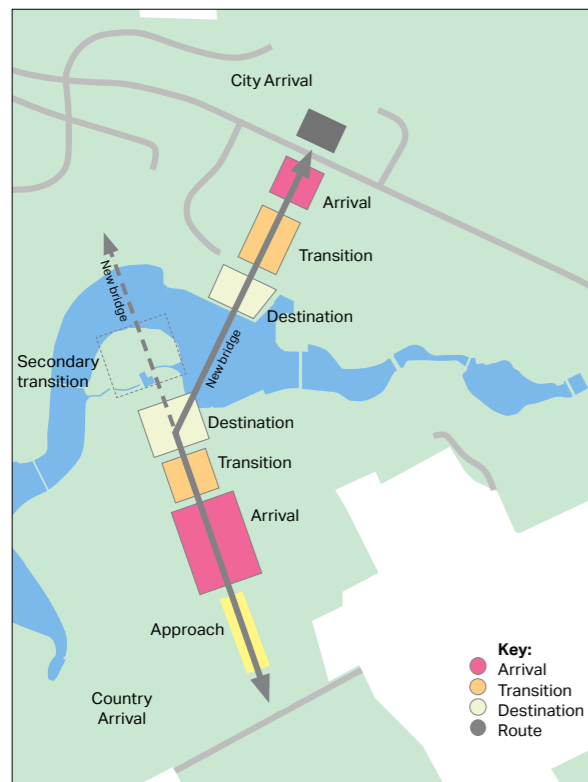
The existing primary entrance from Field Lane is marked by a generous arrival sequence, which is then terminated by a pair of landmark buildings (Ron Cooke Hub and Piazza Building) and views across the lake. The most direct connection between Campus West and Campus East for cyclists, pedestrians and buses is via the Lakeside Way entrance. The entrance from Hull Road is currently of less significance, due to the eastern end of the campus being largely undeveloped. However, the site east of Constantine College is of a large enough scale to create an additional significant arrival point.

The topography of the site (raised to the north and sloping down towards the lake) naturally lends itself to curating views towards the water. A clear diagonal route can connect a generous arrival point (marked by significant buildings and a public square, for example) with a final destination – in this instance, views across the lake.

The Pathway currently meanders east-west through the three colleges and will continue into this new cluster, creating strong connections from the north-east into the heart of the campus.



Existing entrances to Campus East



Extract from City and Country Arrival sequences (Campus West)



Extract from Market Square arrival sequence: City Arrival (Campus West)



Creating an arrival sequence from Hull Road entrance

Campus East

Building heights

There is the opportunity for the north eastern area to be seen as a new cluster with a mix of uses that will combine to create a diverse, lively area. This will help 'book-end' the band of more private, quieter areas (Langwith and Constantine Colleges, for example), to promote animation and activation throughout the campus.

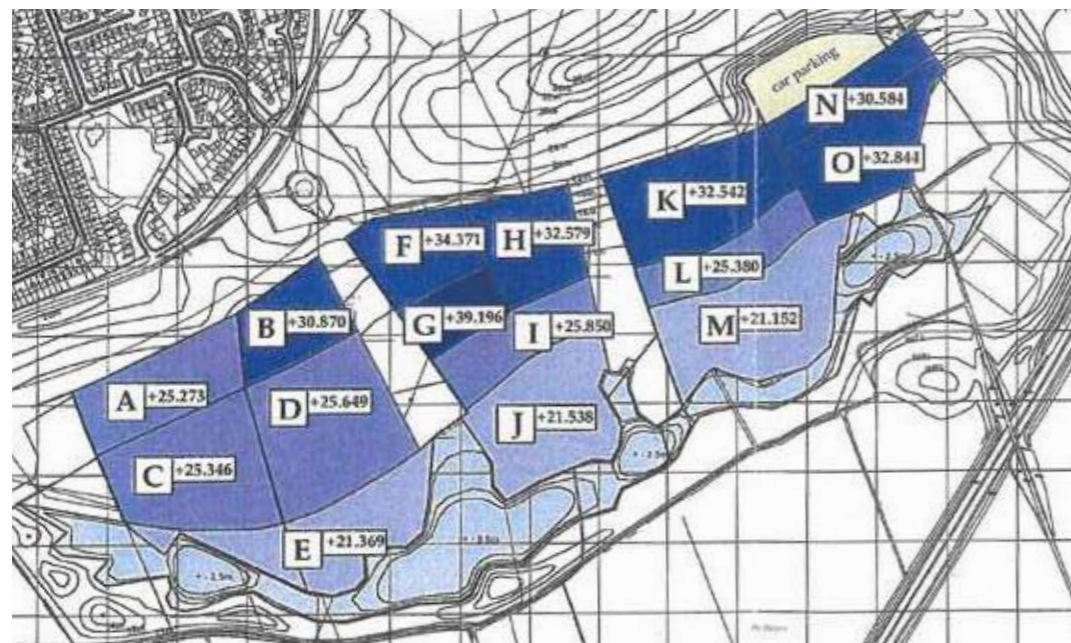
Following the strategy of other areas within the masterplan framework, there is a focus on positive placemaking, which can be achieved by forming a hierarchy of spaces and places. In this instance, a large central space can house an animated and landscaped open area, supported by smaller, more intimate courtyards in the centre of each building cluster.

A benefit of developing this north eastern area is that it allows the university to develop a large number of student accommodation units without any dependency on other developments. To maximise units there is a greater opportunity to be created by placing the student accommodation to the north, where the consented building heights diagram illustrates the potential of building taller towards Kimberlow Hill.

Buildings will be required to step down to the south, towards the lake, thus creating variety across the site and further distinguishing between residential and non-residential developments. Non-residential developments can comprise a combination of academic, social and enterprise/business spaces supported by shared learning areas and catering outlets.



Massing proposal



Maximum building heights diagram within the Master Plan and Strategic Design Brief Document May 2008-2014
N.B. Numbers are AOD levels only



Building heights zoning overlay; the darker shades of blue represent taller buildings

Campus East

Forming a hierarchy

Extending the existing primary neighbourhood into the southern extension sits at the very heart of the masterplan proposal. The 'perceived centre' to the campus can be focused on the centre of the lake, much like on Campus West. Interestingly, it is possible to extend the routes from the three arrival points at the north of the campus. By integrating crossings over the lake (bridges or pontoons) these converge at one point south of the lake, which in turn can form a destination to each of these journeys and the heart of the new primary neighbourhood.

The proposed 26ha site south of the lake is a lot more central than the smaller option being proposed by the Council. It can be connected to many areas of the existing campus

with a series of bridges and is therefore a better option for promoting an integrated and vibrant community.

These connections must be reinforced by landmark buildings to form a vibrant environment. This hierarchy ultimately draws people into the heart of the campus. The Ron Cooke Hub and Piazza Building began this process, and should be supported with at least two landmark buildings to the south of the lake. The use of glazed canopies has been discussed on Campus West as a means of denoting primary areas and arrival points. Two similar structures – one each to the north and south – should be considered as a means of elevating this key axis.



Ron Cooke Hub



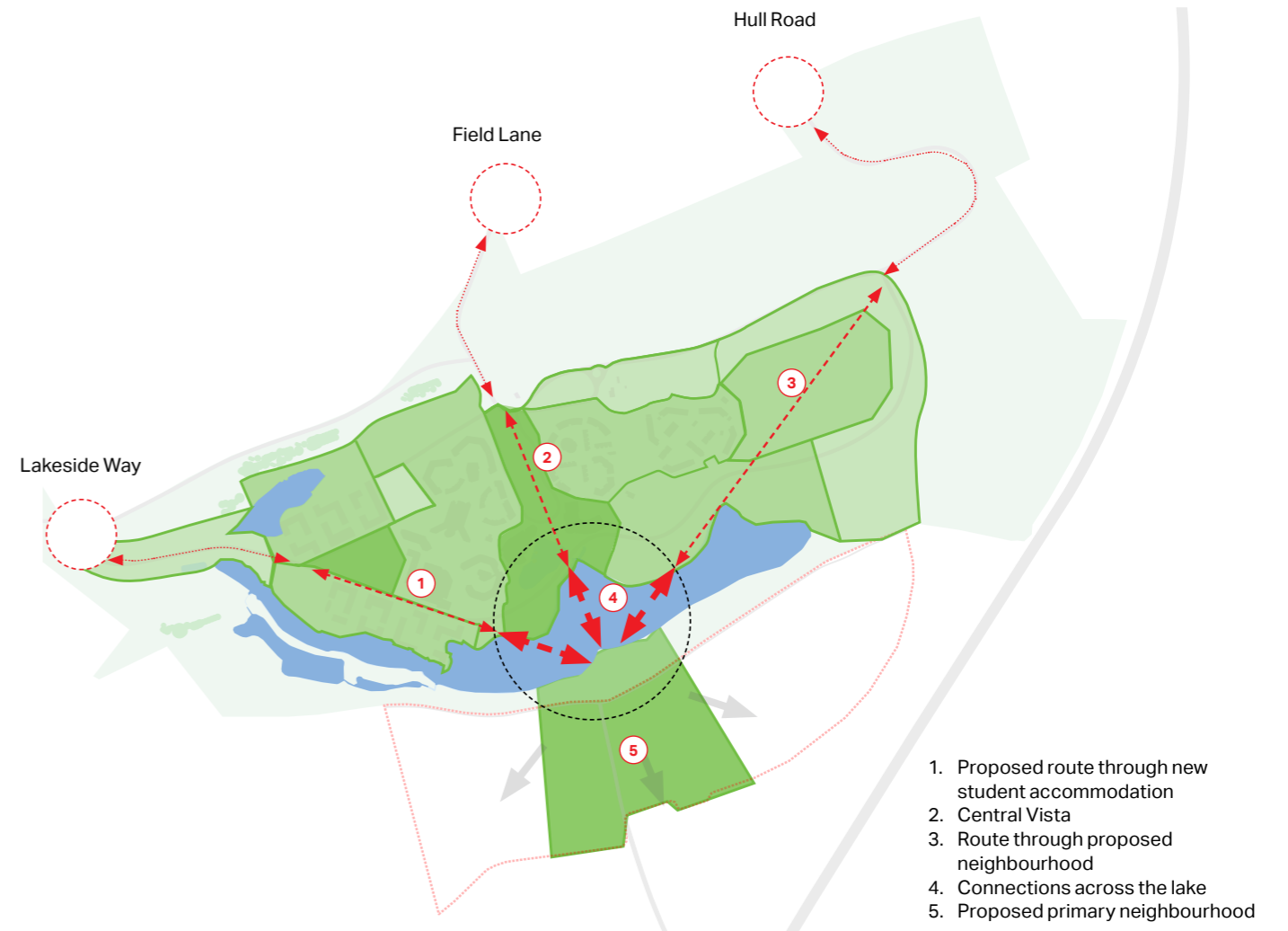
Glass roof, Milan Exhibition Centre



Proposed crossing from Greg's Place (Campus West)



Animating lakeside areas with structures and seating



Extending the arrival points to form a centre



Continuing the cluster formed currently north of the lake

Masterplan framework

Full proposal

The completed vision – across Campuses West and East – aims to provide unity and coherence across the university. The proposal is intended as a framework, but as the masterplan develops thought should be given to revisiting, adapting and updating the proposal to align with the university's latest requirements and philosophies.

One theme that must be at the forefront of all stages of development is that of the campus being formed of a series of buildings placed in the landscape. The proposal opposite emphasises Campus East being developed with a strong landscape influence, introducing water into the south extension and north-eastern site, and dense planting of trees. Creating a coherent landscape strategy across the large expansion sites will serve to embed the proposed buildings and reduce the feeling of openness currently experienced on the existing Campus East.

The existing buildings on Campus East typically step down from a high point to the north of the campus (circa five storeys) down to approximately three storeys towards the lake. This is a strategy illustrated on the maximum building heights plan, which formed part of the consented masterplan proposal. The proposed developments that construct within the consented 'allocated area' of the existing campus continue this approach. South of the lake, however, the proposal outlines more consistent building heights, although within these maximum limits some variety should be explored on a building-by-building basis. The diagram below illustrates the heights of the existing buildings and is extended to incorporate the proposals from this study.



Indicated heights diagram to reflect existing buildings and proposed development relative to grade level. Levels to be read in conjunction with Maximum Building heights diagram within the Master Plan and Strategic Design Brief Document May 2008-2014, which has been reproduced on page 6 of this document



Combined masterplan framework illustrated proposal



- Key:**
- Existing building
 - Social/hub building
 - Residences
 - Academic building
 - Business/collaboration building
 - Multi-storey car park
 - Designated cycle path

Campus East extension

Building areas



Illustrated proposal of Campus East future development

Campus East (existing - north of lake)					
Building	Use	Location	Floorplate area	Floors	Total building GIA (sqm)
37	Residential	Western gateway	1100	3	3300
38	Residential	Western gateway	850	3	2550
39	Residential	Western gateway	850	3	2550
40	Residential	Western gateway	1000	3	3000
41	Residential	Western gateway	500	3	1500
42	Residential	Western gateway	1500	3	4500
43	Residential	Western gateway	1150	4	4600
44	Residential	Western gateway	400	3	1200
45	Residential	Western gateway	300	4	1200
46	Residential	Western gateway	300	3	900
47	Residential	Western gateway	450	4	1800
48	Residential	Western gateway	450	3	1350
49	Residential	Western gateway	650	3	1950
50	Residential	Western gateway	600	4	2400
51	Residential	Western gateway	150	3	450
52	Residential	Western gateway	450	4	1800
53	Residential	Western gateway	450	3	1350
54	Residential	Western gateway	250	3	750
55	Nursery	Field Lane	700	1	700
60	Academic	Western gateway	650	3	1950
61	Academic	Western gateway	650	3	1950
62	Academic	Western gateway	1200	3	3600
63	Academic	Western gateway	1200	3	3600
64	Business/collaboration	Catalyst car park	1900	2	3800
65	Entrance pavilion	Central vista	200	1	200
66	Glazed canopy	Ron Cooke/Piazza	1000	-	
67	Academic	Lakeside Way	750	2	1500
68	Academic	Lakeside Way	1250	3	3750
69	Academic	Lakeside Way	1400	3	4200
70	Residential	North east	750	3	2250
71	Residential	North east	900	3	2700
72	Residential	North east	900	3	2700
73	Residential	North east	500	4	2000
74	Residential	North east	1300	4	5200
75	Residential	North east	900	3	2700
76	Residential	North east	1350	4	5400
77	Residential	North east	500	3	1500
78	Business/collaboration	North east	1100	3	3300
79	Business/collaboration	North east	1300	3	3900
80	Business/collaboration	North east	1350	3	4050
81	Business/collaboration	North east	1200	3	3600
82	Academic	North east	1200	2	2400
83	Academic	North east	1000	3	3000
84	Academic	North east	900	3	2700
85	Academic	North east	1000	2	2000
86	Academic	North east	900	2	1800
TOTAL					113600

Campus East (existing - north of lake)		
Use	Total building GIA (sqm)	% total
Residential	61600	54%
Nursery	700	1%
Entrance pavilion	200	0%
Academic	32450	29%
Business/collaboration	18650	16%
TOTAL	113600	

Please note that these areas have been prepared for the University of York. They are indicative only and are subject to layout changes. Any decisions to be made on the basis of these, whether as to project viability, pre-letting, lease agreements or the like, should include due allowance for the increases and decreases inherent in the design development and building processes.

Campus East (extension - south of lake)					
Building	Use	Location	Floorplate area	Floors	Total building GIA (sqm)
87	Residential	Phase I	850	3	2550
88	Residential	Phase I	450	4	1800
89	Residential	Phase I	450	4	1800
90	Residential	Phase I	900	3	2700
91	Residential	Phase I	1050	4	4200
92	Residential	Phase I	850	3	2550
93	Residential	Phase I	850	4	3400
94	Business/collaboration	Phase I	900	3	2700
95	Academic	Phase I	1000	2	2000
96	Academic	Phase I	1000	3	3000
97	Business/collaboration	Phase I	1300	2	2600
98	Academic	Phase I	1300	3	3900
99	Business/collaboration	Phase I	1300	3	3900
100	Business/collaboration	Phase I	1300	3	3900
101	Academic	Phase II.a	850	2	1700
102	Academic	Phase II.a	1200	3	3600
103	Social/hub	Phase II.a	2250	4	9000
104	Residential	Phase II.a	1100	3	3300
105	Residential	Phase II.a	850	4	3400
106	Residential	Phase II.a	1050	3	3150
107	Residential	Phase II.a	500	4	2000
108	Residential	Phase II.a	300	4	1200
109	Social/hub	Phase II.b	1800	3	5400
110	Academic	Phase II.b	800	3	2400
111	Academic	Phase II.b	800	3	2400
112	Residential	Phase II.b	500	3	1500
113	Residential	Phase II.b	1500	3	4500
114	Residential	Phase II.b	1000	4	4000
115	Residential	Phase II.b	950	3	2850
116	Residential	Phase III	600	4	2400
117	Residential	Phase III	300	3	900
118	Residential	Phase III	850	3	2550
119	Residential	Phase III	650	4	2600
120	Residential	Phase III	1050	3	3150
121	Residential	Phase III	700	4	2800
122	Residential	Phase III	400	3	1200
123	Residential	Phase III	400	4	1600
124	Business/collaboration	Phase III	1800	4	7200
125	Business/collaboration	Phase III	1800	2	3600
126	Academic	Phase III	1500	3	4500
127	Academic	Phase III	2750	3	8250
128	Multi-storey car park	Phase III	1400	2	2800
129	Multi-storey car park	Phase III	1400	3	4200
130	Residential	Phase IV	325	3	975
131	Residential	Phase IV	500	4	2000
132	Residential	Phase IV	325	3	975
133	Residential	Phase IV	500	4	2000
134	Residential	Phase IV	1050	3	3150
135	Residential	Phase IV	1050	4	4200
136	Residential	Phase IV	1100	3	3300
137	Residential	Phase IV	800	3	2400
TOTAL					158150

Campus East (extension - south of lake)		
Use	Total building GIA (sqm)	% total
Residential	81100	51%
Social/hub	14400	9%
Academic	31750	20%
Business/collaboration	23900	15%
Multi-storey car park	7000	4%
TOTAL	158150	

Campus East extension

Building areas (reduced option)



Illustrated proposal of Campus East future development

Campus East (extension - south of lake)					
Building	Use	Location	Floorplate area	Floors	Total building GIA (sqm)
1	Residential	South of lake	1000	3	3000
2	Residential	South of lake	1000	4	4000
3	Residential	South of lake	500	3	1500
4	Residential	South of lake	1500	3	4500
5	Residential	South of lake	1150	3	3450
6	Residential	South of lake	800	4	3200
7	Residential	South of lake	1050	3	3150
8	Residential	South of lake	950	4	3800
9	Social/hub	South of lake	1500	2	3000
10	Academic	South of lake	1350	3	4050
11	Business/collaboration	South of lake	900	2	1800
12	Business/collaboration	South of lake	1500	2	3000
13	Business/collaboration	South of lake	1500	3	4500
14	Academic	South of lake	1250	3	3750
15	Academic	South of lake	2750	3	8250
16	Business/collaboration	South of lake	1400	2	2800
17	Business/collaboration	South of lake	1400	3	4200
18	Business/collaboration	South of lake	1500	2	3000
19	Multi-storey car park	South of lake	2800	2	5600
TOTAL					70550

Campus East (extension - south of lake)		
Use	Total building GIA (sqm)	% total
Residential	26600	38%
Social/hub	3000	4%
Academic	16050	23%
Business/collaboration	19300	27%
Multi-storey car park	5600	8%
TOTAL	70550	

Please note that these areas have been prepared for the University of York. They are indicative only and are subject to layout changes. Any decisions to be made on the basis of these, whether as to project viability, pre-letting, lease agreements or the like, should include due allowance for the increases and decreases inherent in the design development and building processes.

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G

GILLESPIES

LVA OF PROPOSED UNIVERSITY OF YORK EXTENSION ALLOCATIONS

APPENDIX 1: FIGURES AND VIEWPOINTS

WRITTEN	CHECKED	APPROVED	DATE	REVISION	COMMENTS
HMB	MM	TW	23/03/2018	00	DRAFT FOR INITIAL REVIEW
HMB	MM	TW	29/03/2018	01	REVISED DRAFT
HMB	RM	TW	03/04/2018	02	FINAL ISSUE

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INTRODUCTION

& FIGURES

This document contains figures and viewpoint images as an appendix supporting the Outline Landscape & Visual Appraisal of Proposed Extension Allocations within the City of York Local Plan for Campus East, University of York.

FIG 1: STUDY AREA

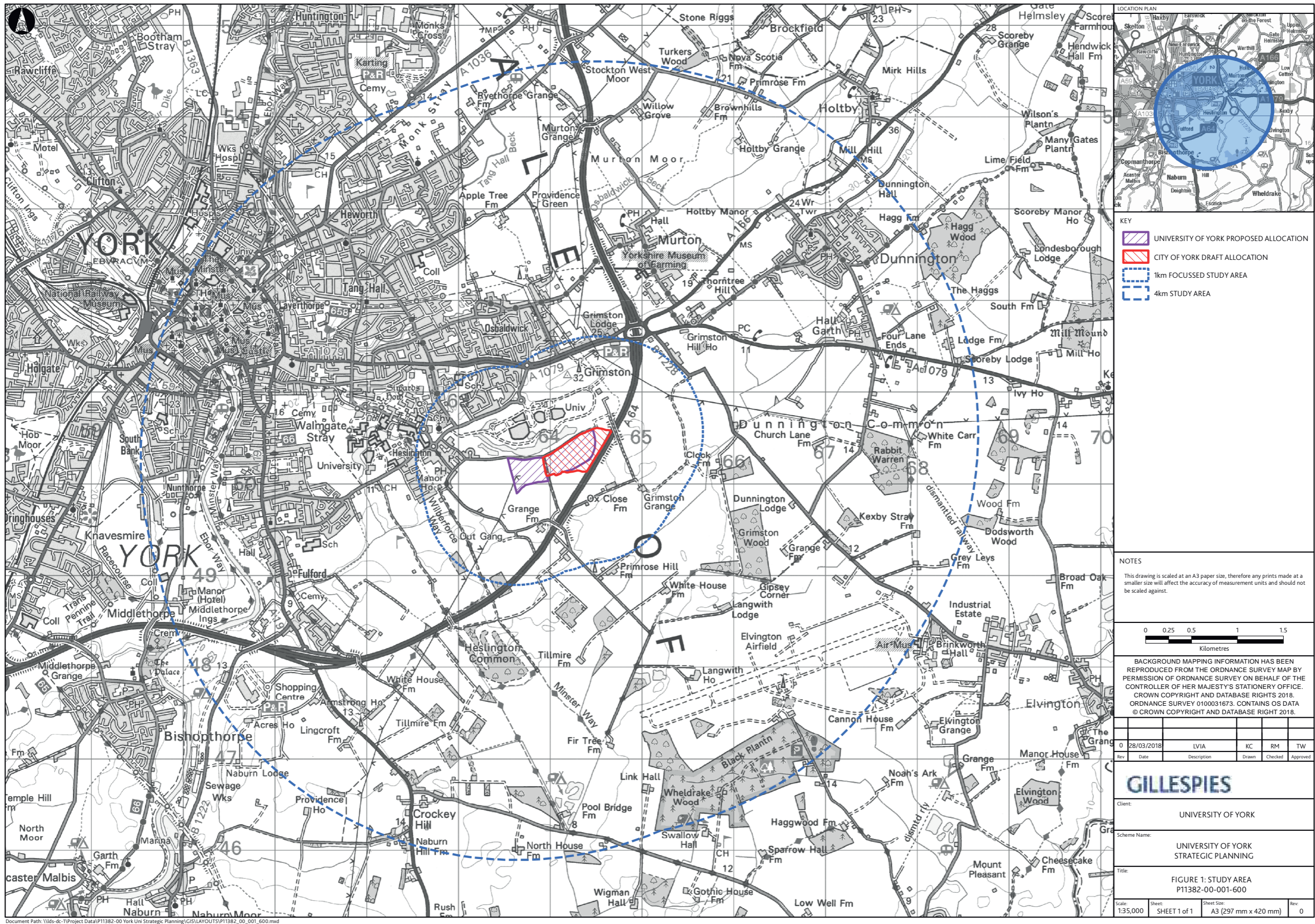


FIG 2: DESIGNATIONS IN THE STUDY AREA

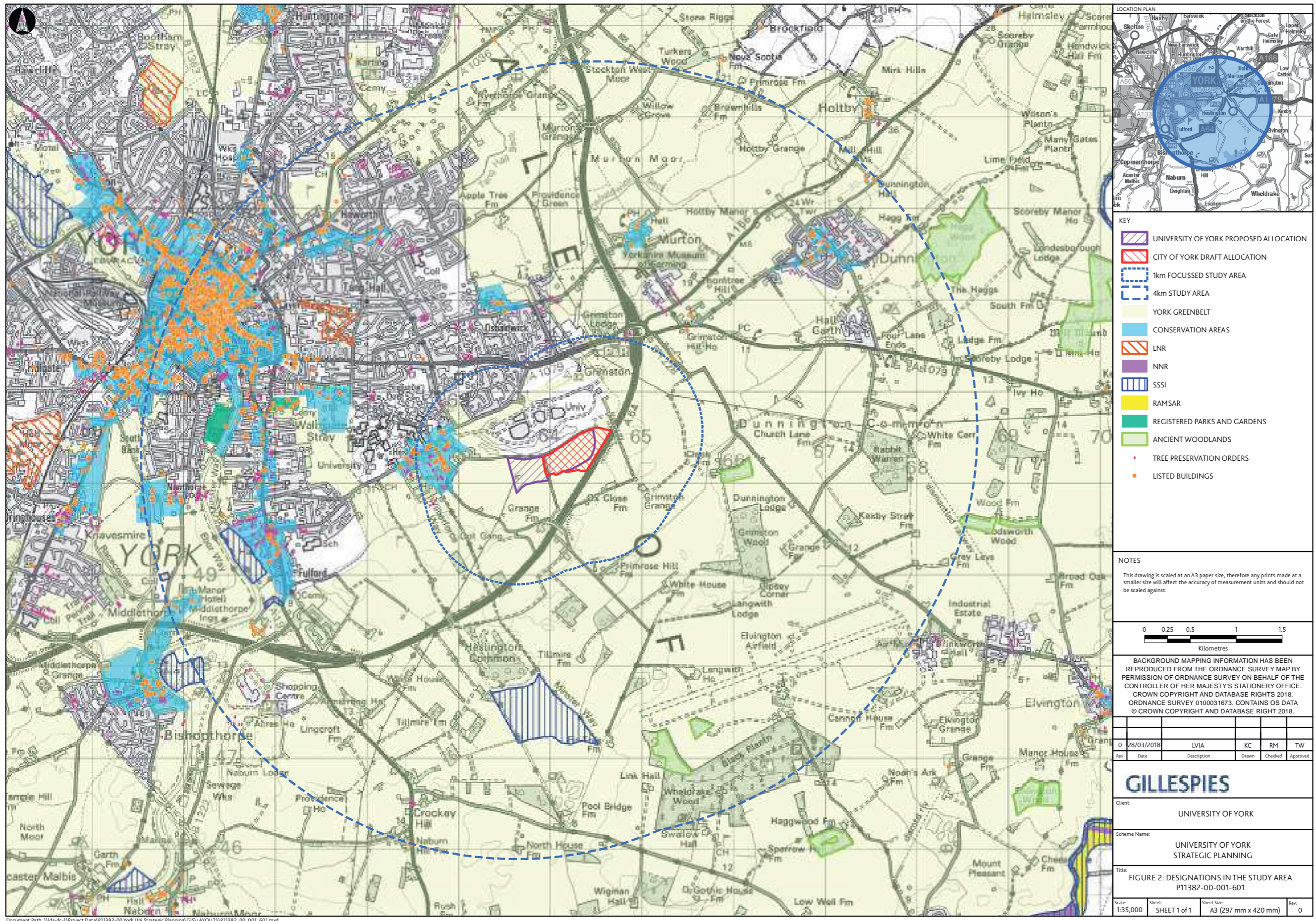
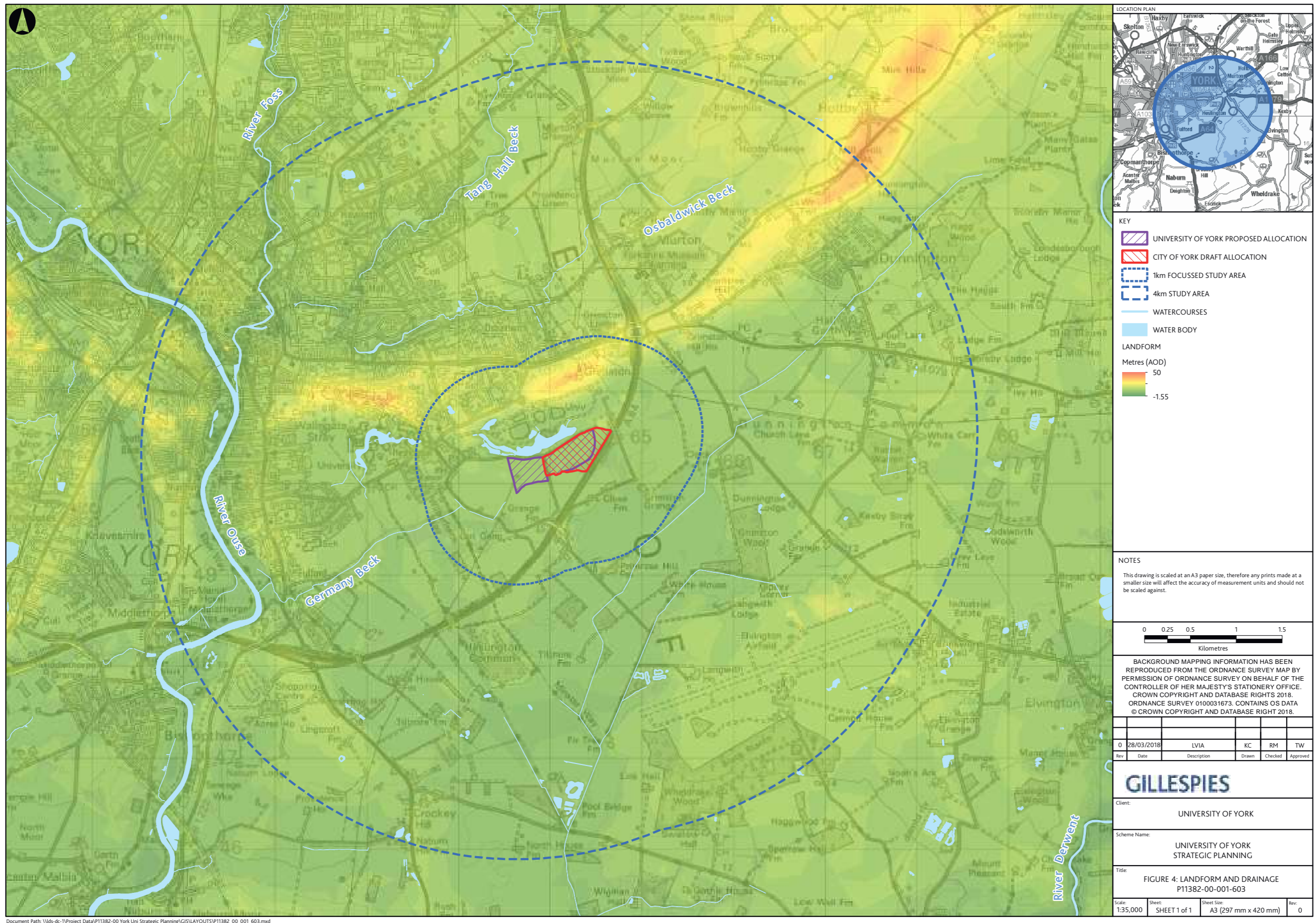


FIG 3: DETAILED STUDY AREA CONTEXT



FIG 4: LANDFORM AND DRAINAGE



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FIG 5: LANDSCAPE CHARACTER AREAS

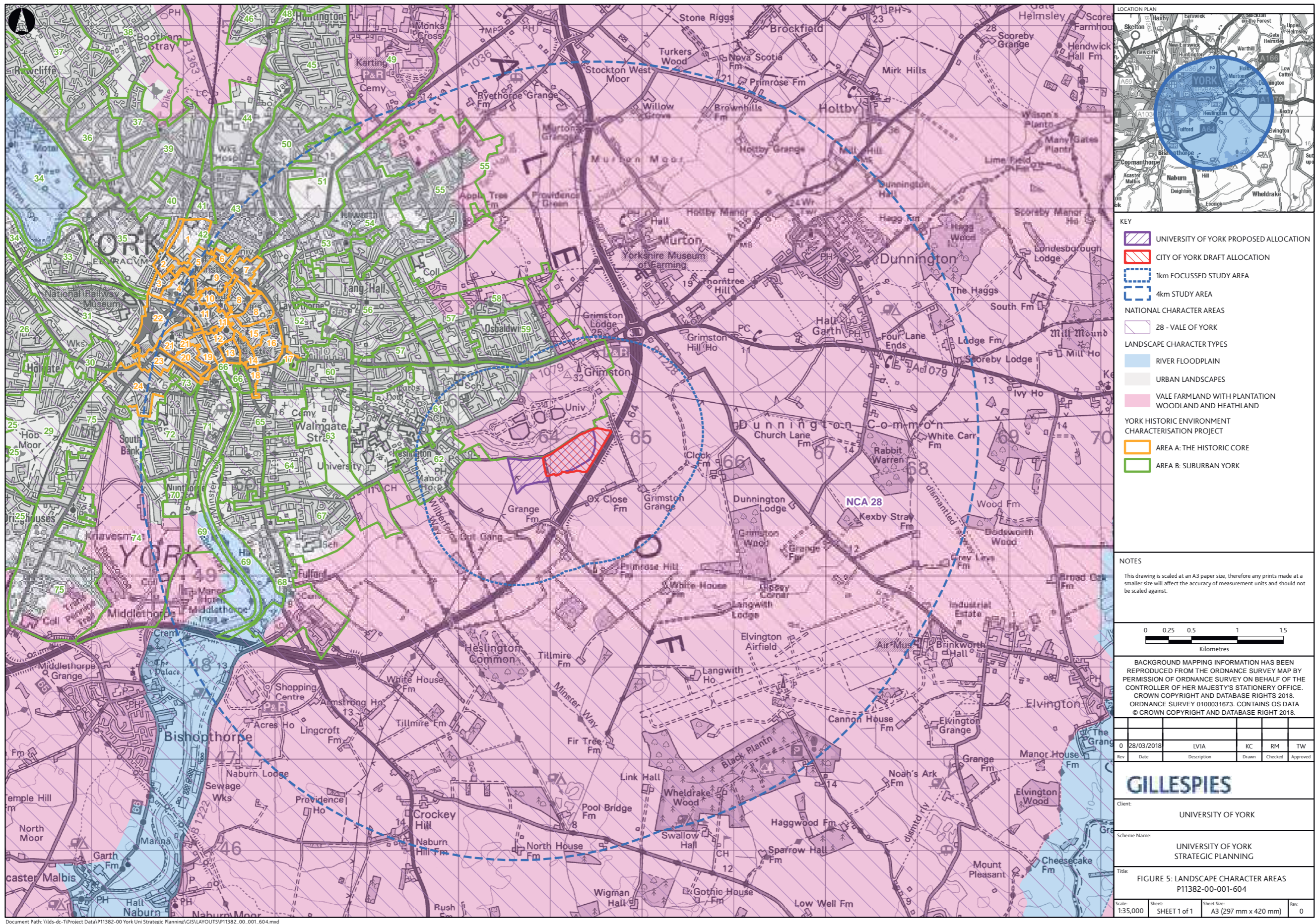


FIG 6: LANDSCAPE RECEPTORS

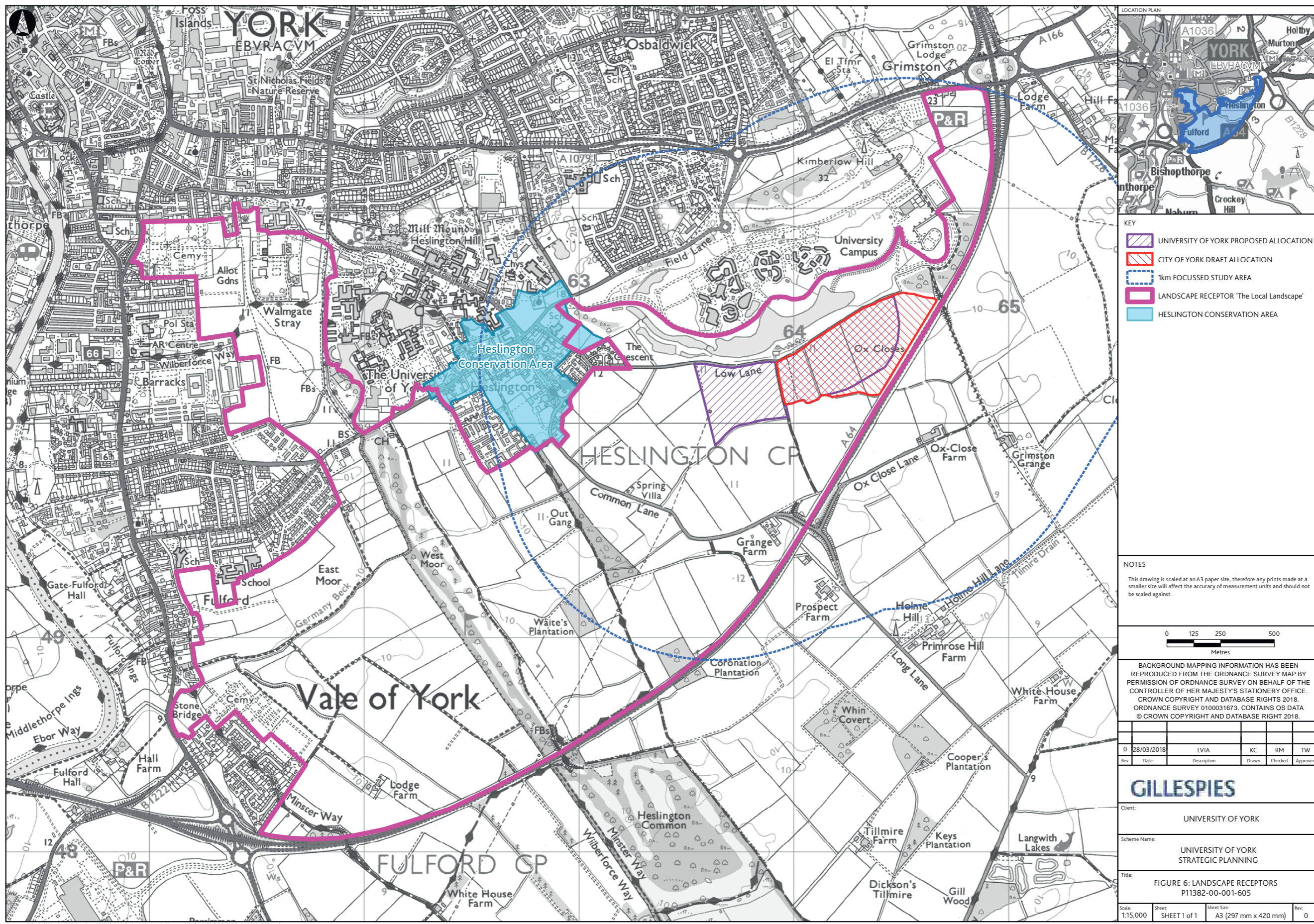


FIG 7: ZTV FOR CITY OF YORK DRAFT ALLOCATION

(FROM MARCH 2018 PUBLICATION DRAFT OF THE LOCAL PLAN)

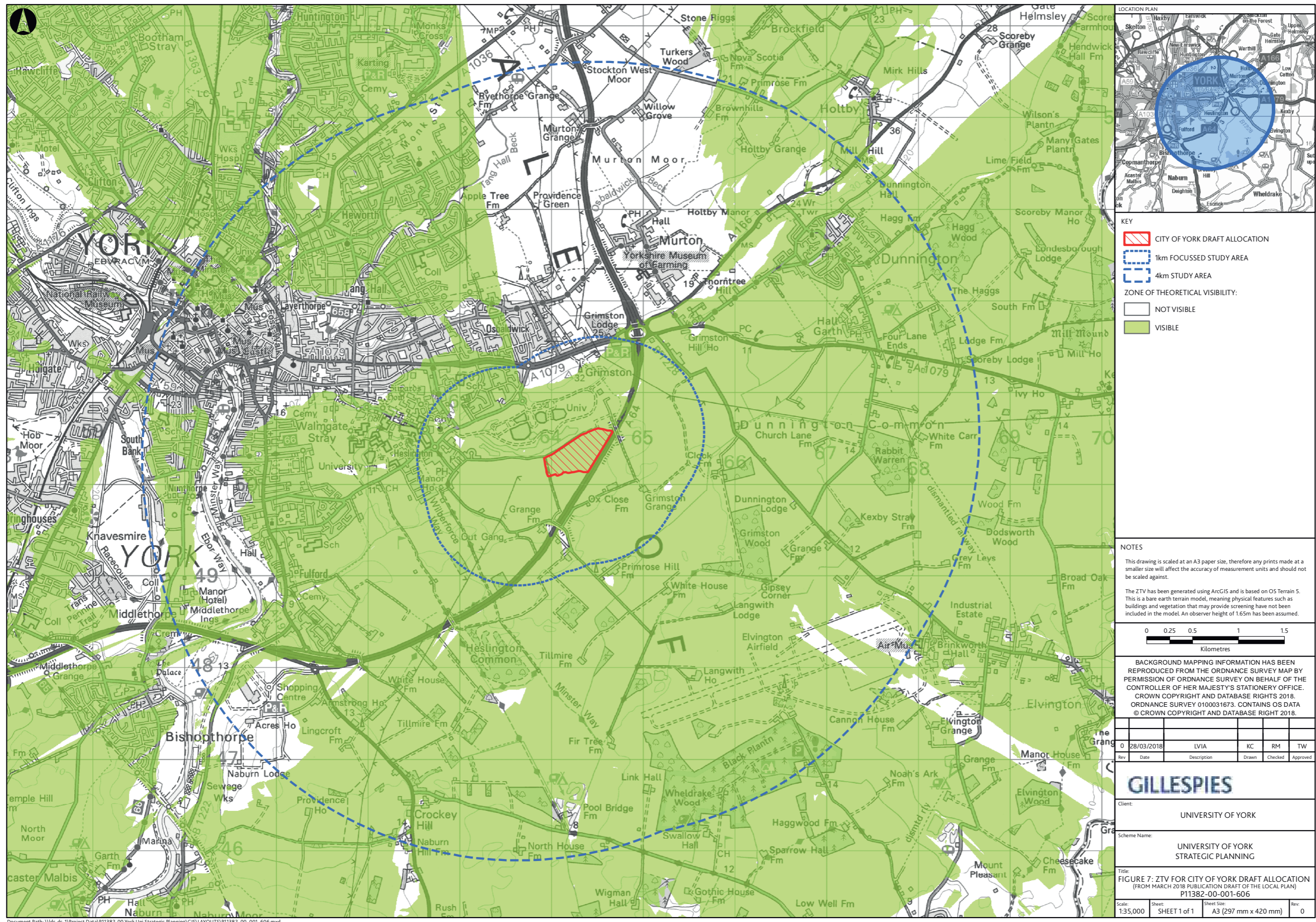


FIG 8: ZTV FOR UNIVERSITY OF YORK PROPOSED ALLOCATION

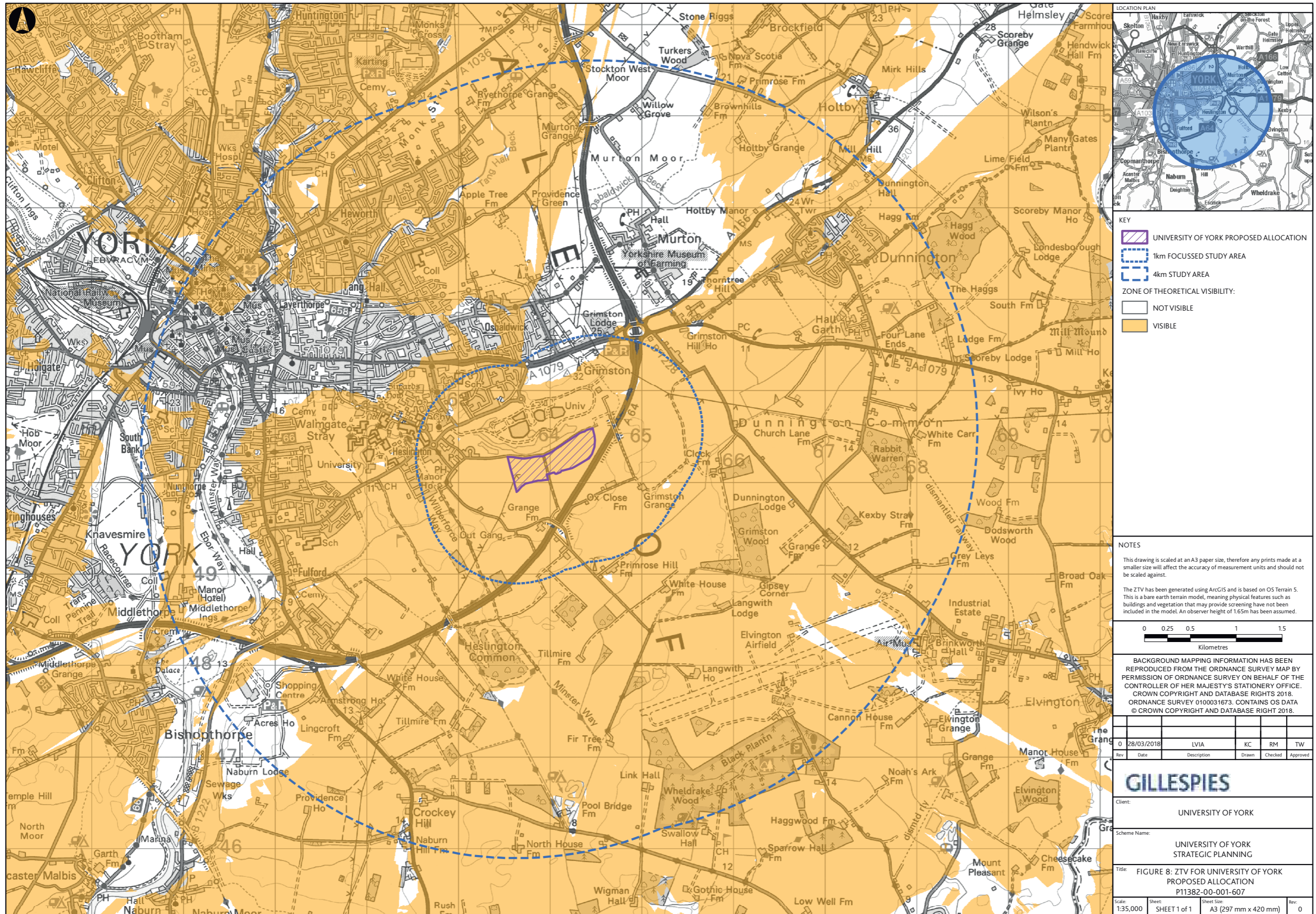


FIG 9: VISUAL RECEPTORS

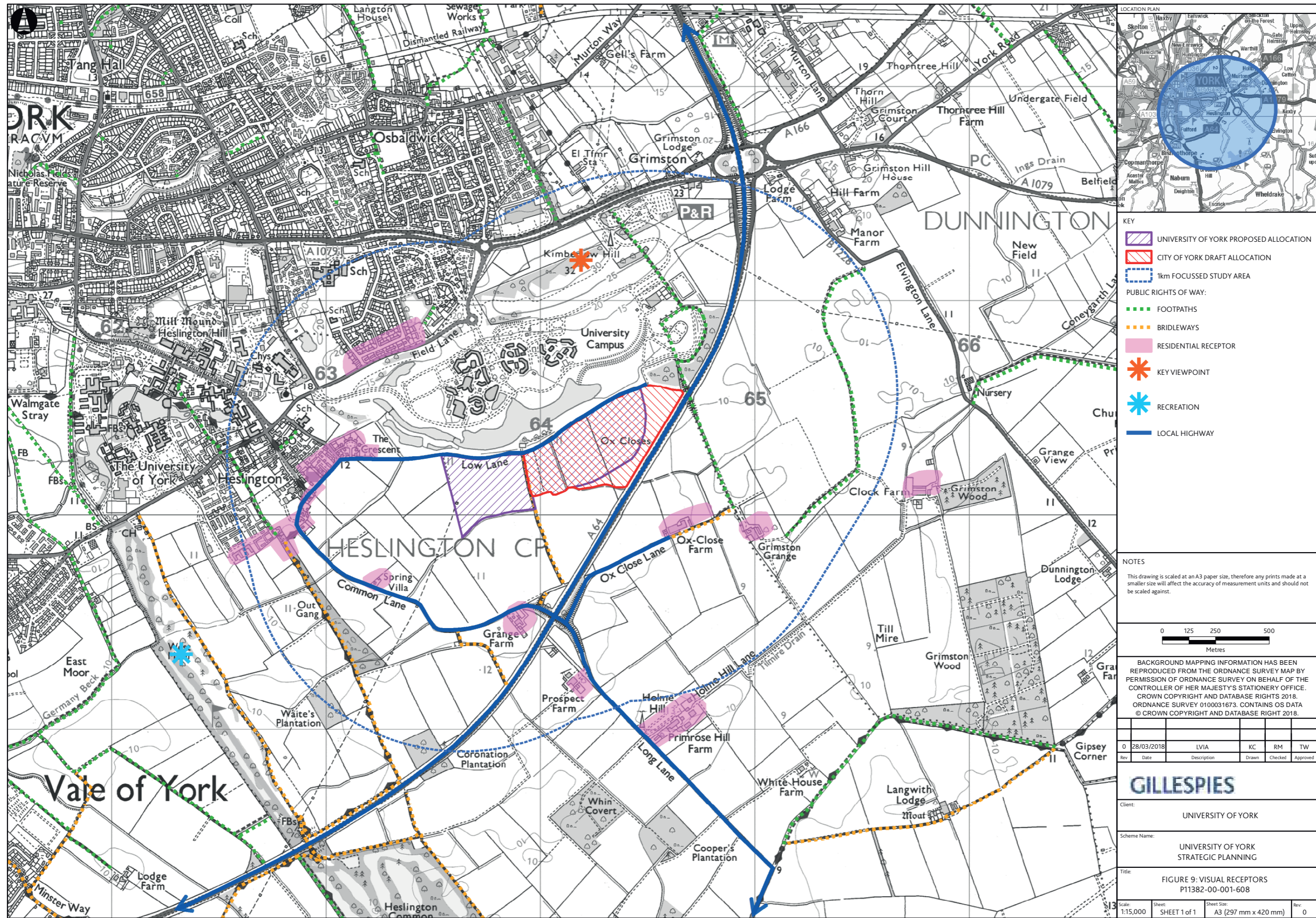


FIG 10: LANDSCAPE BUFFER



Document Path: \\lds-dc-1\Project Data\P11382-00 York Uni Strategic Planning\GIS\LAYOUTS\P11382_00_001_609.mxd

FIG 11: LOCATION OF VIEWPOINTS



VIEWPOINTS

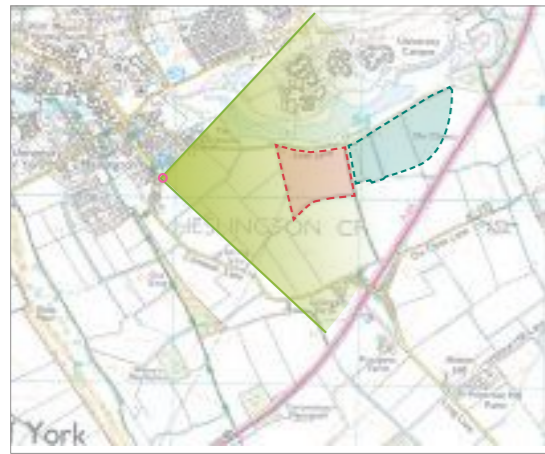
Seventeen viewpoints have been selected to illustrate the visibility of the Proposed Development from within the Study Area. The viewpoints are representative of views from a range of receptors, distances and directions.

PHOTOGRAPHY ASSUMPTIONS, LIMITATIONS AND TECHNICAL INFORMATION

- These viewpoint photograph panoramas have been produced according to the guidelines laid out by the Landscape Institute in their Advice Note of 01/11 Use of Photography and Photomontage in Landscape and Visual Assessment
- Photographs were taken towards the Proposed Development site from publicly accessible areas and cameras set at a standard viewing height of 1.5m.
- All photography was taken on site by Gillespies on 21st March 2018 using a Canon EOS 6D Digital SLR Camera with approx. 20.2 effective megapixels and a Canon 50mm lens.
- The panoramic views are formed from a number of separate images taken in sequence and stitched together using Adobe Photoshop software using the automate - photomerge tool (Reposition layout).
- Photographs shown are scaled and should be viewed from a distance of 300mm on A2. Due to image scaling and page formatting necessary within this document, accuracy in this respect is not guaranteed in reproduction.
- Photographic images alone cannot provide the visual experience that a human observer would receive in the field and should therefore be considered an aide-mémoire: detailed assessment and considered judgements can only be made on the basis of site inspection.

VIEWPOINT 01: FIG 12.1: HESLINGTON CONSERVATION AREA

VIEWPOINT LOCATION OS MAP



VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.943324, -1.042559
Approx Elevation	10.2m AOD
Direction of View	86° ENE
Dist. to Development	Approx 645 m
Time / Date	13.27 / March 21, 2018
Weather	Sunny with scattered cloud
Visibility	Good

VIEWPOINT SITUATION



VIEWPOINT CONTEXT

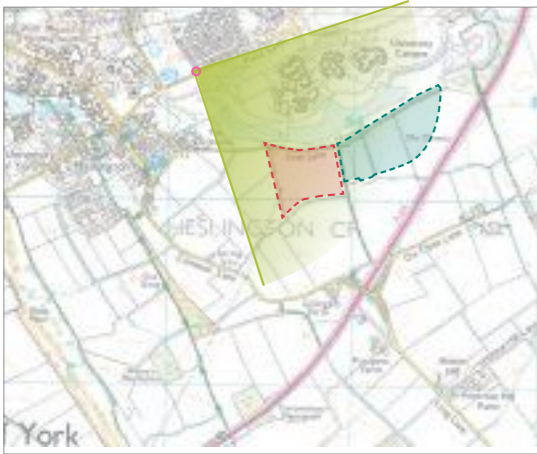


PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 02: FIG 12.2: FIELD LANE

VIEWPOINT LOCATION OS MAP



VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.948369, -1.039186
Approx Elevation	14.8m AOD
Direction of View	140° SE
Dist. to Development	Approx 620m
Time / Date	13:10 / March 21, 2018
Weather	Sunny with scattered cloud
Visibility	Good

VIEWPOINT SITUATION



VIEWPOINT CONTEXT



PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 03: FIG 12.3: LOW LANE

VIEWPOINT LOCATION OS MAP



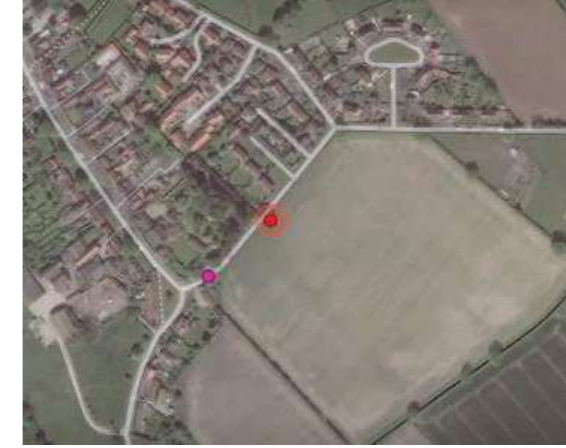
VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.943796, -1.041668
Approx Elevation	16.7m AOD
Direction of View	105° SE
Dist. to Development	Approx 610m
Time / Date	14:22 / March 26, 2018
Weather	Sunny with scattered cloud
Visibility	Good

VIEWPOINT SITUATION



VIEWPOINT CONTEXT



PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 04A:

FIG 12.4A: LOW LANE FOOTPATH INTERSECTION - PANORAMA PART 1

VIEWPOINT LOCATION OS MAP



VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.944659, -1.027674
Approx Elevation	10.2m AOD
Direction of View	105° ESE
Dist. to Development	0m (on site)
Time / Date	13:56 / March 21, 2018
Weather	Sunny with scattered cloud
Visibility	Good

VIEWPOINT SITUATION



VIEWPOINT CONTEXT



PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



EXISTING TRACK

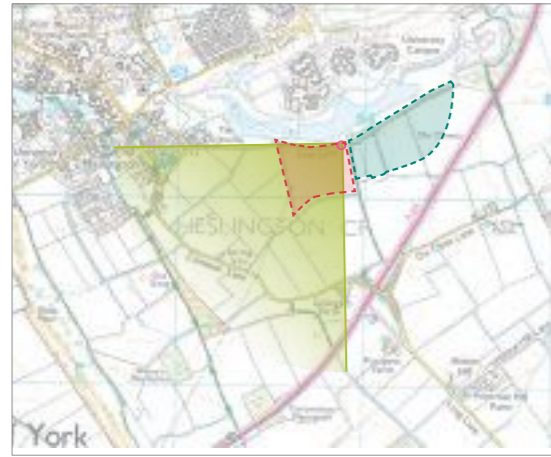


AREA A

VIEWPOINT 04B:

FIG 12.4B: LOW LANE FOOTPATH INTERSECTION - PANORAMA PART 2

VIEWPOINT LOCATION OS MAP



VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.944659, -1.027674
Approx Elevation	10.2m AOD
Direction of View	225° SW
Distance to Development	0m (on site)
Time / Date	13:56 / March 21, 2018
Weather / Visibility	Sunny with scattered cloud / Good

VIEWPOINT SITUATION



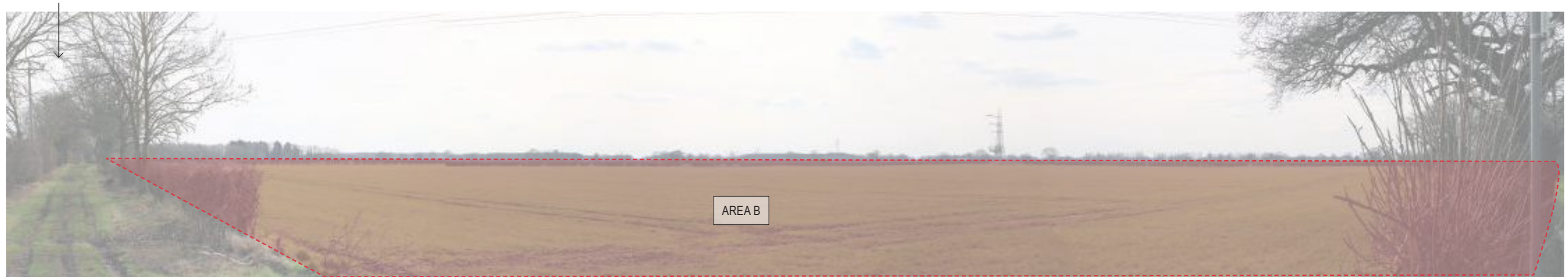
VIEWPOINT CONTEXT



PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



EXISTING FOOTPATH



VIEWPOINT 05A:

FIG 12.5A: LOW LANE/FOOTPATH - PANORAMA PART 1

VIEWPOINT LOCATION OS MAP



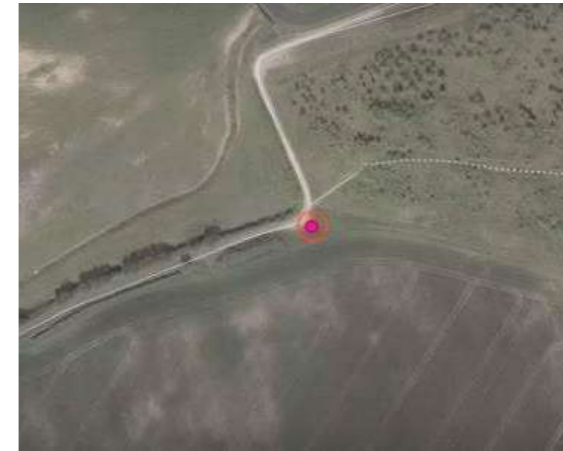
VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.947517, -1.018739
Approx Elevation	12.5m AOD
Direction of View	200° SSW
Dist. to Development	Approx 5m
Time / Date	11:51 / 18th Jan 2017
Weather	Sunny with scattered cloud
Visibility	Moderate

VIEWPOINT SITUATION



VIEWPOINT CONTEXT



PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 05B:

FIG 12.5B: LOW LANE/FOOTPATH - PANORAMA PART 2

VIEWPOINT LOCATION OS MAP



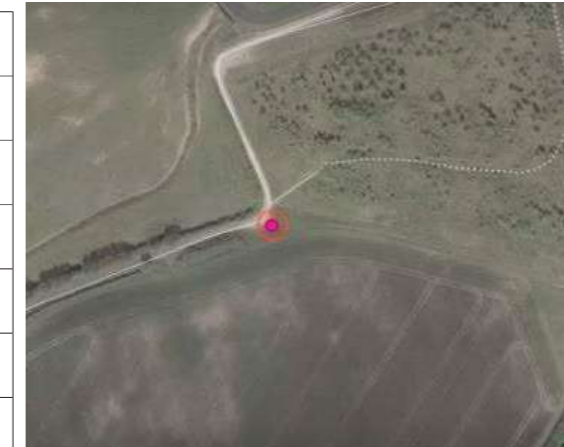
VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.947517, -1.018739
Approx Elevation	12.5m AOD
Direction of View	240° WSW
Dist. to Development	Approx 5m
Time / Date	11:51 / 18th Jan 2017
Weather	Sunny with scattered cloud
Visibility	Moderate

VIEWPOINT SITUATION



VIEWPOINT CONTEXT



PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 06A: FIG 12.6A: TRIG POINT - PANORAMA PART 1

VIEWPOINT LOCATION OS MAP



VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.952459, -1.023199
Approx Elevation	35.2m AOD
Direction of View	170° SE
Dist. to Development	Approx 630m
Time / Date	12:42 / March 21, 2018
Weather	Clear
Visibility	Good

VIEWPOINT SITUATION



VIEWPOINT CONTEXT



PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 06B: FIG 12.6B: TRIG POINT - PANORAMA PART 2

VIEWPOINT LOCATION OS MAP



VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.952459, -1.023199
Approx Elevation	35.2m AOD
Direction of View	265° SE
Dist. to Development	Approx 630m
Time / Date	12:42 / March 21, 2018
Weather	Clear
Visibility	Good

VIEWPOINT SITUATION



VIEWPOINT CONTEXT



PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 07: FIG 12.7: FROM PROW CROSSING BRIDGE

VIEWPOINT LOCATION OS MAP



VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.947300, -1.015881
Approx Elevation	16.7m
Direction of View	220° SSW
Dist. to Development	Approx 250m
Time / Date	11:17 / March 21, 2018
Weather	Clear
Visibility	Good

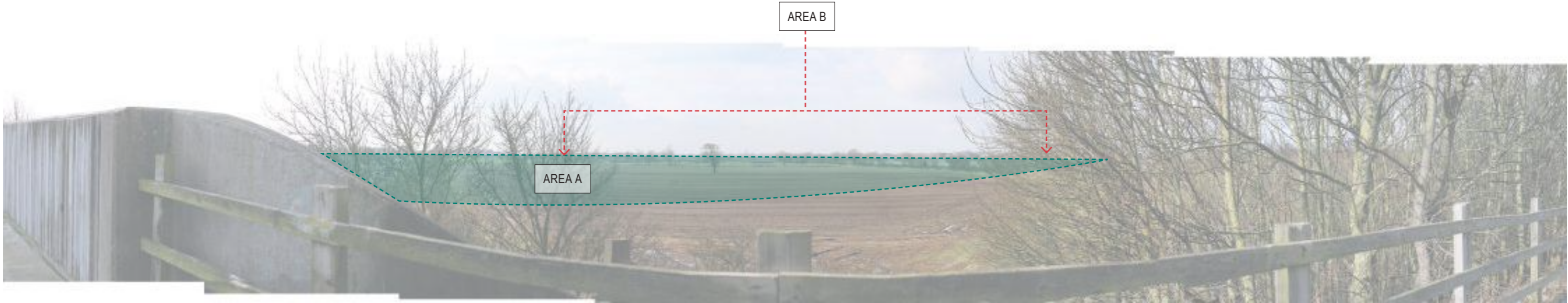
VIEWPOINT SITUATION



VIEWPOINT CONTEXT



PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 08: FIG 12.8: A64 LAYBY (SOUTHBOUND CARRIAGEWAY)

VIEWPOINT LOCATION OS MAP



VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.945565, -1.017204
Approx Elevation	19.7m
Direction of View	275° WNW
Dist to Development	Approx 100m
Time / Date	16:34 / March 21, 2018
Weather	Overcast / light rain
Visibility	Moderate

VIEWPOINT SITUATION



VIEWPOINT CONTEXT



PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 09: FIG 12.9A: FOOTPATH (PROW 7/6/10) - PANORAMA PART 1

VIEWPOINT LOCATION OS MAP



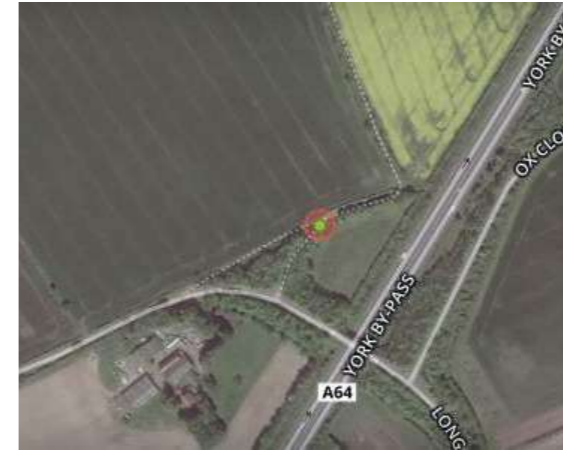
VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.938921, -1.026104
Approx Elevation	9.8m AOD
Direction of View	340° NNW
Dist to Development	Approx 375m
Time / Date	14:26 / March 26, 201
Weather	Sunny with scattered cloud
Visibility	Good

VIEWPOINT SITUATION



VIEWPOINT CONTEXT



PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 09: FIG 12.9B: FOOTPATH (PROW 7/6/10) - PANORAMA PART 2

VIEWPOINT LOCATION OS MAP



VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.938921, -1.026104
Approx Elevation	9.8m AOD
Direction of View	340° NNW
Dist to Development	Approx 375m
Time / Date	14:26 / March 26, 2011
Weather	Sunny with scattered cloud
Visibility	Good

VIEWPOINT SITUATION



VIEWPOINT CONTEXT

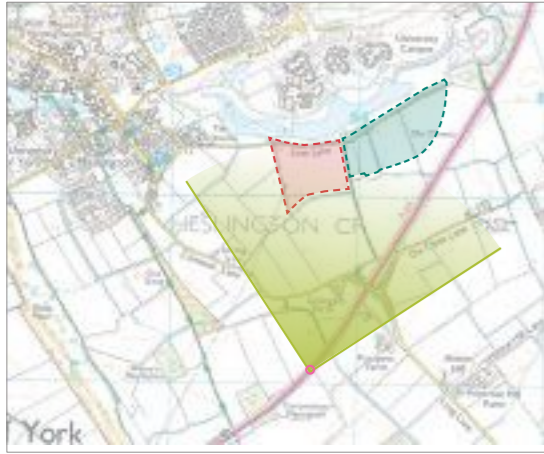


PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 10: FIG 12.10: A64 LAYBY (NORTHBOUND)

VIEWPOINT LOCATION OS MAP



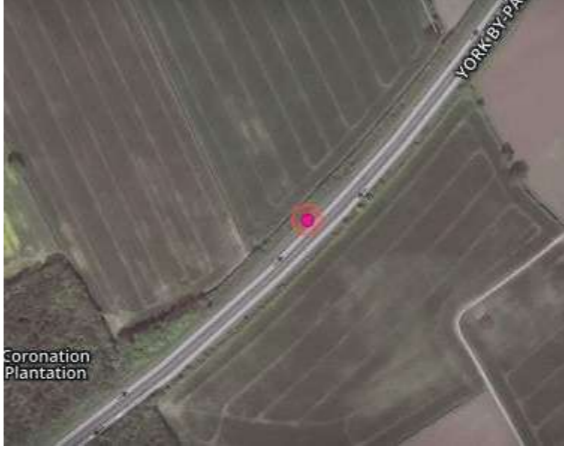
VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.933638, -1.031038
Approx Elevation	13.8m AOD
Direction of View	30° NNE
Dist to Development	Approx 135m
Time / Date	10:04 / March 21, 2018
Weather	Sunny with scattered cloud
Visibility	Good

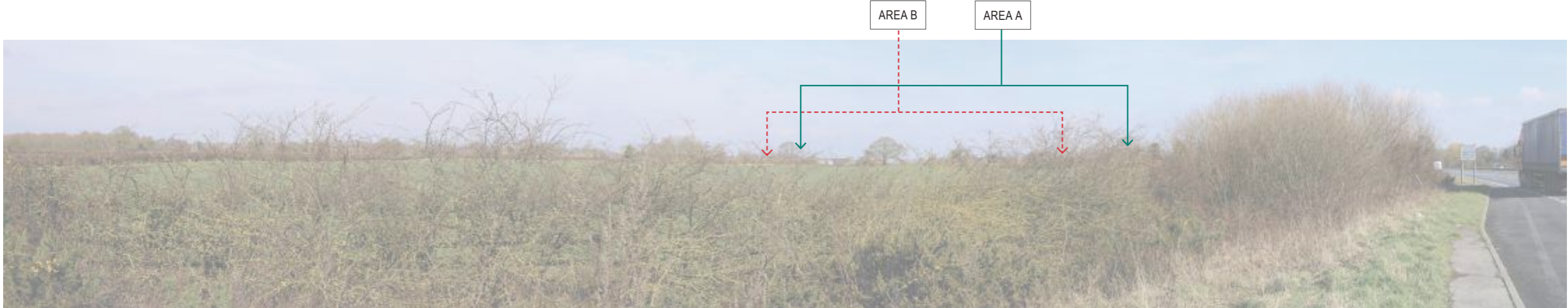
VIEWPOINT SITUATION



VIEWPOINT CONTEXT

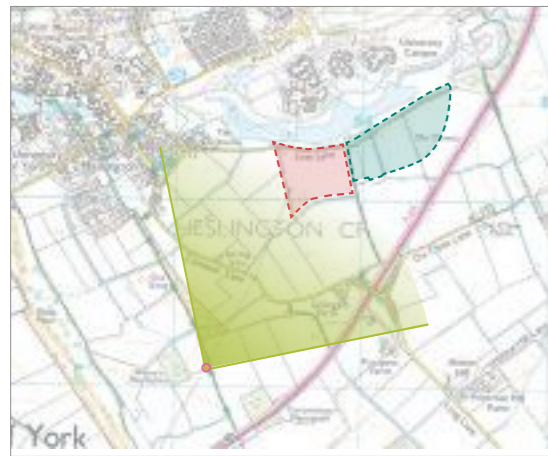


PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 11: FIG 12.11. FOOTPATH (PROW 7/3/10)

VIEWPOINT LOCATION OS MAP



VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.934218, -1.038879
Approx Elevation	10.0m AOD
Direction of View	30° NNE
Dist to Development	Approx 900m
Time / Date	14:57 / March 21, 2018
Weather	Clear
Visibility	Good

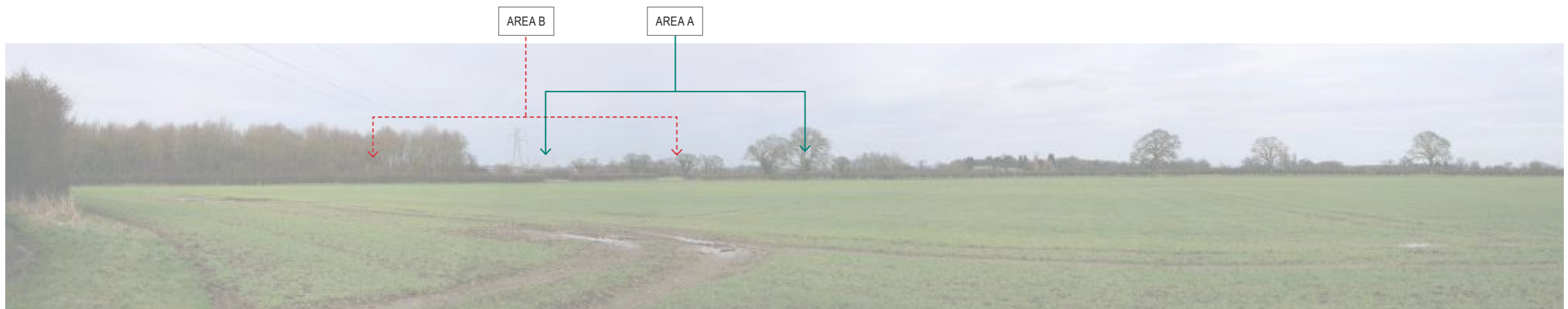
VIEWPOINT SITUATION



VIEWPOINT CONTEXT

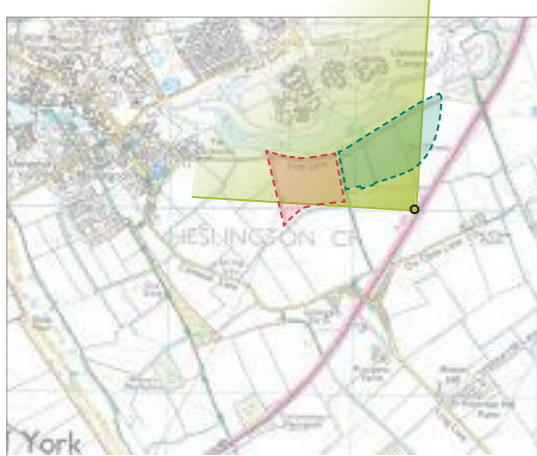


PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)

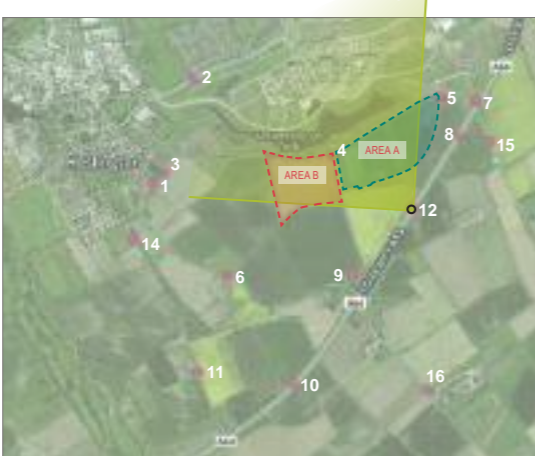


VIEWPOINT 12: FIG 12.12: A64 LAYBY (NORTHBOUND)

VIEWPOINT LOCATION OS MAP



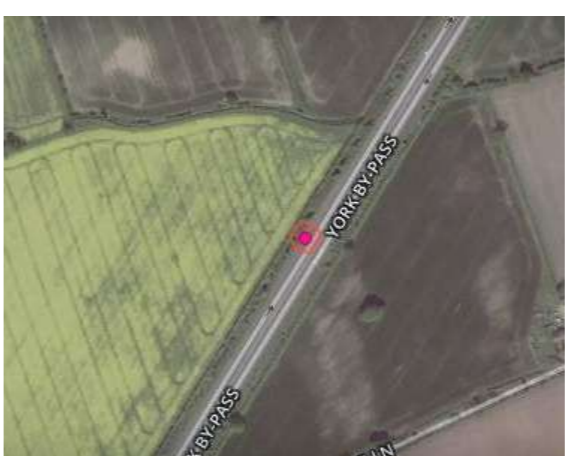
VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.942202, -1.021224
Approx Elevation	11m AOD
Direction of View	340° NNW
Dist to Development	Approx 100m
Time / Date	10:44 / March 21, 2018
Weather	Clear
Visibility	Good

VIEWPOINT SITUATION



VIEWPOINT CONTEXT

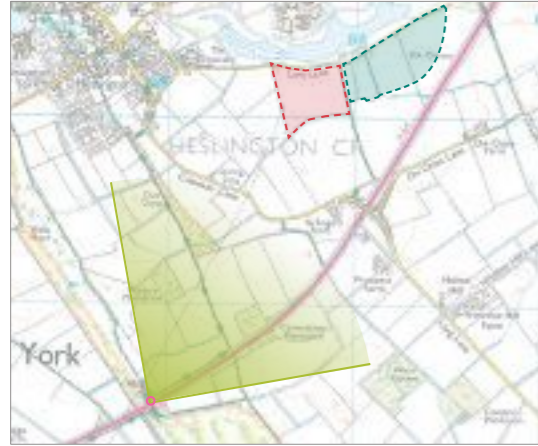


PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 13: FIG 12.13: PEDESTRIAN BRIDGE

VIEWPOINT LOCATION OS MAP



VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.928342, -1.043074
Approx Elevation	18.6m AOD
Direction of View	36° NE
Dist to Development	Approx 1.6km
Time / Date	15:22 / March 21, 2018
Weather	Precipitation
Visibility	Moderate

VIEWPOINT SITUATION



VIEWPOINT CONTEXT

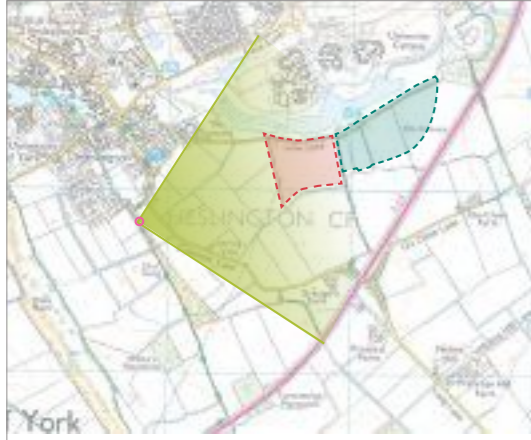


PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 14: FIG 12.14: FOOTPATH (PROW 7/3/10)

VIEWPOINT LOCATION OS MAP



VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.940660, -1.044267
Approx Elevation	11.3m AOD
Direction of View	45° NE
Dist to Development	Approx 800m
Time / Date	16:17 / March 21, 2018
Weather	Precipitation
Visibility	Moderate

VIEWPOINT SITUATION



VIEWPOINT CONTEXT

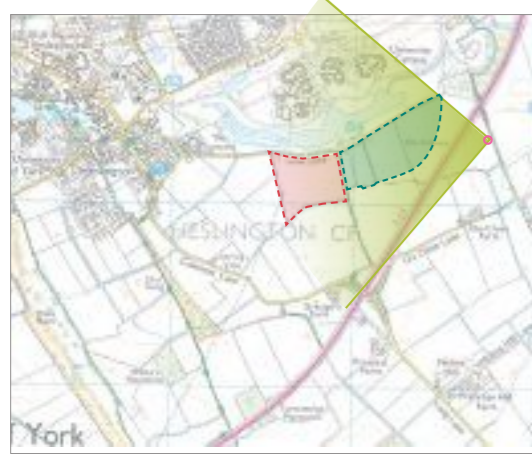


PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 15: FIG 12.15: FOOTPATH (PROW OFF A64)

VIEWPOINT LOCATION OS MAP



VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.945331, -1.014751
Approx Elevation	12.1m AOD
Direction of View	285° WNW
Dist to Development	Approx 260m
Time / Date	11:29 / March 21, 2018
Weather	Sunny with scattered showers
Visibility	Good

VIEWPOINT SITUATION



VIEWPOINT CONTEXT

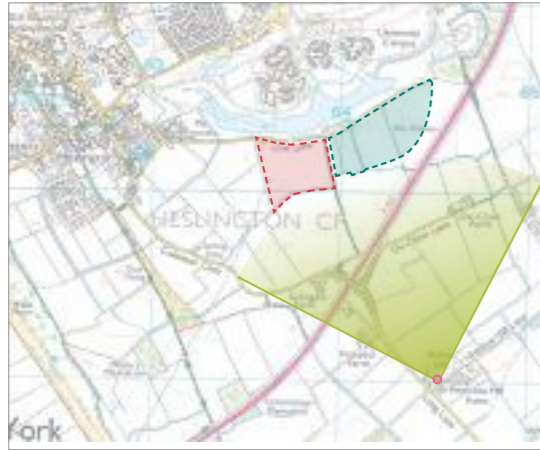


PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 16: FIG 12.16: FOOTPATH (PROW 7/9/10)

VIEWPOINT LOCATION OS MAP



VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.933338, -1.019987
Approx Elevation	8.0m AOD
Direction of View	340° NNW
Dist to Development	APPROX 1.1KM
Time / Date	16:03 / March 21, 2018
Weather	Precipitation
Visibility	Moderate

VIEWPOINT SITUATION



VIEWPOINT CONTEXT



PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)



VIEWPOINT 17: FIG 12.17: COMMON LANE, NEAR SPRINGFIELD FARM

VIEWPOINT LOCATION OS MAP



VIEWPOINT LOCATION AERIAL PHOTO



LOCATION DETAILS

Latitude, Longitude	53.938870, -1.036497
Approx Elevation	6.9m AOD
Direction of View	33° NNE
Dist to Development	Approx 410m
Time / Date	14:15 / March 21, 2018
Weather	Clear
Visibility	Good

VIEWPOINT SITUATION



VIEWPOINT CONTEXT



PHOTOGRAPHS OF EXISTING LANDSCAPE FROM VIEWPOINT (90° FIELD OF VIEW)





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GILLESPIES <small>LANDSCAPE ARCHITECTS & PLANNERS</small>		Project Title	Document Title		Client
		LVA of Proposed Extension Allocation for Campus East, University of York	Landscape and Visual Assessment P11382-00-700		O'Neil Associates
Rev.	Date	Detail	Made By	Checked By	Approved By
00	23.03.18	Initial issue	RM	TW	TW
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02	29.03.18	Second draft	RM	SG	TW
03	03.04.18	Third draft	RM	TW	TW

**OUTLINE LANDSCAPE & VISUAL APPRAISAL OF PROPOSED EXTENSION ALLOCATIONS
WITHIN THE CITY OF YORK LOCAL PLAN FOR CAMPUS EAST, UNIVERSITY OF YORK**

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2. Methodology
3. Overview of the design approach
4. Landscape and visual baseline
5. Sensitivity of landscape and visual receptors
6. Assessment of the likely landscape and visual effects of the proposed development
7. Summary of key potential landscape and visual effects of both allocations and differences in landscape and visual effects between the two allocations

1.0 INTRODUCTION

1.1 Purpose

The purpose of this report is to compare the University of York Proposed Allocation against the City of York Draft Allocation (from March 2018 publication draft of the Local Plan) in terms of landscape and visual effects.

The aims of this report are to:

- Compare the potential landscape and visual effects of development on each allocation;
- Identify opportunities for each allocation in terms of creating a new landscape structure within which new development is set;
- Compare the ability of development on both allocations to create a defensible Green Belt boundary; and
- Summarise the ability of the landscape to accommodate the larger allocation in comparison to that promoted by the Council.

1.2 Report structure

The report is set out as follows:

- Methodology for the appraisal;
- Design approach;
- The landscape and visual baseline (including the identification of receptors and their value);
- The sensitivity of landscape and visual receptors to the proposed development;
- Assessment magnitude and significance of likely landscape and visual effects; and
- Summary and conclusions: key landscape and visual effects of both allocations and differences in potential effect between the allocations.

2.0 METHODOLOGY

2.1 Approach

This landscape and visual assessment has been undertaken in accordance with the Guidelines for Landscape and Visual Impact Assessment Third Edition¹ (GLVIA3). It has involved desk-study, fieldwork observation, photography and subjective professional judgement by two Chartered Members of the Landscape Institute.

The principal aspects considered within the assessment are landscape effects and visual effects, which are related but different concepts:

- Landscape effects are the effects on the landscape as a resource, including the constituent physical elements of the landscape as well as its specific aesthetic or perceptual qualities, the character of the landscape in different areas and any special interests such as designations or special qualities; and
- Visual effects are the effects on specific views and on the general visual amenity² experienced by people at different places.

In response to comments by Historic England a key consideration of the assessment was the need to assess the effects on key views towards the City centre from the A64 as defined in the City of York Heritage Topic Paper, June 2013.

The process for the landscape and visual assessment is as follows:

- Identification and evaluation of the baseline landscape and visual context for each site;
- Review of the development proposal and identification of potential sources of effect;
- Prediction of landscape and visual effects and the appraisal of their significance; and
- Mitigation measures and the identification of residual effects.

2.2 Defining the study area

Due to the scale of the proposed development and the lack of perceptibility of the site from the wider area, it is unlikely that any significant effects would be identified from further afield than 1km and this is the area adopted for the detailed assessment. To ensure however that any potential effects on the wider landscape and the historic setting of the City of York are identified, a more high level overview assessment has been undertaken from a distance of up to 4km from the site.

The two study areas are shown on **Figure 1: Study Area** in Appendix 1.

2.3 Landscape and Visual Baseline

The initial step in this LVIA was to establish the baseline landscape and visual conditions in each of the allocation sites. This information provides the baseline against which the landscape and visual effects are assessed. The landscape and visual baseline are described separately:

¹ Landscape Institute and Institute of Environmental Management and Assessment (2013), Guidelines for Landscape and Visual Impact Assessment

² Visual amenity is the overall pleasantness of the views people enjoy of their surroundings.

- The landscape baseline identifies and records the character of the landscape and the elements, features and aesthetic and perceptual factors that contribute to it. It also establishes the value³ attached to the landscape; and
- The visual baseline establishes the area in which the development may be visible, the different groups of people who may experience views of the development, the viewpoints where they would be affected and the nature of views at those points.

2.4 Identification and Assessment of Effects

The assessment of landscape and visual effects is based on a combination of the value of the receptor, its sensitivity to the type of development proposed and the predicted magnitude of change on each landscape or visual receptor.

The sensitivity of landscape and visual receptors is made up of judgements about the susceptibility of the receptor to the type of change arising from the proposed development and the value attached to the landscape or view under consideration (as defined by the baseline study). Susceptibility is defined as the ability of a defined landscape or visual receptor to accommodate the proposed development without undue negative consequences.

Assessment of the likely level and significance of landscape or visual effects requires the application of professional judgement to weigh the sensitivity of the landscape or visual receptors with the magnitude of predicted change.

For the purpose of this assessment, potential effects have been categorised as follows:

- Negligible – no detectable change to the environment;
- Minor – a detectable change to the environment;
- Moderate – a material but non-fundamental change to the environment; and
- Major – a fundamental change to the environment.

Any effect identified as moderate or above is considered significant for the purposes of this assessment.

Predicted effects can be adverse or beneficial. The design and appearance of the development and how well it integrates within the surrounding landscape can influence the nature of the effects.

2.5 Mitigation

A design approach and landscape design principles have been proposed for both allocation sites (see section 3). The aim of these is to integrate the proposed development into the wider landscape, mitigate any adverse effects and create a new, strong dynamic - and context appropriate - landscape structure. These were taken into account when undertaking the assessment.

2.6 Presentation of Images and Graphic Techniques

Viewpoint photographs have been taken with a fixed focal length lens (effectively 50 mm) on a digital SLR camera to give an angle of view similar to that of the human eye. Photographs have been taken in clear weather conditions that were as close to ideal as possible throughout the

³ Value in this instance means demonstrable features that elevate it above the ordinary.

duration of the study. Due to the timing of the representation, photographs have been taken in the early spring / late winter which gives a close to 'worst case' scenario.

On the viewpoint photographs included as part of the assessment, the location and indicative extent of the two allocation sites has been identified where possible.

3.0 DESIGN APPROACH

3.1 Design Principles

The design approach adopted for both allocation sites seeks to provide a high quality parkland setting to the new campus buildings. This will help integrate development into the wider landscape, reduce any adverse visual effects and reinforce the landscape structure of the adjoining farmland.

The key design principles for development within the University of York Proposed Allocation site are:

- Green wedges running through the site (which reflect the green wedges on the Heslington East Campus);
- Avenues - a tree-lined access route to the campus;
- Internal wetlands – the creation of ecologically diverse wetlands;
- Lakeside parkway – open space between the northern edge of the proposed development and the established wetlands to the north;
- A strong structure of tree planting to create a parkland setting; and
- Linear woodland around much of the periphery.

3.2 Green belt boundaries

Development on the City of York Draft Allocation site allows for the definition of strong green belt boundaries on the west, south and east sides.

Development on the University of York Proposed Allocation site allows for the definition of strong green belt boundaries on the south and east sides. It would not be possible to establish a strong boundary on the western edge as this land is not owned by the University.

3.3 Landscape buffer

The landscape strategy for the buffer between the allocation site's southern and eastern boundaries and the A64 looks to create a landscape which more strongly reflects the key characteristics of the wider LCA. This includes:

- Maintaining agricultural use where possible;
- Strengthening existing field boundaries – planting up gaps in hedgerows and planting hedgerow trees;
- Planting new hedgerows to reduce the size of the arable fields;
- Planting a linear woodland belt along the drainage ditch; and
- Woodland planting (with a mosaic of scrub and grasslands) in the area where the edge of the allocation site lies closest to the A64.

4.0 LANDSCAPE AND VISUAL BASELINE

4.1 Local context

The two allocation sites are located in an area of flat arable landscape to the south-east of the city of York. Both sites are bordered to the north by Low Lane and the existing University of York Campus East. The two allocations are shown on **Figure 1: Study Area** in Appendix 1.

The local context for the detailed study area is shown on **Figure 3: Detailed Study Area Context in Appendix 1**. It includes the existing University Campus at Heslington and Heslington East, the Heslington Conservation Area, the A64 and the agricultural landscape between the existing edge of York and the A64.

4.2 Designations in the wider study area

Designations within the wider study area are shown on **Figure 2: Designations in the Study Area in Appendix 1**.

There are no international, national or local landscape designations within the study area (such as National Parks, Areas of Outstanding National Beauty and Special Landscape Areas).

Thirteen Conservation Areas are located within the 4km study area and help to contribute to local landscape character. Of these only Heslington Conservation Area would potentially be affected by the development on either allocation site.

York Central Historic Core Conservation Area has also been considered in this appraisal, not because development on either allocation site would have any landscape or visual impact on it, but because views towards it are considered to be a key characteristic of the setting of York. All other Conservation Areas have been scoped out of the assessment.

Heslington Conservation Area

Heslington Conservation Area covers an area of 31.29ha and is centered around Heslington Hall grade II* Listed Building. The Conservation Area is bordered by the University of York Campus West to the north, the parkland landscape associated with Campus East to the east and further built development to the west. Open fields and a mid-twentieth century housing development define the southern boundary of the Conservation Area. Heslington Conservation Area Appraisal summarises the key characteristic of the Conservation Area as being, 'a *planned village constructed along two roads within a rural setting*'.

York Central Historic Core Conservation Area

The central historic core of York is a unique and nationally valued area. The richness of the tangible layers of history in the centre of York gives it a strong sense of identity and place. The six principle characteristics which have been defined for York Central Historic Core which result in its distinct identity are:

- Strong Urban Form;
- Compactness;
- Landmark Monuments;
- Architectural Character;
- Archaeological Complexity; and
- Landscape and Setting.

The York Central Historic Core Conservation Area Appraisal identifies long distance, key views and local views towards the City's historic core. None of the views identified are from the direction of the allocation sites.

4.3 Landform and drainage

The landform of the 4km study area is shown on **Figure 4: Landform and Drainage in Appendix 1**.

The landscape of the wider study area is a low lying, mainly flat landscape with glacial moraines providing subtle and local topographic variations. There are a number of small streams and drainage channels which link to the River Derwent to the east.

4.4 Landscape character

Locations of the character areas identified below are found on **Figure 5: Landscape Character Areas** in Appendix 1.

The character of the study area is covered by the 'North Yorkshire and York Landscape Characterisation Project (North Yorkshire County Council, 2011).

Within this, both allocation sites lie within the '*28 Vale Farmland with Plantation Woodland and Heathland*' Landscape Character Type (LCT).

The key characteristics of this LCT are:

- A patchwork of low lying, predominantly arable fields, often delineated by a network of mature hedgerows and interspersed with patches of regular-shaped mixed and coniferous plantation woodlands;
- Large heathlands are key features on sandy soils;
- Distant visual containment is provided by higher LCTs to the east and west;
- Strong sense of openness throughout much of this LCT;
- Scattered settlement pattern of towns, villages and farmsteads within the landscape around the main historic City of York (which forms part of the Urban Landscapes Primary Landscape Unit); and
- A network of trunk roads linking the larger settlements and towns.

The landscape around the allocation sites displays some of the above characteristics in that it is a patchwork of low lying, predominantly arable fields, often delineated by a network of mature hedgerows with a strong sense of openness (with some localised enclosure as a result of areas of linear tree planting, particularly along the A64). It is strongly influenced by the urban edge of York and the A64, and contains some typical rural fringe features such as overhead power lines and golf courses.

4.5 The landscape and setting of York

The landscape and setting of the City of York is described in the City of York Heritage Topic Paper (City of York Council, 2013). It is defined as not being of particularly high quality, but its function in providing a rural setting and offering York residents access to the countryside is considered to increase its value. The key features of the landscape and setting of York are described in part as being:

- *'Views in and out:*
 - *Long-distance views of York Minster in low lying relatively flat vale landscape*
 - *Rural edge setting viewed from majority of ring road by way of field margin*
- *Open countryside and green belt:*
 - *A wide variety of different habitats and landscape elements including: Village settings including: assarted land; strip field pattern/ridge and furrow;*

hedgerows; veteran orchards; Long distance uninterrupted recreation routes with cultural significance through countryside.

- *Suburban villages:*
 - *Street trees*
 - *public parks*
 - *large gardens*
 - *'quiet streets'*
 - *pedestrian-friendly environment*
 - *strong community identity*
 - *allotments*
 - *front gardens bound by hedges*

- *Parks and Gardens:*
 - *Registered historic parks and gardens*
 - *Parks for People*
 - *Designed Campus Landscape*
 - *Matrix of accessible parks'*

4.6 The University of York Proposed Allocation site

The University of York Proposed Allocation site comprises four arable fields bordered by low maintained hedgerows (gappy in places) and drainage ditches. There are few trees within the site and a pylon located on its western boundary is a prominent feature. Low Lane, a local lane bordered by a dense hedgerow, runs along the northern boundary of both allocation sites. North of Low Lane, the buildings of the existing Heslington East Campus form a distinctive edge to the rural area. The farmland is reasonably attractive but unremarkable. The tranquility of the farmland is reduced by noise and visual disturbance from passing vehicles on the A64.

The University of York Proposed Allocation site is not considered to exhibit the key features of the landscape setting of York described in para. XX above.

The landscape value of the University of York Proposed Allocation site is considered to be **low**.

4.7 The City of York Draft Allocation site

The City of York Draft Allocation site consists of three medium sized arable fields (one of which is subdivided) bordered in places by low maintained hedgerows (gappy in places) incorporating some mature boundary trees and in places by shallow ditches. Within these fields are some scattered mature trees. On the southern boundary of the western field, a telecommunications tower forms a vertical man-made feature within the landscape. The western extent of this option is defined by Green Lane (Public Right of Way 7/6/10) which is bordered by intermittent hedgerows on either side. North of Low Lane, the buildings of the existing Heslington East Campus a distinctive edge to the rural area. The farmland is reasonably attractive but unexceptional and its tranquility is reduced by noise and visual disturbance from the A64.

The City of York Draft Allocation site is not considered to exhibit the key features of the landscape setting of York described in para. XX above.

The landscape value of the City of York Draft Allocation site is considered to be **low**.

4.8 The local landscape surrounding both allocation options

Rather than considering effects on the entire LCT 28 - *Vale Farmland with Plantation Woodland and Heathland*, this appraisal considers that the local landscape of the area that surrounds the allocations is the landscape area likely to experience significant effects as a result of development.

This area is termed the 'local landscape' and is defined by the existing urban edge of York (the existing Campus East, the edges of Heslington and Fulford) and the A64.

South-west of both allocation sites the farmland arable farmland displays a medium sized field pattern, broken up by small strips of woodland and planting associated with Fulford Golf Course. North west of Fulford Golf Course is Walmgate Stray, a public open greenspace and historic remnant of an area of common grazing land.

Both allocation sites are contained to the south-east by the A64. The raised landform associated with the A64 in the otherwise flat landscape restricts inter-visibility and is both a physical and perceptual barrier. As a result, the landscape south and east of the A64 does not contribute to the character of either allocation site.

The local landscape surrounding the allocation sites is generally open in character. In places the A64 and presence of settlement exerts an influence on character and reduces the tranquility of the rural farmland. A number of vertical elements can be seen throughout the local landscape including the York Science Park Chimney, pylons and a telecommunications tower. The spire of Heslington Parish Church is also a notable landmark.

This is a transitional rural fringe landscape - on the edge of an urban area which exhibits characteristics and elements of that urban area as well as characteristics of the open countryside.

The value of the local landscape is considered to be **low**.

4.9 The setting of Heslington Conservation Area

The Conservation Area has a varied character with Heslington Hall (which became the administrative centre of the University) at its heart. The University Complex is adjoining, with part of the University lying within the Conservation Area. Other buildings in the vicinity of the Hall were gradually converted to suit the University's purpose. The latter half of the twentieth century saw areas of infill development with standard housing layouts and large blocks of student halls of residence. The rural parkland character of the land alongside Field Lane is not only important as the setting for Heslington Church, but also for the Hall. Heslington Lane approaches the village from the open fields and University sports fields which maintain the separate identity of the west side of Heslington from York's suburbs. Main Street also leads from the countryside to the centre of the village, via Common Lane.

The main elements of the character and appearance of the area are:

- Heslington Hall at the centre of the village;
- The heritage of streets, vernacular buildings, trees and open spaces;
- The individual linear qualities of Heslington Lane and Main Street; and
- The rural setting of the south-west outer edge of Main Street. The visual unity of the street itself, in having retained much of its traditional form and building fabric.

From a landscape perspective the value of Heslington Conservation Area is considered to be **medium**.

4.10 The landscape setting of the special character and significance of York

As outlined in detail within the Heritage Statement, development on either allocation option would not affect the setting or character of the historic core of York.

No view of York Minster or other historic building within the City would be affected by development on either of the allocation options.

As a result, effects on the special character and significance of York are 'scoped out' of the appraisal.

4.11 Zone of Theoretical Visibility

The area in which the proposed development may theoretically be visible is called the 'Zone of Theoretical Visibility' (ZTV).

The ZTV was produced using a 3D digital terrain model (DTM) of the surrounding landscape which was generated using OS Terrain 5 topographical data.

The ZTV is based upon 'bare earth' mapping which takes no account of intervening vegetation and built form that would serve to screen, filter and limit views in reality. It is also based upon large-scale mapping and takes no account of localised landform which can also often affect visibility. The ZTV study therefore represents a 'worst case' scenario and was used as a starting point in which to identify and select appropriate viewpoints and the likely areas of visibility of the proposed development.

The ZTVs for the University of York Preferred Allocation have been prepared using the proposed building heights and locations from the masterplan.

4.12 Visibility Overview

The 'bare earth' ZTV is shown on **Figure 7: ZTV for City of York Draft Allocation** and **Figure 8: ZTV for University of York Proposed Allocation at Appendix 1**. The ZTV is extensive as a result of the flat topography of the wider study area but as noted above, does not take into account the screening effect of buildings or vegetation. The following comments incorporate the results of the site visits to confirm actual visibility.

Views from within and immediately surrounding the allocation sites are open and expansive and vertical structures such as pylons and a telecommunications tower in the near distance are prominent. However, because of the flat nature of the landscape and presence of intervening woodland belts and hedgerows low level features including built development recede quickly into the background.

From the north-east of the 1km study area, planted mounds and the A64 on low embankment screen views of the allocation sites. From the east and south-east the allocation sites are substantially screened by the A64 and by intervening vegetation, although there are some views of the upper storeys of the Campus East buildings. Pylons and wood pole overhead lines are prominent in most views from this area.

From the south and south-west, views are generally rural in character, comprising arable fields with isolated mature trees and linear belts of trees. The residential properties of Heslington and the Campus East buildings form peripheral features in views from this area.

North-west of the allocation sites, the settlement of Heslington screens most views. Only properties on the eastern edge of the village have views of the allocation sites and these are partially screened and filtered by tall hedgerows and garden vegetation. Where vegetation permits,

there are open views out over fields towards the A64. A pylon line and other overhead line infrastructure is also present in these views.

From the north, the slightly higher landform of Badger Hill and Kimberlow Hill afford slightly more expansive views down over the existing Heslington East Campus and its surrounding area. They also provide the only views of York Minster and the historic centre of York from within the detailed assessment area. Generally, from this location, the Campus East buildings and intervening vegetation screens most views of the allocation sites.

The ZTV for the City of York Draft Allocation is shown on **Figure 7: ZTV for City of York Draft Allocation** and the ZTV for the University of York Proposed Allocation is shown on **Figure 8: ZTV for University of York Proposed Allocation** in Appendix 1.

These show the maximum theoretical extent of potential visibility for each proposed development. This initially appears to be extensive (primarily due to flat topography). However site visits have confirmed that existing buildings and vegetation would significantly reduce the potential visibility of development on either allocation site. For example, whilst the ZTV shows that both allocations could theoretically be seen from the historic core of York – the intervening buildings and vegetation would screen all views. Similarly whilst the ZTV shows that the University of York Proposed Allocation would theoretically be visible from the north of Osbaldwick, in reality the campus buildings and the buildings within Osbaldwick would screen the proposed development.

In summary, the ZTVs and site visits have determined that development on either of the allocation sites would be an insignificant component of any view beyond 1km.

4.13 Visual receptors

Potential visual receptors or the people who would be affected by changes in their view or visual amenity for both allocation options are shown on **Figure 9: Visual Receptors** in Appendix 1.

The Minster Way is a long distance footpath between the minsters of Beverley and York. Within the study area it runs to the east of the A64 before crossing the A64 near the Selby Road junction to the south-west of the allocation sites. It is not considered that users of this route would experience views of either of the allocation sites. As such, it is scoped-out and not considered as a visual receptor in this appraisal.

The viewpoints from which the allocations have the potential to be seen by these different groups of people and from where the assessment has been undertaken are identified on **Figure 11: Location of Viewpoints** in Appendix 1.

Visual receptors are assessed in terms of the value attached to views at these viewpoints.

The range of visual receptors likely to have been identified within the Study Area includes the following:

Residential

- Residents of Heslington - residents on the edge of Heslington currently have open views of medium to small arable fields bordered by variable strips of vegetation. A pylon line is prominent in these views and traffic on the A64 is also visible. The value of views is considered to be **low-medium**.
- Residents of Heslington East Campus - residents of student accommodation within Goodricke College, Langwith College and Constantine College currently have close range views of university buildings set in an extensive landscaped campus. Residences on the

southern edge of the campus have views across the lake towards the allocation sites. A recently planted hedgerow restricts some views to the south but the arable fields are still visible particularly from the upper storeys. The value of views is considered to be **low-medium**.

- Residents of Scattered Properties - within the agricultural land south of the allocation sites there are a number of scattered farmsteads. These properties are typically surrounded by boundary trees, so views towards the allocation sites are often screened or filtered by vegetation or by associated farm buildings. Where there are more open views, these are typically rural in outlook although pylons and wood pole overhead lines are often present in the view. Passing vehicles on the A64 feature in many of these views. The value of views is considered to be **low-medium**.

Recreational

- Users of Wilberforce Way – this runs to the east before crossing the A64 and turning north to the west of the allocation sites. It is mostly bordered by hedgerows and woodland on either side but views of the surrounding fields can be glimpsed through gaps in the vegetation (see Viewpoints 11 and 14). The value of views is considered to be **low-medium**.
- Visitors to the Heslington Conservation Area – the eastern edge of the Conservation Area affords views across the arable farmland towards the allocation sites. A key long distance view is defined within the Conservation Area Appraisal looking west from the junction of Main Street and Common Lane / Low Lane. This view is illustrated by Viewpoints 1 and 3 in Appendix 1. The open farmland affords long distance views towards the village from the south. The value of views is considered to be **low-medium**.
- Users of Public Right of Way (PRoW) 7/6/10 Green Lane and PRoW 7/6/20 - Green Lane runs between the field outside of the University ownership and the field included in the University Of York Proposed Allocation only (see Viewpoints 04 and 09). PRoW 7/6/20 is a short section of footpath which links to Green Lane. Views from these PRoW are composed of open fields mainly filtered by vegetation. To the north, the university campus and the residential edge of York are key components of the view. The value of views is considered to be **low**.
- Users of PRoW 14/16/30 and PRoW 14/16/40 – these PRoW link and run south-east from the York Sport Village to cross the A64. Views from the footpaths are restricted approaching and crossing the A64 by vegetation and safety barriers, but some elevated views of the surrounding countryside are attainable. South of the A64 views north are restricted by the A64 on low embankment (see viewpoint 7 and 15). The value of views is considered to be **low**.
- Users of PRoW 7/8/10 – This is a short section of footpath running from Common Lane south to the A64. There are open views over the surrounding fields, with long distance views foreshortened by belts of trees. The edge of Heslington and the University campus are visible from Common Lane. The value of views is considered to be **low**.
- Users of PRoW south east of the A64 – From PRoW south of the A64 views north are restricted by the raised A64. The upper storeys of Heslington Campus East are visible above the A64 (see Viewpoint 15). The value of views is considered to be **low-medium**.

- Visitors to Kimberlow Hill – from Kimberlow Hill there are panoramic views of the City of York, including York Minster. To the south the allocation sites are visible in the visual context of the existing university campus and the A64 (see Viewpoint 06). The value of views is considered to be **low-medium**.
- Users of Fulford Golf Course – the boundaries of Fulford Golf Course are heavily vegetated, limiting for the most part views east towards the allocation sites. The value of views is considered to be **low-medium**.

Road users

- Drivers and passengers on the A64 – views from the A64 between Coronation Plantation and the pedestrian bridge south of York Sports Village (where there is the potential for the allocation sites to be visible) are predominantly of arable fields with planted edges. Pylons and wood pole overhead lines are often prominent and the settlement edge of York is visible to the west. It is not possible to see the historic core of York from this section of the A64. The southern section of the A64 in this location is more enclosed by vegetation which limits the extent of views, whereas to the north there are open views to the west (see viewpoints 8, 10 and 12). The value of views is considered to be **low**.
- Drivers and passengers on Common Lane – hedgerows to either side of Common Lane restrict some views of the surrounding open fields in places. Where views are available they comprise flat open fields punctuated with pylons. The A64 is partially visible in many views, as is the residential edge of Heslington along with taller structures such as the York Science Chimney which indicates the proximity of this viewpoint to the urban edge. (see view 17) The value of views is considered to be **low**.
- Drivers and passengers on Low Lane – which runs along the southern edge of Heslington and the northern of the two allocation sites. Views north are mostly restricted by a dense hedgerow, but Heslington Campus East can be seen in filtered views. Views to the south across arable fields are foreshortened by vegetation and the A64 on low embankment (see viewpoint 3 and 4). The value of views is considered to be **low-medium**.
- Drivers and passengers on Field Lane – Field Lane runs along the northern edge of the existing Heslington East Campus. From the western side of the road, the slightly higher elevation permits views across the campus and down towards the allocation sites. Generally, however views are contained by the campus buildings and buildings to the north. The value of views is considered to be **low**.

5.0 THE SENSITIVITY OF LANDSCAPE AND VISUAL RECEPTORS TO THE PROPOSED DEVELOPMENT

5.1 Sensitivity of landscape receptors

The sensitivity of the landscape is a judgement of its susceptibility to the type of change proposed and its value (as defined in the baseline above).

Sensitivity of the landscape within the University of York Proposed Allocation site

The University of York Proposed Allocation is located relatively close to the existing University of York campus so new low-rise campus development would not appear out of place. The landscape is also rural fringe in character (containing urban elements in addition to open countryside) so again development is not considered incongruous. The susceptibility of the site to the type of development proposed is considered to be **medium**.

Combining the assessment of susceptibility (medium) with the assessment of landscape value (low) gives a judgement of **low/ medium sensitivity**.

Sensitivity of the landscape within the City of York Draft Allocation site

The City of York Draft Allocation is located relatively close to the existing University of York campus so low-rise campus development would not appear out of place. The landscape is also rural fringe in nature (containing urban elements in addition to open countryside) so again development is not considered incongruous. The susceptibility of the site to the type of development proposed is considered **medium**.

Combining the assessment of susceptibility (medium) with the assessment of landscape value (low) gives a judgement of **low/ medium sensitivity**.

Sensitivity of the local landscape

The local landscape is arable farmland which has characteristics and features of both the urban and rural environment. It is influenced by proximity to the edge of settlement and the university campus as well as to the A64 and other infrastructure. New low-rise campus development in this location would not appear out of place therefore the susceptibility of the local landscape to the type of development proposed is considered to be **medium**.

Combining the assessment of susceptibility (medium) with the assessment of landscape value (low) gives a judgement of **low/ medium sensitivity**.

Sensitivity of the landscape setting of Heslington Conservation Area

Due to its nature (a residential area albeit with a rich heritage of streets, vernacular buildings, trees and open spaces) and its context (contiguous with existing campus development), the susceptibility of the landscape setting of the Heslington Conservation Area to new housing is considered to be **medium**.

Combining the assessment of susceptibility (medium) with the assessment of landscape value (medium) gives a judgement of **medium sensitivity**.

5.2 Sensitivity of visual receptors

Visual receptors are individuals and/ or defined groups of people whose views or wider visual amenity has the potential to be affected by a proposal. Each visual receptor group is considered in terms of their susceptibility to the changes in views and visual amenity arising from the proposed development, which is then combined with the value attached to the view (defined in the baseline) to determine their sensitivity.

Viewers at residential properties are typically considered to be most susceptible to changes in their rural outlook and as such are classed as high susceptibility receptors. Users of public footpaths are also considered to have high susceptibility as their attention is often primarily focussed on the view which is currently of rural farmland. Visitors to the Conservation Area are considered to have high susceptibility as their attention is also focussed primarily on the visual setting and context of the heritage area.

Vehicle users along the local road network (the A64, Common Lane and Low Lane) are considered to have low susceptibility as drivers/ passengers attention is not primarily focussed on the view.

Combining the assessment of susceptibility with the assessment of view value (in section 3.X) gives the following sensitivities:

Residential receptors

Residents of on the eastern edge of Heslington - a high susceptibility to changes in views and visual amenity, which when combined with a low-medium view value gives a **medium** sensitivity.

Residents of Heslington East Campus - a high susceptibility to changes in views and visual amenity, which when combined with a low-medium view value gives a **medium** sensitivity.

Residents of Scattered Properties to the south and east - a high susceptibility to changes in views and visual amenity, which when combined with a low-medium view value gives a **medium** sensitivity.

Recreational

Users of the Wilberforce Way - a high susceptibility to changes in views and visual amenity, which when combined with a low view value gives a **medium** sensitivity.

Visitors to the Heslington CA - a high susceptibility to changes in views and visual amenity, which when combined with a low-medium view value gives a **medium** sensitivity.

Users of Public Right of Way (PRoW) 7/6/10 Green Lane and PRoW 7/6/20 - a high susceptibility to changes in views and visual amenity, which when combined with a low view value gives a **medium** sensitivity.

Users of PRoW 14/16/30 and PRoW 14/16/40 - a high susceptibility to changes in views and visual amenity, which when combined with a low view value gives a **medium** sensitivity.

Users of PRoW 7/8/10 - a high susceptibility to changes in views and visual amenity, which when combined with a low view value gives a **medium** sensitivity.

Users of PRoW south east of the A64 - a high susceptibility to changes in views and visual amenity combined with a low view value gives a **medium** sensitivity for users of these PRoWs.

Visitors to Kimberlow Hill - a high susceptibility to changes in views and visual amenity, which when combined with a low-medium view value gives a **medium** sensitivity.

Users of Fulford Golf Course - a medium susceptibility to changes in views and visual amenity, which when combined with a low view value gives a **medium** sensitivity.

Road users

Drivers and passengers on the A64 - a low susceptibility to changes in views and visual amenity, which when combined with a low view value gives a **low** sensitivity.

Drivers and passengers on Common Lane - a low susceptibility to changes in views and visual amenity, which when combined with a low view value gives a **low** sensitivity.

Drivers and passengers on Low Lane - a low susceptibility to changes in views and visual amenity, which when combined with a low view value gives a **low** sensitivity.

Drivers and passengers on Field Lane - a low susceptibility to changes in views and visual amenity, which when combined with a low view value gives a **low** sensitivity.

6.0 ASSESSMENT OF THE MAGNITUDE AND SIGNIFICANCE OF LIKELY LANDSCAPE AND VISUAL EFFECTS

6.1 Assessing likely landscape and visual effects

The potential effects of the indicative scheme have been identified by establishing and describing the changes which would result from the different components of the development and the predicted effects on individual landscape or visual receptors. This has taken account both the nature or sensitivity of the receptor (see above) and the nature or magnitude of the change likely to occur.

The scale/ size and geographical extent of likely landscape change depends on the degree to which the character of the landscape would be altered through the removal of existing landscape components or the addition of new components. It also depends on the duration of the change, which in this case is considered long term/ permanent.

The scale/ size and geographical extent of likely visual change depends on the degree to which the view would be altered through the removal of existing landscape components or the addition of new components. It takes into account the scale of change of view with respect to the loss or addition of features and changes in its composition, the degree of contrast or integration of new features with the remaining elements and character, and the nature of the view in terms of the proposed development. It also depends on the duration of the change, which in this case is considered long term/ permanent.

Magnitude of predicted effect is considered at Year 10 (when the landscape structure proposed as part of the primary mitigation strategy has established and matured). It is important to emphasise that the effects identified in the remainder of this report will further reduce in magnitude and therefore significance as the planting continues to mature and gain height beyond 10 years.

6.2 Likely effects of development on the University of York Proposed Allocation site

Effect on the landscape of the allocation site

The landscape of the University of York Proposed Allocation would change from arable farmland with few trees to a low-density, low-rise university campus set within a high quality designed parkland landscape (similar to the current Campus East site). The current pattern of open fields with low hedgerow boundaries would be replaced by a new landscape comprising low rise, low density buildings set within a high quality parkland landscape with new ecologically designed water features and areas of recreational green space. Much of the perimeter of the site would be enclosed by linear woodland belts, which would reduce the scale of the landscape and current sense of openness.

The magnitude of effect is considered to be **low adverse** which when combined with a low-medium sensitivity gives a **minor adverse** effect at Year 10 of operation

Effect on the local landscape

Within the local landscape, the new university campus would appear as an extension to the existing university buildings and would provide a high quality setting to the southern side of the lake. The linear woodland belts and replanted hedgerows and hedgerow trees to the south of the campus would help to integrate the development into the wider landscape. Whilst an area of farmland would be lost, this is considered to be of low/ medium sensitivity as it is influenced by proximity to settlement and contains urban elements such as pylons and communications masts as well as the A64.

The size of the University of York Proposed Allocation is also small in proportion to the size of local landscape – the area defined as the Local Landscape covers 550.15ha, with the University of York Proposed allocation covering 26.43 ha or 4.8% of the area.

At Year 10 magnitude of predicted effect is considered **negligible**, which when combined with a low -medium sensitivity gives a **negligible** effect at Year 10 of operation.

Effect on the landscape setting of Heslington Conservation Area

The distance between the eastern edge of the Conservation Area is 560m to the red line boundary and 650m to the closest proposed buildings. This is considered a sufficient degree of separation to ensure that the open and rural quality of the eastern edge of the Conservation Area would be retained. The relatively low building heights proposed (three storeys) combined with the maturing linear belt of woodland along the western boundary would prevent the proposed development from intruding on the landscape setting of the Conservation Area.

There would be limited effects on views towards the Conservation Area. The Conservation Area appraisal states that views of the Conservation Area are particularly prominent from the A64 – the viewpoints taken as part of this assessment do not support this position as it is difficult to distinguish the Conservation Area from the general skyline elements.

The magnitude of predicted effect is considered **low**, which when combined with the medium sensitivity gives a **minor adverse** effect at Year 10 of operation.

Effects on views from the eastern edge of Heslington and on the Heslington East Campus

Residents on the eastern edge of Heslington and on the Heslington East Campus would have glimpsed and generally oblique views of the new campus development set within a high quality designed parkland landscape. The distance between the eastern edge of the Conservation Area is 560m to the red line boundary and 650m to the closest buildings within the proposed development. This distance, combined with the relatively low building heights proposed (three storeys) and the presence of the maturing linear belt of woodland along the western boundary would reduce the visibility of the proposed development. Even where visible, the new campus development would not be an incongruous new feature within the view and would be in scale with the remaining landscape elements (existing field trees and overhead power lines).

The magnitude of predicted effect is considered **low**, which when combined with the medium sensitivity gives a **minor adverse effect** at Year 10 of operation.

Effects on views from scattered properties to the south and east

Residents living in scattered properties to the south and east would have some glimpsed views of the new campus development, but the majority of the views would be screened and filtered by the intervening vegetation and farm buildings. Where views are available, the new campus buildings would be seen within a maturing landscape setting and in the context of the existing campus buildings, albeit that they would be slightly closer in the view. The development would not appear an incongruous feature.

The magnitude of predicted effect is considered **negligible**, which when combined with the medium sensitivity gives a **negligible effect** at Year 10 of operation.

Effects on views from Wilberforce Way

Most views of the proposed development from Wilberforce Way would be screened by intervening vegetation. Where views are available, the new campus buildings would be seen within a maturing landscape setting and in the context of the existing campus buildings. They would also only be experienced transiently. The development would not appear an incongruous feature.

The magnitude of predicted effect is considered **negligible**, which when combined with the medium sensitivity gives a **negligible effect** at Year 10 of operation.

Effects on views from Heslington Conservation Area

Whilst the proposed development would be visible in the middle distance from the eastern edge of the Conservation Area, the maturing linear woodland belt on the western edge of the development, would help to screen the lower parts of the built development. The relatively low building heights proposed (three storeys) would not result in the development appearing visually intrusive and would be proportional to the height of existing vegetation and vertical infrastructure in the view.

Due to the distance and the screening effects of maturing landscape the magnitude of predicted effect is considered **low**, which when combined with the medium sensitivity gives a **minor adverse effect** at Year 10 of operation.

Effects on views from Public Right of Way (PRoW) 7/6/10 Green Lane and PRoW 7/6/20

New campus development would border both sides of this PRoW and there would be a change in the outlook from an open rural fringe agricultural landscape to a campus development set within a high quality designed parkland landscape. The maturing linear woodland belts around the periphery of the site would provide a substantial degree of screening of the lower parts of the buildings by year 10 and the outlook from the PRoW, although one of developing woodland rather than open fields would remain rural in character.

The magnitude of predicted effect is considered **medium**, which when combined with the medium sensitivity gives a **moderate adverse effect** at Year 10 of operation.

Effects on views from PRoW 14/16/30 and PRoW 14/16/40 Users of PRoW 7/8/10

Users of these routes would have glimpsed and generally oblique views of the new campus buildings set within a landscape parkland setting. The new development would not be an incongruous new feature as the existing campus buildings are already present within the view. It would be in scale with the remaining landscape elements (existing field trees and overhead power lines).

The magnitude of predicted effect is considered **low**, which when combined with the medium sensitivity gives a **minor adverse effect** at Year 10 of operation.

Effects on views from PRoW south-east of the A64

Users of these routes would not have a view of the proposed development.

Effects on views from Kimberlow Hill

Visitors to Kimberlow Hill would have distant views of the new campus buildings which would form only a small element in the distant view and would be seen alongside the existing campus buildings.

The magnitude of predicted effect is considered **low**, which when combined with the medium sensitivity gives a **minor adverse effect** at Year 10 of operation.

Effects on views from Fulford Golf Course

Users of the Fulford Golf Course would not have a view of the proposed development.

Effects on views from the A64

Users of the A64 would have transient and oblique views of the proposed development. Views would be glimpsed between the roadside vegetation. At its closest the proposed development would be some 120m distant, which is considered to be a sufficient degree of separation to substantially limit the visual effects. Enhancement of the intervening farmland with new hedgerows and tree planting (see **Figure 10: Landscape Buffer** in Appendix 1) would provide additional screening and filtering of views.

The magnitude of predicted effect is considered **low**, which when combined with the medium sensitivity gives a **minor adverse effect** at Year 10 of operation.

Effects on views from Common Lane

Views from Common Lane are generally restricted to glimpses through gaps in the hedgerow and field gates. At its closest the proposed development would be some 400m distant, which is considered to be a sufficient degree of separation to limit the visual effects.

The magnitude of predicted effect is considered **low**, which when combined with the low sensitivity gives a **minor adverse effect** at Year 10 of operation.

Effects on views from Low Lane

Users of Low Lane would have close range but transient and oblique views of the proposed development. Views would be glimpsed above and between the roadside vegetation. There would be a change in the outlook from an open rural fringe agricultural landscape to a campus development set within a high quality designed parkland landscape. The maturing linear woodland planting around the periphery of the site would provide a significant degree of screening by year 10 and the outlook from the lane, although one of developing woodland rather than open fields would remain rural in character.

The magnitude of predicted effect is considered **medium**, which when combined with the low sensitivity gives a **minor adverse effect** at Year 10 of operation.

Effects on views from Field Lane

Users of Field Lane would experience glimpsed, transient and generally oblique views of the new campus buildings set within a high quality landscape setting. At its closest the proposed development would be some over 500m distant, which is considered to be a sufficient degree of separation to limit the visual effects. The proposed development would not be an incongruous new feature as the existing campus buildings are already present within the view. It would also be in scale with the remaining landscape elements (existing field trees and overhead power lines).

The magnitude of predicted effect is considered **low**, which when combined with the medium sensitivity gives a **minor adverse effect** at Year 10 of operation.

6.3 Likely effects of development on the City of York Draft Allocation site

Effect on the landscape of the allocation site

The landscape of the City of York Draft Allocation site would change from arable farmland with few trees to a low-density, low-rise university campus set within a high quality designed parkland landscape (similar to the current Campus East site). The current pattern of open fields with low hedgerow boundaries would be replaced by a new landscape comprising low rise, low density buildings set within a high quality parkland landscape with new ecologically designed water features and areas of recreational green space. Much of the perimeter of the site would be enclosed by linear woodland belts, which would reduce the scale of the landscape and current sense of openness.

The magnitude of effect is considered to be **low adverse** which when combined with a low-medium sensitivity gives a **minor adverse** effect at Year 10 of operation.

Effect on the local landscape

Within the local landscape, the new university campus would appear as an extension to the existing university buildings and would provide a high quality setting to the southern side of the lake. The linear woodland belts and replanted hedgerows and hedgerow trees to the south of the campus would help to integrate the development into the wider landscape. Whilst an area of farmland would be lost, this is considered to be of low/ medium sensitivity as it is influenced by proximity to settlement and contains urban elements such as pylons and communications masts as well as the A64.

The size of the University of York Proposed allocation is also small in proportion to the size of local landscape – the area defined as the Local Landscape covers 550.15ha, with the University of York Proposed Allocation covering 20.96 ha or 3.8% of the area.

At Year 10 magnitude of predicted effect is considered **negligible**, which when combined with a low-medium sensitivity gives a **negligible** effect at Year 10 of operation.

Effect on the landscape setting of Heslington Conservation Area

The distance between the eastern edge of the Conservation Area is 925m to the red line boundary and 1km to the closest proposed buildings. This is considered a sufficient degree of separation to ensure that the open and rural quality of the eastern edge of the Conservation Areas would be retained. The relatively low building heights proposed (three storeys) would prevent the proposed development from intruding on the landscape setting of the Conservation Area.

There would be limited effects on views towards the Conservation Area. The Conservation Area appraisal states that views of the Conservation Area are particularly prominent from the A64 – the viewpoints taken as part of this assessment do not support this position as it is difficult to distinguish the Conservation Area buildings from the general skyline elements.

The magnitude of predicted effect is considered **negligible**, which when combined with the medium sensitivity gives a **minor adverse** effect at Year 10 of operation.

Effect on views from the eastern edge of Heslington and on the Heslington East Campus

Residents on the eastern edge of Heslington and on the Heslington East Campus would have glimpsed and generally oblique views of the new campus development set within a high quality designed parkland landscape. The distance between the eastern edge of the Conservation Area is 925m to the red line boundary and 1km to the closest buildings within the proposed development. This distance, combined with the relatively low building heights proposed (three storeys) would reduce the visibility of the proposed development. Even where visible, the new campus development would not be an incongruous new feature within the view and would be in scale with the remaining landscape elements (existing field trees and overhead power lines).

The magnitude of predicted effect is considered **low**, which when combined with the medium sensitivity gives a **minor adverse effect** at Year 10 of operation.

Effect on views from scattered properties to the south and east

Residents living in scattered properties to the south and east would have some glimpsed views of the new campus development, but the majority of the views would be screened and filtered by the intervening vegetation and farm buildings. Where views are available, the new campus buildings would be seen within a maturing landscape setting and in the context of the existing campus buildings, albeit that they would be slightly closer in the view. The development would not appear an incongruous feature.

The magnitude of predicted effect is considered **negligible**, which when combined with the medium sensitivity gives a **negligible effect** at Year 10 of operation.

Effect on views from Wilberforce Way

Most views of the proposed development from Wilberforce Way would be screened by intervening vegetation. Where views are available, the new campus buildings would be seen within a maturing landscape setting and in the context of the existing campus buildings. They would also only be experienced transiently. The development would not appear an incongruous feature.

The magnitude of predicted effect is considered **negligible**, which when combined with the medium sensitivity gives a **negligible effect** at Year 10 of operation.

Effect on views from the Heslington Conservation Area.

Whilst the proposed development would be distantly visible from the eastern edge of the Conservation Area, the maturing linear woodland belt on the western edge of the development, would help to screen the lower parts of the built development. The relatively low building heights proposed (three storeys) would not result in the development appearing visually intrusive and would be proportional to the height of existing vegetation and vertical infrastructure in the view.

Due to the distance and the screening effects of maturing landscape the magnitude of predicted effect is considered **low**, which when combined with the medium sensitivity gives a **minor adverse effect** at Year 10 of operation.

Effect on views from Public Right of Way (PRoW) 7/6/10 Green Lane and PRoW 7/6/20

New campus development would border the eastern side of this PRoW and users of the footpaths would experience a change in the outlook from an open rural fringe agricultural landscape to a

campus development set within a high quality parkland landscape. The maturing landscape around the periphery of the site would provide a substantial degree of screening by year 10 and the outlook from the PRoW, although one of developing woodland rather than open fields would remain rural in character. Views to the west would be unaffected.

The magnitude of predicted effect is considered **medium**, which when combined with the medium sensitivity gives a **moderate adverse effect** at Year 10 of operation.

Effect on views from PRoW 14/16/30 and PRoW 14/16/40 Users of PRoW 7/8/10

Users of these routes would experience glimpsed and generally oblique views of the new campus buildings set within a high quality landscape setting. The new development would not be an incongruous new feature as the existing campus buildings are already present within the view. It would be in scale with the remaining landscape elements (existing field trees and overhead power lines).

The magnitude of predicted effect is considered **low**, which when combined with the medium sensitivity gives a **minor adverse effect** at Year 10 of operation.

Effect on views from PRoW south-east of the A64

Users of these routes would not have a view of the proposed development.

Effect on views from Kimberlow Hill

Visitors to Kimberlow Hill would have distant views of the new campus buildings which would form only a small element in the distant view and would be seen in conjunction with the existing campus buildings.

The magnitude of predicted effect is considered **low**, which when combined with the medium sensitivity gives a **minor adverse effect** at Year 10 of operation.

Effect on views from Fulford Golf Course

Users of the Fulford Golf Course would not have a view of the proposed development.

Effect on views from the A64

Users of the A64 would have transient and oblique views of the proposed development. Views would be glimpsed between the roadside vegetation. While the allocation abuts the A64, proposed built form would be some 120m distant, which is considered to be a sufficient degree of separation to limit the visual effects. Enhancement of the intervening farmland with new hedgerows and tree planting (see **Figure 10: Landscape Buffer** in Appendix 1) would provide additional screening and filtering of views.

The magnitude of predicted effect is considered **low**, which when combined with the medium sensitivity gives a **minor adverse effect** at Year 10 of operation.

Effect on views from Common Lane

Views from Common Lane are generally restricted to glimpses through gaps in the hedgerow and field gates. At its closest the proposed development would be some 700m distant, which is considered to be a sufficient degree of separation to limit the visual effects.

The magnitude of predicted effect is considered **low**, which when combined with the low sensitivity gives a **minor adverse effect** at Year 10 of operation.

Effect on views from Low Lane

Users of Low Lane would have close range but transient and oblique views of the proposed development. Views would be glimpsed between and above the roadside vegetation. There would be a change in the outlook from an open rural fringe agricultural landscape to a campus development set within a high quality designed parkland landscape. The maturing landscape around the periphery of the site would provide a significant degree of screening by year 10 and the outlook from the lane, although one of developing woodland rather than open fields would remain rural in character.

The magnitude of predicted effect is considered **medium**, which when combined with the low sensitivity gives a **minor adverse effect** at Year 10 of operation.

Effect on views from Field Lane

Users of Field Lane would experience glimpsed, transient and generally oblique views across the roadside hedgerows of the new campus buildings set within a high quality landscape setting. At its closest the proposed development would be some 800m distant, which means that the proposed development buildings would form a very small part of the overall view and would be seen in the context of the existing campus buildings.

The magnitude of predicted effect is considered **negligible**, which when combined with the low sensitivity gives a **negligible adverse effect** at Year 10 of operation.

7.0 ASSESSMENT SUMMARY AND COMPARATIVE APPRAISAL OF THE TWO ALLOCATION SITES

7.1 Summary of landscape and visual effects

A summary of the landscape and visual assessment is provided in **Table 1**. This is followed by a comparison of the two allocation sites in terms of likely effects on landscape and visual receptors.

Table 1: Summary of Landscape & Visual Effects of both allocations

Receptor	City of York Draft Allocation	University of York Proposed Allocation
Allocation sites	Relatively small area of low-medium sensitivity arable fields affected through campus extension development.	Slightly larger area of low-medium sensitivity arable fields affected. Effects of loss of additional field not considered to be significant
The Local Landscape	Size of the allocation is considered to be small with limited influence on the Local Landscape. Effects not considered to be significant.	Size of the allocation is slightly larger but still considered to be small with limited influence on the Local Landscape. Effects not considered to be significant.
Heslington Conservation Area	Development would be brought closer to the edge of the Conservation Area but a sufficient degree of separation remains to ensure that the open and rural quality of the eastern edge of the Conservation Areas would be retained. Effects not considered to be significant.	Development would be brought closer to the edge of the Conservation Area but a sufficient degree of separation remains to ensure that the open and rural quality of the eastern edge of the Conservation Areas would be retained. Effects not considered to be significant.
The establishment of Green Belt boundaries	A strong green belt boundary can be established on the southern and eastern boundaries.	A strong green belt boundary can be established on the southern, western and eastern boundaries.
Relationship between the historic City of York and its surrounding villages	No effect	No effect
Visual Receptors	ZTV similar for both allocations. Visual effects not considered to be significant.	ZTV similar for both allocations. Visual effects not considered to be significant.

The proposed development has been assessed at 10 years of operation. At this point the maturing landscape structure would help integrate the proposed development into the landscape and screen and filter views of the new buildings from the surrounding area. This applies to both of the allocation sites being considered.

7.2 Allocation sites

In both development scenarios, an area of arable farmland would be lost but in neither case is this considered significant as the landscape is of low/ medium sensitivity. Both sites are influenced by

proximity to settlement and contains urban elements such as pylons and communications masts and are also affected by proximity to the A64.

The City of York Allocation site is smaller (20.96 ha) than the University of York Proposed Allocation site (26.43ha). However, the additional 5.47ha comprises one additional arable field set within a rural fringe landscape which is considered to be of low landscape value. The loss of this additional field would not give rise to a significant effect on the local landscape compared to the City of York Draft Allocation site.

The University of York Proposed Allocation is also set back from the A64 so a buffer is retained between it and the road.

7.3 Local landscape

None of the local landscape effects identified is considered significant (i.e. moderate or above) for either allocation site. This is partly a reflection of the design of the proposed development and partly of the character of the local landscape. The new campus is designed to be low density and low rise and would be set within a designed parkland setting with linear belts of woodland along the much of the perimeter to help screen views particularly from Heslington and the Heslington Conservation Area. The local landscape is one of relatively level arable farmland with medium sized fields bounded by hedgerows with occasional hedgerow tree and some linear tree belts. The presence of urbanising influences such as nearby settlement, the existing campus buildings, and infrastructure including the A64, pylons and a telecommunications reduce scenic quality and perceptions of tranquillity. Overall the farmland is reasonably attractive but unremarkable.

The size of the allocated sites is small compared to the geographic area of the defined local landscape the University of York Proposed Allocation covers 26.43 ha or 4.8% of the area and the City of York Allocation site covers 20.96ha or 3.8% of the area.

7.4 Heslington Conservation Area

Development on the University of York Proposed Allocation site would bring new campus development some 350m closer to the Conservation Area than development on the City of York Draft Allocation site but the distance of 650m to the nearest new buildings is considered a sufficient degree of separation to ensure that the open and rural quality of the eastern edge of the Conservation Areas would be retained. The relatively low building heights proposed (three storeys) would not intrude on the landscape setting of the Conservation Area and would be proportional to the height of existing vegetation and vertical infrastructure in the area. Furthermore the substantial linear woodland belt proposed for the western boundary of the University of York Proposed Allocation site would be maturing and would ensure the maintenance of the existing rural setting to the Conservation Area.

In terms of views towards the Conservation Area – the Conservation Area appraisal states that views of the Conservation Area are particularly prominent from the A64, however the viewpoints taken as part of this assessment do not support this position as it is difficult to distinguish the buildings within the Conservation Area from the general skyline elements.

7.5 Green Belt boundaries

The University of York Proposed Allocation site allows for the development of strong new landscape structure along its western boundary. Land ownership issues precludes the development of this belt of linear woodland along the western edge of the City of York Draft Allocation site.

7.6 Relationship between the historic City of York and its surrounding villages

Development on either allocation is not considered to have any influence on the separation with and identity of the unnamed surrounding villages. The A64 forms a significant and prominent separating feature in the landscape. This is consistent with the findings of the Expert Statement of Heritage Matters.

7.7 Visual receptors

There is no substantial difference between the areas of theoretical visibility defined in the ZTVs for the two allocation sites.

In terms of residents, including those living on the eastern edge of Heslington and within the Heslington Conservation Area, none of the visual effects identified for either of the allocation sites is considered significant (i.e. moderate or above). Development on the University of York Proposed Allocation site would bring new campus development some 350m closer to residential properties on the edge of Heslington than development on the City of York Draft Allocation site but it would still be sufficiently distant to avoid any significant effects on residents. Furthermore the new linear woodland belt would be maturing and would help screen and filter views of the buildings and integrate the development into the wider landscape.

Many views towards the allocation sites are screened or filtered by intervening vegetation but where views are available between existing buildings and vegetation, the new campus buildings would be seen within a maturing landscape parkland setting. The new campus development would not be an incongruous new feature within the view and would be in scale with the remaining landscape elements (existing field trees and overhead power lines). At 10 years of operation the linear woodland planting belt along the western side of the proposed development would provide a substantial degree of additional screening.

For a number of receptors, particularly PRoW or road users with close or foreground views of either allocations site the effects of the proposed development would be significant and adverse in the short term. At 10 years of operation however the maturing landscape would help to screen views of buildings and integrate the proposed development into its wider visual context. The overall view would change but would be attractive and appear as an extension of the existing university campus.

7.8 Summary

The effects of the proposed development on either allocation site would result in broadly similar landscape effects, none of which is considered to be significant.

Proposed development on the University of York Proposed Allocation site would slightly increase some of the visual effects compared to development on the City of York Draft Allocation site but not to such a degree that they would fall into a different category of significance at year 10 of operation.

DRAFT ALLOCATION ST27

EXPERT STATEMENT: HERITAGE MATTERS

**DR CHRIS MIELE IHBC
MRPTI FRHS FSA
SENIOR PARTNER
MONTAGU EVANS LLP**

MARCH 2018

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1.0 INTRODUCTION AND SCOPE OF STATEMENT

- 1.1 My name is Chris Miele and I am a senior partner at Montagu Evans LLP. I am a chartered town planner and historian by profession and I have specialised in advising on the interaction of the planning system with the historic environment for some 27 years.
- 1.2 Section 2.0 and Appendix 1.0 gives particular of my background and the basis of my expertise.
- 1.3 I have prepared this statement on behalf of the University of York.
- 1.4 In it I address the objection which Historic England has raised to the proposed allocation ST27, promoted by the local planning authority for the expansion of the University of York's campus.
- 1.5 Historic England have also objected to the University's alternative allocation, which overlaps to an extent with the Council's preference but is larger and extends further west.
- 1.6 For my purposes, there is in fact little difference between the two options because the HE objection to each is effectively the same: that all open land outside the present settlement edge (Green Belt land) is vital to the historic identity of the City of York.
- 1.7 I do not dispute that some open land outside the settlement edge of the city does contribute to an appreciation of what is special historically about York. I consider those elements later in this statement.
- 1.8 The land in question, however, is in no way comparable to that land. This part of the Green Belt does not offer any views of the Minster. Neither is the land necessary to maintain the distinct identity of one of the ancient city's historic 'satellite' settlements from which it is well separated (not least by the Ring Road, the A64).
- 1.9 The land itself has no intrinsic value and contributes nothing either to the historic landscape structure, which is well documented. Neither does the land contribute in any meaningful way to the setting of the historic settlement of Heslington to the west, which is now partly co-terminus with the University.
- 1.10 Insofar as I have been able to ascertain, from the Heritage Topic Paper and other sources, the land under consideration has no direct historic associations. I am not aware it is, for example, near to the site of any famous battle.¹
- 1.11 There are understood to have been as many as 11 Roman roads converging at York. The Hull Road, north of the site (and forming one of the arms of the nearest roundabout

¹ The nearest I have been able to identify is at the crossing point of the Germany Beck in Fulford, south of Fulford (see battle here in 1066). This land was subject to a Scheduling request which was dismissed, and subsequently judicially reviewed (unsuccessfully). The land is now, I understand, subject to development by Persimmon Homes.

junction with the A64), is understood to have been on the alignment roughly of one of these. And certainly this route is of some antiquity anyway, but the ST27 land does not abut it, and so I can see no setting or similar associative relationship.²

- 1.12 In any event, Historic England assert no such association.
- 1.13 In short the land in question does not contribute any demonstrable or real value to our ability to appreciate what is special about the historic city. The objection is, I am forced to conclude, based on an abstraction, on an asserted setting relationship which is not present.

² There is a good article on this network at British History Online, drawn from the Royal Commission volume on York, originally published in 1962. See <http://www.british-history.ac.uk/rchme/york/vol1/pp1-4>.

2.0 BACKGROUND AND EXPERTISE

- 2.1 Appendix 1.0 comprises my CV and list of professional and academic publications.
- 2.2 I am a chartered town planner and qualified conservation expert (IHBC), and have advanced qualifications in historical studies (a PhD in the history of architecture and urban planning). Alongside my professional work I continue to work as a professional historian, writing, lecturing and reviewing specialist publications. I am chair of the Board of the Centre for Urban History, Leicester University, and am being considered for the role of honorary professor at Glasgow University in the department of real estate and development.
- 2.3 In recognition of my contribution to academic matters, in particular my publications, I have been elected a Fellow of the Royal Historical Society and of the Society of Antiquaries, London.
- 2.4 I have held various appointments over the years and which arise from my expertise. These include serving on the national design review panel of CABE and advising a House of Commons Select Committee. I have been a guest curator of a major national exhibition (at the V&A).
- 2.5 I am a senior and owning partner at Montagu Evans LLP, based on our central London headquarters, where I lead a team of 12 experts working in the development planning team. I provide planning advice on many sites where heritage is a leading issue.

Employment

- 2.6 My previous employment comprises: English Heritage (1991-98); Alan Baxter and Associates (Senior Director, 1998-2005); RPS Planning (2005-2007) and since then ME.

Public and Charitable Sector Clients

- 2.7 I have many clients in the arts and higher education sector. My university clients include: Sheffield University, Leicester University (unrelated to my role at the CUH), Durham University, Oxford University plus several colleges, Sussex University, and Kings College London. This is my first instruction for the University of York. I advise the Royal College of Surgeons on their redevelopment in Lincolns Inn Fields, and the Inn itself on a major new education centre at the heart of the historic complex. My arts clients include: the British Museum, the National Gallery of Art, and the South Bank Centre.
- 2.8 I have worked on many very sensitive sites, involving highly graded listed buildings including Salisbury Cathedral, Westminster Abbey, the British Museum, major country houses and registered parks and gardens, and World Heritage Sites. I am used to

working in densely layered historic environments, both in London but also in historic town centres.

Private Clients

- 2.9 My private clients include the leading commercial and residential developers, from Berkeley Homes to Barretts and CEG to Land Securities, Hammerson and Westfield (I work on the major shopping centre in West London). I also act for local planning authorities: current and recent instructions include the London Borough of Hillingdon, the Royal Borough of Greenwich (I am leading the team providing all planning advice on a new creative quarter in Woolwich Arsenal), Sheffield City Council and Ashford Borough Council.
- 2.10 In the last 7 or so years, I have become involved increasingly in urban extensions to existing settlements, most involving housing, with sites ranging from as few as 80 dwellings to 10,000 (the latter is an instruction for Places for People, proposing a new settlement in East Herts). This work is a combination of local plan representation and application support, and alongside this I act regularly as an expert witness at section 78 Appeals. I also am involved in other jurisdictions, in both houses of the tribunal, in civil court matters, consistory and criminal courts, and on occasion prepare witness statements in connection with JRs and statutory challenges.

Expert Affirmation

- 2.11 As noted above, I act regularly as an expert witness and so set out below the statement of truth that applies to the evidence I have provided to the Inspector.
- 2.12 I confirm, first, that, insofar as the facts stated in my Proof of Evidence are within my own knowledge, I have made clear which they are and that I believe them to be true, and that the opinions I have expressed represent my true and complete professional opinion. I confirm also that my Proof of Evidence includes all facts which I regard as being relevant to the opinions that I have expressed and that attention has been drawn to any matter which would affect the validity of those opinions.
- 2.13 I confirm that my duty to the Inspector and the Secretary of State as an expert witness overrides any duty to those instructing or paying me, that I have understood this duty and complied with it in giving my Evidence impartially and objectively, and that I will continue to comply with that duty as required.
- 2.14 I confirm that I am neither instructed, nor paid, under any conditional fee arrangement by the appellant.
- 2.15 I confirm that I have no conflicts of interest of any kind other than any already disclosed in my Proof of Evidence.

- 2.16 Finally, I confirm that my Proof of Evidence complies with the requirements of the Royal Town Planning Institute, as set down in the revised Royal Town Planning Institute “Chartered Town Planners at Inquiries – Practice Advice Note 4”.

3.0 THE HISTORIC ENGLAND OBJECTION

3.1 The Historic England objection is set out in its letter of 30 October 2017 (Appendix 2.0), a formal response to the City of York Local Plan: Pre-Publication Draft (see Appendix 3.0 for extracts).

3.2 Page 3 of this letter deals with the draft allocation for the University, where HE state that

‘... further consideration needs to be had to how the growth of this important institution might be delivered in a manner which best safeguards the elements which contribute to the setting of this important historic City.’

3.3 The detailed comments on the allocation are set out on pages 29 and 30, where the ‘elements that contribute to the setting of this important historic City’ are listed.

3.4 The first is visual impact: ‘this area is prominent in views from the A64’. The proposal would bring development close to the Ring Road, fundamentally changing ‘the relationship which the southern edge of York has with its countryside to the south. It will also alter perceptions when travelling along this route about the setting of the City within an area of open countryside’.

3.5 The proposed landscape buffer would, it is contended, in itself cause harm because it will comprise an alien feature.

3.6 On this point, I refer the Inspector to the landscape submission for the University which explains how landscape screening can be designed in a way which does not present a solid and visually impermeable block of woodland.

3.7 There is, however, no view of the Minster or any other element of the historic city from this part of the Ring Road or indeed from any part of the University campus or the allocation land. The land at its nearest point is about 3 km to the nearest part of the walled city and nearly 4 km to the Minster.

3.8 As noted earlier, in my introductory section (and in footnote 2), the Hull Road is a route of some antiquity and one route to the University from the City centre would follow that route. Equally, a vehicle accessing the University from the east would travel along Hull Road, before accessing the site off Field Lane (and so encountering the Heslington East Campus). The site is, though, still further beyond the existing campus sites as accessed off the Hull Road, so one’s experience of it is divorced from the Hull Road, whose character in parts anyway is that of dual carriageway, then a busy route (the A1079) with suburban development lining it nearest the University.

3.9 From Field Lane, near the junction providing access to the eastern part of the campus, the journey by bike is about a quarter of an hour, on foot nearly three quarters of an hour, and by motorised transport anywhere from 15 to 20 or so minutes.

- 3.10 The proposed land does not feature in any experience of the assets which define York and make it special, and the land itself is not part of the historic landscape structure which does contribute to the historic city's special interest. I discuss this matter further in the next section where I treat the 2014 Heritage Topic Paper (Appendix 4.0).
- 3.11 Secondly, HE contend that the expansion towards the Ring Road would 'also harm the relationship which the historic city of York has to the surrounding villages – another element identified in the Heritage Topic Paper [produced by the City Council and discussed in the following section]. This relationship relates to not simply [sic] the distance between the settlements but also the size of the villages themselves, and the fact that they are freestanding, clearly definable settlements'.
- 3.12 This objection does not identify which villages are of concern. The assertion is a generalised one which is not helpful in the circumstances.
- 3.13 The nearest sizeable ancient settlement to the allocation land is Dunnington, which is Anglo-Saxon in origin. From the roundabout junction of the A64 with the A166/A11079 (the junction nearest the allocation), the journey by motorised transport takes about 6 minutes over a distance of some 3.4 km; google gives me a journey time of 8 minutes by bike. The Ring Road itself is a significant threshold and boundary too. The linear distance from the roundabout to the centre, roughly, of the village is some 2 km.
- 3.14 There is a smaller historic settlement at Murton, which is much nearer, which is home to the Yorkshire Museum of Farming. Its setting comprises the busy dual carriageway which is the Ring Road, a significant separating feature, and I can see no erosion of its identity on that basis.
- 3.15 The only other significant historic settlement on this side is Stockton-on-the-Forest, a linear settlement of medieval origins at least. This is even more distant by any form of transport and further as the crow flies, some 4.4 km.
- 3.16 I cannot understand that one's awareness of or appreciation for the separate identity and history of these settlements would be undermined in any way by the development of the proposed allocation.
- 3.17 Historic England make a specific allegation of a similar nature in relation to one location: 'The expansion of the University would effectively reduce the gap between the edge of the built up area of the City and this proposed new settlement at Elvington Lane (Site ST15) to 1.6 km'. This is, I believe, formally identified in the plan as the Whinthorpe New Settlement.
- 3.18 HE's concern about separation from outlying settlements may have some force in respect of this site, but even if it that is right it has no relevance to the consideration of ST27 which is set well within the Ring Road and closely associated with the existing University campus.

- 3.19 This component of the objection relates to HE's preferred option for growth to be accommodated in new, freestanding settlements. Thus, the objection is not to eroding the distance between any particular ancient settlement and the City edge (which is not in most places historic anyway) but between the City edge and a new settlement as perceived across the Ring Road. The objection is also based on the premise that 1.6 km is insufficient a gap to ensure the identity of the desired new settlement as distinct from York. This objection relies, again, on the conflation of the historic city of York with the wider City of York, and the nearest heritage asset within the Ring Road is Heslington Village which is a conservation area containing many listed buildings of quality including C18 properties laid out by the Halifax estate and lining Main Street.
- 3.20 That asset is about 1 km distant from the boundary of the new settlement proposed, again across a modern ring road, and that does not take into account some landscape buffer as well.
- 3.21 HE's reasons for preferring new settlements to urban extensions is set out earlier in their letter, on page 1. That support is based on the desire to prevent the existing city from extending any further.
- 3.22 This appears to me to be a spatial planning objection not a heritage one.
- 3.23 HE's objection in principle, then, does not appear based on concern over any particular impact on a specific asset, but on the perception that an underlying character of the historic city (which they conflate with the City as a whole) would be undermined by any loss of Green Belt within the Ring Road, and has no application to this part of the City in particular.
- 3.24 The letter cites the Heritage Topic Paper as support for this position, founded on an abstraction, and so I want to consider that material now briefly.

4.0 THE HERITAGE TOPIC PAPER (OR ‘HTP’, APPENDIX 4.0) AND CONSIDERATIONS OF SETTING

- 4.1 The Heritage Topic Paper supporting the local plan was published in September 2014 as part of the local plan evidence base.
- 4.2 In this section I consider the way the paper, as a whole, characterises the setting of the historic city, and the City. I attach the HTP at my Appendix 4.0.
- 4.3 The part of the HTP that concerns me, since it appears to provide some basis for the HE objection, is section 6.0.
- 4.4 I say ‘appears’ because read as a whole the document provides only a very slender basis for the objection.

The Treatment of the City’s Setting in the HTP Generally

- 4.5 Section 2 identifies a range of potential setting considerations defined in relation to views, notably those of the Minster over distance. This is an important part of the wider historic setting of the City. There is no such view of the Minster affected by ST27 or even in the approaches to it.
- 4.6 The document discusses a broad set of setting considerations at 2.4, for example, where it identifies the historic core and further character defining features outside. These latter comprise ‘ancient arterial roads and commons (the green wedges formed by the Strays), the river valleys and patterns of villages set within a predominantly flat landscape of pasture, arable, woodland and wetland’. ST27 does not affect the setting or character of any such features.
- 4.7 Paragraph 2.8 notes that the ‘chronological and spatial expansion of the historic city terminates in a **clear frontier** [my emphasis] where the rural characteristics of farmland and woodland take over [to] provide a buffer zone between villages and the core’. ST27 does not lie on any route to this network of villages, on any arterial route or any historic open space. The later expansion of the City on this side separates the historic core from the edge here. The open spaces that lead into the centre in some areas do not cross the site or come near to it.
- 4.8 I highlight the phrase ‘clear frontier’ above because it goes to reinforcing a repeating idea, that of York as a compact city. York the historic city is most certainly compact, and well defined by historic features including the walls. The whole of the City, however, does not have a compact form at all. Green wedges run into the centre, and some of them have historic landscape interest (strays, ings and commons). I do not see a clear frontier at all when I look at the Land Ranger, excepting, that is, the Ring Road which provides a clear boundary, of things within it, and associated with the City (modern conurbation) and things without it.

- 4.9 And if the point being made here relates to the landscape setting of the A64, then this would be protected in any event by a buffer or landscape margin, which could be achieved with the draft allocation or the University's preferred area.
- 4.10 I commend this point to the Inspector – on urban 'definition' – because it goes to the heart of what I believe is a flaw in the reasoning that underlies the Historic England objection (misinterpreting, I believe erroneously, the HTP). The flaw can be expressed simply thus: York has a compact and well defined historic core; the historic central conservation area is more or less co-terminus with the City centre as defined in the plan. The City being compact as a whole – the reasoning goes – so its edge is no more than the core's outer expression. Therefore any change on the edge, it follows following this rationale, perforce affects the historic integrity of the town.
- 4.11 The outward expression of the town edge, outside historic and other natural features, appears to me to be no more than the consequence of the flatness of the terrain which makes expansion in different directions relatively straightforward and logical. This outwards expansion is itself not 'historic' in the sense that term is normally used, that is, to define land as sensitive for planning purposes. The suburban expansion of York in the C20 is naturally part of its history, and some of those suburbs are in fact historic (notably New Earswick). But the majority of course are no more than ordinary suburban areas.
- 4.12 This process of outward expansion is no different to what one finds in most historic cities in the UK and in Europe besides. The suburbs around Chester or Warwick do not make their ancient centres any less historic. Anyone visiting or living in these places understands perfectly well the difference between the historic centre and the outlying districts, whose character will inevitably be varied and probably pretty ordinary. The Hull Road as it leaves the A64 is unprepossessing, and offers no enticing introduction to the beauties of the historic core. The site does not figure in the rail approach or in the main road approach, which is along the A64 as it approaches from the SW (leaving the A1(M)).
- 4.13 I leave it to the Inspector to judge the merits of this line of reasoning and, critically, whether there is any support for it in any planning policy document or statutory provision or interpretation. It seems to me, it must be said, to be a novel interpretation that stretches the point.
- 4.14 The HTP here, and in other places, has a somewhat academic quality to its drafting, talking about the past being 'contested' (a term taken from literary criticism). Somewhat surprisingly, the HTP presents its findings as somehow contingent and unfinished. At paragraph 3.3 it states, for example, that the evidence base is 'subjective and that at any one moment the constituent parts of the categories can change and be redefined.' This is an academic approach and not helpful to the planning process. And that approach – of treating the historic environment as something which is ineffable – explains the opaque reasoning that makes the edge of modern York as a metaphor for the edge of historic York.

- 4.15 I am, as a planner, aware that one of the purposes of Green Belt is to protect the integrity of historic settlements; but the edge we are concerned with here is some distance from the walls and, indeed, even beyond Heslington, itself an outlying settlement of historic York.
- 4.16 Section 4.0 of the document is more empirical, identifying five factors as contributing to the ‘special character and significances of the City of York’. ‘Landscape’ is one of those factors – see paragraphs 4.8 and 4.9. The following specific features are identified as:
- Flat and low lying agricultural land dominated by the wide flood plain of the River Ouse, rising slightly to the east
 - The green river corridors comprising the Ouse, the Foss and the Derwent
 - The ancient strays and ings [sic] that extend open countryside into ‘the heart of the main urban area and will continue to provide spatial constraints for development’.
- 4.17 Also identified are sites of nature and scientific interest, comprising commons and ings in some cases and which would include Heslington Mire, stretching south of Heslington and away from ST27.
- 4.18 The factor ‘Landscape and Setting’ are expanded at paragraphs 5.78 and ff.
- 4.19 That part of the HTP begins by recognising views of the Minster and these must be critical in establishing the historic identity of the City. Hence where there are no views of the Minster, then the understanding of the historic identity of the City will be less. There are, as noted, no views of the Minster or any other part of the historic core from or near ST27.
- 4.20 The text under ‘Landscape and Setting’ elaborates on the river valleys and ings (a form of common land management, and which include some wetlands), SSSIs, and ‘open countryside’. This is described as ‘lowland heath’ (paragraph 5.81), and identified as the most significant habitat in the York area. A number of particular sites are identified: Strensall Common, Wheldrake Wood, Hagg Wood, Walmgate Stray, Heslington Tilmire, Askham Bog. None are near to ST27.
- 4.21 The setting of the settlement and its landscape character is a matter of fact, and there is no suggestion that arable farmland per se, of the kind on and near to ST27, forms part of a structure reflecting historic significance of the settlement in its various aspects. The University campus is not identified as historically significant in townscape terms, though in fact it has some interest as I will explain in the next section.
- 4.22 Section 6 deals with policy and so considers the purpose of Green Belts, and as already noted one of those is ‘to preserve the setting and special character of historic towns’.
- 4.23 If there is no tangible expression of the historic character of the City from ST27 or near it, including from the Ring Road, and the nearest formally designated area is some

distance away, I do not see the land can have any particular planning function on that count. And anyway that Green Belt purpose will not always be relevant uniformly. And finally the purpose includes ‘setting’ which must have its normal planning meaning, and that has been carefully defined in guidance I discuss later. .

- 4.24 This section of the HTP concludes with an identification of all potential assets contributing to York’s special interest as an historic city. Ordinary arable farmland of the kind we find on and around ST27 is not identified as having any particular interest, and indeed it does not from a heritage perspective.
- 4.25 Within this section there is a discussion of ‘compactness’. This identifies the city as a series of self-contained settlements each with its own agricultural hinterland. ST27 comprises the historic agricultural hinterland of Heslington which is an outlying settlement now adjoining the University. Heslington’s farmland cannot also be York’s farmland, at least not without again stretching a point until it breaks.
- 4.26 Rather the concept of ‘compactness’ relates to views out to countryside, and there are no views out from the developed area across ST17 of any historic importance, contributing to the historic identity of the area, and no concern about loss of identity of Heslington either.
- 4.27 Page 39 has a table summarising ‘compactness’ that relates to the flat terrain and views, but again this pertains to views ‘out of and in to the historic core’, and there are no such views engaged in relation to ST27.
- 4.28 The topic ‘Landscape and Setting’ is elaborated on pages 56 and following, paragraphs 6.29 and 6.30 with an accompanying table.
- 4.29 Paragraph 6.29 states ‘The landscape provides the city and its outlying villages with a rural setting and a direct access to the countryside, and thus has a value/status that reaches beyond the relative quality of the aesthetic landscape’.
- 4.30 It continues, at 6.30: ‘Its [assume ‘the landscape’] lies in the conglomeration of layers and relics of old landscapes, in part conserved through time by continuous administration, absence of development, and centuries of traditional management.’ Critically, this text continues: ‘It is the combination of the various elements such as the ings and strays that provides York’s unique makeup. The natural environment is significant in its concentrated collection of a variety of examples of historically managed landscapes, represented for example by wild flower meadows, lowland heath, valley fen, strip fields, veteran orchard trees and species-rich hedgerows. Many of these otherwise isolated remnant landscapes link up with other open spaces resulting for example from our industrial or war time past to form often accessible tracts of subtly diverse landscapes; thus the landscape/natural heritage is much greater than the sum of its parts’.

- 4.31 ST27 does not form part of any such network. It is in effect isolated by the University and the Ring Road on two sides, and comprises fairly typical rectangular fields of a kind associated with ordinary enclosure cultivation. It is not special landscape in terms of its aesthetic quality.
- 4.32 Apparent support for the HE position is embedded in the long table that falls within this section of the HTP, and I direct the Inspector to page 57.
- 4.33 This deals with ‘Landscape and Setting’, identifying in the left-hand column ‘Character elements’, in the next column ‘Key Features’ and then examples.
- 4.34 ‘Rural edge setting viewed from the majority of the ring road by of field margin (northern ring road business parks exception to the rule)’.
- 4.35 The ‘Examples’ given in column three are relevant to this matter. This is not an exhaustive list, clearly, but each example appears to be views of a defined, characteristic feature: the Minster notably but also the Ouse. The ‘Significance’ column, the fourth, explains, that ‘This is an important English cathedral landscape that goes to the heart of York’s identity and attractiveness... [featuring] a unique combination of elements of historic/cultural significanceThe proximity of hills/countryside gives a strong sense of place and location’. Rare long distance views are rare – element of surprise and appreciation’.
- 4.36 The important ‘feature’ that goes to this, communicating wider rural setting, is the view of a ‘field margin’. A field margin is not a landscape comprised of a mosaic of fields. Thus, all the HTP is suggesting is the maintenance of a margin of open land inside the A64 communicating the open condition of the Green Belt inside the Ring Road. A margin can be defined by landscape and it is described as important simply for its openness. The settlement edge can be glimpsed from parts of the Ring Road already, in varying degrees.

Setting Considerations

- 4.37 Ultimately, these matters are matters of setting, as this is treated in statute, policy and guidance/best practice.
- 4.38 First, and uncontroversially, HE make no allegation of a setting impact on any heritage asset, including on that collection of assets in Heslington which is nearest the site. There is no view of the Minster from ST27 or across it, and the land does not figure in our appreciation of the Minster or contribute anything specific or particular to its significance. Hence, and in my opinion, the land is not in the setting of the Minster.
- 4.39 That being so, and the Minster enjoying the highest position in the historic city, there can be no proper setting relationship with any other designated asset comprising the historic core.

- 4.40 By 'proper' I mean a setting relationship that is quantifiable and demonstrable as established through inter- or co-visibility.
- 4.41 Historic England best practice guidance, GPA3 (Appendix 5.0) emphasises that setting relationships are ones, mostly, deriving from visual interactions and that in the absence of these there needs to be some demonstrable and particular other relationship. Such a relationship could be established acoustically or through another sense, smell obviously. There is no sensory relationship at play here, between the core and the edge.
- 4.42 Setting relationships can, on the facts of any case, be created by reason of function or historical connection. No such connection is alleged between ST27 and any designated heritage asset at all, still less any designated asset in the historic core of the City.
- 4.43 Ultimately, this part of the HTP, and the core of HE's objection, turns on an abstraction, an idea about York in its settings, assuming the larger part is co-terminus with the historic city. This idea is not based on the direct experience of any asset.
- 4.44 And anyway, and as noted already, all the HTP calls for is a field margin, a buffer sitting inside the Ring Road (and presumably outside too), and the provision of such buffers on the edges of Green Belt and adjoining major roads is standard practice.

5.0 THE COUNCIL'S HERITAGE IMPACT APPRAISAL OF THE ST27

- 5.1 The Council deals with the historic dimension of edge of settlement openness in its Heritage Impact Assessment, published in September 2017 as part of its pre-publication Reg 18 consultation.
- 5.2 The Council assesses its preferred allocation at pages 68 through 70 (Appendix 3.0), with reference to criteria to be found in the HTP (Appendix 4.0).
- 5.3 The Council found no impact on the City's strong urban form, and no real effect on its compactness taking the existing campus into account.
- 5.4 The Council did consider (bottom page 68) whether the allocation would harm the relationship of the City to surrounding historic villages taken in combination with ST15, New Elvington. The paper does not explain which villages in particular it has in mind (it could be Heslington), so I cannot comment except to refer back to my earlier analysis of the HE objection, at Section 2.0 of this statement.
- 5.5 If Heslington is one of these settlements, then practically it has already become part of the greater settlement by the arrival and growth of the University itself. On my recent visit, I noted that this interaction was visual. The educational use, and its extent, also changes the character of the place. The ambience of the historic linear settlement (an estate village) along Main Street has been preserved nonetheless, and its identity. I do not think ST27 (as proposed or as the University would like it amended) would encroach materially on its setting, undermining what we can appreciate today about its special interest.
- 5.6 Page 70 deals with the other point raised by HE, under 'Landscape and Setting', concluding that the allocation it is proposed (and by inference so also the University's preference) 'may erode the character and rural setting of the city seen from the Ring Road'. Notwithstanding any buffer setting, the paper continues, the development will, it is said, 'in principle' change the relationship which the southern edge of York has with the countryside to its south...' Pausing there, this observation is a statement of fact. It continues 'and which the historic City of York has to its surrounding villages'.
- 5.7 The Council conclude a landscape buffer is advising to maintain that openness.
- 5.8 I note here that the text on page 70 just cited draws a distinction – which I maintain in this statement – between 'York' meaning the City as a whole and 'the historic City of York', so in fact the heritage impact under consideration is about erosion of green gap between historic settlements
- 5.9 Even on this focused basis, I cannot see just what particular relationship is at play and under threat. Heslington is not named, and neither is Dunnington, Murton or Stockton-on-the-Forest. Without some particular set of relationships or even one single one being alleged, then the University cannot address these concerns or indeed know how to answer them in this expert statement I have prepared for it.

- 5.10 Another way to think of this discussion is to imagine that this Inspector was looking at a section 78 Appeal for a new campus on the site of ST27 or the University's related alternative, whether or not the respective parcel was in Green Belt or out (imagining, that is, no allocation).
- 5.11 If the local authority in that situation refused the proposals, inter alia, on heritage grounds, it would be obliged to adduce a more specific allegation of harm than the generalised assertions on which the HE objection is based. Quite apart from anything else, a decision maker would have to be certain just what asset is being harmed and why. In my own view, the allegation of harm is in this case just too tenuous to be sustained, even on a very broad, not to say generous and uncritical, interpretation of setting.
- 5.12 The point may be moot, because what the nature of the asserted heritage impact (real or illusory, based on an abstraction), the Council do not share HE's objection which reads as one in principle.
- 5.13 In the penultimate part of this statement, I will look briefly at HE's preferred alternative, which is to intensify the existing campus (both phase 1 and phase 2) to the east of Heslington.

6.0 HISTORIC ENGLAND'S PREFERRED OPTION

- 6.1 Historic England have suggested an alternative to ST27 and so also by inference to the University's alternative.
- 6.2 The HE alternative comprises the intensification of both phases of the University campus.
- 6.3 First is the proposition of intensifying the use of the main or original campus site, granted outline planning permission in 1962
- 6.4 When the first volume of the Pevsner came out, in the late sixties, there is not even an entry on the University. Forty years later there is a dedicated entry over about 5 pages, with an interleaved aerial perspective and two photographs and a further note in the introduction of the city's history.
- 6.5 This change in emphasis, from disregard to great interest, reflects the general re-valuation of sixties further education architecture which started in the 1990s. The University has some historic interest as part of the planned, post-WWII expansion of state-funded further education.
- 6.6 The Pevsner entry is commendably concise, and so I direct the Inspector to it, highlighting a few salient points. First the University was founded in 1960, and the first designs date to 1962, the work RMJM, as was known and specifically Mr Andrew Darbishire, its lead designer.
- 6.7 The guide comments that the siting of the buildings in relation to the lake was one of the best of the new university masterplans, visually and structurally, thanks to their integration with the lake, and the repetition of a single module, the notorious CLASP system, across the buildings. This system allowed fast construction but at the price of durability. Within that masterplan a handful of buildings are singled out, the Chemistry, Vanbrugh College, Biology, the Concert Hall and a few more.
- 6.8 The parkland character of the grounds, particularly around the lake and on main approaches, and near some of the colleges, is of high landscape design quality. The buildings are planned as pavilions or colleges, freestanding elements which are in many places subservient to the landscape masterplan
- 6.9 This is a low-density scheme as befitting its Green Belt location. The extent of building coverage is low, some 20% or so including many surface car parks, so significantly less if buildings alone are taken into account.
- 6.10 I do not think there can be any doubt that the campus is of some historic interest and aesthetic value too, and as such in places can be described as a non-designated heritage asset, whether single buildings or landscape features in association with single buildings or groups.

- 6.11 The University is mindful of this legacy and has instructed Historic England to review its estate for designation purposes. Whilst it would be wrong to second guess that exercise I would not be surprised if a few single buildings and landscape areas were either listed or registered, or identified formally as non-designated assets.
- 6.12 Leaving heritage considerations to one side, it would be challenging to achieve the requisite amount of additional accommodation without fundamentally altering at least the landscape character of the campus.
- 6.13 Intensification of the more recent campus, to the east of Heslington, does not present any heritage reason, but intensification here would change the character of the area, introducing a more urban form, The implications of this on Green Belt are dealt with in the landscape submission for the University.
- 6.14 Interestingly, the section Inspector who reported to the recovered (under section 77) application (report 20 March 2007) considered and rejected a similar suggestion, albeit then on the grounds of viability and character, and I see no reason to vary from that conclusion now. The SoS granted consent for the eastern extension to the campus.
- 6.15 That Inspector also, it is worth noting, considered potential visual impacts with the Minster – he found none – and setting impacts on Heslington as an historic settlement. About these he found that the impact could be managed satisfactorily by a landscape buffer. At this stage, there was no concern that the development would dilute the historic city's identity, undermining our appreciation of its special qualities. The potential interaction with the historic core was limited to intervisibility with the Minster (and he found none and none is alleged now).
- 6.16 Therefore, I can see no basis to prefer the HE preferred alternative. It would effect a significant change to the character of Green Belt land and, more to the point (vis a vis my statement) would harm the heritage interest of the first phase of the campus.

7.0 SUMMARY

- 7.1 In summary, then, I conclude the following.
- 7.2 First, the ST27 land (and the University's alternative – I conflate the two for the purposes of this report) does not form part of the setting of any designated heritage asset.
- 7.3 Second, that land is not proximate to any historic landscape feature contributing to the historic structure of the ancient city.
- 7.4 There are no views of the Minster or any other listed building, directly, from or across the land, or from the Ring Road.
- 7.5 The land does not occur on any arterial route of historic interest, linking the historic city of York to any historic satellite settlement. Those settlements are distant from the site and located beyond the Ring Road.
- 7.6 Thus, and applying the setting guidance from HE, I do not identify that the ST27 land contributes to our ability to appreciate anything particular about the significance of the ancient city or indeed of any other asset.
- 7.7 There are no historical associations or functional associations between the ST27 land and any asset, not even Heslington whose agricultural hinterland, historically, included the ST27 and now related land.
- 7.8 The open land separating the present edge of settlement from the Ring Road serves an undoubted landscape purpose, but its relevance to the significance of any heritage asset is limited at best. I have not been able to identify any specific historic associations between this land and the historic city. Fulford to the south and west is the site of a Conquest-period battle, but that is some distance away (about 2.5 km, WSW of the allocation edge). Hull Road to the north of the University (the modern A1079) is understood to reflect the alignment/position of a Roman Road entering from the east. This is location about 800—1000 metres or so to the north of the northern edge of the allocation (depending on the point where the measurement is taken) and interposing is the University's eastern campus and later suburban development.
- 7.9 And anyway, even the Council, which contends some degree of relevance, accepts the land may be developed acceptably by means of leaving a landscape margin or buffer.
- 7.10 One premise of the HTP, and also of the HE objection, is based on an abstraction, which has a subjective character to it. The HTP recognises its own limitations as involving subjective judgment. The simple way to express this is to ask whether any party driving around the Ring Road would think of York as an ancient place when s/he looks across the carriageway or shoulder to the land and beyond. Some, steeped in the abstraction, might; others, not, wouldn't, or so I conclude. . And even those

possessed of special, expert understanding require some mental gymnastics to conflate the historic city of York with this piece of unremarkable farmland and the experience of dual carriageway Ring Road.

- 7.11 Historic England's alternative – the densification of the existing campus – has the unintended, and arguably perverse, consequence of undermining the aesthetic and historic value of the phase 1 campus and also of introducing dense forms of development which add to the impact of existing development on Green Belt.

DR CHRIS MIELE IHBC MRTPI FRHS

SENIOR PARTNER

MONTAGU EVANS LLP

March 2018

Appendix 1

Miele CV and List of Publications

Chris Miele BAHons MA PhD MRTPI IHBC FRHSFSA



Position

Partner

At Montagu Evans since

2006

Date & Place of Birth

6th November 1961, Washington DC

Main Areas of Expertise

Planning & the Historic Environment

Professional Affiliation

Member, Royal Town Planning Institute

Member, Institute of Historic Buildings Conservation

Fellow, Royal Historical Society

Fellow, Society of Antiquaries, London

Key Commercial Clients

CIT, Land Securities, Chelsfield LLP, National Grid Property, Delancey, Berkeley Homes, Barretts, Fairview New Homes, Gladedale Properties, Dalia Wanda (China), Telford Homes, Bloor Homes, Hallam Land Management, Galliard, Meyer Bergman

Key Public Clients

Trustees of the South Bank Centre, Trustees of the British Museum, University of Oxford, Sheffield University, Dean and Chapter of Westminster Abbey, University College London, the Architectural Association, Greater London Authority, City of Westminster, Transport for London. Trustees of the Southbank Centre & other Public

Key Projects

- Admiralty Arch, Prime Investors
- United States Embassy, Grosvenor Square
- British Museum
- Commonwealth Institute
- South Bank Centre (over 12 years)
- Elizabeth House
- One Nine Elms
- Ram Brewery
- Fleet Marston Sustainable Urban Extension, Aylesbury
- Bow Street Magistrates' Court and Police Station

Professional Experience Includes:

- 2004-2005, Senior Planning Director, RPS Planning. Experience included major infrastructure projects, expert evidence at complex planning inquiries, and other development projects of a significant scale, for a range of private and some public clients.

- 1998- 2004 Director, Alan Baxter & Associates, Advising on planning and related urban design matters affecting the historic environment, to inform emerging design proposals; masterplanning, conservation plans and urban design studies; drafting planning policy guidance for historic sites

- 1991-1998 Historic Buildings Advisor, English Heritage. Experience included providing advice on listing and in support of English Heritage's statutory role in relation to listed building and conservation area consents and planning applications. Advice to local authorities on conservation area designations.

Areas of Expertise

All aspects of PLANNING, URBAN DESIGN & THE HISTORIC ENVIRONMENT with particular expertise in:

- Concept design and detailed approach to historic buildings and new development in historic areas; conservation and management plans; conservation area appraisals, heritage assessments; expert witness work; historic landscape analysis; historic building analysis and recording; masterplanning/development frame works in the historic environment; heritage impact assessments; representations and advice spot listings, delistings and certificates of immunity from listing; experience of scheduled monument consents; historic landscape and urban characterisation; historical research.
- Experience of educational, museum and gallery; hotel and restaurant; residential; mixed use town centre schemes.

ChrisMiele BAHons MA PhD MRTPI IHBC FRHSFSA

Published Works

- 'Scenes of Clerical Life: the Young Scott', in G G Scott RA, ed by P Barnwell (Shaun Tyas, forthcoming).
- 'Community Heritage' and other Victorian Myths: Reflections on the English Experience', ed. Melanie Hall, *The History of Preservation: International Perspectives* (Ashurst, 2013).
- *Forgotten, Lost and Restored*, joint author (Hackney Society, 2012)
- 'Gothic Sign. Gothic Realia: Reflections on the Holy Sepulchre', in *Architectural History*, 2010.
- 'Architectural Representation', *Celebrating a Century of the Victorian Society: Essays and The Anatomy of a Georgian Villa, Danson House*, author (English Heritage 2009)
- *The Supreme Court of the United Kingdom: History, Art, Architecture* (Hardcover), editor and contributor (2010)
- *From William Morris: Conservation and the Arts and Crafts Cult of Authenticity*, editor and contributor (2005)
- "English Antiquity: Saxonism and the Construction of National Architectural Identities". In *Architecture and Englishness, Con. Proceedings Society of Architectural Historians*. (2005), ed. I. Dungavell and D. Crellin.
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- *London Suburbs*, gen ed. C Miele, technical ed. Kit Wedd, introduced by A Saint. Also contributor to first chapter: 'From Aristocratic Ideal to Middle-Class Idyll', (English Heritage, 1999), pp. 31-60.
- "The Battle for Westminster Hall", *Architectural History* (British Society of Architectural Historians) vol. 41 (1998), pp. 220-244.
- 'Robert Adam, Marlborough House and Mrs Fitzherbert: "The First Architect of the World in Brighton"', *Sussex Archaeological Collections*, vol. 136 (1998), pp. 149-175.
- "Real Antiquity and the Ancient Object", in *The Study of the Past in the Victorian Age*, ed. V Brand, intro. By Chris Brooks, *Oxbow Monographs* no. 73 (1998), pp. 103-125.
- *Morris on Architecture*, ed by C Miele (Sheffield, 1997). A collection of William Morris' lectures on building and architecture, with a critical introduction and annotations.
- "The First Conservation Militants", in *Preserving the Past*, ed M Hunter (Stroud, Gloucs., 1996), pp. 17-37.
- "Art or Craft? Morris & Co Revisited", *The Victorian Society Annual*, 1996, pp. 15-21.
- "The Conservationist", in *William Morris*, ed by Linda Parry (Victoria & Albert Museum, Exhibition Catalogue, 1996), pp. 72-90.
- "Their Interest and Habit. Professionalism and the Restoration of Medieval Churches", in A Saint and C Brooks (Manchester, 1995), pp 151-171.
- "A Small Knot of Cultivated People: The Ideologies of Protection", *The Art Journal* (American College Art Association: special issue on Conservation and Art History), vol. 54 (Summer 1995), pp. 73-80.
- "The Restoration of the West Front of Rochester Cathedral: Antiquarianism, Historicism and the Restoration of Medieval Buildings", *The Archaeological Journal*, vol. 151 (1994), pp. 400-419.
- *Hoxton* (Hackney Society Publication, London, 1993)

Appendix 2

Historic England Letter of Objection, 30 October 2017

Freepost RTEG-TYYU-KLTZ,
City of York Council,
West Offices,
Station Rise
YORK YO1 6GA

Our Ref: HD/P5343/02

Your Ref:

Telephone: 01904 601977

30 October 2017

Dear Sir or Madam,

City of York Local Plan: Pre-Publication Draft

Thank you for consulting Historic England about the Pre-Publication Draft of the Local Plan.

General Comments

Over the past few years, as part of the background work on the emerging City of York Local Plan, the Council has undertaken a great deal of work to identify the various elements which contribute to the special character and setting of the historic City. This work has helped to provide a framework against which to consider not only the appropriateness of the development strategy for the future growth of the City, but also the individual sites where that growth might be accommodated.

We welcome the intention to limit the amount of growth which is proposed around the periphery of the built-up area of the City. Such a strategy will help to safeguard a number of key elements which have been identified in the *Heritage Topic Paper* as contributing to the special character and setting of the historic City. These include its compact nature, the views towards the City from the ring road and the relationship of the City to its surrounding settlements.

However, the reduction in the amount of development on the edge of the City is partly dependent upon two elements, the deliverability of which, at the moment, is unclear. The first of these is York Central (Site ST5) and the second is the two new free-standing settlements (Sites ST14 and ST15). Moreover, whilst the development of these areas may provide part of the solution to safeguarding a number of important elements identified in the *Heritage Topic Paper*, their development could also, potentially, harm other aspects that contribute to York's special character. The Plan will need to demonstrate that these areas can

deliver the scales of growth anticipated in a manner commensurate with safeguarding those elements which make York such a special place.

York Central - The amount of development required on the edge of the City and in its surrounding settlements is very much predicated on being able to deliver a sizeable proportion of the plan's new housing requirements within the York Central site. Whilst we whole-heartedly support the principle of the redevelopment of this large brownfield site and in maximising its development potential, we remain to be convinced that the quantum of development being proposed is actually deliverable in a manner which will not only safeguard the significance of the numerous heritage assets in its vicinity but also not have significant knock-on effects upon the historic core of York. Consequently, there needs to be a lot more work done to demonstrate just how 1,500 dwellings and 61,000sq m of office floorspace can be created on this site.

The new free-standing settlements - Although we have raised concerns in the past about the principle of these two large incursions into the open countryside around York, however, as part of the strategy for accommodating York's assessed development needs, we do consider that there is considerable merit in continuing to explore the potential offered by these new settlements. Whilst such an approach clearly affects the openness of the Green Belt in those locations (and, as a consequence, will result in harm to certain elements which contribute to the special character and setting of the historic City), nevertheless, the degree of harm could be far less than would be caused should the housing in those settlements be located, instead, on the edge of the existing built-up area of the City or in its surrounding settlements. As such, a strategy in which part of York's development needs are met in new free-standing settlements beyond the ring road might help to safeguard the size and compact nature of the historic city, the perception of York being a free-standing historic city set within a rural hinterland, key views towards York from the ring road, and the relationship of the main built-up area of York to its surrounding settlements.

The size of these settlements and their location, as currently indicated in this latest consultation, appears to have taken into account of the relationship which York has with its existing surrounding villages – an element which has been identified in the *Heritage Topic Paper* as being part of the character of the City. It is also apparent that they have been designed to ensure that they do not threaten the individual identity or rural setting of their neighbouring villages, the green wedges that penetrate into the urban area, and important views from the ring road. We would have significant concerns were the size of either of these

settlements to increase (either in this or subsequent Plan periods) beyond the boundaries currently shown.

Despite raising concerns during the last two consultations, it is, still, by no means clear what impact the infrastructure necessary to deliver these new settlements will have upon York's special character and setting. This aspect is of paramount importance. A grade-separated junction on the A64 to the south of the University, for example, to access Site ST15 could cause considerable harm to the setting of the City in this location.

Consequently, at this stage, we consider that there is merit in exploring the potential of the two new settlements based on their size and location shown in this current consultation. However, there is considerable work still to do to demonstrate that the infrastructure necessary to deliver this scale of housing can be achieved in a manner which does not harm other elements which contribute to the special character and setting of York.

Any support for these settlements is given on the basis that it can be demonstrated that they are a key component of a wider strategy designed to achieve the protection of key elements which contribute to the special historic character and setting of York and that they will be delivered in a manner which will minimise any harm to the rural setting of the City.

The University - We have particular concerns about the area identified for the future expansion of the University and consider that further consideration needs to be had to how the growth of this important institution might be delivered in a manner which best safeguards the elements which contribute to the setting of this important historic City.

In terms of other aspects of the Plan, despite reduction in their size and/or alterations to their configuration, several of the sites do not appear to have taken account of the elements which the Council has identified as contributing to York's special character. We have set out below, where we consider amendments need to be made to address their shortcomings.

The need to better-understand the development potential of all the Strategic Sites – Meeting the assessed development needs of the City for the next fifteen years in a manner compatible with conserving York's historic character is clearly a huge challenge. We have already expressed concerns about the potential harm which the scale of development proposed on some of the sites (such as York Central) might have upon the historic character of the City. Should the housing or employment figures increase over those currently provided for in the Pre-Publication Draft, this is likely to cause significant problems for York's historic environment. In order to better-understand the potential of those sites that it is proposing to

Page	Section	Support/ Object	Comments	Suggested Changes
				<i>making a positive contribution to its significance”</i>
70	Policy SS22 – Site ST27 (University of York Expansion Site)	Object	<p>Notwithstanding the caveats within the Planning Principles regarding the limits on the development footprint of any new development and for an <i>“appropriately landscaped buffer between the site and the A64”</i>, this proposal could harm two elements which contribute to the special character of the historic City.</p> <p>Firstly, this area is prominent in views from the A64. The expansion of the University to the extent of the area identified would bring development very close to the Ring Road. This will fundamentally change the relationship which the southern edge of York has with the countryside to its south. It will also alter people’s perceptions when travelling along this route about the setting of the City within an area of open countryside.</p> <p>Moreover, it is by no means certain that the requirement for an <i>“appropriately landscaped buffer”</i> between the site and the A64, will not, itself, further harm the openness of the Green Belt in this location. Previous landscaping schemes by the University in this part of the City have simply resulted in earth bunding an alien features in the flat landscape to the south of the City.</p> <p>Secondly, the expansion of the university towards the ring road could also harm the relationship which the historic city of York has to the surrounding villages - another element</p>	The future expansion of the University should be restricted to within the Campus East and consideration should be given to the expansion of the university in a northerly direction onto Site ST4 instead.

Page	Section	Support/ Object	Comments	Suggested Changes
			<p>identified in the <i>Heritage Topic Paper</i> as contributing to the special character of York. This relationship relates to not simply the distance between the settlements but also the size of the villages themselves, and the fact that they are free-standing, clearly definable settlements.</p> <p>The expansion of the University would effectively reduce the gap between the edge of the built up area of the City and this proposed new settlement at Elvington Lane (Site ST15) to 1.6km.</p>	
71	Policy SS23 – Site ST19 (Northminster Business Park)	Object	<p>In order to retain the separation between the Business Park and nearby villages, the southern extent of this area should not extend any further south than the existing car park to the south of Redwood House.</p> <p>Without this reduction, the development of this area would threaten the separation of Northminster Business Park from the village of Knapton which would be just 250 metres from the southern boundary of this area.</p>	Amend the extent of Site ST19 so that the southern extent of this area extends no further south than the existing car park to the south of Redwood House.
72	Policy SS24 – Site ST37 (Whitehall Grange)	Object	<p>This site forms part of the green wedge that extends into the north of City which is centred on Bootham Stray. Although there are a handful of buildings on this particular site, it is clearly perceived as a part of this open area. The loss of this site and its subsequent development would result in the considerable narrowing of this wedge and harm one of the key elements identified in the <i>Heritage Topic Paper</i> as contributing to the special character and setting of York.</p>	Deleted Site ST37
75	Policy EC1, site E16 (Poppleton Garden Centre)	Object	<p>Whilst we have no objection to the redevelopment of that part of the site which is currently occupied by buildings,</p>	Reduce the extent of Site E16 to exclude the currently undeveloped

Appendix 3

**Relevant extract from the City of York Heritage Impact
Appraisal, Pre-publication (Reg 18 Consultation) September
2017**



YORK

CITY OF YORK
HERITAGE IMPACT APPRAISAL

Pre-publication (Reg 18 consultation) September 2017

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Separate Annexes

ANNEX 3: STRATEGIC SITES APPRAISAL

ANNEX 4: HOUSING AND EMPLOYMENT ALLOCATIONS RAPID APPRAISALS

ANNEX 5: ALTERNATIVE SITES RAPID APPRAISALS

																			<p>Screening may partially assist in mitigating against the erosion of the semi-rural setting of the airfield, however a decrease in distance between the Industrial Estate and farmsteads would be inevitable.</p>	
<p>Policy SS22: University expansion Site ref ST27</p>																			<p>The Heritage Impact Appraisal (SITES) identifies a number of negative impacts likely as a result of developing in this location. Policy SS22 addresses these as follows (<i>HIA (SITES) comment in italics</i>, with HIA (POLICIES) response in normal text):</p> <p>ST27 will provide 21,500sqm of B1b employment floorspace for knowledge based businesses, including research and science park uses and other higher education uses. A development brief will be prepared covering landscaping and design requirements.</p> <p><u>1. Strong Urban Form</u> <i>The site makes a neutral contribution to this characteristic.</i> No likely impacts identified</p> <p><u>2. Compactness</u> <i>Development here will enlarge the campus area by creating employment land. Impact on the city's compactness may be classed as neutral-minor as development already exists in this area and the campus is its own separate 'settlement'. Low Lane provides the southern boundary for the campus at present, development would extend this up to the ring-road.</i></p> <p>The expansion of the university towards the ring road could harm the relationship which the historic city has to its surrounding villages. This relates both to the distance between settlements and to reading villages as free-standing, clearly defined settlements. There is concern that, in conjunction with the proposed new</p>	<ul style="list-style-type: none"> - Implement this policy alongside others in the Plan (especially those contained within Section 8: Placemaking, Design and Culture) to mitigate and minimise harm as well as maximise enhancement opportunities. - Ensure development is informed by clear appraisal and understanding of the site's characteristics and context (particularly views), and that future development masterplanning is contextually relevant and references the best in contemporary placemaking. - Incorporate the design intentions/philosophy of Heslington East into the extended campus. - Non-intrusive archaeological assessment including a desk-based assessment, geophysical survey and

								<p>settlement ST15, the expansion of the university would effectively reduce the gap between the edge of the built-up area and this new settlement to 1.6km, with the potential for serious harm to the city's compactness.</p> <p><u>3. Landmark Monuments</u> <i>The site makes a neutral contribution to this characteristic.</i> No likely impacts identified.</p> <p><u>4. Architectural Diversity</u> <i>Poor architectural design would be detrimental to the generally high quality of buildings and craftsmanship in York. Poorly designed buildings will have a negative impact on the city in general.</i></p> <p>Policy seeks to enhance and continue the parkland setting of the existing university campus, with new buildings being of high design standard. The stated development brief will provide a design framework within which the university expansion will emerge – there is an opportunity to develop a scheme which represents the best of contemporary design.</p> <p><u>5. Archaeological Complexity</u> <i>Prehistoric-Romano-British settlement and activity known across the existing campus site to the north. This has already been mitigated against through excavation/recording prior to the construction of the new campus. Further archaeological features may exist outside the existing campus boundary.</i></p> <p><i>In the area south of the existing campus several non designated landscape features exist such field boundaries and ridge and furrow – condition unknown.</i></p> <p><i>Long Lane is shown as a track/boundary on the 1852</i></p>	<p>field walking and excavation of archaeological evaluation trenches must be carried out. The results will be used to assess the nature and significance of any archaeological deposits on site.</p> <ul style="list-style-type: none"> - The results of the geophysical survey and evaluation trenches should influence the layout of the development and inform archaeological mitigation strategies. - The impact of the development on the significance of archaeological deposits must be mitigated through a programme of archaeological excavation, community involvement, analysis, publication and archive deposition. - The precise extent and content of the mitigation strategy will depend on the content of the masterplan for the site. - The final development must incorporate interpretation of the archaeological and historic development of
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									<p><i>OS map although is not named.</i></p> <p>Development of the site would have a destructive impact on any surviving archaeological deposits or landscape features. Policy makes no reference to mitigating measures.</p> <p>6. Landscape and Setting <i>This area provides part of the rural edge setting and open countryside surrounding York. It has been identified as protecting the rural setting. Development would be detrimental to the landscape and setting of the city. Development across this site may erode the character and rural setting of the city visible from the ring road. The site will have a strong influence on the setting and context of Heslington East campus and views of it from the A64. The existing campus is designed to include views across the lake to open countryside beyond, which could be harmed. Development in this area is not directly next to Heslington, however it brings development closer to the rural community of Grimston.</i></p> <p>Development here will inevitably result in the loss of part of the rural setting of York, bringing development very close to the Ring Road. Buffering and green infrastructure may reduce its impact, but development will 'in principle' change the relationship which the southern edge of York has with the countryside to its south, and which the historic City of York has to its surrounding villages.</p> <p>Policy advises that an appropriately landscaped buffer is provided between the site and the A64 in order to mitigate heritage impacts and to maintain key views to the site from the south and its setting from the A64 to the south and east, and; any future scheme must enhance and continue the parkland setting of the existing</p>	<p>site in order to deliver public benefit and enhance knowledge of the site for residents.</p> <ul style="list-style-type: none"> - Move the eastern edge away from the ring road and buffer the site to push and screen the development from the ring road. - Significant green infrastructure to mitigate effects will be required. - Historic grain of landscape should be reflected in design of new development with any significant features incorporated as they are. - Green infrastructure required against the western edge of the development to mitigate against possible harmful impacts to views from the Conservation Area of Heslington. - Set the allocation further away from the footpath/lane and/or create a new landscape context for the footpath/lane. - Buffer and screen western edge of proposed site. Do not encourage any further development
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Appendix 4

Heritage Topic Paper Update, September 2014



YORK

CITY OF YORK
HERITAGE TOPIC PAPER UPDATE
September 2014

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Definitions:

In the paper, the term City of York is used to denote the entire area which is administered by the City of York Council.

The terms historic city and historic core refer to the urban nucleus defined by the city walls, the approach roads to the city walls and the ancient Strays.

1: Purpose

1.1 The historic environment of the City of York is internationally, nationally, regionally and locally significant. This is recognised nationally through existing statutory designations that apply to heritage assets in the City of York and is evidenced locally through the formal bid by City of York Council to gain World Heritage Site status at the international level and a community-driven initiative to adopt a Local Heritage List of locally significant buildings, structures and spaces.

1.2 The historic environment of the City of York is a complex mixture of landscape, buried archaeological remains, buildings and structures representing almost 2000 years of urban growth that underpins the significance of the contemporary city. Past events, decisions and actions, some nationally significant have also helped shape the modern city. The events, decisions and actions that will occur as a consequence of implementing Local Plan policy will in part determine what the historic environment of the city will be in the future. The historic environment is a contested space. Different groups and individuals bring different concepts, analyses and value judgements to this space making it very difficult to clearly define York's special qualities in a way that helps investors, developers and others to determine how they may contribute to better revealing and enhancing them for the present and future.

1.3 However, it is vitally important that Local Plan policy is based on a shared understanding which can provide a view of the special character and significances of this contested domain.

1.4 This document therefore sets out to examine and assess existing evidence relating to the City of York's historic environment and how it can be used to develop a strategic understanding of the city's special qualities and its complex 2000 year history. This assessment has been used to propose six principal characteristics of the historic environment that help define the special qualities of York. The document is set out as part of the evidence base for the Local Plan.

2: Historical and Spatial Introduction

2.1 The historic city rises from and dominates the low-lying Vale of York, one of the great lowland plains of England. The setting is provided by the geological context of the Vale: the limestone ridge and Pennine foothills to the west; the Wolds and Howardian Hills to the east; the glacial moraine crossing the Vale breached by the Rivers Ouse and Foss; the Derwent valley to the east; and the post-glacial deposits accumulating within and between the courses of the river valleys and their tributaries.

2.2 This geological context provides the basis for the natural colonisation and development of the landscape and its subsequent transformation by human activity in the period since approximately 10000BC. The geological context also provides the raw materials which are used and visible in the historic buildings and structures of the City of York.

2.3 It also provides the basis for the important long-distance views both into and from the historic city which emphasise the special role and relationship of the historic city in the Vale of York, Yorkshire and beyond. The Minster can be seen from elevated viewpoints located as far away as Garrowby in the east, Sutton Bank to the north, Hazelwood Castle to the west and Alkborough, North Lincolnshire to the south. On clear days views from the Minster and from other elevated viewpoints within the City include the Pennines, the North York Moors and Wolds, Selby and the Humber estuary.

2.4 The historic city is an urban site, continuously occupied for almost 2000 years. It is characterised by a tightly knit, compact core defined by the City Walls, the visual and physical presence of York Minster, the historic street pattern, tenement plot boundaries, and the Rivers Foss and Ouse. Beyond the historic core the character is further defined by ancient arterial roads and commons (the green wedges formed by the Strays), the river valleys, and the pattern of villages set within a predominantly flat landscape of pasture, arable, woodland and wetland.

2.5 The City of York contains complex archaeological deposits from all periods, culminating in the deep (up to 10m), frequently waterlogged deposits that are preserved within the historic city.

2.6 The City of York exhibits layering, both vertical and horizontal, of all periods with no single period providing the dominant theme.

2.7 The spatial development of the historic core of the City of York can be seen as a series of chronological expansions from the historic core which annexe surrounding settlements, patterned by the arterial roads (many with their origins in the Roman period), the ancient commons and Ings, and the natural topography. These chronological expansions can be read through spatial progressions from centre to periphery.

2.8 This chronological and spatial expansion of the historic city terminates in a clear frontier where the rural characteristics of farmland and woodland take over provide a buffer zone between the villages and the core. This urban edge sits clearly within the encirclement established in the late 20th century by the construction of the outer ring road.

2.9 A similar chronological and spatial progression from centre to periphery can be observed in most of the villages within the City of York.

2.10 York therefore provides an exemplar of continuity within the natural and historic environment. This theme of continuity is punctuated by periodic transformational episodes:

- the establishment of the Legionary Fortress and urban centre from AD71 by the Romans;
- the establishment of regular tenement plot boundaries and streets in the 10th century within the historic city;
- the replanning of large tracts of the historic city through the creation of two castle precincts, a new Minster and St Mary's Abbey in the late 11th century;
- the reorganisation of the rural landscape through the creation of planned villages and moated and ecclesiastical sites in the 12th century
- the "opening up" of the historic city through the loss of ecclesiastical precinct boundaries in the 16th century;
- the cultural, social, aesthetic and architectural renewal in the 18th century
- the impact of the railways (townscape, landscape and communication) and associated industrial development (e.g., chocolate, cast-iron, railway, gas) in the 19th century; and,
- 20th century expansions:
 - ◆ suburban expansion from historic core in the 20th century;
 - ◆ expansion and development of villages post-World War II; and
 - ◆ creation of outer ring-road and out-of-town shopping and business centres in the late 20th century.

3: Methodology

3.1 This paper provides a qualitative and quantitative evidence base for the Local Plan. It is not intended to be, nor can it be a definitive work. However, it does set out those factors and themes which have influenced York's evolution as a city. It has been written by the Design Conservation and Sustainable Development team who provide a specialist advice service within City of York Council. Significant input has been provided by Integrated Strategy Unit Officers working on the Local Plan, the Built and Historic Environment sub-group of the Environment Partnership and the Conservation Areas Advisory Panel. In addition, valuable input has been provided by English Heritage.

3.2 The key part of this paper is the attempt to present in a linear narrative form a four dimensional framework for exploring the special historic character and significances of the City of York. The narrative unfolds through three broad categories: Factors (Section 4); Themes (Section 5); and Characteristics (Section 6). The Factors are large-scale, almost deterministic environmental elements with which humans have interacted within the City of York and produced the historic environment. The Themes provide a high-level categorisation which allows the narrative of human action to develop across chronological divisions. The special historic character of the City of York emerges as both the tangible and intangible expression of these themes in the City of York today. The characteristics provide both the means of describing this special historic character and of testing the potential impacts of policy statements.

3.3 It is clear from this linear narrative that the evidence base:

- is incomplete and that there is a requirement for further specific studies which will provide more detailed evidence for this exploration of the special historic character of the city; and
- it is subjective and that at any one moment the constituent parts of the categories can change and be redefined. The results of any further studies will demand a review of this paper and the process of review may challenge parts of the narrative.

3.4 This is a positive aspect of this methodology, for it acknowledges the dynamic nature of the historic environment and of the values and significances attached to it. There is, therefore, no specific point at which the special character can be determined definitively. The key is that there is a continuing process of observation, reflection, interpretation and action within strategic policy development and implementation.

4: The special character and significances of the City of York: Factors

4.1 The following key factors have guided the way in which humans have interacted with the environment of the City of York and produced the historic environment whose special character is the subject of this paper

Geology

4.2 The City of York lies within the Vale of York, a low-lying alluvial basin stretching for over 50 km from Northallerton in the north to the Humber estuary in the south. To the east lie the North York Moors, Hambleton Hills and Howardian Hills, which consist mainly of Jurassic sandstones and limestones, and the Yorkshire Wolds, largely comprising Cretaceous chalk. To the west, low foothills of Permian dolomitic limestones bound the vale, beyond which are the Carboniferous uplands of the Pennines. Triassic sandstones and 'marls' form bedrock beneath the vale, but Quaternary sediments, principally of glacial, lacustrine (lake sediments), aeolian (wind blown material) and riverine (river sediments) origin, largely conceal these rocks. Most of these sediments were deposited during the last cold stage (the Devensian) and the succeeding post-glacial Stage (the Holocene). The York and Escrick moraines mark the ice margin during the last glacial maximum and form two key geological and topographical features in the modern landscape.

Climate

4.3 Natural climate change so far in the Holocene has seen the area move from cold sub-arctic conditions to the temperate climate enjoyed today.

4.4 The Vale lies in the rain shadow of the Pennines so has lower rainfall than areas to the west. It is prone to fog, frosts and cold winds in winter, spring and autumn. In summer the average maximum temperature is 22°C (72°F). The average daytime temperature in winter is 7°C (45°F) and 2°C (36°F) at night. Snow can fall in winter from December onwards to as late as April but quickly melts. The wettest months are November, December and January. From May to July York experiences the most sunshine with an average of six hours per day.

4.5 Climate change will see an increase in average maximum temperatures, increased frequency of hot and cold extreme weather events, and a reduction in average annual rainfall accompanied by an increase in extreme rainfall events and an increase in the number of dry spell events. Increases in extreme rainfall are likely to lead to increased flooding in the City.

Topography

4.6 The City of York occupies a low lying, mainly flat landscape, with the glacial moraines providing subtle, locally noticeable topographic variations, such as The Mount and Holgate. The floodplains and courses of the Ouse, the Derwent, and the Foss create much of this flat landscape and are key topographic features. There are frequent streams and drainage channels which link with the main rivers which cross the vale.

4.7 The landscape has a generally large-scale, open, well tended character where production is the main emphasis of land management. The historic city has a dominant influence - the tower of the Minster is visible for miles around. Beyond the historic city there are villages of varying scale and character with brick farmsteads scattered in between.

Landscape

4.8 The landscape of the York area can be broadly characterised as being relatively flat and low lying agricultural land dominated by the wide flood plain of the River Ouse, rising slightly to the east. The Rivers Ouse, Foss and Derwent are important green corridors as well as important determining factors for the location of the historic city. The ancient strays and ings (the “green wedges”) extend from the open countryside into the heart of the main urban area and have provided and will continue to provide spatial constraints for development.

4.9 York’s green infrastructure also includes eight Sites of Special Scientific Interest (SSSI) two of which (Strensall Common and Derwent Ings, the latter also a RAMSAR site) are also of international importance. There are also numerous designated Sites of Interest for Nature Conservation and recreational open space.

Resources/Materials

4.10 Local and regionally sourced natural and manufactured materials form the majority of materials used in the City of York up to the 20th century. The 20th century has witnessed the proliferation of non-local, non-regional natural materials.

4.11 In the prehistoric period, construction was almost totally in timber augmented by vegetable and animal derived materials. The use of timber in prehistoric structures is evidenced only by post-holes and other features recorded through archaeological interventions.

4.12 Timber framing characterises the domestic structures of the medieval city. Brickwork exists from at least the fourteenth century with bricks coming from tileries in Walmgate and from around Drax. This tile manufacture is the clue to the shape of bricks,

originally thin and broad and long, becoming larger with advances in kiln technology from the eighteenth century onwards. The advent of railway transportation brought in bricks of grey/buff hue or deeper red/browns in the nineteenth century compared with the warmer local hand-made clamps. These developments can be traced through roofing materials too with flat plain clay tiles or curved pantiles characterising York up to the late eighteenth century when greenish Lake District slates were introduced. With the advent of the railway, grey Welsh slates began to be used.

4.13 From the Roman period through to the 18th century there was use of stone for the grander buildings: churches, the city walls, guildhalls, courts and prisons. From around Tadcaster, good Magnesian Limestone was available from which the Minster is built. Few other buildings after the medieval period used this stone although some monastic sites were plundered and materials reused and recycled. Small amounts of the less durable calcareous sandstone from East Yorkshire, but greater quantities of the West Riding sandstones were utilised on buildings as well as pavements - the large examples often employed to span pavement cellars. Millstone Grit is generally characteristic of the Roman period and 19th century only.

4.14 Brick and tile was a characteristic material in the Roman settlement and can be seen in the upstanding remains of the legionary fortress defences in the Museum Gardens and at the rear of the Library. Archaeological evidence for Roman tileries exists at Peaseholme Green.

4.15 Craft specialisation and expertise associated with the use of these materials can be seen in all chronological periods. Of particular note are the innovations employed by the master masons in construction of the minster, the craft and art of the glaziers who produced stained and painted glass in the medieval period and the expression of emerging architectural style and form in the 18th century.

5: The Special Character and Significances of the City of York: Themes

5.1 The special historic character of the City of York is expressed through the themes set out in this section. The visible and hidden spatial and physical expression of activities within these themes form the individual and group assets, which together make up the historic and natural environment.

Economy (Farming, Trade, Industry, Tourism)

5.2 This theme groups together human interactions with the environment that have produced economic activity ranging from prehistoric subsistence activities to modern retail and industrial activity.

5.3 Apart from finds of Mesolithic flint artefacts in later contexts, there is no evidence for human activity in the area between c.10000BC and c.4000BC.

5.4 The emergence of landscape divisions and an agricultural, settled landscape begins in the 4th millennia BC and continues today. The late-prehistoric economy is dominated by agricultural activity.

5.5 The introduction by the Romans of an organised, semi-industrial, economy witnessed an expansion of international, regional and local trade. Locally, pottery and tile manufacture is important.

5.6 This period also saw increased communication links. More extensive use of the rivers and the new road system facilitated an increased scale and pace of change.

5.7 There is a lack of evidence for the nature and extent of economic activity in the immediate post-Roman. However, from the 8th century onwards there is a reassertion of economic activity evidenced in urban/ rural relationships. Local regional and international merchant trading links emerge. There is increased trade and craft specialisation which sees the emergence of social and organisational structures (e.g. guilds), spatial grouping of trades in discrete localities. Significantly, traditional craft skills remain important in the City today.

5.8 Common land (e.g. the Strays), the Ings land, and open fields (many subsequently divided and enclosed) provided the framework for contemporary agricultural activity. The importance of open field agriculture can be seen in the pattern of strips evidenced through the characteristic reversed-S ridge and furrow earthworks and field boundaries and hedges. Where ridge and furrow survives it is often associated with unimproved grassland, an important ecological habitat.

5.9 York has been an important centre for regular markets and fairs in all periods. This role has left significant traces in the historic environment of the City of York.

5.10 The late 18th and early 19th centuries saw the advent of relatively large-scale industrial development. This is characterised by the importation of raw materials, the emergence of tanning, iron-working, gas production. These are strongly associated with the development of water-borne and railway links.

5.11 The manufacture of rolling stock, chocolate and confectionery manufacturing and the growth of industrial-scale flax and flour milling, and brewing characterises the economy of the late 19th and 20th centuries. The development of highly skilled instrument manufacturing emerges in the 19th century.

5.12 The 20th century witnessed the rise and fall of sugar manufacturing in the City and a move from manufacturing in general to a service and retail based economy. Insurance, retail, tourism and public sector employment characterise the late 20th century early 21st century economy.

5.13 The emergence of international and large-scale tourism is a 20th century phenomenon, culminating in the current estimate of 7m visitors to the city each year. Tourism forms a key part of the economy of the modern city. However, York's role as a focus for visitors occupied by leisure and curiosity can be traced back to 17th century. Today, tourism also provides a significant driver for the conservation and interpretation of the historic environment.

Administration (Government, Education, Health)

5.14 It is difficult if not impossible to characterise the nature of tribal "administration" in the City of York in the prehistoric period. Administrative roles did not arise prior to the Roman period. York has been a centre of civil administration since the creation of Eboracum, the Roman legionary fortress in 71AD, and the subsequent emergence of the civilian town. Roman York achieved the status of colonia the highest legal status that could be conferred on a Roman town, probably by c 200AD.

5.15 York has subsequently performed national, regional and local administrative roles across almost 2000 years.

5.16 In the Anglian period (c 400AD to c 866AD) York was certainly a Royal centre. King Edwin of Northumbria was baptised here in 627. By the 8th century the city had a reputation for learning and scholarship, epitomised by the career of Alcuin: educated at the cathedral school in York and destined to be head of the palace school at Aachen and advisor to Charlemagne from 781AD.

5.17 In 866AD, York was captured by the Viking army; in 876AD, the Vikings returned and settled in Northumbria. For nearly 100 years, York was the centre of a Viking kingdom. There were two palaces in the historic city.

5.18 The demise of the Viking kingdom in the 950s AD, the emergence of a unified English kingdom saw the transition of York from a royal and capital centre to an important regional and at times national centre for administration. The emerging role of York as a self-governing polity was recognised through a series of royal charters from AD1154 onwards. These both recognised and anticipated the roles of the York Corporation and the guilds. The disputes in the 13th century concerning the authority of the York Corporation in the Ainsty (a large rural area defined by the Nidd, the Ouse and the Wharfe) anticipate the subsequent extension of local administration in the late 20th century.

5.19 Throughout this time York functioned as a mint, a market centre, a centre for tax collection, and legal administration.

5.20 In the 16th century, the presence of the King's Council in the North established York as the capital of northern England; the government at York effectively prosecuted royal and judicial administration throughout the north of England.

5.21 The establishment of private charities, institutions and schools largely from the 17th century onwards to provide care, assistance and education in the City of York has created a significant footprint in the historic environment.

5.22 From the 17th century, one can trace the focus of local administration in detail through the records of York Corporation: election of civic office-holders; care of the finances and the raising of special rates; admissions to freedom and regulation of trade and industry; repair of such public property as walls, streets, bridges, and staiths; provision of public services as gaols, conduits, sewers, and common crane; and precautions against plague and relief of pauperism and distress. These roles expanded through the 19th and 20th centuries to include education (excluding the private schools and colleges within the City of York) and health.

5.23 York in the twentieth century grew as an industrial town, but not on the scale of its West Riding neighbours. In the later part of the century, it turned more to white-collar employment, in the insurance business, in tourism and in education. The founding of the University of York in 1963, the growth and development of St John's College from its origins as the Diocesan Training College for Schoolmasters opened in 1845 to the University of York St John, the opening of the College of Law in 1989 and the establishment of medical training at the Hull and York Medical School in 2002 has made York a major centre for higher education.

Ecclesiastical/ belief

5.24 The tangible and intangible expressions of belief systems, and in particular Christianity, have had a huge influence on the character and appearance of the City of York.

5.25 There is little evidence for prehistoric ritual sites, though individual finds (eg the Campus 3 Iron Age skull, complete with brain, deposited in a ditch) hint at spiritual beliefs tied in with spatial organisation. Prehistoric burial sites are rare and thus are of great significance when they are identified.

5.26 Roman religious beliefs and practices are much more clearly evidenced through archaeological finds and monuments. Cemeteries dating from the 1st to 5th centuries encircle the historic city; these are of international importance. Temples, evidenced by altar stones and dedication inscriptions, have been found throughout the City of York. Evidence for pre-Christian, Anglian worship and funerary sites is very rare.

5.27 Edwin, King of Northumbria, was baptised by Paulinus at York in 627AD. He was baptised in a wooden structure in which soon after his baptism, was replaced by a church of stone. These events are likely to have taken place within the former Roman principia building and established the site of York Minster. The expression of Christian belief in the City of York has produced a range of structures, artefacts and traditions and events that are of international, national regional and local significance. Most notable in the historic environment are the physical expressions of this tradition that survive from the medieval period: the Minster, St Mary's Abbey, and the parish churches throughout the City of York. The articulation of Christian belief through artistic work has produced an unrivalled collection medieval art expressed in stained glass, statuary, carvings and plays. It is difficult to overstate the physical, social and cultural domination of the medieval city by the practice and expression of Christianity. York Minster is still the pre-eminent structure in the City of York today and it continues to play a significant role in the religious, social and cultural life of the city.

5.28 The impact of the Dissolution in the City of York on this medieval legacy was transformational. The extensive medieval religious precincts were swept away; several parishes were also merged in the 16th century. The 17th and 18th centuries witnessed the development of Protestant Nonconformity in the City. The Society of Friends (Quakers) was established in the city following a visit by George Fox in 1651. This is notable because of the significant role and impact of Quaker families (e.g. Rowntree, Terry) in York in the 19th century.

5.29 Evidence for Roman Catholicism can be traced in the historic city in the 17th 18th and 19th centuries despite the persecutions until the Catholic Relief Acts in the late 18th century. The Bar Convent was founded in 1686. However, it is not until the Irish

immigration of the 1840's that there was a significant increase in the number of practicing Roman Catholics and new churches were built to accommodate them.

5.30 The only evidence for post-Roman, non-Christian belief in the City of York prior to the 20th century relates to the Jewish community. In the 12th century, the York Jewish community was one of the largest and most important in England. In March 1190, an infamous pogrom took place at York Castle; some 150 Jewish men women and children were massacred. This event is of international significance and continues to be important to the Jewish community today. After the expulsion of the Jews from England in the 13th century, there appears to have been no Jewish religious community in the City of York until modern times. The York Hebrew Congregation was formed in 1892 and a room at 9 Aldwark was rented for services that were still taking place there in 1956. Today, there is no synagogue in the City of York, a heavy and enduring legacy of the events of March 1190.

5.31 There is no evidence for Islam or Muslims in medieval York, although Islamic artifacts (most notably coinage) have been recovered from archaeological contexts dating from as early as the 9th century. In 1982, the York Mosque and Islamic Centre was opened and today there is a mosque in Bull Lane.

Military/Defence

5.32 There is no evidence for prehistoric defensive enclosures. The earliest military evidence is provided by the arrival of the Roman Ninth Legion in 71AD. The defensive features of the legionary fortress evolved over the next three centuries. More than 50% of the line of the fortress defences either form or are preserved under the medieval defences between Museum Street, the Multangular Tower, Robin Hood's Tower and the Merchant Taylor's Hall. Significant elements are visible in the contemporary townscape. It is also possible that the Roman civil town on the south-east bank of the Ouse in the Bishophill area was also defended. Temporary Roman camps are located on Bootham Stray and Monks Cross.

5.33 In the post-Roman, pre-Viking period (c410 AD to c876 AD) there is no clear evidence for development or adaptation of the defences round the historic core.

5.34 During the 9th and 10th centuries it is probable that key extensions to the defences were made (a) between the legionary fortress and the River Ouse where Lendal Bridge now stands (b) between the north-east corner tower of the legionary fortress and the River Foss (Merchant Taylors Hall to Layerthorpe) and a possible extension at (c) in Walmgate.

5.35 The medieval defences of the historic city emerge in the form in which they exist in the modern townscape from the 11th century onwards. York Castle and the Old Baille are built by William the Conqueror in AD1067-68. The construction of York Castle is accompanied by the formation of a dam across the mouth of the Foss Valley. This

created an artificial lake which extended from what is now Castle Mills Bridge to Foss Islands Road, Osbaldwick Beck and Monk Bridge in the Foss Valley. This lake, the Kings Fishpool, meant that it was not necessary to construct defences between Red Tower and Layerthorpe (the modern Foss Islands Road). The main gateways into the historic core (apart from Monk Bar) are all constructed in stone by the early 12th century. During the 13th and 14th centuries the defences are completed with the addition of stone walls to the top of the rampart. York is the only place in the UK where town walls are constructed on the apex of the rampart. Chains were installed which could be raised and lowered between Lendal Tower and Barker Tower on the north and Davy Tower and Skeldergate Postern on the south side of the historic city. These controlled access to the city up and down the River Ouse.

5.36 In AD1266 St Mary's Abbey was granted a license to crenellate. The walls around the abbey date from the late 13th century and represent both an ecclesiastical precinct and an additional defensive feature on the north side of the historic city

5.37 During the medieval period, the walls were a physical expression of the importance and role of the city and its Corporation. They controlled access into the city; they allowed the collection of taxes and regulation of trade; they were the focus of ceremony and display. They stood as a secular counterpoint to the looming presence of the Minster, St Mary's Abbey and the other ecclesiastical precincts that dominated the medieval city. The City Walls were on occasion prepared for but rarely used for defence. It was not until AD 1644 and the Siege of York that the walls were properly utilised for their defensive qualities. The walls were hastily repaired, houses around the outside of the walls and on the arterial roads were demolished and defensive outworks were constructed. Many of these outworks were captured by the besieging Parliamentary armies and turned into siege works. With the exception of the lazily rebuilt Marygate Tower, very little evidence of the siege of York is visible in the townscape today.

5.38 Due to its administrative and strategic importance York has been the focus of large scale battles, from the difficult to locate 11th century battles of Fulford and Stamford Bridge, to Towton (AD 1461) and Marston Moor (AD 1644).

5.39 Military quarters in Fulford Road are thought to have been established on the site of the later barracks as early as 1720. Over the following centuries the area developed through acquisitions to include cavalry barracks, a military hospital, an ordnance factory and quay, and married quarters. Beyond Fulford Road, new buildings were constructed and existing buildings taken over (for instance, the De Grey Rooms, Tower House Fishergate, Fishergate House). Drill Halls exist in Colliergate and Tower Street. There has been a military barracks and training area since 1880's on Strensall Common.

5.40 In the 20th century military airfields were established in the City of York. A WWI airfield was created at Copmanthorpe. In WWII airfields were established at Clifton Moor,

Elvington, Acaster Malbis and Rufforth. Associated camps for airmen can be traced at Clifton Backies (now a significant SINC site) and at the rear of the City Art Gallery in the historic core. A Royal Observer Corps Observation Post now functions as sports changing room on Little Knavesmire. In addition, searchlight stations, a decoy site and air-raid shelters and bomb sites survive.

5.41 Formal War Memorials can be found throughout the City of York, and there are informal memorials such as the famous 'Betty's Mirror' in Betty's Tea Room in St Helens Square.

5.42 The Cold War Bunker in Acomb, in use between 1960 and 1990 is a scheduled ancient monument originally designed as a nerve-centre to monitor fall-out in the event of a nuclear attack.

Communication

5.43 The City of York occupies a significant location within the Vale of York. It lies at the point where two rivers cut through the York Moraine and merge.

5.44 The moraine and the rivers will have provided convenient routes for local and regional communications from the prehistoric period onwards. Archaeological finds attest to communication across great distances. A good example is the greenstone Neolithic axes from the Great Langdale 'axe-factories' that have been found at Dringhouses. These objects may have been traded, exchanged or perhaps carried by an individual from the Lake District to the Vale of York. These long-distance routes would have been complimented by a network of local paths and trackways through the landscape.

5.45 In the Roman period, these existing communication routes were extended by the addition of engineered roads and bridges. Archaeological evidence points to the existence of metalled and unmetalled roads and to a bridge across the River Ouse between Wellington Row and Coney Street at this time. Land and water routes linked Eburacum to the wider Roman Empire. Isotopic analyses of Roman skeletal remains and epigraphic evidence demonstrate a diverse city populated by migrants to York from across and beyond the Empire. Raw materials and finished objects were transported to and from York along a complex network of local, regional and national routes.

5.46 In the period from the 5th to the 11th centuries it is reasonable to assume that the rivers continued to provide most effective means of transportation and communication. Archaeological evidence indicates extensive trading/ exchange contacts between York and the continent. The establishment of the Viking Kingdom of York with its extensive national and international links was inextricably tied in with water communication.

5.47 Some of the major Roman roads would have remained in use and to some repaired. The alignment of the main arterial roads (Bootham/ Clifton, Tadcaster Road/

The Mount/ Blossom Street, Heworth Green/ Stockton Lane, Lawrence Street/ Hull Road) follow the line of Roman roads; it is reasonable to infer that these roads were maintained. Certainly much later, in the 14th and 15th centuries, York merchants occasionally made gifts towards the improvement of roads and bridges around the city. In the medieval period, the corporation was responsible for the upkeep of roads as far as the boundary of the liberty of the city. However, systematic construction of paved highways did not resume until the building of turnpikes in the 18th century. The system of turnpikes facilitated an increase in local and national coach traffic. A service between London and York had been established by 1658, and several local services were inaugurated during the 18th century. However, the greatest increase took place in the early 19th century, when the number of services rose from 14 in 1796 to 36 in 1823. From the 19th century onwards there has been significant development of the road system leading to the present highway hierarchy.

5.48 By the 10th century the Roman bridge across the Ouse had fallen out of use and had been replaced by a new bridge on the site of the current Ouse Bridge. This bridge and its successors was the only bridge over the River Ouse between York and the Humber Estuary until the Scarborough Railway Bridge was built in 1845, followed by Skeldergate, Lendal and, in the early 21st century, the Millennium Bridge. Beyond the historic city, river crossings were affected largely by ferry or ford. Ferries are evidenced by place names at Bishopthorpe and Naburn. There was a ferry on the site of Lendal Bridge, at the site of the Millennium Bridge and at Water End in Clifton. By the end of the 18th century there were three bridges across the River Foss at Foss Bridge, Layerthorpe and Monk Bridge.

5.49 In the 14th century citizens described the River Ouse as a 'highway' of trade coming from all parts of Yorkshire and further afield. By the 17th century efforts were being made to deal with navigation problems caused by silting between York and the Humber Estuary. It was not until the construction of the weir and lock at Naburn in 1757 that a concerted effort was made to ameliorate navigation of the Ouse. Regular passenger services on the river appear to have started in the early 19th century; a steam packet had begun to ply between Hull and York as early as April 1816 but the service had disappeared by 1876.

5.50 An Act 'for making and maintaining a navigable communication from the junction of the Foss and Ouse to Stillington Mill' was passed in 1793. By November 1794 the Foss Navigation had been opened up to Monk Bridge and by June of the following year the line had been marked as far as Sheriff Hutton. However, the navigation never delivered significant profits and the subsequent failure of the navigation was due to mismanagement and over-expenditure. However, the construction of and competition from the York and Scarborough railway ruined it. By 1845 it was silted up and stagnant and the corporation was anxious to take it over and cleanse it. An Act authorizing them to do so was obtained in 1853. The Foss retained a commercial function between Castle Mills Bridge and Foss Islands Road until the last delivery of newsprint by barge was made to the Evening Press plant in 1997.

5.51 York has been an important centre not only of railway routes but of railway administration from almost the very start of the Railway era. It was, in particular, the headquarters of the North Eastern Railway throughout the company's existence (1854-1923). York has attracted many ancillary railway activities, from carriage-building to the National Railway Museum. The city's first railway connection was constructed by the York and North Midland from York to Normanton, where it connected with lines to London and Leeds; it was built in three stages, the first opened in May 1839, the second in May 1840, and the third in July 1840. The opening of the Hull & Selby Company's line, also in 1840, extended rail communication from York to Hull. A temporary station in Queen Street was used until the Old Railway Station was built inside the city walls near Tanner Row in 1839. In 1877 the current railway station was constructed.

5.52 In 1936 an airfield was opened on land purchased in 1934 by the York Corporation in Clifton Without and Rawcliffe parishes. An air taxi service was operated but no scheduled passenger flights were made. The airfield was requisitioned in 1939 by the War Department. The site of Clifton Airfield has now been developed as an out-of-town business and retail park, residential and industrial properties. Remains of WWII airfields survive to varying degrees at Acaster Malbis (poor survival) Rufforth (good survival) and Elvington (good survival). Elvington is the location for the Elvington Air Museum.

Residential

5.53 The earliest evidence for housing comes in the form of post-holes and drip gullies representing Iron Age roundhouses from archaeological excavations on rural sites in the City of York. These houses were built from timber with wattle and daub walls and thatched roofs.

5.54 Evidence for housing in the Roman period comes from both urban and rural sites. Stone buildings appear for the first time, constructed from stone imported from the Tadcaster area and the North Yorkshire Moors. Mosaic floors, *hypocausts*, *opus signinum* floors, painted wall plaster, roof tiles, and masonry all demonstrate the sophistication of Roman domestic architecture in the city. No definite villa site has been identified within the City of York. However a range of structures have been excavated which represent buildings within rural farmsteads.

5.56 York has produced the best -preserved evidence for Viking period houses, storehouses and workshops in the UK. These were constructed of timber and wattle-and-daub construction. Houses often had cellars lined with plank-built walls with upright timber posts. Reed or straw thatch would be the usual roofing material.

5.57 Although part of a 12th century house built of stone survives at the rear of 48-50 Stonegate, the earliest, most complete surviving domestic building is the terrace of timber buildings in Goodramgate, Lady Row. Lady Row was built in 1316 and consists of nine one-up, one-down timber-framed tenements. Generally housing in the medieval city was

timber framed with either wattle and daub panels or tile panel infill. Buildings were of two three or four storeys, jettied, and roofed with either thatch, tiles or wooden shingles. Examples of such housing from the 14th to 17th centuries survive in the historic core in Stonegate, Petergate, Colliergate and the Shambles.

5.58 In the 18th century York witnessed a building boom at a time of a new architectural style. The adoption of brick allowed red-brick buildings to take the place of half-timbered houses and shops. New buildings such as the Mansion House, Fairfax House, Castlegate House, the Judge's Lodging, Mickelgate House, and 20 St Andrewgate represent some of the finest provincial 18th century housing in the country. Elsewhere in the city medieval timber-framed buildings were "modernised" through the addition of brick facades.

5.59 Interestingly, there are no medieval domestic buildings in the rural villages in the City of York. The earliest buildings all appear to date from the 18th century. The villages therefore form a stark contrast with the historic core: in the former there are earlier timber-framed structures and later brick buildings; in the latter there are only brick-built houses.

5.60 Archaeology is shedding more light on the development of 19th century working class housing. At Hungate five houses built in the mid 1800's fronting onto Lower Dundas Street were at some point subdivided into ten back-to-backs, each house then comprising a tiny one-up/one-down residence, in many ways not dissimilar to the 14th century housing at Lady Row. A five-cubicle toilet over a cess-pit was now rebuilt as a communal toilet block with a tipper-flush mechanism that in some parts of the city was in use up to the 1980s. Used by around 50 people it remained in use until the 1930s. Elsewhere within the City Walls only the terraced housing in Bishophill survives from this period. Outside the City Walls, 19th century housing can be traced along Lawrence Street and Heslington Road.

5.61 In 1901 Joseph Rowntree purchased 123 acres of land in Huntington, later known as New Earswick, and within three years had built 30 new houses, let at 5s. a week. The emerging garden village was a challenge to bad housing and bad building. With the exception of the Water Lanes clearance in 1852, little had been done to improve or clear the slums. It was not until the 1930's that significant slum clearance was carried out by the Corporation. Whole streets off Walmgate and in Hungate were pulled down, and the residents moved to new council homes built outside the city centre. By the mid-Thirties, the corporation housed one seventh of the city's population in more than 3,000 homes in estates like Tang Hall and Heworth Grange.

5.62 As York grew during the 20th century, outlying districts and villages were subsumed into the city. The village of Acomb had fewer than 1,000 residents in the 1871 census; that figure rose to 7,500 when it was officially incorporated into the city of York in 1937. Haxby grew from 711 in 1902 to 2,100 half a century later. Areas like South Bank sprang up, providing homes for workers at the Terry's factory. Whole streets in South Bank and off

Burton Stone Lane were constructed in a few years to cope with demand. The junction of Haxby Road, Wigginton Road and Lowther Street was wide open until terraces grew up around it in the first two decades of the century.

5.63 After WWII there was further expansion of public and private housing estates around the urban fringe and the villages. In 1967, Lord Esher, president of the Royal Institute of British Architects, produced a report *York: a study in conservation*. His report called for the city centre to be improved and repopulated, historic buildings to be enhanced and economically self-preserving, and only buildings of the highest standards to be built within the walled city. This led, inter alia, to the construction of new residential properties in the Aldwark area.

Leisure/Performance

5.64 There is no evidence for leisure activities or performance in the prehistoric period. In the Roman period, it is reasonable to assume that there would have been an amphitheatre and also, perhaps, a theatre in Eburacum. The recent excavation of a cemetery with burials that have been interpreted as the remains of gladiators reinforces this observation.

5.65 Archaeological finds of miniature objects dating to the Roman, Anglo-Saxon, Viking and medieval periods may suggest their use as toys or playthings.

5.66 Performance was undoubtedly a feature of the Roman town. However, it is not until the appearance of the Mystery Plays and their annual performance in the streets of the city at Corpus Christi that one can again talk of public performances. There is no record of when the Mystery Plays were first performed in the city. They are first recorded in York at the celebration of the festival of Corpus Christi in 1376, by which time the use of "pageant" wagons for performance in the streets had already been established. The wagons moved through the streets of York starting at Toft Green and finishing in St Helen's Square. The wagons stopped at each of 12 points or stations along the route and each play was performed in turn.

5.67 On the collapse of the mystery plays, increasing attention was devoted to the Midsummer Eve 'show', which began soon after dawn with a review of citizens in their armour, and proceeded later in the day with music and merry-making.

5.68 Medieval and later sports and pastimes included archery, cock-fighting, bear-baiting, and bull-baiting, while the popularity of dice, cards, and backgammon was in 1573 blamed for the scandalous neglect of archery. In 1566 two boys were flogged by the Ecclesiastical Commissioners for kicking a football in the minster itself.

5.69 The first recorded horse race at York took place between William Mallory and Oswald Wolstrope in 1530. In 1709 races were held on Clifton and Rawcliffe Ings. In the winter of 1730 the wardens of Micklegate Ward were ordered to drain Knavesmire, and next year the Knavesmire levelled and rolled; the meeting was first held there in the summer of 1731. In the middle of the century the amenities of the course were improved by Carr's grandstand and a new road leading to it. Further buildings were added in 1768.

5.70 The assemblies, though primarily a winter entertainment, were associated with race week, probably began about 1710 as weekly meetings in the King's Manor at which there were dancing and card games. The Assembly Rooms in Blake Street were built in time for the race week of 1732. The Assembly Rooms were built by subscription to a design by Lord Burlington. It was to be his masterpiece, an Egyptian Hall influenced by the work of Palladio and Vitruvius. For the next fifteen or twenty years, regular assemblies were probably held in the rooms, though they declined after 1750.

5.71 The riverside path and gardens known as New Walk were laid out as a promenade when the Assembly Rooms were being built.

5.72 In 1765 the Theatre Royal had been established on its present site. In 1825 a concert hall holding 2,000 people was constructed at the rear of the Assembly Rooms. Among the functions held in the concert rooms in the early 20th century were film shows: a cinematograph licence was granted from 1910 until 1915. In 1842 the De Grey Rooms were built, initially intended primarily to house the officers' mess of the Yorkshire Hussars during their annual visit to York. The rooms were also used for concerts, balls, public entertainments, and meetings.

5.73 At the beginning of the 20th century the Theatre Royal found a rival in the music hall: the 'York New Grand Opera House' was opened in 1902. In the early years of the century 'animated pictures' joined variety as a competitor of the Theatre Royal. Film shows were given in the Opera House, the Festival Concert Rooms, the Exhibition Buildings, the Victoria Hall (Goodramgate), the New Street Wesleyan Chapel, and in the Theatre Royal itself. The first building designed as a cinema, the Electric, Fossgate, was opened in 1911. Three further cinemas were established during the following ten years: the Picture House, Coney Street, The Grand, Clarence Street, and the St. George's Hall, Castlegate. Four new cinemas were opened in the 1930's: the Regent, Acomb, the Odeon, Blossom Street, the Regal, Piccadilly, and the Clifton. By the late 20th century all these apart from the Odeon had closed. Cinema was provided by a multiplex at Clifton Moor. In 2000 a new City Centre cinema, City Screen, was opened.

5.74 Sporting provision within the City of York can be traced through the emergence of cricket, football and rugby pitches managed by private and amateur clubs. Heworth Cricket Club is said to have been founded in 1784; in 2009 they celebrated their 225th anniversary. A cricket ground is shown on the 1852 OS Plan of the historic city at Leeman

Road. In 1864 a cricket ground was established by Wigginton Road where the Yorkshire Gentlemen. Yorkshire played their only first-class fixture in the City of York on this ground in 1890 when Yorkshire beat Kent. Yorkshire 2nd XI continued to use the venue until the late 1950s. In 1966 the site was developed for the district hospital.

5.75 The amateur clubs were often associated with the large employers – giving rise, for instance, to the Rowntree sports provision along Haxby Road and the York Railway Institute. This amateur provision was enhanced in the 20th century through the emergence of professional and semi-professional football, rugby league, and cricket clubs.

5.76 York City Football Club was founded in 1922 joining the Football League in 1929. It initially played at a pitch in Fulfordgate, moving to Bootham Crescent in 1932. York Football Club, the forerunner of York City Knights Rugby League Club, was formed in 1868. At first the club had no pitch of its own. The club played on the Knavesmire, at the Yorkshire Gentlemen's cricket ground in Wigginton Road (see above), eventually locating to a piece of land close to the Clarence Street, Wigginton Road, Haxby Road junction leased to the Club by the York Lunatic Asylum in 1885. In 1898 the club joined the new Northern Union. The club developed this site and eventually the site was sold for housing in 1989.

5.77 Rowing was a feature of the river Ouse in the 19th century. A regatta was held in October 1843, with the first official regatta in 1865 for "Racing and Swimming" with the course being from Marygate Landing to a boat moored below Ouse bridge which was rounded by the boats and. Swimming baths were municipally provided during the 1870's, notably at Yearsley Baths, St Georges Fields and the Museum Gardens. Bowling and cycling clubs began to increase in number during the 1890's.

Landscape and setting

5.78 Views in and out - York Minster sits on the subtle ridge formed by the York moraine surrounded by flat former wetlands. The surrounding low-lying, relatively flat landscape allows far reaching view of a classic cathedral landscape and a strong landscape setting and identity for York.

5.79 Rivers and Ings - The flooding of the Ouse and Derwent have played a major role on the landscape. The wetland meadows on the flood plains of the Ouse have been traditionally managed for centuries under a regime of grazing and hay cutting resulting in species-rich grassland. South Ings, Church Ings, Naburn marsh, and Fulford Ings all have SSSI status. Clifton Ings and Bishopthorpe Ings are linked to these and have been recognised as SINCS. The extensive quantity and connectivity between these wetlands makes them an especially significant national collection of wet grassland. The majority of these can be experienced from riverside footpaths leading out from the city centre. Within the town, strolling along the river is encouraged along the tree-lined promenades of New

Walk (created in 1730's), Terry Avenue, North Street Gardens and the esplanade in front of Museum gardens. The addition of the Millennium Bridge in 2000 has enhanced this tradition.

5.80 The full length of the Derwent along the City of York Council boundary is a SSSI, which expands to include the Derwent Ings in the far south east extent of the authority's boundary as a RAMSAR site of international importance. The Derwent Ings are more extensive because they are much less constrained by flood banks, thus allowing more extensive flooding. The Ings have been protected by their isolated location and through the maintenance of traditional farming practices over centuries associated with flood meadow grasslands, resulting in a rich wildlife habitat and internationally significant wetland both for habitat and birds. There are very few other examples of this extent and quality in the country.

5.81 Open countryside - Lowland heath is the most significant habitat in the York area. Strensall common is the most extensive, northerly lowland heath site in Britain. There are other lowland heath sites, but these are largely afforested with coniferous woodland in the south east area of the district, because the poor soil was less suited to agriculture, e.g. Wheldrake wood, Hagg wood. Ministry of Defence bought out the common rights of Strensall common circa 1840. It was probably used by military before this for practice purposes. Walmgate Stray was used during the first and second world wars. There is some evidence of use during the 18th century, e.g. mound for gun turret.

5.82 Heslington tilmire is more akin to the strays and indeed connects to Walmgate stray via the golf course. It is wet acidic grassland used predominantly as common grazing. The track alongside Heslington tilmire is the line of a Roman road. Old drove routes such as Outgang lane could pre-date Roman times. Broad funnel-shaped lanes. Most species-rich hedgerow alongside Roman road.

5.83 Askham Bog is the most significant example of valley fen in northern England. It is a unique meeting place for the wetland plants and animals from the south and east on one hand, and the north and west on the other, and is particularly renowned for its rare wetland plants and animals. Furthermore it has uniquely extensive historical records of its wildlife dating back to 18th century.

5.84 The landscape setting of some villages provides evidence of layers of different land management over the centuries. For example, Skelton's contemporary field system may contain elements of a Saxon or early Norman assarted landscape, evidenced in a more or less continuous oval of ditches divided, on old maps into North Field, South Field, Park Field and Ings field for grazing and hay, stemming from the old Norman manor site. This has been superimposed with reversed S-shaped hedgerows of medieval and early enclosure field patterns. The 19th century landscapes of Skelton Hall removed hedgerows in park field followed later by the planting of more recent hedgerows.

5.85 The high concentration of airfields within the York area provides large expanses of openness within an otherwise hedged landscape. Many of the runways are still present. Elvington now has an uncommon grassland habitat and birds because of its extensive open nature on poorer soils. Airfields such as Elvington provide a link in the green infrastructure as it connects Derwent vale to Heslington tillmire and in turn to the golf course on Heslington common and thence to Walmgate stry in very close proximity to the historic core.

5.86 Orchards, both commercial and private, were common place in and around York during the late 19th to mid 20th century. Many of the trees were incorporated into long rear gardens as the city grew in such areas as Holgate, Knapton Lane, and Tang Hall, the significance of which was written into the deeds of the properties. Some of these still stand today as veteran pear and apple trees. There are a few rare instances where the remains of neglected orchards have not been absorbed by later development, such as that which formerly belonged to York City Asylum (later Naburn Hospital). This is now managed as Fulford Community Orchard by the local communities. A new community orchard was created at Danesmead meadows in Fulford in the 1990's, and on Scarcroft Green in 2011.

5.87 Many of the district's public rights of way (PROW's) are now used purely for recreational purposes. But historically they had a number of purposes such as drove roads, Roman roads, and tow paths. Today they form important direct access to the countryside and cross-country links between neighbouring settlements; and long distance routes such as The Minster Way and the Ebor Way pass through the city centre. These beneficially devised long distance routes on existing public rights of way connect a variety of landscapes and make cultural/historical references. The Minster Way links the north's two probably most famous Minsters - Beverley and York. The Ebor Way (named after Eboracum) created in 1970 connects Helmsley with Ilkley and passes alongside the river Foss and Ouse and is led beyond the city's boundaries to the Wharfe along the line of a Roman road.

5.88 Designed suburban villages - The model village of New Earswick, contemporary with Saltaire and Port Sunlight, was founded by the York philanthropist Joseph Rowntree. Today it continues to provide a good example of the contribution that generous and thoughtfully laid out open space, private gardens, and landscape detail, especially grass verges, street trees and hedges, can make to the perceptions of well being through good design. The Foss, integral to the eastern side of the village, provides added amenity and recreational benefit, plus immediate access to the larger countryside. Similar principles were applied to much of Tang Hall which was designed and laid out by the City of York Corporation, where streets such as Fifth Avenue, Melrosegate, etc. were laid out with private gardens bound by hedges, wide grassed verges adorned with avenues of Lime trees; and included public parks alongside Tang Hall beck & Osbaldwick Beck, and provision of allotments.

5.89 Parks and gardens - York has a number of registered historic parks and gardens, but a number of others are noteworthy for a range of reasons, such as Homestead Park, Westbank Park, Hull Road Park and Glen gardens, York university, and also village greens and Millennium greens. All contribute to the matrix of culturally/recreationally evolved/evolving accessible open spaces that have a strong relationship with the built environment. Rowntree Park (registered in October 1999 grade II - of national significance) was York's first municipal park opened in 1921 based on a sketch plan attributed to Frederick Rowntree. The trees and shrubs for the park were supplied by the James Backhouse Nurseries in York. The basic format of the garden has remained unchanged, but there have been several alterations over the years, most recently this has resulted in a popular park that is suited to today's requirements of a municipal park. Terry Avenue, the former tow path along the river Ouse, forms its eastern boundary. To the south lies communal informal grass land providing a continuation of the open space and the avenue. The tree-lined Terry Avenue was added to the park in 1954 as a memorial to those killed during the Second World War. Homestead park is not of such importance in design terms, but it was also provided by Rowntrees and is located on the opposite side of town on the opposite bank of the river, thus balancing the distribution of parks by Rowntrees.

5.90 Museum gardens (registered Grade II May 1984) were laid out by Sir John Murray Naesmyth for the Yorkshire Philosophical Society in 1844, designed to provide private pleasure grounds for members of the society which formed an appropriate setting for the museum and the various ancient monuments and incorporated a botanical garden. The main circuit path remains substantially as shown on the 1847 plan, designed to offer changing views of the grounds, buildings and antiquities. In 1961 the Society gave the Museum and gardens in trust to the citizens of York. It contains a number of important specimen trees and the general tree cover provides setting for the many SAMs and listed structures within its grounds.

6: The Special Character and Significances of the City of York: Characteristics

6.1 Contemporary York is the latest manifestation of an internationally and regionally important city that dates back at least to the Roman occupation of Britain in the first century AD. It is easy to think of York in a historical sense as a series of overlapping past urban environments such as 'Roman York', 'Viking York' or 'Medieval York'. In fact, the modern city is all of this and more. The historic environment is the glue that brings it all together, not in a stale and overtly precious way but in a dynamic, exciting and very contemporary way. Partly through accident and partly through design, York, has uniquely retained much of the special character that sets it clearly apart from other similar historic cities in England. Since Lord Esher published his Conservation Plan for York's historic centre in 1968 there have been many subsequent studies, statements, plans and strategies which have researched and discussed the character and significance of York. Some have been protectionist, some have been progressive and it is clear that there can be no agreed single definitive statement about the special character and significances of the historic environment of York.

National Planning Policy Framework

6.2 The National Planning Policy Framework (NPPF), published in March 2012, sets out the Government's planning policies for England and how these are expected to be applied. It replaces the previous Planning Policy Guidance and Planning Policy Statements. The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. Sustainable development will involve seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life which can include moving from a net loss of bio-diversity to achieving net gains for nature and replacing poor design with better design. At the heart of the NPPF is a 'presumption in favour of sustainable development'.

6.3 With regard to local planning policies the NPPF states that policies should address the connections between people and places and the integration of new development into the natural, built and historic environment. They should be based on stated objectives for the future of the area and an understanding and evaluation of the area's defining characteristics. Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In developing this strategy, local planning authorities should take into account: the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring and the character of a place.

6.4 The NPPF includes policies about conserving and enhancing the historic environment. The objective of the policies is to maintain and manage change to heritage assets in a way that sustains and where appropriate, enhances its significance. That significance is the value of a heritage asset to this and future generation because of its heritage interest, which may be archaeological, architectural, artistic or historic. This significance may derive not only from its physical presence but also from its setting.

6.5 Great importance is attached to Green Belts in the NPPF. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Five purposes which the Green Belt serves comprise the following:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.6 For the natural environment the NPPF sets out that the planning system should protect and enhance valued landscapes, geological conservation interests and soils, recognise the wider benefits of ecosystem services and minimise impacts on biodiversity and providing net gains in biodiversity where possible.

The Evidence

6.7 Heritage assets in York are varied and complex. Ranging from the huge and impressive to the small and subtle, from highly visible surviving monuments and buildings to the buried remains of 2000 years urban development, human settlement and activity. The evidence is rich, unique and irreplaceable. The majority is hidden and relatively unknown either through burial or later building. Heritage assets and evidence can also be intangible, relating to aesthetics and interests which are hard to quantify and therefore difficult to manage and monitor. Presentation of evidence has traditionally dealt principally with the formally designated, or protected following national criteria and methodologies.

6.8 The following table presents evidence about assets that are currently recognised in one form or another through being included in statutory lists and schedules as well as inclusion in the City's Historic Environment Record. What it does not do is list evidence of all the undesignated historically valuable and architecturally interesting buildings, streets and urban landscapes because that data does not exist. The City of York does however have ambitions, in partnership with others, to establish a Local List of heritage assets (buildings, structures or spaces of archaeological architectural, historic or artistic significance) that will meet this.

Asset type	Designated	Undesignated
Listed buildings	1581	
Grade I	70	
Grade II*	170	
Grade II	1341	
Scheduled Ancient Monuments	22	
Conservation Areas	35	
Registered Parks and Gardens	4	
Areas of Archaeological Importance	1, divided into 7 polygons	
Historic Environment Record: monuments (including buried archaeology and upstanding buildings and ruins)		2272
Historic Environment Record: events (excavations, surveys and other research)		4296
Historic Environment Record: sources (books, journal articles, reports, personal communications)		1210
Vertical aerial surveys		4(1936, 1965, 1971, 1971-73)
Historic Landscape Characterisation data		various

Principal Characteristics

6.9 The following pages consider six principal defining characteristics of York's historic environment which have been arrived at following a period of detailed assessment and analysis. The six principal characteristics describe the fundamental special qualities of York that sets the City apart from other similar cities in England. There are gaps in our knowledge and understanding and this document recognises that further research will provide greater clarity.

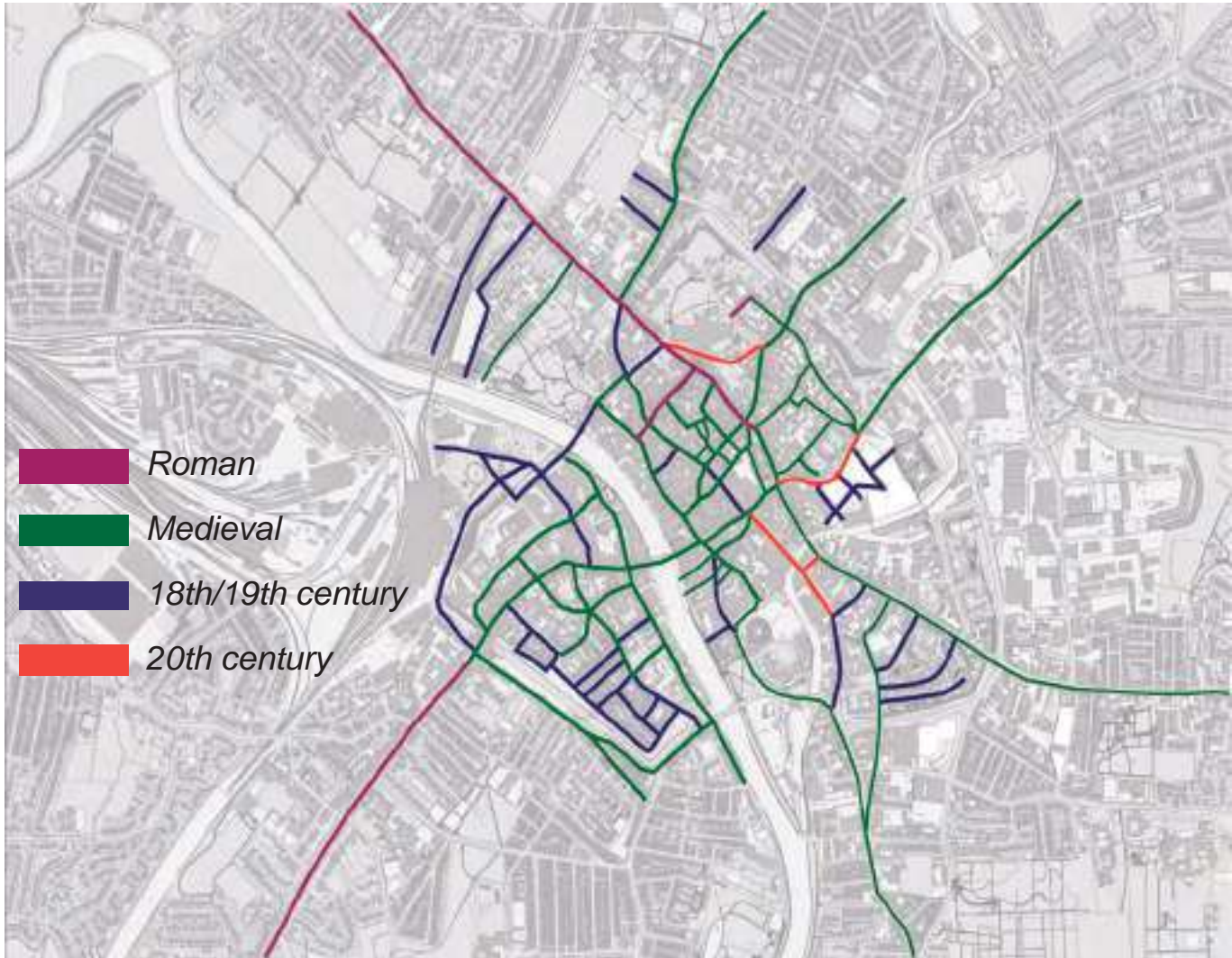
Strong Urban Form

6.10 There are few places in England where a 2000 year legacy of urbanism can be appreciated in such detail as in York. In many ways York offers a unique experience largely because it has remained relatively unscathed by the post-war urban renewal and reform programmes that have compromised so many other historic towns and cities. Post-war development, especially housing has instead added interest and value as at Walmgate in the historic centre and in many of the suburban areas of York. The medieval street pattern, in place by the 12th century, overlays of Roman roads, significant 19th century highway improvement schemes including St Leonard's Place, Parliament Street and the few later streets such as Clifford's Street and Piccadilly separate urban blocks of medieval tenements built on and rebuilt over many centuries. This is a remarkable survival and nowhere in competition with the dominance of the Minster which deliberately occupies the highest point in the centre.

6.11 The theme of these early urban blocks is taken up outside the historic core by the warehouses, factories, train stations, commercial, cultural and institutional buildings of the Victorian and Edwardian eras, built as a consequence of rapid urbanization, generally occupying whole blocks on the edge of the city centre where the scale of operation could take advantage of more open sites and close access to transportation routes.

6.12 The main arterial routes, many of Roman origin link countryside to historic core via suburban villages, linear developments and formal housing estates that continue the urban gain interspersed with major buildings and building complexes like Fulford Barracks, Bootham Hospital, Nestle and Terry's factories.

Map showing the most significant streets and roads by broad period in the historic core



Strong Urban Form			
Character Elements	Key Features	Examples	Significance
Large urban blocks	Mixed use blocks composed of taller (3-5 storey) buildings facing the street with lower extensions and <i>ad-hoc</i> smaller structures behind and within the blocks, retained private yards. Blocks strongly enclose streets.	Throughout the walled city but particularly evident at Stonegate/ Low Petergate/Church Street.	This is a defining characteristic and the historic urban core.
Long narrow plots and gated side passages	Usually reflecting medieval or earlier building plots with side access to former workshops and gardens	Stonegate and Coney Street	Highly flexible form capable of successive occupation and reuse. A rare opportunity to appreciate the complexities of a medieval city as so much survives

Strong Urban Form			
Character Elements	Key Features	Examples	Significance
Framed shop fronts	Variety of good quality “frames” around shop windows, providing visual support to building above whilst allowing interaction with the street. Usually associated with smaller retail premises	Stonegate, Goodramgate, Low and High Petergate contain many historic examples. The Shambles interesting but less authentic. Coney Street is an example of a street under pressure	The extensive survival of small specialist retail establishments is a significant contributor to the quality of the York experience. Architecturally there is a close fit between this use and the layout and fabric of many surviving historic buildings; so importantly this characteristic maintains the authenticity of historic form and additionally it supports the local economy

Strong Urban Form			
Character Elements	Key Features	Examples	Significance
medieval street patterns	Overlaid pattern of historic routes, narrow well enclosed primary streets, gentle curvilinear routes, secondary lanes & ginnels/alleys threading through the blocks or giving access to more private enclaves. High degree of choice, connectivity and permeability.	Networks both south and north of the river within the city walls: Micklegate, St Martin's Lane, Goodramgate, Coney Street, Coffee Yard, historic water lanes on north bank leading to river	The survival of such an extensive network of medieval streets and lanes is rare in an English city. The "pre-conquest" origin of so many streets in the historic core increases the significance of this asset.
Small squares	Close distribution of small squares intimate in scale. Larger spaces formed later by highways interventions or through provision of markets. Few examples of formal compositions such as at "Eye of York".	St Helen's Square (good quality natural materials), St Sampson's Square (early market place) & King's Square (triangular space created from former church yard) – both lined with trees. Added to in C20th with St Mary's Square off Coppergate and enhancement scheme in Parliament Street.	Rare survivals of early spaces where previous uses often determine the spatial form. Enduring quality of openness to be guarded.

Strong Urban Form			
Character Elements	Key Features	Examples	Significance
Rich townscape	city centre as a place of diversity, contrasts and surprises; unfolding views of great variety and historic interest; juxtaposition of different materials and forms; experience of shock scale; bridges offering panoramic views; pre-industrial skyline of city centre; city walls as vantage points, highly legible environment	Micklegate unfolding up the hill(Pevsner), view from Exhibition Square towards Bootham Bar and beyond, emergence from Minster Gates to south transept of Minster, from Lendal Bridge towards north bank of River Ouse, roofscape from Clifford's Tower	Highly attractive environment of human scale developed over two millennia. Vulnerable to loss through large scale interventions (highways and buildings)
Arterial roads	broad straight streets connecting city centre to suburbs enclosed by buildings of higher stature towards city bars; cobbled margins and tree lined avenues giving way to broad verges (at best); routes interrupted by large outlying complexes providing green open spaces	Blossom Street/The Mount/Tadcaster Road (main route into city from Great North Road, Bootham with later Georgian, Edwardian and Victorian residential developments and location of purpose built hospital by John Carr	Streets of high quality following historic routes, particular to York.

Compactness

6.13 The city is located to the north east of the trans-pennine conurbations. It is a series of contained settlements each with its own planned agricultural hinterland with historic city at the heart of the administrative area. There is close access to and strong identification with the countryside. In turn the natural environment and relatively flat topography dramatize the setting of each settlement as it rises from the plain.

6.14 The historic city has a contained concentric form of approx 10km (6miles) across and its relatively flat terrain makes it “walkable” and cycle friendly. The historic green strays and rivers feed into the historic city centre and divide the built form into identifiable segments.

6.15 The majority of village settlements are linear in form, situated to take advantage of ridge routes. This gives rise to gently curving streetscapes with glimpsed views out of an immediate surrounding countryside.

6.16 Where village and town coalesce, villages retain their separate identity in various ways: by having a separate focus such as the village green (Clifton), an intermediate area of openness (Fulford), through change of scale (Dringhouses) and/or through provision of some local facilities.

6.17 The historic city centre is inward focused. The combination of dense urban fabric and relatively flat topography prohibit most outward views from street level. The open swathes of the rivers and strays provide visual relief and enable connection with the wider context. Elevated locations provide panoramic vistas of the city’s roofscape. Most important vantage points are the Minster, Clifford’s Tower and the city walls which assume strategic importance in connecting the city with long distance views beyond.

6.18 York is a compact city of international reach. Overseas connections forged through governance and trade have been supplanted by international relations in research and education, and by world wide tourism.



View from the grounds of Millthorpe Secondary School, one of the rare areas of relatively high ground in York.



The thriving shopping centre of Bishopthorpe Road during an annual street party.

Compactness			
Character Elements	Key features	Examples	Significance
Contained concentric form	The city is walkable and the centre is accessible by cycle and foot with relative ease. The York outer ring road accentuates the city form and the walls enclose the historic core.	The whole city.	This creates strongly defined entry points or 'gateways' and separates out rural from urban in a way that links countryside and urban very positively. A very significant contributor to York's unique identity.
Flat terrain and views	Low lying setting and compactness of city creates both long views and surprise views both out of and in to the historic core.	View from Clifford's Tower; views from the City Walls; revealed views of the Minster and other key monuments; enclosed views within the urban centre – The Shambles, High and Low Petergate.	Prohibits outward views from street level, enhancing the importance of views from elevated positions providing panoramic views of City's roofscape.
Arterial roads	Broad straight streets connecting city centre to suburbs enclosed by buildings of higher stature towards city bars; cobbled margins and tree lined avenues giving way to broad verges (at best); routes interrupted by large outlying complexes providing green open spaces	Blossom Street/ Tadcaster Road (main route into city from Great North Road, Bootham with later Georgian, Edwardian and Victorian residential developments and location of purpose built hospital by John Carr	Streets of high quality following historic routes, particular to York.

Compactness			
Character Elements	Key features	Examples	Significance
Dense urban fabric	Inward focussed centre, mixed uses both horizontally and vertically in urban centre, identifiable sub-areas of particular form and use	Retail core with living above the shop (Shambles), housing districts (Southbank), commercial area close to station	Mixed use compact city retains inherent characteristics of the pre-industrial city. The dense multi-nucleated city is also be a model for sustaining the city in the future.
Identifiable compact districts	Outlying development is divided into segments by the rivers, strays and arterial roads; this containment of built form positively accentuates the identity of each area whilst allowing quick access to open areas, informal green spaces and the cycle routes and riverside walks leading out of the city	Southbank and Tadcaster Road (Knavesmire/ Racecourse), Bishopthorpe Road & Fulford Road (divided by river)	Defining characteristic of peripheral area; access routes of high amenity value
Urban villages retain identity	Village greens as focus or linear main streets with surviving back lanes. Clusters of facilities retained in village core	Clifton (village green), Fulford (linear main street with wide verges)	Clustered form provides community focus; origins as separately planned rural settlements

Compactness			
Character Elements	Key features	Examples	Significance
Planned rural villages	Enduring form of curving linear main street with burgage plots running to historic back lanes; broad planted verges common feature of main artery, later infilling and minor extensions often protect historic grain, openness, and views out to countryside	Wheldrake, Elvington (linear), Askham Richard with village green	Origin as early planned agricultural settlements often dating from the 12th century.

Landmark monuments

6.19 Buildings of high cultural significance or common value remain highly legible within the everyday fabric of built form. They concentrate visual attention and punctuate both streetscape and skyline. These 'Object Buildings' act as physical and temporal landmarks within the city and are set apart from the everyday working/living/commercial fabric of the city. They possess special qualities to distinguish themselves such as: generosity of space; size and scale; special materials or technologies; highly skilled craftsmanship; and/or they employ architectural devices and symbols to evoke authority.

6.20 The Minster is the City of York's "signature building" and a symbol of common identity, which presides over the built environment surrounding it, dominating the city's skyline. The castle dominated by Clifford's Tower and complemented by the formal complex of 18th classical buildings within its precinct is an architectural and urban composition with few rivals in Britain demonstrating the long-standing importance of York, first as a political centre and later as a social centre. The city walls almost circumscribe the historic urban nucleus. They are a linear edge-defining monument softened by planted grassed ramparts and punctuated with formal gateways and towers. Their earlier role of physical and legislative limitation has given way to recreational use and they now provide a city perambulation with elevated vantage points.

6.21 York is unique in England for the number of substantial communal buildings which survive intact or as ruins from the Middle Ages. Other monuments include the four 14th and 15th century guildhalls, set apart from the more homogeneous fabric of the city.



The Minster from the city wall with the converted 1840s railway station in the foreground

Landmark Monuments			
Character Elements	Key Features	Examples	Significance
Buildings of high cultural significance	Visually, aesthetically and historically interesting and sometimes associated with historical events and specific individuals.	The Minster; Clifford's Tower (12th century massacre of York Jews); The Eye of York complex (Luddites; Chartists).	The relative completeness of the city walls and the presence of so many principal monuments within their circuit such as the Minster, Castle, Guildhalls, and numerous churches is unique in England.
Physical and temporal landmarks	The Minster in particular can be viewed from the Wolds, Moors and Dales. The walls are ever present and a perambulation of them will reveal many of the City's monuments including Terry's and the Nestle Factory. Clifford's Tower is particularly associated with historical events. The Civil War is associated with the Bars. The Eye of York with Luddites.	The Minster; Clifford's Tower, Terry's Factory; Nestle Factory. Rowntree Wharf; Foss Islands chimney.	The revealed views, distant views and iconic views of the Minster and other monuments are extremely important and are a principal characteristic.

Landmark Monuments			
Character Elements	Key Features	Examples	Significance
Substantial numbers of medieval communal buildings	Buildings that reflect functional importance as civic centres, places of justice, work and religious activity	Minster Court; Gray's Court; St Leonard's Hospital; King's Manor; Merchant Adventurers Hall.	The Minster is the largest Gothic Cathedral north of the Alps and probably the most architecturally expressive.
Monument clustering	There is very little dispersion and most principal monuments are sited within the historic core and there is a degree of inter-visibility, especially from the City Walls.	Exhibition Square (Bootham Bar; Roman Wall; City Wall; Art Gallery; Kings Manor; St Mary's Abbey).	The proximity of principal monuments to each other helps legibility and accessibility making it easy to enjoy the historical and cultural significances of York.
Quantity of monuments	York has a higher than average number of listed buildings and other principal monuments.	Views from the City Walls.	This is a defining characteristic of York which has succeeded in conserving so much of its architectural and artistic legacy.

Landmark Monuments			
Character Elements	Key Features	Examples	Significance
Diversity of monuments	Diversity ranges from Substantial limestone structures like the Minster to Timber framed Barley Hall and Merchant Adventurers Hall and domestic buildings to brick built Railway headquarters and 19th and 20th century factories.	Brick – Fairfax House; Limestone – The Minster; Timber framing – Merchant Adventurers Hall.	This diversity adds richness and interest and sets it apart from Bath as an example where easy access to good quality local stone and formal 18th century town planning resulted in less diversity.
Churches locked into urban fabric	Provide pockets of green space within dense urban blocks and are a haven for wildlife.	Churches off Micklegate.	Substantially enriches the spatial quality and amenity of the city centre in particular and historically they are surviving markers for important city parishes.

Architectural character

6.23 A morning's stroll around the historic centre and suburbs will reveal the full range of architectural styles from the 14th century up to the present day that can be experienced and appreciated. Two story timber framed 14th century almshouses on Goodramgate; jettied later medieval buildings on Low Petergate and The Shambles contrast with the four and five story brick Georgian and Victorian buildings on Church Street and Colliergate. These predominantly single developments sit adjacent or close to more formal terraces such as St Leonard's Place, St Saviourgate and elsewhere.

6.24 Areas of planned housing occur at Bishophill and Aldwark in the historic centre and Southbank and New Earswick as examples outside the City walls. Late 20th century housing in Aldwark supplanted an area of declining and noxious industry and was grafted onto the earlier street pattern accommodating pre-existing houses and other important buildings.

6.25 Housing is mostly set out as linear grids forming primary and secondary streets outside the city walls. The more orderly are the Victorian and Edwardian sub-urban expansions from the city core, usually substantial houses of 3 main floors with attic and cellars. Post war housing in the suburbs, for instance, Dringhouses and Woodthorpe comprise a mix of semi-detached and terraces with wide streets and generous gardens.

6.26 This rich diversity of age and construction is accompanied by a wealth of detail in window and door openings; bay rhythms; chimneys and roofscape; brick, stone, timber; ranges; gables; ironwork; passageways; and rear yards and gardens.



City Screen to the left and the Early Music Centre above.

Architectural Character			
Character Elements	Key Features	Examples	Significance
Architectural legacy	Buildings representing two thousand years of architectural development in close proximity to each other.	14th century almshouses on Goodramgate; The Guildhall, Merchant Adventurers Hall, The North eastern Railway Headquarters, Yorkshire House.	Expression of York's history - its important religious and early political role; and its socio-economic and technological development within Britain and Europe
Variety	The fine grain of urban blocks accommodates a tremendous range of building types from all ages. Early timber framed ranges and gabled fronts sit amongst later 18th century and 19th century brick built development. Formal Georgian town houses occupy plots adjacent to more ordinary dwellings. Churches and churchyards punctuate almost continuous street lines. Large guildhalls sit in their own enclaves. Few streets have consistent themes, though streets have formed their own identity. High degree of articulation through bay windows, window reveals, chimneys, high brick walls, iron railings and decorative artefacts.	Early 14th century Lady Row Goodramgate, Micklegate House, St Leonard's Place	York's architectural Continuity and change have resulted in a rich townscape with formality and informality co-existing.

Architectural Character			
Character Elements	Key Features	Examples	Significance
Human scale	The limits of natural materials and techniques have ensured that human scale buildings predominate. Narrow plot boundaries assist in developing rhythm. Where these limits have been exceeded to create factories, warehouses, office blocks, they have simple massing and are clustered on low ground close to the station or within extra mural compounds. Even so height is restrained, roof-tops acknowledge with modelling or decorative parapets, and facades have a level of detailed consideration.	Majority of city centre and village buildings built as residences, shops, workshops. Former railway HQ building sets standard for station cluster. 1960s and 1980s insurance buildings sit reasonably well into the urban landscape	The absence of post-war high rise development has protected the visual dominance of the Minster and ensured the survival of ground level views as well as preserving York's unique skyline. The significance of this is also experiential for visitors and residents. Use of large scale with hierarchy of elements is usually reserved for important buildings

Architectural Character			
Character Elements	Key Features	Examples	Significance
Craftsmanship	Highly skilled craftsmen and artists have benefited from religious and secular patronage through-out York's history. Of particular significance are: stained glass, stone carving, carpentry and timber relief work, wrought and cast ironwork, monuments, brasses, bells and public statuary	Minster east window, Merchant Adventurer's aisled timber frame, Lutyen's war memorials	Highly significant artefacts in international and national context. Focus of research and apprenticeship training. Important to retain knowledge, skill base and workshops in city centre and local area.

Architectural Character			
Character Elements	Key Features	Examples	Significance
Materials	<p>Magnesian limestone used for early religious buildings and the few stone houses, with sandstone being sourced later for civic buildings. Historically materials were locally sourced and crafted, with timber framing succeeded by clamp bricks in lime mortar. Highly skilled master carpenters extended spans and the range of details in important buildings such as Guildhalls. Brickwork gave warmth, texture and solidity to many ordinary buildings whose solidity was punctured by regular openings of limited width. Subtle variety of detail exists within regular facades, though timber framing allowed more freedom. Heavy dentilled cornices and string courses of formal architectural buildings are common. Small element tile and pantiles common on older roofs were followed by slate brought in by the railways White/buff bricks belong to industrial period.</p>	<p>City churches (limestone), guildhalls (timber framing), 18th and 19th century houses (brickwork), 1870s railway station and hotel (buff brick)</p>	<p>Materials signify the importance of a building. They dictate rhythm, scale and proportion and are used to give emphasis through articulation and detail. Modern framed buildings in York have used natural materials and solid compositional discipline to avoid uncharacteristic transparency.</p>

Archaeological Complexity

6.27 Archaeological features and deposits are finite and fragile. Sub-surface deposits cannot be repaired or replaced. Whilst the fabric of above ground buildings and structures can be repaired or restored, this inevitably entails the loss of original material, the fragile and finite archaeology.

6.28 Archaeological deposits can be found throughout the City of York area. All areas within the City of York have the potential to preserve archaeological features and deposits. Detailed characterisation of the archaeological features and deposits within this area is a complex process beyond the scope of this paper. This section therefore attempts to provide simple, high-level character statements which can be used to assess the impact of Local Plan policy statements.



Foundations of the medieval church of All Saint's, Fishergate (photo by John Oxley).



Iron Age round house ditches at Campus 3, Heslington (photo by John Oxley).

Archaeological Complexity			
Character elements	Key features	Examples	Significance
Exceptional preservation in historic core	Timber foundations of Anglo-Scandinavian houses have been found well preserved at Coppergate and Hungate. Food waste and other similar organic waste is well preserved giving valuable insight into diet, health, economy that is lacking in more conventional archaeological deposits	Excavated examples include Coppergate and more recently, Hungate.	Very few major urban sites of this age and complexity in Northern Europe have this amount of well preserved archaeological deposits, especially for the earlier periods. York has an internationally significant resource.
Depth of deposits in historic core	Remains of successive development from Roman through to the present day.	Throughout the centre but best illustrated through the 1980's excavations of Coppergate, now ably presented by the Yorvik Centre	This is one of the main factors in York's bid to become a World Heritage Site.
2000 years of urban development	Archaeological deposits relating to at least Roman through to the present day,	The Hungate excavations revealed the remains of housing from the period of Sebohm Rowntree's ground breaking study of poverty and health. Coppergate provided exceptional insights into Anglo-Scandinavian York.	Very few North European cities have so much well preserved evidence of urban development over such a long period of time.

Archaeological Complexity			
Character elements	Key features	Examples	Significance
Finite and non-renewable resource	Anaerobic deposits that are extremely dependant on sustained ground conditions. Fluctuating water table creates pressures on the continued preservation of these deposits. Any form of deposit removal, even by archaeologists in a controlled and recorded manner will destroy important evidence and information.	Throughout the city.	Archaeological deposits and the remains of human settlement and activity provide a rare insight into the lives of our ancestors in a way that the limited number of contemporary documents cannot. Because the deposits are so rich and so well preserved in York, the information contained within them is both irreplaceable and internationally important, especially for the earlier periods.

Archaeological Complexity			
Character elements	Key features	Examples	Significance
Majority of Known and unknown archaeological features and deposits are not designated heritage assets.	The York Historic Environment Record contains some 6000 records relating to the archaeology of York and its surroundings which is only a small percentage of actual remains.	East Heslington excavations of prehistoric and Roman settlement.	Very difficult to predict where significant archaeology will be found and because the historic core is so special, its relationship with the rural hinterland is also very important. The low density of damaging development throughout the Unitary area has meant that more archaeology has survived.

Landscape and setting

6.29 On a national scale York's landscape is considered generally not to be of a particularly high quality. Nonetheless it does include a range of features of natural, historical, and cultural significance that contribute to the special qualities of the local landscape. This is also the landscape that serves a substantial population, thus placing great importance on the amenity that it affords. The landscape provides the city and its outlying villages with a rural setting and a direct access to the countryside, and thus has a value/status that reaches beyond the relative quality of the aesthetic landscape.

6.30 Its relevance lies in the conglomeration of layers and relics of old landscapes, in part conserved through time by continuous administration, absence of development, and centuries of traditional management. It is the combination of the various elements such as the lngs and strays that provides York's unique make up. The natural environment is significant in its concentrated collection of a variety of examples of historically managed landscapes, represented for example by wild flower meadows, lowland heath, valley fen, strip fields, veteran orchard trees, species-rich hedgerows. Many of these otherwise isolated remnant landscapes link up with other open spaces resulting for example from our industrial or war time past, to form often accessible tracts of subtly diverse landscapes; thus the landscape/natural heritage is much greater than the sum of its parts.



*The
Knavesmire,
part of
Micklegate
Stray and an
important part
of York's green
infrastructure.*

Landscape and Setting			
Character elements	Key Features	Examples	Significance
Views in and out	<p>Long-distance views of York Minster in low-lying relatively flat vale landscape. The Minster constantly reappears at closer quarters.</p> <p>View of the race course/ Knavesmire and Terrys combined.</p> <p>Rural edge setting viewed from majority of ring road by way of field margin (northern ring road business parks exception to rule).</p> <p>Views out to the Wolds, Moors and the Howardian Hills (orientation, identity, and sense of location/ setting).</p>	<p>Views from the A64 to Minster from stretch between Hopgrove roundabout to Hull Road</p> <p>View of Minster and city from Askham Bryan roundabout</p> <p>Closer views of Minster from Leeman Road and Water End.</p> <p>View of Terrys/race course/Knavesmire from A64/Bishopthorpe.</p> <p>Views out from Acomb, Kimberlow Hill/Grimston Bar.</p> <p>Views from the Ouse when approaching from the south;</p> <p>Views entering York by Rail from the North, as the line sweeps round by Water End bridge.</p>	<p>This is an important English cathedral landscape that goes to the heart of York's identity and attractiveness.</p> <p>There is a unique combination of elements of historic/ cultural significance important for the setting and identity of York.</p> <p>The proximity of hills/ countryside give a strong sense of place and location. The long distance views are rare - element of surprise and appreciation.</p>

Landscape and Setting			
Character elements	Key Features	Examples	Significance
Strays (including racecourse) and common land	Openness; greenness; natural/rural character within city. Village greens.	All the strays. Some connect with other open spaces which extend their capacity as part of the City's green infrastructure with linked spaces providing a continuous green route through a range of open spaces, e.g. Scarcroft recreation ground – Scarcroft allotments – Knavesmire – allotments - Hob Moor. Walmgate Stray/ allotments - university grounds, Heslington golf course.	More than any other similar city there is a strong countryside connection between the historic core and perimeter countryside. Variety between them; each serving a range of different functions; in part protected by historic management. Immediacy and availability/welcome, most are open access. Race course open space - cultural significance. Race days – sense of event across city.

Landscape and Setting			
Character elements	Key Features	Examples	Significance
Rivers and Ings	<p>Derwent/Ouse: Flooding; Ings meadows; retention of traditional management over centuries - still hay cropped and grazed where possible.</p> <p>Ouse - walking along most of either bank north to Beningborough hall, south past Bishops palace. Activity on river - rowing (3 clubs) dating back to mid 19th century.</p> <p>Foss – two rivers converging in city centre; walkway from centre to countryside beyond ring road; linking villages – the ‘hidden’ river.</p> <p>Views along river/banks.</p>	<p>Derwent Ings; Fulford Ings (north of the ring road); Naburn marsh (south of ring road); Church and South Ings at Acaster malbis; all SSSI’s; Millenium Walk, New Walk, Terrys Walk; avenues of trees.</p>	<p>The Derwent Ings are internationally important. SSSI’s of national importance. Their significance lies in the number and extent of SSSI’s within the local authority boundary.</p> <p>Setting of city and recreational value.</p>

Landscape and Setting			
Character elements	Key Features	Examples	Significance
Open countryside and green belt	The open countryside surrounding York contributes to the landscape setting of the historic city. A wide variety of different habitats and landscape elements including: Lowland heath; wet acidic grassland; rich hedgerows; valley fen; open Ings landscape associated with river; wildflower meadows; Airfields with large expanse of openness/cultural heritage/habitat value; Village settings including: assarted land; strip field pattern/ridge and furrow; hedgerows; veteran orchards. Long distance uninterrupted recreation routes with cultural significance through countryside Orchards – vale of York high orchard productivity historically; veteran Pear and apple trees often in gardens of later development.	Strensall Common; Askham bog; Heslington tilmire. Airfields: Elvington, Acaster Malbis, Rufforth, Clifton Moor, Copmanthorpe. Rufforth & Murton. Nether Poppleton; Skelton Hessay church yards. Ebor Way, Minster way – linking two Minsters. York to Selby disused railway line passing through open countryside connecting to other routes. Walmgate stray; Heslington golf course Derwent Ings. Scarcroft recreation ground – Scarcroft allotments – Knavesmire/Racecouse – splits to Hob Moor allotments – Hob Moor and Trans-Pennine trail cycle route. Orchard trees: in gardens at Skelton, Tanghall, Holgate. One fruit tree planted in every garden in first model of New Earswick.	Strensall common most extensive, northerly lowland heath site in Britain. Askham bog - most significant site in northern England and has uniquely extensive historical records of its wildlife dating back to 18th century. High concentration of airfields. Elvington - uncommon grassland habitat and birds because of extensive open nature. National route: spur of Trans-Pennine trail, runs coast to coast from Southport to Hornsea; cultural heritage along line of disused railway. Orchards at Skelton, Tanghall and Holgate remnant veteran Pear and apple trees usually in back gardens of later development. Significance written into deeds of properties. Historically significant.

Landscape and Setting			
Character elements	Key Features	Examples	Significance
Suburban villages	Street trees, public parks, large gardens, 'quiet streets', pedestrian-friendly environment, strong community identity, allotments, front gardens bound by hedges	New Earswick model village, Tanghall, Dringhouses	Design/movement examples; philanthropic; cultural significance; association with Rowntrees Complete compositions of key features and holistic community provision
Parks and gardens	Registered historic parks and gardens Parks for the people Designed campus landscape Matrix of accessible parks	Museum gardens; Rowntrees park; York cemetery. Others - Tower gardens, Homestead Park York university	Museum gardens: Exceptional concentrated collection of SAMs/ listed buildings in designed circulatory walk; botanical gardens Rowntrees park and Homestead park given to people of York by Rowntrees and son Seebolm: Cultural significance and major recreational facility for large population, landscape/trees/ setting. York cemetery: landscape setting, trees, bio-diversity, important people/ head stones; listed structures. Iconic campus landscape (originally)

Landscape and Setting			
Character elements	Key Features	Examples	Significance
Relationship of the historic city of York to the surrounding settlements	The relationship of York to its surrounding settlements. This relationship relates to not simply the distance between the settlements but also the size of the villages themselves, and the fact that they are free-standing, clearly definable settlements.	Skelton, Upper and Nether Poppleton, Bishopthorpe...etc	The relationship of York to its surrounding settlements was identified as one of the elements which contributes to the special character of the City. The relationship of York to these settlements could be damaged by with the growth of the city or, conversely, the expansion of the villages.

7: Conclusion

7.1 This document has considered evidence relating to the City of York's historic environment and how the evidence is translated into our understanding of the city's special qualities and its complex 2000 year history. This evidence and understanding has then been used to identify six principal characteristics of the historic environment that help define the special qualities of York, providing a detailed explanation of each characteristic.

7.2 The following six principal characteristics are identified as strategically important to the special character and setting of York:

- the city's **strong urban form**, townscape, layout of streets and squares, building plots, alleyways, arterial routes, and parks and gardens;
- the city's **compactness**;
- the city's **landmark monuments**, in particular the City Walls and Bars, the Minster, churches, guildhalls, Clifford's Tower, the main railway station and other structures associated, with the city's railway, chocolate manufacturing heritage;
- the city's **architectural character**, this rich diversity of age and construction displays variety and order and is accompanied by a wealth of detail in window and door openings; bay rhythms; chimneys and roofscape; brick; stone; timber; ranges; gables; ironwork; passageways; and rear yards and gardens;
- the city's **archaeological complexity**: the extensive and internationally important archaeological deposits beneath the city. Where development is permitted, the potential to utilise this resource for socio-economic and educational purposes for the benefit of both York's communities and those of the wider archaeological sector will be explored; and
- the city's **landscape and setting** within its rural hinterland and the open green strays and river corridors and lngs, which penetrate into the heart of the urban area, breaking up the city's built form.

7.3 These characteristics define the city and set it apart from other similar cities in England and should be key considerations for enhancement and growth. New development can have an adverse, neutral or positive impact on what makes the city special and it is important for development proposals to respond to York's special qualities, character and significance whether in the historic core, urban fringe or rural village communities. Although York is famous for its historic assets, new developments can add richness and diversity to its existing corpus of building styles and types and better reveal its significances through enhancement and research.

Prepared by: City of York Council Design, Conservation & Sustainable Development Service

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Appendix 5

Historic England GPA3: The Setting of Heritage Assets

(December 2017)



Historic England

The Setting of Heritage Assets

Historic Environment Good Practice Advice in
Planning Note 3 (Second Edition)



Summary

This document sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.

It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting. The suggested staged approach to taking decisions on setting can also be used to assess the contribution of views to the significance of heritage assets. The guidance has been written for local planning authorities and those proposing change to heritage assets.

It replaces *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 – 1st edition, 2015* and *Seeing the History in the View: A Method for assessing Heritage Significance within Views* (English Heritage, 2011).

It is one of three related Good Practice Advice (GPA) Notes, along with [*GPA1 The Historic Environment in Local Plans*](#) and [*GPA2 Managing Significance in Decision-Taking in the Historic Environment*](#).

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[HistoricEngland.org.uk/advice/planning/planning-system/](https://historicengland.org.uk/advice/planning/planning-system/)

Front cover: York Water Gate, Victoria Embankment Gardens, City Of Westminster, Greater London.
Built for the Duke of Buckingham in 1626 to provide access to the Thames. View from south east.

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Institute of Historic Building Conservation

National Trust

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Introduction

1 The purpose of this Historic England Good Practice Advice note is to provide information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the [National Planning Policy Framework \(NPPF\)](#) and the related guidance in the national [Planning Practice Guide \(PPG\)](#). It should be read in conjunction with Good Practice Advice notes 1 ([The Historic Environment in Local Plans](#)) and 2 ([Managing Significance in Decision-Taking in the Historic Environment](#)). This good practice advice acknowledges the primacy of the NPPF and PPG, supporting the implementation of national policy, but does not constitute a statement of Government policy itself, nor does it seek to prescribe a single methodology or particular data sources. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation, national policies and objectives. This guidance, *Good Practice Advice 3 – The Setting of Heritage Assets* (2nd edition, 2017) supersedes *Good Practice Advice 3 – The Setting of Heritage Assets* (1st edition, 2015) and *Seeing the History in the View: A Method for assessing Heritage Significance within Views* (English Heritage, 2011).

2 The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or invest need to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets. At the same time those taking decisions need enough information to understand the issues.

3 This note gives assistance concerning the assessment of the setting of heritage assets, given:

- the statutory obligation on decision-makers to have special regard to the desirability of preserving listed buildings and their settings, and
- the policy objectives in the NPPF and the PPG establishing the twin roles of setting (see boxes below): it can contribute to the significance of a heritage asset, and it can allow that significance to be appreciated. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the heritage asset's conservation, including sustaining significance ([NPPF, paragraph 132](#)).

4 This note therefore starts by giving general advice on understanding setting and how it may contribute to the significance of heritage assets, before adding advice on how views play a part in setting; it ends by suggesting a staged approach to taking decisions on the level of the contribution which setting and related views make to the significance of heritage assets (Part 2, paragraphs 17–42).

5 Consideration of the contribution of setting to the significance of heritage assets, and how it can enable that significance to be appreciated, will almost always include the consideration of views. The staged approach to taking decisions on setting given here can also be used to assess the contribution of a view, or views, to the significance of heritage assets and the ability to appreciate that significance.

6 Views, however, can of course be valued for reasons other than their contribution to heritage significance. They may, for example, be related to the appreciation of the wider landscape, where there may be little or no association with heritage assets. Landscape character and visual amenity are also related planning considerations. The assessment and management of views in

the planning process may therefore be partly or wholly separate from any consideration of the significance of heritage assets. This advice therefore directs readers elsewhere for approaches to landscape and visual impact assessment and amenity valuation (paragraphs 15 and 16).

Part 1: Settings and Views

NPPF Glossary: Setting of a heritage asset

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral ([NPPF, Annex 2: Glossary](#)).

PPG: What is the setting of a heritage asset and how should it be taken into account?

The “setting of a heritage asset” is defined in the Glossary of the National Planning Policy Framework.

A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.

The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in

which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.

When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation ([PPG, paragraph: 013, reference ID: 18a-013-20140306](#)).

Difference between setting and curtilage, character, context and landscape

7 Setting is separate from the concepts of curtilage, character and context:

- Curtilage is a legal term describing an area around a building and, for listed structures, the extent of curtilage is defined by consideration of ownership, both past and present, functional association and layout. The setting of a heritage asset will include, but generally be more extensive than, its curtilage (if it has one) (see [Identification and Designation of Heritage Assets: Listed Buildings](#) in the Historic England *Heritage Protection Guide*).
- The historic character of a place is the group of qualities derived from its past uses that make it distinctive. This may include: its associations with people, now and through time; its visual aspects; and the features, materials, and spaces associated with its history, including its original configuration and subsequent losses and changes. Character is a broad concept, often used in relation to entire historic areas and landscapes, to which heritage assets and their settings may contribute.
- The context of a heritage asset is a non-statutory term used to describe any relationship between it and other heritage assets, which is relevant to its significance, including cultural, intellectual, spatial or functional. Contextual relationships apply irrespective of distance, sometimes extending well beyond what might be considered an asset's setting, and can include the relationship of one heritage asset to another of the same period or function, or with the same designer or architect. A range of additional meanings is available for the term 'context', for example in relation to archaeological context and to the context of new developments, as well as customary usages. Setting may include associative relationships that are sometimes referred to as 'contextual'.

- To avoid uncertainty in discussion of setting, a landscape is 'an area, as perceived by people, the character of which is the result of the action and interaction of natural and/or human factors' (Glossary, *Guidelines for Landscape and Visual Impact Assessment*, 3rd edition, published by the Landscape Institute and the Institute of Environmental Management and Assessment, p 157, based on the definition in the European Landscape Convention, European Treaty Series – No. 176, Florence, 20.x.2000, p 2).

The extent of setting

8 The NPPF makes it clear that the extent of the setting of a heritage asset 'is not fixed and may change as the asset and its surroundings evolve' ([NPPF, Annex 2: Glossary](#)). All of the following matters may affect considerations of the extent of setting:

- While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time, and because new information on heritage assets may alter what might previously have been understood to comprise their setting and the values placed on that setting and therefore the significance of the heritage asset.
- Extensive heritage assets, such as historic parks and gardens, landscapes and townscapes, can include many heritage assets, historic associations between them and their nested and overlapping settings, as well as having a setting of their own. A conservation area is likely to include the settings of listed buildings and have its own setting, as will the hamlet, village or urban area in which it is situated (explicitly recognised in green belt designations).

The Courts have held that it is legitimate in appropriate circumstances to include within a conservation area the setting of buildings that form the heart of that area (R v Canterbury City Council ex parte David Halford, February 1992; CO/2794/1991). And NPPF paragraph 80, for example, makes it clear that historic towns are regarded as having a setting.

- Consideration of setting in urban areas, given the potential numbers and proximity of heritage assets, often overlaps with considerations both of townscape/urban design and of the character and appearance of conservation areas. Conflict between impacts on setting and other aspects of a proposal can be avoided or mitigated by working collaboratively and openly with interested parties at an early stage.

Setting and the significance of heritage assets

9 Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance. The following paragraphs examine some more general considerations relating to setting and significance.

The setting of World Heritage Sites may be protected as ‘buffer zones’ – see [PPG, paragraph: 033 Reference ID: 2a-033-20140306](#).

- **Change over time**
Settings of heritage assets change over time. Understanding this history of change will help to determine how further

development within the asset’s setting is likely to affect the contribution made by setting to the significance of the heritage asset. Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance but settings which have changed may also themselves enhance significance, for instance where townscape character has been shaped by cycles of change over the long term. Settings may also have suffered negative impact from inappropriate past developments and may be enhanced by the removal of the inappropriate structure(s).

- **Cumulative change**

Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building’s original designed landscape or the removal of structures impairing key views of it (see also paragraph 40 for screening of intrusive developments).

- **Access and setting**

Because the contribution of setting to significance does not depend on public rights or ability to access it, significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting, constraints on access such as remoteness or challenging terrain, and the importance of the setting to a local community who may be few in number. The potential for

appreciation of the asset's significance may increase once it is interpreted or mediated in some way, or if access to currently inaccessible land becomes possible.

■ **Buried assets and setting**

Heritage assets that comprise only buried remains may not be readily appreciated by a casual observer. They nonetheless retain a presence in the landscape and, like other heritage assets, may have a setting. These points apply equally, in some rare cases, to designated heritage assets such as scheduled monuments or Protected Wreck Sites that are periodically, partly or wholly submerged, eg in the intertidal zone on the foreshore.

- The location and setting of historic battles, otherwise with no visible traces, may include important strategic views, routes by which opposing forces approached each other and a topography and landscape features that played a part in the outcome.
- Buried archaeological remains may also be appreciated in historic street or boundary patterns, in relation to their surrounding topography or other heritage assets or through the long-term continuity in the use of the land that surrounds them. While the form of survival of an asset may influence the degree to which its setting contributes to significance and the weight placed on it, it does not necessarily follow that the contribution is nullified if the asset is obscured or not readily visible.

■ **Designed settings**

Many heritage assets have settings that have been designed to enhance their presence and visual interest or to create experiences of drama or surprise. In these special circumstances, these designed settings may be regarded as heritage assets in their own right, for instance the designed landscape around a country house. Furthermore they may, themselves, have a wider setting: a

park may form the immediate surroundings of a great house, while having its own setting that includes lines-of-sight to more distant heritage assets or natural features beyond the park boundary. Given that the designated area is often restricted to the 'core' elements, such as a formal park, it is important that the extended and remote elements of the design are included in the evaluation of the setting of a designed landscape. Reference is sometimes made to the 'immediate', 'wider' and 'extended' setting of heritage assets, but the terms should not be regarded as having any particular formal meaning. While many day-to-day cases will be concerned with development in the vicinity of an asset, development further afield may also affect significance, particularly where it is large-scale, prominent or intrusive. The setting of a historic park or garden, for instance, may include land beyond its boundary which adds to its significance but which need not be confined to land visible from the site, nor necessarily the same as the site's visual boundary. It can include:

- land which is not part of the park or garden but which is associated with it by being adjacent and visible from it
- land which is not part of the site but which is adjacent and associated with it because it makes an important contribution to the historic character of the site in some other way than by being visible from it, and
- land which is a detached part of the site and makes an important contribution to its historic character either by being visible from it or in some other way, perhaps by historical association

■ **Setting and urban design**

As mentioned above (paragraph 8, The extent of setting), the numbers and proximity of heritage assets in urban areas mean that the protection and enhancement of setting is intimately linked to townscape and urban

design considerations. These include the degree of conscious design or fortuitous beauty and the consequent visual harmony or congruity of development, and often relates to townscape attributes such as enclosure, definition of streets and spaces and spatial qualities as well as lighting, trees, and verges, or the treatments of boundaries or street surfaces.

See *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2* (2015) and *Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1* (2016).

- **Setting and economic viability**
Sustainable development under the NPPF can have important positive impacts on heritage assets and their settings, for example by bringing an abandoned building back into use or giving a heritage asset further life. However, the economic viability of a heritage asset can be reduced if the contribution made by its setting is diminished by badly designed or insensitively located development. For instance, a new road scheme affecting the setting of a heritage asset, while in some cases increasing the public's ability or inclination to visit and/or use it, thereby boosting its economic viability and enhancing the options for the marketing or adaptive re-use of a building, may in other cases have the opposite effect.

Views and setting

10 The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.

11 Views which contribute more to understanding the significance of a heritage asset include:

- those where the composition within the view was a fundamental aspect of the design or function of the heritage asset
- those where town- or village-scape reveals views with unplanned or unintended beauty
- those with historical associations, including viewing points and the topography of battlefields
- those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected
- those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant

12 Assets, whether contemporaneous or otherwise, which were intended to be seen from one another for aesthetic, functional, ceremonial or religious reasons include:

- military and defensive sites
- telegraphs or beacons
- prehistoric funerary and ceremonial sites
- historic parks and gardens with deliberate links to other designed landscapes and remote 'eye-catching' features or 'borrowed' landmarks beyond the park boundary

13 Views may be identified and protected by local planning policies and guidance for the part they play in shaping our appreciation and understanding of England's historic environment, whether in rural or urban areas and whether designed to be seen as a unity or

as the cumulative result of a long process of development. This does not mean that additional views or other elements or attributes of setting do not merit consideration. Such views include:

- views identified as part of the plan-making process, such as those identified in the *London View Management Framework* (LVMF, Mayor of London 2010) and *Oxford City Council's View Cones* (2005) and *Assessment of the Oxford View Cones* (2015 Report)
- views identified in character area appraisals or in management plans, for example of World Heritage Sites
- important designed views from, to and within historic parks and gardens that have been identified as part of the evidence base for development plans, and
- views that are identified by local planning authorities when assessing development proposals

Where complex issues involving views come into play in the assessment of such views – whether for the purposes of providing a baseline for plan-making or for development management – a formal views analysis may be merited.

Landscape Assessment and Amenity

14 Analysis of setting is different from landscape assessment. While landscapes include everything within them, the entirety of very extensive settings may not contribute equally to the significance of a heritage asset, if at all. Careful analysis is therefore required to assess whether one heritage asset at a considerable distance from another, though intervisible with it – a church spire, for instance – is a major component of the setting, rather than just an incidental element within the wider landscape.

15 Assessment and management of both setting and views are related to consideration of the wider landscape, which is outside the scope of this advice note. Additional advice on views is available in *Guidelines for Landscape and*

Being tall structures, church towers and spires are often widely visible across land- and townscapes but, where development does not impact on the significance of heritage assets visible in a wider setting or where not allowing significance to be appreciated, they are unlikely to be affected by small-scale development, unless that development competes with them, as tower blocks and wind turbines may. Even then, such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, for instance by impacting on a designed or associative view.

Visual Impact Assessment, 3rd edition, published by the Landscape Institute and the Institute of Environmental Management and Assessment (in partnership with Historic England).

16 Similarly, setting is different from general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting.

Part 2: Setting and Views – A Staged Approach to Proportionate Decision-Taking

17 All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies. Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it. This capacity may vary between designated assets of the same grade or of the same type or according to the nature of the change. It can also depend on the location of the asset: an elevated or overlooked location; a riverbank, coastal or island location; or a location within an extensive tract of flat land may increase the sensitivity of the setting (ie the capacity of

the setting to accommodate change without harm to the heritage asset's significance) or of views of the asset. This requires the implications of development affecting the setting of heritage assets to be considered on a case-by-case basis.

18 Conserving or enhancing heritage assets by taking their settings into account need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development. Many places coincide with the setting of a heritage asset and are subject to some degree of change over time. NPPF policies, together with the guidance on their implementation in the Planning Policy Guidance (PPG), provide the framework for the consideration of change affecting the setting of undesignated and designated heritage assets as part of the decision-taking process (NPPF, paragraphs 131-135 and 137).

19 Amongst the Government's planning policies for the historic environment is that conservation decisions are based on a proportionate assessment of the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset. Historic England recommends the following broad approach to assessment, undertaken as a series of

steps that apply proportionately to the complexity of the case, from straightforward to complex:

Step 1: Identify which heritage assets and their settings are affected

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

Step 5: Make and document the decision and monitor outcomes

Each of these steps is considered in more detail below.

For further information on Strategic Environmental Assessment and Environmental Impact Assessment, see *Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8* (2016).

Development proposals involving the setting of single and less significant assets and straightforward effects on setting may best be handled through a simple check-list approach and can usefully take the form of a short narrative statement for each assessment stage, supported by adequate plans and drawings, etc.

Cases involving more significant assets, multiple assets, or changes considered likely to have a major effect on significance will require a more detailed approach to analysis, often taking place within the framework of Environmental Impact Assessment procedures. Each of the stages may involve detailed assessment techniques and complex forms of

analysis such as viewshed analyses, sensitivity matrices and scoring systems. Whilst these may assist analysis to some degree, as setting and views are matters of qualitative and expert judgement, they cannot provide a systematic answer. Historic England recommends that, when submitted as part of a Design and Access Statement, Environmental Statement or evidence to a public Inquiry, technical analyses of this type should be seen primarily as material supporting a clearly expressed and non-technical narrative argument that sets out 'what matters and why' in terms of the heritage significance and setting of the assets affected, together with the effects of the development upon them.

Step 1: Identify which heritage assets and their settings are affected

20 The setting of a heritage asset is ‘the surroundings in which a heritage asset is experienced’ (NPPF, Annex 2: Glossary). Where that experience is capable of being affected by a proposed development (in any way) then the proposed development can be said to affect the setting of that asset. The starting point of the analysis is to identify those heritage assets likely to be affected by the development proposal.

21 It is important that, at the pre-application or scoping stage, the local authority, having due regard to the need for proportionality:

- indicates whether it considers a proposed development has the potential to affect the setting of (a) particular heritage asset(s), or
- specifies an ‘area of search’ around the proposed development within which it is reasonable to consider setting effects, or
- advises the applicant to consider approaches such as a ‘Zone of Visual Influence’ or ‘Zone of Theoretical Visibility’ in relation to the proposed development in order to better identify heritage assets and settings that may be affected

A ‘Zone of Visual Influence’ defines the areas from which a development may potentially be totally or partially visible by reference to surrounding topography. However, such analysis does not take into account any landscape artefacts such as trees, woodland, or buildings, and for this reason a ‘Zone of Theoretical Visibility’ which includes these factors is to be preferred.

22 For developments that are not likely to be prominent or intrusive, the assessment of effects on setting may often be limited to the immediate surroundings, while taking account

of the possibility that setting may change as a result of the removal of impermanent landscape or townscape features, such as hoardings or planting.

23 The area of assessment for a large or prominent development, such as a tall building in an urban environment or a wind turbine in the countryside or offshore, can often extend for a distance of several kilometres. In these circumstances, while a proposed development may affect the setting of numerous heritage assets, it may not impact on them all equally, as some will be more sensitive to change affecting their setting than others. Local planning authorities are encouraged to work with applicants in order to minimise the need for detailed analysis of very large numbers of heritage assets. They may give advice at the pre-application stage (or the scoping stage of an Environmental Statement) on those heritage assets, or categories of heritage asset, that they consider most sensitive as well as on the level of analysis they consider proportionate for different assets or types of asset.

24 Where spatially extensive assessments relating to large numbers of heritage assets are required, Historic England recommends that local planning authorities give consideration to the practicalities and reasonableness of requiring assessors to access privately owned land. In these circumstances, they should also address the extent to which assessors can reasonably be expected to gather and represent community interests and opinions on changes affecting settings.

25 Where the development proposal affects views which may be particularly helpful in allowing the significance of an asset to be appreciated and which are therefore part of the setting, it is often necessary to identify viewing points for assessment. An explanation why a particular viewing point has been selected will be needed. Sometimes a heritage asset is best appreciated while moving (for example, in a designed landscape, where its three-dimensional

formal qualities are an essential part of its significance). These, such as the changing views of the Tyne bridges viewed from the banks of the River Tyne or of the Tower of London from the south bank of the River Thames in London, are often termed 'kinetic' views.

Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

26 The second stage of any analysis is to assess whether the setting of an affected heritage asset makes a contribution to its significance and the extent and/or nature of that contribution; both setting, and views which form part of the way a setting is experienced, may be assessed additionally for the degree to which they allow significance to be appreciated. We recommend that this assessment should first address the key attributes of the heritage asset itself and then consider:

- the physical surroundings of the asset, including its relationship with other heritage assets
- the asset's intangible associations with its surroundings, and patterns of use
- the contribution made by noises, smells, etc to significance, and
- the way views allow the significance of the asset to be appreciated

27 The box below provides a (non-exhaustive) **checklist** of the potential attributes of a setting that it may be appropriate to consider in order to define its contribution to the asset's heritage values and significance. Only a limited selection of the attributes listed will be of particular relevance to an asset. A sound assessment process will identify these at an early stage, focus on them, and be as clear as possible what emphasis attaches to them. In doing so, it will generally be useful to consider, insofar as is possible, the way these attributes have contributed to the

A handy way of visualising the contribution of setting to the significance of heritage assets may be diagrammatically to map past and present relationships between a heritage asset and its surroundings, weighting the mapped connections to demonstrate the relative contribution of the relationship to the significance of the asset or the ability to appreciate the significance. By setting out the relationships and considering the level of their contribution to significance, it is possible to gauge impact more transparently and more consistently.

Change can also have the effect of strengthening relationships, for example by removing visual impediments such that significance is better revealed; mapping thereby provides one mechanism for identifying opportunities for enhancement.

significance of the asset in the past (particularly when it was first built, constructed or laid out), the implications of change over time, and their contribution in the present.

28 The local authority Historic Environment Record is an important source of information to support this assessment and, in most cases, will be able to provide information on the wider landscape context of the heritage asset as well as on the asset itself. Landscape Character Assessments, Historic Landscape Character Assessments, Conservation Area Appraisals, the Register of Parks and Gardens and the Parks & Gardens UK database are also important sources in this regard.

29 This assessment of the contribution to significance made by setting will provide the baseline for establishing the effects of a proposed development on significance, as set out in 'Step 3' below. It will, therefore, be focused on the need to support decision-taking in respect of the proposed development. A similar approach to

assessment may also inform the production of a strategic, management or conservation plan in advance of any specific development proposal, although the assessment of significance required for studies of this type will address the setting of the heritage asset ‘in the round’, rather than focusing on a particular development site.

30 An assessment of the contribution to significance of a view does not depend alone on the significance of the heritage assets in the view but on the way the view allows that significance to be appreciated. The view may be part of a

landscape, townscape or other design intended to allow a particular attribute of the asset to be enjoyed, such as its reflection in a body of water. Heritage assets (sometimes of different periods) may have been deliberately linked by the creation of views which were designed to have a particular effect, adding meanings through visual cross-references. Composite or fortuitous views which are the cumulative result of a long history of development, particularly in towns and cities, may become cherished and may be celebrated in artistic representations. The ability to experience

Assessment Step 2 Checklist

The starting point for this stage of the assessment is to consider the significance of the heritage asset itself and then establish the contribution made by its setting. The following is a (non-exhaustive) check-list of potential attributes of a setting that may help to elucidate its contribution to significance. It may be the case that only a limited selection of the attributes listed is likely to be particularly important in terms of any single asset.

The asset’s physical surroundings

- Topography
- Aspect
- Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains)
- Definition, scale and ‘grain’ of surrounding streetscape, landscape and spaces
- Formal design eg hierarchy, layout
- Orientation and aspect
- Historic materials and surfaces
- Green space, trees and vegetation
- Openness, enclosure and boundaries
- Functional relationships and communications
- History and degree of change over time

Experience of the asset

- Surrounding landscape or townscape character
- Views from, towards, through, across and including the asset
- Intentional intervisibility with other historic and natural features
- Visual dominance, prominence or role as focal point
- Noise, vibration and other nuisances
- Tranquillity, remoteness, ‘wildness’
- Busyness, bustle, movement and activity
- Scents and smells
- Diurnal changes
- Sense of enclosure, seclusion, intimacy or privacy
- Land use
- Accessibility, permeability and patterns of movement
- Degree of interpretation or promotion to the public
- Rarity of comparable survivals of setting
- Cultural associations
- Celebrated artistic representations
- Traditions

these same views today can illuminate the design principles and taste of our predecessors.

31 The impact of seasonal and day/night changes on a view or views needs to be considered, including other changes that may mean that a view at a particular point in time may not be representative of the experience over longer periods. Does summer foliage hide an asset that is visible in winter? Does artificial external lighting at night emphasise some aspects of an asset and leave others in the dark.

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it

32 The third stage of any analysis is to identify the effects a development may have on setting(s) and to evaluate the resultant degree of harm or benefit to the significance of the heritage asset(s). In some circumstances, this evaluation may need to extend to cumulative and complex impacts which may have as great an effect on heritage assets as large-scale development and which may not solely be visual.

33 The wide range of circumstances in which setting may be affected and the range of heritage assets that may be involved precludes a single approach for assessing effects. Different approaches will be required for different circumstances. In general, however, the assessment should address the attributes of the proposed development in terms of its:

- location and siting
- form and appearance
- wider effects
- permanence

34 The box (see [below](#)) provides a more detailed list of attributes of the development proposal that it may be appropriate to consider during the assessment process. This list is not intended to be exhaustive and not all attributes will apply to a particular development proposal.

Depending on the level of detail considered proportionate to the purpose of the assessment, it would normally be appropriate to make a selection from the list, identifying those particular attributes of the development requiring further consideration and considering what emphasis attaches to each. The key attributes chosen for consideration can be used as a simple check-list, supported by a short explanation, as part of a Design and Access Statement, or may provide the basis for a more complex assessment process that might sometimes draw on quantitative approaches to assist analysis.

35 In particular, it would be helpful for local planning authorities to consider at an early stage whether development affecting the setting of a heritage asset can be broadly categorised as having the potential to enhance or harm the significance of the asset through the principle of development alone; through the scale, prominence, proximity or placement of development; or through its detailed design. Determining whether the assessment will focus on spatial, landscape and views analysis, on the application of urban design considerations, or on a combination of these approaches will clarify for the applicant the breadth and balance of professional expertise required for its successful delivery.

36 Cumulative assessment is required under the EU Directive on EIA. Its purpose is to identify impacts that are the result of introducing the development into the view in combination with other existing and proposed developments. The combined impact may not simply be the sum of the impacts of individual developments; it may be more, or less.

Assessment Step 3 Checklist

The following is a (non-exhaustive) check-list of the potential attributes of a development affecting setting that may help to elucidate its implications for the significance of the heritage asset. It may be that only a limited selection of these is likely to be particularly important in terms of any particular development.

Location and siting of development

- Proximity to asset
- Position in relation to relevant topography and watercourses
- Position in relation to key views to, from and across
- Orientation
- Degree to which location will physically or visually isolate asset

Form and appearance of development

- Prominence, dominance, or conspicuousness
- Competition with or distraction from the asset
- Dimensions, scale and massing
- Proportions
- Visual permeability (extent to which it can be seen through), reflectivity
- Materials (texture, colour, reflectiveness, etc)
- Architectural and landscape style and/or design
- Introduction of movement or activity
- Diurnal or seasonal change

Wider effects of the development

- Change to built surroundings and spaces
- Change to skyline, silhouette
- Noise, odour, vibration, dust, etc
- Lighting effects and 'light spill'
- Change to general character (eg urbanising or industrialising)
- Changes to public access, use or amenity
- Changes to land use, land cover, tree cover
- Changes to communications/accessibility/permeability, including traffic, road junctions and car-parking, etc
- Changes to ownership arrangements (fragmentation/permitted development/etc)
- Economic viability

Permanence of the development

- Anticipated lifetime/temporariness
- Recurrence
- Reversibility

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

37 Maximum advantage can be secured if any effects on the significance of a heritage asset arising from development likely to affect its setting are considered from the project's inception. Early assessment of setting may provide a basis for agreeing the scope and form of development, reducing the potential for disagreement and challenge later in the process.

38 Enhancement (see [NPPF, paragraph 137](#)) may be achieved by actions including:

- removing or re-modelling an intrusive building or feature
- replacement of a detrimental feature by a new and more harmonious one
- restoring or revealing a lost historic feature or view
- introducing a wholly new feature that adds to the public appreciation of the asset
- introducing new views (including glimpses or better framed views) that add to the public experience of the asset, or
- improving public access to, or interpretation of, the asset including its setting

39 Options for reducing the harm arising from development may include the repositioning of a development or its elements, changes to its design, the creation of effective long-term visual or acoustic screening, or management measures secured by planning conditions or legal agreements. For some developments affecting setting, the design of a development may not be capable of sufficient adjustment to avoid or significantly reduce the harm, for example where impacts are caused by fundamental issues such as the proximity, location, scale, prominence or noisiness of a development. In other cases, good design may reduce or remove the harm, or provide enhancement. Here the design quality may be

an important consideration in determining the balance of harm and benefit.

40 Where attributes of a development affecting setting may cause some harm to significance and cannot be adjusted, screening may have a part to play in reducing harm. As screening can only mitigate negative impacts, rather than removing impacts or providing enhancement, it ought never to be regarded as a substitute for well-designed developments within the setting of heritage assets. Screening may have as intrusive an effect on the setting as the development it seeks to mitigate, so where it is necessary, it too merits careful design. This should take account of local landscape character and seasonal and diurnal effects, such as changes to foliage and lighting. The permanence or longevity of screening in relation to the effect on the setting also requires consideration. Ephemeral features, such as hoardings, may be removed or changed during the duration of the development, as may woodland or hedgerows, unless they enjoy statutory protection. Management measures secured by legal agreements may be helpful in securing the long-term effect of screening.

Step 5: Make and document the decision and monitor outcomes

41 It is good practice to document each stage of the decision-making process in a non-technical and proportionate way, accessible to non-specialists. This should set out clearly how the setting of each heritage asset affected contributes to its significance or to the appreciation of its significance, as well as what the anticipated effect of the development will be, including of any mitigation proposals. Despite the wide range of possible variables, normally this analysis should focus on a limited number of key attributes of the asset, its setting and the proposed development, in order to avoid undue complexity. Such assessment work is a potentially valuable resource and should be logged in the local Historic Environment Record.

42 The true effect of a development on setting may be difficult to establish from plans, drawings and visualisations. It may be helpful to review the success of a scheme and to identify any ‘lessons learned’ once a development affecting setting has been implemented that was intended to enhance, or was considered unlikely to detract from, the significance of a heritage asset. This will be particularly useful where similar developments are anticipated in the future.

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Appendix 6

Buildings of England ('Pevsner') Extract from University of York, from York and the East Riding

The chancel was restored 1885-6 by *Nixon Christian*, following an earlier survey by *J. F. Pearson*, and further restoration work was carried out by *W. H. Brierley* in 1893.

FONT. Tub-shaped, c. 1200; with arcading. - PULPIT. With the typical Jacobean blank arches. The date 1717 makes it incredibly old-fashioned. - The church has one of the finest collections of WOODWORK in the East Riding. Parclose screens of one-light divisions. - The cresting of another screen in N aisle. Could it be C16? - Four panels of c. 1520-30 with monsters, probably from pew ends, now in the tower. - STALLS with poppyheads. - One MISERICORD, quite probably the earliest in England, belongs to the SW stall. It has a trail of stiff-leaf type and must be c. 1200. - BENCH ENDS. By far the most complete set in the Riding. Mostly tracery patterns, but also the large figure of a jester in profile. - SCULPTURE In the transept a row of four excellent head corbels. They may well be *in situ* and have carried images above an altar. - STONE TABLE in the N transept. Two-bay front with two-light traceried panels and a crested top. C15, and related to the similar table at Pocklington (q.v.). - STAINED GLASS. E window s aisle †1900 N aisle windows 1925 and 1938 by *Douald R. Jamieson* (of *John Hardman & Co. Ltd*, Birmingham). - MONUMENTS. Several C12 gravestones, the best preserved under the crossing, with a cross head enclosed in a circle and a sword. - Cadaver, C15 or early C16 in N transept. - In the N aisle two wooden panels on which are painted curious rhyming inscriptions to Gregory (the 10th) Robinson †1696 and Gregory Robinson: †1758. - A number of wall-tablets including three by *Howe* of York †1785 †1800 and †1823. - William Huddlesley †1824 by *John Fearn* of Hull. Inscription on drapery in late C17 style with *Regency* urn. - J.P. Carr †1862 by *Laykorn* of Wakefield. Gothic. BAPTISM. Early example, for *Dame Lenox Pilkington*, †1706. Above are a funeral helm and gauntlets

In the village are a number of good C18 brick and pantile farmhouses, especially along the main street. CHURCH FARM, mid C18, of five bays, two storeys, with overhanging eaves, brick band, stone coping and kneelers to gables; LYTHE FARM late C18; HOBON HOUSE, dated 1751 on stone kneeler to right gable, two-storey, double-pile with a listish example of a central lobby-entry plan. THE HOUSES with date 1762 in keystone over blocked Venetian window over round-arched entrance door; and the OLD HALL, c. 1800, which has a somewhat showy facade for a house of its size. The central bay, slightly set back, has a pedimented top with semicircular recess. This shape is echoed in the Diocletian windows in the bays on either side. Central pedimented doorcases set in round-arched recess. Bands, modillion eaves cornice and brick quoins add to the effect. MILLHART HOUSE, at the S end of the village, has metal tie-plates forming the date 1754. An early example of a two-storey end-stack farmhouse

2. along SCHOOL ROAD a series of interesting mid-C19 buildings. First the former *SCHOOL*, now village hall, dated 1847. A delightful single-storey building of brick in Flemish bond with an overhanging hipped slate roof. Large round-headed windows with stone arches and wooden Y-tracery. The inscription over the larger central window records the building as a gift from Mary

file NH+L 2005.

Carr to her native parish. The building would not have disgraced her husband's great-uncle and benefactor, the architect John Carr. Opposite is THE CHASE, a pleasing mid-C19 three-bay brick house with hipped slate roof and Doric porch. Further E HEMINGBROUGH HALL, 1842, by *Weightman & Hadfield* for Rev. John Ion, vicar of Hemingbrough. Large many-gabled Tudor-style house. Main block of three bays with two-bay service wing. Rendered brick and slate with stone details. Mullioned windows and quoins. Opposite is THE HERMITAGE, the former vicarage of 1862 by *J. B. & W. Atkinson*.

CHAPEL FIELDS, E of the Hall. A group of four, once-identical, semi-detached cottages and two detached houses. A planned development of c. 1845 on newly enclosed land.

BARTHORPE LODGE on Howden Road, c. 1840. A square cottage with overhanging eaves and Gothic windows.

HAGTHORPE HALL, 2 m. E. Moated site with five-bay brick and pantile house of c. 1750 with later bay added to E. Good series of contemporary outbuildings. Opposite is BRACKENHOLME, a large ornate house of the 1890s in white brick with red brick pilasters and other details in red brick and stone.

WOOD HALL, 2 m. NE. A white brick mansion which has lain largely derelict since occupation by troops in the Second World War. The lesser W half, in pink brick, would appear to be the house erected by John Reeves in 1802. To this Robert Menzies added c. 1835 the main white brick block to the E. The doors and windows have stone architraves and there is a bold stone cornice with low-pitched slate roof. The three-bay N front has a Doric stone doorcase with open pediment, probably from the 1802 house, set in a two-storey canted bay to E. To the l. of this is a large Venetian staircase window recessed within a round arch. Three-bay E front with full-height bay window on l. The interior retains some fittings including the main staircase of stone with cast-iron balustrade.

HESLINGTON

ST PAUL. 1857-8 by *J. B. & W. Atkinson* replacing a medieval church on the same site. It is in the early C14 style and stands on its own. Nave, chancel and W tower with broach spire. Built at the expense of G.J. and Alicia Lloyd (later Yarburgh) of Heslington Hall and, when viewed from the S, it is a typical estate church. But the N elevation and the interior are a surprise, for the building was transformed in 1971-3 when a large and successful extension was added to the designs of *R. G. Sims*. The N wall of the nave was removed and a new N sanctuary was formed. To the N a series of linked octagons providing a vestry, library and meeting rooms were added. A slatted roof unifies the old nave and new sanctuary which is furnished with limed oak and black steel. - FONT. A striking piece in stainless steel, 1973. - The chancel has been left unaltered and retains its mosaic floor and REREDOS of 1870. - STAINED GLASS. E window c. 1858 by *William & Thomas Hodgson* of York. - Nave S window incorporates part of the 1919 window by *Kayll & Reed*, Leeds. - In the

large churchyard is a table-tomb on six stout vase-shaped legs. †1825.

Opposite the church in SCHOOL LANE is the simple one-storey brick and pantile OLD SCHOOL of 1795 with a central stack. Across the lane is its impressive Gothic gabled successor of 1856 by J. B. & W. Atkinson for G.J. and Alicia Lloyd. Red brick and slate with stone mullioned windows, tall stacks and a bell-turret with small spire. Additions by W. H. Brierley, 1908.

Despite, or perhaps more correctly because of, the presence of the University Heslington has retained its village character. The broad MAIN STREET has wide grass verges, trees and plenty of pleasant houses and cottages. The few new buildings, including two sympathetically designed banks, do not intrude. MANOR HOUSE at the S end is of the late C18, brick and pantile with stone coping and kneelers, four bays, two storeys. Entrance porch with fluted pillars. Opposite are the LADY DERAMORE MEMORIAL COTTAGES, four almshouses of 1903, of small brick and pantile in a pleasing late C17 style with central pediment and heavy moulded eaves cornice, justifiably attributed to W. H. Brierley. LIME TREE FARM is another four-bay late C18 farmhouse. Behind the village shop is the former WESLEYAN CHAPEL of 1844 with overhanging slate roof and Tudor windows and glazing bars. LITTLE HALL, set back from the street, is an ambitious double-pile house of the early C18 built for a member of the Yarburgh family. It is of five bays, brick with a flat-tile roof and stone coping to parapet and gables. The doorway has a broken pediment on brackets. Inside is a charming staircase with three twisted balusters to the step and a plaster ceiling with rectangular panels and the date 1734. VILLAGE FARM has a three-bay brick front of c.1700 with stringcourse and toothed eaves cornice. Lobby-entry plan with later outshot. It retains remnants of late C16 timber framing, with a post, rail and braces curving up to the wall-plate in typical Vale of York style. Nos. 9-10 MAIN STREET, mid C18, brick and pantile, with stringcourse. Originally one house of lobby-entry plan. No. 5 MAIN STREET is early C15. Lobby-entry, L-shaped plan, three bay, brick with pantile roof hipped to the left.

On Heslington Lane, which goes W between the Hall and its former stable block, is MORN HOUSE, of the mid to late C18, brick and slate, with two three-storey canted bays. Opposite THE LODGE, 'newly erected' in 1839, has a distinctive bowed front and a cast-iron balcony to first-floor window. Further out are the HESKETH ALMSHOUSES, founded by Sir Thomas Hesketh, 1605, and rebuilt by Henry Yarburgh in 1795. Brick and flat tile. Five doors, centre with three-bay pediment. Originally there was a chapel in the centre with four two-roomed apartments on either side.

UNIVERSITY OF YORK

The university was established in 1960. The initial designs by Robert Matthews, *Joiner-Morshall & Partners* (Andrew Derbyshire in charge) were accepted in 1962 and the first two colleges were opened in

1965. The concept of the general planning was that the university should be collegiate in the sense that staff and students, residential rooms, dining room, common rooms, a small library, and accommodation for academic departments (except those laboratory-based) should be repeated for each college. There are at the time of writing seven colleges with a student population of c. 5,000, of whom c. 1,000 are graduates (1992-3).

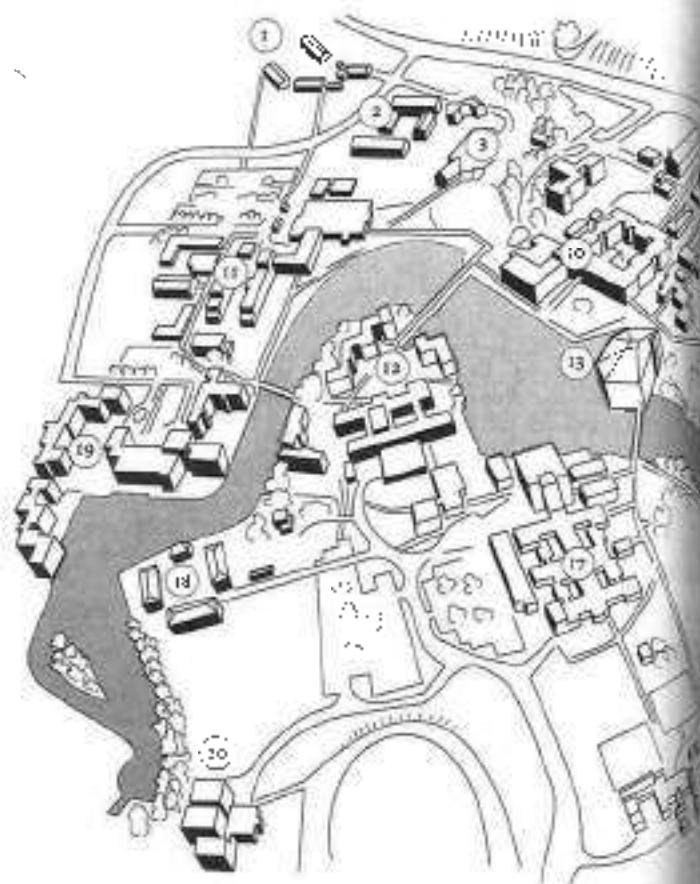
The site is just under two miles from the Minster and served by two main roads, University Road and Heslington Lane, the former simply bridged by the university buildings. The two roads meet at Heslington Hall.

HESLINGTON HALL, the administrative centre, is a large brick mansion with an open courtyard, now externally almost entirely a Victorian recasting of 1852-5 by P. C. Hardwick for Yarburgh Greame with alterations in 1876 by David Brandon and 1903 by W. H. Brierley. In its main facade it represents the old building which dated from 1565-8 and was erected by Sir Thomas Pym, secretary to the Council of the North (1550-78). The front is symmetrical with a stone doorway of two pairs of Corinthian columns and a pediment. This is a copy; the original is at the far end of the walled garden. The windows are mullioned and transomed and there are two canted bay windows reaching through two storeys, with four transoms. Three gables above. All this follows the old house closely, and since it incorporates much of the old structure may properly be called a restoration. The long projecting wings are largely Victorian, though there is old work in the basement and the high gables flanking the main front represent original features. The centre of the garden (SW) front is wholly a Victorian creation but the two flanking staircase towers belong to the original house.

The interior is mostly of 1903 by Brierley, but the great hall, now enlarged, placed in the traditional position and going up through both floors, has an original Elizabethan stucco ceiling with patterns of ribs and many pendants (very similar to that of Gilling Castle, North Riding). The wooden panelling at the N end is original too. The staircase installed when the hall was converted for University use in the early 1960s is entirely modern and suits the building excellently. Sir Bernard Feilcke was the architect for the conversion.

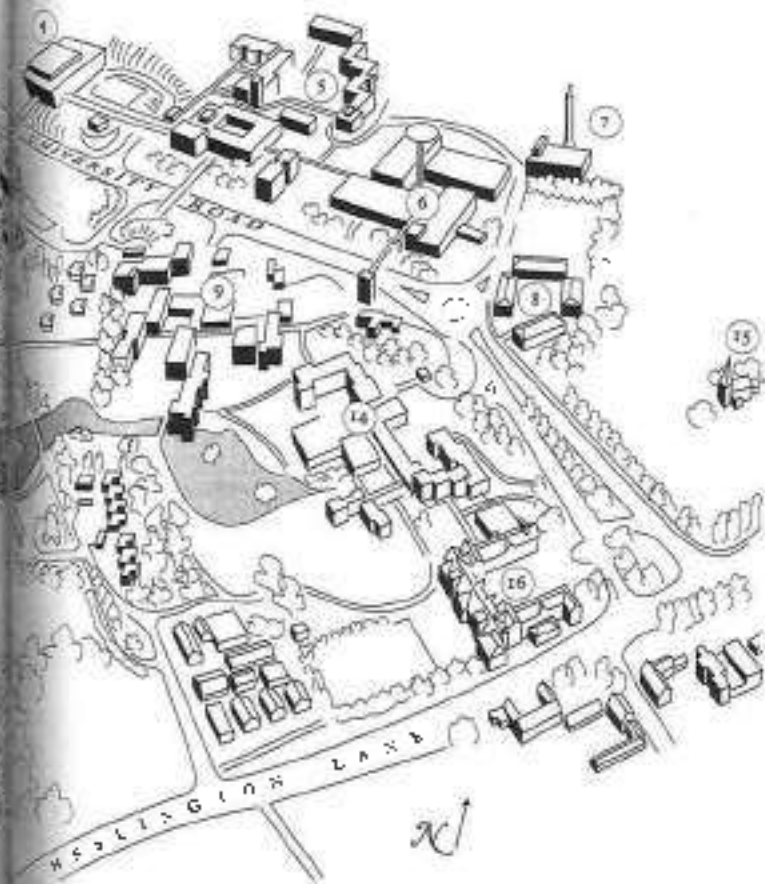
In the garden on the SW side is a metal sculpture, *Dryad*, by Austin Wright. Behind are ancient clipped yews providing a fine display of mature topiary work. They were part of the modest GARDEN in the Dutch style laid out in the late C17-early C18 for James Yarburgh, the father-in-law of Sir John Vanbrugh. At right angles was a formal canal extending into the parkland. The position of the canal is marked by an indentation in the lawn to the NW and overlooking this is a charming early C18 brick GAZEBO. The gazebo forms the corner of a walled garden in whose middle is a simple five-bay brick ORANGERY.⁴ AS for the NEW BUILDINGS and their siting, they have resulted in

⁴The following section on the University buildings is as written by Nikolaus Pevsner for the first edition published 1972, updated with notes on major additional buildings.



- | | | | |
|---|-----------------------------|----|----------------------------|
| 1 | Keechfield | 6 | Chemistry |
| 2 | Teis | 7 | Central Boiler House |
| 3 | Sir Jack Lomas Concert Hall | 8 | Derwent Langwith Extension |
| 4 | Boxer Merrell Library | 9 | Langwith College |
| 5 | Akwin College | 10 | Vanbough College |

the best of the new universities visually and structurally, thinks in one stroke of genius and one highly sensible decision. The stroke of genius is the large lake. It provides all the undulation and some of the variety one wants to see, and it allows the buildings to be entirely reasonable and to keep away from all gimmicks. The decision referred to was to use the CLASP system, a system of modular dimensioning and prefabricated parts. The



- | | | | |
|----|-------------------|----|-------------------------|
| 11 | Biology | 15 | Heslington Hall |
| 12 | Goodricke College | 16 | Physics and Electronics |
| 13 | Central Hall | 17 | Jellicoe College |
| 14 | Derwent College | 18 | Wentworth College |
| 15 | St Paul's Church | 19 | Sports Centre |

The University of York

module will be noticed everywhere, units of one, two, three panel widths for the windows, even for oriels projecting rectangularly and even for the many restless and incomprehensible concrete reliefs. The CLASP system allowed York to build more quickly and more cheaply than the others, which was and is imperative. Now all this may sound like boredom; in fact it is nothing of the sort. The first two colleges, DERWENT and LANGWITH, both

1965, are so intricately planned, with inner courtyards - even a square pond off the lake - many walkways, and projections this way and that, that one hardly comes to feel the chief reason behind it all.

The CHEMISTRY LABORATORIES, 1965, were among the first buildings too, across University Road. They are one-storeyed, four blocks with the splendid WATER TOWER in the middle. The shape of its tank, like an umbrella upturned by a storm, is the best venereal feature. The high triple chimney of the BOILER HOUSE is less of an ornament. To the E is the DERWENT and LANGWATH EXTENSION, late 1980s by *Hunt Thompson Associates*, the first major break from the original concept. Four accommodation blocks of yellow brick in a more traditional style arranged around a courtyard. The third college, ALCUIN, 1967, lies W of the laboratories. Its plan has less intricacy and hence less attraction. A courtyard is formed by the additional accommodation block to the N built 1990-1 by *Hunt Thompson Associates*. A terrace of three-storey brick houses with tiled roof with gables. Further W is the BOWEN MORRELL LIBRARY, 1966, and for this the CLASP system was replaced by precast concrete. A recessed ground floor, two floors of concrete piers and glass, and a third again recessed, with a heavy roof put down over it.

Back across University Road past the aluminium sculpture by *Auren Wright* is VANDRUGH COLLEGE, 1967, of which the same is to be said as of Alcuin. It has, however, the advantage of a lakeside front. Right by it is the one building of the University where - rightly - fancy is allowed free run. It is the CENTRAL HALL, 1968, and it is a half-octagon with the canted sides to the lake and the upper storeys cantilevered out on that side too. Heavy aluminium roof, the structural members exposed at the apex to form an open turret. Across the lake is GOODRICKE, 1968, with the degree of variety of the early colleges (sculptures by *Alan Robinson*), and the PHYSICS LABORATORY, 1967, whose lake front of five storeys is no asset in the general scenery. It extends a long way back. To the W the newest college, JAMES, 1990-3 by *Hunt Thompson Associates*. Two groups of the now-standard brick accommodation blocks arranged around open courtyards. Terraces of three-storey houses following the pattern of the late 1980s extension of Derwent and Langwath colleges. Yellow brick with blue brick bands. A third phase is planned with dining hall, social and administrative accommodation and further housing units. Alongside work on building the PSYCHOLOGY DEPARTMENT was in progress in 1993.

A delightful iron suspension FOOT-BRIDGE, 1993, leads to WENTWORTH COLLEGE 1972, CLASP with brick additions of 1975 and the big BIOLOGY LABORATORIES, 1968, CLASP, with a concrete clock tower. Finally, to the NE, THE INSTITUTE FOR RESEARCH IN THE SOCIAL SERVICES (IRISS) 1990-2 by *Hunt Thompson Associates*, four brick ranges around a courtyard, and the LYONS CONCERT HALL, 1968, seating 500, brick, with a canted shape and an aluminium roof. Sculpture by *Barbara Hepworth*, 1969. The C19-early C20 brick and pantile DRAMA BARN is the last remnant of the buildings of BLEACHFIELD

FARM which stood on the site. Its name has been used for the nearby housing designed by the *University Design Unit* (*David Greave*).

HESSE

0020

Hesse was little more than a large agricultural village until the late C18 and early C19 when a number of events initiated its growth as a dormitory settlement for Hull. Land was released for building by the enclosure of the open fields in 1796 and almost immediately Hull merchants began building large villas to the W of the village. The suitability of the area for such developments was further enhanced by the provision of a direct road from Hull to Hesse in 1826 and, more significantly, by the opening, in 1840, of the Hull-Selby railway with a station at Hesse. The developers then moved in, and the population of 681 in 1801 rose to 1,625 by 1861 and to 3,918 by 1901. In 1906 J.E. Morris noted that Hesse was 'now quite suburban to Hull ... but traces remain of the old country village among masses of modern villas'. These traces have been eroded further this century but the concern expressed by Pevsner in 1972 that the identity of this small town might be destroyed by the Humber Bridge has not been justified. The population of Hesse in 1991 was 13,818.

ALL SAINTS. This fine stone church which dominates the centre of the town looks authentically medieval. It is indeed essentially late E.E. with a Perp W tower and spire but such substantial alterations were carried out in the C19 that they need to be initially described for an understanding of the present structure. In 1841 *C. Appleton* had rebuilt the N side of the chancel replacing the brick walling and heightening the arcade. A full restoration was then undertaken by *Cuthbert Brodrick* in 1852-3 but the greatest changes took place in 1868-71 under the supervision of *R. G. Smith*. The chancel and its side chapels were taken down and rebuilt further to the E, the nave was lengthened by two bays to the E and the aisles rebuilt almost trebling their original width. The area of the church was doubled.

Of the Norman church little remains except reused masonry and a collection of fragments built into the N wall of the chapel S of the chancel. They include corbels and bits of elaborate C12 windows with beakhead and zigzag decoration. The church was enlarged in the early C13 by the addition of narrow aisles. The late E.E. N doorway with four orders of shafts and fillets on the arch rolls is of this period, as are the N doorway and of course the arcades. The arcades are in their W parts of three bays with round piers and round capitals. The capitals are painted with scrolls and in one case a design of trefoil-ended stalks and intersecting arches. Although repainted, they provide rare evidence of the decoration of E.E. moulded capitals (DP). The arches are moulded on the S, double-chamfered on the N side. The S arcade seems stylistically earlier. The two easternmost bays to N and S are part of the Victorian rebuilding.

The E chancel arch, raised by *Smith, Brodrick & Leather* in

Architect *David Harvey* with the Porter Street Flats, 1928 and Kingston Upper School, 1937. R. Harvey also built a series of innovative primary schools to serve the extensive suburban housing estates. Here too were built the new Anglican churches, those in Hull by *Milner & Crace* (St Aidan, 1935, St Alban, 1938, St Martin, 1938-9, and also at Withernsea, St Matthew, 1934-5) and at York by *Brierley* (St Chad, 1926) and *Lackaby* (St Hilda, 1933-4). They are all of brick, usually with round-headed lancets and impressive interiors, white-painted or exposed brick, with round-arched arcades and passage aisles.

Finally to the architecture of the POST-WAR PERIOD. In the seventy years after the Second World War two local architects, *George G. Pace* (1915-75) of York and *Francis Johnson* of Bridlington rose to more than local prominence, working in contrasting styles and increasingly different fields. Pace was a major figure in post-war ecclesiastical architecture. He successfully combined the traditional strengths of architecture with an individual Modernism, and was a true disciple of the Arts and Crafts movement, admiring among others the churches of Temple Moore and Sir Ninian Comper. His main works covered by this volume are the Holy Redeemer, York (1959-65) which incorporates features from the demolished St Mary Bishophill Senior with great originality, and St Martin-le-Grand, Conee Street, York reconstructed after war damage (1956-68). Large numbers of local churches include unmistakable fittings by Pace mostly in his distinctive Perp-inspired style adopted in the mid 1960s - seating, light fittings, organ cases, font covers and new glazing. He also designed memorials including those at Sledmere to Dame Virginia Sykes † 1970.

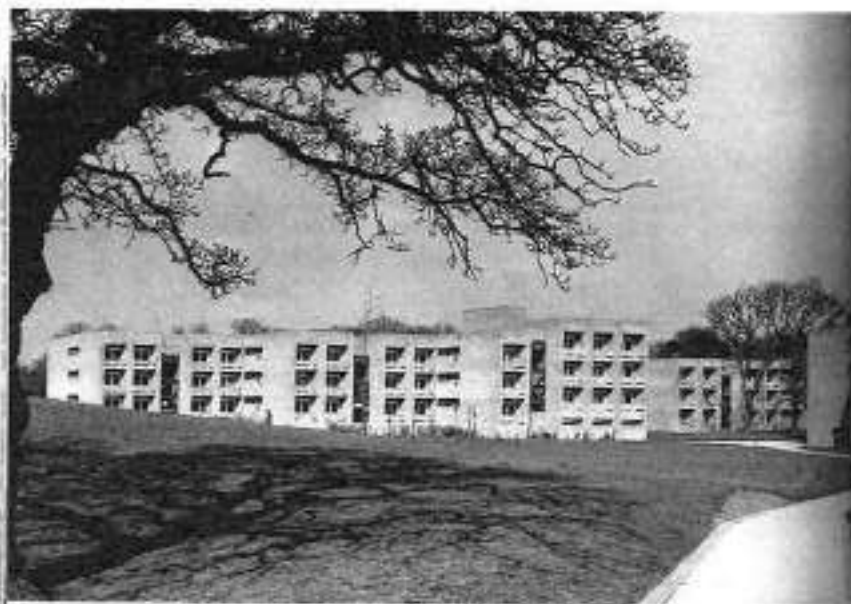
Pace was almost solely a church architect but *Francis Johnson*, although responsible for a number of fine original churches (e.g. Hilston, 1936-7, and St Michael and All Angels, Hull, 1937-8), is best known for his country-house work. Johnson, born in 1911, has been in practice at Bridlington since 1935. Pace's inspiration was primarily Gothic and vernacular, but that of Johnson is primarily Classical - the Classical of the Georgian period. Although his buildings are more directly inspired by an historical style Johnson is no more a practitioner of a thin historicism than Pace. His buildings are unmistakably in the tradition of John Carr, yet have a lightness and practicality attuned to the later C. 20. This is particularly evident at Sunderlandwick (1962-3), Settrington (1963) and Garrowby (1981-2) and in the admirable remodeling of Everingham and of Houghton. The restoration of Fairfax House, York and the long gallery at Burton Agnes illustrate the architect's skills and those of the craftsmen employed. In all this work Johnson, like Pace, has drawn on the work of Yorkshire craftsmen, amongst them the carver *Dick Bird* of York, plasterer *Leonard Speed* of Bradford and the successive Kirkhymonshire blacksmiths, *Wright Denton* and *Michael Hammond*. Other than the work of Pace and Johnson and *James Gwynne's* ingenious extension to York Theatre Royal of 1967-8, the best architecture of the 1960s was confined to the UNIVERSITIES. Hull, founded 1928 as a University College, became a full university in 1954. York was created in 1960. Their conception of a university and their approach to architecture was as different as can be - Hull unusual, York novel. At Hull it was a case of providing increased

teaching and research accommodation on the existing campus. Here the style of the original Neo-Georgian blocks of 1928, by *W.A. Forsyth & Partners*, persisted in new developments until the late 1950s when a plan for the whole campus was drawn up by the architect *Sir Leslie Martin*. He also designed the best of the buildings (Larkin Building and Middleton Hall), avoiding any assertiveness - which is more than one can say of the Brynmor Jones Library by *Carole, Park, Dean, Hook* (1966-9). The majority of the halls of residence are at Cottingham, including the exemplary Lawns 119 complex by *Gillespie, Kidd & Coia* (1963), a group of identical brick buildings, rather fortress-like from a distance and shunning the relaxation of the York colleges. On the main site at Hull are other noteworthy buildings including the Gulbenkian Centre by *Peter Moro* (1966-8). Brick is the dominant material with only the concrete Wilberforce Building by *Napper, Errington, Collerton, Barnett, Allott*, 1968-70, deviating from the norm. *The Napper Collerton Partnership* have been responsible for most of the new buildings on the campus since the mid-1970s including Taylor Court, 1991-3, traditional-style brick accommodation blocks around a courtyard.

At York a collegiate-style university was planned in 1962 on an open site adjoining Heslington Hall. The first colleges were opened in 1965. Here, where speed of construction and low cost was essential, the CLASP system was accepted as the building technique, i.e. a modular system of prefabricated parts. This, with the exception of very few buildings, was applied everywhere. The architects *Robert Matthew, Johnson-Marshall & Partners* (*Andrew Derbysire*) avoided monotony by setting the buildings in a varied landscape with a large serpentine lake as the unifying feature. The most original building is the Central Hall, 1968, a half-octagon cantilevered over the lake. 120 It was not until the late 1980s that the first major break was made from the original concept, with the design by *Hunt Thompson Associates* of brick accommodation blocks in a traditional style around open courtyards as at Hull.

The third university, Humberside, created 1992, has a diverse group of buildings belonging to former institutions and lacks any mid- to late C. 20 buildings of note. Of other educational buildings the most controversial is the futuristic Perronet Thompson School, 124 Hull, 1987 by *Peter G.H. Dale, Humberside County Architect* (job architects: *C. Ratcliffe-Springall* and *D. Thomas*), an exciting industrial-style building that brings some life to Bransholme, Europe's largest local-authority housing estate. Bransholme, developed from the late 1960s, displays none of the vision that inspired the Garden City Movement. The greatest advance in housing in the last twenty years has been the return to 'inner-city' living in York, Hull and Beverley and the development of human-scale court housing in both the private and public sector. The work in this field of the *York University Design Unit* and its former members is particularly praiseworthy.

The development of planning control through Conservation Areas since the late 1960s and the increased awareness of the value of the whole historic environment has made large-scale developments a sensitive issue. Architectural innovation has not been totally obliterated and there have been some successes, particularly in York,



119. Corringham, University of Hull, The Lawns residential buildings, by Gillespie, Kidd & Coia, begun 1962
 120. Heslington, University of York, Central Hall, by Robert Matthew, Johnson-Matshoff & Partners, 1968
 121. Garrowby Hall, south range by Francis Johnson and Malcolm McKie, 1981-2, tower on left c. 1909
 122. York, Holy Redeemer, by George G. Pace, 1962-4
 123. Hull, Crown Court, by Building Design Partnership, 1958-92



University of York - Campus East Extension (CEE) Transport Statement

PROJECT NUMBER	70045394-TP1	Status	Version 5
PROJECT NAME	UoY Local Plan Transport Statement	DATE	27.03.18
		Drafted by:	Jon Phillip
CLIENT	University of York	Checked by	Simon Pratt

1. INTRODUCTION

1.1. BACKGROUND

- 1.1.1. My name is Simon Pratt and I am a Technical Director for WSP in the Development Business Line. I have an honours degree in Civil Engineering and have been working in traffic and transportation for over 25 years. I have been working on projects in York for the duration of my career and have been involved with the development of the University Campus for the last 20 years.
- 1.1.2. WSP has been commissioned by the University of York (the University) to provide Transportation evidence for the University's representations to the City of York Council's (CoYC) Publication Draft Local Plan which is currently out to consultation. This Transport Statement provides an initial assessment of the likely transport impact of the allocation of land described below which is to the south of the existing Heslington East campus (Heslington East was granted planning approval by the Secretary of State in June 2007).
- 1.1.3. The University has planning permission at Heslington East for 65ha of development land, of which around 30ha remains undeveloped. Proposals exist for additional development within the next five years. For the purposes of this report, the site granted planning consent in 2007 and located between Heslington Village and the A64 is referred to as *Heslington East*; the part of the university campus existing before 2007 is referred to as *Heslington West* and the proposed allocation south of Heslington East is referred to as the *Campus East Extension (CEE)*.
- 1.1.4. Based on the current expansion rate the University will clearly run out of area for growth during the 2020s, well before the end of the Local Plan period. The draft council allocation at 21.5 ha (13ha of which is developable) is smaller than the University's proposal of 26ha. This document assesses the proposed 26ha site and therefore considers the most robust case in terms of potential transport impact. The proposal is to allocate the 26ha of land to the south of the existing lake for university and associated business uses.
- 1.1.5. This Transport Statement compares the actual level of development at Heslington East with the assumptions made when the Transport Assessment was considered in the 2007 Inquiry, and sets out the reasons why a new detailed Transport Assessment would not be needed in support of the proposed allocation at the Campus East Extension (CEE). Section 2 discusses the existing Heslington East site and what has been achieved to date in



terms of sustainable transport.

2. HESLINGTON EAST

- 2.1.1. The planning permission for Heslington East granted in 2007 permitted a significant expansion in university facilities to accommodate an increase of around 5,500 students, 2,000 staff and 2,500 staff in associated 'knowledge transfer' businesses.
- 2.1.2. The design philosophy of the Heslington East campus was to give particular priority to sustainable modes over car travel, with a hierarchy that mirrors that which was adopted by City of York Council, considering users in the following order of priority:-
 1. Pedestrians;
 2. People with mobility problems;
 3. Cyclists;
 4. Public transport users;
 5. Car borne visitors; and
 6. Car borne staff and students.
- 2.1.3. The site was designed and has been built out to restrict car access to disabled users and service vehicles which access limited parts of the site using defined cul-de-sacs. Car parks serving the site have been restricted to the periphery of Heslington East and this approach and the site design has been highly successful in creating a 'car free campus' to make the site a pleasant environment in which to study, work and live and travel around on foot and by bike.
- 2.1.4. Comprehensive, signed walking and cycling networks have been implemented across Heslington East (and Heslington West) which facilitate safe and efficient movement around the campus.
- 2.1.5. In addition, the University is strongly committed to the promotion of sustainable travel and this has been demonstrated during the build-out of Heslington East through the development and implementation of an extremely successful Sustainable Travel Plan which is informed by annual staff and student surveys which determines travel patterns of the main university users and annual transport surveys undertaken each March which record all movements to and from the campus (by all modes).
- 2.1.6. Notwithstanding the level of development which has taken place across Heslington East and the substantial increase in staff and student numbers, the University has made significant progress in reducing the proportion of trips by vehicle and increasing trips on foot, by bike and by bus. Between 2010 and 2015 the number of vehicle trips decreased, whilst the combined staff and student population increased by 22.5% over the same period. During the same period, walking, cycling and bus trips to/from the university increased substantially (Source: University of York Sustainable Travel Plan Strategy 2015-2020). **Table 1** below, shows the percentage modal split for journeys to/from the University from the annual Transport Surveys. **Table 2** shows the actual numbers identified in the annual surveys.

Table 1

Calculated Percentage Modal Split of trips to/from the University (2010-2015)

Mode	2010-11	2012-13	2014-15	2016-17
Vehicles	30.2	24.6	23.3	22.5
Cyclists	12.6	14.1	14.7	13.4
Pedestrians	38.7	39.0	38.6	41.3
Bus	18.5	22.3	23.4	22.8
Total	100	100	100	100

Source: University of York, Annual Transport Survey results

Table 2

Absolute Modal Split of trips to/from the University (2010-2015)

Mode	2010-11	2012-13	2014-15	2016-17
Vehicles	10380	9735	10092	10333
Cyclists	4347	5650	6397	6159
Pedestrians	13342	14962	16775	18995
Bus	6376	8844	10150	10485
Total	34,445	39,191	43,414	45972

Source: University of York, Annual Transport Survey results

2.1.7. The university has built successful partnerships with CoYC, iTravel York (the Council's sustainable travel information programme) and a number of local bus operators to promote sustainable travel to/from the campus.

2.2. TRANSPORT RELATED CONDITIONS

2.2.1. There were a number of conditions imposed on the university as part of the 2007 outline planning permission, of which four related specifically to traffic and parking:-

- **Condition 6** – Traffic Survey of identified junctions;
- **Condition 7** – Identify traffic generation for reserved matters applications over 500 m²;
- **Condition 8** – Implementation review and monitoring of the sustainable travel plan;
- **Condition 9** – No more than 500 parking spaces to be provided on first occupancy, no more than 1500 parking spaces in total;

2.2.2. These conditions have enabled City of York Council to monitor the success of the Travel Plan measures and control the amount of university-related vehicular traffic using the three main vehicle routes into the university which are

- Grimston Bar / A64 / A1079 / A166 signalised roundabout;
- Melrosegate / Green Dykes Lane / Hull Road traffic signal controlled junction; and
- Fulford Road / Heslington Lane traffic signal controlled junction.

2.3. DEVELOPMENT TO DATE AT HESLINGTON EAST

- 2.3.1. In the original outline application the likely transport impact (particularly that of vehicular traffic) was determined based on predicted numbers of students, staff and related research companies staff (in agreement with CoYC) rather than specified floor areas. In the approved TA (Table 5.9), the highways assessments were undertaken based on predicted staff and student numbers after full development of Heslington East of 19,951 for the whole university plus 4000 related research company staff. The section of the approved TA with cover page and relevant extract of Table 5.9 is included in **Appendix A**.
- 2.3.2. Statistics provided by the University's Sustainable Transport Officer for academic years 2017/18 and staff numbers for 2018 indicate a current staff number of 4,218 and student numbers for the whole university of 16,500 FTE (20,718 staff and students (FTE) in total). It is understood from a 2012 Transport Statement in support of a reserved matters application for a residential unit (College 9 – application reference on Heslington East that 1,172 staff are employed in university-related research company staff). Clearly, the current number of university-related research company staff is significantly less than was assessed in the outline application for Heslington East, whereas the staff and student numbers are broadly in line with what was forecast in the 2004 Transport Assessment.
- 2.3.3. Furthermore, the development to date at Heslington East has resulted in a greater proportion of student residential accommodation than was originally anticipated partly to address the issues across the city in accommodating the increasing number of students. Notwithstanding the level of development implemented to date and the increases in staff / student numbers, the number of vehicle movements to/from the university has decreased. This is due to the design of the site and success of the University's Travel Plan.
- 2.3.4. Whilst the level of accommodation provided has been greater than that originally anticipated, the level of teaching facilities and university-related businesses has been significantly less than that assessed in the outline application. As student residential accommodation serves the students already on campus it has a very small impact in terms of additional vehicular trips on the surrounding highway network. As such, the peak hour vehicle trips to/from Heslington East (derived using the Heslington East Traffic Model which was agreed with CoYC as part of the Outline planning process) have not been as great as anticipated at the outline planning stage.

The development which has taken place to date on Heslington East comprises around 35ha. In terms of parking, there are approximately 425 car parking spaces provided on Heslington East which have been provided on a pro-rata basis as reserved matters developments have come forward. The only exception to this was the provision of additional car parking for the Catalyst building to attract occupants, as a number of which had been dissuaded by the lack of parking. Since the installation of the additional car parking the units have now become fully let. The proposals on CEE are for a 26ha site. Assuming a similar breakdown of academic, residential and business space as on Heslington East, the resulting total number of car parking spaces would be well within the overall cap of 1500 spaces in total which was agreed for the Heslington East application in 2007 (planning condition 9). It is proposed that the business uses on the CEE will have a similar parking ratio to that on Heslington East, to ensure sufficient is provided to attract occupants. It is therefore unlikely the existing parking cap (1500 spaces) would need to be exceeded.

3. CAMPUS EAST EXTENSION (CEE)

3.1. PROPOSED ALLOCATION

- 3.1.1. The CEE site comprises approximately 158k m² GIA of development consisting of Residential, Academic, Business and ancillary development such as social space and car parking.

3.2. ACCESS

- 3.2.1. The proposed site would be accessed off the existing Lakeside Way, using one two-way access road to provide vehicular access to a single car park and to provide access for buses and service / delivery vehicles. A turning facility would be provided in the site to enable vehicles to turn and leave the site. It is anticipated that a number of pedestrian walkways would be created linking the new site with Heslington East and providing easy access to/from the existing bus stop facilities along Lakeside Way. This is the same approach as adopted on Heslington West.
- 3.2.2. In terms of vehicular access, vehicles can access Lakeside Way from either Field Lane or Hull Road and use Kimberlow Lane to access Lakeside Way. Kimberlow Lane forms part of the university campus and runs along the northern boundary of Heslington East. This approach means that vehicles to/from the west (Fulford direction) would be able to access the CEE site without having to use Hull Road. This would limit the amount of vehicles using Hull Road to just those accessing from the east and north.
- 3.2.3. The extensive and high quality cycling and pedestrian routes from Heslington East will be extended into the CEE site to ensure a high proportion of trips using these modes.
- 3.2.4. Student Residential areas will have controlled vehicular access system to enable students to load/unload their possessions. In situations at the beginning and end of terms when students arrive / depart to/from the university accommodation. This is a managed approach and has been proven to work effectively elsewhere.

3.3. TRIP GENERATION

- 3.3.1. Just over half of the proposed Gross Floor Area of the proposed allocation at CEE would provide student residential accommodation to house the increasing number of students on the wider campus. Development over the last decade on Heslington East has demonstrated that student residential accommodation has a negligible impact on vehicle trips to/from the site. This is due to a combination of factors including the design of the site, the university's policies on restricting parking on site (to a small number including disabled students and those on placements) and the university's successful Travel Plan. It can therefore reasonably be concluded that the residential accommodation on CEE would result an almost negligible increase in peak hour vehicle trips on the local highway network as the University would continue with its rigorous approach to sustainable travel.
- 3.3.2. Only around 15% of the CEE site (around 24,000 m² GIA) is proposed to provide buildings to accommodate collaborative businesses and 'Knowledge Transfer' companies and around 32,000 m² GIA for academic uses. Whilst 'Knowledge Transfer' companies and academic staff are likely to be the main generators of vehicle trips, the scale of the business uses are small in comparison to the residential and academic buildings.



- 3.3.3. Based on a typical employment density of 12m² per Full Time Equivalent (FTE) job, 85% Gross Internal Area to Net Internal Area of employment space and an assumed occupancy rate of 90%, the proposed employment areas on the CEE site would equate to around 1,520 jobs when fully built out and 90% occupied.
- 3.3.4. The Transport Assessment for the Heslington East outline application assumed a total of 4000 staff in 'Knowledge Transfer' businesses across the university and the current figure sits at around 1,172 employees (see 2.3.2 above). It is considered therefore that even allowing for the anticipated employment development on the CEE site of around 1500 jobs (3.3.3 above), the overall number of employees in university-related businesses would still fall well within the figures set out and assessed in the approved 2004 Transport Assessment. In terms of university staff, the proposed additional academic space on the CEE site would require an increase of academic staff on a pro-rata basis.
- 3.3.5. Notwithstanding the proposed increases in employees and academic staff (which are the most likely to result in vehicle trips) it should be borne in mind that despite all the development to date on Heslington East, vehicular traffic movements to/from the University have actually reduced and there is therefore capacity on the highway network to accommodate further development.

3.4. PARKING

- 3.4.1. Although the CEE site sits outside the area granted planning consent in 2007, it is proposed that the car parking provided would be limited given the university's wider commitment to sustainable transport and its success to date in delivering an effective Travel Plan. Car parking on the CEE site plus parking on the existing Heslington East site will be of a level less than the overall parking cap of 1500 spaces identified in condition 9 of the 2007 planning consent for Heslington East.
- 3.4.2. It is proposed that disabled parking, motorcycle and cycle parking would be provided in accordance with the CoYC parking standards. Cycle parking will be provided in secure and convenient locations (as on Heslington East) to encourage cycle journeys to/from and around the campus.

3.5. BUS ACCESS

- 3.5.1. The CEE access road connects with Lakeside Way which forms a bus and cycle only link and serves the bus routes accessing the wider university. It is anticipated that a number of walkways / cycleways would be constructed over the existing lake to provide direct access from the CEE site to the existing high-frequency bus routes which serve the existing campus and City Centre. On this basis most of the CEE site would fall within 400m of existing bus services on Lakeside Way.

3.6. PEDESTRIAN AND CYCLE ACCESS

- 3.6.1 As indicated above as part of the design footways and cycle ways would be created across the lake in the form of bridges. These route will enable easy access from CEE to the existing campus and beyond. This replicates the facilities on the Heslington West Campus. Low Lane would be stopped up as a route on the west side of the site to prevent excessive number of staff and students passing through Heslington Village but would also prevent unauthorised vehicular access.

4. SUMMARY & CONCLUSIONS

4.1. SUMMARY

- 4.1.1. This TS examines the potential transport impacts of proposals to allocate further land to the south of Heslington East to safeguard future university expansion. The Campus East Extension (CEE) site would provide further residential accommodation (around half of the site) plus additional academic buildings and accommodation for related 'knowledge transfer' businesses.
- 4.1.2. During the design, development and operation of Heslington East, the University has maintained a strong commitment to sustainable travel in accordance with the Heslington East planning conditions and this has resulted in a reduction in car trips to/from the campus and a significant increase in trips by bus, on foot and by bicycle as evidenced by the annual transport surveys.
- 4.1.3. At the outline planning consent stage, the assessments allowed for around 4000 people employed in 'knowledge transfer' businesses but only around 1200 people are employed in these businesses at the university, well within the number which was assessed. As part of the proposed development it is not expected that 4000 employees will be exceeded.
- 4.1.4. The Heslington East development has included a significant proportion of student residential accommodation and this results in very few vehicular trips as the accommodation serves students based on the campus.
- 4.1.5. It is proposed that 51% of the CEE site would comprise residential accommodation based on experience to date this development on Heslington East, would add almost no vehicle trips to the local road network.
- 4.1.6. Whilst the CEE site would also include some 'knowledge transfer' businesses and academic space it is anticipated that the total number of employees across all campuses (even including for the CEE site) would be less than that which was assessed as part of the approved 2004 Transport Assessment.

4.2. CONCLUSIONS

- 4.2.1. Given the success of the University's Travel Plan initiatives and partnerships with City Council and Local bus operators, enormous increases have been achieved in students and employees in travelling to/from the University by sustainable modes. In addition, the number of car parking spaces provided on the Heslington East site is still well within the 1500 space 'cap' established by planning condition in 2007 and vehicular trips have been reduced despite the level of development which has been implemented at Heslington East.
- 4.2.2. Taking into account the assumptions previously made in the 2004 Transport Assessment regarding staff, student and employment numbers and the evidence of the results of the annual transport surveys which have shown a decline in vehicular trips to/from the University and increase in use of sustainable modes, it is considered that further development could be achieved on the CEE site without exceeding the traffic generation on the local highway network previously assessed and approved for the Heslington East site.



APPENDIX A – Extract from Approved Transport Assessment (04/01700/OUT)

THE UNIVERSITY *of York*

Outline Planning Application
Heslington East Campus Extension

April 2004

Document 3
Volume 2

Transport Assessment

<i>Document No:</i>	3(2) of 9
<i>Originator:</i>	FaberMaunsell
<i>Originator's Ref:</i>	30080TYN
<i>Revision No.</i>	6

5.2.3.6 The University’s projections for students, staff and related research company employees at the end of phase two when the development is proposed to be complete are summarised in Table 5.9 below.

Table 5.9 – Predicted Student and Staff Numbers (2016/17)

	Heslington		King’s Manor	Whole University
	West	East		
Students	9532	5576	295	15403
University Staff	2546	1906	96	4548
Related Research Company Staff	1500	2500	0	4000

Source: University of York

5.2.4 FULL CASE DEVELOPMENT SCENARIO (EXISTING MODE SHARE AND CAR OCCUPANCY RATES)

From: Jones, Simon [Simon.Jones@highwaysengland.co.uk]
Sent: 13 April 2018 16:50
To: Stokes, Ian; localplan@york.gov.uk
Subject: York Local Plan response
Attachments: York.docx

Hi Ian and team

Please find attached our response.

I understand that Paul Osborne from Systra had spoken with you a few weeks back, he tells me you've just completed modelling of the York road network, which includes the revised development sites and latest York Central access road alignment and we're expecting those results will be included in the Transport Topic Paper which, along with the next IDP, will be published in May 2018.

All the best for now.

Kindest regards

Simon Jones

Spatial Planning Manager (Yorkshire, Humberside and North East)
Highways England | Lateral | 8 City Walk | Leeds | LS11 9AT

Tel: +44 (0) 300 4702472 | **Mobile:** + 44 (0) 7710 958399

Web: <http://www.highways.gov.uk>

GTN: 0300 470 2472

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Simon Jones
Asset Development Manager
Highways England
Lateral
8 City Walk
Leeds LS11 9AT

Direct Line: 0300 4702472

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

13 April 2018

By email
To localplan@york.gov.uk

Dear Ian et al,

CITY of YORK DRAFT LOCAL PLAN CONSULTATION

We have reviewed the Draft York Local Plan and wish to comment on issues that are relevant to our interests. As you will be aware, we responded to the Local Plan consultation at the Preferred Options stage in July 2013, the Local Plan Preferred Sites Consultation in September 2016 and the Pre-Publication Draft Local Plan in October 2017. Our comments build upon our previous responses and relate to the Local Plan objectives, policies and proposed development sites which potentially impact on the strategic road network (SRN).

Highways England is responsible for the safe and efficient operation of the SRN which, in the York area, consists of the A64 linking the A1(M) with Scarborough.

Our comments are set in the context of Department for Transport Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development which states that:

- Development proposals are likely to be acceptable 'if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed'.
- When considering Local Plan proposals, we are required to assess 'the cumulative and individual impacts of Local Plan proposals on the ability of the



safety'. various road links and junctions to accommodate the forecast traffic flows in terms of capacity and

We therefore require that the capacity enhancements and infrastructure needed to deliver strategic growth is identified at the plan making stage to allow us time to assess the suitability, viability and deliverability of such proposals on the SRN at the earliest opportunity.

Our comments also take account of committed and planned investment in the SRN set out in the Department for Transport's Road Investment Strategy (RIS). There are no committed RIS schemes on the A64 trunk road in the York area. Decisions on schemes to be included in the RIS for the next roads period (2020/21-2024/25) have yet to be made by the government.

The RIS identifies a scheme for the A64 Hopgrove Roundabout (A64/A1237) that is in preparation with the aim of inclusion for implementation in the next roads period. Recently we published a summary of the findings of a feasibility study completed in spring 2017. The main conclusion of the feasibility study was that upgrading to dual carriageway standard of the A64 east of York between the Hopgrove Roundabout and the existing length of dual carriageway at Barton-le Willows should be prioritised for implementation before upgrading of the Hopgrove Roundabout.

As we indicated in our consultation responses in 2013, 2016 and 2017, we believe that spatial distribution and particularly the development of land opportunities in the south and eastern parts of York should be dependent upon agreement between the Council and ourselves of a Management Strategy for the A64 and its junctions with the local primary road network.

At the time of writing, City of York Council had yet to revise its Infrastructure Delivery Plan and the Transport Topic Paper (an annex to the Draft Local Plan) which will include a review of SATURN traffic model results regarding the future traffic impact on the local highway network. It is expected that these reports will be issued when the Local Plan is issued in May 2018. Highways England will need to see both documents.

The remainder of this letter focuses on changes relating to previous comments we have made, recent changes to the main development sites, and policies or proposals that are relevant to the SRN.

Section 1: Background

It would be helpful to include reference to the revised Infrastructure Delivery Plan alongside the Duty to Cooperate Statement (1.9) as this should include proposals for funding and delivery of improvements to the SRN and other infrastructure with relevance to neighbouring authorities.

The A64 is also part of York's strategic road network (1.64) and should be referenced here.

Section 2: Vision and development principles

The Plan lacks a recognition that the scale of traffic growth on the A64 trunk road and its junctions with local primary roads will require physical mitigation in the form of investment in highway infrastructure in addition to extensive sustainable travel proposals.

Policy DP1 York Sub Area does not refer to York's position on the SRN and the importance of improving connectivity in the York Sub Area, exemplified by the recent announcement of West Yorkshire Transport Funding for junction improvements along the A1237.

Policy DP2 Sustainable Development refers to 'improving the strategic highway network capacity'. This applies equally to the city's primary roads and the A64.

Section 3: Spatial strategy

We note the growth targets which include increasing housing by 867 homes per annum and 650 jobs per annum over the plan period and expect that this will have a significant impact on York's strategic road network, which includes the A64.

Although we have not seen the latest Transport Topic Paper which we understand will be issued with the Local Plan in May 2018, we note in Policy T2.14.15 that 'Preliminary transport modelling work undertaken using the City of York's strategic transport model predicts that the volume of traffic on the highway network overall could increase by approximately 20% (an extra 7000 vehicle trips in each peak) by the end of the local plan period. The corresponding predicted increase in travel time across the network is approximately 30% and the increase in network delay is approximately 55%. This level of traffic growth could lead to significant delays being experienced on the radial routes into York, the outer ring road (A64 and A1237) and all routes within the outer ring road.' Furthermore, Table 15.1 shows that projected increases in journey times on the A64 are amongst the highest on the city's road network.

We welcome the statement (3.12) 'It is important that future development does not lead to an unconstrained increase in traffic as this would impose substantial demand on the highway network and could lead to increased congestion if this demand cannot be met by increasing highway capacity alone.'

We welcome Policy T7 Minimising and Accommodating Generated Trips which states 'For strategic development sites, Transport Assessments must, specifically, identify any traffic impacts on the A64 Trunk Road and sections of highways within York's neighbouring authorities arising from the proposed development individually or in combination with other strategic sites and any mitigation including physical capacity



enhancement measures thereon (including junctions and approaches) must be agreed with Highways England and neighbouring highway authorities, as appropriate.'

We have commented on the proposed development sites in our letter of 23rd October 2017 and note the proposed increase in housing and employment at York Central, and the reduction in housing at the Queen Elizabeth Barracks site.

We welcome reference to the need for individual and cumulative traffic impact assessments for these sites. However, some of the strategic sites refer to the cumulative impact with other sites but not all the sites have a reciprocal reference about the individual and cumulative impact, for example ST7 and ST8 should both include reference to Sites ST35 and ST15. For completeness, all the sites mentioned should have reciprocal comments.

We expect that the strategic sites located around the A1237 Northern Ring Road will combine to have a significant impact on the junctions of the A1237 with the A64 east and west of York. We will therefore need to have a good understanding of that cumulative impact, and the scale and nature of any improvement required, before we can state that the Plan is sound.

Site Transport Assessments must demonstrate that all transport issues have been resolved and Highways England will need to agree these, in particular, at those sites likely to have the greatest impact on the A64.

We have additional comments regarding the following sites:

Policy SS4 York Central. We welcome the statement that one of the principles of the development is to 'Demonstrate that all transport issues have been addressed, in consultation with the Council and Highways England as necessary, to ensure as many trips as possible are taken by sustainable travel modes and promote and facilitate modal shift from the car.'

Policy SS13 Land West of Elvington Lane. The proposed Garden Village will have a primary access via the A64 with a secondary access via Elvington Lane. For this 'out of town' development to deliver an 'exemplar sustainable community' (Section 2, 2.5) including sustainable transport, we would like to see more clarity around proposed parking standards and plans for a suitably direct and attractive public transport link towards the University and York City Centre. This is supported by other statements, including:

- 1) Policy ED3 Campus East: 'ST27 will be accessed from Hull Road via Campus East. In addition, the development should exploit any shared infrastructure opportunities arising from the proximity of the housing allocation at ST15: Land to the west of Elvington Lane to the University of York.'

2) Policy T1.14.5 Sustainable Access: 'Roads providing a new direct vehicular through route will generally not be supported, as these are likely to attract car traffic from more major roads. However, controlled through access for buses and

cycles are encouraged and through routes that offer sufficient deterrent to general car traffic may be supported. Where any new through route for all traffic is proposed, it is important that the potential impacts are minimised.'

- 3) Policy T2 Strategic Public Transport Improvements refers to a 'dedicated public transport/ cycle route linking the new settlement (ST15) to a suitable access on York's highway network in the urban centre of York (subject to confirmation of the developer's access proposals to site ST15) as a medium-term investment (2022-27). This improvement should be implemented as early as possible to help establish public transport patronage and reduce the impact on the SRN.

Policy SS20 Imphal Barracks, Fulford Road. The Plan states that 'There are existing issues with traffic congestion in this area. The base traffic situation on the A19 is that it is at or exceeding capacity near Heslington Lane/Broadway. The potential transport implications of the site must be fully assessed both individually and cumulatively with site's ST5 and ST15.' Whilst the site is not expected to be developed until the end of the Local Plan period, the section of Fulford Road between the proposed development and the A64 is already within an Air Quality Management Area. Highways England therefore wishes to be consulted as part of the Transport Assessment and Air Quality impact assessment for this site.

Section 4 Economy and retail

Policy EC4 Tourism. Highways England needs to understand the scale of growth in tourism which is expected. York is a year-round tourism destination which attracts over 7 million visitors, many of whom arrive by car using the SRN.

Section 14 Transport and communications

Policy T2 Strategic Public Transport Improvements. We welcome the inclusion of a dedicated public transport / cycle route linking the new settlement (ST15) to a suitable access on York's highway network in the urban centre of York (subject to confirmation of the developer's access proposals).

Policy T4 Strategic Highway Network Capacity Improvements. We have agreed in principle the inclusion of the new access off the A64 to serve Land West of Elvington Lane (ST15) as a proposed medium term improvement and support the addition of an onward public transport/cycle only link towards the University and City Centre (see



comment above on Policy T2). We ask that you include reference to the proposed improvement at Hopgrove.

We would like to see details of York's strategic highway network capacity improvements as soon as the Infrastructure Delivery Plan is published (14.39) and expect to see evidence that the remaining junctions on the A64 around York will not require further improvements during the Plan period.

Policy T7 Minimising and Accommodating Generated Trips is of key interest to Highways England. We welcome inclusion of the statement 'For strategic development sites, Transport Assessments must, specifically, identify any traffic impacts on the A64 Trunk Road and sections of highways within York's neighbouring authorities arising from the proposed development individually or in combination with other strategic sites and any mitigation including physical capacity enhancement measures thereon (including junctions and approaches) must be agreed with Highways England and neighbouring highway authorities, as appropriate.'

We also welcome statement 4.52 'Where developments are in close proximity, developers should liaise with the Council and Highways England, as necessary, to establish whether a joint master travel management plan may be required.'

Policy T8 Demand Management – we understand that revisions to the Council's Parking Standards, contained in the 'Sustainable Transport for Development' SPD, have yet to be updated. Highways England wishes to be consulted on these standards.

Section 15 Delivery and monitoring

Section 15.18 states that 'Strong emphasis will be placed on providing improvements to public transport and more active forms of transport, particularly as access to these forms of transport

were key considerations in determining the accessibility of sites for their allocation within the plan. However, it is also acknowledged that major enhancements to the highway network will also be necessary.' This should include capacity enhancement schemes on the A64.

Policy DM1 should include an additional reference to the need for developers to contribute to mitigation schemes on the A64.

Glossary

We suggest that a definition of York strategic road network is included, making it clear that York's strategic road network also includes the A64, and which forms part of the Highways England SRN.

Summary

The following bullet points provide a summary of the key issues within the review:

- The A64 should be included within the plan definition of York's strategic road network.
- We can confirm that a new access on the A64 has been agreed in principle to serve land west of Elvington Lane as highlighted in Policy T4. The junction layout

is not yet agreed and is subject to approval of acceptable proposed alignment and design.

- Policy SS4 (York Central) should include reference to the A64 Hopgrove Roundabout improvement (A64/A1237) that is currently in preparation, with the aim of inclusion for implementation in the next roads period.
- Highways England is supportive of the principle stated in Policy T7 that strategic development sites must specifically identify any traffic impacts on the A64 arising from proposed development, individually and in combination with other strategic sites, and any mitigation including physical capacity enhancements required. These must be agreed with Highways England and neighbouring authorities as appropriate.
- We expect that the strategic sites located around the A1237 Northern Ring Road will combine to have a significant impact on the junctions of the A1237 with the A64 east and west of York. We will therefore need to have a good understanding of that cumulative impact and the scale and nature of any improvement required if we are to be able to state that the Plan is sound
- The plan contains strong policy direction on sustainable transport. However, sustainable transport provision in isolation is insufficient to accommodate York's development aspirations, and both demand management and physical capacity improvements will be required.

We believe that spatial distribution, particularly the development of land opportunities in the south and eastern parts of York, should be dependent upon agreement between the Council and ourselves of a Management Strategy for the A64 and its junctions with the local primary road network. At the time of writing, City of York Council has yet to revise its Infrastructure Delivery Plan and the Transport Topic Paper for the Draft Local Plan. We would expect these documents to specify mitigation measures, including capacity enhancements required to the A64 and its junctions, supported by evidence. Until we have seen these documents, we are not able to confirm that the plan is sound because it is unclear if the plan will be effective and deliverable.

I hope that the above comments are helpful. Should you require further information or clarification, please do not hesitate to contact me.

Yours faithfully,



Simon Jones
Regional Spatial Planning Manager
Email: Simon.Jones@highwaysengland.co.uk



Name:
Address

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

Dear City of York Council.

I am writing to provide my feedback and outline my support for the Local Plan Publication Draft 2018.

As a resident of York, I believe it is essential that we submit a plan that directly addresses the local pressures in our housing market, but at the same time, guarantees the protection of the greenbelt and York's natural beauty.

Overall, I judge that the City of York: Local Plan Publication Draft, Policies Map, Sustainability Appraisal and Strategic Environmental Assessment to be 'sound' documents. However, more specifically, I feel the following principles within the current draft of the Local Plan are crucial for the future development of York.

- The plan gives good protection of York's Greenbelt, protecting our unique City. ✓
- Given that population figures are predicted to be lower than estimated by the Government, the plan provides enough houses for the people of York.
- From delivering roughly 500 houses per annum, to nearly 1000 house per annum, I believe that through the housing delivered under the plan, affordability will be improved in York.

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

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

Signature:

[Redacted Signature]

Date:

23/11/18.

Name:
Address

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

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- ✓ • The plan gives good protection of York's Greenbelt, protecting our unique City.
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- ✓ • From delivering roughly 500 houses per annum, to nearly 1000 house per annum, I believe that through the housing delivered under the plan, affordability will be improved in York.

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✓ It is essential that the people of York retain control of this process and ultimately, decide on the future of York itself.

Signature:

[Redacted Signature]

Date:

26-4-18

Kindly send notice of receipt to the Clerk email



sent 20 March 2018



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

OFFICE USE ONLY:
ID reference:

RECEIVED
21 MAR 2018

BY: _____

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	SAMGS	
Last Name	MACKMAN	
Organisation (where relevant)	UPPER POPPLETON P.C.	
Representing (if applicable)	PARISH COUNCIL	
Address – line 1	[REDACTED]	
Address – line 2		
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		
E-mail Address		
Telephone Number		

Guidance note

Where do I send my completed form?

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

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

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

What can I make comments on?

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

Do I have to use the response form?

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

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

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

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

Do I need to attend the Public Examination?

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

Where can I view the Local Plan Publication Consultation documents?

You can view the Local Plan Publication draft Consultation documents

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

Part B - Your Representation

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



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

City of York Local Plan Publication Draft

Policies Map

Sustainability Appraisal/Strategic Environmental Assessment

What does 'legally compliant' mean?

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

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

Yes

No

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

Yes

No

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

There are frequent errors in the policies with contradictions to the NPPF see attached.

What does 'Sound' mean?

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

What makes a Local Plan "sound"?

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

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

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

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

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

Yes

No

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

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

Positively prepared

Justified

Effective

Consistent with national policy

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

(Complete any that apply)

Paragraph
no.

Policy
Ref.

Site Ref.

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

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

See attached detailed
and page referenced information

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.

Changes are detailed in
attached documents.

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

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



Yes, I wish to appear at the examination



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

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

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

Part C - How we will use your Personal Information

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

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

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

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

Storing your information and contacting you in the future:

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

Retention of Information

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

Your rights

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

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

Signature



Date

20/3/18.

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

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Comments from Upper Poppleton Parish Council in response to the 2018 consultation on the preparation, justification, effectiveness and consistency of the Local Plan with the National Planning Policy Framework.

The Parish Council recognises that a great deal of work and time has gone into the preparation of this Draft Local Plan 2018. Many of the policies and other documents are supported by the Nether Poppleton Parish Council.

The attached comments are a response to the consultation where inconsistencies and inaccuracies which affect the soundness of the Plan have been noted. Adjustments have been suggested to the justification consistency and effectiveness of critical points where appropriate.

Site	Policy ref	Pg ref	Policy name	Comment
	SS2	31	Role of the Green Belt The policy needs to be view with GB1 and ENV 1 . Reference saved RSS policies Reference Upper and Nether Poppleton Neighbourhood Plan made October 2017 p18 4.1.10	<ul style="list-style-type: none">• The key role of the Green Belt is to prevent coalescence between urban areas and the rural areas. This fact is missing from the policy.• The arbitrary notion of 6 miles does not follow any logic as the outer ring road is sometime 4 miles from the City centre yet the area is rural, agricultural land.• There needs to be a real permanence to the Green Belt extending beyond the length of the plan.• Development around York should preserve the character and setting of the City and also of the ancient villages with their 12-14 century buildings.• The rural nature of the Green Belt should also preserve the land patterns and hedgerows. Not mentioned in the Policy.• There is a failure to identify exceptional circumstances as obstruction to development of transport links is missing.• The City Planners have removed references to upgrading the Outer Ring Road specifically between the A 19 and the Hopgrove Roundabout which currently any time of the working day is at a speed of 5 mph.
ST 20	SS 5	38	Castle gateway area	<ul style="list-style-type: none">• The proposed removal a carpark in this area is supported.• A pedestrian precinct on green park land to provide extra way of reducing air pollution.

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				<ul style="list-style-type: none">• It is clear that this area flood extensively when the Rivers Ouse and Foss are at their highest.• York City Council has insisted on developing many Park and Ride Schemes for many of the main roads in and out of the City.• Parking therefore should be encouraged in those areas and not in the centre of this medieval city which was not designed for 21 C traffic.• There is sufficient parking for cars in York as there are currently 17 car parks within the city at the present time.• The area has many tourist features which should be protected from erosion by CO2 emissions. (Park and Ride Scheme issues discussed elsewhere in this document.)
ST1	SS6	42	British Sugar/Manor School	<ul style="list-style-type: none">• The need to preserve some of the green landscape and mature trees has not been written into the Policy. This includes mature trees, hedgerows and other wildlife features that lie within the site particularly on the Millfield end of the site.• There is no mention of the preservation of mature trees although it is clear point within other consultations that have taken place. It has been reiterated many times by the Upper and Nether Poppleton Parish Councils and the Upper and Nether Poppleton Neighbourhood Plan.• There is clear support for the development to take place, with the proviso that the loss of playing fields should be replaced.• Green infrastructure (hedges trees and wild life areas) is to be preserved.• There are a number of water ponds which support aquatic life and a potential habitat for Crested Newts. It could provide an ideal open space recreational area.• With the increased housing in this area there is a suggestion of Primary and Nursery school facilities but no mention of increasing the size of the provision for Secondary and Tertiary Education.• This lack of provision will increase the need for transport and additional car journeys adding to the considerable congestion already on the

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				Boroughbridge Road.(Pollution on this road In the transport section and Environmental section)
ST2	SS7	44	Civil Service Site Cross reference with ENV 1	<p>This definition that follows was given to the Upper and Nether Poppleton Neighbourhood Plan when the 'made 'plan was agreed and supported by the City of York Council but in the policy stated in the current Local Plan it has been totally ignored.</p> <p>The site ST 2 was removed by the Inspector of the Upper and Nether Poppleton Neighbourhood Plan based on the City of York information that this was a Green Belt site from the reserved Regional Spatial Strategy RSS.</p> <p><i>The Green Belt designation of the Land by the reserved RSS</i></p> <p><i>YH9 C The detailed inner boundaries of the Green Belt around York should be defined in order to establish long term development limits that safeguard the special character and setting of the historic city</i></p> <p><i>Policy Y1 York Sub area policy</i></p> <p><i>Plans, strategies, investment decisions and programmes for York sub area should:</i></p> <p><i>C Environment</i></p> <p><i>1 The City of York LDF, defines the detailed boundaries of the outstanding sections of the outer boundary of the York Green Belt about 6 miles from York City centre and the inner boundary in line with policy YH9</i></p> <p><i>2 Protect and enhance the nationally significant historical and environmental character of York including its historic setting, views of the Minster and important open area"</i></p> <ul style="list-style-type: none">• The Paradox of the statement ' perception of openness' is a clear indication of Green Belt and that if development is considered the Green Belt would be sacrificed.• This is the last visible open space between the Villages of Upper and Nether Poppleton and the urban sprawl of York.• The views of the Minster are clear from the site and would be lost if building were to occur.

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				<ul style="list-style-type: none">• This is an important Open Area that should be reinstated as sports and leisure areas for the local schools and community.• There will be significant competition on the Boroughbridge Road if this development goes ahead as there will be in the region of 1500 homes and even with good public transport one must assume somewhere in the region of 1200 cars departing and arriving at this area.• There is no mention of this in the transport strategy.
ST19	SS23	73	Land at Northminster Business Park for expansion.	<ul style="list-style-type: none">• This development is the largest business park area outside the York Central development. It is on the same side of the City as ST2 .• The site which when considered with E 15 provides over 60,000sq m of B1a B1b and B 8 provision• This development together with 1500 houses on the same access road is not sustainable.• There is no recognition within the proposed policy for road infrastructure development.• The proposal to increase jobs by 850-3000 should be interpreted as 850-3000 cars daily plus delivery vehicles as the proposed site is to develop offices as well as manufacturing and development premises.• This proposed development also does not consider the daily traffic considerations of clients to the offices, business premises and other industrial units.• There is no recognition that the B 1224 with the current roundabout improvement provision in 2018 would provide a much needed alternative access to this site.• The current site is well managed but this expansion more than triples the current area and it cannot be assumed that the same restrictions will still apply.• There is no recognition that at present, this site is in lock down from 7pm to 7am so no night deliveries are possible.

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				<ul style="list-style-type: none">• It is anticipated that night deliveries will become the norm with this level of expansion and that it will disrupt and disturb those who currently live in the quiet rural country road.• There are within in York and the immediate surrounding area under occupied offices and business premises so is there a need for such expansion.• Office space at York Business Park less than 1 km distant is still under-occupied after 20 years of development in the area.• Offices are being converted into flats and hotel extensions in York and at Clifton Moor. If offices were required why are developers so anxious to recommission and change the purpose for which they were originally build?• The development of this as a business park could, if underutilised, become another housing estate such as Clifton Moor has become.• Reference to the Park and Ride is a total red herring- the area only operates till 7pm with no potential at present for overnight parking.• Reference to a railway station in Poppleton would require a 1.5mile walk to the proposed development and is also considered as deliberately misleading in the policy description.• The car parking facilities at the Poppleton Railway station are currently at capacity.• This should not proceed without a full habitat appraisal and land quality appraisal.• This should not proceed without a full historic and character setting appraisal.• This should not proceed without significant improvement by dual carriageway of A1237 in this area.• On the site at the present time there are 6 empty warehouse sites and 3 office sites• The present road system cannot cope with the quantity of traffic
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	EC1	74	Provision of Employment	Whilst it is appreciated that the Local Plan is a planning document to be read and interpreted by planners the reference to various land uses as B1c, B2, B8 and possibly an element of B1a in this policy is not explained anywhere within any of the many planning documents to be read in conjunction with this draft Local Plan. How can this be read in a public consultation without the relevant information?
	EC 1 cont. E 16	76	H16 Poppleton Garden Centre	<p>This site is part of policy EC 1.</p> <p>The following is confirmed by Nether Poppleton Parish Council, Upper Poppleton Parish Council and the Upper and Nether Poppleton Neighbourhood Plan:-</p> <ul style="list-style-type: none"> • The Parish Councils would confirm that the proposal to use the existing footprint of building only is supported, and that the garden centre adds to the Historic Character and Setting of the villages of Upper and Nether Poppleton. • The Parish Councils are encouraged that Historic England recognised that any other development of this area would lead to coalescence with the urban area of York and destruction of Green Belt. • The Parish Council would also reiterate that in the past the City of York Council Planning Department have opposed any development adjacent to this site as it is seen as being an important element of the Green Belt. It also highlights the importance of the historic setting and character of the villages. • Any change of use to housing during the lifetime of this Local Plan would be opposed as inappropriate and not supported by the NPPF. • The total area of proposed B1a, B1b, B8 in this immediate vicinity is over 60,000sq metres. Traffic of clients and employees and delivery cannot be accommodated on the current traffic infrastructure but no provision is made in the Transport Policies
	EC 2	78	Loss of Employment land	There is a lack vision and trend awareness within the policy documentation There is no recognition within this policy of the change of trends in shopping:- for example:-

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				<ul style="list-style-type: none">• The increasing use of on line shopping by the population for all manner of goods which has contributed to the demise of major retailers such as 'toys r us' and Maplin on Clifton Moor Out of town shopping precinct.• Tesco (Dobbie) decision not to develop at York Business Park as the model and methods of purchasing are changing.• This has not been recognised within this policy and no provision within the policy for on-line purchasing has been considered.
	EC3	79	Business and Industrial Uses within Residential Areas	<ul style="list-style-type: none">• The soundness of this policy is questioned as it does not recognise type of business that are incompatible with residential area.• York Business Park has 7 Car Sales areas all of which have high level security lighting right next to a residential care home for the elderly and Poppleton Park site of 200 homes. This causes conflict of interest with light and noise pollution.• By the nature of the car sale business the employees are not likely to walk or cycle to work. Many are given display vehicles to assist in car sales. This creates increased competition on the road at peak times.
ST27	H7	110	Student Housing	<p>This policy fails to reflect the changes in Government Policy regarding tuition fees.</p> <ul style="list-style-type: none">• It is difficult to see why student housing numbers are related to the overall housing need within the City of York.• Students traditionally occupy the accommodation for 40 weeks maximum of a 52 week year.• The numbers of students are alleged to be on the rise but current government policy on grants and loans and low employment of graduate is contradictory to this evidence.• Foreign students from EU may be discouraged from coming to UK on the evidence of Brexit.• No proper count of students, or student accommodation provided by the Universities and Colleges is written into any part of the Plan or Policies or available in the public domain.

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				<ul style="list-style-type: none"> • No estimate or accurate figure of student numbers currently occupying privately rented properties is in the public domain at this time . • It is not clear how the increased student accommodation will free up premises for other individuals or families to use.
	HW1	121	Protecting existing facilities	<p>This policy needs to show commitment by developers to local opinion on facilities. The lack of this provision makes the policy unsound.</p> <ul style="list-style-type: none"> • It is clear that in some areas existing facilities may be on land that could be used for other purposes. <p>The following provisos should be written into this policy:</p> <ul style="list-style-type: none"> • Local Communities must be informed of any changes that are proposed. • Local Communities should be given a minimum of a year to explore the opportunities for community use. • This particularly applies in rural areas where for example the post office, pub or church may no longer be used for the purpose intended. • Communities could feel that the loss of the facility would reduce the residential quality of the village and to replace it with housing or some other business might not be an appropriate option.
	HW 3	125	Built Sport Facilities	<p>This Policy is consistent with NPPF. It does however contradict development proposal on ST 2 which is the Former Civil Service Playing fields. There is no provision on this site for playing facilities.</p> <ul style="list-style-type: none"> • The comment that green space will be provided may for example ban playing with a football which has happened in other areas such as Haxby where open space was left on the housing site. (Near Usher Park Road) • Provision of good well-lit cycle paths to facilities is absent throughout York. • This policy does not provide for loss of playing fields attached to other premises. For example, the Former British Sugar site currently contains a cricket field. This will be absorbed into the Open Space but not replaced on site or within walking distance.
	G1 1	165	Green Infrastructure	<ul style="list-style-type: none"> • By removing the wording on the 2017 consultation to point (i) the removal of the designation of Site of Interest in Nature Conservation (SINC) will

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				allow York Business Park to develop on such areas leading to the loss of habitat, trees and shrubs and loss of open space.
	GI 2	166	Green Infrastructure	<ul style="list-style-type: none"> • The strengthening of the statement in GI 2 is supported. Potential developers in and around York should be made aware of their responsibilities to enhance Green Infrastructure, preserve Nature and the habitat for birds and insects by replanting hedgerows, trees and re-greening areas after development. • Some developers put the correct wording into their plans and then later apply for an alteration so that they do not need to comply. • This loophole in planning needs attention but is not recognised within the Local Plan
	GI3	168	Green Infrastructure	Green Corridors are supported through new proposed development on the Former British Sugar Site. This would be particularly useful if it were tied into cycle paths and pedestrian access to the City Centre. Linking between the Former British Sugar Site and the major development of the York Central should be encouraged.
	G 15	170	Protection of Playing Fields This is in direct conflict with ST 2	<p>This policy is supported particularly with reference to any development proposed on ST2 which is the former playing fields of the Civil Service.</p> <ul style="list-style-type: none"> • Support should be given to replacing the plan for housing development with playing field development due to loss of playing fields at the Former British Sugar Site, Lowfield School, the lack of Open Space and restricted space at Manor Academy. • While there is a desire to utilise Open space adjacent to Manor Academy it is also clear that Road development for the future would require the land adjacent to the A 1237. • The Civil Service Playing fields would be a good opportunity for community and school use to develop as playing fields. • The playing field name and boundary is clear on all maps produced at all stages of the consultation process.

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	GI6	171	New Open Spaces	There is approval for the change in wording to this policy. Provision for open space should not be left to the developer alone but in consultation with the local communities.
	GB1	175	Development in the Green Belt	<ul style="list-style-type: none"> • Lack of consideration of the wording of this policy is an invitation for unmanaged development • The additional statement added to this policy is ambiguous as to who decides 'what is an improvement to the openness of the Green Belt' and what is meant by this. • Settlement lines that have been agreed and reiterated in the various consultations have been left out of this policy. • The Settlement Line of Upper and Nether Poppleton in the 'made' Neighbourhood Plan p 16 is clearly defined – but not referred to in this policy.
	GB2	178	Development in the washed over Green Belt	<ul style="list-style-type: none"> • Villages where there are clear settlement lines that have been established should not have these lines altered. • Hedgerows which help as a visual aid to such boundaries should be afforded particular protection. • Desk research alone will not give the evidence. Google Earth is out of date and should be used only to compare and contrast the current and previous situation. • Mature trees that often indicate such boundary lines of settlements should be protected in the wording of this policy.
	GB3	179	Reuse of buildings	<ul style="list-style-type: none"> • Point vii of this policy is incorrect. The settlement limit should be the limit of extension. • The wording should reflect the need for consultation and consent before the settlement limit is ever altered. • This is also the case for GB 4 (iii) • There should be a clear policy related to redundant farm buildings as within villages they can provide historic evidence of the development of a settlement.

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				<ul style="list-style-type: none"> • Reuse should not be interpreted as redevelopment.
	GB 4	180	Exceptional sites	<ul style="list-style-type: none"> • Affordable housing should also be related to proximity to employment and public transport networks.
	T2	210	Transport	<ul style="list-style-type: none"> • The provision for expanding the Park and Ride at Poppleton Bar was built into the original application. • What has been omitted from the present iteration of the Local Plan is the cumulative effect of the proposed expansion of Northminster Business Park, the potential for change at Poppleton Garden Centre and the lack of sufficient road capacity to York Central. • A railway halt was proposed for York Business Park and Poppleton Park . Why has this been removed when it was a condition for the development of both sites when the developers applied for planning permission?
	T3	216	York Railway Station and Associated Operational Facilities	<ul style="list-style-type: none"> • The Local Plan consultation lacks an integrated transport strategy. • While this policy goes into great detail on the York Railway Station Site and the associated issues it fails to connect the ideas of all the Park and Ride Schemes situation around the city most of which pass directly past the station. • Currently no Park and Ride facility has the capacity to allow overnight accommodation of cars so daily use of Park and Ride connected to the Station is impossible. • During the next 20 years of this Local Plan it is important to consider how to reduce the vehicle congestion surrounding the Railway Station.
	T4	217	Transport	<ul style="list-style-type: none"> • Does improvement mean the introduction of traffic lights at peak periods? Currently the 'new roundabouts' block access for vehicles as there is no box junction when the traffic is heavy to allow any feed in from the left. This is particularly noticeable from York Business Park where the increase in car sale showrooms has increased the traffic in the area. • No mention of this being considered in the Local Plan.
	T5	221	Transport	<ul style="list-style-type: none"> • Cycle and pedestrian access is a common mantra in all large planning applications. This Local Plan fails to recognise that current cycle provision

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				<p>on the A 1237 between A59 and A 19 is totally inadequate when this section is a major route for children from Rawcliffe accessing Manor Academy.</p> <ul style="list-style-type: none">• Current shared cycle routes within Poppleton are inadequate to provide safe passage for cyclist and children at key times and no provision for this is mentioned within any policy.• While these comments relate to Poppleton it is also true of cycle access for children in and out of Haxby to the local Secondary School• Children cycling to many Secondary Schools within the city are forced into traffic because of car parking on the cycle tracks.• Provision should be made for a red route to prevent parking on cycle routes at school travelling times eg 8-9am and 3-4pm. There is no provision for such policy within the Local Plan.
	T6	223	Development at or Near Public Transport Corridors, Interchanges and Facilities	<p>The addition of this statement to the Transport Policy 6 is welcomed in the light of the proposed development at ST1 former British Sugar Site.</p> <p><i>"Where development is sited close to or is likely to have an impact on existing operational railway lines or lines that may be reopened no new crossings will be permitted. Furthermore, development proposals must demonstrate to the satisfaction of Network Rail that the safe use of affected level crossings as a result of development will not be compromised or that the impacts can be mitigated."</i></p>

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RECEIVED
22 MAY 2018
BY: _____

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

Name.
Address

Dear City of York Council,

I am writing to provide my feedback and outline my support for the Local Plan Publication Draft 2018.

As a resident of York, I believe it is essential that we submit a plan that directly addresses the local pressures in our housing market, but at the same time, guarantees the protection of the greenbelt and York's natural beauty.

Overall, I judge that the City of York: Local Plan Publication Draft, Policies Map, Sustainability Appraisal and Strategic Environmental Assessment to be 'sound' documents. However, more specifically, I feel the following principles within the current draft of the Local Plan are crucial for the future development of York:

- The plan gives good protection of York's Greenbelt, protecting our unique City.
- Given that population figures are predicted to be lower than estimated by the Government, the plan provides enough houses for the people of York
- From delivering roughly 500 houses per annum, to nearly 1000 house per annum, I believe that through the housing delivered under the plan, affordability will be improved in York

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

It is essential that the people of York retain control of this process and ultimately, decide on the future of York itself

Signature: 

Date: Ruby BURGESS

I accept the City of York local plan so long as it guarantees that any future building work takes place on brownfield sites only. I do not accept any proposals to build on greenbelt land.