



City of York Local Plan

Proposed Modifications and Evidence Base Consultation 2021

Representations received

Volume 9 of 11

Responses SID883 to 932

<b>SID Reference</b>	<b>Representation</b>
73	Peter Heptinstall
75	Heslington Parish Council
84	Tim Tozer
91	Westfield lodge and Yaldara Ltd
102	Elvington Parish Council
114	Ian Henderson
118	Historic England
119	Environment Agency
122	York Racecourse
127	Christopher Stapleton
141	Oakgate Group PLC
160	CPRE North Yorkshire (CPRENY)
181	Gateway Development
182	KCS Developments
191	Martin Moorhouse
192	Selby District Council
199	Mr Jolyon Harrison
215	Wilberforce Trust
217	Peter Moorhouse
220	Mr M Ibbotson
228	The Bull Commercial centre
231	Fulford Parish Council
238	Gillian Shaw

253	Bellway Homes
255	Home Builders Federation
257	Henry Boot Developments Limited
260	Lovell Developments (Yorkshire) Ltd
267	York Diocesan Board of Finance Limited & The York and Ainsty Hunt
269	Janet Hopton
288	Wigginton Parish Council
298	New Earswick Parish Council
304	Huntington and New Earswick Liberal Democrats
316	Dunnington Parish Council
329	Murton Parish Council
333	Alison Stead
338	Alan Cook
339	Barratt David Wilson Homes
342	Andy Bell
344	National Grid
345	Defence infrastructure Organisation
350	Picton
351	McArthur Glen
358	Mark Miller
359	NHS Property Services Ltd
361	Cllr Andy D'Agorne
364	York Labour Party
366	NHS Property Services
372	Gladman Homes
375	Wheldrake Parish Council
378	Langwith Development Partner
381	Yorkshire Wildlife Trust
383	Natural England
393	Cllr Nigel Ayre – Residents of Heworth Without
399	Cllr Anthony Fisher
407	Rob Littlewood
418	Chris Wedgewood
422	Peter and David Nicholson
582	Landowners of land west of ST8
583	Redrow Homes, GM Ward Trust, Mr K Hudson, Mrs C Bowes, Mr and Mrs J Curry and Mrs E Crocker
585	Taylor Wimpey UK
590	York and North Yorkshire Chamber of Commerce
594	TW Fields
601	Procter Family
603	The Retreat York
604	L&Q Estates
607	Taylor Wimpey UK
612	Joseph Rowntree Housing Trust
613	Askham Bryan College



620	Galtres Garden Village Development Company
625	Roy Brown
825	Cllr Mark Warters
826	Pilcher Homes
833	George Wright
841	Jennifer Hubbard
849	University of York
863	Mr R Arnold
866	Mulgrave Developments Ltd/ Mulgrave Properties Ltd
867	Yorvik Homes
872	Jeffrey Stern
876	Joanne Kinder
878	Sarah Mills
879	Pat Mills
883	St Peter's School
888	Geoff Beacon
891	Redrow Homes
901	York St John University
920	J Owen-Barnett
921	Pauline Ensor
922	Peter Rollings
923	York Consortium of Drainage Boards
924	Jacqueline Ridley
925	John Pilgrim
926	Amanda Garnett
927	Rufforth with Knapton Parish Council
928	S Walton
929	Neighbourhood Plan Committee
930	Mal Bruce
931	Linda Donnelly
932	Vistry Homes
933	Crossways Commercial estates Ltd
934	Mulgrave Properties Ltd
935	York Housing Association, karbon Homes Ltd & Karbon Developments Ltd
936	Countryside Properties PLC
937	Andrew Jackson
938	Elvington parish Council
939	Friends of Strensall
940	John Burley
941	Karen Marshall
942	Stuart Gunson
943	Haxby St Mary's Parochial Church Council
944	North lane Developments
946	Gemma Edwardson
947	Maureen Lyon
948	Persimmon

949	York and Scarborough Teaching Hospitals NHS Foundation Trust
950	Kyle & Upper Ouse Internal Drainage Board
951	Stephensons
952	North Yorkshire County Council
953	Mr Adrian Kelly
954	York Green Party
955	Jomast Developments
956	Peter Vernon
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 Consortium)
958	M Beresford
959	Clifton (without) Parish Council
960	Jane Granville
961	Mrs Carole Arnold

September 2021

**From:** [REDACTED]  
**Sent:** 06 July 2021 11:28  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 205562  
**Attachments:** St\_Peters\_School\_York\_Local\_Plan\_Reps\_COMPOSITE\_SUBMISSION.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Approach to defining Green Belt Addendum January 2021 (EX/CYC/59)

## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** No, I do not consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:**

**Please justify why you do not consider the document to be legally compliant:** We make no representation on this aspect

---

## Your comments: Duty to cooperate

**Do you consider the document to comply with the Duty to Cooperate?:** No, I do not consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:**

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:** We make no representations on this aspect

---

## Your comments: Whether the document is 'sound'

**Do you consider the document to be 'sound'?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Land south of the southern School buildings is unjustifiably proposed to be within green belt despite it serving no green belt purpose:-

- The land is not countryside. It is part of a busy and evolving campus of a large, successful school where buildings and sports facilities need to meet changing demands such as increased School role numbers, energy conservation standards and artificial sports pitches provision
- Green belt designation to check unrestricted sprawl is not relevant to this circumstance. The School's development is confined within its boundaries. The major flood bank to the south undoubtedly performs this function in this locality.
- Development on the School campus would not affect the setting and special character of the city. The river corridor to the south performs this function, particularly giving views towards the Minster. School development would be within its site confines and be of height and massing appropriate to its location. Draft policy ED6 and text supports school provision and expansion. NPPF para 85 requires Councils to cater for meeting identified requirements for sustainable development when defining boundaries to the green belt. There is no Council evidence base for the School's requirements so that the proposed green belt boundary is contrary to para 85. Our submission provides this evidence. The document does not pass any of the tests of soundness.

---

## Your comments: Necessary changes

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** The green belt boundary should be along the northern edge of the flood bank to the south the School southern buildings and between the sports pitches on the western edge. See plan E attached to the planning statement

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** This issue is of major importance to the future of a high standard and successful school which needs to be able to utilise its campus for educational purposes.

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

St\_Peters\_School\_York\_Local\_Plan\_Reps\_COMPOSITE\_SUBMISSION.pdf

---

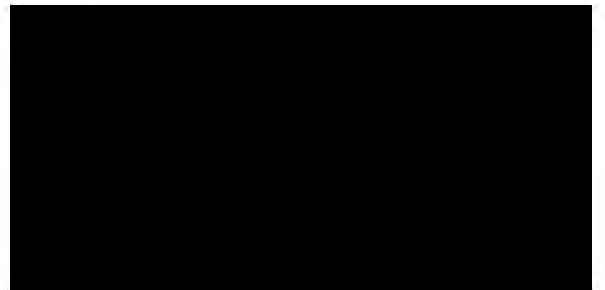
CITY OF YORK COUNCIL

EMERGING LOCAL PLAN  
REGULATION 19 CONSULTATION

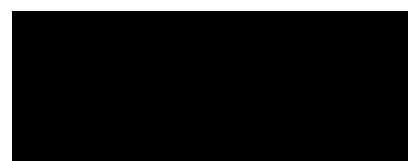
LOCAL PLAN MODIFICATIONS AND EVIDENCE  
BASE CONSULTATION

JULY 2021

Representations on behalf of  
St Peter's School, Clifton,  
York YO30 6AB



CITY OF YORK COUNCIL  
EMERGING LOCAL PLAN REGULATION 19 PUBLIC CONSULTATION  
LOCAL PLAN MODIFICATIONS AND EVIDENCE BASE JULY 2021  
REPRESENTATIONS ON BEHALF OF ST PETER'S SCHOOL YORK YO30 6AB



## EXECUTIVE SUMMARY

The Basis of The Representations: Soundness and Legal Compliance

## CONTENTS

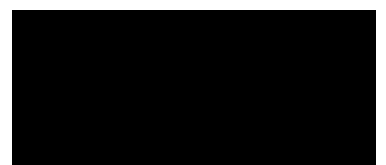
1. Introduction
2. The nature of educational campuses
3. St Peter's School
4. Planning policy context
5. Modifications proposed to Green Belt boundaries in emerging local plan
6. Detail of Council's Green Belt boundary proposals for St Peter's School
7. Proposed amendments to inner boundary Section 3 Boundaries 8 to 13
8. Conclusion

### Attachments:

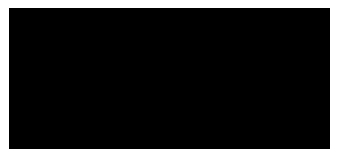
- A Modifications to Green Belt Boundary south of the School proposed June 2019 PM30
- B Modifications to Green Belt Boundary south of the School proposed April 2021 PM 75
- C Inner Boundary Section 3 in the vicinity of St Peter's, document EX/CYC/50 April 2021
- D Modifications to Green Belt Boundary south of Joseph Rowntree Secondary School proposed April 2021 PM 81

## APPENDICES

1. St Peter's School Site Development Justification: Director of Operations
2. St Peter's School 10 year Master Plan: Appraisal of school building stock and the need to replace and/or augment provision: McNeil, Beechey, O'Neill Architects







## EXECUTIVE SUMMARY

### The Basis of The Representations: Soundness and Legal Compliance

- I. These representations conclude that:
  - The Emerging Local Plan is unsound in relation the inner green belt boundary proposed around existing school buildings on the southern side of the campus of St Peter's School, York.

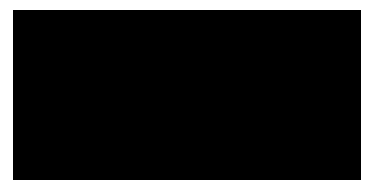
Changes required are to:

- Use as the green belt boundary, the obvious and well defined boundary provided by the large 4m high flood defence barrier which runs south-east to north-west, south of the built campus but bisects the western sports pitches.

See plan 6 attached.

Key diagram EX/CYC/46 is therefore unsound in this respect.

- On the matter of Legal Compliance, we make no representations on this aspect.
  - On the matter of Duty to Co-operate, we make no representations on this aspect.
- II. The proposed green belt boundary around St Peter's School southern campus does not correctly interpret and apply the requirements of NPPF 2012 para 85 in that the City Council has:-
    - Not ensured consistency with the Local Plan strategy for meeting identified and known requirements for sustainable development
    - Not satisfied themselves that the Green Belt boundary will not need to be altered at the end of the development plan period
    - Not defined boundaries clearly, using physical features that are readily recognisable and likely to be permanent and



- Included land which is not necessary to keep permanently open

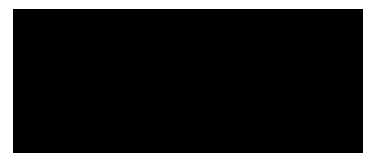
III. These representations are made in relation to Local Plan documents EX/CYC/59, EX/CYC/59c, EX/CYC/59h and EX/CYC/46. They concern the flawed justification for the inner boundary of the green belt proposed by the Council for two obvious matters which undermine the soundness of the plan unless rectified: -

- A. The Council has disregarded its obligation to make an evidence based assessment for meeting identified requirements for sustainable development for the School within the plan period, prior to proposing inner boundaries to the green belt. Its draft policies support educational institutions at each age level in Section 7 of the Submission Local Plan, and its statement in para 7.1 says:

*“Building on recent years’ investment in the city’s education 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”*

The School is certainly an exceptionally strong educational facility and is going from strength to strength. Despite this, the development requirements of the School have not been sought by the Council. Nonetheless, they are contained in this evidence.

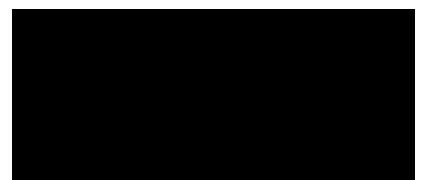
- B. The Council’s proposed green belt boundary hugs the southern edge of the buildings in the lower campus, around buildings and voids between buildings, like a doily. This is despite the fact that many of the buildings are inefficient and no longer fit for purpose and the likely replacements are unlikely to be in the exact same position due to the need for the school to function throughout building projects, thus replacements will need to be on an alternative site within the campus.



A green belt boundary is required to use physical features that are readily recognisable and likely to be permanent, the current proposal demonstrably fails to achieve this. Instead, a strong and recognisable boundary is presented by the adjacent 4m high flood prevention barrier which is definitely permanent and meets the requirements for designating green belt boundaries.

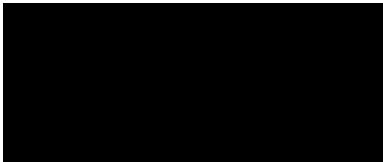
- IV. For the School, Document EX/CYC/59c INNER BOUNDARY SECTION 3, boundaries 8 to 12 are proposed, (attached plan C). Modification PM75 is relevant (attached plan B. This plan also shows the previous boundary proposed by the Council in June 2019 which excluded hard surface pitches from the green belt. No logical reason has even been provided by the Council for its change of position since 2019.
- V. In terms of the purposes of green belt, the campus is patently not countryside, it is a busy institution with over 1200 students and buildings and sports pitches to serve the School community. It is an active business and, in common with other such educational institutions, it needs to use its site for the benefit of the School.

Due to the significant impact of the flood prevention barrier, it serves the purpose of preventing intrusion into countryside effectively. The School grounds are not intended for this purpose, and do not need to be. The river corridor protects the character of the historic city which 1960s former Council buildings on the lower campus are not able to do.

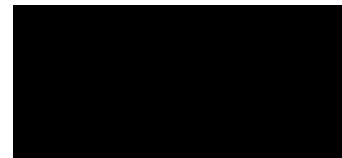
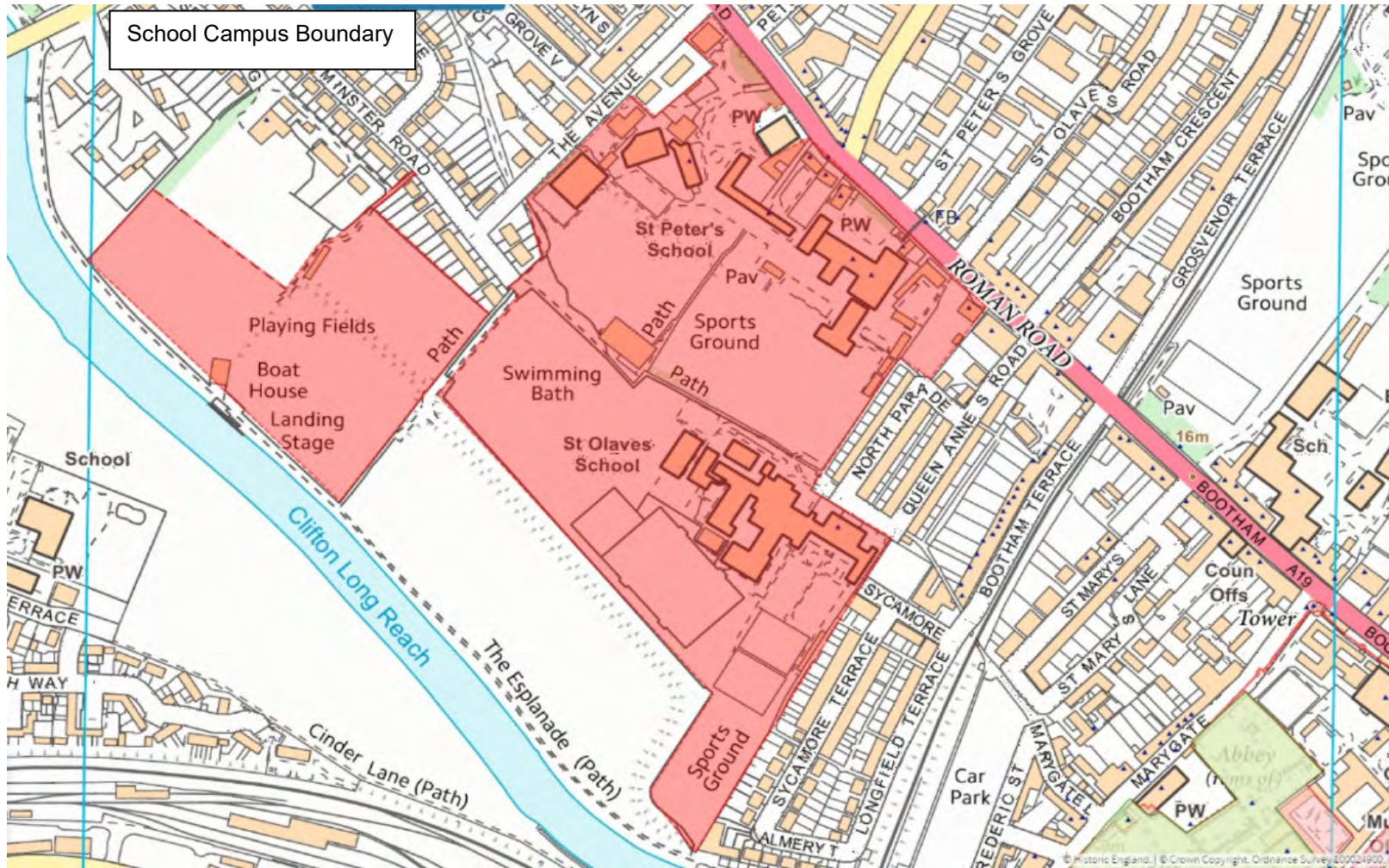




School Campus Boundary -Satellite View







## 1. THE BASIS OF THE REPRESENTATIONS

1.1 These representations are made in relation to Local Plan documents EX/CYC/59, EX/CYC/59c, EX/CYC/59h and EX/CYC/46. They concern the proposed modification of the proposed inner boundary Green Belt within the campus of St Peter's School, Clifton, York YO30 6AB. The Council's latest proposed modification PM75 is contained within attachment B at the end of this statement. The proposed Green Belt boundary encloses the built footprint of the southern school buildings in an illogical 'doily effect'.

1.2 Our assertion is that the boundary does not correctly interpret the requirements of NPPF 2012 para 85 in that the City Council has:-

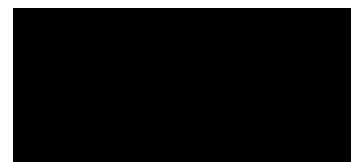
- Not ensured consistency with the Local Plan strategy for meeting identified requirements for sustainable development
- Included land which it is unnecessary to keep permanently open
- Not satisfied themselves that the Green Belt boundary will not need to be altered at the end of the development plan period and
- Not defined boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

## 2. THE NATURE OF EDUCATIONAL CAMPUSES

2.1 A school, in line with further and higher education institutions, is not a static entity. Its activities and its estate evolve over the years and decades from aspects such as:

- Increased demand for school places requiring increased capacity
- Requirements of the changing curriculum
- Buildings have become no longer fit for purpose from physical condition, capacity, location etc
- Running costs: energy efficiency, availability of natural lighting, natural ventilation, insulation etc

2.2 A school therefore needs space to meet the changing demands on its estate. To replace a building requires decant space such as a site for the new building and later demolition of that being replaced. New capacity needs space to locate a building. Any new

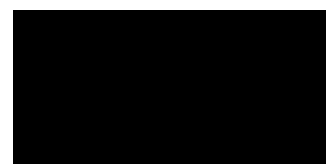


development needs wide clearances around the construction site to allow the school to function safely during the construction period. The construction site needs a contractors' compound and storage area.

- 2.3 For all of these reasons a school needs space. To remove part of its existing site and place it into Green Belt inhibits its abilities to meet its needs for sustainable development. This is particularly inequitable as other city schools in urban locations have no such constraints.

### 3. ST PETER'S SCHOOL

- 3.1 St Peter's is a co-educational independent school with a very long history, it is the oldest school in England outside of Kent. It comprises three elements, the senior, preparatory and pre-preparatory sections which are all on one campus. The 17.4ha site is located on the northern bank of the River Ouse, with a high flood bank running east-west to the south of the campus. The site is sub-divided by an east-west public right of way with the senior school, St Peter's, and pre-preparatory school, Clifton, to the north and the preparatory, St Olave's school to the south. A range of sports pitches lay in the northern section, and on the south and west sides of the southern section. The School caters for over 1200 day and boarding students; 48% currently have a home address within the City Council boundary and 91% have a home address within 25 km of the site. It is therefore an important educational facility for a significant number of families within the administrative area of the City.
- 3.2 The School is extremely popular and over-subscribed. It offers a wide curriculum and many out of classroom activities. It is also involved in the local community such as the Minster choir being based at the School, and sports activities off site. It joins a group of high quality schools in the city that contribute to the Council's objective of creating world class education in the city. The strong sports ethic results in the pitches being heavily used and as such artificial pitches are valuable such that there is an aspiration to construct additional facilities.
- 3.3 The built heritage of the School means that conserving listed buildings is part of its role in retaining the character of the historic city. When the St Peter's took over the redundant former Council owned Queen Anne's Girls Grammar School, it inherited the





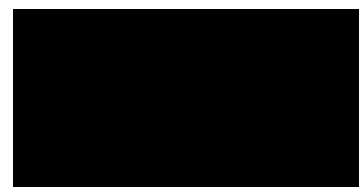
listed Brierley building which was the original school building which is grade II listed. At the time the City Council was marketing the school for redevelopment, but St Peter's acquisition of it ensured that it remained in education use, thereby facilitating its original use. This has given the building a new occupier for the use for which it was designed, and which would otherwise have been lost.

- 3.4 Appendix 1 provides an overview by the School of its history, character and strategic vision. Its vision is directed towards improving the built and sports facilities so that they match up to changing requirements of the curriculum, the needs of the student community and to meet new agendas such as energy efficiency and sustainability.
- 3.5 Appendix 2 provides information on the nature and condition of St Peter's estate, identifying constraints. The senior school is located within the Clifton conservation area and a significant proportion of the buildings are listed, so that the historic context inhibits the ability to make changes to the estate, (Appendix 2 plan 2). The preparatory school was built as Queen Anne Girls Grammar School but declared redundant and purchased by St Peter's in 2001. It has a single listed building but the majority of its buildings are not of high quality and do not meet current standards of energy efficiency or space efficiency. (Appendix 2 plans 3 and 4.)
- 3.6 The appendix sets out a high-level master plan to carry out necessary improvements and additions to meet the challenges that the School faces.

#### 4. PLANNING POLICY CONTEXT

- 4.1 The emerging Local Plan Submission Version May 2018 addresses education in Section 7. It states at para 7.1:

*"Building on recent years' investment in the city's education 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."*



## 4.2 Policy ED6 states:

*“The provision of sufficient modern education facilities for the delivery of pre-school, primary and secondary school education to meet an identified need and address deficiencies in existing facilities will be facilitated. New and enhanced education facilities will be permitted if they:*

- i. Are in locations that are accessible by sustainable means of transport from the communities they are intending to serve and not have a significant adverse impact on the amenities of neighbouring property;*
- ii. Have sufficient and appropriate playing field provision or take opportunities to deliver additional playing fields for existing schools identified as having a deficiency, as part of new development immediately adjacent to or near the schools; and*
- iii. Provide community access, through good design and modifications, to their facilities in areas where there are deficiencies of community leisure and sports facilities.”*

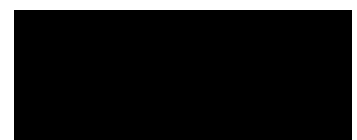
## 4.3 Para 7.19 states:

*“Providing sufficient and suitably modern accommodation will help to increase educational attainment to equip communities and local people with the right skills for the jobs available, both now and in the future. As such proposals for additional educational facilities will be welcomed by the Council if requirements are identified following assessment of need, and for academies and maintained schools if their development reflects the aspirations of local communities.”*

## 4.4 The policy guidance in the NPPF supports school provision. It states at Para 72, in the section on Promoting Healthy Communities:

*“The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive approach to meeting this requirement, and to development that will widen choice in education. They should:*

- give great weight to the need to create, expand or alter schools; and*



- *work with school promoters to identify and resolve key planning issues before applications are submitted.”*

## 5. MODIFICATIONS PROPOSED TO GREEN BELT BOUNDARIES

- 5.1 The topic paper TP1 is titled Approach to defining York's Green Belt ADDENDUM January 2021 (EX/CYC/59). Section 4 addressed the local plan strategy and development needs, in compliance with NPPF 2012 para 85 which requires local councils to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development. Paras. 4.47–4.50 (page 21) addresses the need of development related to education. However, this is a high level assessment of the need deals solely with additional pupil places and does not refer to existing schools' need to update or expand their estate.
- 5.2 Section 7: Methodology: Channelling Development to Urban Areas is again high level related to educational provision, Paras. 7.22-7.24, (page 57). Section 10: Enduring Boundaries and Safeguarding addressed educational provision again at high level in Paras. 10.24 and 10.25.
- 5.3 Thus, despite a silence in the modified documents subject to this public consultation on the requirements of existing schools to be able to expand and remodel as their needs define, and despite policy ED6 supporting the needs of schools to carry out developments, the Council is proposing exceptionally tight Green Belt boundaries around existing school buildings where schools are co-located with the general extent of the Green Belt. Other schools with an urban location have no such constraints on their scope to carry out developments.
- 5.4 The secondary schools which are also affected by this unjustified at Joseph Rowntree and St Peter's, primary schools so affected are Burton Stone, Elvington, Heslington, Poppleton, St Barnabas and Stockton-on-Forest out of a total of 67 schools, including 5 independent schools, plus York College, a VI Form and Further Education College. Local plan modification proposals for Joseph Rowntree School and St Peter's are included in attachments D and B at the end of this statement.

## 6. DETAIL OF GREEN BELT BOUNDARY PROPOSALS FOR ST PETER'S SCHOOL



6.1 The emerging local plan has in all versions shown the whole of the northern part of the school site allocated yellow for education, including the pitches. For the southern part of the school site, the proposed designations have been altered several times.

- In the publication version June 2018 the Green Belt bounded the buildings and a section of the sports grounds south to the flood bank. The pitches on the eastern boundary and those to the north-west were shown as existing open space within the Green Belt, (PM 30, attachment A). The justification was:

*“to represent completed planning permissions. Although the changes to the layout of the sports provision at St Peter's School are deemed appropriate uses within the Green Belt they may have an urbanising influence on the area which needs to be reflected.”*

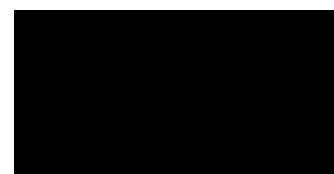
- This was modified in the Proposed Modifications June 2019 PM30 to utilise part of the flood bank as a southern Green Belt boundary so that the all weather pitch and tennis courts were included in the education allocation. The schedule stated:

*“Although the changes to the layout of the sports pitches at St Peter's School are deemed appropriate uses within the Green Belt they may have an urbanising influence in the area which needs to be reflected.”* (page 32) (attachment A).

- The current Proposed Modifications April 2021 PM75 shows the proposed Green Belt boundary now tightly enclosing the school buildings so that no open land is excluded from Green Belt. The sports pitches are shown as existing open space within Green Belt, (page 49) (Attachment B).

6.2 Document EX/CYC/59c Topic Paper 1 Green Belt Addendum January 2021 Annex 3 Inner Boundary Part 1 Sections 1-4 considers St Peter's School in Section 3 Boundary 8 to 13. This is shown on Inner Boundary Section 3 plan (attachment C), and in detail in the schedule pages 199 to 240. The justification for the tight Green Belt enclosure of the southern school buildings is given as:

- Purpose 4 Preserving the setting and special character of historic towns
- Purpose 1 Checking unrestricted sprawl
- Purpose 3 Safeguarding the countryside from encroachment



## 7. ASSESSMENT GREEN BELT PURPOSES

### 7.1 Purpose 3

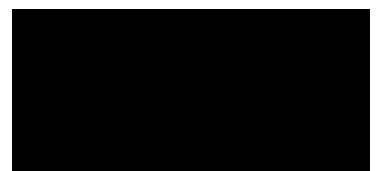
The basic premise of the Council's case is that the playing fields on the southern side of the school campus are part of the "countryside". This is plainly wrong to even the most cursory visitor. To the contrary, this is an active, busy school campus with facilities for its 1217 students. With the School's reputation on sports achievements their facilities are well used. This requires lighting to be installed on the all-weather pitch and a second illuminated pitch providing. Illuminated pitches are considered an urbanising feature and not appropriate in Green Belt.

### 7.2 Purpose 1

Educational development on an existing school site cannot be rationally considered as threatening "unrestricted urban sprawl". This is a defined site with a specific use. In addition, there is a circa 4m high flood bank to the south of the school campus, which is circa 15m wide at its base. It is difficult to imagine a more dominant and permanent Green Belt boundary, in contrast to the weak and illogical boundary proposed by the Council.

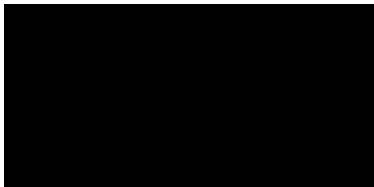
### 7.3 Purpose 4

Preserving the setting and special character of historic towns is acknowledged as a strong factor in defining the inner boundaries of the city's Green Belt. However, the River Ouse corridor to the south of the flood bank fulfils this function in a powerful way. Views into the city centre from the river corridor are uninterrupted by the southern part of the School campus. Changes to the campus would be "behind" the flood bank and would be seen, if at all, against the setting of the raising ground up to the listed buildings on the norther edge of the site. They would be of low impact not damaging the setting and special character of the city.



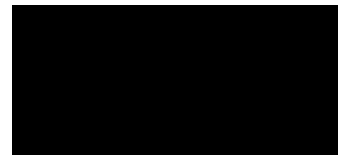


Photography Viewpoints



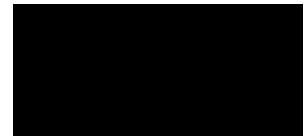


Photograph 1



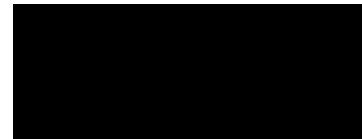


Photograph 2



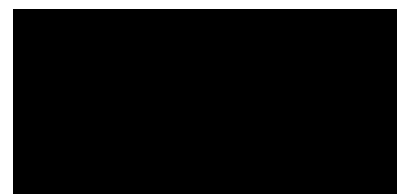


Photograph 3



7.4 Para 85 of the NPPF 2012 advises on the defining of Green Belt boundaries. This advice is not followed in the definition of a proposed boundary around the School.

- **Ensuring consistency with the Local Plan strategy:** The proposed boundary is drawn tightly around the southern campus' building footprint, removing development potential, even for additional all weather pitches with lighting. This has taken no account of the legitimate and known needs of the School to replace and augment their current built estate nor the need for decant space to develop additional floorspace yet keep the School operational throughout. The Local Plan policy ED6 supports new and enhanced educational facilities so that there is inconsistency with the Local Plan strategy.
- **Ensure permanence in the boundaries proposed:** The Council's boundary modifications have proposed a 2-tier approach to school campuses in that those adjacent to the Green Belt are proposed to have their undeveloped campus space washed over by Green Belt, whilst schools wholly within the urban area have their whole campus allocated for educational use. This is inconsistent given that all schools should have the same acknowledgement of their need to replace and/or augment their building provision over time. The proposed Green Belt boundary unreasonably inhibits the scope of these Green Belt schools to cater for legitimate growth and enhancement, thus pressure to revise the Green Belt boundaries to allow such growth will become immediate. For reasons set out in the appendices to this statement – the need for such development is known and undisposed, which renders the approach of the Council unsound and unjustified. This threatens the permanence of the boundaries.
- **Define boundaries clearly using physical features that are readily recognisable and likely to be permanent:** The eastern section of the southern boundary of St Peter's estate runs along the northern edge of the Lower Bootham flood defences. This flood bank has been recently raised and is now 4m high and 15m wide at its base. This is an exceptionally strong physical feature that is readily recognisable and very likely to be permanent. In contrast, the 'doily effect' of the Council's proposed boundary around the current building footprint is not permanent since buildings can be extended or demolished and replaced over the plan period. The amendments to Part 7 class M of the GPDO (2015) which



came into force on 21 April 2021 is a case in point since it allows for extensions etc to schools by up to 25% of their April 2021 footprint without planning permission provided that the works are not located on playing fields.

- **Not include any land which is unnecessary to keep permanently open:** The dominating flood bank obstructs views into the southern part of the St Peter's campus so visually severing it from the river corridor and public open space to the south, which are clearly defined. In this circumstance, there can be no justification to include the school's land north of the bank in the Green Belt.

7.5 The Council asserts that the southern campus fulfils three purposes of Green Belt, namely:

- o To check the unrestricted sprawl of large built-up areas
- o To assist in safeguarding the countryside from encroachment
- o To preserve the setting and special character of historic towns

In reality, the land fulfils none of these purposes and therefore there is no justification to place the School's southern area within the green belt in order to ensure that the land remains 'permanently open'. To the contrary the flood bank is the appropriate barrier. The western sports pitches to the south of the flood bank are accepted to be included within the Green Belt since they are viewed together with the land adjacent to the river.

## 8. INNER BOUNDARY SECTION 3 BOUNDARIES 8-13 PROPOSED AMENDMENT

8.1 The logical location for the Green Belt boundary north of the River Ouse is the massive flood bank which is dominant and permanent. It is shown on plan E attached and plan 6 in Appendix 2. The boundary would run from the western end of Almerly Terrace north-westwards. It would run between the western School playing fields until it reaches the rear of properties on the Government House Road, then run south to the river footpath.

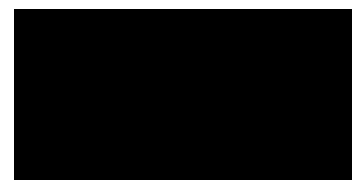
[REDACTED]

[REDACTED]

[REDACTED]

## ATTACHMENTS

- A CYC Modifications to Green Belt Boundary south of the School June 2019 PM30
- B CYC Modifications to Green Belt Boundary south of the School April 2021 PM 75
- C Inner Boundary Section 3 in document EX/CYC/50
- D Modifications to Green Belt Boundary east of Joseph Rowntree Secondary School April 2021 PM
- E Green Belt boundary proposed by St Peter's School





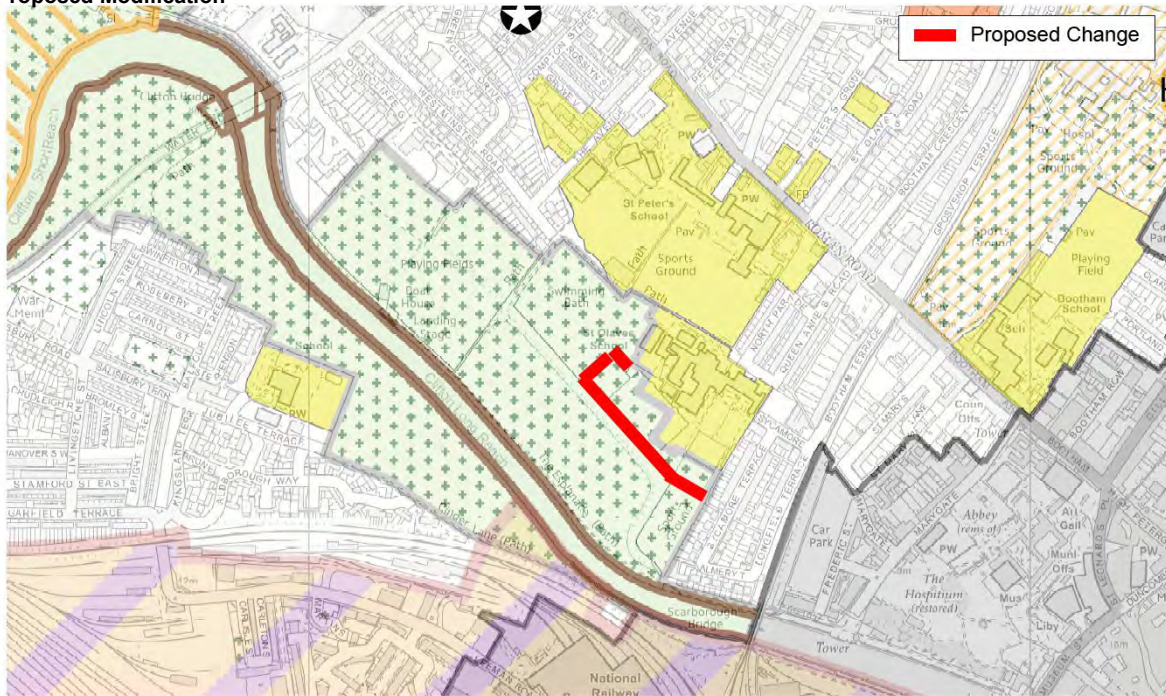
ATTACHMENT A

City of York Local Plan Proposed Modifications (June 2019)

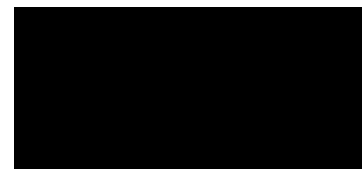
PM30: Rear of St Olaves and St Peters School Policies map boundary (2018)



Proposed Modification



See key on page 55



















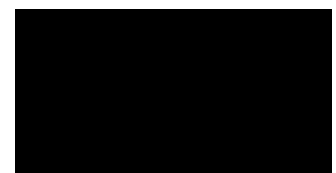


City of York Local Plan Proposed Modifications (June 2019)

Local Plan Publication Draft Policies Map February 2018 Key

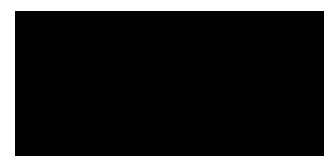
Key to Proposals Map	
	City of York Boundary
	City Centre Boundary - See Separate Inset Map
Spatial Strategy	
	Indicative Strategic Site Access
Economy and Retail (Section 4)	
	District Retail Centre
	Strategic Employment
	General Employment
	Mixed Use
Housing (Section 5)	
	Strategic Housing
	General 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



City of York Local Plan Proposed Modifications (June 2019)


Modification Reference Number	Plan Location	Proposed Modification	Reason for Changes
<b>PM29 -</b> Policies Map Green Belt Change – Moor Lane, Woodthorpe	Policies Map South –  (See map extract on page 56 of this document)	Proposed detailed inner Green Belt boundary modification – it is proposed that the boundary should follow the carriageway to the south of Moor Lane, as opposed to the north side of the road, as it is presented on the submitted policies map.	Consistency:  The methodology indicates that where the metalled surfaces of roads are in proximity to urban uses they should be considered to form part of the built up area.  See justification as set out in TP1 – Annex 3, Inner Boundary Section 1 Boundary 2.
<b>PM30 -</b> Policies Map Green Belt Change – rear of St Olaves and St Peters School.	Policies Map North –  (See map extract on page 57 of this document)	Proposed detailed inner Green Belt boundary modification – it is proposed that the boundary should follow the existing built sports provision in preference to the current line which no longer matches physical features on the ground.	To represent changes since the boundary was drafted and to reflect completed planning permission.  Although the changes to the layout of the sports provision at St Peters School are deemed appropriate uses within the Green Belt they may have an urbanising influence on the area which needs to be reflected.
Modification Reference Number	Plan Location	Proposed Modification	Reason for Changes
			The proposed line offers a more robust boundary to the Green Belt in this location with a greater degree of permanence being offered. The line currently presented on the policies map no longer relates to any physical structures.  See justification as set out in TP1 Addendum – Annex 3, Inner Boundary Section 3 Boundary 9,

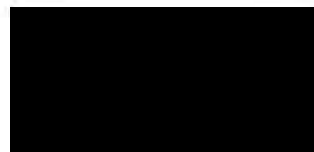




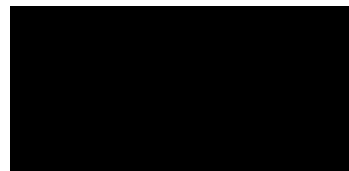
ATTACHMENT B

City of York Local Plan Proposed Modifications (April 2021)

Modification Ref: PM 75	Proposed Detailed Inner Green Belt Boundary Modification		
	Document location	Name of Area of Change	Evidence base location
	Policies Map North	PM75 St Peters School	TP1 Addendum Annex 3 Section 3 Boundary 9
<b>Proposed Modification</b>			<b>Reason: Consistency with the Green Belt methodology .</b>
			
<p>Reproduced from the Ordnance Survey mapping with the permission of Her Majesty's Stationery Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. City of York Council. Licence No. 1000 20818</p>			
<p>It is proposed that the green belt boundary should follow the built edge of the school buildings</p>			







Key to Policies Map extracts


**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
-  Nationally Significant Nature Conservation Sites  
(SAC/SPA/RAMSAR/SSSI)
-  Site of Importance to Nature Conservation  
(SINC)
-  Candidate Site of Importance to Nature Conservation  
(Candidate SINC)
-  Local Nature Reserve (LNR)







**Managing Appropriate Development in the Green Belt (Section 10)**

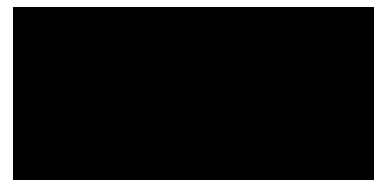
-  Greenbelt

**Waste and Minerals (Section 13)**

-  Household Waste and Recycling Sites

**Transport and Communication (Section 14)**

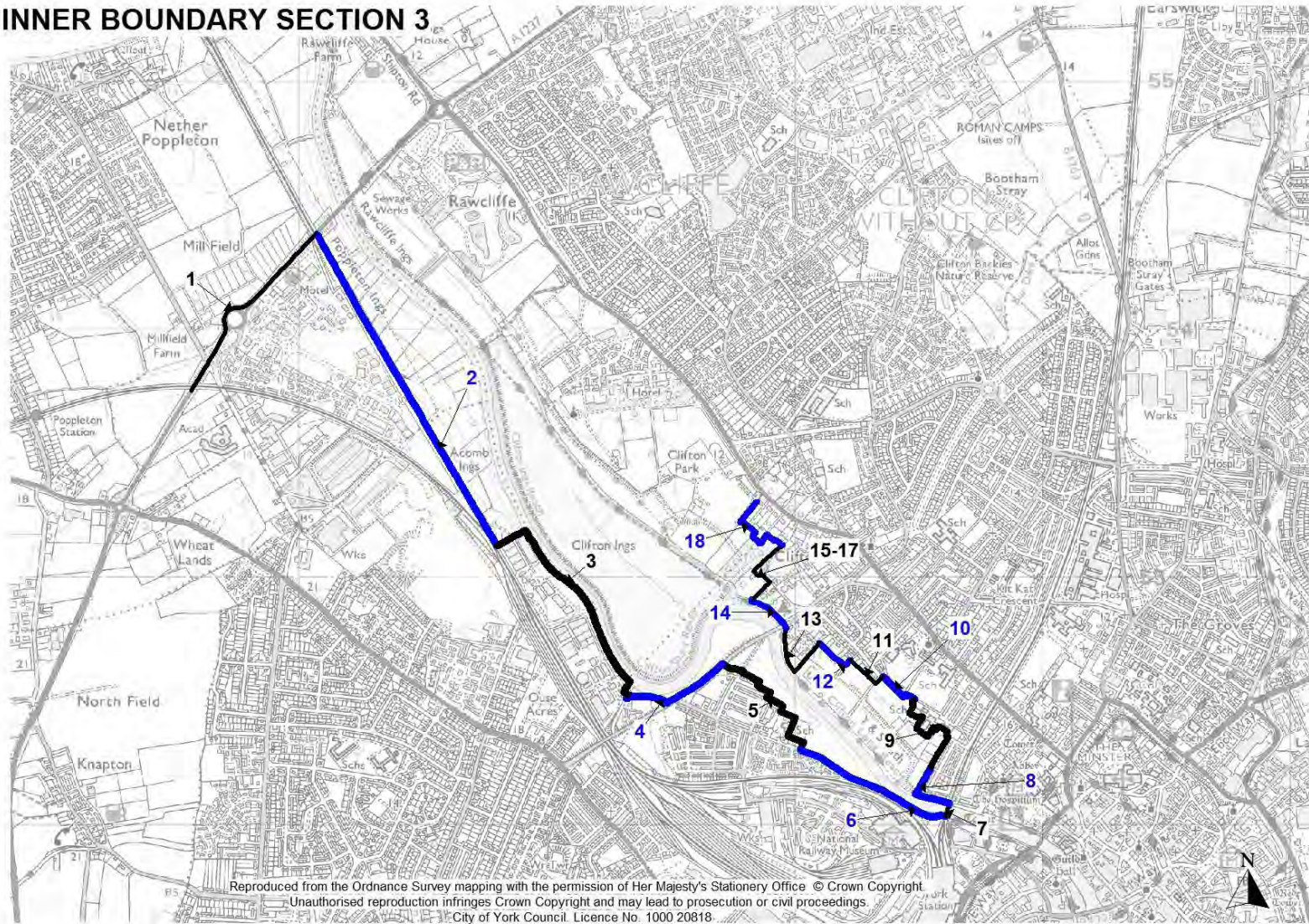
-  Proposed New Railway Stations
-  Existing Park and Ride
-  Existing Park and Ride with Potential for Relocation
-  Existing Park and Ride with Potential for Expansion
-  Potential New Bridge/Enhancement
-  Proposed Roundabout Junction Improvements
-  Proposed Strategic Junction Improvements
-  Land Safeguarded for Potential Future Transport Schemes
-  Strategic Pedestrian/Cycle Corridor Improvements





ATTACHMENT C

**INNER BOUNDARY SECTION 3**



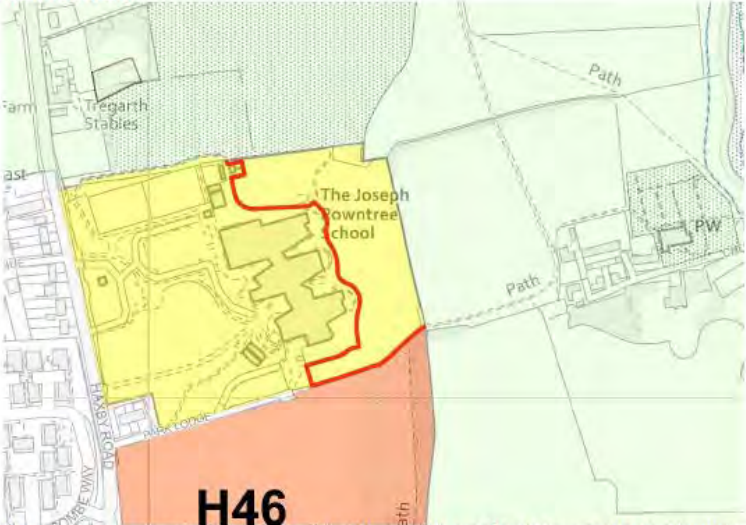
Reproduced from the Ordnance Survey mapping with the permission of Her Majesty's Stationery Office © Crown Copyright  
Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.  
City of York Council. Licence No. 1000 20818.

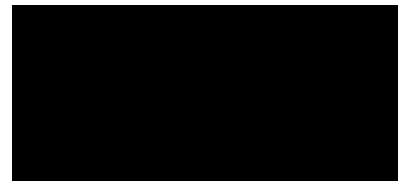




ATTACHMENT D

**City of York Local Plan Proposed Modifications (April 2021)**

Modification Ref: PM 81	Proposed Detailed Inner Green Belt Boundary Modification		Evidence base location
	Document location	Name of Area of Change	
	Policies Map North	PM81 Joseph Rowntree School	TP1 Addendum Annex 3 Section 5 Boundary 9
<p><b>Proposed Modification</b></p>  <p>Reproduced from the Ordnance Survey mapping with the permission of Her Majesty's Stationery Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. City of York Council. Licence No. 1000 20818</p>			<p><b>Reason: Consistency with the Green Belt methodology</b></p>
<p>It is proposed that the green belt boundary should follow the built edge of the School</p>			

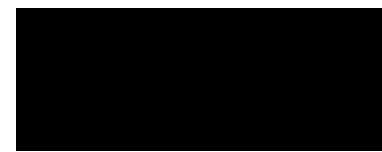


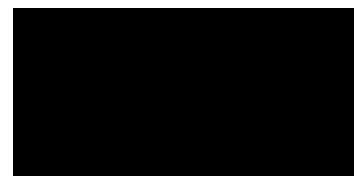


Proposed Boundary of Green Belt

Scale: 1" = 100'

DATE	11/10/11
PROJECT	St Peter's School, York
CLIENT	St Peter's School, York
PROJECT NO.	Master Plan
ISSUE NO.	Proposed Greenbelt Boundary
DATE	11/10/11
BY	SP06 + 006 + 1 + 0
CHECKED BY	
DATE	
SCALE	1" = 100'









# St Peter's School YORK

## **The Development of the School Estate to Meeting Educational Objectives**



May 2021

## Contents

<b>A</b>	<b>Introduction</b>	<b>3</b>
	Site History	4
	Numerical Growth	5
<b>B</b>	<b>Strategic Vision</b>	<b>5</b>
<b>C</b>	<b>Challenges and Constraints of the Physical Estate</b>	<b>6</b>
	Listed Buildings	6
	Legacy Buildings	7
	Large Indoor Spaces	8
	Physical Relationship and Relative Location of Buildings	8
	Duplication and Consolidation	9
	Compact Site	9
<b>D</b>	<b>Conclusion</b>	<b>10</b>





## A. Introduction

01. Founded in 627AD in the same year as York Minster, St Peter's School is the oldest school in England outside Kent and the fourth oldest school in the world. Today, the school is a leading independent co-educational day and boarding school for boys and girls aged 2-18. Our shared foundation and close connection with York Minster was strengthened in 2020 when we became their choir school.
02. The 19 hectare school estate is located in Clifton to the north-west of the city. The three schools that now form St Peter's are located on the site, St Peter's 13-18, and St Peter's 2-8 (formerly Clifton School) on the northern side and St Peter's 8-13 (formerly St Olave's School) on the southern side adjacent the river.
03. The School's vision is to prepare pupils for confident, successful and fulfilled adult lives and to have a positive impact on their world. St Peter's School, York is The Sunday Times North Independent Secondary School of the Year 2019. St Peter's School was also named Prep School of the Year and Independent School of the Year at the TES Independent School Awards 2021. The School is consistently oversubscribed and, in the future, would like to be able to accommodate more children who can benefit from all St Peter's has to offer.
04. St Peter's is renowned for academic excellence, with an 85% A\*- B pass rate at A-level and a 92% 9 – 5 pass rate at GCSE in 2019. The School is also renowned for the co-curricular opportunities for all ages and levels, with over 80 different activities available for pupils to enjoy.
05. Music is a particular focus for pupils at St Peter's. As well as the York Minster choristers, we have ensembles, choirs and individual lessons taking place throughout the school. In 2019 our senior Chapel Choir made it to the final of the National Choral Competition at the Royal Festival Hall. Drama is also a popular activity ranging from individual LAMDA classes, to small studio productions and to whole school productions with a cast and crew of hundreds and our assembly halls transformed into fully operational theatres.
06. St Peter's is well known for its achievements in sport, from beginners to elite levels. Our teams have made national finals in all sports, most notably our girls' hockey team who participated in the finals of the national schools' tournament and our rugby team who won the Rosslyn Park Sevens. Sporting talent at St Peter's is home grown and success comes from wide participation in team sports and a dedicated coaching team.
07. Our Help With Fees programme creates opportunities for those who could not otherwise afford an independent school education to join our community and are working with City of York Council to extend our provision to more children in the city. We are represented on the York Early Years Partnership and host an annual Learning Conference for teachers across the region. Staff are engaged in links with local schools, including governance positions and outreach initiatives.

08. St Peter's is a member of the York Independent State School Partnership and works in partnership with the Royal National Children's Springboard Foundation. We share our campus and facilities with community groups such as York City Baths Club, York Hockey Club, Vineyard and Christ the Light Churches, York Musical Society, YEDFAS, MENCAP, and even Glaisdale Hunt Pony Club, to name a few. We also host regular lectures which are available free of charge to the public and provide venues for organisations such as the York Literature Festival, the York Festival of Ideas and the Institute of Physics to host lectures and talks.
09. The Independent Schools Council Economic Impact Report (October 2018) calculated that the school made an annual contribution of £15.7m to the local economy.

### Site History

10. Though founded in 627, the school has been on its current site since 1844. St Olave's School, founded in 1876, joined St Peter's in 1901 and moved from its home in Bootham on to the main school site in 1934. Clifton School joined the St Peter's family in 1994, located on The Avenue across the road from the current school site.



*York Proprietary School 1838-1844*

11. In 2001, the former Queen Anne Girls' Grammar School, which had been operated by the City Council came onto the market. At the time it was being proposed by the Council for redevelopment, however it provided an ideal opportunity for St Peter's to expand its estate, which at the time was highly constrained. Following a successful bid, St Olave's School moved into the majority of the former Grammar School, with St Peter's senior school spreading out and occupying the 3 storey "C Block". Clifton School relocated into the Chilman building which had been purpose built for St Olave's in 1989, and the land on the other side of The Avenue sold to facilitate the purchase of Queen Anne's.



*St Peter's 2-8 in the North West of the campus*

12. The current school is centred on three separate areas of the campus. St Peter's 13-18 on the historic northern part of the campus, St Peter's 2-8 (Formerly Clifton School) in the north-west corner of the site primarily in a mixture of historic and more recent educational buildings, and St Peter's 8-13 (Formerly St Olave's) on the south east of the campus located in the former LEA Girls Grammar School, which itself had expanded into numerous low cost post war additions to the original 1908 listed building before it closed. Three boarding houses are situated nearby on adjacent streets within short walking distance of the main school campus.

## **Numerical Growth**

13. In 1901, the joining of St Olave's school to St Peter's added 70 pupils to the 69 boys recorded at St Peter's in 1900. A century later, in 2001, when the three sections of the school were all brought together on one enlarged site, Clifton school had a roll of 125 pupils aged 3-8, St Olave's 336 pupils aged 8-13 and St Peter's had 492 students aged 13-18, with a grand total aged 3-18 of 953. In the following two decades numbers have steadily increased to 1217 in May 2021 now aged from 2-18 years.
14. Currently 48% of pupils attending the school have a home address within the CYC boundary (58% if you include boarding pupils who live on site). 91% of all pupils have a home address within a 15 mile radius of the School. It follows that the school provides an important educational facility to a significant number of children of families who live within the City Council's administrative area.



## B. Strategic Vision

15. The strategic aim of the school is to further develop the provision of excellent independent education for pupils aged 2-18. The school is a dynamic institution, ever changing and evolving as the curriculum develops, pupil numbers grow and as various requirements demand, for example changing educational needs, legislation, compliance issues or a desire for energy efficiency and a drive for increased sustainability.
16. An innovative and creative campus development master plan has been developed to deliver a comprehensive range of facilities required to facilitate the above and to secure the school into the foreseeable future.
17. The plan addresses obvious shortcomings with the school's current estate as well as ensuring that the site is updated in order to provide high quality academic learning spaces in which to deliver the needs of a contemporary and developing curriculum as well as expanded, state of the art, co-curricular facilities which are increasingly required particularly for sport, music and



*Pascal Building (Maths & Languages) Completed 2018*

performing arts. It also addresses the communal, pastoral and support space requirements ensuring they are more adequately and innovatively met.

18. St Peter's school has a vision to continue to steadily grow day and boarding school numbers up to 1400 from age 2-18 over the next 10 years. This limited growth will enable the school to more adequately meet the need of prospective parents, improve the pupil experience whilst still retaining the distinct St Peter's feel, pastoral model, educational ethos and school culture. It will also ensure that the school is more sustainable economically maximising the use of our assets but without outgrowing the site. Importantly this level of growth is considered to be around the maximum size that the school envisaged growing to. As well as the obvious limitations from the size of its estate, were the school to be any larger then it would risk jeopardising its ethos and the standard and quality of the education that it provides.
19. St Peter's School as custodians of a diverse estate for current and future generations recognises the importance of considering the long-term impact of decisions made today, particularly in relation to the development and use of the site. It is the desire of St Peter's School to be good



stewards of the resources it has, to be efficient with the resources required to run and develop the school, reducing our carbon footprint and minimising the impact we have on the planet. The school also recognises our responsibilities to those that surround us both minimising any negative impact it may have and maximising its potential use and benefit for the wider community.

## C. Challenges and Constraints of the Physical Estate

20. St Peter's has invested heavily in the campus, with over £7m spent on major building projects in the last few years. However, the site still has a number of significant challenges and a strategic plan has therefore been developed in order to overcome many of the constraints and obstacles to the continued success and the implementation of the vision of the school, has been drawn up. The primary challenges constraints are:

### (i) Listed Buildings

21. We are inheritors of a stock of beautiful grade II listed buildings, many of which were built in the early 19<sup>th</sup> Century, which dominate the northern part of the campus bordering the A19. These, along with the original early 20<sup>th</sup> Century Walter Brierley designed Queen Anne's Grammar School building, are however a challenge to maintain, inefficient to run, and also are limited in how they can be developed to be fit for purpose spaces for delivering a contemporary 21<sup>st</sup> Century curriculum. It will of course be noted that but for the intervention of the school that the listed building at the core of Queen Anne's Grammar School would have been sold for conversion for a non-educational use. It is therefore a source of pride that the school has been able to retain this listed building in the use for which it was originally designed.



*Northern part of the campus*

22. As custodians of these historically significant listed buildings, we strive to maintain them well, sensitively developing and utilising them. However, costs are high and development opportunities are limited, particularly in the constrained and congested northern part of the campus. Strategic development of other sections of the campus is therefore essential to enable growth but more importantly to secure the essential improvement of the school facilities to the required standard.

## (ii) Legacy Buildings



*Southern part of the campus, former Queen Anne's Girls' Grammar School*

23. We have inherited a significant stock of low quality, low density, post second world war buildings which are no longer fit for purpose and have in any event reached the end of their design life. The majority of these buildings are located on the south side of the campus and were built as extensions to the Queen Anne's Girls' Grammar School, and their redevelopment has been an ongoing project since they were first acquired from the City. They have now been adapted to various degrees for use as a coeducational independent preparatory school.
24. Those buildings, although well looked after, are no longer fit for purpose. They are typically poorly insulated, difficult and expensive to maintain and costly and inefficient to run. Many of them have flat roofs with inadequate drainage. Asbestos was a popular building material during this period and although much has been removed or contained, and all properly identified and under a strict management plan, the maintaining and developing of these buildings is a complex and expensive process.
25. On the northern side of the campus there are also some comparable buildings, with similar issues, constructed in the mid to late 20<sup>th</sup> century that were originally built to meet the needs of a boys boarding school. However, these buildings now serve a larger coeducational school

and often a much broader age range. For example, the Senior School Sports Hall and changing facilities was built in 1974 to serve 421 boys but is now required to serve the needs of a coeducational school Senior school of 569 and is also used by the 194 pupils at St Peter's 2-8. Its ancillary facilities are particularly sub-standard and in urgent need of replacement. Such facilities as well as being out dated no longer adequately meet the needs of the school community.

### **(iii) Large Indoor Spaces**

26. The existing large internal spaces in all three areas of the school are at capacity. The halls used for assemblies, chapels and for dining are often full on a daily basis and larger communal spaces are immediately required.
27. The chapel built in 1861 was reconfigured and had a balcony added in 1974 in order to seat 450. This now means that pupils and staff at the senior school cannot comfortably worship together. Regular communal worship is at the heart of the ethos of St Peter's School.
28. The Memorial Hall, extended in 1960 and further improved in 2012, has a capacity of 450 – 500 depending on configuration. The Hall cannot therefore comfortably seat a whole senior school gathering, and is frequently found lacking in capacity and sophistication for the huge range of internal and external events it is required to host.
29. The dining room at St Peter's has been evaluated by catering consultants who calculated that in the current space and time allocated it should cater for 450 covers. At lunchtime we currently feed up to 900 every day, which inevitably leads to long queues and significantly detracts from the dining experience.
30. It is essential that increased provision for the chapel, dining and assembly functions for the current school numbers, even without the anticipated growth. These problems have been particularly evident during the current crisis.

### **(iv) Physical Relationship and Relative Location of Buildings**

31. Due to the nature of the existing buildings on the northern campus and the evolutionary nature of the growth and development of the school, there is a clear need for the rationalisation and reorganisation of the campus to improve the efficiency of the site and its internal and external spaces. For example, some departments teach in classroom spaces distributed all around the site. This led to the proposed creation of "learning hubs" gathering departments and related subjects together. This became a key driver in the development of the recent award winning Pascal building which provides hubs for Mathematics and for Modern and Foreign Languages.
32. However, currently the sciences are spread over the campus, with Biology located at significant distance from Chemistry and Physics, and remote from other STEAM subjects such as DT, Art and Computer Science.



33. The school aims to further develop its facilities for teaching, in logical and strategic relation to each other, to foster cooperative and blended contemporary learning.

#### **(v) Duplication and Consolidation**

34. Due to the way that the school has developed, acquiring additional buildings and facilities over the years (most notably the acquisition of Queen Anne’s Grammar School in 2001), the school has now various facilities which are separated, duplicated, poorly located, and/or inadequate. Though much work to improve and rationalise the campus has been undertaken, there is still a significant need for consolidation, rationalisation and improvement of facilities. The development of new facilities for Sport, Music, Art, Drama and DT are prime examples of dated and low quality amenities which require a whole school development approach. The new master plan aims to provide more logically located, fit for purpose facilities that properly serve all sections of the school but are also designed and located to be more suitable and easily available for use by the wider community.



*Former Queen Anne’s Grammar School 1908-1910*

#### **(vi) Compact Site**

35. St Peter’s campus, compared to our many rural competitor schools, is a relatively small and compact 19 hectare site in the heart of a city. 15% of the campus is on the “wet” side of the flood defences. It is therefore essential to maximise the use of every area of the site, without compromising the open feel of the campus or reducing key outdoor green spaces and sports provision. The northern side of the campus is already well developed and further major construction is constrained by the number and density of listed buildings. The southern part of the campus, is however less densely built with greater scope to creatively develop and reconfigure the layout through the removal or refurbishment of the significant number of low quality and low density buildings and other facilities.



## D. Conclusion

36. The continuous and extensive improvement of the school site and facilities in the heart of York is essential to fulfilling the vision of the Board of Governors and ensuring the future success of St Peter's School.
37. Were the green belt boundary to be drawn as currently proposed by the City it would essentially ignore the evident and multiple needs of the school to secure the above improvements to its estate. It is highly regrettable that the City Council has not liaised properly with the School to understand its needs and sought to draw the green belt boundary accordingly. Whilst it is understood that green belt designation is not an absolute preclusion on development it nonetheless seriously undermines our ability to properly plan for known eventualities.
38. Should the green belt boundary be drawn in the most logical location – ie on the top of the newly increased in height flood defences then the school would intend to bring forward the masterplan within the next 15 years, thereby securing the future for the school as one of the City's key assets.
39. It is of paramount importance for the school to enhance and expand high quality educational facilities to ensure continued and improved educational excellence in an ever more competitive and challenging environment. The school is an evolving institution, with numerous existing constraints to developing the facilities as outlined above. The ability to redevelop and reconfigure the southern side of the campus in particular is seen as essential for the sustained success of the school without additional constraints, such as the proposed green belt boundary, which will clearly hinder unacceptably the reconfiguration and redevelopment of the whole site.



*View of the Southern campus from the north*



This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified of any discrepancy. This drawing is copyright and remains the property of McNeil Beechey O'Neill LLP.



1. First Team Cricket Field
2. 35x30 Cricket Nets / MUGA
3. First XV Rugby Pitch
4. Riverside Pitches
5. Colts Pitch
6. Wightman Pitch
7. St Peter's 8-13 Pitches
8. The Paddock
9. Tennis Court / Netball Court
10. Tennis Courts / Netball Courts
11. Tennis Courts / Netball Courts
12. Astro Turf
13. Tennis Courts / Netball Courts
14. St Peter's 8-13 Lawns
15. St Peter's Playground
16. St Peter's Play Area
17. St Peter's 8-13 Fitness Trail
18. St Peter's 8-13 Playground & Equipment
19. St Peter's 8-13 Quiet Garden
20. St Peter's 8-13 Playground Equipment
21. St Peter's Informal Spaces
22. Long Jump Pit
23. Boarding House Gardens

Client:  
St Peter's School, York

Project Title:  
Master Plan

Drawing Title:  
Existing Location Plan  
with Labelled Sports  
Pitches

Scale @ A1: 1:1250 Date: 18-05-21 Drawn: jch

Project Ref: SP06 Drawing No: 001 Stage: 1 Rev: b

File Ref: K:\Job\St Peters Site Survey Q3 2021





This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified of any discrepancy. This drawing is copyright and remains the property of McNeil Beechey O'Neill LLP.

### St Peter's School Listed Buildings & Clifton Conservation Area

- Grade II  
(in conservation area)
- In conservation area
- Outside conservation area
- Clifton York  
Conservation Area

1. Linton House (off campus)
2. Manor House (off campus)
3. Dronfield House (off campus)
4. Clifton & Grove Day House
5. The Lodge
6. School House (off campus)
7. Main Building St Peter's
8. Memorial Hall
9. Chapel
10. Library
11. Burton Cottage
12. Music School
13. Drama Centre and Music Annexe
14. Queens Building
15. Pavilion (P Block)
16. Science Block Old Chemistry
17. Science Block New Physics
18. St Catherine's
19. Pascal Building
21. CCF Building (St Olave's Site)
22. White House (Denison House)
23. Chilman Building
24. Estate Offices
25. Wentworth House
26. Clifton Dining Room
27. The Rise Boarding House
28. Sports Centre
30. Swimming Pool
31. Boat House
- 31a. Upper Boat House
32. STP 8-13 Main School (Formerly St Olave's)
33. St Olave's Art/Design & Tec
34. St Olave's Music Department
35. C Block (Senior Art & Biology)
36. Astro Changing Rooms
37. St Olave's Sports Hall

Rev	Date	Details	By

**mbo architects**

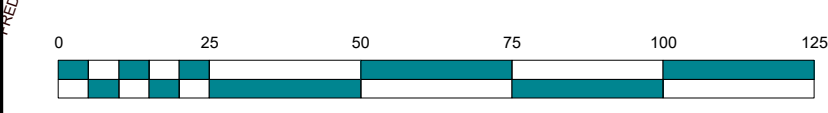
Castle Gate House,  
28 Castle Gate,  
York,  
YO1 9EP  
Tel: (01904) 495500  
Email: mbl@mboarchitects.co.uk

Client:  
**St Peter's School, York**

Project Title:  
**Master Plan**

Drawing Title:  
**Listed Buildings and  
Conservation Area**

Scale @ A1: 1:1250	Date: 18-05-21	Drawn: jch
Project Ref: <b>SP06</b>	Drawing No: <b>002</b>	Stage: Rev: <b>1 - b</b>





This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified of any discrepancy. This drawing is copyright and remains the property of McNeil Beechey O'Neil LLP.

### St Peter's School Building EPC Ratings

- A** 0-25
- B** 26-50
- C** 51-75
- D** 76-100
- E** 101-125
- F** 126-150
- G** Over 150

100 would be typical



Client:  
**St Peter's School, York**

Project Title:  
**Master Plan**

Drawing Title:  
**Energy Efficiency Estate Plan**

Scale @ A1: 1:1250    Date: 18-05-21    Drawn: jch

Project Ref: SP06    Drawing No: 003    Stage: 1    Rev: b

File Ref: K:\Job\St Peters Site Survey Q3 2021



This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified of any discrepancy. This drawing is copyright and remains the property of McNeil Beechey O'Neill LLP.



### St Peter's School Building Quality Index

- CAT A**  
Adequate
- CAT B**  
Inadequate
- CAT C**  
Residential

1. Linton House (off campus)
2. Manor House (off campus)
3. Dronfield House (off campus)
4. Clifton & Grove Day House
5. The Lodge
6. School House (off campus)
7. Main Building St Peter's
8. Memorial Hall
9. Chapel
10. Library
11. Burton Cottage
12. Music School
13. Drama Centre and Music Annexe
14. Queens Building
15. Pavilion (P Block)
16. Science Block Old Chemistry
17. Science Block New Physics
18. St Catherine's
19. Pascal Building
21. CCF Building (St Olave's Site)
22. White House (Denison House)
23. Chilman Building
24. Estate Offices
25. Wentworth House
26. Clifton Dining Room
27. The Rise Boarding House
28. Sports Centre
30. Swimming Pool
31. Boat House
- 31a. Upper Boat House
32. STP 8-13 Main School (Formerly St Olave's)
33. St Olave's Art/Design & Tec
34. St Olave's Music Department
35. C Block (Senior Art & Biology)
36. Astro Changing Rooms
37. St Olave's Sports Hall

Rev	Date	Details	By

**mbo architects**

Castle Gate House,  
28 Castle Gate,  
York,  
YO1 9EP  
Tel: (01904) 495500  
Email: mbl@mboarchitects.co.uk

Client:  
**St Peter's School, York**

Project Title:  
**Master Plan**

Drawing Title:  
**Building Quality Index**

Scale @ A1: 1:1250	Date: 18-05-21	Drawn: jch
Project Ref: <b>SP06</b>	Drawing No: <b>004</b>	Stage: Rev: <b>1 - b</b>





This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified of any discrepancy. This drawing is copyright and remains the property of McNeil Beechey O'Neil LLP.



### St Peter's School Departments and Uses

- Accommodation
- Estates
- Mixed Academic
- Performance Hub
- STEAM Hub
- Dining Hub
- Sports Hub
- Medical Centre
- Library

- Points of Entry
- Impact of proposed CYC Green Belt Boundary
- Site Boundary

- A** Performance Space
- B** Music
- C** Sports Music & Exams & Performance
- D** Art & Technology
- E** Parking
- F** Medical Centre
- G** Dining Hub

Client:  
**St Peter's School, York**

Project Title:  
**Master Plan**

Drawing Title:  
**Proposed Master Plan**

Scale @ A1:  
1:1250

Date:  
18-05-21

Drawn:  
jch

Project Ref:  
**SP06**

Drawing No:  
**005**

Stage:  
**1**

Rev:  
**c**

File Ref: K:\Job\St Peters Site Survey 03 2021







# St Peter's School, York



**15 YEAR DRAFT  
DEVELOPMENT  
MASTER PLAN**



# CONTENTS

<b>1</b>	<b>Introduction</b>	<b>4</b>
1.1	The Proposal	4
1.2	Site Location	4
1.3	The Campus	4
1.4	Master Planning Principles	5
1.5	Master Plan Document	5
<b>2</b>	<b>Site analysis</b>	<b>6</b>
2.1	Built Landscape and Physical Setting	6
2.2	Urban Context	8
2.3	School Facilities on Campus	10
		10
2.4	Facilities Off Campus	10
<b>3</b>	<b>Constraints &amp; Opportunities</b>	<b>11</b>
3.1	Identified Constraints	11
3.2	Identified Opportunities	11
3.3	Future Capacity for Growth	15
3.4	Traffic	15
3.5	Energy Efficiency	16
<b>4</b>	<b>Vision &amp; aims</b>	<b>17</b>
4.1	Distinctive	17
4.2	Permeable and Connected	19
4.3	Attractive	20
4.4	Sustainable Development	20
4.5	Safe	20
<b>5</b>	<b>Master Plan Guiding Principles</b>	<b>22</b>
5.1	Master Plan Concept	22
5.2	Key Features	22
5.3	Design Principles	22
5.4	Proposed Master plan	23
5.5	Building Typology	25
5.6	Landscape & Greenspaces	25

5.7	Biodiverse - Sustainable Development	26
<b>6</b>	<b>Summary</b>	<b>27</b>
<b>7</b>	<b>APPENDICES</b>	<b>28</b>
7.1	SP06-001 Existing Sports Facilities Plan	28
7.2	SP06-002 Listed Buildings & Conservation Area Plan	28
7.3	SP06-003 Energy Efficiency (EPC's) Estate Plan	28
7.4	SP06-004 Building Quality Index	28
7.5	SP06-005 Proposed Draft Master Plan	28
7.6	SP06-006 Proposed Greenbelt Boundary	28



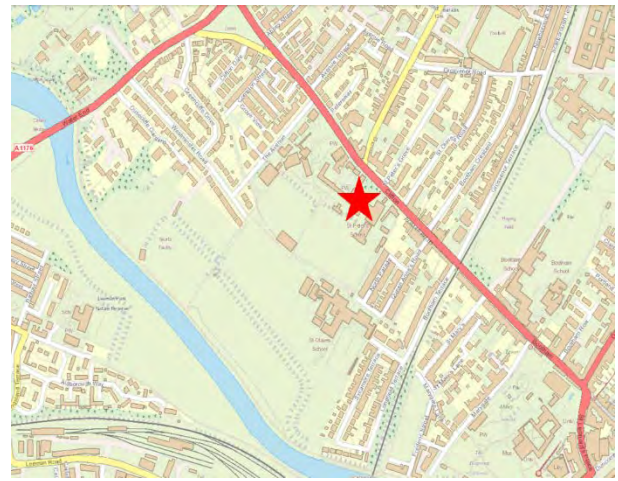
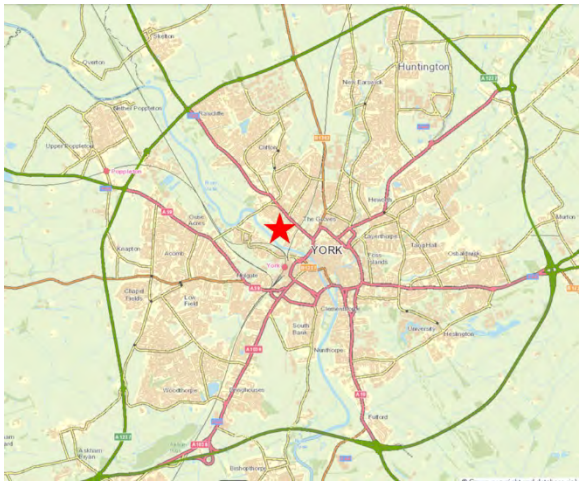
# 1 INTRODUCTION

## 1.1 The Proposal

The proposed master plan seeks to establish the development framework for the school over a 15-year period, 2021-2036. Considering the school's vision and aims to provide the best possible learning environment for its students. Including modern academic, sports, performance facilities, environment, energy efficiency, and considering transport provision to support the school's onward growth.

## 1.2 Site Location

St. Peter's School site is located off the A19 (Clifton) to the west of York City centre. Within the A1237 Ring Road in the west and North of the River Ouse.



## 1.3 The Campus

The whole school estate extends to approx. 19ha. However, the main school campus is 17.6ha being located to the West of York City centre and to the South of the A19. To the North the campus is served and bounded by the A19 a main arterial route into city via Clifton and Bootham, to the West and East boundaries the site is enclosed by development which is predominantly residential in nature. The Southern aspect of the site is open, being bounded by a newly improved widened and heightened clay flood barrier, flood walls and an area of wash land to the River Ouse. Part of the lower site is also subject to flooding as it forms a wash land area. Currently the wash land at the southernmost boundary and East and West of the new boat house is occupied by sacrificial practice sports pitches. Currently designated as educational use there will be no requirement to change this.

The current campus is physically separated into a North and South Campus by an existing PROW, running East-West between Queen Anne's Road to the east and the Avenue and Westminster Road to the West. The two respective parts of the Campus are connected across the PROW via a footbridge at the Queen Annes Road end of the PROW.

It should be noted therefore that the terms North and South Campus' referred to elsewhere in this document, refer to those parts of the campus which lay either South or North of the PROW.



Image showing existing Public Right of Way No.55/139/10

## 1.4 Master Planning Principles

We could say that the master planning process started back in 1844, and over the next 100 years or so, it evolved and as with all master plans it was replanned and re-evaluated.

The guiding principles for the current master planning process are a combination of the following:

- The school's strategic vision and aims.
- The establishment of hubs (Grouped facilities rather than standalone departments).
- Improved traffic management.
- Provision for enhanced Music, performing arts, sport, expansion of the STEM hub to form an inclusive STEAM hub and dining facilities.
- Improved connections within the site.
- Responding to the schools ongoing development needs and improved facilities master plan for a minimum 15-year period.

## 1.5 Master Plan Document

This document has been developed to provide the following:

- Site analysis, constraints, and opportunities.
- Basic landscape and physical appraisal.
- Proposed draft master plan.
- Brief indication of the design principles to be developed.



## 2 SITE ANALYSIS

### 2.1 Built Landscape and Physical Setting

By virtue of its inherent history St. Peters School provides education through a varied building medium. Consisting of some fine period listed buildings, through to newly built high-quality blocks such as the Pascal building completed in 2018 and the slightly later boat house.

#### North Campus

All buildings set within the north campus are coherent with one another and tell a visual story of development and growth.



St Peters School North Campus looking South.

#### South Campus



South campus formerly known as St. Olaves, with the Grade II listed former Queen Annes School to the left.



Within the south campus the grade II listed building Queen Anne's Girls Grammar School, dated 1908 (latterly known as St. Olave's), extended post war era with steel/concrete frame and prefabricated panels. Acquired by St. Peter's as a valuable asset to the estate and onward development of the school.

The site generally falls from North to South in a series of plateaus created through the onward development and cut and fill, to achieve satisfactory level drained sports pitches above the wash land area at the lower end of the site adjacent the River Ouse.



Campus view from the southwest along the River Ouse

It is clear the original school building along Clifton has stood isolated and in splendour, for many years. A position and context enjoyed to this day when approaching the school from either Clifton Green or Bootham. Helped by the abundance of mature trees, being set back from the road and resplendent sympathetic additions of the Chapel and current library. As the area around the site became subject to more suburban development, the school has retained its setting along Clifton. Through the acquisition of several land parcels and buildings, allowing the school to grow and has formed the context we see today.

The school's expansion had been sufficient in the past. As we see today the North and South parts of the campus are now at capacity in terms of land use. A more pressing issue and one that has been a significant factor in master planning for the future is the condition of some building stock which is now at end of useful life in quality and useability. Further land is not available to the school and replacement would be the most economical option to reach the schools aims and policies, in the future. However, this in turn requires we consider the decant spaces,





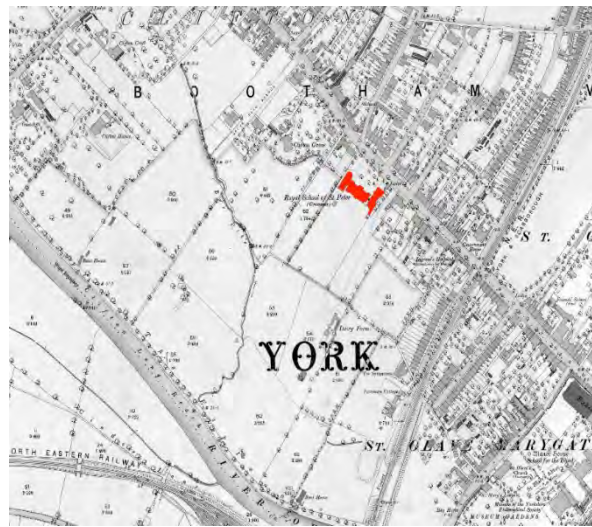
construction compounds and access. To ensure the school can continue to function with minimal disruption a point of paramount importance and non-negotiable for the school.

## 2.2 Urban Context

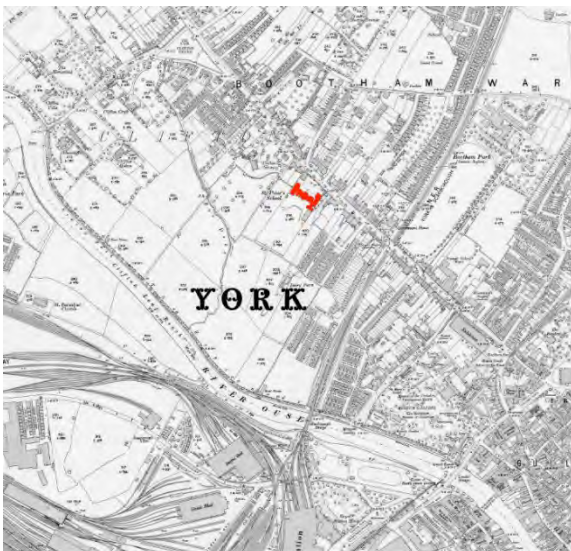
The present site has been occupied by St. Peter's School since 1844, although the site has been occupied in one form or another since the Roman period. Most of the surrounding urban area, that is to say the buildings outside the bar walls have developed since the 1850's. The original school building occupies the high ground above the earlier flood levels of the River Ouse to the South.



1852



1892



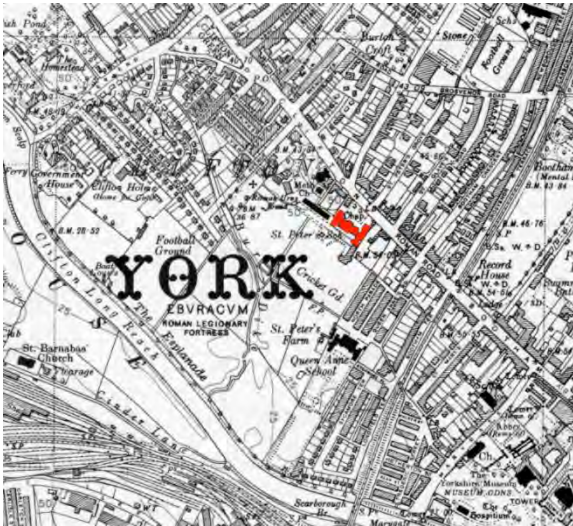
1909



1931

Victorian Development of the area around the campus started along Clifton and Bootham, by the turn of the 20<sup>th</sup> century development progresses to occupy the land to the West and East of the current Campus demise.





1952



2017

There is a good mix of property types from Victorian Villas and town houses to Edwardian Terraces, inter and post war suburban semis. The school itself had also developed during this period adding additional buildings and facilities, through disposals and acquisition the school's estate increased during the 20<sup>th</sup> and 21<sup>st</sup> centuries, to form the campus we see today.

Much of the school's massing is set to the North of the site with a smaller concentrated element to the Southeast, being the former Queen Anne's Girls Grammar School, acquired in 2001. Circulation, parking, service areas and playing fields occupy the remainder of the site, save the isolated swimming pool and more recent boathouse.



Current view of the school from the river, shows the improved flood defence work at the centre axis of the image. Former St. Olave's School just to the right of centre.



## 2.3 School Facilities on Campus

Existing facilities within the school campus encompass every type one would expect for a school of this size and type to function. As a boarding school there are additional facilities such as boarding houses, and pastoral facilities. However, currently some stock is now in need of upgrade or replacement. Changes in the curriculum and increase in pupil numbers will require some academic facilities to upgrade, increase in any case, with the gradual rise in pupil numbers. While other areas will require replacement refurbishment as part of an ongoing program of improvement to form facilities of an acceptable standard. Modern curriculum requirements also place an onus to plan ahead, improve and provide. More details can be found in the appendices.



Cricket square, north campus



First XV Rugby, north campus



Chilman Building, north campus



Pascal Building, north campus



Swimming Pool, north campus

## 2.4 Facilities Off Campus

The school currently finds that it needs to use offsite third-party facilities on a regular basis, which adds to its carbon footprint. Those offsite facilities generally being sport all weather pitches, squash courts, gyms for cardio and physio due to the somewhat stretched and undersized facilities on the school campus.

## 3 CONSTRAINTS & OPPORTUNITIES

An initial examination of the site sought to identify the constraints and opportunities which would govern the future development plan of the site in terms of its estate and meeting the future academic, sports, music, and pastoral needs of the school.

### 3.1 Identified Constraints

- 15% of the site is affected periodically by flooding of the EA designated washland.
- Site is divided by an existing public right of way (PROW 55/139/10).
- Listed Buildings and an area of the site within the conservation area.
- Impact on neighbouring residential properties.
- Poor vehicular access to southern campus.
- Relatively poor condition, outdated facility provision of some building stock.
- Implementing a plan of renewal will require repositioning some facilities, including a new sports hub. Retention of available land to decant parts of the school to temporary accommodation on campus and serve as construction compounds and haul roads. This will be better served to the South of the PROW, retaining the existing historic sports pitches to the north of the public right of way.
- York City Council revised Green Belt Boundary if adopted will adversely affect the school's ability to develop in the future.

### 3.2 Identified Opportunities

- Opportunity to provide better access to the south campus.
- Improvement of the existing sports facilities in terms of building stock and installation of all-weather pitches.
- Improvement of academic facilities, without detracting from the historic nature of the site.
- Enhance biodiversity of the open space boundaries.
- Reduction of the carbon footprint through reduced travel and BREEAM very good to excellent energy efficient building design and construction.
- Landscape opportunities.
- Much of the proposed new build will be a replacement of existing end of life building stock.
- Move the proposed green belt boundary in line with the current clearly defined physical edge of the flood defences. Confirmation of the green belt boundary along the flood defences will allow the school to develop north of the flood bank and provide a sustained program of evolution for the school campus over the next fifteen to twenty years.





South Campus buildings - image shows that upgrade will be cost prohibitive.



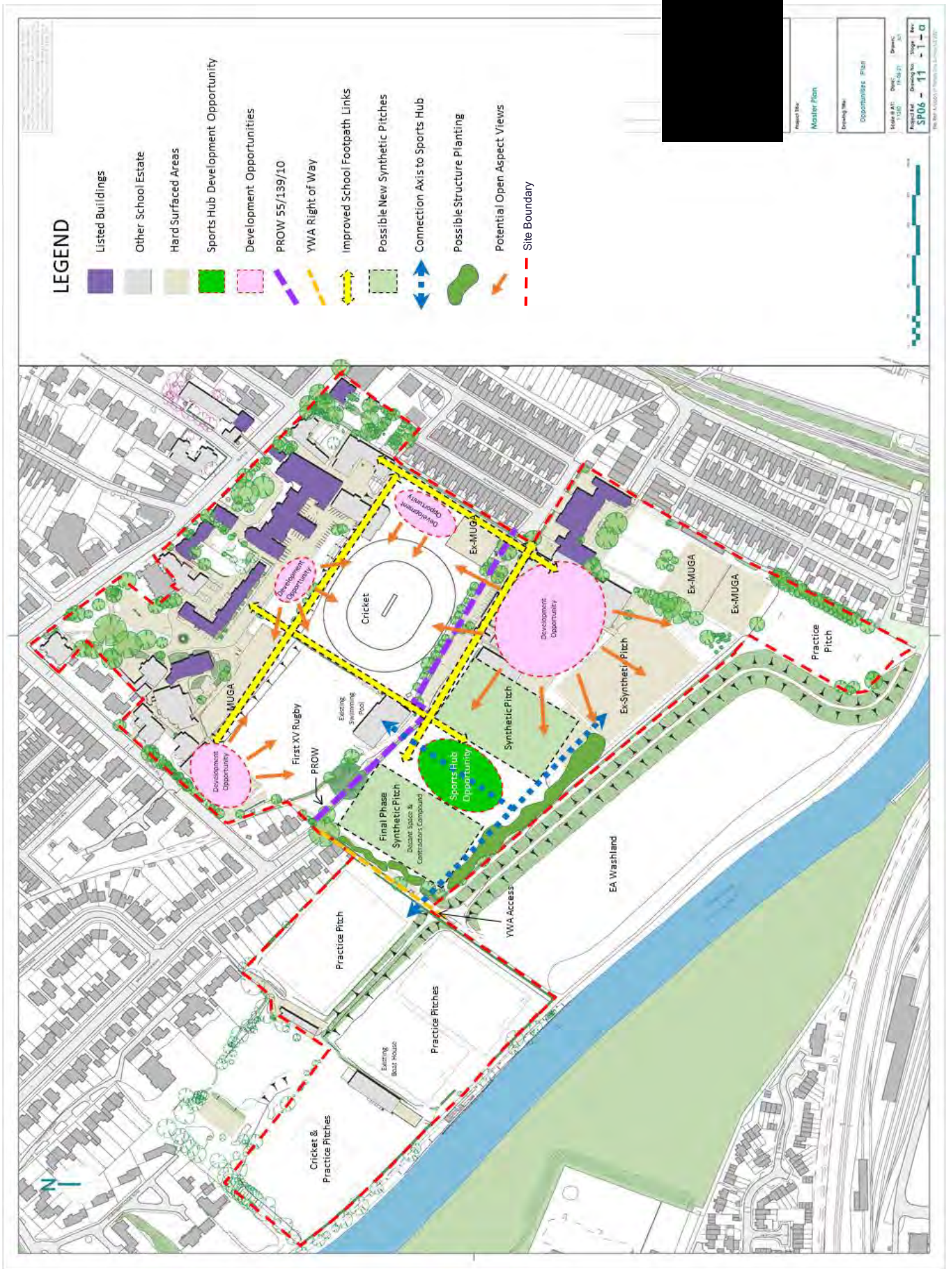
South Campus in the foreground, image taken before completion of enhanced flood defence works.





Constraints Plan - not to scale





Opportunities Plan - not to scale

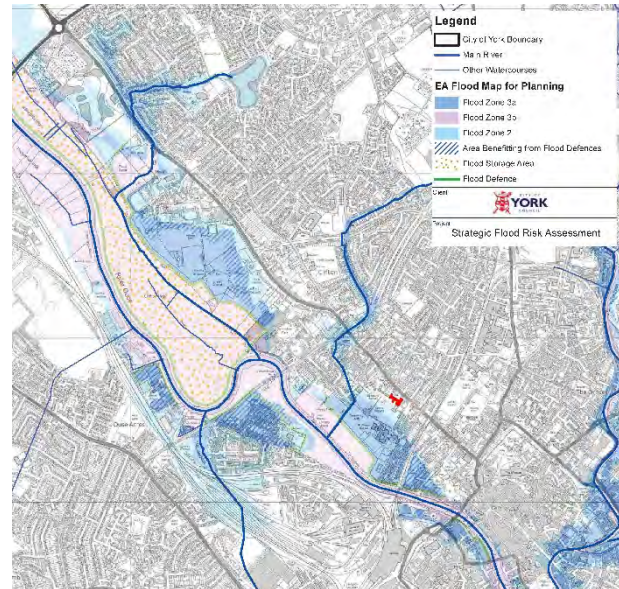


### 3.3 Future Capacity for Growth

Despite the historical and urban constraints, the campus still offers good capacity for growth through redevelopment and improvements brought about by a cohesive master plan to be implemented over a 15 to 20-year period.

#### Flood Risk

Recently enhanced flood defence work (due to complete 2021) has reduced the risk of serious flooding to most of the site except the two areas either side of the boathouse, designed to act as washlands for temporary flood storage. Currently those playing fields to the extreme south of the school's boundary. Despite the completion of the much-improved flood defences, the EA flood mapping still shows a large proportion of the school playing fields in the wash land area. This currently affects two sacrificial pitches to the West and East of the boat house. Prompting the school to make better use of the land immediately north of the flood defences for synthetic pitches.



EA Strategic Flood Risk Assessment.

### 3.4 Traffic

Traffic on site and in the surrounding streets is a significant concern to the school. Drop off and pick up times can result in increased congestion in the surrounding streets. Although peak traffic generally last around 30minutes twice a day. Having large numbers of cars passing through the site with the current road layout raises safety concerns.

Various initiatives to reduce the traffic have been implemented by the school, such as park and stride, cycle shelters and cycle training, car sharing initiatives and a park and ride initiative with Bootham School which was about to start pre- Covid. There would be no reason why such initiatives would not continue to be implemented into the school's future travel plan.

The school like many others has had to adapt to providing drop off zones and increased visitor parking. However, a further issue is the day to day servicing the site, by deliveries and coaches ferrying students to offsite facilities and activities, which impacts on the local community.

How people travel to and through the site is also key factor in the development plan. Improving traffic flow on site through careful design will in turn improve traffic congestion off



site. Development of facilities to enable better and safer use of more sustainable travel options for pupils and staff. For example, bus access, cycle ways and storage, as well as developing facilities to exploit park and stride and park and ride solutions will be part of the detailed strategy.



Looking North up Queen Annes Road with its restricted access, due to resident parking



Clifton (A19) looking East, can be congested in peak hour traffic. School on Right

### 3.5 Energy Efficiency

Current energy efficiency is well below par for several existing buildings. St Peter's School as custodians of a diverse estate for the current and future generations recognises the importance of considering the long-term impact of their decisions made today, particularly in relation to the future development of the site. It is the aim of St Peter's School to be good stewards of resources, to be more efficient with the resources required to run and develop the school, and to reduce the impact this will have on the planet.

It is therefore a key driver for the development of the campus to continue to improve energy efficiency and to move toward more sustainable energy sources. The lifetime environmental impact and costs of new buildings and the replacement or redevelopment of old building stock are part of the design and development strategy. Current energy efficiency levels are detailed in Appendix 7.1 showing current EPC's.



Poor quality CLASP procured previous LA stock in need of replacement has minimal architectural value in terms of fenestration and quality of build.

## 4 VISION & AIMS

St Peter's School vision is to be able to carry on doing what they do with great success, delivering outstanding academic excellence with an extensive and diverse range of well-resourced co-curricular activities. To have the flexibility on site for continued development of the school as a creative, sustainable campus. The following aims are based upon a need and expectation to deliver its vision.

### 4.1 Distinctive

The plan aims to create a distinctive development, one which continues the sense of place that has become synonymous with the history and setting of the school. The master plan reflects a continued evolution of the school campus to provide quality facilities, an intrinsic element for the delivery of a first-class education. As such the facilities that currently require significant enhancement are as follows:

#### **Music:**

St Peter's has a nationally recognised music department which produces outstanding music and musicians from limited facilities the heart of which is a converted town house. Practice and teaching rooms are few and instrumental lessons and practice can be heard taking place all over the school in various rooms and spaces which were not designed for this purpose. More recently, to accommodate the additional 80 individual music lessons a week required for the choristers who joined the school in 2020, temporary converted glamping pods were hurriedly installed as music teaching and practice rooms. The school requires dedicated purpose-built music teaching, practice, and ensemble rooms, as well as improved appropriately designed performance spaces more suitable for hosting music events.

#### **Performing Arts:**

School productions are of an extremely high standard and have a very dedicated team who work hard to achieve amazing results transforming the halls into spectacular theatre venues. However, these spaces are outdated and have limited capacity. A purpose-built performance space with a greater audience capacity, which could also overcome some of the other constraints mentioned above is required, plus additional rehearsal and studio space to meet the needs of the drama curriculum more adequately.



### Sport:

St Peter's Sport achieves national success at all levels and in a broad range of girls and boys sport at all age levels. Some facilities are however outdated with limited capacity. Due to the city centre nature of the site, the school has fewer sports pitches than most of its competitor schools. This is further limited due to two areas of sports pitches being located on the river side of the flood defences. The amount of time these are unavailable due to the EA mitigated designed flood wash being implemented, appears to be increasing putting further pressure on the remaining grass pitches.

The construction of a synthetic pitch in 2008 suitable for hockey and tennis brought significant improvement to the school's sport facilities. However, with the rapid increase in popularity and success in hockey the school is now transporting students to other synthetic pitches all-round the city for practice and for matches which is highly undesirable, a waste of time for staff and pupils in an already busy day and puts additional coaches on the road network of York. In winter, the lack of floodlights on the existing pitch means that they are not able to fully utilise the pitch and must travel to floodlit facilities instead. The installation of another synthetic pitch for Hockey, and installation of flood lights for both is essential.



Recently completed boat house

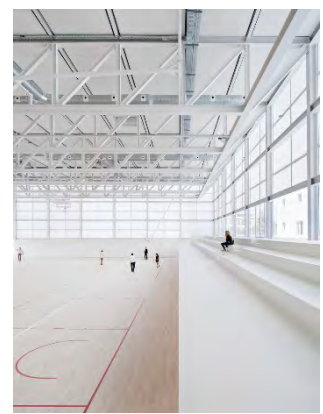
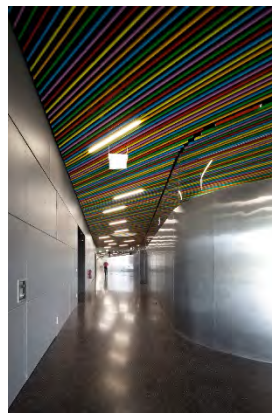
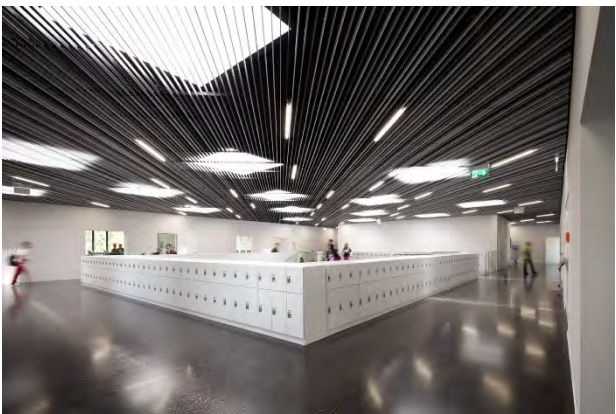
To have at least one of these as a covered surface by installing an "air dome" or other appropriately designed cover to enable play in all weathers would be ideal. To reduce pressure on the grass surfaces further the installation of more synthetic pitches for football and rugby are also required. Thus, increasing the number of plays per week, and during times of inclement weather offering an on-site alternative to the sacrificial practice pitches in the washland area of the campus.



Existing sports hall

The current sports halls now reflect out of date standards and do not comply with the latest Sport England design specifications. Other facilities, such as the strength and conditioning suite and weights room although having the latest equipment are too small to cater for the upward demand. Additional space for fitness equipment, including specialist equipment for sports such as rowing are much needed additions to the sports facilities.

Further facilities would include studio space for exercise and dance classes. Multiple changing and showering facilities. Introduction of onsite squash courts, medical and physio rooms. Dedicated sports classrooms and offices should all form part of a central sports hub.



Aspirations to create a multifunctional sports hub, embracing updated facilities and flexibility for future use.

The improvement of sports facilities and the development of a “sports hub” designed to provide much needed improved facilities for the school as well as more accessible and a wider range of facilities for the community is one of the central aims of the site development plan.

## 4.2 Permeable and Connected

The masterplan is developed around an existing hierarchy and series of open spaces linked by existing pedestrian footpaths, cycle ways and vehicular routes within the safe guarded areas of the campus. In terms of external connections, the plan relies upon the existing vehicle and pedestrian accesses including the continued provision of the PROW detailed elsewhere.





Looking west on the existing PROW



Existing PROW looking west showing school pedestrian bridge crossing



Gated path adjoining PROW to the east



Footpath linking Queens Building with swimming pool



Gated access to south campus from PROW

Reviewing emergency access to the south and north campus areas, and also reviewing additional student connections between the north and south campuses.

### 4.3 Attractive

Attractive buildings and landscape that will enhance the site. Taking account of external views into the site and exploiting the open spaces defining and creating biodiversity opportunities.

### 4.4 Sustainable Development

To improve energy efficiency, through the provision of best practice design to achieve sustainable material usage, high levels of insulation, power generation, to achieve BREEAM 'excellent' or as a minimum 'very good'.

### 4.5 Safe

Student and staff safety will remain an important part of the master plan design, taking every opportunity to improve safeguarding policy by designing out possible issues at the outset.

The covid pandemic, has required some creative thinking in order to implement measures to safeguard all, during the unprecedented times. Moving forward there is no reason why the future planning for the school would not take such measures into account. Ensuring that should there be a recurrence or similar situation the school and campus will be prepared to meet any new restrictions. We already know that an important element in the suppression of cross contamination comes from being able to provide adequate social distancing. This in turn puts pressure upon the educational environment, which requires flexibility in the use of space both internally and externally and as such, the school aims to be fully prepared through the provision of the development master plan.





# 5 MASTER PLAN GUIDING PRINCIPLES

## 5.1 Master Plan Concept

The master plan aims to provide a considered overall plan for the site, developing a concept layout developed in conjunction with existing facilities and building stock of St Peter's School. The intention is to provide key design principles and the basic conceptual layout upon which detailed planning applications can be based.

The overarching concept is for the development of a phased hub style development within a connected hierarchy of links associated with the existing open sports space, retained academic buildings. A core element is the provision of a workable methodology to carry out the master plan proposals in a way that will not interrupt the smooth day to day running of the school.

The relationship of the school campus to the A19 to the North, will remain essentially the same. Long term improvements to free-flowing vehicular movements will come from improved traffic management and education on sustainable transport options for staff and pupils.

## 5.2 Key Features

During the master plan process several alternative layouts have been considered. However, the key site features remain constant and provide the basis for any design these are:

1. Existing accesses to the site.
2. Investigating improved access to the site.
3. Protected trees.
4. Plateaued site topography.
5. Existing development to the North, East and West of the site.
6. River Ouse, Wash Lands and Flood Barrier to the South.
7. Eight Grade II Listed Buildings and the defined Conservation Area.
8. The existing Public Right of Way through the site.
9. Retained right of way to existing pumping station.
10. Area for temporary decant and contractor compound/access being on the land immediately west of south campus and north of the flood barrier. As used recently by the environment agency.

## 5.3 Design Principles

The design principles have been established using the existing landscape and sports field capacity, existing development, and site topography. The master plan seeks to mitigate the anticipated minimal impact of the proposed redevelopment on the site, its landscape and

openness to the South while at the same time creating high quality academic facilities with excellent amenity.

The design principles therefore include the following:

- Development of a range of high-quality campus buildings, including music and performing arts hub, sports hub, enhanced STEAM hub, replacement academic buildings.
- Creation of new all-weather synthetic pitches and improvement of existing sports pitches and landscape buffers.
- Provision of improved ancillary facilities integral to the school including improved dining and medical facilities.
- Review access to the south campus below the PROW, including provision of much needed clear emergency access.
- Development of a landscape and all year-round sports pitch strategy creating a suitable sports hub, while maintaining the current open aspect enjoyed from the south bank of the River Ouse.
- Review pedestrian permeability between North and south Campus' currently served by a single footbridge over the PROW.
- Working with the local community to provide beneficial shared facilities.
- Creation of a safe environment ensuring that open space and footpath links within campus are overlooked and better connected.
- Address concerns brought about by the covid pandemic, that will ensure compliance with measures and provide a safe environment for all in the future.

## 5.4 Proposed Master plan

1. The proposed master plan provides three distinct development blocks referred to as hubs within the existing campus boundary. Which will require a phased development approach over a 15-20 year period, incorporating a system of decant, demolition and replacement. Particularly to the southeast cluster and the northwest corner of the north campus.
2. Retaining green corridors as arterial pedestrian links within the campus, connecting the 3 clusters of development. With a dedicated link connecting the north and south campuses to supplement the existing bridge link.
3. The current master plan is essentially a redevelopment of 2 identified key areas and an extension to an existing group of buildings, to form a new STEAM hub. The proposal has been informed by the existing constraints of the site and the low quality of some of the existing facilities making them ripe for redevelopment and expansion.
4. As the school will continue to operate throughout development elements, space is allocated for decant of departments to temporary facilities, contractors' compound, haul roads etc. This will require the use of the site immediately north of the flood barrier.



5. The topography and makeup of the site has largely dictated the location of the blocks, however in the case of the proposed new dining facility this is proposed to utilise a part of the site which will in effect be replaced by a better facility within the south campus sports hub. It will also facilitate easier access for deliveries and complement the existing smaller Clifton Dining facility to create a 'Dining & Hospitality Hub'. This new facility overcomes a current issue over capacity for the existing dining facility to the east of the north campus. Freeing up an area of the existing central core to be redeveloped into academic use.
6. The new dining hub will form a useful, functional multipurpose space for performances, exams, provision of refreshments during first XV rugby, cricket complementing the much-needed larger dining facility.



Aspirational images for a new dining hub

7. Consolidating existing STEM facilities located in and around the 2018 Pascal building, with a new purpose-built arts and technology department. With its modern take on a north light roof for clean light in the studios. Its multiple pitched roofs also reflect adjacent residential massing to the east boundary. Predominantly single storey the varied roof line will break up the massing and create visual interest rather than obtrusive impact of the surroundings.



Aspiration images for new art and technology extension as part of a 'STEAM' Hub Consolidation

8. Music, Performing Arts and Sports hubs will share the southern campus and involve the redevelopment of the Former Queen Anne's Grammar School cluster, except that part

which is listed. The synthetic sport pitches will remain and improve as part of the proposed sports hub. Together the proposed elements form a major undertaking for the site, which will require decants, temporary accommodation and a sizeable contractor's compound. All of which will need to be accommodated within the south campus and in particular the areas shown as '7' on the on the existing sports facilities plan in the appendices.



Proposed purpose built performing arts and music hub aspirations.

## 5.5 Building Typology

The school has a good track record in providing new building stock which addresses the earlier fenestrations in a modern vernacular way. It is envisaged that the proposed campus buildings will carry on this tradition. Employing new technologies to reflect the forward-thinking school ethos. Creating landmark opportunities within the school site that enhance the long-distance views and enjoyment of passers-by as well as the students and staff who will undoubtedly utilise them to their fullest. As recently demonstrated by the 2018 completion of the Pascal Building. There is a new visual language shared between the 3 school entrances, swimming pool and pascal building, which the new proposals will continue to draw upon.



## 5.6 Landscape & Greenspaces

The increased height of the flood defences now create a defined physical and visual buffer between the school and riverside, where it had previously been more open below the south cluster of buildings. The area of the school shown as 4,5 & 6 on drawing SP06-001 remain divided by the heightened flood barrier. In terms of views from the riverside, this area is well landscaped with trees and hedges atop an incline from riverside path to sports playing fields. It is important to note therefore that the school is far less prominent today than it would have been in the past.



Master plan proposals further add to the landscape buffer with additional structure planting, making best use of the land immediately north of the flood barrier, providing modern sports facilities and improved sports pitches. While the area in the southwest of the campus will remain as sports practice pitches, with those either side of the boathouse being sacrificial at times when that area is utilised as washland.

As part of the improved facilities the school intends to install new synthetic pitches and improve the existing hockey pitch with an all-weather construction. The new structure planting and juxta position of new sports hub buildings will reduce any impact on neighbouring residential properties that the synthetic pitches may bring through regular use.

## **5.7 Biodiverse - Sustainable Development**

The hub type development has been designed with sustainable features at the core of the design. The site itself is accessible by modes of transport other than the car with good public transport links and cycle and core paths routes. In addition, the proposed scheme will include enhanced opportunities for biodiversity within its landscape fabric. Further, each element of the newly developed campus will employ sustainable methods of construction and materials.

There are opportunities to reinforce the boundaries with structure planting, which in turn will provide biodiverse habitats and structure to the site external boundaries and internal divisional boundaries too.

## 6 SUMMARY

The school functions efficiently despite its various constraints. There is, however, a pressing need to address current building inadequacies, space constraints and access over the coming years. To this end a high-level 15-year master plan has been devised.

Development potential for the existing campus is limited by size of the site. Therefore, master planning is always going to be subject to array of existing constraints. For the master plan to proceed within a legitimate plan period, and within a safe development area, it is essential that no further constraints are placed upon the site. City of York Council proposals to amend the green belt boundary will have a significant stifling effect on the school's future and its ability to contribute not only to education but also its contribution to the local economy.

The master plan deals with the historic elements, flood risk and connections within the campus. With good planning and 'room to move', these constraints can be overcome if the school is not further constrained in its approach to improve and redevelop existing facilities and estate.

The conclusion is clear, the ability to make use of the entire site north of the flood barrier is paramount to the future development of the hubs, by allowing decant space, and expansion of the sports, music, performing arts facilities along with new improved all weather pitches.



## **7 APPENDICES**

- 7.1 SP06-001 Existing Sports Facilities Plan**
- 7.2 SP06-002 Listed Buildings & Conservation Area Plan**
- 7.3 SP06-003 Energy Efficiency (EPC's) Estate Plan**
- 7.4 SP06-004 Building Quality Index**
- 7.5 SP06-005 Proposed Draft Master Plan**
- 7.6 SP06-006 Proposed Greenbelt Boundary**

**From:** [REDACTED]  
**Sent:** 06 July 2021 11:43  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 205578  
**Attachments:** St\_Peters\_School\_York\_Local\_Plan\_Reps\_COMPOSITE\_SUBMISSION.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Green Belt Addendum January 2021 Annex 3 Inner Boundary Part 1 Sections 1 to 4 (EX/CYC/59c)



## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** No, I do not consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:**

**Please justify why you do not consider the document to be legally compliant:** We make no representations on this topic

---

## Your comments: Duty to cooperate

**Do you consider the document to comply with the Duty to Cooperate?:** No, I do not consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:**

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:** We make no representations on this aspect

---

## Your comments: Whether the document is 'sound'

**Do you consider the document to be 'sound'?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Land south of the southern School buildings is unjustifiably proposed to be within green belt despite it serving no green belt purpose:-

- The land is not countryside. It is part of a busy and evolving campus of a large, successful school where buildings and sports facilities need to meet changing demands such as increased School role numbers, energy conservation standards and artificial sports pitches provision
- Green belt designation to check unrestricted sprawl is not relevant to this circumstance. The School's development is confined within its boundaries. The major flood bank to the south undoubtedly performs this function in this locality.
- Development on the School campus would not affect the setting and special character of the city. The river corridor to the south performs this function, particularly giving views towards the Minster. School development would be within its site confines and be of height and massing appropriate to its location. Draft policy ED6 and text supports school provision and expansion. NPPF para 85 requires Councils to cater for meeting identified requirements for sustainable development when defining boundaries to the green belt. There is no Council evidence base for the School's requirements so that the proposed green belt boundary is contrary to para 85. Our submission provides this evidence. The document does not pass any of the tests of soundness

---

## Your comments: Necessary changes

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** The green belt boundary should be along the northern edge of the flood bank to the south of the School's southern buildings and between the sports pitches on the western edge. See plan E attached to the planning statement.

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** This issue is of major importance to the future of a high standard and successful school which needs to be able to utilise its campus for educational purposes, as schools in the main urban area able able to do

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

St\_Peters\_School\_York\_Local\_Plan\_Reps\_COMPOSITE\_SUBMISSION.pdf

---



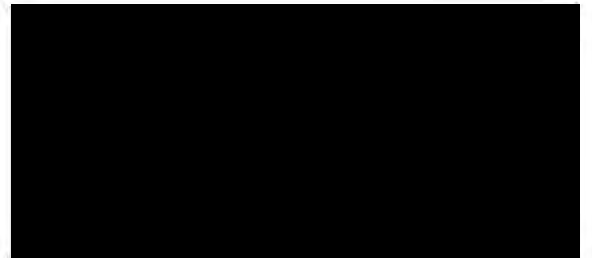
CITY OF YORK COUNCIL

EMERGING LOCAL PLAN  
REGULATION 19 CONSULTATION

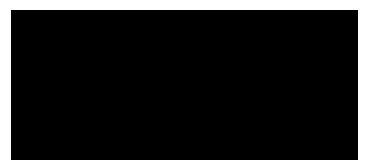
LOCAL PLAN MODIFICATIONS AND EVIDENCE  
BASE CONSULTATION

JULY 2021

Representations on behalf of  
St Peter's School, Clifton,  
York YO30 6AB



CITY OF YORK COUNCIL  
EMERGING LOCAL PLAN REGULATION 19 PUBLIC CONSULTATION  
LOCAL PLAN MODIFICATIONS AND EVIDENCE BASE JULY 2021  
REPRESENTATIONS ON BEHALF OF ST PETER'S SCHOOL YORK YO30 6AB





## EXECUTIVE SUMMARY

The Basis of The Representations: Soundness and Legal Compliance

## CONTENTS

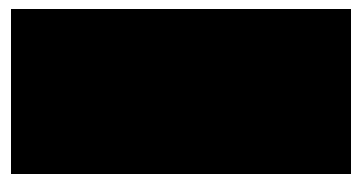
1. Introduction
2. The nature of educational campuses
3. St Peter's School
4. Planning policy context
5. Modifications proposed to Green Belt boundaries in emerging local plan
6. Detail of Council's Green Belt boundary proposals for St Peter's School
7. Proposed amendments to inner boundary Section 3 Boundaries 8 to 13
8. Conclusion

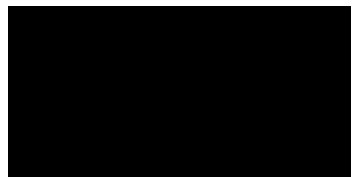
### Attachments:

- A Modifications to Green Belt Boundary south of the School proposed June 2019 PM30
- B Modifications to Green Belt Boundary south of the School proposed April 2021 PM 75
- C Inner Boundary Section 3 in the vicinity of St Peter's, document EX/CYC/50 April 2021
- D Modifications to Green Belt Boundary south of Joseph Rowntree Secondary School proposed April 2021 PM 81

## APPENDICES

1. St Peter's School Site Development Justification: Director of Operations
2. St Peter's School 10 year Master Plan: Appraisal of school building stock and the need to replace and/or augment provision: McNeil, Beechey, O'Neill Architects







## EXECUTIVE SUMMARY

### The Basis of The Representations: Soundness and Legal Compliance

- I. These representations conclude that:
- The Emerging Local Plan is unsound in relation the inner green belt boundary proposed around existing school buildings on the southern side of the campus of St Peter's School, York.

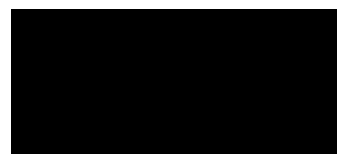
Changes required are to:

- Use as the green belt boundary, the obvious and well defined boundary provided by the large 4m high flood defence barrier which runs south-east to north-west, south of the built campus but bisects the western sports pitches.

See plan 6 attached.

Key diagram EX/CYC/46 is therefore unsound in this respect.

- On the matter of Legal Compliance, we make no representations on this aspect.
  - On the matter of Duty to Co-operate, we make no representations on this aspect.
- II. The proposed green belt boundary around St Peter's School southern campus does not correctly interpret and apply the requirements of NPPF 2012 para 85 in that the City Council has:-
- Not ensured consistency with the Local Plan strategy for meeting identified and known requirements for sustainable development
  - Not satisfied themselves that the Green Belt boundary will not need to be altered at the end of the development plan period
  - Not defined boundaries clearly, using physical features that are readily recognisable and likely to be permanent and



- Included land which is not necessary to keep permanently open

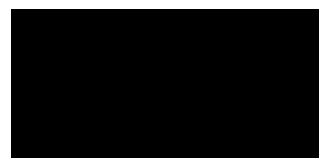
III. These representations are made in relation to Local Plan documents EX/CYC/59, EX/CYC/59c, EX/CYC/59h and EX/CYC/46. They concern the flawed justification for the inner boundary of the green belt proposed by the Council for two obvious matters which undermine the soundness of the plan unless rectified: -

- A. The Council has disregarded its obligation to make an evidence based assessment for meeting identified requirements for sustainable development for the School within the plan period, prior to proposing inner boundaries to the green belt. Its draft policies support educational institutions at each age level in Section 7 of the Submission Local Plan, and its statement in para 7.1 says:

*“Building on recent years’ investment in the city’s education 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”*

The School is certainly an exceptionally strong educational facility and is going from strength to strength. Despite this, the development requirements of the School have not been sought by the Council. Nonetheless, they are contained in this evidence.

- B. The Council’s proposed green belt boundary hugs the southern edge of the buildings in the lower campus, around buildings and voids between buildings, like a doily. This is despite the fact that many of the buildings are inefficient and no longer fit for purpose and the likely replacements are unlikely to be in the exact same position due to the need for the school to function throughout building projects, thus replacements will need to be on an alternative site within the campus.

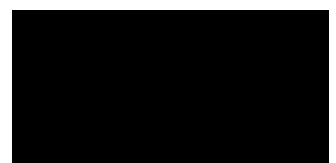




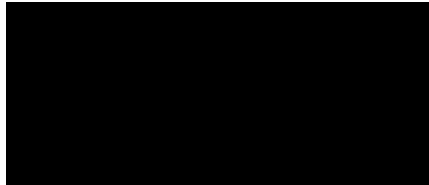
A green belt boundary is required to use physical features that are readily recognisable and likely to be permanent, the current proposal demonstrably fails to achieve this. Instead, a strong and recognisable boundary is presented by the adjacent 4m high flood prevention barrier which is definitely permanent and meets the requirements for designating green belt boundaries.

- IV. For the School, Document EX/CYC/59c INNER BOUNDARY SECTION 3, boundaries 8 to 12 are proposed, (attached plan C). Modification PM75 is relevant (attached plan B. This plan also shows the previous boundary proposed by the Council in June 2019 which excluded hard surface pitches from the green belt. No logical reason has even been provided by the Council for its change of position since 2019.
- V. In terms of the purposes of green belt, the campus is patently not countryside, it is a busy institution with over 1200 students and buildings and sports pitches to serve the School community. It is an active business and, in common with other such educational institutions, it needs to use its site for the benefit of the School.

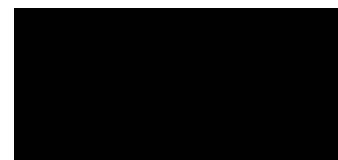
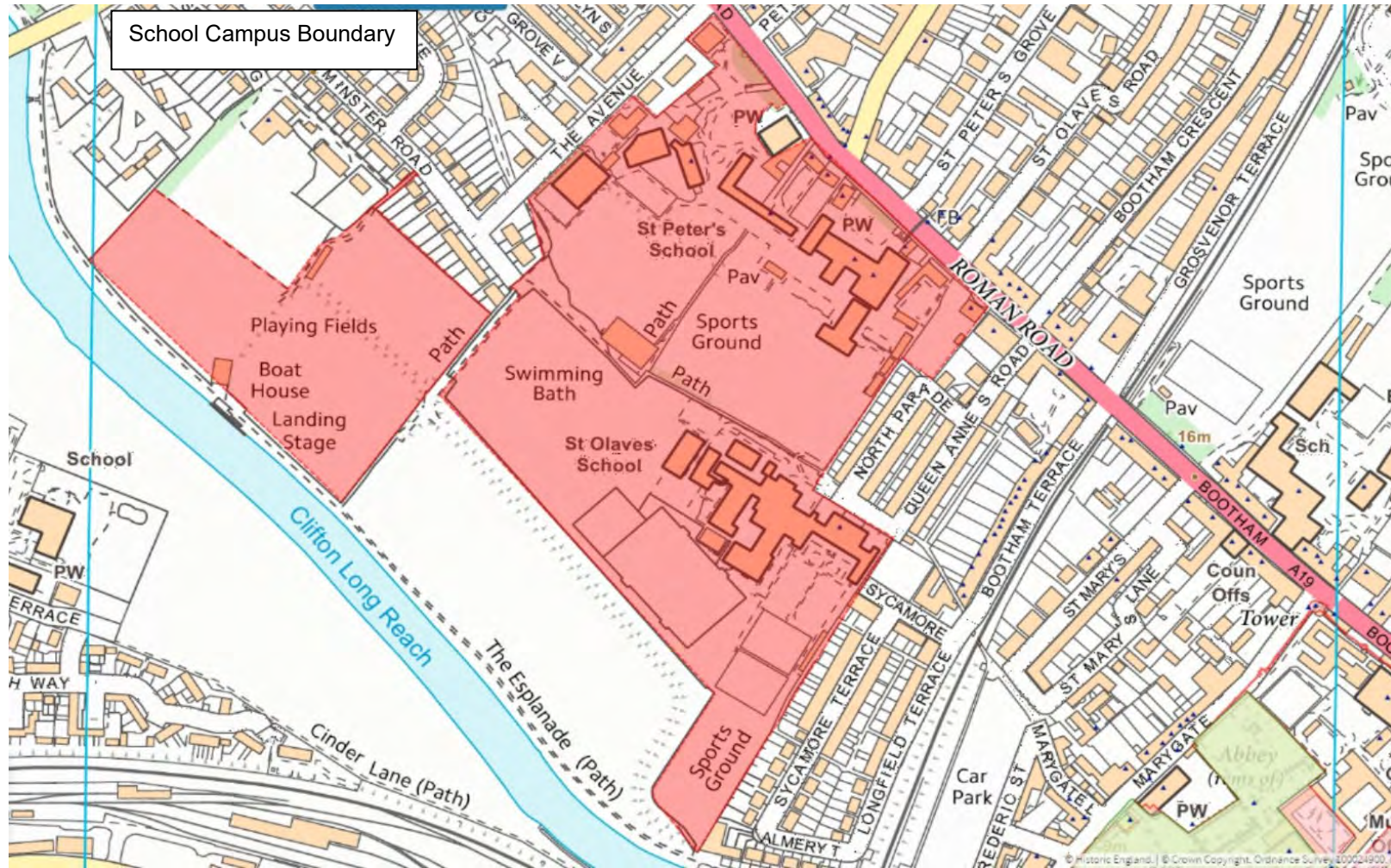
Due to the significant impact of the flood prevention barrier, it serves the purpose of preventing intrusion into countryside effectively. The School grounds are not intended for this purpose, and do not need to be. The river corridor protects the character of the historic city which 1960s former Council buildings on the lower campus are not able to do.



School Campus Boundary -Satellite View







## 1. THE BASIS OF THE REPRESENTATIONS

1.1 These representations are made in relation to Local Plan documents EX/CYC/59, EX/CYC/59c, EX/CYC/59h and EX/CYC/46. They concern the proposed modification of the proposed inner boundary Green Belt within the campus of St Peter's School, Clifton, York YO30 6AB. The Council's latest proposed modification PM75 is contained within attachment B at the end of this statement. The proposed Green Belt boundary encloses the built footprint of the southern school buildings in an illogical 'doily effect'.

1.2 Our assertion is that the boundary does not correctly interpret the requirements of NPPF 2012 para 85 in that the City Council has:-

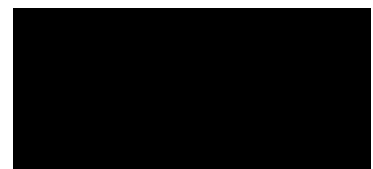
- Not ensured consistency with the Local Plan strategy for meeting identified requirements for sustainable development
- Included land which it is unnecessary to keep permanently open
- Not satisfied themselves that the Green Belt boundary will not need to be altered at the end of the development plan period and
- Not defined boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

## 2. THE NATURE OF EDUCATIONAL CAMPUSES

2.1 A school, in line with further and higher education institutions, is not a static entity. Its activities and its estate evolve over the years and decades from aspects such as:

- Increased demand for school places requiring increased capacity
- Requirements of the changing curriculum
- Buildings have become no longer fit for purpose from physical condition, capacity, location etc
- Running costs: energy efficiency, availability of natural lighting, natural ventilation, insulation etc

2.2 A school therefore needs space to meet the changing demands on its estate. To replace a building requires decant space such as a site for the new building and later demolition of that being replaced. New capacity needs space to locate a building. Any new



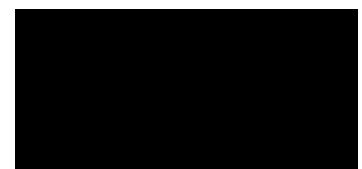


development needs wide clearances around the construction site to allow the school to function safely during the construction period. The construction site needs a contractors' compound and storage area.

- 2.3 For all of these reasons a school needs space. To remove part of its existing site and place it into Green Belt inhibits its abilities to meet its needs for sustainable development. This is particularly inequitable as other city schools in urban locations have no such constraints.

### 3. ST PETER'S SCHOOL

- 3.1 St Peter's is a co-educational independent school with a very long history, it is the oldest school in England outside of Kent. It comprises three elements, the senior, preparatory and pre-preparatory sections which are all on one campus. The 17.4ha site is located on the northern bank of the River Ouse, with a high flood bank running east-west to the south of the campus. The site is sub-divided by an east-west public right of way with the senior school, St Peter's, and pre-preparatory school, Clifton, to the north and the preparatory, St Olave's school to the south. A range of sports pitches lay in the northern section, and on the south and west sides of the southern section. The School caters for over 1200 day and boarding students; 48% currently have a home address within the City Council boundary and 91% have a home address within 25 km of the site. It is therefore an important educational facility for a significant number of families within the administrative area of the City.
- 3.2 The School is extremely popular and over-subscribed. It offers a wide curriculum and many out of classroom activities. It is also involved in the local community such as the Minster choir being based at the School, and sports activities off site. It joins a group of high quality schools in the city that contribute to the Council's objective of creating world class education in the city. The strong sports ethic results in the pitches being heavily used and as such artificial pitches are valuable such that there is an aspiration to construct additional facilities.
- 3.3 The built heritage of the School means that conserving listed buildings is part of its role in retaining the character of the historic city. When the St Peter's took over the redundant former Council owned Queen Anne's Girls Grammar School, it inherited the



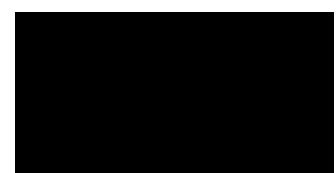
listed Brierley building which was the original school building which is grade II listed. At the time the City Council was marketing the school for redevelopment, but St Peter's acquisition of it ensured that it remained in education use, thereby facilitating its original use. This has given the building a new occupier for the use for which it was designed, and which would otherwise have been lost.

- 3.4 Appendix 1 provides an overview by the School of its history, character and strategic vision. Its vision is directed towards improving the built and sports facilities so that they match up to changing requirements of the curriculum, the needs of the student community and to meet new agendas such as energy efficiency and sustainability.
- 3.5 Appendix 2 provides information on the nature and condition of St Peter's estate, identifying constraints. The senior school is located within the Clifton conservation area and a significant proportion of the buildings are listed, so that the historic context inhibits the ability to make changes to the estate, (Appendix 2 plan 2). The preparatory school was built as Queen Anne Girls Grammar School but declared redundant and purchased by St Peter's in 2001. It has a single listed building but the majority of its buildings are not of high quality and do not meet current standards of energy efficiency or space efficiency. (Appendix 2 plans 3 and 4.)
- 3.6 The appendix sets out a high-level master plan to carry out necessary improvements and additions to meet the challenges that the School faces.

#### 4. PLANNING POLICY CONTEXT

- 4.1 The emerging Local Plan Submission Version May 2018 addresses education in Section 7. It states at para 7.1:

*"Building on recent years' investment in the city's education 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."*





## 4.2 Policy ED6 states:

*“The provision of sufficient modern education facilities for the delivery of pre-school, primary and secondary school education to meet an identified need and address deficiencies in existing facilities will be facilitated. New and enhanced education facilities will be permitted if they:*

- i. Are in locations that are accessible by sustainable means of transport from the communities they are intending to serve and not have a significant adverse impact on the amenities of neighbouring property;*
- ii. Have sufficient and appropriate playing field provision or take opportunities to deliver additional playing fields for existing schools identified as having a deficiency, as part of new development immediately adjacent to or near the schools; and*
- iii. Provide community access, through good design and modifications, to their facilities in areas where there are deficiencies of community leisure and sports facilities.”*

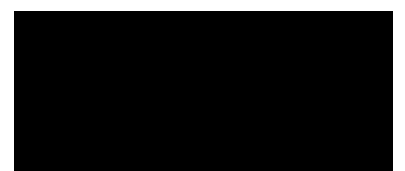
## 4.3 Para 7.19 states:

*“Providing sufficient and suitably modern accommodation will help to increase educational attainment to equip communities and local people with the right skills for the jobs available, both now and in the future. As such proposals for additional educational facilities will be welcomed by the Council if requirements are identified following assessment of need, and for academies and maintained schools if their development reflects the aspirations of local communities.”*

## 4.4 The policy guidance in the NPPF supports school provision. It states at Para 72, in the section on Promoting Healthy Communities:

*“The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive approach to meeting this requirement, and to development that will widen choice in education. They should:*

- give great weight to the need to create, expand or alter schools; and*

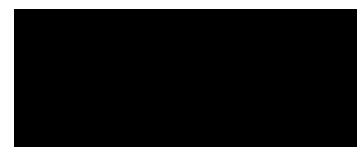


- *work with school promoters to identify and resolve key planning issues before applications are submitted.”*

## 5. MODIFICATIONS PROPOSED TO GREEN BELT BOUNDARIES

- 5.1 The topic paper TP1 is titled Approach to defining York's Green Belt ADDENDUM January 2021 (EX/CYC/59). Section 4 addressed the local plan strategy and development needs, in compliance with NPPF 2012 para 85 which requires local councils to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development. Paras. 4.47–4.50 (page 21) addresses the need of development related to education. However, this is a high level assessment of the need deals solely with additional pupil places and does not refer to existing schools' need to update or expand their estate.
- 5.2 Section 7: Methodology: Channelling Development to Urban Areas is again high level related to educational provision, Paras. 7.22-7.24, (page 57). Section 10: Enduring Boundaries and Safeguarding addressed educational provision again at high level in Paras. 10.24 and 10.25.
- 5.3 Thus, despite a silence in the modified documents subject to this public consultation on the requirements of existing schools to be able to expand and remodel as their needs define, and despite policy ED6 supporting the needs of schools to carry out developments, the Council is proposing exceptionally tight Green Belt boundaries around existing school buildings where schools are co-located with the general extent of the Green Belt. Other schools with an urban location have no such constraints on their scope to carry out developments.
- 5.4 The secondary schools which are also affected by this unjustified at Joseph Rowntree and St Peter's, primary schools so affected are Burton Stone, Elvington, Heslington, Poppleton, St Barnabas and Stockton-on-Forest out of a total of 67 schools, including 5 independent schools, plus York College, a VI Form and Further Education College. Local plan modification proposals for Joseph Rowntree School and St Peter's are included in attachments D and B at the end of this statement.

## 6. DETAIL OF GREEN BELT BOUNDARY PROPOSALS FOR ST PETER'S SCHOOL





6.1 The emerging local plan has in all versions shown the whole of the northern part of the school site allocated yellow for education, including the pitches. For the southern part of the school site, the proposed designations have been altered several times.

- In the publication version June 2018 the Green Belt bounded the buildings and a section of the sports grounds south to the flood bank. The pitches on the eastern boundary and those to the north-west were shown as existing open space within the Green Belt, (PM 30, attachment A). The justification was:

*“to represent completed planning permissions. Although the changes to the layout of the sports provision at St Peter's School are deemed appropriate uses within the Green Belt they may have an urbanising influence on the area which needs to be reflected.”*

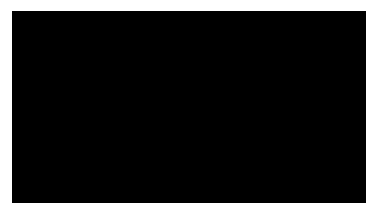
- This was modified in the Proposed Modifications June 2019 PM30 to utilise part of the flood bank as a southern Green Belt boundary so that the all weather pitch and tennis courts were included in the education allocation. The schedule stated:

*“Although the changes to the layout of the sports pitches at St Peter's School are deemed appropriate uses within the Green Belt they may have an urbanising influence in the area which needs to be reflected.”* (page 32) (attachment A).

- The current Proposed Modifications April 2021 PM75 shows the proposed Green Belt boundary now tightly enclosing the school buildings so that no open land is excluded from Green Belt. The sports pitches are shown as existing open space within Green Belt, (page 49) (Attachment B).

6.2 Document EX/CYC/59c Topic Paper 1 Green Belt Addendum January 2021 Annex 3 Inner Boundary Part 1 Sections 1-4 considers St Peter's School in Section 3 Boundary 8 to 13. This is shown on Inner Boundary Section 3 plan (attachment C), and in detail in the schedule pages 199 to 240. The justification for the tight Green Belt enclosure of the southern school buildings is given as:

- Purpose 4 Preserving the setting and special character of historic towns
- Purpose 1 Checking unrestricted sprawl
- Purpose 3 Safeguarding the countryside from encroachment



## 7. ASSESSMENT GREEN BELT PURPOSES

### 7.1 Purpose 3

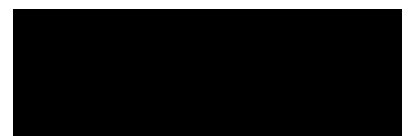
The basic premise of the Council's case is that the playing fields on the southern side of the school campus are part of the "countryside". This is plainly wrong to even the most cursory visitor. To the contrary, this is an active, busy school campus with facilities for its 1217 students. With the School's reputation on sports achievements their facilities are well used. This requires lighting to be installed on the all-weather pitch and a second illuminated pitch providing. Illuminated pitches are considered an urbanising feature and not appropriate in Green Belt.

### 7.2 Purpose 1

Educational development on an existing school site cannot be rationally considered as threatening "unrestricted urban sprawl". This is a defined site with a specific use. In addition, there is a circa 4m high flood bank to the south of the school campus, which is circa 15m wide at its base. It is difficult to imagine a more dominant and permanent Green Belt boundary, in contrast to the weak and illogical boundary proposed by the Council.

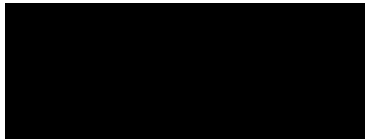
### 7.3 Purpose 4

Preserving the setting and special character of historic towns is acknowledged as a strong factor in defining the inner boundaries of the city's Green Belt. However, the River Ouse corridor to the south of the flood bank fulfils this function in a powerful way. Views into the city centre from the river corridor are uninterrupted by the southern part of the School campus. Changes to the campus would be "behind" the flood bank and would be seen, if at all, against the setting of the raising ground up to the listed buildings on the norther edge of the site. They would be of low impact not damaging the setting and special character of the city.



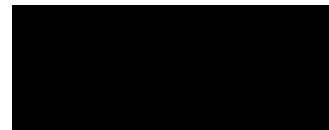


Photography Viewpoints



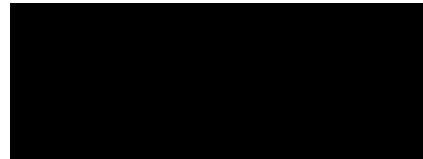


Photograph 1



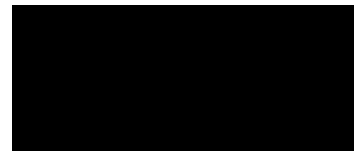


Photograph 2





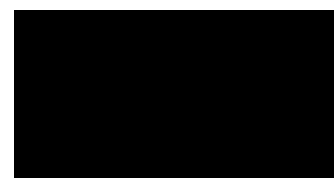
Photograph 3





7.4 Para 85 of the NPPF 2012 advises on the defining of Green Belt boundaries. This advice is not followed in the definition of a proposed boundary around the School.

- **Ensuring consistency with the Local Plan strategy:** The proposed boundary is drawn tightly around the southern campus' building footprint, removing development potential, even for additional all weather pitches with lighting. This has taken no account of the legitimate and known needs of the School to replace and augment their current built estate nor the need for decant space to develop additional floorspace yet keep the School operational throughout. The Local Plan policy ED6 supports new and enhanced educational facilities so that there is inconsistency with the Local Plan strategy.
- **Ensure permanence in the boundaries proposed:** The Council's boundary modifications have proposed a 2-tier approach to school campuses in that those adjacent to the Green Belt are proposed to have their undeveloped campus space washed over by Green Belt, whilst schools wholly within the urban area have their whole campus allocated for educational use. This is inconsistent given that all schools should have the same acknowledgement of their need to replace and/or augment their building provision over time. The proposed Green Belt boundary unreasonably inhibits the scope of these Green Belt schools to cater for legitimate growth and enhancement, thus pressure to revise the Green Belt boundaries to allow such growth will become immediate. For reasons set out in the appendices to this statement – the need for such development is known and undisposed, which renders the approach of the Council unsound and unjustified. This threatens the permanence of the boundaries.
- **Define boundaries clearly using physical features that are readily recognisable and likely to be permanent:** The eastern section of the southern boundary of St Peter's estate runs along the northern edge of the Lower Bootham flood defences. This flood bank has been recently raised and is now 4m high and 15m wide at its base. This is an exceptionally strong physical feature that is readily recognisable and very likely to be permanent. In contrast, the 'doily effect' of the Council's proposed boundary around the current building footprint is not permanent since buildings can be extended or demolished and replaced over the plan period. The amendments to Part 7 class M of the GPDO (2015) which

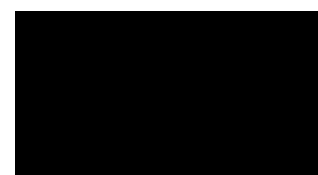






## ATTACHMENTS

- A CYC Modifications to Green Belt Boundary south of the School June 2019 PM30
- B CYC Modifications to Green Belt Boundary south of the School April 2021 PM 75
- C Inner Boundary Section 3 in document EX/CYC/50
- D Modifications to Green Belt Boundary east of Joseph Rowntree Secondary School April 2021 PM
- E Green Belt boundary proposed by St Peter's School



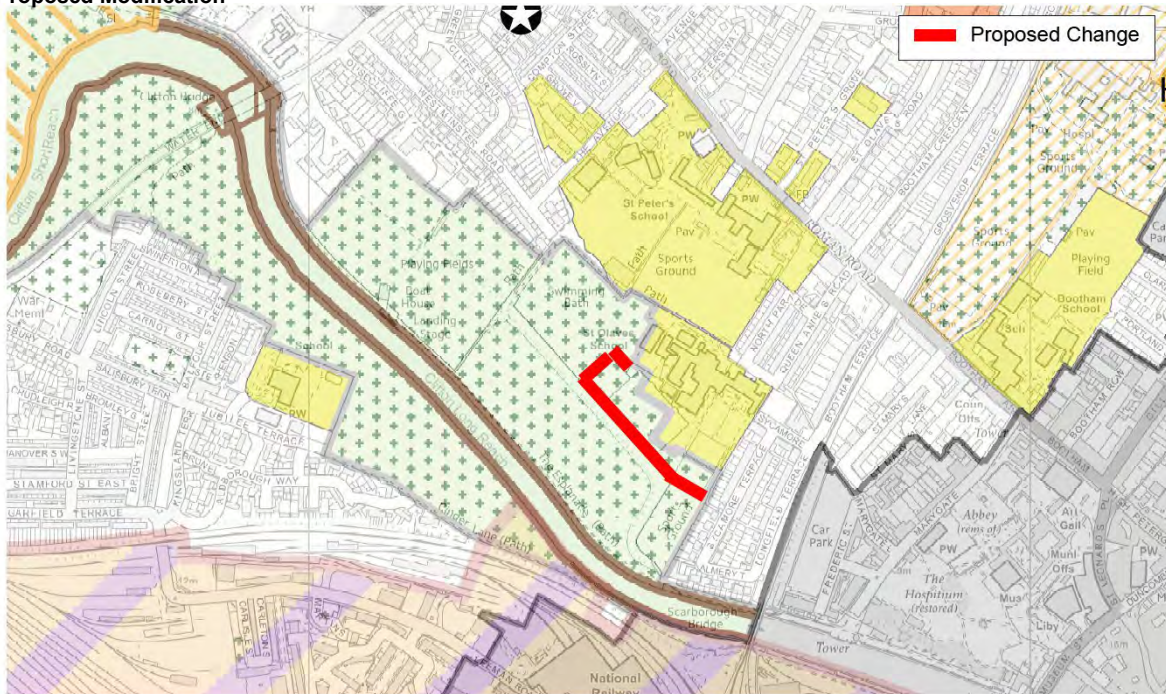
ATTACHMENT A

City of York Local Plan Proposed Modifications (June 2019)

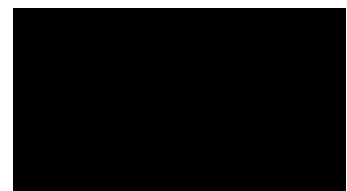
PM30: Rear of St Olaves and St Peters School Policies map boundary (2018)



Proposed Modification



See key on page 55





















City of York Local Plan Proposed Modifications (June 2019)

Local Plan Publication Draft Policies Map February 2018 Key

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

City of York Local Plan Proposed Modifications (June 2019)


Modification Reference Number	Plan Location	Proposed Modification	Reason for Changes
<b>PM29 -</b> Policies Map Green Belt Change – Moor Lane, Woodthorpe	Policies Map South –  (See map extract on page 56 of this document)	Proposed detailed inner Green Belt boundary modification – it is proposed that the boundary should follow the carriageway to the south of Moor Lane, as opposed to the north side of the road, as it is presented on the submitted policies map.	Consistency:  The methodology indicates that where the metalled surfaces of roads are in proximity to urban uses they should be considered to form part of the built up area.  See justification as set out in TP1 – Annex 3, Inner Boundary Section 1 Boundary 2.
<b>PM30 -</b> Policies Map Green Belt Change – rear of St Olaves and St Peters School.	Policies Map North –  (See map extract on page 57 of this document)	Proposed detailed inner Green Belt boundary modification – it is proposed that the boundary should follow the existing built sports provision in preference to the current line which no longer matches physical features on the ground.	To represent changes since the boundary was drafted and to reflect completed planning permission.  Although the changes to the layout of the sports provision at St Peters School are deemed appropriate uses within the Green Belt they may have an urbanising influence on the area which needs to be reflected.
Modification Reference Number	Plan Location	Proposed Modification	Reason for Changes
			The proposed line offers a more robust boundary to the Green Belt in this location with a greater degree of permanence being offered. The line currently presented on the policies map no longer relates to any physical structures.  See justification as set out in TP1 Addendum – Annex 3, Inner Boundary Section 3 Boundary 9,

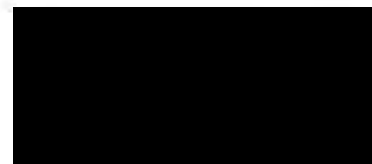


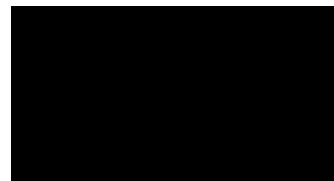


ATTACHMENT B

City of York Local Plan Proposed Modifications (April 2021)

Modification Ref: PM 75	Proposed Detailed Inner Green Belt Boundary Modification		Evidence base location
	Document location	Name of Area of Change	
	Policies Map North	PM75 St Peters School	TP1 Addendum Annex 3 Section 3 Boundary 9
<p><b>Proposed Modification</b></p>  <p>Reproduced from the Ordnance Survey mapping with the permission of Her Majesty's Stationery Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. City of York Council. Licence No. 1000 20818</p> <p>It is proposed that the green belt boundary should follow the built edge of the school buildings</p>		<p><b>Reason: Consistency with the Green Belt methodology .</b></p>	













Key to Policies Map extracts


**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
-  Nationally Significant Nature Conservation Sites  
(SAC/SPA/RAMSAR/SSSI)
-  Site of Importance to Nature Conservation  
(SINC)
-  Candidate Site of Importance to Nature Conservation  
(Candidate SINC)
-  Local Nature Reserve (LNR)








**Managing Appropriate Development in the Green Belt (Section 10)**

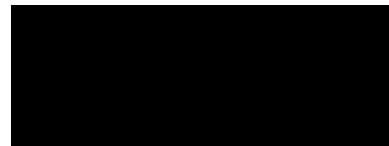
-  Greenbelt

**Waste and Minerals (Section 13)**

-  Household Waste and Recycling Sites

**Transport and Communication (Section 14)**

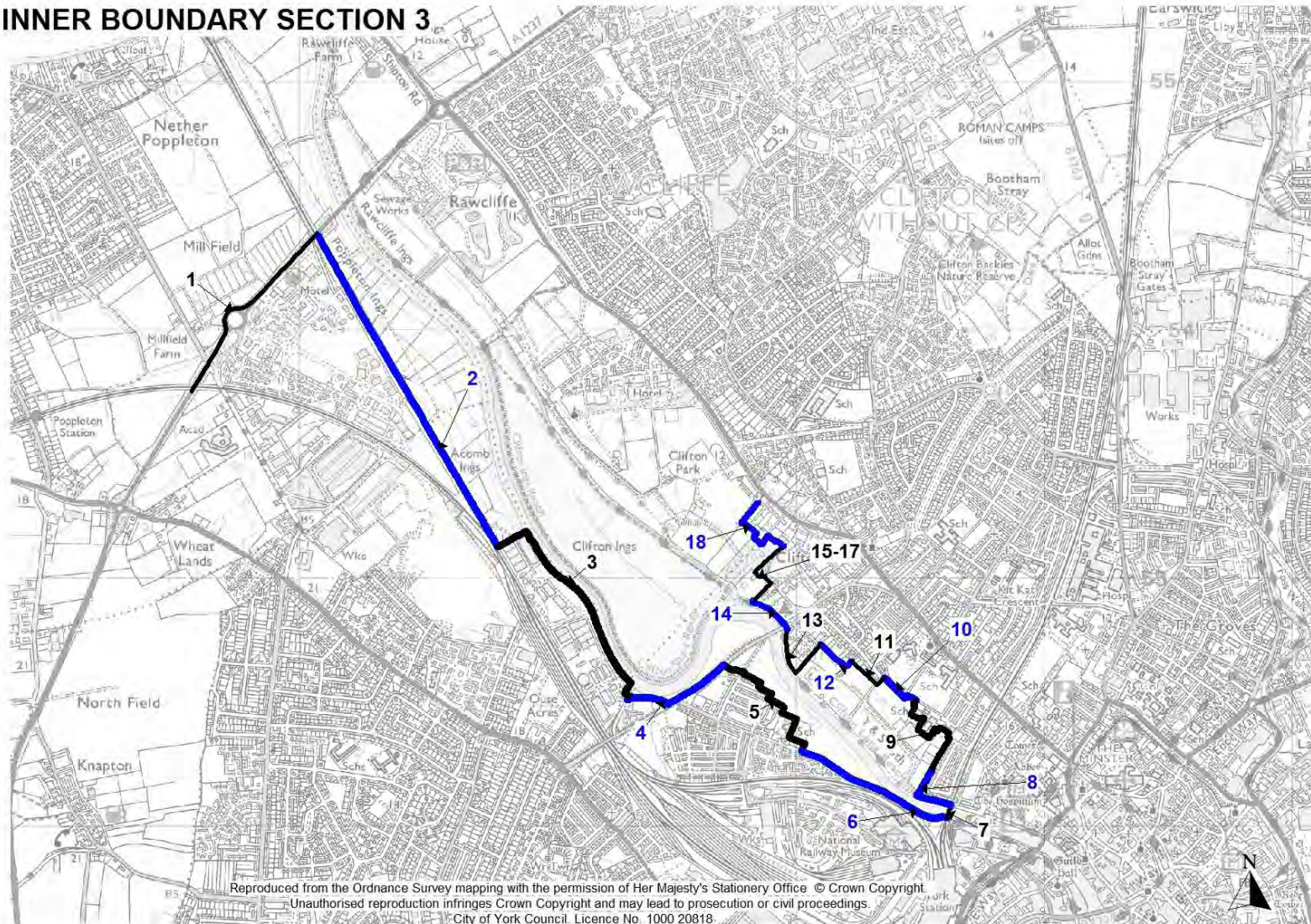
-  Proposed New Railway Stations
-  Existing Park and Ride
-  Existing Park and Ride with Potential for Relocation
-  Existing Park and Ride with Potential for Expansion
-  Potential New Bridge/Enhancement
-  Proposed Roundabout Junction Improvements
-  Proposed Strategic Junction Improvements
-  Land Safeguarded for Potential Future Transport Schemes
-  Strategic Pedestrian/Cycle Corridor Improvements





ATTACHMENT C

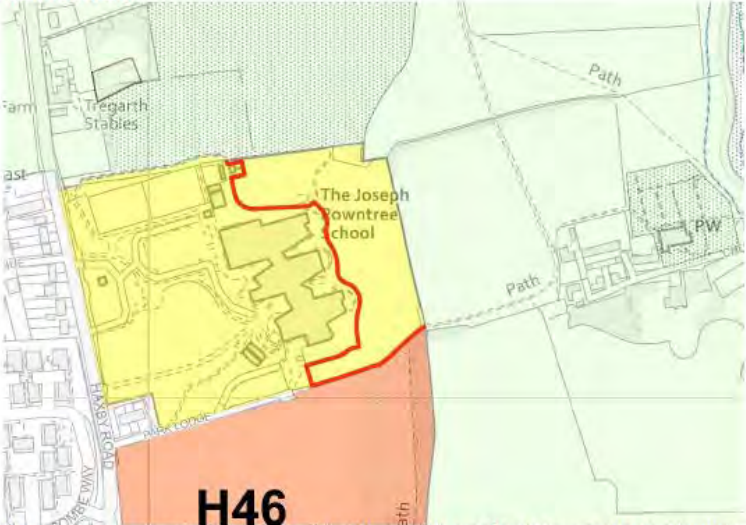
**INNER BOUNDARY SECTION 3**





ATTACHMENT D

**City of York Local Plan Proposed Modifications (April 2021)**

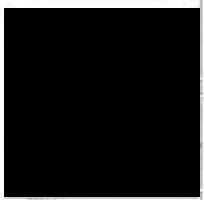
Modification Ref: PM 81	Proposed Detailed Inner Green Belt Boundary Modification		Evidence base location
	Document location	Name of Area of Change	
	Policies Map North	PM81 Joseph Rowntree School	TP1 Addendum Annex 3 Section 5 Boundary 9
<p><b>Proposed Modification</b></p>  <p>Reproduced from the Ordnance Survey mapping with the permission of Her Majesty's Stationery Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. City of York Council. Licence No. 1000 20818</p>			<p><b>Reason: Consistency with the Green Belt methodology</b></p>
<p>It is proposed that the green belt boundary should follow the built edge of the School</p>			



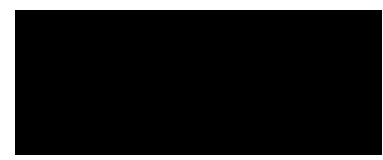


Scale: 1" = 100'

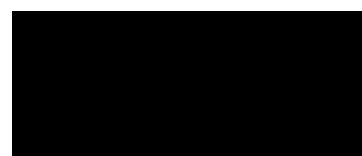
Proposed Boundary of Green Belt



Client			
St Peter's School, York			
Project No.			
Master Plan			
Drawing No.			
Proposed Greenbelt Boundary			
DATE	SCALE	DATE	SCALE
1/2011	1"=100'	1/2011	1"=100'
DESIGNED BY	DRAWN BY	CHECKED BY	DATE
SPD6	006	1	1/11
DWG NO. 006 OF 006			









# St Peter's School YORK

## **The Development of the School Estate to Meeting Educational Objectives**



May 2021



## Contents

<b>A</b>	<b>Introduction</b>	<b>3</b>
	Site History	4
	Numerical Growth	5
<b>B</b>	<b>Strategic Vision</b>	<b>5</b>
<b>C</b>	<b>Challenges and Constraints of the Physical Estate</b>	<b>6</b>
	Listed Buildings	6
	Legacy Buildings	7
	Large Indoor Spaces	8
	Physical Relationship and Relative Location of Buildings	8
	Duplication and Consolidation	9
	Compact Site	9
<b>D</b>	<b>Conclusion</b>	<b>10</b>



## A. Introduction

01. Founded in 627AD in the same year as York Minster, St Peter's School is the oldest school in England outside Kent and the fourth oldest school in the world. Today, the school is a leading independent co-educational day and boarding school for boys and girls aged 2-18. Our shared foundation and close connection with York Minster was strengthened in 2020 when we became their choir school.
02. The 19 hectare school estate is located in Clifton to the north-west of the city. The three schools that now form St Peter's are located on the site, St Peter's 13-18, and St Peter's 2-8 (formerly Clifton School) on the northern side and St Peter's 8-13 (formerly St Olave's School) on the southern side adjacent the river.
03. The School's vision is to prepare pupils for confident, successful and fulfilled adult lives and to have a positive impact on their world. St Peter's School, York is The Sunday Times North Independent Secondary School of the Year 2019. St Peter's School was also named Prep School of the Year and Independent School of the Year at the TES Independent School Awards 2021. The School is consistently oversubscribed and, in the future, would like to be able to accommodate more children who can benefit from all St Peter's has to offer.
04. St Peter's is renowned for academic excellence, with an 85% A\*- B pass rate at A-level and a 92% 9 – 5 pass rate at GCSE in 2019. The School is also renowned for the co-curricular opportunities for all ages and levels, with over 80 different activities available for pupils to enjoy.
05. Music is a particular focus for pupils at St Peter's. As well as the York Minster choristers, we have ensembles, choirs and individual lessons taking place throughout the school. In 2019 our senior Chapel Choir made it to the final of the National Choral Competition at the Royal Festival Hall. Drama is also a popular activity ranging from individual LAMDA classes, to small studio productions and to whole school productions with a cast and crew of hundreds and our assembly halls transformed into fully operational theatres.
06. St Peter's is well known for its achievements in sport, from beginners to elite levels. Our teams have made national finals in all sports, most notably our girls' hockey team who participated in the finals of the national schools' tournament and our rugby team who won the Rosslyn Park Sevens. Sporting talent at St Peter's is home grown and success comes from wide participation in team sports and a dedicated coaching team.
07. Our Help With Fees programme creates opportunities for those who could not otherwise afford an independent school education to join our community and are working with City of York Council to extend our provision to more children in the city. We are represented on the York Early Years Partnership and host an annual Learning Conference for teachers across the region. Staff are engaged in links with local schools, including governance positions and outreach initiatives.



08. St Peter's is a member of the York Independent State School Partnership and works in partnership with the Royal National Children's Springboard Foundation. We share our campus and facilities with community groups such as York City Baths Club, York Hockey Club, Vineyard and Christ the Light Churches, York Musical Society, YEDFAS, MENCAP, and even Glaisdale Hunt Pony Club, to name a few. We also host regular lectures which are available free of charge to the public and provide venues for organisations such as the York Literature Festival, the York Festival of Ideas and the Institute of Physics to host lectures and talks.
09. The Independent Schools Council Economic Impact Report (October 2018) calculated that the school made an annual contribution of £15.7m to the local economy.

### Site History

10. Though founded in 627, the school has been on its current site since 1844. St Olave's School, founded in 1876, joined St Peter's in 1901 and moved from its home in Bootham on to the main school site in 1934. Clifton School joined the St Peter's family in 1994, located on The Avenue across the road from the current school site.



*York Proprietary School 1838-1844*

11. In 2001, the former Queen Anne Girls' Grammar School, which had been operated by the City Council came onto the market. At the time it was being proposed by the Council for redevelopment, however it provided an ideal opportunity for St Peter's to expand its estate, which at the time was highly constrained. Following a successful bid, St Olave's School moved into the majority of the former Grammar School, with St Peter's senior school spreading out and occupying the 3 storey "C Block". Clifton School relocated into the Chilman building which had been purpose built for St Olave's in 1989, and the land on the other side of The Avenue sold to facilitate the purchase of Queen Anne's.



*St Peter's 2-8 in the North West of the campus*

12. The current school is centred on three separate areas of the campus. St Peter's 13-18 on the historic northern part of the campus, St Peter's 2-8 (Formerly Clifton School) in the north-west corner of the site primarily in a mixture of historic and more recent educational buildings, and St Peter's 8-13 (Formerly St Olave's) on the south east of the campus located in the former LEA Girls Grammar School, which itself had expanded into numerous low cost post war additions to the original 1908 listed building before it closed. Three boarding houses are situated nearby on adjacent streets within short walking distance of the main school campus.

## **Numerical Growth**

13. In 1901, the joining of St Olave's school to St Peter's added 70 pupils to the 69 boys recorded at St Peter's in 1900. A century later, in 2001, when the three sections of the school were all brought together on one enlarged site, Clifton school had a roll of 125 pupils aged 3-8, St Olave's 336 pupils aged 8-13 and St Peter's had 492 students aged 13-18, with a grand total aged 3-18 of 953. In the following two decades numbers have steadily increased to 1217 in May 2021 now aged from 2-18 years.
14. Currently 48% of pupils attending the school have a home address within the CYC boundary (58% if you include boarding pupils who live on site). 91% of all pupils have a home address within a 15 mile radius of the School. It follows that the school provides an important educational facility to a significant number of children of families who live within the City Council's administrative area.



## B. Strategic Vision

15. The strategic aim of the school is to further develop the provision of excellent independent education for pupils aged 2-18. The school is a dynamic institution, ever changing and evolving as the curriculum develops, pupil numbers grow and as various requirements demand, for example changing educational needs, legislation, compliance issues or a desire for energy efficiency and a drive for increased sustainability.
16. An innovative and creative campus development master plan has been developed to deliver a comprehensive range of facilities required to facilitate the above and to secure the school into the foreseeable future.
17. The plan addresses obvious shortcomings with the school's current estate as well as ensuring that the site is updated in order to provide high quality academic learning spaces in which to deliver the needs of a contemporary and developing curriculum as well as expanded, state of the art, co-curricular facilities which are increasingly required particularly for sport, music and



*Pascal Building (Maths & Languages) Completed 2018*

performing arts. It also addresses the communal, pastoral and support space requirements ensuring they are more adequately and innovatively met.

18. St Peter's school has a vision to continue to steadily grow day and boarding school numbers up to 1400 from age 2-18 over the next 10 years. This limited growth will enable the school to more adequately meet the need of prospective parents, improve the pupil experience whilst still retaining the distinct St Peter's feel, pastoral model, educational ethos and school culture. It will also ensure that the school is more sustainable economically maximising the use of our assets but without outgrowing the site. Importantly this level of growth is considered to be around the maximum size that the school envisaged growing to. As well as the obvious limitations from the size of its estate, were the school to be any larger then it would risk jeopardising its ethos and the standard and quality of the education that it provides.
19. St Peter's School as custodians of a diverse estate for current and future generations recognises the importance of considering the long-term impact of decisions made today, particularly in relation to the development and use of the site. It is the desire of St Peter's School to be good

stewards of the resources it has, to be efficient with the resources required to run and develop the school, reducing our carbon footprint and minimising the impact we have on the planet. The school also recognises our responsibilities to those that surround us both minimising any negative impact it may have and maximising its potential use and benefit for the wider community.

## C. Challenges and Constraints of the Physical Estate

20. St Peter's has invested heavily in the campus, with over £7m spent on major building projects in the last few years. However, the site still has a number of significant challenges and a strategic plan has therefore been developed in order to overcome many of the constraints and obstacles to the continued success and the implementation of the vision of the school, has been drawn up. The primary challenges constraints are:

### (i) Listed Buildings

21. We are inheritors of a stock of beautiful grade II listed buildings, many of which were built in the early 19<sup>th</sup> Century, which dominate the northern part of the campus bordering the A19. These, along with the original early 20<sup>th</sup> Century Walter Brierley designed Queen Anne's Grammar School building, are however a challenge to maintain, inefficient to run, and also are limited in how they can be developed to be fit for purpose spaces for delivering a contemporary 21<sup>st</sup> Century curriculum. It will of course be noted that but for the intervention of the school that the listed building at the core of Queen Anne's Grammar School would have been sold for conversion for a non-educational use. It is therefore a source of pride that the school has been able to retain this listed building in the use for which it was originally designed.



*Northern part of the campus*



22. As custodians of these historically significant listed buildings, we strive to maintain them well, sensitively developing and utilising them. However, costs are high and development opportunities are limited, particularly in the constrained and congested northern part of the campus. Strategic development of other sections of the campus is therefore essential to enable growth but more importantly to secure the essential improvement of the school facilities to the required standard.

## (ii) Legacy Buildings



*Southern part of the campus, former Queen Anne's Girls' Grammar School*

23. We have inherited a significant stock of low quality, low density, post second world war buildings which are no longer fit for purpose and have in any event reached the end of their design life. The majority of these buildings are located on the south side of the campus and were built as extensions to the Queen Anne's Girls' Grammar School, and their redevelopment has been an ongoing project since they were first acquired from the City. They have now been adapted to various degrees for use as a coeducational independent preparatory school.
24. Those buildings, although well looked after, are no longer fit for purpose. They are typically poorly insulated, difficult and expensive to maintain and costly and inefficient to run. Many of them have flat roofs with inadequate drainage. Asbestos was a popular building material during this period and although much has been removed or contained, and all properly identified and under a strict management plan, the maintaining and developing of these buildings is a complex and expensive process.
25. On the northern side of the campus there are also some comparable buildings, with similar issues, constructed in the mid to late 20<sup>th</sup> century that were originally built to meet the needs of a boys boarding school. However, these buildings now serve a larger coeducational school

and often a much broader age range. For example, the Senior School Sports Hall and changing facilities was built in 1974 to serve 421 boys but is now required to serve the needs of a coeducational school Senior school of 569 and is also used by the 194 pupils at St Peter's 2-8. Its ancillary facilities are particularly sub-standard and in urgent need of replacement. Such facilities as well as being out dated no longer adequately meet the needs of the school community.

### **(iii) Large Indoor Spaces**

26. The existing large internal spaces in all three areas of the school are at capacity. The halls used for assemblies, chapels and for dining are often full on a daily basis and larger communal spaces are immediately required.
27. The chapel built in 1861 was reconfigured and had a balcony added in 1974 in order to seat 450. This now means that pupils and staff at the senior school cannot comfortably worship together. Regular communal worship is at the heart of the ethos of St Peter's School.
28. The Memorial Hall, extended in 1960 and further improved in 2012, has a capacity of 450 – 500 depending on configuration. The Hall cannot therefore comfortably seat a whole senior school gathering, and is frequently found lacking in capacity and sophistication for the huge range of internal and external events it is required to host.
29. The dining room at St Peter's has been evaluated by catering consultants who calculated that in the current space and time allocated it should cater for 450 covers. At lunchtime we currently feed up to 900 every day, which inevitably leads to long queues and significantly detracts from the dining experience.
30. It is essential that increased provision for the chapel, dining and assembly functions for the current school numbers, even without the anticipated growth. These problems have been particularly evident during the current crisis.

### **(iv) Physical Relationship and Relative Location of Buildings**

31. Due to the nature of the existing buildings on the northern campus and the evolutionary nature of the growth and development of the school, there is a clear need for the rationalisation and reorganisation of the campus to improve the efficiency of the site and its internal and external spaces. For example, some departments teach in classroom spaces distributed all around the site. This led to the proposed creation of "learning hubs" gathering departments and related subjects together. This became a key driver in the development of the recent award winning Pascal building which provides hubs for Mathematics and for Modern and Foreign Languages.
32. However, currently the sciences are spread over the campus, with Biology located at significant distance from Chemistry and Physics, and remote from other STEAM subjects such as DT, Art and Computer Science.



33. The school aims to further develop its facilities for teaching, in logical and strategic relation to each other, to foster cooperative and blended contemporary learning.

#### **(v) Duplication and Consolidation**

34. Due to the way that the school has developed, acquiring additional buildings and facilities over the years (most notably the acquisition of Queen Anne’s Grammar School in 2001), the school has now various facilities which are separated, duplicated, poorly located, and/or inadequate. Though much work to improve and rationalise the campus has been undertaken, there is still a significant need for consolidation, rationalisation and improvement of facilities. The development of new facilities for Sport, Music, Art, Drama and DT are prime examples of dated and low quality amenities which require a whole school development approach. The new master plan aims to provide more logically located, fit for purpose facilities that properly serve all sections of the school but are also designed and located to be more suitable and easily available for use by the wider community.



*Former Queen Anne’s Grammar School 1908-1910*

#### **(vi) Compact Site**

35. St Peter’s campus, compared to our many rural competitor schools, is a relatively small and compact 19 hectare site in the heart of a city. 15% of the campus is on the “wet” side of the flood defences. It is therefore essential to maximise the use of every area of the site, without compromising the open feel of the campus or reducing key outdoor green spaces and sports provision. The northern side of the campus is already well developed and further major construction is constrained by the number and density of listed buildings. The southern part of the campus, is however less densely built with greater scope to creatively develop and reconfigure the layout through the removal or refurbishment of the significant number of low quality and low density buildings and other facilities.

## D. Conclusion

36. The continuous and extensive improvement of the school site and facilities in the heart of York is essential to fulfilling the vision of the Board of Governors and ensuring the future success of St Peter's School.
37. Were the green belt boundary to be drawn as currently proposed by the City it would essentially ignore the evident and multiple needs of the school to secure the above improvements to its estate. It is highly regrettable that the City Council has not liaised properly with the School to understand its needs and sought to draw the green belt boundary accordingly. Whilst it is understood that green belt designation is not an absolute preclusion on development it nonetheless seriously undermines our ability to properly plan for known eventualities.
38. Should the green belt boundary be drawn in the most logical location – ie on the top of the newly increased in height flood defences then the school would intend to bring forward the masterplan within the next 15 years, thereby securing the future for the school as one of the City's key assets.
39. It is of paramount importance for the school to enhance and expand high quality educational facilities to ensure continued and improved educational excellence in an ever more competitive and challenging environment. The school is an evolving institution, with numerous existing constraints to developing the facilities as outlined above. The ability to redevelop and reconfigure the southern side of the campus in particular is seen as essential for the sustained success of the school without additional constraints, such as the proposed green belt boundary, which will clearly hinder unacceptably the reconfiguration and redevelopment of the whole site.



*View of the Southern campus from the north*



This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified of any discrepancy. This drawing is copyright and remains the property of McNeil Beechey O'Neill LLP.



1. First Team Cricket Field
2. 35x30 Cricket Nets / MUGA
3. First XV Rugby Pitch
4. Riverside Pitches
5. Colts Pitch
6. Wightman Pitch
7. St Peter's 8-13 Pitches
8. The Paddock
9. Tennis Court / Netball Court
10. Tennis Courts / Netball Courts
11. Tennis Courts / Netball Courts
12. Astro Turf
13. Tennis Courts / Netball Courts
14. St Peter's 8-13 Lawns
15. St Peter's Playground
16. St Peter's Play Area
17. St Peter's 8-13 Fitness Trail
18. St Peter's 8-13 Playground & Equipment
19. St Peter's 8-13 Quiet Garden
20. St Peter's 8-13 Playground Equipment
21. St Peter's Informal Spaces
22. Long Jump Pit
23. Boarding House Gardens

Client:  
**St Peter's School, York**

Project Title:  
**Master Plan**

Drawing Title:  
**Existing Location Plan with Labelled Sports Pitches**

Scale @ A1: 1:1250 Date: 18-05-21 Drawn: jch

Project Ref: SP06 Drawing No: 001 Stage: 1 Rev: b

File Ref: K:\Job\St Peters Site Survey Q3 2021





This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified of any discrepancy. This drawing is copyright and remains the property of McNeil Beechey O'Neill LLP.

### St Peter's School Listed Buildings & Clifton Conservation Area

- Grade II  
(in conservation area)
- In conservation area
- Outside conservation area
- Clifton York  
Conservation Area

1. Linton House (off campus)
2. Manor House (off campus)
3. Dronfield House (off campus)
4. Clifton & Grove Day House
5. The Lodge
6. School House (off campus)
7. Main Building St Peter's
8. Memorial Hall
9. Chapel
10. Library
11. Burton Cottage
12. Music School
13. Drama Centre and Music Annexe
14. Queens Building
15. Pavilion (P Block)
16. Science Block Old Chemistry
17. Science Block New Physics
18. St Catherine's
19. Pascal Building
21. CCF Building (St Olave's Site)
22. White House (Denison House)
23. Chilman Building
24. Estate Offices
25. Wentworth House
26. Clifton Dining Room
27. The Rise Boarding House
28. Sports Centre
30. Swimming Pool
31. Boat House
- 31a. Upper Boat House
32. STP 8-13 Main School (Formerly St Olave's)
33. St Olave's Art/Design & Tec
34. St Olave's Music Department
35. C Block (Senior Art & Biology)
36. Astro Changing Rooms
37. St Olave's Sports Hall

Rev	Date	Details	By

**mbo architects**

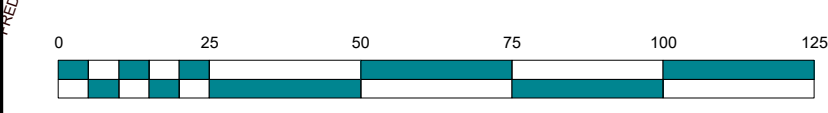
Castle Gate House,  
28 Castle Gate,  
York,  
YO1 9EP  
Tel: (01904) 495500  
Email: mbl@mboarchitects.co.uk

Client:  
**St Peter's School, York**

Project Title:  
**Master Plan**

Drawing Title:  
**Listed Buildings and  
Conservation Area**

Scale @ A1: 1:1250	Date: 18-05-21	Drawn: jch
Project Ref: <b>SP06</b>	Drawing No: <b>002</b>	Stage: Rev: <b>1 - b</b>





This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified of any discrepancy. This drawing is copyright and remains the property of McNeil Beechey O'Neill LLP.

### St Peter's School Building EPC Ratings

- A** 0-25
- B** 26-50
- C** 51-75
- D** 76-100
- E** 101-125
- F** 126-150
- G** Over 150

100 would be typical



<b>Client:</b> St Peter's School, York			
<b>Project Title:</b> Master Plan			
<b>Drawing Title:</b> Energy Efficiency Estate Plan			
<b>Scale @ A1:</b> 1:1250	<b>Date:</b> 18-05-21	<b>Drawn:</b> jch	
<b>Project Ref:</b> SP06	<b>Drawing No:</b> 003	<b>Stage:</b> 1	<b>Rev:</b> b

File Ref: K:\Job\St Peters Site Survey Q3 2021



This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified of any discrepancy. This drawing is copyright and remains the property of McNeil Beechey O'Neill LLP.



### St Peter's School Building Quality Index

- CAT A**  
Adequate
- CAT B**  
Inadequate
- CAT C**  
Residential

1. Linton House (off campus)
2. Manor House (off campus)
3. Dronfield House (off campus)
4. Clifton & Grove Day House
5. The Lodge
6. School House (off campus)
7. Main Building St Peter's
8. Memorial Hall
9. Chapel
10. Library
11. Burton Cottage
12. Music School
13. Drama Centre and Music Annexe
14. Queens Building
15. Pavilion (P Block)
16. Science Block Old Chemistry
17. Science Block New Physics
18. St Catherine's
19. Pascal Building
21. CCF Building (St Olave's Site)
22. White House (Denison House)
23. Chilman Building
24. Estate Offices
25. Wentworth House
26. Clifton Dining Room
27. The Rise Boarding House
28. Sports Centre
30. Swimming Pool
31. Boat House
- 31a. Upper Boat House
32. STP 8-13 Main School (Formerly St Olave's)
33. St Olave's Art/Design & Tec
34. St Olave's Music Department
35. C Block (Senior Art & Biology)
36. Astro Changing Rooms
37. St Olave's Sports Hall

Rev	Date	Details	By

**mbo architects**

Castle Gate House,  
28 Castle Gate,  
York,  
YO1 9EP  
Tel: (01904) 495500  
Email: mbl@mboarchitects.co.uk

Client:  
**St Peter's School, York**

Project Title:  
**Master Plan**

Drawing Title:  
**Building Quality Index**

Scale @ A1: 1:1250	Date: 18-05-21	Drawn: jch
Project Ref: <b>SP06</b>	Drawing No: <b>004</b>	Stage: Rev: <b>1 - b</b>





This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified of any discrepancy. This drawing is copyright and remains the property of McNeil Beechey O'Neil LLP.

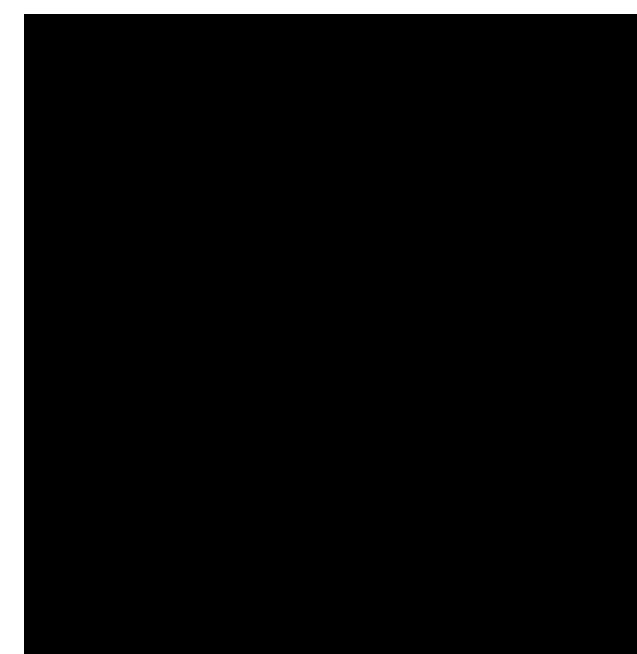


### St Peter's School Departments and Uses

- Accomodation
- Estates
- Mixed Academic
- Performance Hub
- STEAM Hub
- Dining Hub
- Sports Hub
- Medical Centre
- Library

- Points of Entry
- Impact of proposed CYC Green Belt Boundary
- Site Boundary

- A** Performance Space
- B** Music
- C** Sports Music & Exams & Performance
- D** Art & Technology
- E** Parking
- F** Medical Centre
- G** Dining Hub

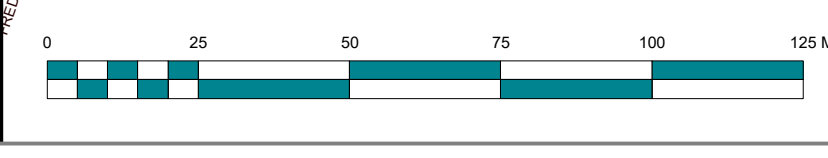


Client:  
**St Peter's School, York**

Project Title:  
**Master Plan**

Drawing Title:  
**Proposed Master Plan**

Scale @ A1: 1:1250	Date: 18-05-21	Drawn: jch
Project Ref: <b>SP06</b>	Drawing No: <b>005</b>	Stage: Rev: <b>1 - c</b>

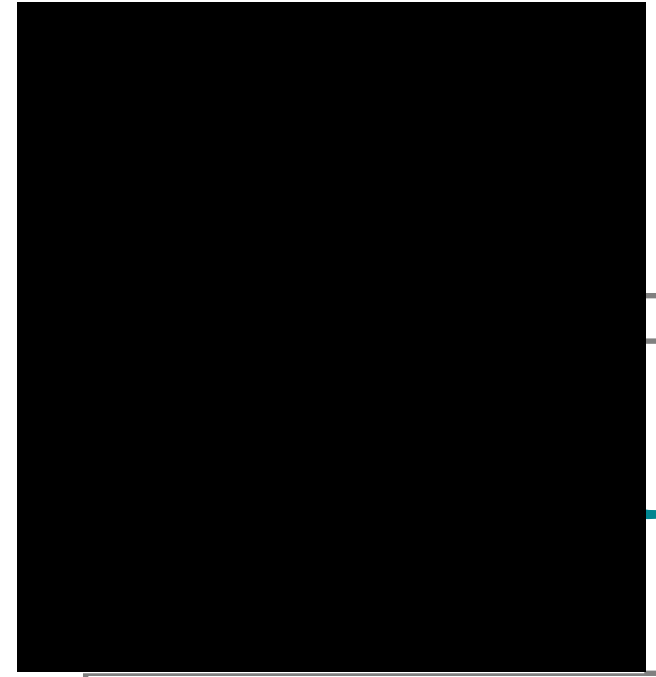




This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified of any discrepancy. This drawing is copyright and remains the property of McNeil Beechey O'Neill LLP.



— — — — — Proposed Boundary of Green Belt



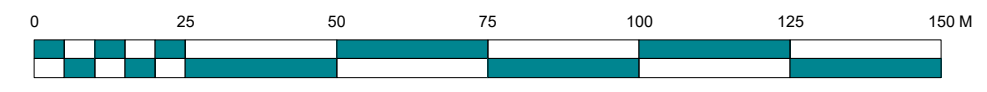
Client:  
**St Peter's School, York**

Project Title:  
**Master Plan**

Drawing Title:  
**Proposed Greenbelt Boundary**

Scale @ A1: 1:1250 Date: 18-05-21 Drawn: jch

Project Ref: SP06 Drawing No: 006 Stage: 1 Rev: a



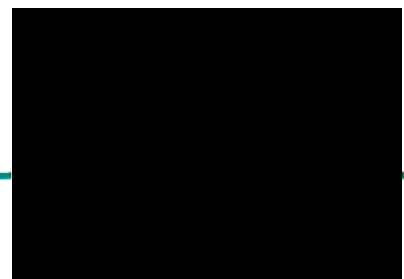
File Ref: K:\Job\St Peters Site Survey Q3 2021



# St Peter's School, York



## 15 YEAR DRAFT DEVELOPMENT MASTER PLAN



# CONTENTS

<b>1</b>	<b>Introduction</b>	<b>4</b>
1.1	The Proposal	4
1.2	Site Location	4
1.3	The Campus	4
1.4	Master Planning Principles	5
1.5	Master Plan Document	5
<b>2</b>	<b>Site analysis</b>	<b>6</b>
2.1	Built Landscape and Physical Setting	6
2.2	Urban Context	8
2.3	School Facilities on Campus	10
		10
2.4	Facilities Off Campus	10
<b>3</b>	<b>Constraints &amp; Opportunities</b>	<b>11</b>
3.1	Identified Constraints	11
3.2	Identified Opportunities	11
3.3	Future Capacity for Growth	15
3.4	Traffic	15
3.5	Energy Efficiency	16
<b>4</b>	<b>Vision &amp; aims</b>	<b>17</b>
4.1	Distinctive	17
4.2	Permeable and Connected	19
4.3	Attractive	20
4.4	Sustainable Development	20
4.5	Safe	20
<b>5</b>	<b>Master Plan Guiding Principles</b>	<b>22</b>
5.1	Master Plan Concept	22
5.2	Key Features	22
5.3	Design Principles	22
5.4	Proposed Master plan	23
5.5	Building Typology	25
5.6	Landscape & Greenspaces	25



5.7	Biodiverse - Sustainable Development	26
<b>6</b>	<b>Summary</b>	<b>27</b>
<b>7</b>	<b>APPENDICES</b>	<b>28</b>
7.1	SP06-001 Existing Sports Facilities Plan	28
7.2	SP06-002 Listed Buildings & Conservation Area Plan	28
7.3	SP06-003 Energy Efficiency (EPC's) Estate Plan	28
7.4	SP06-004 Building Quality Index	28
7.5	SP06-005 Proposed Draft Master Plan	28
7.6	SP06-006 Proposed Greenbelt Boundary	28

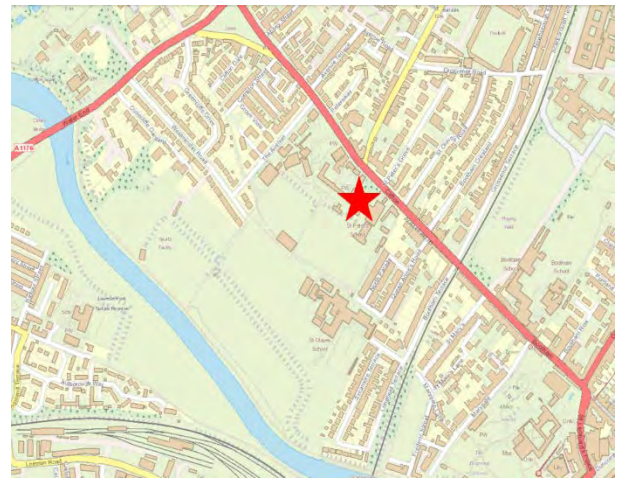
# 1 INTRODUCTION

## 1.1 The Proposal

The proposed master plan seeks to establish the development framework for the school over a 15-year period, 2021-2036. Considering the school's vision and aims to provide the best possible learning environment for its students. Including modern academic, sports, performance facilities, environment, energy efficiency, and considering transport provision to support the school's onward growth.

## 1.2 Site Location

St. Peter's School site is located off the A19 (Clifton) to the west of York City centre. Within the A1237 Ring Road in the west and North of the River Ouse.



## 1.3 The Campus

The whole school estate extends to approx. 19ha. However, the main school campus is 17.6ha being located to the West of York City centre and to the South of the A19. To the North the campus is served and bounded by the A19 a main arterial route into city via Clifton and Bootham, to the West and East boundaries the site is enclosed by development which is predominantly residential in nature. The Southern aspect of the site is open, being bounded by a newly improved widened and heightened clay flood barrier, flood walls and an area of wash land to the River Ouse. Part of the lower site is also subject to flooding as it forms a wash land area. Currently the wash land at the southernmost boundary and East and West of the new boat house is occupied by sacrificial practice sports pitches. Currently designated as educational use there will be no requirement to change this.



The current campus is physically separated into a North and South Campus by an existing PROW, running East-West between Queen Anne's Road to the east and the Avenue and Westminster Road to the West. The two respective parts of the Campus are connected across the PROW via a footbridge at the Queen Annes Road end of the PROW.

It should be noted therefore that the terms North and South Campus' referred to elsewhere in this document, refer to those parts of the campus which lay either South or North of the PROW.



Image showing existing Public Right of Way No.55/139/10

## 1.4 Master Planning Principles

We could say that the master planning process started back in 1844, and over the next 100 years or so, it evolved and as with all master plans it was replanned and re-evaluated.

The guiding principles for the current master planning process are a combination of the following:

- The school's strategic vision and aims.
- The establishment of hubs (Grouped facilities rather than standalone departments).
- Improved traffic management.
- Provision for enhanced Music, performing arts, sport, expansion of the STEM hub to form an inclusive STEAM hub and dining facilities.
- Improved connections within the site.
- Responding to the schools ongoing development needs and improved facilities master plan for a minimum 15-year period.

## 1.5 Master Plan Document

This document has been developed to provide the following:

- Site analysis, constraints, and opportunities.
- Basic landscape and physical appraisal.
- Proposed draft master plan.
- Brief indication of the design principles to be developed.

## 2 SITE ANALYSIS

### 2.1 Built Landscape and Physical Setting

By virtue of its inherent history St. Peters School provides education through a varied building medium. Consisting of some fine period listed buildings, through to newly built high-quality blocks such as the Pascal building completed in 2018 and the slightly later boat house.

#### North Campus

All buildings set within the north campus are coherent with one another and tell a visual story of development and growth.



St Peters School North Campus looking South.

#### South Campus



South campus formerly known as St. Olaves, with the Grade II listed former Queen Annes School to the left.



Within the south campus the grade II listed building Queen Anne's Girls Grammar School, dated 1908 (latterly known as St. Olave's), extended post war era with steel/concrete frame and prefabricated panels. Acquired by St. Peter's as a valuable asset to the estate and onward development of the school.

The site generally falls from North to South in a series of plateaus created through the onward development and cut and fill, to achieve satisfactory level drained sports pitches above the wash land area at the lower end of the site adjacent the River Ouse.



Campus view from the southwest along the River Ouse

It is clear the original school building along Clifton has stood isolated and in splendour, for many years. A position and context enjoyed to this day when approaching the school from either Clifton Green or Bootham. Helped by the abundance of mature trees, being set back from the road and resplendent sympathetic additions of the Chapel and current library. As the area around the site became subject to more suburban development, the school has retained its setting along Clifton. Through the acquisition of several land parcels and buildings, allowing the school to grow and has formed the context we see today.

The school's expansion had been sufficient in the past. As we see today the North and South parts of the campus are now at capacity in terms of land use. A more pressing issue and one that has been a significant factor in master planning for the future is the condition of some building stock which is now at end of useful life in quality and useability. Further land is not available to the school and replacement would be the most economical option to reach the schools aims and policies, in the future. However, this in turn requires we consider the decant spaces,



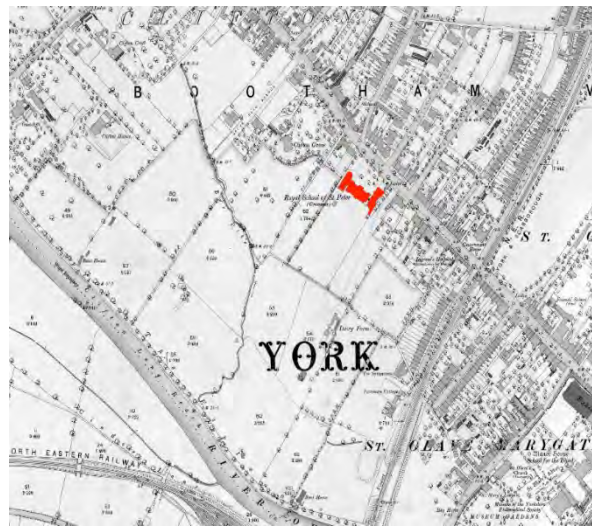
construction compounds and access. To ensure the school can continue to function with minimal disruption a point of paramount importance and non-negotiable for the school.

## 2.2 Urban Context

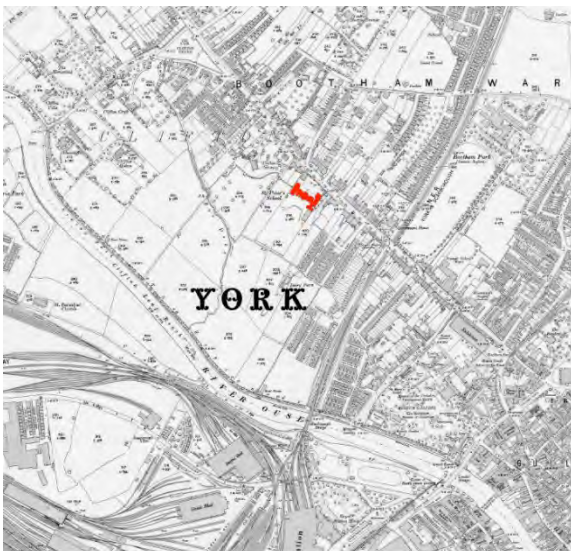
The present site has been occupied by St. Peter's School since 1844, although the site has been occupied in one form or another since the Roman period. Most of the surrounding urban area, that is to say the buildings outside the bar walls have developed since the 1850's. The original school building occupies the high ground above the earlier flood levels of the River Ouse to the South.



1852



1892



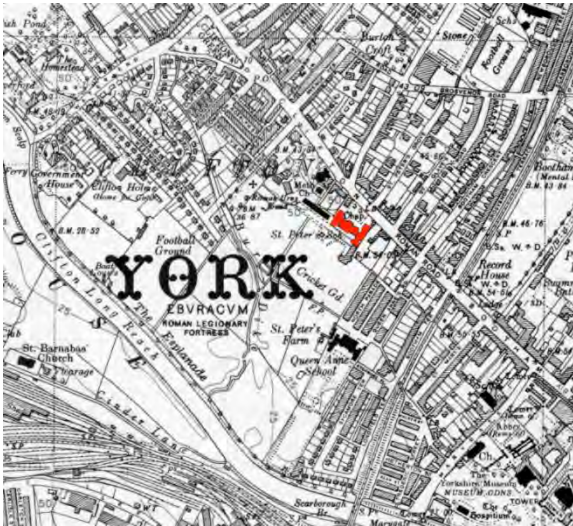
1909



1931

Victorian Development of the area around the campus started along Clifton and Bootham, by the turn of the 20<sup>th</sup> century development progresses to occupy the land to the West and East of the current Campus demise.





1952



2017

There is a good mix of property types from Victorian Villas and town houses to Edwardian Terraces, inter and post war suburban semis. The school itself had also developed during this period adding additional buildings and facilities, through disposals and acquisition the school's estate increased during the 20<sup>th</sup> and 21<sup>st</sup> centuries, to form the campus we see today.

Much of the school's massing is set to the North of the site with a smaller concentrated element to the Southeast, being the former Queen Anne's Girls Grammar School, acquired in 2001. Circulation, parking, service areas and playing fields occupy the remainder of the site, save the isolated swimming pool and more recent boathouse.



Current view of the school from the river, shows the improved flood defence work at the centre axis of the image. Former St. Olave's School just to the right of centre.

## 2.3 School Facilities on Campus

Existing facilities within the school campus encompass every type one would expect for a school of this size and type to function. As a boarding school there are additional facilities such as boarding houses, and pastoral facilities. However, currently some stock is now in need of upgrade or replacement. Changes in the curriculum and increase in pupil numbers will require some academic facilities to upgrade, increase in any case, with the gradual rise in pupil numbers. While other areas will require replacement refurbishment as part of an ongoing program of improvement to form facilities of an acceptable standard. Modern curriculum requirements also place an onus to plan ahead, improve and provide. More details can be found in the appendices.



Cricket square, north campus



First XV Rugby, north campus



Chilman Building, north campus



Pascal Building, north campus



Swimming Pool, north campus

## 2.4 Facilities Off Campus

The school currently finds that it needs to use offsite third-party facilities on a regular basis, which adds to its carbon footprint. Those offsite facilities generally being sport all weather pitches, squash courts, gyms for cardio and physio due to the somewhat stretched and undersized facilities on the school campus.



## 3 CONSTRAINTS & OPPORTUNITIES

An initial examination of the site sought to identify the constraints and opportunities which would govern the future development plan of the site in terms of its estate and meeting the future academic, sports, music, and pastoral needs of the school.

### 3.1 Identified Constraints

- 15% of the site is affected periodically by flooding of the EA designated washland.
- Site is divided by an existing public right of way (PROW 55/139/10).
- Listed Buildings and an area of the site within the conservation area.
- Impact on neighbouring residential properties.
- Poor vehicular access to southern campus.
- Relatively poor condition, outdated facility provision of some building stock.
- Implementing a plan of renewal will require repositioning some facilities, including a new sports hub. Retention of available land to decant parts of the school to temporary accommodation on campus and serve as construction compounds and haul roads. This will be better served to the South of the PROW, retaining the existing historic sports pitches to the north of the public right of way.
- York City Council revised Green Belt Boundary if adopted will adversely affect the school's ability to develop in the future.

### 3.2 Identified Opportunities

- Opportunity to provide better access to the south campus.
- Improvement of the existing sports facilities in terms of building stock and installation of all-weather pitches.
- Improvement of academic facilities, without detracting from the historic nature of the site.
- Enhance biodiversity of the open space boundaries.
- Reduction of the carbon footprint through reduced travel and BREEAM very good to excellent energy efficient building design and construction.
- Landscape opportunities.
- Much of the proposed new build will be a replacement of existing end of life building stock.
- Move the proposed green belt boundary in line with the current clearly defined physical edge of the flood defences. Confirmation of the green belt boundary along the flood defences will allow the school to develop north of the flood bank and provide a sustained program of evolution for the school campus over the next fifteen to twenty years.

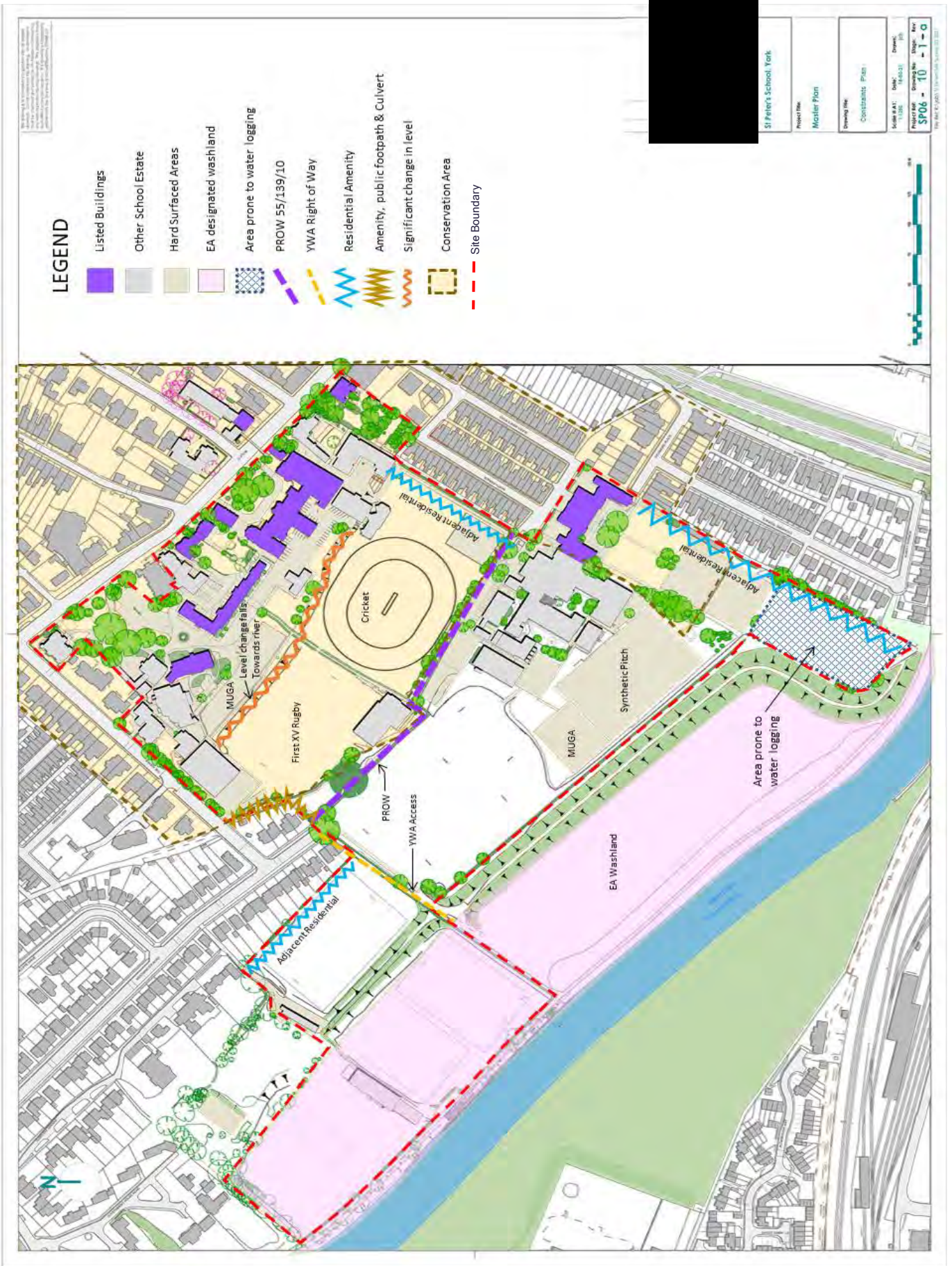


South Campus buildings - image shows that upgrade will be cost prohibitive.



South Campus in the foreground, image taken before completion of enhanced flood defence works.





Constraints Plan - not to scale





Opportunities Plan - not to scale

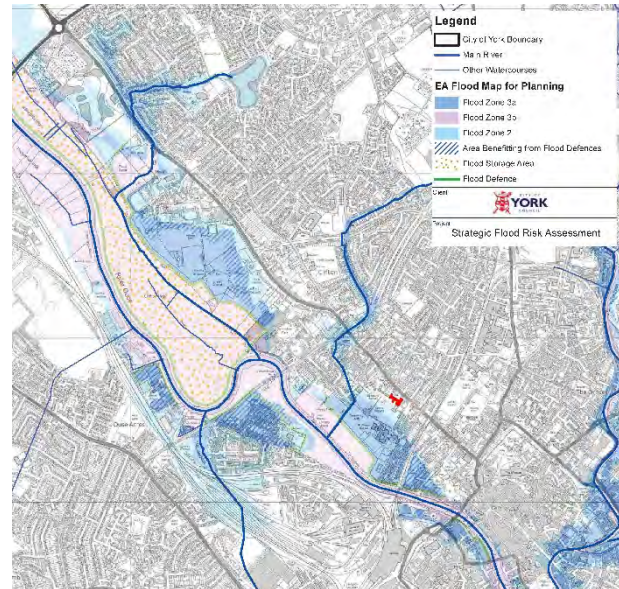


### 3.3 Future Capacity for Growth

Despite the historical and urban constraints, the campus still offers good capacity for growth through redevelopment and improvements brought about by a cohesive master plan to be implemented over a 15 to 20-year period.

#### Flood Risk

Recently enhanced flood defence work (due to complete 2021) has reduced the risk of serious flooding to most of the site except the two areas either side of the boathouse, designed to act as washlands for temporary flood storage. Currently those playing fields to the extreme south of the school's boundary. Despite the completion of the much-improved flood defences, the EA flood mapping still shows a large proportion of the school playing fields in the wash land area. This currently affects two sacrificial pitches to the West and East of the boat house. Prompting the school to make better use of the land immediately north of the flood defences for synthetic pitches.



EA Strategic Flood Risk Assessment.

### 3.4 Traffic

Traffic on site and in the surrounding streets is a significant concern to the school. Drop off and pick up times can result in increased congestion in the surrounding streets. Although peak traffic generally last around 30minutes twice a day. Having large numbers of cars passing through the site with the current road layout raises safety concerns.

Various initiatives to reduce the traffic have been implemented by the school, such as park and stride, cycle shelters and cycle training, car sharing initiatives and a park and ride initiative with Bootham School which was about to start pre- Covid. There would be no reason why such initiatives would not continue to be implemented into the school's future travel plan.

The school like many others has had to adapt to providing drop off zones and increased visitor parking. However, a further issue is the day to day servicing the site, by deliveries and coaches ferrying students to offsite facilities and activities, which impacts on the local community.

How people travel to and through the site is also key factor in the development plan. Improving traffic flow on site through careful design will in turn improve traffic congestion off

site. Development of facilities to enable better and safer use of more sustainable travel options for pupils and staff. For example, bus access, cycle ways and storage, as well as developing facilities to exploit park and stride and park and ride solutions will be part of the detailed strategy.



Looking North up Queen Annes Road with its restricted access, due to resident parking



Clifton (A19) looking East, can be congested in peak hour traffic. School on Right

### 3.5 Energy Efficiency

Current energy efficiency is well below par for several existing buildings. St Peter's School as custodians of a diverse estate for the current and future generations recognises the importance of considering the long-term impact of their decisions made today, particularly in relation to the future development of the site. It is the aim of St Peter's School to be good stewards of resources, to be more efficient with the resources required to run and develop the school, and to reduce the impact this will have on the planet.

It is therefore a key driver for the development of the campus to continue to improve energy efficiency and to move toward more sustainable energy sources. The lifetime environmental impact and costs of new buildings and the replacement or redevelopment of old building stock are part of the design and development strategy. Current energy efficiency levels are detailed in Appendix 7.1 showing current EPC's.



Poor quality CLASP procured previous LA stock in need of replacement has minimal architectural value in terms of fenestration and quality of build.



## 4 VISION & AIMS

St Peter's School vision is to be able to carry on doing what they do with great success, delivering outstanding academic excellence with an extensive and diverse range of well-resourced co-curricular activities. To have the flexibility on site for continued development of the school as a creative, sustainable campus. The following aims are based upon a need and expectation to deliver its vision.

### 4.1 Distinctive

The plan aims to create a distinctive development, one which continues the sense of place that has become synonymous with the history and setting of the school. The master plan reflects a continued evolution of the school campus to provide quality facilities, an intrinsic element for the delivery of a first-class education. As such the facilities that currently require significant enhancement are as follows:

#### **Music:**

St Peter's has a nationally recognised music department which produces outstanding music and musicians from limited facilities the heart of which is a converted town house. Practice and teaching rooms are few and instrumental lessons and practice can be heard taking place all over the school in various rooms and spaces which were not designed for this purpose. More recently, to accommodate the additional 80 individual music lessons a week required for the choristers who joined the school in 2020, temporary converted glamping pods were hurriedly installed as music teaching and practice rooms. The school requires dedicated purpose-built music teaching, practice, and ensemble rooms, as well as improved appropriately designed performance spaces more suitable for hosting music events.

#### **Performing Arts:**

School productions are of an extremely high standard and have a very dedicated team who work hard to achieve amazing results transforming the halls into spectacular theatre venues. However, these spaces are outdated and have limited capacity. A purpose-built performance space with a greater audience capacity, which could also overcome some of the other constraints mentioned above is required, plus additional rehearsal and studio space to meet the needs of the drama curriculum more adequately.

### Sport:

St Peter's Sport achieves national success at all levels and in a broad range of girls and boys sport at all age levels. Some facilities are however outdated with limited capacity. Due to the city centre nature of the site, the school has fewer sports pitches than most of its competitor schools. This is further limited due to two areas of sports pitches being located on the river side of the flood defences. The amount of time these are unavailable due to the EA mitigated designed flood wash being implemented, appears to be increasing putting further pressure on the remaining grass pitches.

The construction of a synthetic pitch in 2008 suitable for hockey and tennis brought significant improvement to the school's sport facilities. However, with the rapid increase in popularity and success in hockey the school is now transporting students to other synthetic pitches all-round the city for practice and for matches which is highly undesirable, a waste of time for staff and pupils in an already busy day and puts additional coaches on the road network of York. In winter, the lack of floodlights on the existing pitch means that they are not able to fully utilise the pitch and must travel to floodlit facilities instead. The installation of another synthetic pitch for Hockey, and installation of flood lights for both is essential.



Recently completed boat house

To have at least one of these as a covered surface by installing an "air dome" or other appropriately designed cover to enable play in all weathers would be ideal. To reduce pressure on the grass surfaces further the installation of more synthetic pitches for football and rugby are also required. Thus, increasing the number of plays per week, and during times of inclement weather offering an on-site alternative to the sacrificial practice pitches in the washland area of the campus.

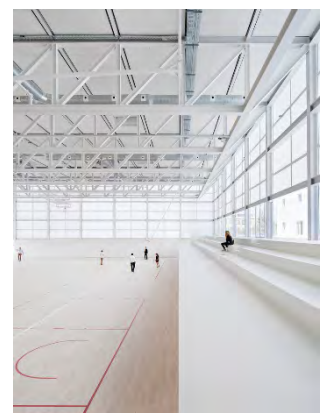
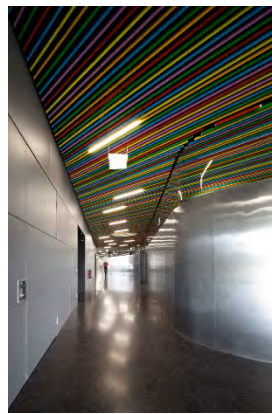
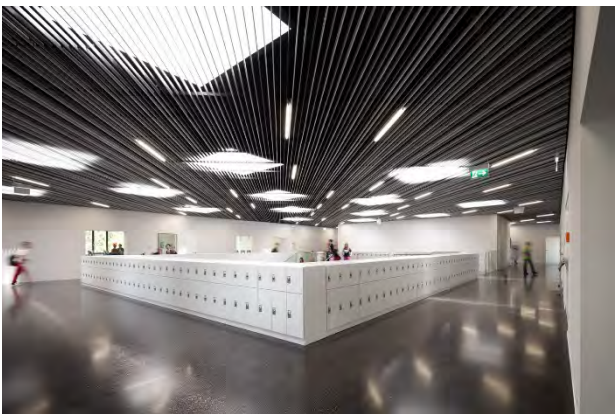


Existing sports hall

The current sports halls now reflect out of date standards and do not comply with the latest Sport England design specifications. Other facilities, such as the strength and conditioning suite and weights room although having the latest equipment are too small to cater for the upward demand. Additional space for fitness equipment, including specialist equipment for sports such as rowing are much needed additions to the sports facilities.



Further facilities would include studio space for exercise and dance classes. Multiple changing and showering facilities. Introduction of onsite squash courts, medical and physio rooms. Dedicated sports classrooms and offices should all form part of a central sports hub.



Aspirations to create a multifunctional sports hub, embracing updated facilities and flexibility for future use.

The improvement of sports facilities and the development of a “sports hub” designed to provide much needed improved facilities for the school as well as more accessible and a wider range of facilities for the community is one of the central aims of the site development plan.

## 4.2 Permeable and Connected

The masterplan is developed around an existing hierarchy and series of open spaces linked by existing pedestrian footpaths, cycle ways and vehicular routes within the safe guarded areas of the campus. In terms of external connections, the plan relies upon the existing vehicle and pedestrian accesses including the continued provision of the PROW detailed elsewhere.



Looking west on the existing PROW



Existing PROW looking west showing school pedestrian bridge crossing



Gated path adjoining PROW to the east



Footpath linking Queens Building with swimming pool



Gated access to south campus from PROW

Reviewing emergency access to the south and north campus areas, and also reviewing additional student connections between the north and south campuses.

### 4.3 Attractive

Attractive buildings and landscape that will enhance the site. Taking account of external views into the site and exploiting the open spaces defining and creating biodiversity opportunities.

### 4.4 Sustainable Development

To improve energy efficiency, through the provision of best practice design to achieve sustainable material usage, high levels of insulation, power generation, to achieve BREEAM 'excellent' or as a minimum 'very good'.

### 4.5 Safe

Student and staff safety will remain an important part of the master plan design, taking every opportunity to improve safeguarding policy by designing out possible issues at the outset.



The covid pandemic, has required some creative thinking in order to implement measures to safeguard all, during the unprecedented times. Moving forward there is no reason why the future planning for the school would not take such measures into account. Ensuring that should there be a recurrence or similar situation the school and campus will be prepared to meet any new restrictions. We already know that an important element in the suppression of cross contamination comes from being able to provide adequate social distancing. This in turn puts pressure upon the educational environment, which requires flexibility in the use of space both internally and externally and as such, the school aims to be fully prepared through the provision of the development master plan.



# 5 MASTER PLAN GUIDING PRINCIPLES

## 5.1 Master Plan Concept

The master plan aims to provide a considered overall plan for the site, developing a concept layout developed in conjunction with existing facilities and building stock of St Peter's School. The intention is to provide key design principles and the basic conceptual layout upon which detailed planning applications can be based.

The overarching concept is for the development of a phased hub style development within a connected hierarchy of links associated with the existing open sports space, retained academic buildings. A core element is the provision of a workable methodology to carry out the master plan proposals in a way that will not interrupt the smooth day to day running of the school.

The relationship of the school campus to the A19 to the North, will remain essentially the same. Long term improvements to free-flowing vehicular movements will come from improved traffic management and education on sustainable transport options for staff and pupils.

## 5.2 Key Features

During the master plan process several alternative layouts have been considered. However, the key site features remain constant and provide the basis for any design these are:

1. Existing accesses to the site.
2. Investigating improved access to the site.
3. Protected trees.
4. Plateaued site topography.
5. Existing development to the North, East and West of the site.
6. River Ouse, Wash Lands and Flood Barrier to the South.
7. Eight Grade II Listed Buildings and the defined Conservation Area.
8. The existing Public Right of Way through the site.
9. Retained right of way to existing pumping station.
10. Area for temporary decant and contractor compound/access being on the land immediately west of south campus and north of the flood barrier. As used recently by the environment agency.

## 5.3 Design Principles

The design principles have been established using the existing landscape and sports field capacity, existing development, and site topography. The master plan seeks to mitigate the anticipated minimal impact of the proposed redevelopment on the site, its landscape and



openness to the South while at the same time creating high quality academic facilities with excellent amenity.

The design principles therefore include the following:

- Development of a range of high-quality campus buildings, including music and performing arts hub, sports hub, enhanced STEAM hub, replacement academic buildings.
- Creation of new all-weather synthetic pitches and improvement of existing sports pitches and landscape buffers.
- Provision of improved ancillary facilities integral to the school including improved dining and medical facilities.
- Review access to the south campus below the PROW, including provision of much needed clear emergency access.
- Development of a landscape and all year-round sports pitch strategy creating a suitable sports hub, while maintaining the current open aspect enjoyed from the south bank of the River Ouse.
- Review pedestrian permeability between North and south Campus' currently served by a single footbridge over the PROW.
- Working with the local community to provide beneficial shared facilities.
- Creation of a safe environment ensuring that open space and footpath links within campus are overlooked and better connected.
- Address concerns brought about by the covid pandemic, that will ensure compliance with measures and provide a safe environment for all in the future.

## 5.4 Proposed Master plan

1. The proposed master plan provides three distinct development blocks referred to as hubs within the existing campus boundary. Which will require a phased development approach over a 15-20 year period, incorporating a system of decant, demolition and replacement. Particularly to the southeast cluster and the northwest corner of the north campus.
2. Retaining green corridors as arterial pedestrian links within the campus, connecting the 3 clusters of development. With a dedicated link connecting the north and south campuses to supplement the existing bridge link.
3. The current master plan is essentially a redevelopment of 2 identified key areas and an extension to an existing group of buildings, to form a new STEAM hub. The proposal has been informed by the existing constraints of the site and the low quality of some of the existing facilities making them ripe for redevelopment and expansion.
4. As the school will continue to operate throughout development elements, space is allocated for decant of departments to temporary facilities, contractors' compound, haul roads etc. This will require the use of the site immediately north of the flood barrier.

5. The topography and makeup of the site has largely dictated the location of the blocks, however in the case of the proposed new dining facility this is proposed to utilise a part of the site which will in effect be replaced by a better facility within the south campus sports hub. It will also facilitate easier access for deliveries and complement the existing smaller Clifton Dining facility to create a 'Dining & Hospitality Hub'. This new facility overcomes a current issue over capacity for the existing dining facility to the east of the north campus. Freeing up an area of the existing central core to be redeveloped into academic use.
6. The new dining hub will form a useful, functional multipurpose space for performances, exams, provision of refreshments during first XV rugby, cricket complementing the much-needed larger dining facility.



Aspirational images for a new dining hub

7. Consolidating existing STEM facilities located in and around the 2018 Pascal building, with a new purpose-built arts and technology department. With its modern take on a north light roof for clean light in the studios. Its multiple pitched roofs also reflect adjacent residential massing to the east boundary. Predominantly single storey the varied roof line will break up the massing and create visual interest rather than obtrusive impact of the surroundings.



Aspiration images for new art and technology extension as part of a 'STEAM' Hub Consolidation

8. Music, Performing Arts and Sports hubs will share the southern campus and involve the redevelopment of the Former Queen Anne's Grammar School cluster, except that part



which is listed. The synthetic sport pitches will remain and improve as part of the proposed sports hub. Together the proposed elements form a major undertaking for the site, which will require decants, temporary accommodation and a sizeable contractor's compound. All of which will need to be accommodated within the south campus and in particular the areas shown as '7' on the on the existing sports facilities plan in the appendices.



Proposed purpose built performing arts and music hub aspirations.

## 5.5 Building Typology

The school has a good track record in providing new building stock which addresses the earlier fenestrations in a modern vernacular way. It is envisaged that the proposed campus buildings will carry on this tradition. Employing new technologies to reflect the forward-thinking school ethos. Creating landmark opportunities within the school site that enhance the long-distance views and enjoyment of passers-by as well as the students and staff who will undoubtedly utilise them to their fullest. As recently demonstrated by the 2018 completion of the Pascal Building. There is a new visual language shared between the 3 school entrances, swimming pool and pascal building, which the new proposals will continue to draw upon.



## 5.6 Landscape & Greenspaces

The increased height of the flood defences now create a defined physical and visual buffer between the school and riverside, where it had previously been more open below the south cluster of buildings. The area of the school shown as 4,5 & 6 on drawing SP06-001 remain divided by the heightened flood barrier. In terms of views from the riverside, this area is well landscaped with trees and hedges atop an incline from riverside path to sports playing fields. It is important to note therefore that the school is far less prominent today than it would have been in the past.

Master plan proposals further add to the landscape buffer with additional structure planting, making best use of the land immediately north of the flood barrier, providing modern sports facilities and improved sports pitches. While the area in the southwest of the campus will remain as sports practice pitches, with those either side of the boathouse being sacrificial at times when that area is utilised as washland.

As part of the improved facilities the school intends to install new synthetic pitches and improve the existing hockey pitch with an all-weather construction. The new structure planting and juxta position of new sports hub buildings will reduce any impact on neighbouring residential properties that the synthetic pitches may bring through regular use.

## **5.7 Biodiverse - Sustainable Development**

The hub type development has been designed with sustainable features at the core of the design. The site itself is accessible by modes of transport other than the car with good public transport links and cycle and core paths routes. In addition, the proposed scheme will include enhanced opportunities for biodiversity within its landscape fabric. Further, each element of the newly developed campus will employ sustainable methods of construction and materials.

There are opportunities to reinforce the boundaries with structure planting, which in turn will provide biodiverse habitats and structure to the site external boundaries and internal divisional boundaries too.



## 6 SUMMARY

The school functions efficiently despite its various constraints. There is, however, a pressing need to address current building inadequacies, space constraints and access over the coming years. To this end a high-level 15-year master plan has been devised.

Development potential for the existing campus is limited by size of the site. Therefore, master planning is always going to be subject to array of existing constraints. For the master plan to proceed within a legitimate plan period, and within a safe development area, it is essential that no further constraints are placed upon the site. City of York Council proposals to amend the green belt boundary will have a significant stifling effect on the school's future and its ability to contribute not only to education but also its contribution to the local economy.

The master plan deals with the historic elements, flood risk and connections within the campus. With good planning and 'room to move', these constraints can be overcome if the school is not further constrained in its approach to improve and redevelop existing facilities and estate.

The conclusion is clear, the ability to make use of the entire site north of the flood barrier is paramount to the future development of the hubs, by allowing decant space, and expansion of the sports, music, performing arts facilities along with new improved all weather pitches.

## **7 APPENDICES**

**7.1 SP06-001 Existing Sports Facilities Plan**

**7.2 SP06-002 Listed Buildings & Conservation Area Plan**

**7.3 SP06-003 Energy Efficiency (EPC's) Estate Plan**

**7.4 SP06-004 Building Quality Index**

**7.5 SP06-005 Proposed Draft Master Plan**

**7.6 SP06-006 Proposed Greenbelt Boundary**



**From:** [REDACTED]  
**Sent:** 06 July 2021 12:02  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 205591  
**Attachments:** St\_Peters\_School\_York\_Local\_Plan\_Reps\_COMPOSITE\_SUBMISSION.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications (EX/CYC/59h)

## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** No, I do not consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:**

**Please justify why you do not consider the document to be legally compliant:** We make no representations on this aspect

---

## Your comments: Duty to cooperate

**Do you consider the document to comply with the Duty to Cooperate?:** No, I do not consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:**

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:** We make no representations on this aspect

---

## Your comments: Whether the document is 'sound'

**Do you consider the document to be 'sound'?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Land south of the southern School buildings is unjustifiably proposed to be within green belt despite it serving no green belt purpose:-

- The land is not countryside. It is part of a busy and evolving campus of a large, successful school where buildings and sports facilities need to meet changing demands such as increased School role numbers, energy conservation standards and artificial sports pitches provision
- Green belt designation to check unrestricted sprawl is not relevant to this circumstance. The School's development is confined within its boundaries. The major flood bank to the south undoubtedly performs this function in this locality.
- Development on the School campus would not affect the setting and special character of the city. The river corridor to the south performs this function, particularly giving views towards the Minster. School development would be within its site confines and be of height and massing appropriate to its location. Draft policy ED6 and text supports school provision and expansion. NPPF para 85 requires Councils to cater for meeting identified requirements for sustainable development when defining boundaries to the green belt. There is no Council evidence base for the School's requirements so that the proposed green belt boundary is contrary to para 85. Our submission provides this evidence. The relevant section of the green belt boundary proposed is Section 3 lengths 8 to 13

---

## Your comments: Necessary changes



**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** The green belt boundary should be set along the northern edge of the flood bank to the south of the School's southern buildings and between the sports pitches on the western edge. See plan E attached to the planning statement

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** This issue is of major importance to the future of a high standard and successful school which needs to be able to utilise its campus for educational purposes, as schools in the main urban area are able to do

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

St\_Peters\_School\_York\_Local\_Plan\_Reps\_COMPOSITE\_SUBMISSION.pdf

---

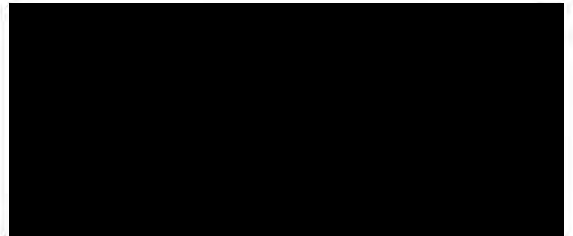
CITY OF YORK COUNCIL

EMERGING LOCAL PLAN  
REGULATION 19 CONSULTATION

LOCAL PLAN MODIFICATIONS AND EVIDENCE  
BASE CONSULTATION

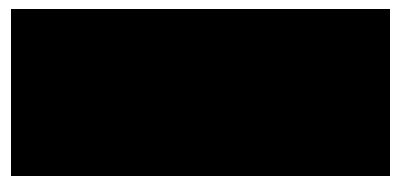
JULY 2021

Representations on behalf of  
St Peter's School, Clifton,  
York YO30 6AB





CITY OF YORK COUNCIL  
EMERGING LOCAL PLAN REGULATION 19 PUBLIC CONSULTATION  
LOCAL PLAN MODIFICATIONS AND EVIDENCE BASE JULY 2021  
REPRESENTATIONS ON BEHALF OF ST PETER'S SCHOOL YORK YO30 6AB



## EXECUTIVE SUMMARY

The Basis of The Representations: Soundness and Legal Compliance


## CONTENTS

1. Introduction
2. The nature of educational campuses
3. St Peter's School
4. Planning policy context
5. Modifications proposed to Green Belt boundaries in emerging local plan
6. Detail of Council's Green Belt boundary proposals for St Peter's School
7. Proposed amendments to inner boundary Section 3 Boundaries 8 to 13
8. Conclusion

### Attachments:

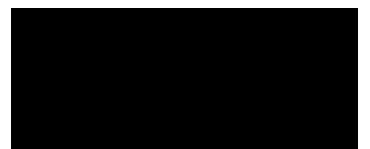
- A Modifications to Green Belt Boundary south of the School proposed June 2019 PM30
- B Modifications to Green Belt Boundary south of the School proposed April 2021 PM 75
- C Inner Boundary Section 3 in the vicinity of St Peter's, document EX/CYC/50 April 2021
- D Modifications to Green Belt Boundary south of Joseph Rowntree Secondary School proposed April 2021 PM 81

## APPENDICES

1. St Peter's School Site Development Justification: Director of Operations
2. St Peter's School 10 year Master Plan: Appraisal of school building stock and the need to replace and/or augment provision 







## EXECUTIVE SUMMARY

### The Basis of The Representations: Soundness and Legal Compliance

- I. These representations conclude that:
- The Emerging Local Plan is unsound in relation the inner green belt boundary proposed around existing school buildings on the southern side of the campus of St Peter's School, York.

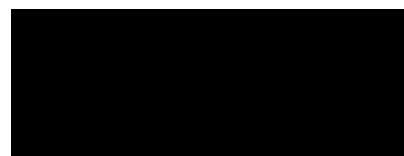
Changes required are to:

- Use as the green belt boundary, the obvious and well defined boundary provided by the large 4m high flood defence barrier which runs south-east to north-west, south of the built campus but bisects the western sports pitches.

See plan 6 attached.

Key diagram EX/CYC/46 is therefore unsound in this respect.

- On the matter of Legal Compliance, we make no representations on this aspect.
  - On the matter of Duty to Co-operate, we make no representations on this aspect.
- II. The proposed green belt boundary around St Peter's School southern campus does not correctly interpret and apply the requirements of NPPF 2012 para 85 in that the City Council has:-
- Not ensured consistency with the Local Plan strategy for meeting identified and known requirements for sustainable development
  - Not satisfied themselves that the Green Belt boundary will not need to be altered at the end of the development plan period
  - Not defined boundaries clearly, using physical features that are readily recognisable and likely to be permanent and





- Included land which is not necessary to keep permanently open

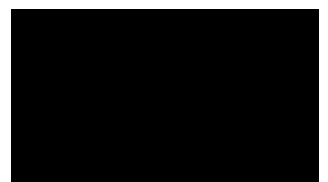
III. These representations are made in relation to Local Plan documents EX/CYC/59, EX/CYC/59c, EX/CYC/59h and EX/CYC/46. They concern the flawed justification for the inner boundary of the green belt proposed by the Council for two obvious matters which undermine the soundness of the plan unless rectified: -

- A. The Council has disregarded its obligation to make an evidence based assessment for meeting identified requirements for sustainable development for the School within the plan period, prior to proposing inner boundaries to the green belt. Its draft policies support educational institutions at each age level in Section 7 of the Submission Local Plan, and its statement in para 7.1 says:

*“Building on recent years’ investment in the city’s education 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”*

The School is certainly an exceptionally strong educational facility and is going from strength to strength. Despite this, the development requirements of the School have not been sought by the Council. Nonetheless, they are contained in this evidence.

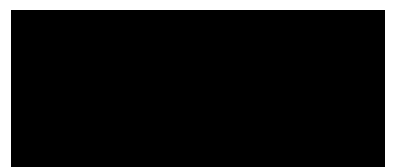
- B. The Council’s proposed green belt boundary hugs the southern edge of the buildings in the lower campus, around buildings and voids between buildings, like a doily. This is despite the fact that many of the buildings are inefficient and no longer fit for purpose and the likely replacements are unlikely to be in the exact same position due to the need for the school to function throughout building projects, thus replacements will need to be on an alternative site within the campus.



A green belt boundary is required to use physical features that are readily recognisable and likely to be permanent, the current proposal demonstrably fails to achieve this. Instead, a strong and recognisable boundary is presented by the adjacent 4m high flood prevention barrier which is definitely permanent and meets the requirements for designating green belt boundaries.

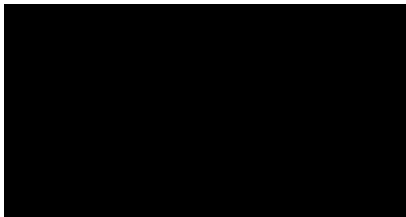
- IV. For the School, Document EX/CYC/59c INNER BOUNDARY SECTION 3, boundaries 8 to 12 are proposed, (attached plan C). Modification PM75 is relevant (attached plan B. This plan also shows the previous boundary proposed by the Council in June 2019 which excluded hard surface pitches from the green belt. No logical reason has even been provided by the Council for its change of position since 2019.
- V. In terms of the purposes of green belt, the campus is patently not countryside, it is a busy institution with over 1200 students and buildings and sports pitches to serve the School community. It is an active business and, in common with other such educational institutions, it needs to use its site for the benefit of the School.

Due to the significant impact of the flood prevention barrier, it serves the purpose of preventing intrusion into countryside effectively. The School grounds are not intended for this purpose, and do not need to be. The river corridor protects the character of the historic city which 1960s former Council buildings on the lower campus are not able to do.

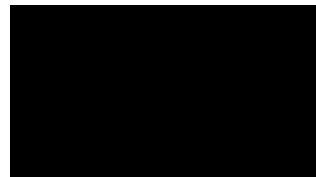
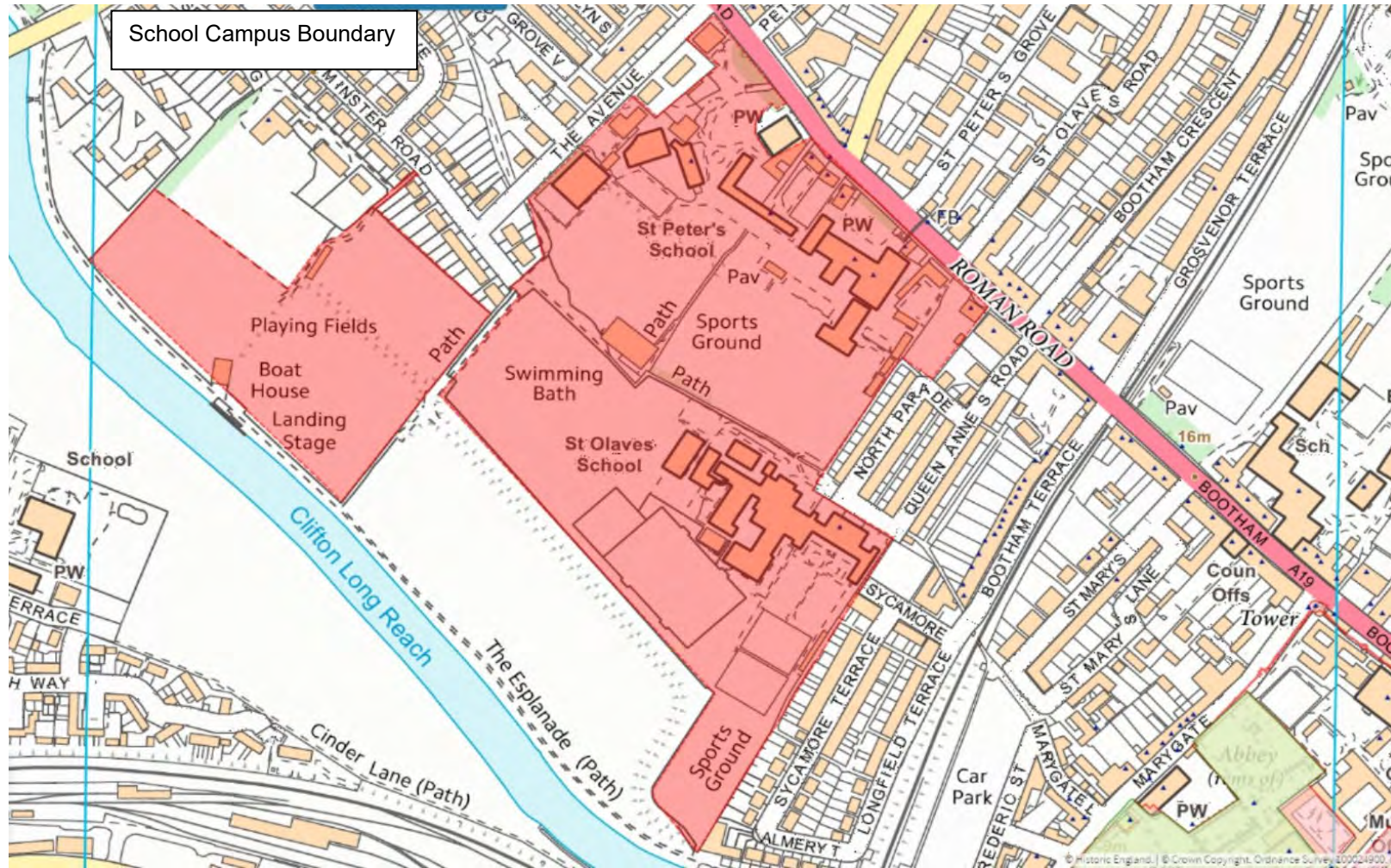




School Campus Boundary -Satellite View









## 1. THE BASIS OF THE REPRESENTATIONS

1.1 These representations are made in relation to Local Plan documents EX/CYC/59, EX/CYC/59c, EX/CYC/59h and EX/CYC/46. They concern the proposed modification of the proposed inner boundary Green Belt within the campus of St Peter's School, Clifton, York YO30 6AB. The Council's latest proposed modification PM75 is contained within attachment B at the end of this statement. The proposed Green Belt boundary encloses the built footprint of the southern school buildings in an illogical 'doily effect'.

1.2 Our assertion is that the boundary does not correctly interpret the requirements of NPPF 2012 para 85 in that the City Council has:-

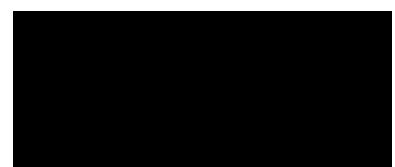
- Not ensured consistency with the Local Plan strategy for meeting identified requirements for sustainable development
- Included land which it is unnecessary to keep permanently open
- Not satisfied themselves that the Green Belt boundary will not need to be altered at the end of the development plan period and
- Not defined boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

## 2. THE NATURE OF EDUCATIONAL CAMPUSES

2.1 A school, in line with further and higher education institutions, is not a static entity. Its activities and its estate evolve over the years and decades from aspects such as:

- Increased demand for school places requiring increased capacity
- Requirements of the changing curriculum
- Buildings have become no longer fit for purpose from physical condition, capacity, location etc
- Running costs: energy efficiency, availability of natural lighting, natural ventilation, insulation etc

2.2 A school therefore needs space to meet the changing demands on its estate. To replace a building requires decant space such as a site for the new building and later demolition of that being replaced. New capacity needs space to locate a building. Any new

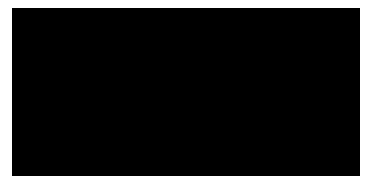


development needs wide clearances around the construction site to allow the school to function safely during the construction period. The construction site needs a contractors' compound and storage area.

- 2.3 For all of these reasons a school needs space. To remove part of its existing site and place it into Green Belt inhibits its abilities to meet its needs for sustainable development. This is particularly inequitable as other city schools in urban locations have no such constraints.

### 3. ST PETER'S SCHOOL

- 3.1 St Peter's is a co-educational independent school with a very long history, it is the oldest school in England outside of Kent. It comprises three elements, the senior, preparatory and pre-preparatory sections which are all on one campus. The 17.4ha site is located on the northern bank of the River Ouse, with a high flood bank running east-west to the south of the campus. The site is sub-divided by an east-west public right of way with the senior school, St Peter's, and pre-preparatory school, Clifton, to the north and the preparatory, St Olave's school to the south. A range of sports pitches lay in the northern section, and on the south and west sides of the southern section. The School caters for over 1200 day and boarding students; 48% currently have a home address within the City Council boundary and 91% have a home address within 25 km of the site. It is therefore an important educational facility for a significant number of families within the administrative area of the City.
- 3.2 The School is extremely popular and over-subscribed. It offers a wide curriculum and many out of classroom activities. It is also involved in the local community such as the Minster choir being based at the School, and sports activities off site. It joins a group of high quality schools in the city that contribute to the Council's objective of creating world class education in the city. The strong sports ethic results in the pitches being heavily used and as such artificial pitches are valuable such that there is an aspiration to construct additional facilities.
- 3.3 The built heritage of the School means that conserving listed buildings is part of its role in retaining the character of the historic city. When the St Peter's took over the redundant former Council owned Queen Anne's Girls Grammar School, it inherited the





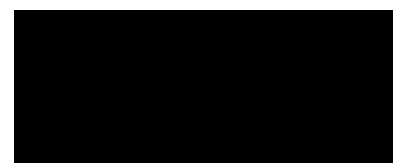
listed Brierley building which was the original school building which is grade II listed. At the time the City Council was marketing the school for redevelopment, but St Peter's acquisition of it ensured that it remained in education use, thereby facilitating its original use. This has given the building a new occupier for the use for which it was designed, and which would otherwise have been lost.

- 3.4 Appendix 1 provides an overview by the School of its history, character and strategic vision. Its vision is directed towards improving the built and sports facilities so that they match up to changing requirements of the curriculum, the needs of the student community and to meet new agendas such as energy efficiency and sustainability.
- 3.5 Appendix 2 provides information on the nature and condition of St Peter's estate, identifying constraints. The senior school is located within the Clifton conservation area and a significant proportion of the buildings are listed, so that the historic context inhibits the ability to make changes to the estate, (Appendix 2 plan 2). The preparatory school was built as Queen Anne Girls Grammar School but declared redundant and purchased by St Peter's in 2001. It has a single listed building but the majority of its buildings are not of high quality and do not meet current standards of energy efficiency or space efficiency. (Appendix 2 plans 3 and 4.)
- 3.6 The appendix sets out a high-level master plan to carry out necessary improvements and additions to meet the challenges that the School faces.

#### 4. PLANNING POLICY CONTEXT

- 4.1 The emerging Local Plan Submission Version May 2018 addresses education in Section 7. It states at para 7.1:

*"Building on recent years' investment in the city's education 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."*



## 4.2 Policy ED6 states:

*"The provision of sufficient modern education facilities for the delivery of pre-school, primary and secondary school education to meet an identified need and address deficiencies in existing facilities will be facilitated. New and enhanced education facilities will be permitted if they:*

- i. Are in locations that are accessible by sustainable means of transport from the communities they are intending to serve and not have a significant adverse impact on the amenities of neighbouring property;*
- ii. Have sufficient and appropriate playing field provision or take opportunities to deliver additional playing fields for existing schools identified as having a deficiency, as part of new development immediately adjacent to or near the schools; and*
- iii. Provide community access, through good design and modifications, to their facilities in areas where there are deficiencies of community leisure and sports facilities."*

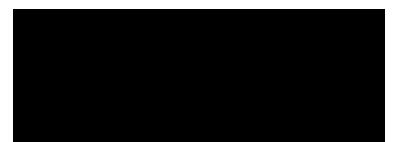
## 4.3 Para 7.19 states:

*"Providing sufficient and suitably modern accommodation will help to increase educational attainment to equip communities and local people with the right skills for the jobs available, both now and in the future. As such proposals for additional educational facilities will be welcomed by the Council if requirements are identified following assessment of need, and for academies and maintained schools if their development reflects the aspirations of local communities."*

## 4.4 The policy guidance in the NPPF supports school provision. It states at Para 72, in the section on Promoting Healthy Communities:

*"The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive approach to meeting this requirement, and to development that will widen choice in education. They should:*

- give great weight to the need to create, expand or alter schools; and*



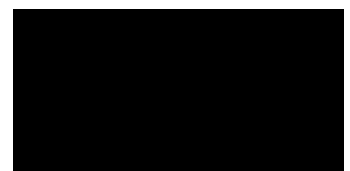


- *work with school promoters to identify and resolve key planning issues before applications are submitted.”*

## 5. MODIFICATIONS PROPOSED TO GREEN BELT BOUNDARIES

- 5.1 The topic paper TP1 is titled Approach to defining York's Green Belt ADDENDUM January 2021 (EX/CYC/59). Section 4 addressed the local plan strategy and development needs, in compliance with NPPF 2012 para 85 which requires local councils to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development. Paras. 4.47–4.50 (page 21) addresses the need of development related to education. However, this is a high level assessment of the need deals solely with additional pupil places and does not refer to existing schools' need to update or expand their estate.
- 5.2 Section 7: Methodology: Channelling Development to Urban Areas is again high level related to educational provision, Paras. 7.22-7.24, (page 57). Section 10: Enduring Boundaries and Safeguarding addressed educational provision again at high level in Paras. 10.24 and 10.25.
- 5.3 Thus, despite a silence in the modified documents subject to this public consultation on the requirements of existing schools to be able to expand and remodel as their needs define, and despite policy ED6 supporting the needs of schools to carry out developments, the Council is proposing exceptionally tight Green Belt boundaries around existing school buildings where schools are co-located with the general extent of the Green Belt. Other schools with an urban location have no such constraints on their scope to carry out developments.
- 5.4 The secondary schools which are also affected by this unjustified at Joseph Rowntree and St Peter's, primary schools so affected are Burton Stone, Elvington, Heslington, Poppleton, St Barnabas and Stockton-on-Forest out of a total of 67 schools, including 5 independent schools, plus York College, a VI Form and Further Education College. Local plan modification proposals for Joseph Rowntree School and St Peter's are included in attachments D and B at the end of this statement.

## 6. DETAIL OF GREEN BELT BOUNDARY PROPOSALS FOR ST PETER'S SCHOOL



6.1 The emerging local plan has in all versions shown the whole of the northern part of the school site allocated yellow for education, including the pitches. For the southern part of the school site, the proposed designations have been altered several times.

- In the publication version June 2018 the Green Belt bounded the buildings and a section of the sports grounds south to the flood bank. The pitches on the eastern boundary and those to the north-west were shown as existing open space within the Green Belt, (PM 30, attachment A). The justification was:

*“to represent completed planning permissions. Although the changes to the layout of the sports provision at St Peter's School are deemed appropriate uses within the Green Belt they may have an urbanising influence on the area which needs to be reflected.”*

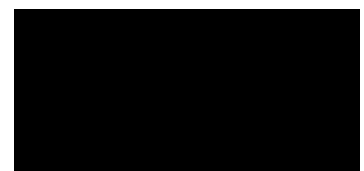
- This was modified in the Proposed Modifications June 2019 PM30 to utilise part of the flood bank as a southern Green Belt boundary so that the all weather pitch and tennis courts were included in the education allocation. The schedule stated:

*“Although the changes to the layout of the sports pitches at St Peter's School are deemed appropriate uses within the Green Belt they may have an urbanising influence in the area which needs to be reflected.”* (page 32) (attachment A).

- The current Proposed Modifications April 2021 PM75 shows the proposed Green Belt boundary now tightly enclosing the school buildings so that no open land is excluded from Green Belt. The sports pitches are shown as existing open space within Green Belt, (page 49) (Attachment B).

6.2 Document EX/CYC/59c Topic Paper 1 Green Belt Addendum January 2021 Annex 3 Inner Boundary Part 1 Sections 1-4 considers St Peter's School in Section 3 Boundary 8 to 13. This is shown on Inner Boundary Section 3 plan (attachment C), and in detail in the schedule pages 199 to 240. The justification for the tight Green Belt enclosure of the southern school buildings is given as:

- Purpose 4 Preserving the setting and special character of historic towns
- Purpose 1 Checking unrestricted sprawl
- Purpose 3 Safeguarding the countryside from encroachment





## 7. ASSESSMENT GREEN BELT PURPOSES

### 7.1 Purpose 3

The basic premise of the Council's case is that the playing fields on the southern side of the school campus are part of the "countryside". This is plainly wrong to even the most cursory visitor. To the contrary, this is an active, busy school campus with facilities for its 1217 students. With the School's reputation on sports achievements their facilities are well used. This requires lighting to be installed on the all-weather pitch and a second illuminated pitch providing. Illuminated pitches are considered an urbanising feature and not appropriate in Green Belt.

### 7.2 Purpose 1

Educational development on an existing school site cannot be rationally considered as threatening "unrestricted urban sprawl". This is a defined site with a specific use. In addition, there is a circa 4m high flood bank to the south of the school campus, which is circa 15m wide at its base. It is difficult to imagine a more dominant and permanent Green Belt boundary, in contrast to the weak and illogical boundary proposed by the Council.

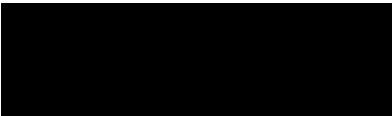
### 7.3 Purpose 4

Preserving the setting and special character of historic towns is acknowledged as a strong factor in defining the inner boundaries of the city's Green Belt. However, the River Ouse corridor to the south of the flood bank fulfils this function in a powerful way. Views into the city centre from the river corridor are uninterrupted by the southern part of the School campus. Changes to the campus would be "behind" the flood bank and would be seen, if at all, against the setting of the raising ground up to the listed buildings on the norther edge of the site. They would be of low impact not damaging the setting and special character of the city.



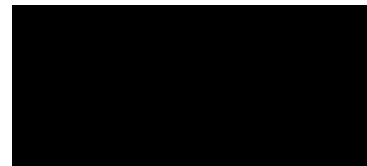


Photography Viewpoints



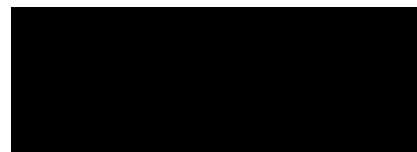


Photograph 1



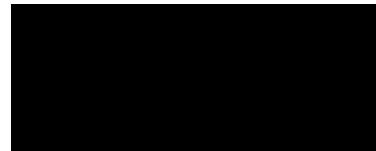


Photograph 2



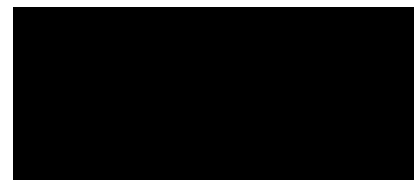


Photograph 3



7.4 Para 85 of the NPPF 2012 advises on the defining of Green Belt boundaries. This advice is not followed in the definition of a proposed boundary around the School.

- **Ensuring consistency with the Local Plan strategy:** The proposed boundary is drawn tightly around the southern campus' building footprint, removing development potential, even for additional all weather pitches with lighting. This has taken no account of the legitimate and known needs of the School to replace and augment their current built estate nor the need for decant space to develop additional floorspace yet keep the School operational throughout. The Local Plan policy ED6 supports new and enhanced educational facilities so that there is inconsistency with the Local Plan strategy.
- **Ensure permanence in the boundaries proposed:** The Council's boundary modifications have proposed a 2-tier approach to school campuses in that those adjacent to the Green Belt are proposed to have their undeveloped campus space washed over by Green Belt, whilst schools wholly within the urban area have their whole campus allocated for educational use. This is inconsistent given that all schools should have the same acknowledgement of their need to replace and/or augment their building provision over time. The proposed Green Belt boundary unreasonably inhibits the scope of these Green Belt schools to cater for legitimate growth and enhancement, thus pressure to revise the Green Belt boundaries to allow such growth will become immediate. For reasons set out in the appendices to this statement – the need for such development is known and undisposed, which renders the approach of the Council unsound and unjustified. This threatens the permanence of the boundaries.
- **Define boundaries clearly using physical features that are readily recognisable and likely to be permanent:** The eastern section of the southern boundary of St Peter's estate runs along the northern edge of the Lower Bootham flood defences. This flood bank has been recently raised and is now 4m high and 15m wide at its base. This is an exceptionally strong physical feature that is readily recognisable and very likely to be permanent. In contrast, the 'doily effect' of the Council's proposed boundary around the current building footprint is not permanent since buildings can be extended or demolished and replaced over the plan period. The amendments to Part 7 class M of the GPDO (2015) which





came into force on 21 April 2021 is a case in point since it allows for extensions etc to schools by up to 25% of their April 2021 footprint without planning permission provided that the works are not located on playing fields.

- **Not include any land which is unnecessary to keep permanently open:** The dominating flood bank obstructs views into the southern part of the St Peter's campus so visually severing it from the river corridor and public open space to the south, which are clearly defined. In this circumstance, there can be no justification to include the school's land north of the bank in the Green Belt.

7.5 The Council asserts that the southern campus fulfils three purposes of Green Belt, namely:

- o To check the unrestricted sprawl of large built-up areas
- o To assist in safeguarding the countryside from encroachment
- o To preserve the setting and special character of historic towns

In reality, the land fulfils none of these purposes and therefore there is no justification to place the School's southern area within the green belt in order to ensure that the land remains 'permanently open'. To the contrary the flood bank is the appropriate barrier. The western sports pitches to the south of the flood bank are accepted to be included within the Green Belt since they are viewed together with the land adjacent to the river.

## 8. INNER BOUNDARY SECTION 3 BOUNDARIES 8-13 PROPOSED AMENDMENT

8.1 The logical location for the Green Belt boundary north of the River Ouse is the massive flood bank which is dominant and permanent. It is shown on plan E attached and plan 6 in Appendix 2. The boundary would run from the western end of Almerly Terrace north-westwards. It would run between the western School playing fields until it reaches the rear of properties on the Government House Road, then run south to the river footpath.

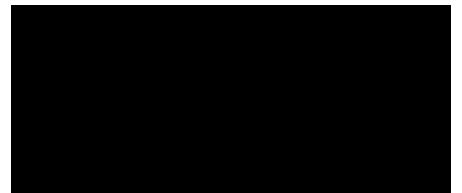
[REDACTED]

[REDACTED]

[REDACTED]

## ATTACHMENTS

- A CYC Modifications to Green Belt Boundary south of the School June 2019 PM30
- B CYC Modifications to Green Belt Boundary south of the School April 2021 PM 75
- C Inner Boundary Section 3 in document EX/CYC/50
- D Modifications to Green Belt Boundary east of Joseph Rowntree Secondary School April 2021 PM
- E Green Belt boundary proposed by St Peter's School





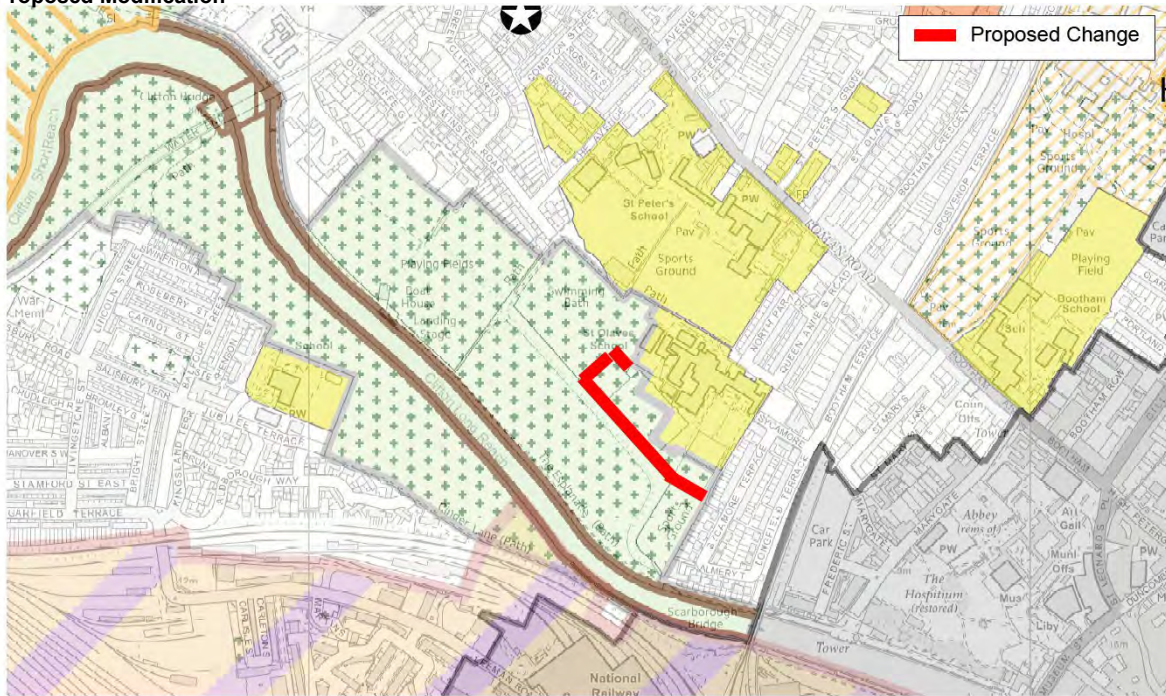
ATTACHMENT A

City of York Local Plan Proposed Modifications (June 2019)

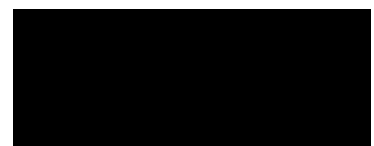
PM30: Rear of St Olaves and St Peters School Policies map boundary (2018)



Proposed Modification



See key on page 55





City of York Local Plan Proposed Modifications (June 2019)

Local Plan Publication Draft Policies Map February 2018 Key

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




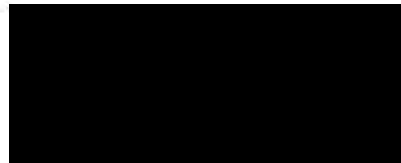
City of York Local Plan Proposed Modifications (June 2019)

Modification Reference Number	Plan Location	Proposed Modification	Reason for Changes
<b>PM29 -</b> Policies Map Green Belt Change – Moor Lane, Woodthorpe	Policies Map South –  (See map extract on page 56 of this document)	Proposed detailed inner Green Belt boundary modification – it is proposed that the boundary should follow the carriageway to the south of Moor Lane, as opposed to the north side of the road, as it is presented on the submitted policies map.	Consistency:  The methodology indicates that where the metalled surfaces of roads are in proximity to urban uses they should be considered to form part of the built up area.  See justification as set out in TP1 – Annex 3, Inner Boundary Section 1 Boundary 2.
<b>PM30 -</b> Policies Map Green Belt Change – rear of St Olaves and St Peters School.	Policies Map North –  (See map extract on page 57 of this document)	Proposed detailed inner Green Belt boundary modification – it is proposed that the boundary should follow the existing built sports provision in preference to the current line which no longer matches physical features on the ground.	To represent changes since the boundary was drafted and to reflect completed planning permission.  Although the changes to the layout of the sports provision at St Peters School are deemed appropriate uses within the Green Belt they may have an urbanising influence on the area which needs to be reflected.
Modification Reference Number	Plan Location	Proposed Modification	Reason for Changes
			The proposed line offers a more robust boundary to the Green Belt in this location with a greater degree of permanence being offered. The line currently presented on the policies map no longer relates to any physical structures.  See justification as set out in TP1 Addendum – Annex 3, Inner Boundary Section 3 Boundary 9,

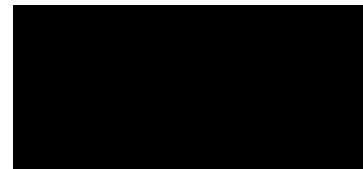
ATTACHMENT B

City of York Local Plan Proposed Modifications (April 2021)

Modification Ref: PM 75	Proposed Detailed Inner Green Belt Boundary Modification		
	Document location	Name of Area of Change	Evidence base location
	Policies Map North	PM75 St Peters School	TP1 Addendum Annex 3 Section 3 Boundary 9
<b>Proposed Modification</b>			<b>Reason: Consistency with the Green Belt methodology .</b>
			
<p>Reproduced from the Ordnance Survey mapping with the permission of Her Majesty's Stationery Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. City of York Council. Licence No. 1000 20818</p>			
<p>It is proposed that the green belt boundary should follow the built edge of the school buildings</p>			







Key to Policies Map extracts


**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
-  Nationally Significant Nature Conservation Sites  
(SAC/SPA/RAMSAR/SSSI)
-  Site of Importance to Nature Conservation  
(SINC)
-  Candidate Site of Importance to Nature Conservation  
(Candidate SINC)
-  Local Nature Reserve (LNR)






**Managing Appropriate Development in the Green Belt (Section 10)**

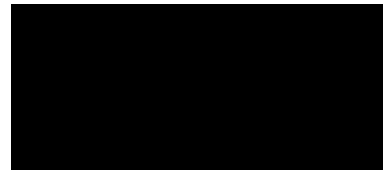
-  Greenbelt

**Waste and Minerals (Section 13)**

-  Household Waste and Recycling Sites

**Transport and Communication (Section 14)**

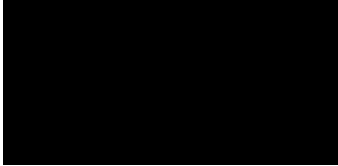
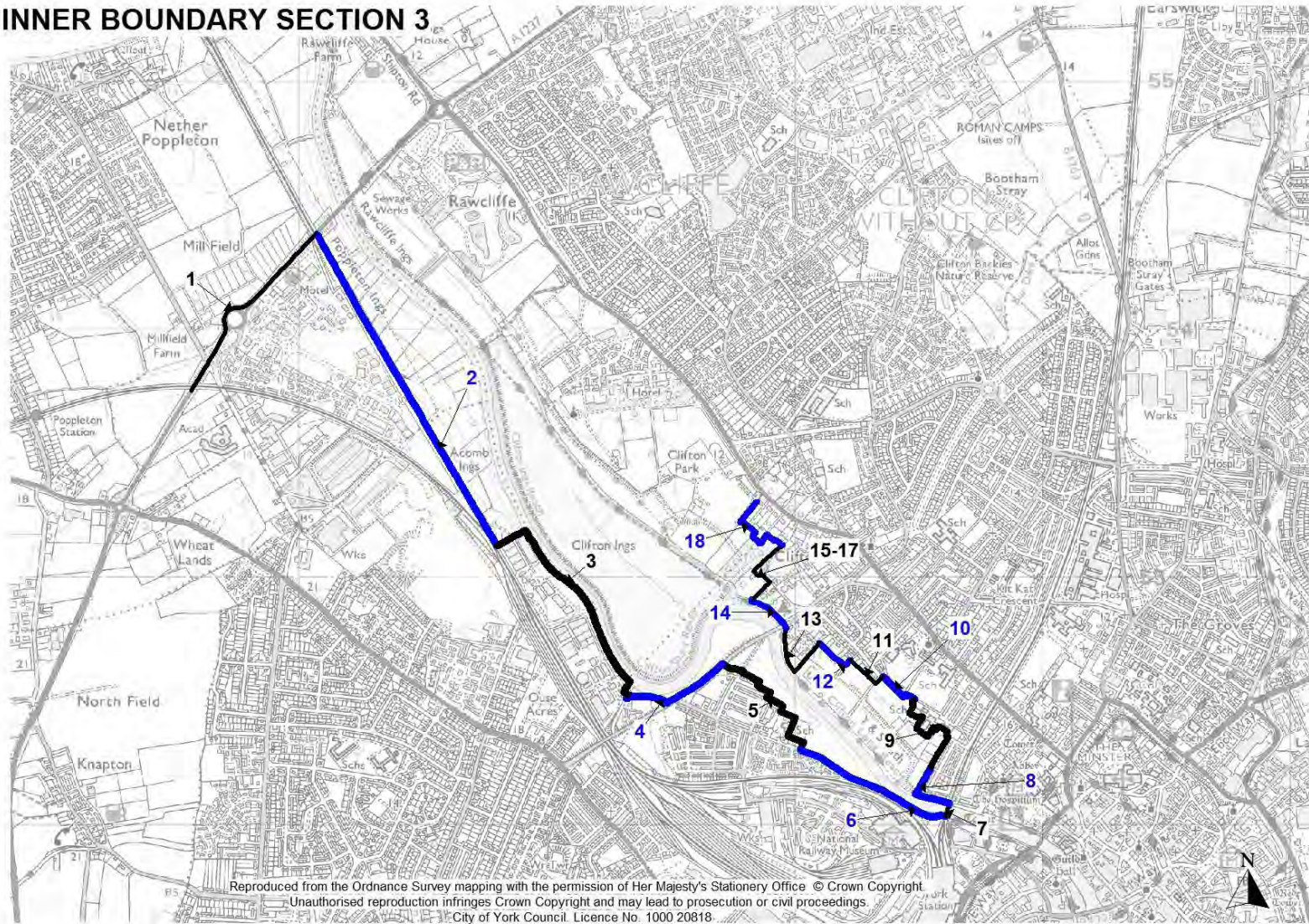
-  Proposed New Railway Stations
-  Existing Park and Ride
-  Existing Park and Ride with Potential for Relocation
-  Existing Park and Ride with Potential for Expansion
-  Potential New Bridge/Enhancement
-  Proposed Roundabout Junction Improvements
-  Proposed Strategic Junction Improvements
-  Land Safeguarded for Potential Future Transport Schemes
-  Strategic Pedestrian/Cycle Corridor Improvements





ATTACHMENT C

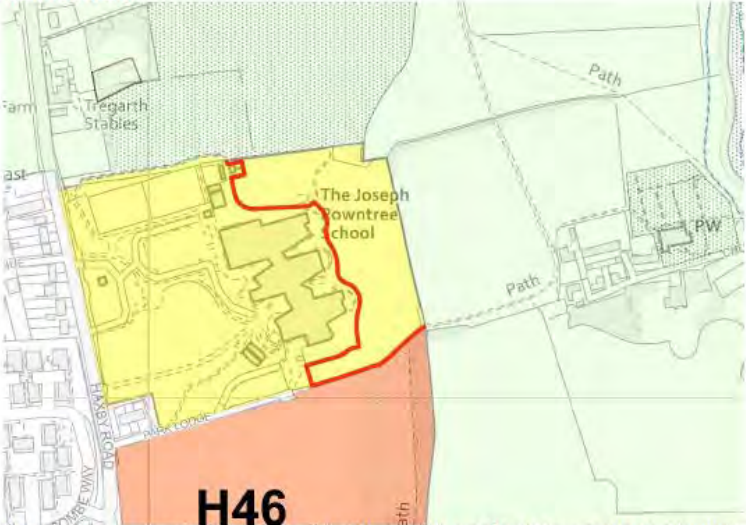
**INNER BOUNDARY SECTION 3**

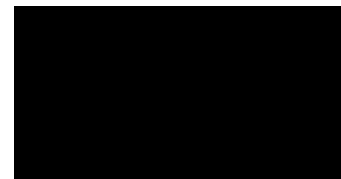




ATTACHMENT D

**City of York Local Plan Proposed Modifications (April 2021)**

Modification Ref: PM 81	Proposed Detailed Inner Green Belt Boundary Modification		Evidence base location
	Document location	Name of Area of Change	
	Policies Map North	PM81 Joseph Rowntree School	TP1 Addendum Annex 3 Section 5 Boundary 9
<p><b>Proposed Modification</b></p>  <p>Reproduced from the Ordnance Survey mapping with the permission of Her Majesty's Stationery Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. City of York Council. Licence No. 1000 20818</p>			<p><b>Reason: Consistency with the Green Belt methodology</b></p>
<p>It is proposed that the green belt boundary should follow the built edge of the School</p>			







Scale: 1" = 100'

Proposed Boundary of Green Belt

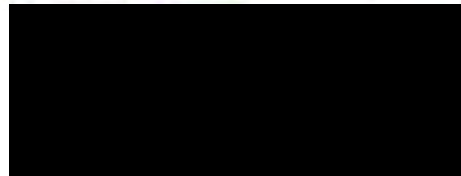
DATE	11/10/11
BY	SPD
CHKD	SPD

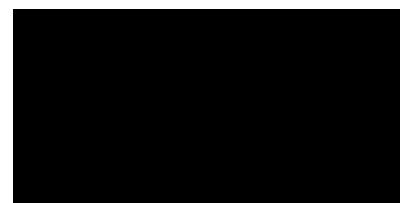
Client  
St Peter's School, York

Project No.  
Master Plan

Drawing No.  
Proposed Greenbelt  
Boundary

DATE	11/10/11	BY	SPD	CHKD	SPD
PROJECT	SPD	DATE	11/10/11	BY	SPD









# St Peter's School YORK

## **The Development of the School Estate to Meeting Educational Objectives**



May 2021

## Contents

<b>A</b>	<b>Introduction</b>	<b>3</b>
	Site History	4
	Numerical Growth	5
<b>B</b>	<b>Strategic Vision</b>	<b>5</b>
<b>C</b>	<b>Challenges and Constraints of the Physical Estate</b>	<b>6</b>
	Listed Buildings	6
	Legacy Buildings	7
	Large Indoor Spaces	8
	Physical Relationship and Relative Location of Buildings	8
	Duplication and Consolidation	9
	Compact Site	9
<b>D</b>	<b>Conclusion</b>	<b>10</b>





## A. Introduction

01. Founded in 627AD in the same year as York Minster, St Peter's School is the oldest school in England outside Kent and the fourth oldest school in the world. Today, the school is a leading independent co-educational day and boarding school for boys and girls aged 2-18. Our shared foundation and close connection with York Minster was strengthened in 2020 when we became their choir school.
02. The 19 hectare school estate is located in Clifton to the north-west of the city. The three schools that now form St Peter's are located on the site, St Peter's 13-18, and St Peter's 2-8 (formerly Clifton School) on the northern side and St Peter's 8-13 (formerly St Olave's School) on the southern side adjacent the river.
03. The School's vision is to prepare pupils for confident, successful and fulfilled adult lives and to have a positive impact on their world. St Peter's School, York is The Sunday Times North Independent Secondary School of the Year 2019. St Peter's School was also named Prep School of the Year and Independent School of the Year at the TES Independent School Awards 2021. The School is consistently oversubscribed and, in the future, would like to be able to accommodate more children who can benefit from all St Peter's has to offer.
04. St Peter's is renowned for academic excellence, with an 85% A\*- B pass rate at A-level and a 92% 9 – 5 pass rate at GCSE in 2019. The School is also renowned for the co-curricular opportunities for all ages and levels, with over 80 different activities available for pupils to enjoy.
05. Music is a particular focus for pupils at St Peter's. As well as the York Minster choristers, we have ensembles, choirs and individual lessons taking place throughout the school. In 2019 our senior Chapel Choir made it to the final of the National Choral Competition at the Royal Festival Hall. Drama is also a popular activity ranging from individual LAMDA classes, to small studio productions and to whole school productions with a cast and crew of hundreds and our assembly halls transformed into fully operational theatres.
06. St Peter's is well known for its achievements in sport, from beginners to elite levels. Our teams have made national finals in all sports, most notably our girls' hockey team who participated in the finals of the national schools' tournament and our rugby team who won the Rosslyn Park Sevens. Sporting talent at St Peter's is home grown and success comes from wide participation in team sports and a dedicated coaching team.
07. Our Help With Fees programme creates opportunities for those who could not otherwise afford an independent school education to join our community and are working with City of York Council to extend our provision to more children in the city. We are represented on the York Early Years Partnership and host an annual Learning Conference for teachers across the region. Staff are engaged in links with local schools, including governance positions and outreach initiatives.

08. St Peter's is a member of the York Independent State School Partnership and works in partnership with the Royal National Children's Springboard Foundation. We share our campus and facilities with community groups such as York City Baths Club, York Hockey Club, Vineyard and Christ the Light Churches, York Musical Society, YEDFAS, MENCAP, and even Glaisdale Hunt Pony Club, to name a few. We also host regular lectures which are available free of charge to the public and provide venues for organisations such as the York Literature Festival, the York Festival of Ideas and the Institute of Physics to host lectures and talks.
09. The Independent Schools Council Economic Impact Report (October 2018) calculated that the school made an annual contribution of £15.7m to the local economy.

### Site History

10. Though founded in 627, the school has been on its current site since 1844. St Olave's School, founded in 1876, joined St Peter's in 1901 and moved from its home in Bootham on to the main school site in 1934. Clifton School joined the St Peter's family in 1994, located on The Avenue across the road from the current school site.



*York Proprietary School 1838-1844*

11. In 2001, the former Queen Anne Girls' Grammar School, which had been operated by the City Council came onto the market. At the time it was being proposed by the Council for redevelopment, however it provided an ideal opportunity for St Peter's to expand its estate, which at the time was highly constrained. Following a successful bid, St Olave's School moved into the majority of the former Grammar School, with St Peter's senior school spreading out and occupying the 3 storey "C Block". Clifton School relocated into the Chilman building which had been purpose built for St Olave's in 1989, and the land on the other side of The Avenue sold to facilitate the purchase of Queen Anne's.





*St Peter's 2-8 in the North West of the campus*

12. The current school is centred on three separate areas of the campus. St Peter's 13-18 on the historic northern part of the campus, St Peter's 2-8 (Formerly Clifton School) in the north-west corner of the site primarily in a mixture of historic and more recent educational buildings, and St Peter's 8-13 (Formerly St Olave's) on the south east of the campus located in the former LEA Girls Grammar School, which itself had expanded into numerous low cost post war additions to the original 1908 listed building before it closed. Three boarding houses are situated nearby on adjacent streets within short walking distance of the main school campus.

## **Numerical Growth**

13. In 1901, the joining of St Olave's school to St Peter's added 70 pupils to the 69 boys recorded at St Peter's in 1900. A century later, in 2001, when the three sections of the school were all brought together on one enlarged site, Clifton school had a roll of 125 pupils aged 3-8, St Olave's 336 pupils aged 8-13 and St Peter's had 492 students aged 13-18, with a grand total aged 3-18 of 953. In the following two decades numbers have steadily increased to 1217 in May 2021 now aged from 2-18 years.
14. Currently 48% of pupils attending the school have a home address within the CYC boundary (58% if you include boarding pupils who live on site). 91% of all pupils have a home address within a 15 mile radius of the School. It follows that the school provides an important educational facility to a significant number of children of families who live within the City Council's administrative area.

## B. Strategic Vision

15. The strategic aim of the school is to further develop the provision of excellent independent education for pupils aged 2-18. The school is a dynamic institution, ever changing and evolving as the curriculum develops, pupil numbers grow and as various requirements demand, for example changing educational needs, legislation, compliance issues or a desire for energy efficiency and a drive for increased sustainability.
16. An innovative and creative campus development master plan has been developed to deliver a comprehensive range of facilities required to facilitate the above and to secure the school into the foreseeable future.
17. The plan addresses obvious shortcomings with the school's current estate as well as ensuring that the site is updated in order to provide high quality academic learning spaces in which to deliver the needs of a contemporary and developing curriculum as well as expanded, state of the art, co-curricular facilities which are increasingly required particularly for sport, music and



*Pascal Building (Maths & Languages) Completed 2018*

performing arts. It also addresses the communal, pastoral and support space requirements ensuring they are more adequately and innovatively met.

18. St Peter's school has a vision to continue to steadily grow day and boarding school numbers up to 1400 from age 2-18 over the next 10 years. This limited growth will enable the school to more adequately meet the need of prospective parents, improve the pupil experience whilst still retaining the distinct St Peter's feel, pastoral model, educational ethos and school culture. It will also ensure that the school is more sustainable economically maximising the use of our assets but without outgrowing the site. Importantly this level of growth is considered to be around the maximum size that the school envisaged growing to. As well as the obvious limitations from the size of its estate, were the school to be any larger then it would risk jeopardising its ethos and the standard and quality of the education that it provides.
19. St Peter's School as custodians of a diverse estate for current and future generations recognises the importance of considering the long-term impact of decisions made today, particularly in relation to the development and use of the site. It is the desire of St Peter's School to be good



stewards of the resources it has, to be efficient with the resources required to run and develop the school, reducing our carbon footprint and minimising the impact we have on the planet. The school also recognises our responsibilities to those that surround us both minimising any negative impact it may have and maximising its potential use and benefit for the wider community.

## C. Challenges and Constraints of the Physical Estate

20. St Peter's has invested heavily in the campus, with over £7m spent on major building projects in the last few years. However, the site still has a number of significant challenges and a strategic plan has therefore been developed in order to overcome many of the constraints and obstacles to the continued success and the implementation of the vision of the school, has been drawn up. The primary challenges constraints are:

### (i) Listed Buildings

21. We are inheritors of a stock of beautiful grade II listed buildings, many of which were built in the early 19<sup>th</sup> Century, which dominate the northern part of the campus bordering the A19. These, along with the original early 20<sup>th</sup> Century Walter Brierley designed Queen Anne's Grammar School building, are however a challenge to maintain, inefficient to run, and also are limited in how they can be developed to be fit for purpose spaces for delivering a contemporary 21<sup>st</sup> Century curriculum. It will of course be noted that but for the intervention of the school that the listed building at the core of Queen Anne's Grammar School would have been sold for conversion for a non-educational use. It is therefore a source of pride that the school has been able to retain this listed building in the use for which it was originally designed.



*Northern part of the campus*

22. As custodians of these historically significant listed buildings, we strive to maintain them well, sensitively developing and utilising them. However, costs are high and development opportunities are limited, particularly in the constrained and congested northern part of the campus. Strategic development of other sections of the campus is therefore essential to enable growth but more importantly to secure the essential improvement of the school facilities to the required standard.

## (ii) Legacy Buildings



*Southern part of the campus, former Queen Anne's Girls' Grammar School*

23. We have inherited a significant stock of low quality, low density, post second world war buildings which are no longer fit for purpose and have in any event reached the end of their design life. The majority of these buildings are located on the south side of the campus and were built as extensions to the Queen Anne's Girls' Grammar School, and their redevelopment has been an ongoing project since they were first acquired from the City. They have now been adapted to various degrees for use as a coeducational independent preparatory school.
24. Those buildings, although well looked after, are no longer fit for purpose. They are typically poorly insulated, difficult and expensive to maintain and costly and inefficient to run. Many of them have flat roofs with inadequate drainage. Asbestos was a popular building material during this period and although much has been removed or contained, and all properly identified and under a strict management plan, the maintaining and developing of these buildings is a complex and expensive process.
25. On the northern side of the campus there are also some comparable buildings, with similar issues, constructed in the mid to late 20<sup>th</sup> century that were originally built to meet the needs of a boys boarding school. However, these buildings now serve a larger coeducational school



and often a much broader age range. For example, the Senior School Sports Hall and changing facilities was built in 1974 to serve 421 boys but is now required to serve the needs of a coeducational school Senior school of 569 and is also used by the 194 pupils at St Peter's 2-8. Its ancillary facilities are particularly sub-standard and in urgent need of replacement. Such facilities as well as being out dated no longer adequately meet the needs of the school community.

### **(iii) Large Indoor Spaces**

26. The existing large internal spaces in all three areas of the school are at capacity. The halls used for assemblies, chapels and for dining are often full on a daily basis and larger communal spaces are immediately required.
27. The chapel built in 1861 was reconfigured and had a balcony added in 1974 in order to seat 450. This now means that pupils and staff at the senior school cannot comfortably worship together. Regular communal worship is at the heart of the ethos of St Peter's School.
28. The Memorial Hall, extended in 1960 and further improved in 2012, has a capacity of 450 – 500 depending on configuration. The Hall cannot therefore comfortably seat a whole senior school gathering, and is frequently found lacking in capacity and sophistication for the huge range of internal and external events it is required to host.
29. The dining room at St Peter's has been evaluated by catering consultants who calculated that in the current space and time allocated it should cater for 450 covers. At lunchtime we currently feed up to 900 every day, which inevitably leads to long queues and significantly detracts from the dining experience.
30. It is essential that increased provision for the chapel, dining and assembly functions for the current school numbers, even without the anticipated growth. These problems have been particularly evident during the current crisis.

### **(iv) Physical Relationship and Relative Location of Buildings**

31. Due to the nature of the existing buildings on the northern campus and the evolutionary nature of the growth and development of the school, there is a clear need for the rationalisation and reorganisation of the campus to improve the efficiency of the site and its internal and external spaces. For example, some departments teach in classroom spaces distributed all around the site. This led to the proposed creation of "learning hubs" gathering departments and related subjects together. This became a key driver in the development of the recent award winning Pascal building which provides hubs for Mathematics and for Modern and Foreign Languages.
32. However, currently the sciences are spread over the campus, with Biology located at significant distance from Chemistry and Physics, and remote from other STEAM subjects such as DT, Art and Computer Science.

33. The school aims to further develop its facilities for teaching, in logical and strategic relation to each other, to foster cooperative and blended contemporary learning.

#### **(v) Duplication and Consolidation**

34. Due to the way that the school has developed, acquiring additional buildings and facilities over the years (most notably the acquisition of Queen Anne’s Grammar School in 2001), the school has now various facilities which are separated, duplicated, poorly located, and/or inadequate. Though much work to improve and rationalise the campus has been undertaken, there is still a significant need for consolidation, rationalisation and improvement of facilities. The development of new facilities for Sport, Music, Art, Drama and DT are prime examples of dated and low quality amenities which require a whole school development approach. The new master plan aims to provide more logically located, fit for purpose facilities that properly serve all sections of the school but are also designed and located to be more suitable and easily available for use by the wider community.



*Former Queen Anne’s Grammar School 1908-1910*

#### **(vi) Compact Site**

35. St Peter’s campus, compared to our many rural competitor schools, is a relatively small and compact 19 hectare site in the heart of a city. 15% of the campus is on the “wet” side of the flood defences. It is therefore essential to maximise the use of every area of the site, without compromising the open feel of the campus or reducing key outdoor green spaces and sports provision. The northern side of the campus is already well developed and further major construction is constrained by the number and density of listed buildings. The southern part of the campus, is however less densely built with greater scope to creatively develop and reconfigure the layout through the removal or refurbishment of the significant number of low quality and low density buildings and other facilities.



## D. Conclusion

36. The continuous and extensive improvement of the school site and facilities in the heart of York is essential to fulfilling the vision of the Board of Governors and ensuring the future success of St Peter's School.
37. Were the green belt boundary to be drawn as currently proposed by the City it would essentially ignore the evident and multiple needs of the school to secure the above improvements to its estate. It is highly regrettable that the City Council has not liaised properly with the School to understand its needs and sought to draw the green belt boundary accordingly. Whilst it is understood that green belt designation is not an absolute preclusion on development it nonetheless seriously undermines our ability to properly plan for known eventualities.
38. Should the green belt boundary be drawn in the most logical location – ie on the top of the newly increased in height flood defences then the school would intend to bring forward the masterplan within the next 15 years, thereby securing the future for the school as one of the City's key assets.
39. It is of paramount importance for the school to enhance and expand high quality educational facilities to ensure continued and improved educational excellence in an ever more competitive and challenging environment. The school is an evolving institution, with numerous existing constraints to developing the facilities as outlined above. The ability to redevelop and reconfigure the southern side of the campus in particular is seen as essential for the sustained success of the school without additional constraints, such as the proposed green belt boundary, which will clearly hinder unacceptably the reconfiguration and redevelopment of the whole site.



*View of the Southern campus from the north*



This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified of any discrepancy. This drawing is copyright and remains the property of McNeil Beechey O'Neill LLP.



1. First Team Cricket Field
2. 35x30 Cricket Nets / MUGA
3. First XV Rugby Pitch
4. Riverside Pitches
5. Colts Pitch
6. Wightman Pitch
7. St Peter's 8-13 Pitches
8. The Paddock
9. Tennis Court / Netball Court
10. Tennis Courts / Netball Courts
11. Tennis Courts / Netball Courts
12. Astro Turf
13. Tennis Courts / Netball Courts
14. St Peter's 8-13 Lawns
15. St Peter's Playground
16. St Peter's Play Area
17. St Peter's 8-13 Fitness Trail
18. St Peter's 8-13 Playground & Equipment
19. St Peter's 8-13 Quiet Garden
20. St Peter's 8-13 Playground Equipment
21. St Peter's Informal Spaces
22. Long Jump Pit
23. Boarding House Gardens

Client:  
St Peter's School, York

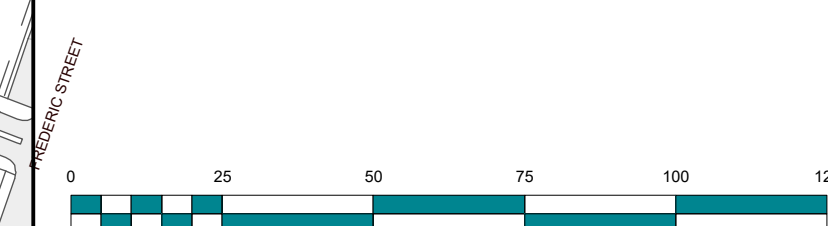
Project Title:  
Master Plan

Drawing Title:  
Existing Location Plan  
with Labelled Sports  
Pitches

Scale @ A1: 1:1250 Date: 18-05-21 Drawn: jch

Project Ref: SP06 Drawing No: 001 Stage: 1 Rev: b

File Ref: K:\Job\St Peters Site Survey Q3 2021







This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified of any discrepancy. This drawing is copyright and remains the property of McNeil Beechey O'Neill LLP.


### St Peter's School Listed Buildings & Clifton Conservation Area

- Grade II  
(in conservation area)
- In conservation area
- Outside conservation area
- Clifton York  
Conservation Area

1. Linton House (off campus)
2. Manor House (off campus)
3. Dronfield House (off campus)
4. Clifton & Grove Day House
5. The Lodge
6. School House (off campus)
7. Main Building St Peter's
8. Memorial Hall
9. Chapel
10. Library
11. Burton Cottage
12. Music School
13. Drama Centre and Music Annexe
14. Queens Building
15. Pavilion (P Block)
16. Science Block Old Chemistry
17. Science Block New Physics
18. St Catherine's
19. Pascal Building
21. CCF Building (St Olave's Site)
22. White House (Denison House)
23. Chilman Building
24. Estate Offices
25. Wentworth House
26. Clifton Dining Room
27. The Rise Boarding House
28. Sports Centre
30. Swimming Pool
31. Boat House
- 31a. Upper Boat House
32. STP 8-13 Main School (Formerly St Olave's)
33. St Olave's Art/Design & Tec
34. St Olave's Music Department
35. C Block (Senior Art & Biology)
36. Astro Changing Rooms
37. St Olave's Sports Hall

Rev	Date	Details	By

**mbo architects**



Castlegate House,  
28 Castlegate,  
York,  
YO1 9EP  
Tel: (01904) 495500  
Email: mbl@mboarchitects.co.uk

Client:  
**St Peter's School, York**

Project Title:  
**Master Plan**

Drawing Title:  
**Listed Buildings and  
Conservation Area**

Scale @ A1:  
1:1250

Date:  
18-05-21

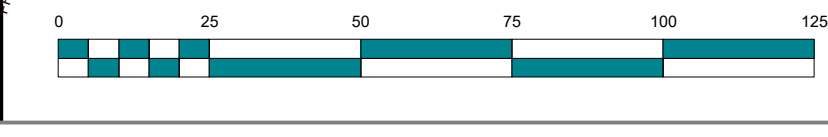
Drawn:  
jch

Project Ref: **SP06**

Drawing No: **002**

Stage: **1**

Rev: **b**





This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified of any discrepancy. This drawing is copyright and remains the property of McNeil Beechey O'Neill LLP.

### St Peter's School Building EPC Ratings

- A** 0-25
  - B** 26-50
  - C** 51-75
  - D** 76-100
  - E** 101-125
  - F** 126-150
  - G** Over 150
- 100 would be typical



**Client:**  
St Peter's School, York

**Project Title:**  
Master Plan

**Drawing Title:**  
Energy Efficiency Estate Plan

**Scale @ A1:** 1:1250    **Date:** 18-05-21    **Drawn:** jch

**Project Ref:** SP06    **Drawing No:** 003    **Stage:** 1    **Rev:** b

File Ref: K:\Job\St Peters Site Survey Q3 2021



This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified of any discrepancy. This drawing is copyright and remains the property of McNeil Beechey O'Neill LLP.




### St Peter's School Building Quality Index

- CAT A**  
Adequate
- CAT B**  
Inadequate
- CAT C**  
Residential

1. Linton House (off campus)
2. Manor House (off campus)
3. Dronfield House (off campus)
4. Clifton & Grove Day House
5. The Lodge
6. School House (off campus)
7. Main Building St Peter's
8. Memorial Hall
9. Chapel
10. Library
11. Burton Cottage
12. Music School
13. Drama Centre and Music Annexe
14. Queens Building
15. Pavilion (P Block)
16. Science Block Old Chemistry
17. Science Block New Physics
18. St Catherine's
19. Pascal Building
21. CCF Building (St Olave's Site)
22. White House (Denison House)
23. Chilman Building
24. Estate Offices
25. Wentworth House
26. Clifton Dining Room
27. The Rise Boarding House
28. Sports Centre
30. Swimming Pool
31. Boat House
- 31a. Upper Boat House
32. STP 8-13 Main School (Formerly St Olave's)
33. St Olave's Art/Design & Tec
34. St Olave's Music Department
35. C Block (Senior Art & Biology)
36. Astro Changing Rooms
37. St Olave's Sports Hall

Rev	Date	Details	By

**mbo architects**



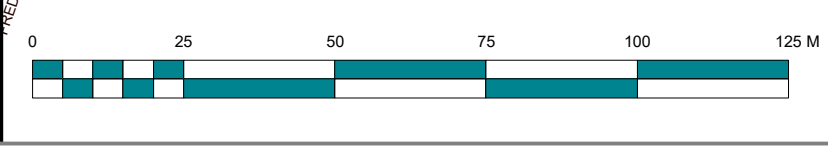
Castlegate House,  
28 Castlegate,  
York,  
YO1 9EP  
Tel: (01904) 495500  
Email: mbl@mboarchitects.co.uk

**Client:**  
St Peter's School, York

**Project Title:**  
Master Plan

**Drawing Title:**  
Building Quality Index

Scale @ A1: 1:1250    Date: 18-05-21    Drawn: jch  
Project Ref: SP06    Drawing No: 004    Stage: 1    Rev: b









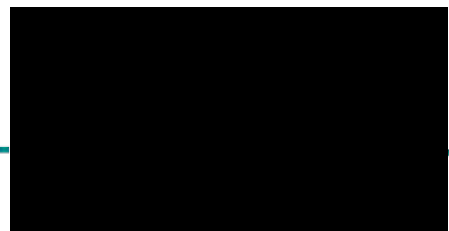




# St Peter's School, York



## 15 YEAR DRAFT DEVELOPMENT MASTER PLAN





# CONTENTS

<b>1</b>	<b>Introduction</b>	<b>4</b>
1.1	The Proposal	4
1.2	Site Location	4
1.3	The Campus	4
1.4	Master Planning Principles	5
1.5	Master Plan Document	5
<b>2</b>	<b>Site analysis</b>	<b>6</b>
2.1	Built Landscape and Physical Setting	6
2.2	Urban Context	8
2.3	School Facilities on Campus	10
		10
2.4	Facilities Off Campus	10
<b>3</b>	<b>Constraints &amp; Opportunities</b>	<b>11</b>
3.1	Identified Constraints	11
3.2	Identified Opportunities	11
3.3	Future Capacity for Growth	15
3.4	Traffic	15
3.5	Energy Efficiency	16
<b>4</b>	<b>Vision &amp; aims</b>	<b>17</b>
4.1	Distinctive	17
4.2	Permeable and Connected	19
4.3	Attractive	20
4.4	Sustainable Development	20
4.5	Safe	20
<b>5</b>	<b>Master Plan Guiding Principles</b>	<b>22</b>
5.1	Master Plan Concept	22
5.2	Key Features	22
5.3	Design Principles	22
5.4	Proposed Master plan	23
5.5	Building Typology	25
5.6	Landscape & Greenspaces	25

5.7	Biodiverse - Sustainable Development	26
<b>6</b>	<b>Summary</b>	<b>27</b>
<b>7</b>	<b>APPENDICES</b>	<b>28</b>
7.1	SP06-001 Existing Sports Facilities Plan	28
7.2	SP06-002 Listed Buildings & Conservation Area Plan	28
7.3	SP06-003 Energy Efficiency (EPC's) Estate Plan	28
7.4	SP06-004 Building Quality Index	28
7.5	SP06-005 Proposed Draft Master Plan	28
7.6	SP06-006 Proposed Greenbelt Boundary	28



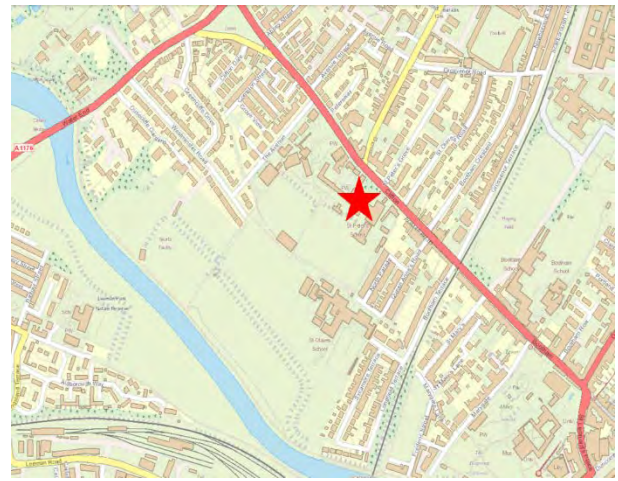
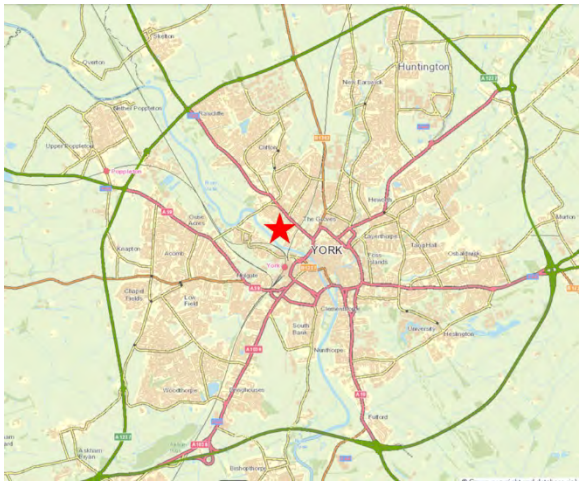
# 1 INTRODUCTION

## 1.1 The Proposal

The proposed master plan seeks to establish the development framework for the school over a 15-year period, 2021-2036. Considering the school's vision and aims to provide the best possible learning environment for its students. Including modern academic, sports, performance facilities, environment, energy efficiency, and considering transport provision to support the school's onward growth.

## 1.2 Site Location

St. Peter's School site is located off the A19 (Clifton) to the west of York City centre. Within the A1237 Ring Road in the west and North of the River Ouse.



## 1.3 The Campus

The whole school estate extends to approx. 19ha. However, the main school campus is 17.6ha being located to the West of York City centre and to the South of the A19. To the North the campus is served and bounded by the A19 a main arterial route into city via Clifton and Bootham, to the West and East boundaries the site is enclosed by development which is predominantly residential in nature. The Southern aspect of the site is open, being bounded by a newly improved widened and heightened clay flood barrier, flood walls and an area of wash land to the River Ouse. Part of the lower site is also subject to flooding as it forms a wash land area. Currently the wash land at the southernmost boundary and East and West of the new boat house is occupied by sacrificial practice sports pitches. Currently designated as educational use there will be no requirement to change this.

The current campus is physically separated into a North and South Campus by an existing PROW, running East-West between Queen Anne's Road to the east and the Avenue and Westminster Road to the West. The two respective parts of the Campus are connected across the PROW via a footbridge at the Queen Annes Road end of the PROW.

It should be noted therefore that the terms North and South Campus' referred to elsewhere in this document, refer to those parts of the campus which lay either South or North of the PROW.



Image showing existing Public Right of Way No.55/139/10

## 1.4 Master Planning Principles

We could say that the master planning process started back in 1844, and over the next 100 years or so, it evolved and as with all master plans it was replanned and re-evaluated.

The guiding principles for the current master planning process are a combination of the following:

- The school's strategic vision and aims.
- The establishment of hubs (Grouped facilities rather than standalone departments).
- Improved traffic management.
- Provision for enhanced Music, performing arts, sport, expansion of the STEM hub to form an inclusive STEAM hub and dining facilities.
- Improved connections within the site.
- Responding to the schools ongoing development needs and improved facilities master plan for a minimum 15-year period.

## 1.5 Master Plan Document

This document has been developed to provide the following:

- Site analysis, constraints, and opportunities.
- Basic landscape and physical appraisal.
- Proposed draft master plan.
- Brief indication of the design principles to be developed.



## 2 SITE ANALYSIS

### 2.1 Built Landscape and Physical Setting

By virtue of its inherent history St. Peters School provides education through a varied building medium. Consisting of some fine period listed buildings, through to newly built high-quality blocks such as the Pascal building completed in 2018 and the slightly later boat house.

#### North Campus

All buildings set within the north campus are coherent with one another and tell a visual story of development and growth.



St Peters School North Campus looking South.

#### South Campus



South campus formerly known as St. Olaves, with the Grade II listed former Queen Annes School to the left.



Within the south campus the grade II listed building Queen Anne's Girls Grammar School, dated 1908 (latterly known as St. Olave's), extended post war era with steel/concrete frame and prefabricated panels. Acquired by St. Peter's as a valuable asset to the estate and onward development of the school.

The site generally falls from North to South in a series of plateaus created through the onward development and cut and fill, to achieve satisfactory level drained sports pitches above the wash land area at the lower end of the site adjacent the River Ouse.



Campus view from the southwest along the River Ouse

It is clear the original school building along Clifton has stood isolated and in splendour, for many years. A position and context enjoyed to this day when approaching the school from either Clifton Green or Bootham. Helped by the abundance of mature trees, being set back from the road and resplendent sympathetic additions of the Chapel and current library. As the area around the site became subject to more suburban development, the school has retained its setting along Clifton. Through the acquisition of several land parcels and buildings, allowing the school to grow and has formed the context we see today.

The school's expansion had been sufficient in the past. As we see today the North and South parts of the campus are now at capacity in terms of land use. A more pressing issue and one that has been a significant factor in master planning for the future is the condition of some building stock which is now at end of useful life in quality and useability. Further land is not available to the school and replacement would be the most economical option to reach the schools aims and policies, in the future. However, this in turn requires we consider the decant spaces,





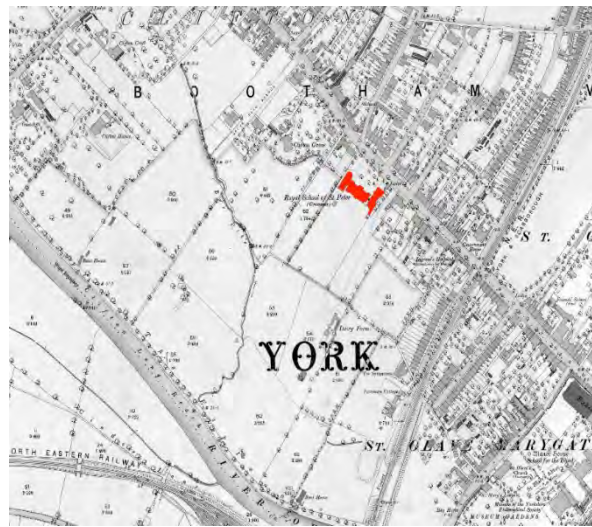
construction compounds and access. To ensure the school can continue to function with minimal disruption a point of paramount importance and non-negotiable for the school.

## 2.2 Urban Context

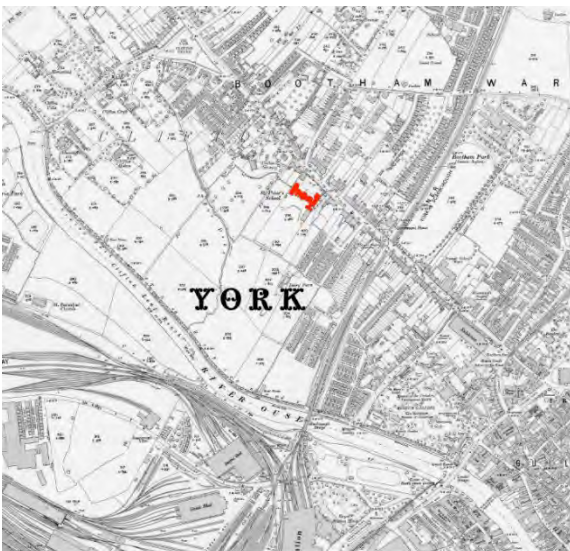
The present site has been occupied by St. Peter's School since 1844, although the site has been occupied in one form or another since the Roman period. Most of the surrounding urban area, that is to say the buildings outside the bar walls have developed since the 1850's. The original school building occupies the high ground above the earlier flood levels of the River Ouse to the South.



1852



1892



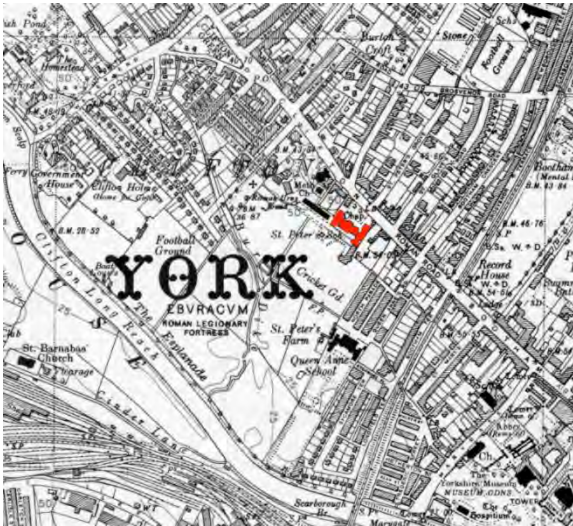
1909



1931

Victorian Development of the area around the campus started along Clifton and Bootham, by the turn of the 20<sup>th</sup> century development progresses to occupy the land to the West and East of the current Campus demise.





1952



2017

There is a good mix of property types from Victorian Villas and town houses to Edwardian Terraces, inter and post war suburban semis. The school itself had also developed during this period adding additional buildings and facilities, through disposals and acquisition the school's estate increased during the 20<sup>th</sup> and 21<sup>st</sup> centuries, to form the campus we see today.

Much of the school's massing is set to the North of the site with a smaller concentrated element to the Southeast, being the former Queen Anne's Girls Grammar School, acquired in 2001. Circulation, parking, service areas and playing fields occupy the remainder of the site, save the isolated swimming pool and more recent boathouse.



Current view of the school from the river, shows the improved flood defence work at the centre axis of the image. Former St. Olave's School just to the right of centre.



## 2.3 School Facilities on Campus

Existing facilities within the school campus encompass every type one would expect for a school of this size and type to function. As a boarding school there are additional facilities such as boarding houses, and pastoral facilities. However, currently some stock is now in need of upgrade or replacement. Changes in the curriculum and increase in pupil numbers will require some academic facilities to upgrade, increase in any case, with the gradual rise in pupil numbers. While other areas will require replacement refurbishment as part of an ongoing program of improvement to form facilities of an acceptable standard. Modern curriculum requirements also place an onus to plan ahead, improve and provide. More details can be found in the appendices.



Cricket square, north campus



First XV Rugby, north campus



Chilman Building, north campus



Pascal Building, north campus



Swimming Pool, north campus

## 2.4 Facilities Off Campus

The school currently finds that it needs to use offsite third-party facilities on a regular basis, which adds to its carbon footprint. Those offsite facilities generally being sport all weather pitches, squash courts, gyms for cardio and physio due to the somewhat stretched and undersized facilities on the school campus.

## 3 CONSTRAINTS & OPPORTUNITIES

An initial examination of the site sought to identify the constraints and opportunities which would govern the future development plan of the site in terms of its estate and meeting the future academic, sports, music, and pastoral needs of the school.

### 3.1 Identified Constraints

- 15% of the site is affected periodically by flooding of the EA designated washland.
- Site is divided by an existing public right of way (PROW 55/139/10).
- Listed Buildings and an area of the site within the conservation area.
- Impact on neighbouring residential properties.
- Poor vehicular access to southern campus.
- Relatively poor condition, outdated facility provision of some building stock.
- Implementing a plan of renewal will require repositioning some facilities, including a new sports hub. Retention of available land to decant parts of the school to temporary accommodation on campus and serve as construction compounds and haul roads. This will be better served to the South of the PROW, retaining the existing historic sports pitches to the north of the public right of way.
- York City Council revised Green Belt Boundary if adopted will adversely affect the school's ability to develop in the future.

### 3.2 Identified Opportunities

- Opportunity to provide better access to the south campus.
- Improvement of the existing sports facilities in terms of building stock and installation of all-weather pitches.
- Improvement of academic facilities, without detracting from the historic nature of the site.
- Enhance biodiversity of the open space boundaries.
- Reduction of the carbon footprint through reduced travel and BREEAM very good to excellent energy efficient building design and construction.
- Landscape opportunities.
- Much of the proposed new build will be a replacement of existing end of life building stock.
- Move the proposed green belt boundary in line with the current clearly defined physical edge of the flood defences. Confirmation of the green belt boundary along the flood defences will allow the school to develop north of the flood bank and provide a sustained program of evolution for the school campus over the next fifteen to twenty years.





South Campus buildings - image shows that upgrade will be cost prohibitive.



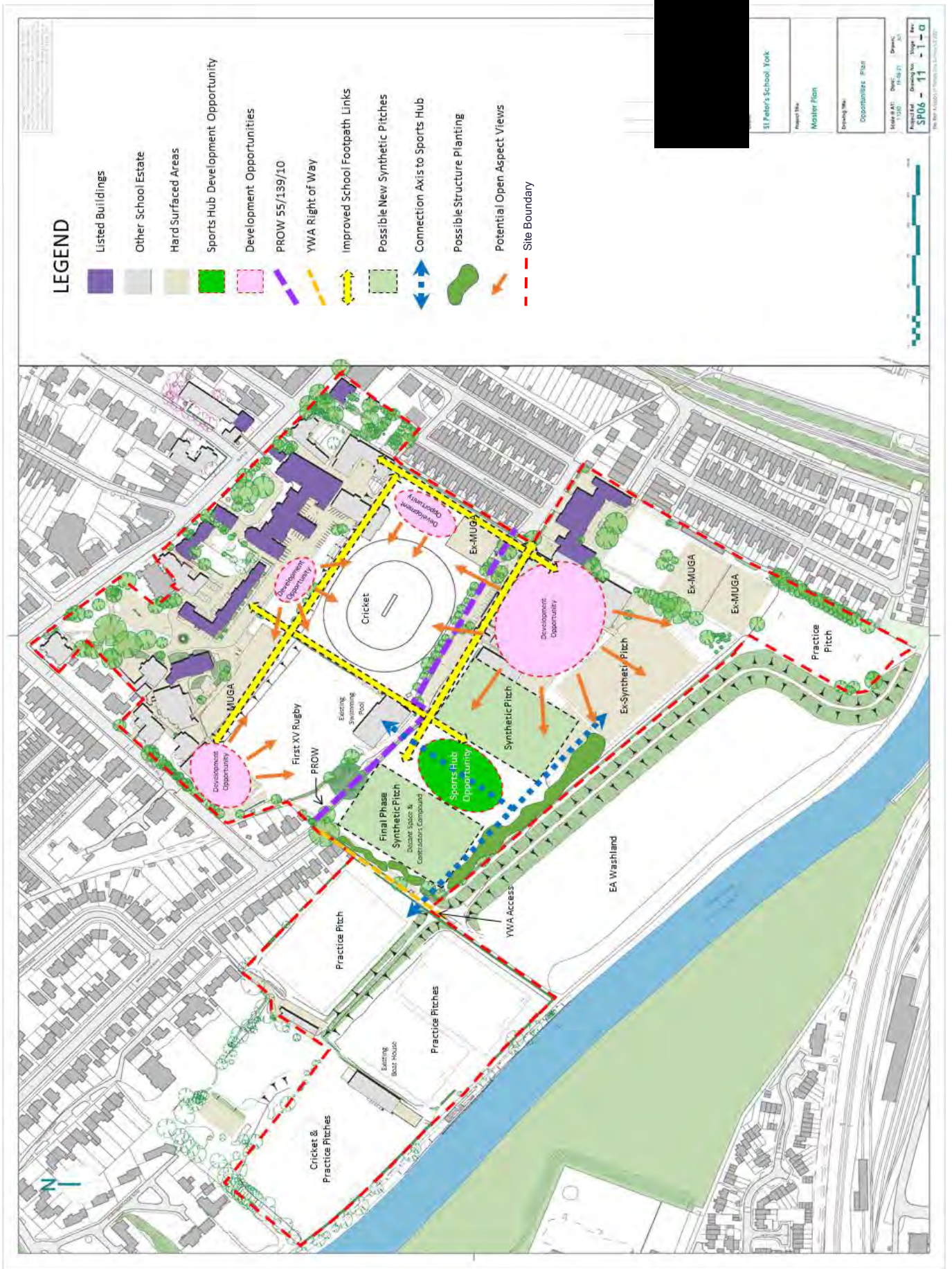
South Campus in the foreground, image taken before completion of enhanced flood defence works.





Constraints Plan - not to scale





Opportunities Plan - not to scale

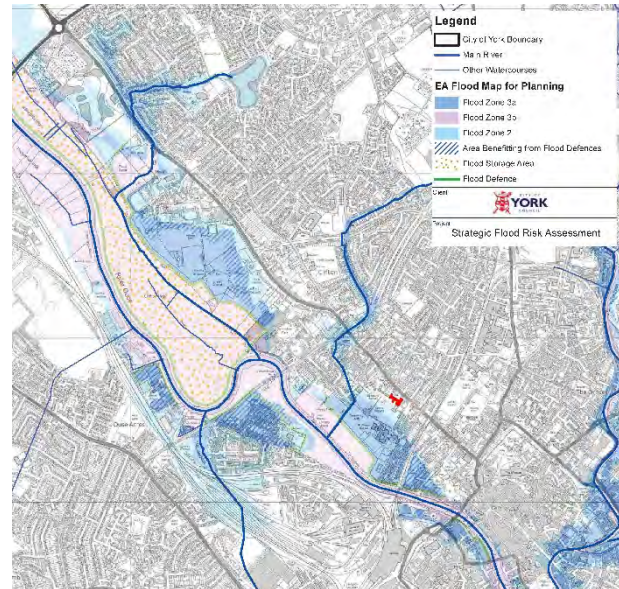


### 3.3 Future Capacity for Growth

Despite the historical and urban constraints, the campus still offers good capacity for growth through redevelopment and improvements brought about by a cohesive master plan to be implemented over a 15 to 20-year period.

#### Flood Risk

Recently enhanced flood defence work (due to complete 2021) has reduced the risk of serious flooding to most of the site except the two areas either side of the boathouse, designed to act as washlands for temporary flood storage. Currently those playing fields to the extreme south of the school's boundary. Despite the completion of the much-improved flood defences, the EA flood mapping still shows a large proportion of the school playing fields in the wash land area. This currently affects two sacrificial pitches to the West and East of the boat house. Prompting the school to make better use of the land immediately north of the flood defences for synthetic pitches.



EA Strategic Flood Risk Assessment.

### 3.4 Traffic

Traffic on site and in the surrounding streets is a significant concern to the school. Drop off and pick up times can result in increased congestion in the surrounding streets. Although peak traffic generally last around 30minutes twice a day. Having large numbers of cars passing through the site with the current road layout raises safety concerns.

Various initiatives to reduce the traffic have been implemented by the school, such as park and stride, cycle shelters and cycle training, car sharing initiatives and a park and ride initiative with Bootham School which was about to start pre- Covid. There would be no reason why such initiatives would not continue to be implemented into the school's future travel plan.

The school like many others has had to adapt to providing drop off zones and increased visitor parking. However, a further issue is the day to day servicing the site, by deliveries and coaches ferrying students to offsite facilities and activities, which impacts on the local community.

How people travel to and through the site is also key factor in the development plan. Improving traffic flow on site through careful design will in turn improve traffic congestion off



site. Development of facilities to enable better and safer use of more sustainable travel options for pupils and staff. For example, bus access, cycle ways and storage, as well as developing facilities to exploit park and stride and park and ride solutions will be part of the detailed strategy.



Looking North up Queen Annes Road with its restricted access, due to resident parking



Clifton (A19) looking East, can be congested in peak hour traffic. School on Right

### 3.5 Energy Efficiency

Current energy efficiency is well below par for several existing buildings. St Peter's School as custodians of a diverse estate for the current and future generations recognises the importance of considering the long-term impact of their decisions made today, particularly in relation to the future development of the site. It is the aim of St Peter's School to be good stewards of resources, to be more efficient with the resources required to run and develop the school, and to reduce the impact this will have on the planet.

It is therefore a key driver for the development of the campus to continue to improve energy efficiency and to move toward more sustainable energy sources. The lifetime environmental impact and costs of new buildings and the replacement or redevelopment of old building stock are part of the design and development strategy. Current energy efficiency levels are detailed in Appendix 7.1 showing current EPC's.



Poor quality CLASP procured previous LA stock in need of replacement has minimal architectural value in terms of fenestration and quality of build.

## 4 VISION & AIMS

St Peter's School vision is to be able to carry on doing what they do with great success, delivering outstanding academic excellence with an extensive and diverse range of well-resourced co-curricular activities. To have the flexibility on site for continued development of the school as a creative, sustainable campus. The following aims are based upon a need and expectation to deliver its vision.

### 4.1 Distinctive

The plan aims to create a distinctive development, one which continues the sense of place that has become synonymous with the history and setting of the school. The master plan reflects a continued evolution of the school campus to provide quality facilities, an intrinsic element for the delivery of a first-class education. As such the facilities that currently require significant enhancement are as follows:

#### **Music:**

St Peter's has a nationally recognised music department which produces outstanding music and musicians from limited facilities the heart of which is a converted town house. Practice and teaching rooms are few and instrumental lessons and practice can be heard taking place all over the school in various rooms and spaces which were not designed for this purpose. More recently, to accommodate the additional 80 individual music lessons a week required for the choristers who joined the school in 2020, temporary converted glamping pods were hurriedly installed as music teaching and practice rooms. The school requires dedicated purpose-built music teaching, practice, and ensemble rooms, as well as improved appropriately designed performance spaces more suitable for hosting music events.

#### **Performing Arts:**

School productions are of an extremely high standard and have a very dedicated team who work hard to achieve amazing results transforming the halls into spectacular theatre venues. However, these spaces are outdated and have limited capacity. A purpose-built performance space with a greater audience capacity, which could also overcome some of the other constraints mentioned above is required, plus additional rehearsal and studio space to meet the needs of the drama curriculum more adequately.



### Sport:

St Peter's Sport achieves national success at all levels and in a broad range of girls and boys sport at all age levels. Some facilities are however outdated with limited capacity. Due to the city centre nature of the site, the school has fewer sports pitches than most of its competitor schools. This is further limited due to two areas of sports pitches being located on the river side of the flood defences. The amount of time these are unavailable due to the EA mitigated designed flood wash being implemented, appears to be increasing putting further pressure on the remaining grass pitches.

The construction of a synthetic pitch in 2008 suitable for hockey and tennis brought significant improvement to the school's sport facilities. However, with the rapid increase in popularity and success in hockey the school is now transporting students to other synthetic pitches all-round the city for practice and for matches which is highly undesirable, a waste of time for staff and pupils in an already busy day and puts additional coaches on the road network of York. In winter, the lack of floodlights on the existing pitch means that they are not able to fully utilise the pitch and must travel to floodlit facilities instead. The installation of another synthetic pitch for Hockey, and installation of flood lights for both is essential.



Recently completed boat house

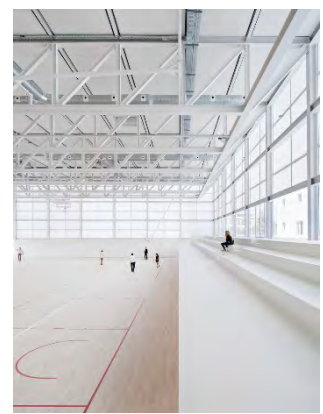
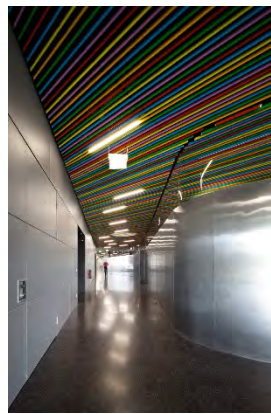
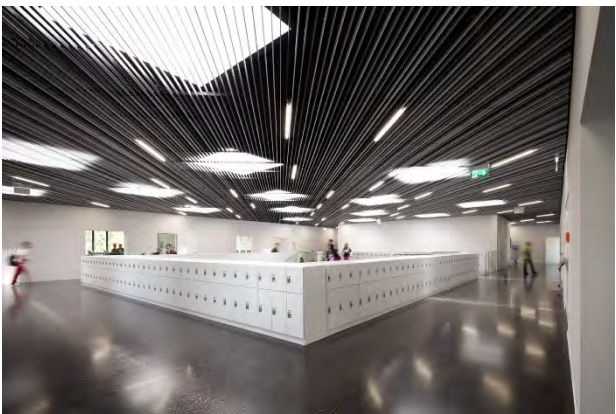
To have at least one of these as a covered surface by installing an "air dome" or other appropriately designed cover to enable play in all weathers would be ideal. To reduce pressure on the grass surfaces further the installation of more synthetic pitches for football and rugby are also required. Thus, increasing the number of plays per week, and during times of inclement weather offering an on-site alternative to the sacrificial practice pitches in the washland area of the campus.



Existing sports hall

The current sports halls now reflect out of date standards and do not comply with the latest Sport England design specifications. Other facilities, such as the strength and conditioning suite and weights room although having the latest equipment are too small to cater for the upward demand. Additional space for fitness equipment, including specialist equipment for sports such as rowing are much needed additions to the sports facilities.

Further facilities would include studio space for exercise and dance classes. Multiple changing and showering facilities. Introduction of onsite squash courts, medical and physio rooms. Dedicated sports classrooms and offices should all form part of a central sports hub.



Aspirations to create a multifunctional sports hub, embracing updated facilities and flexibility for future use.

The improvement of sports facilities and the development of a “sports hub” designed to provide much needed improved facilities for the school as well as more accessible and a wider range of facilities for the community is one of the central aims of the site development plan.

## 4.2 Permeable and Connected

The masterplan is developed around an existing hierarchy and series of open spaces linked by existing pedestrian footpaths, cycle ways and vehicular routes within the safe guarded areas of the campus. In terms of external connections, the plan relies upon the existing vehicle and pedestrian accesses including the continued provision of the PROW detailed elsewhere.





Looking west on the existing PROW



Existing PROW looking west showing school pedestrian bridge crossing



Gated path adjoining PROW to the east



Footpath linking Queens Building with swimming pool



Gated access to south campus from PROW

Reviewing emergency access to the south and north campus areas, and also reviewing additional student connections between the north and south campuses.

### 4.3 Attractive

Attractive buildings and landscape that will enhance the site. Taking account of external views into the site and exploiting the open spaces defining and creating biodiversity opportunities.

### 4.4 Sustainable Development

To improve energy efficiency, through the provision of best practice design to achieve sustainable material usage, high levels of insulation, power generation, to achieve BREEAM 'excellent' or as a minimum 'very good'.

### 4.5 Safe

Student and staff safety will remain an important part of the master plan design, taking every opportunity to improve safeguarding policy by designing out possible issues at the outset.

The covid pandemic, has required some creative thinking in order to implement measures to safeguard all, during the unprecedented times. Moving forward there is no reason why the future planning for the school would not take such measures into account. Ensuring that should there be a recurrence or similar situation the school and campus will be prepared to meet any new restrictions. We already know that an important element in the suppression of cross contamination comes from being able to provide adequate social distancing. This in turn puts pressure upon the educational environment, which requires flexibility in the use of space both internally and externally and as such, the school aims to be fully prepared through the provision of the development master plan.





# 5 MASTER PLAN GUIDING PRINCIPLES

## 5.1 Master Plan Concept

The master plan aims to provide a considered overall plan for the site, developing a concept layout developed in conjunction with existing facilities and building stock of St Peter's School. The intention is to provide key design principles and the basic conceptual layout upon which detailed planning applications can be based.

The overarching concept is for the development of a phased hub style development within a connected hierarchy of links associated with the existing open sports space, retained academic buildings. A core element is the provision of a workable methodology to carry out the master plan proposals in a way that will not interrupt the smooth day to day running of the school.

The relationship of the school campus to the A19 to the North, will remain essentially the same. Long term improvements to free-flowing vehicular movements will come from improved traffic management and education on sustainable transport options for staff and pupils.

## 5.2 Key Features

During the master plan process several alternative layouts have been considered. However, the key site features remain constant and provide the basis for any design these are:

1. Existing accesses to the site.
2. Investigating improved access to the site.
3. Protected trees.
4. Plateaued site topography.
5. Existing development to the North, East and West of the site.
6. River Ouse, Wash Lands and Flood Barrier to the South.
7. Eight Grade II Listed Buildings and the defined Conservation Area.
8. The existing Public Right of Way through the site.
9. Retained right of way to existing pumping station.
10. Area for temporary decant and contractor compound/access being on the land immediately west of south campus and north of the flood barrier. As used recently by the environment agency.

## 5.3 Design Principles

The design principles have been established using the existing landscape and sports field capacity, existing development, and site topography. The master plan seeks to mitigate the anticipated minimal impact of the proposed redevelopment on the site, its landscape and

openness to the South while at the same time creating high quality academic facilities with excellent amenity.

The design principles therefore include the following:

- Development of a range of high-quality campus buildings, including music and performing arts hub, sports hub, enhanced STEAM hub, replacement academic buildings.
- Creation of new all-weather synthetic pitches and improvement of existing sports pitches and landscape buffers.
- Provision of improved ancillary facilities integral to the school including improved dining and medical facilities.
- Review access to the south campus below the PROW, including provision of much needed clear emergency access.
- Development of a landscape and all year-round sports pitch strategy creating a suitable sports hub, while maintaining the current open aspect enjoyed from the south bank of the River Ouse.
- Review pedestrian permeability between North and south Campus' currently served by a single footbridge over the PROW.
- Working with the local community to provide beneficial shared facilities.
- Creation of a safe environment ensuring that open space and footpath links within campus are overlooked and better connected.
- Address concerns brought about by the covid pandemic, that will ensure compliance with measures and provide a safe environment for all in the future.

## 5.4 Proposed Master plan

1. The proposed master plan provides three distinct development blocks referred to as hubs within the existing campus boundary. Which will require a phased development approach over a 15-20 year period, incorporating a system of decant, demolition and replacement. Particularly to the southeast cluster and the northwest corner of the north campus.
2. Retaining green corridors as arterial pedestrian links within the campus, connecting the 3 clusters of development. With a dedicated link connecting the north and south campuses to supplement the existing bridge link.
3. The current master plan is essentially a redevelopment of 2 identified key areas and an extension to an existing group of buildings, to form a new STEAM hub. The proposal has been informed by the existing constraints of the site and the low quality of some of the existing facilities making them ripe for redevelopment and expansion.
4. As the school will continue to operate throughout development elements, space is allocated for decant of departments to temporary facilities, contractors' compound, haul roads etc. This will require the use of the site immediately north of the flood barrier.



5. The topography and makeup of the site has largely dictated the location of the blocks, however in the case of the proposed new dining facility this is proposed to utilise a part of the site which will in effect be replaced by a better facility within the south campus sports hub. It will also facilitate easier access for deliveries and complement the existing smaller Clifton Dining facility to create a 'Dining & Hospitality Hub'. This new facility overcomes a current issue over capacity for the existing dining facility to the east of the north campus. Freeing up an area of the existing central core to be redeveloped into academic use.
6. The new dining hub will form a useful, functional multipurpose space for performances, exams, provision of refreshments during first XV rugby, cricket complementing the much-needed larger dining facility.



Aspirational images for a new dining hub

7. Consolidating existing STEM facilities located in and around the 2018 Pascal building, with a new purpose-built arts and technology department. With its modern take on a north light roof for clean light in the studios. Its multiple pitched roofs also reflect adjacent residential massing to the east boundary. Predominantly single storey the varied roof line will break up the massing and create visual interest rather than obtrusive impact of the surroundings.



Aspiration images for new art and technology extension as part of a 'STEAM' Hub Consolidation

8. Music, Performing Arts and Sports hubs will share the southern campus and involve the redevelopment of the Former Queen Anne's Grammar School cluster, except that part

which is listed. The synthetic sport pitches will remain and improve as part of the proposed sports hub. Together the proposed elements form a major undertaking for the site, which will require decants, temporary accommodation and a sizeable contractor's compound. All of which will need to be accommodated within the south campus and in particular the areas shown as '7' on the on the existing sports facilities plan in the appendices.



Proposed purpose built performing arts and music hub aspirations.

## 5.5 Building Typology

The school has a good track record in providing new building stock which addresses the earlier fenestrations in a modern vernacular way. It is envisaged that the proposed campus buildings will carry on this tradition. Employing new technologies to reflect the forward-thinking school ethos. Creating landmark opportunities within the school site that enhance the long-distance views and enjoyment of passers-by as well as the students and staff who will undoubtedly utilise them to their fullest. As recently demonstrated by the 2018 completion of the Pascal Building. There is a new visual language shared between the 3 school entrances, swimming pool and pascal building, which the new proposals will continue to draw upon.



## 5.6 Landscape & Greenspaces

The increased height of the flood defences now create a defined physical and visual buffer between the school and riverside, where it had previously been more open below the south cluster of buildings. The area of the school shown as 4,5 & 6 on drawing SP06-001 remain divided by the heightened flood barrier. In terms of views from the riverside, this area is well landscaped with trees and hedges atop an incline from riverside path to sports playing fields. It is important to note therefore that the school is far less prominent today than it would have been in the past.



Master plan proposals further add to the landscape buffer with additional structure planting, making best use of the land immediately north of the flood barrier, providing modern sports facilities and improved sports pitches. While the area in the southwest of the campus will remain as sports practice pitches, with those either side of the boathouse being sacrificial at times when that area is utilised as washland.

As part of the improved facilities the school intends to install new synthetic pitches and improve the existing hockey pitch with an all-weather construction. The new structure planting and juxta position of new sports hub buildings will reduce any impact on neighbouring residential properties that the synthetic pitches may bring through regular use.

## **5.7 Biodiverse - Sustainable Development**

The hub type development has been designed with sustainable features at the core of the design. The site itself is accessible by modes of transport other than the car with good public transport links and cycle and core paths routes. In addition, the proposed scheme will include enhanced opportunities for biodiversity within its landscape fabric. Further, each element of the newly developed campus will employ sustainable methods of construction and materials.

There are opportunities to reinforce the boundaries with structure planting, which in turn will provide biodiverse habitats and structure to the site external boundaries and internal divisional boundaries too.

## 6 SUMMARY

The school functions efficiently despite its various constraints. There is, however, a pressing need to address current building inadequacies, space constraints and access over the coming years. To this end a high-level 15-year master plan has been devised.

Development potential for the existing campus is limited by size of the site. Therefore, master planning is always going to be subject to array of existing constraints. For the master plan to proceed within a legitimate plan period, and within a safe development area, it is essential that no further constraints are placed upon the site. City of York Council proposals to amend the green belt boundary will have a significant stifling effect on the school's future and its ability to contribute not only to education but also its contribution to the local economy.

The master plan deals with the historic elements, flood risk and connections within the campus. With good planning and 'room to move', these constraints can be overcome if the school is not further constrained in its approach to improve and redevelop existing facilities and estate.

The conclusion is clear, the ability to make use of the entire site north of the flood barrier is paramount to the future development of the hubs, by allowing decant space, and expansion of the sports, music, performing arts facilities along with new improved all weather pitches.



## **7 APPENDICES**

- 7.1 SP06-001 Existing Sports Facilities Plan**
- 7.2 SP06-002 Listed Buildings & Conservation Area Plan**
- 7.3 SP06-003 Energy Efficiency (EPC's) Estate Plan**
- 7.4 SP06-004 Building Quality Index**
- 7.5 SP06-005 Proposed Draft Master Plan**
- 7.6 SP06-006 Proposed Greenbelt Boundary**

**From:** [REDACTED]  
**Sent:** 21 July 2021 13:47  
**To:** localplan@york.gov.uk  
**Cc:** [REDACTED]  
**Subject:** Re: City of York Local Plan Proposed Modifications and Evidence Base Consultation (2021)  
**Attachments:** City of York Local Plan Proposed Modifications and Evidence Base Consultation - Response by Geoff Beacon.docx; Cars to drive or a planet to live in\_ A numerical assessment. \_ Ideas from Brussels and York \_ Brussels Blog.pdf; YorkLocalPlan\_2019 \_Climate18.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

**Response by Geoff Beacon to ...**  
**City of York Local Plan Proposed Modifications and Evidence Base Consultation (2021)**

**21<sup>st</sup> July 2021.**

Thank you for the invitation to respond to the proposed modifications to the City of York Local Plan. I am not responding on the council's form as "This form is currently unavailable" on the Council's website.

The proposed modifications concern the Green Belt. These modifications specify in some detail proposed boundaries of the Green Belt, giving the proposed green belt a lock on the pattern of development in the York Local Plan, making changes very difficult for the next twenty years or more.

Here I argue that the world is facing a climate change catastrophe, which demands radical action to change the way life on Earth is lived. The current version of the York Local Plan has been developed without full knowledge of the scale of this problem and revisions will be necessary. The Green Belt should not constrain necessary changes to the plan in the near future. This means York should not define a green belt.

## **Climate Change**

Today, 21<sup>st</sup> July 2021, there are further reports of unprecedented flooding in a large part of China, following weeks of reports of worldwide wildfires, floods and heat deaths in humans and billions for wildlife.



The US Special Envoy for Climate, John Kerry is visiting the UK ahead of the COP26 meeting in Glasgow pointing out the dangers of climate change. Yesterday at a meeting organised by Chatham House, he said

"The irony should not be lost on us that it is young people around the world who are calling on adults to behave like adults, and exercise their basic responsibilities.

"They know the world is not responding fast enough to an existential threat that they didn't create, but for which they risk bearing the ultimate burden - uninhabitable communities on an increasingly unliveable planet in their lifetimes."

A few days ago, former Met Office Chief scientist Prof Dame Julia Slingo told BBC News: "We should be alarmed because the IPCC [climate] models are just not good enough." This was reported in an article by BBC's Roger Harrabin "[Climate change: Science failed to predict flood and heat intensity](#)".

### **The remaining the carbon budget**

The remaining "carbon budget" specifies the maximum amount of CO<sub>2</sub> that may be emitted to stabilise warming at a particular level – such as the [Paris Agreement's](#) 1.5C target.

[Carbon Brief, 19 January 2021](#)

Julia Slingo's warning means that the remaining carbon budgets calculated in the IPCC's special report, [Global Warming of 1.5 °C](#), are likely to be over estimates.

**In March 2019, York City Council passed motions declaring a climate emergency and commissioned studies on how to proceed. One study was by Professor Gouldson and others from Leeds University's School of Earth and Environment. Based on the IPCC's special report, this study concluded that York's total remaining carbon budget was just over 10 million tonnes CO<sub>2</sub>e from 2020. That amounts to 50 tonnes CO<sub>2</sub>e per York citizen. Recent developments show that this is likely to be an overestimate.**

### **Current emissions of greenhouse gases**

Global emissions of greenhouse gases are about 50 billion tonnes CO<sub>2</sub>e per year and still rising. This is 6.5 tonnes CO<sub>2</sub>e per person worldwide.

The carbon emissions associated with UK consumption emissions are published each year but a few years in arrears. Figures for 2018, give average consumption emissions per UK citizen as 10.49 CO<sub>2</sub>e.

A study funded by the Joseph Rowntree Foundation in 2015 found that in the new ‘sustainable’ development at Derwenthorpe residents had “a slightly higher mean [yearly] footprint per person than other York residents (14.52 compared with York’s 14.30).”

Professor Gouldson’s study gave current yearly emissions for York as 888,000 tonnes CO<sub>2</sub>e, which amounts to 4.23 tonnes CO<sub>2</sub>e per citizen – a surprisingly low figure – but the study pointed out that this would exhaust York’s remaining carbon budget in less than 12 years.

The difference between Professor Gouldson’s figures and others is partly because his study excluded emissions from longer distance travel (especially aviation) and the carbon emissions associated with imported goods. These are part of consumption emissions - the emissions caused by citizens’ individual consumption. York’s declaration of a climate emergency required that consumption emissions should be counted.

The full consumption-based figures suggest that the average resident of York will exceed a personal remaining carbon budget in less than 5 years. (Note: For new developments, the emissions from constructing housing and infrastructure should be added. This could amount to 10s of tonnes of CO<sub>2</sub>e per resident.)

### **The York Local Plan**

Work on the York Local Plan was started before York’s declaration of a climate emergency. The recent realisation of the seriousness of the situation and necessary changes to our lifestyles is not sufficiently reflected in the plan.

As atmospheric concentrations of greenhouse gases have continued to rise, despite the economic slowdown caused by the covid pandemic, the assumptions that life can continue (more-or-less) as business-as-usual must be abandoned. This means the current version of the York Local Plan cannot be the plan for the next 20-or-so years.

Notably, the plan contravenes York’s declaration of a climate emergency and as noted in a previous submission the National Planning Policy Framework. This submission is [The York Local Plan: Climate Change](#): A pdf copy is attached.

### **The Green Belt Lock**

A tightly defined Green Belt will act as lock to preserve the essence of the current Local Plan when the plan must rapidly change at this time of extreme climate emergency. The Green Belt proposals should be rejected – and the current version of the Local Plan withdrawn.

### **Appendix 1: Widespread personal vehicle ownership.**

The current York Local Plan (locked in by a tight Green Belt) plans for increased used of cars as shown in York’s [Local Plan Modelling Review](#)

However, the House of Commons S&T Committee has said :

“In the long-term, widespread personal vehicle ownership does not appear to be compatible with significant decarbonisation. “



This will not be altered by the introduction of electric cars. Although these can have carbon emissions, which are less than diesel and petrol cars, their embodied greenhouse gas emissions alone are a large proportion of a personal remaining carbon budget.

Greater use of private cars is not compatible with York's declaration of a climate emergency. A PDF of "Cars to drive or a planet to live in? A numerical assessment" is appended.

----- Original message -----

From: "[localplan@york.gov.uk](mailto:localplan@york.gov.uk)" <[localplan@york.gov.uk](mailto:localplan@york.gov.uk)>

Cc: "[localplan@york.gov.uk](mailto:localplan@york.gov.uk)" <[localplan@york.gov.uk](mailto:localplan@york.gov.uk)>

Subject: City of York Local Plan Proposed Modifications and Evidence Base Consultation (2021)

Date: Tuesday, May 25, 2021 5:22 PM

Dear Sir/Madam,

## **City of York Local Plan Proposed Modifications and Evidence Base Consultation (2021)**

### **in compliance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012**

I am writing to inform you about the opportunity to comment on the Proposed Modifications (2021) to the City of York Local Plan and supporting evidence base. The emerging Local Plan aims to support the city's economic growth, provide much needed housing and help shape future development over the next 15-years and beyond. It balances the need for housing and employment growth with protecting York's unique natural and built environment.

The City of York Local Plan is currently in the process of Examination by Independent Planning Inspectors following submission of the plan to the Secretary of State for Housing, Communities and Local Government on 25 May 2018. Following the phase 1 hearing sessions held in December 2019 we are now publishing a series of proposed modifications to the City of York Local Plan and supporting evidence base.

This consultation gives York residents, businesses and other interested groups the opportunity to comment on the additional evidence and proposed modifications to the city's Local Plan prior to further hearing sessions as part of the Examination. The Planning Inspectors undertaking the Examination have asked for the consultation as they consider the proposed modifications to be fundamental to what they are examining - the soundness and legal compliance of the plan.

The consultation period for the proposed modifications starts on **Tuesday 25 May 2021 for a period of 6 weeks**. All consultation documents will be live on the Council's website ([www.york.gov.uk/LocalPlanConsultation](http://www.york.gov.uk/LocalPlanConsultation)). Printed copies of the consultation documents will be available at West Offices, if open in line with the Government's Coronavirus restrictions, by appointment only. Documents are also available to view electronically via Libraries, if open. Members of the library can book computer sessions up to a week in advance. Please see the [Statement of Representation Procedure](#), which accompanies this letter for more information.

Representations must be received by **midnight on Wednesday 7 July 2021** and should be made on a response form. You can complete an online response form via [www.york.gov.uk/form/LocalPlanConsultation](http://www.york.gov.uk/form/LocalPlanConsultation). Alternative format response forms are available by request.

Any representations received will be considered alongside the Local Plan Publication draft and the proposed modifications through the Examination in Public. The purpose of the Examination is to

consider whether the Local Plan complies with relevant legal requirements for producing Local Plans, including the Duty to Cooperate, and meets the national tests of 'soundness' for Local Plans (see below). Therefore, representations submitted at this stage must only be made on these grounds and, where relevant, be supported with evidence to demonstrate why these tests have not been met.

**Legal Compliance**

To be legally compliant the plan has to be prepared in accordance with the Duty to Cooperate and legal and procedural requirements, including the 2011 Localism Act and Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

**Soundness**

Soundness is explained in paragraph 182 of the National Planning Policy Framework (NPPF). The Inspector conducting the Examination in Public has to be satisfied that the Local Plan is 'sound' – namely that it is:

- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework (NPPF).

To help you respond, we have included Guidance Notes as part of the response form. We recommend that you read this note fully before responding. For more information please also see our [Statement of Representation Procedure](#), which includes information regarding our privacy policy.

At this stage, unless you indicate you wish to appear at the Examination to make a representation you will not have the right to do so. Any written representations made will be considered by the independent Planning Inspectors.

All of the consultation and further evidence base documents published at previous rounds of consultation are also available on the Council's website at [www.york.gov.uk/localplan](http://www.york.gov.uk/localplan).

If you require any further information on the consultation please contact Forward Planning at [localplan@york.gov.uk](mailto:localplan@york.gov.uk) or on (01904) 552255.

We look forward to receiving your comments.

Yours faithfully

[Redacted signature]

[Redacted signature]

\*\*\*\*\*

Help protect the environment! - please don't print this email unless you really need to.

\*\*\*\*\*

This communication is from City of York Council.



The information contained within, and in any attachment(s), is confidential and legally privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s), please note that any form of distribution, copying or use of this communication, or the information within, is strictly prohibited and may be unlawful. Equally, you must not disclose all, or part, of its contents to any other person.

If you have received this communication in error, please return it immediately to the sender, then delete and destroy any copies of it.

City of York Council disclaims any liability for action taken in reliance on the content of this communication.

City of York Council respects your privacy. For more information on how we use your personal data, please visit <https://www.york.gov.uk/privacy>

--

[Redacted signature block]

**Response by Geoff Beacon to ...**

**City of York Local Plan Proposed Modifications and  
Evidence Base Consultation (2021)**

**21<sup>st</sup> July 2021.**

Thank you for the invitation to respond to the proposed modifications to the City of York Local Plan. I am not responding on the council's form as "This form is currently unavailable" on the Council's website.

The proposed modifications concern the Green Belt. These modifications specify in some detail proposed boundaries of the Green Belt, giving the proposed green belt a lock on the pattern of development in the York Local Plan, making changes very difficult for the next twenty years or more.

Here I argue that the world is facing a climate change catastrophe, which demands radical action to change the way life on Earth is lived. The current version of the York Local Plan has been developed without full knowledge of the scale of this problem and revisions will be necessary. The Green Belt should not constrain necessary changes to the plan in the near future. This means York should not define a green belt.

### **Climate Change**

Today, 21<sup>st</sup> July 2021, there are further reports of unprecedented flooding in a large part of China, following weeks of reports of worldwide wildfires, floods and heat deaths in humans and billions for wildlife.

The US Special Envoy for Climate, John Kerry is visiting the UK ahead of the COP26 meeting in Glasgow pointing out the dangers of climate change. Yesterday at a meeting organised by Chatham House, he said

"The irony should not be lost on us that it is young people around the world who are calling on adults to behave like adults, and exercise their basic responsibilities.



"They know the world is not responding fast enough to an existential threat that they didn't create, but for which they risk bearing the ultimate burden - uninhabitable communities on an increasingly unliveable planet in their lifetimes."

A few days ago, former Met Office Chief scientist Prof Dame Julia Slingo told BBC News: "We should be alarmed because the IPCC [climate] models are just not good enough." This was reported in an article by BBC's Roger Harrabin "[Climate change: Science failed to predict flood and heat intensity](#)".

### **The remaining the carbon budget**

The remaining "carbon budget" specifies the maximum amount of CO<sub>2</sub> that may be emitted to stabilise warming at a particular level – such as the [Paris Agreement](#)'s 1.5C target.

[Carbon Brief, 19 January 2021](#)

Julia Slingo's warning means that the remaining carbon budgets calculated in the IPCC's special report, [Global Warming of 1.5 °C](#), are likely to be over estimates.

In March 2019, York City Council passed motions declaring a climate emergency and commissioned studies on how to proceed. One study was by Professor Gouldson and others from Leeds University's School of Earth and Environment. Based on the IPCC's special report, this study concluded that York's total remaining carbon budget was just over 10 million tonnes CO<sub>2</sub>e from 2020. That amounts to 50 tonnes CO<sub>2</sub>e per York citizen. Recent developments show that this is likely to be an overestimate.

### **Current emissions of greenhouse gases**

Global emissions of greenhouse gases are about 50 billion tonnes CO<sub>2</sub>e per year and still rising. This is 6.5 tonnes CO<sub>2</sub>e per person worldwide.

The carbon emissions associated with UK consumption emissions are published each year but a few years in arrears. Figures for 2018, give average consumption emissions per UK citizen as 10.49 CO<sub>2</sub>e.

A study funded by the Joseph Rowntree Foundation in 2015 found that in the new 'sustainable' development at Derwenthorpe residents had "a slightly higher mean [yearly] footprint per person than other York residents (14.52 compared with York's 14.30)."

Professor Gouldson's study gave current yearly emissions for York as 888,000 tonnes CO<sub>2</sub>e, which amounts to 4.23 tonnes CO<sub>2</sub>e per citizen – a surprisingly low figure – but the study pointed out that this would exhaust York's remaining carbon budget in less than 12 years.

The difference between Professor Goulson's figures and others is partly because his study excluded emissions from longer distance travel (especially aviation) and the carbon emissions associated with imported goods. These are part of consumption emissions - the emissions caused by citizens' individual consumption. York's declaration of a climate emergency required that consumption emissions should be counted.

The full consumption-based figures suggest that the average resident of York will exceed a personal remaining carbon budget in less than 5 years. (Note: For new developments, the emissions from constructing housing and infrastructure should be added. This could amount to 10s of tonnes of CO<sub>2</sub>e per resident.)

### **The York Local Plan**

Work on the York Local Plan was started before York's declaration of a climate emergency. The recent realisation of the seriousness of the situation and necessary changes to our lifestyles is not sufficiently reflected in the plan.

As atmospheric concentrations of greenhouse gases have continued to rise, despite the economic slowdown caused by the covid pandemic, the assumptions that life can continue (more-or-less) as business-as-usual must be abandoned. This means the current version of the York Local Plan cannot be the plan for the next 20-or-so years.

Notably, the plan contravenes York's declaration of a climate emergency and as noted in a previous submission the National Planning Policy Framework. This submission is [The York Local Plan: Climate Change](#): A pdf copy is attached.



## **The Green Belt Lock**

A tightly defined Green Belt will act as lock to preserve the essence of the current Local Plan when the plan must rapidly change at this time of extreme climate emergency. The Green Belt proposals should be rejected – and the current version of the Local Plan withdrawn.

### **Appendix 1: Widespread personal vehicle ownership.**

The current York Local Plan (locked in by a tight Green Belt) plans for increased used of cars as shown in York's [Local Plan Modelling Review](#)

However, the House of Commons S&T Committee has said :

“In the long-term, widespread personal vehicle ownership does not appear to be compatible with significant decarbonisation. “

This will not be altered by the introduction of electric cars. Although these can have carbon emissions, which are less than diesel and petrol cars, their embodied greenhouse gas emissions alone are a large proportion of a personal remaining carbon budget.

Greater use of private cars is not compatible with York's declaration of a climate emergency. A PDF of “Cars to drive or a planet to live in? A numerical assessment” is appended.



## Cars to drive or a planet to live in? A numerical assessment.

posted by Geoff on 20th Apr 2020

A numerical assessment – Cars to drive or a planet to live in?



The House of Commons Science and Technology Committee [reported](#):

**In the long-term, widespread personal vehicle ownership does not appear to be compatible with significant decarbonisation.**

Was the committee correct?

A crude test is to compare personal remaining carbon budgets with the emissions from personal vehicles, aka cars.

1

### The fair personal remaining carbon budget

The remaining carbon budget how much CO<sub>2</sub> can be released into the atmosphere to limit global warming to a given temperature.

[Tim Jackson has estimated](#) the UK's fair share of the remaining carbon budget. For a 1.5°C rise (with a 66% chance of success) the UK's share is 2.5 billion tonnes CO<sub>2</sub>. With a UK population of 66 million, this amounts to a "fair personal remaining carbon budget" of 38 tonnes CO<sub>2</sub>.

[Rogelj et al. have estimated](#) that to keep the Earth's temperature rise to a maximum of 1.5°C (with a 66% chance of success) the remaining carbon budget is 320 billion tonnes of CO<sub>2</sub>. With a global population of 7.8 billion, that amounts to just over 40 tonnes CO<sub>2</sub> each.

These estimates are for CO<sub>2</sub> only: They do not include the effects of other greenhouse gases such as methane and nitrous oxide. To account for the effect of these other gases a composite measure CO<sub>2</sub> equivalent (CO<sub>2</sub>e) is often used. There are various estimates of the relationship between CO<sub>2</sub> and CO<sub>2</sub>e. As a



rule-of-thumb, it will be assumed here that for emissions of each tonne CO<sub>2</sub> will translate to 1.25 tonnes of CO<sub>2</sub>e, an increase of 25%. (See Appendix CO<sub>2</sub>e)

Measurement of the emissions from specific activities (e.g. buying flowers flown from Nairobi or driving a car from London to Leeds) are usually measured in CO<sub>2</sub>e.

Using the estimates of Jackson and Rogelj et al., a guide for a fair personal remaining carbon budget is here assumed to be 50 tonnes CO<sub>2</sub>e – from the start of 2019.

2

## Households with cars have large carbon footprints

The Joseph Rowntree Foundation commissioned researchers at the University of York to [look at the new development at Derwenthorpe, York](#), using their REAP Petite software. Derwenthorpe was meant to be a sustainable development with a low carbon footprint but the results indicated that it achieved a footprint of 14.52 tonnes CO<sub>2</sub>e per resident per year. (Note: That is per resident not per household.)

World average emissions of CO<sub>2</sub>e are now about [7 tonnes CO<sub>2</sub>e per person per year](#). If this rate of emissions were maintained, the personal fair remaining carbon budget would be reached in seven years. If emissions steadily declined to zero over 15 years (i.e. By 2035) this budget limit would also be reached.

Derwenthorpe residents would reach the budgetary limit in less than 3.5 years: They could stretch that to 4 years by cutting their emissions by an unlikely 15% a year.

The emissions by Derwenthorpe residents were reduced due to the central wood chip burner that provides their heating, but their carbon footprint for travel was estimated at 45% higher than York's average. Car use is the important part of this : "Despite only one car space per household, few households had reduced their car use substantially"

The aim of the developers was to reduce car dependency in Derwenthorpe but not to reduce the level of car ownership. They aimed to promote alternative transport modes by a choice-based approach so residents could 'decide for themselves to use their car less'. Note that of the sample of 40 residents measured at Derwenthorpe, the lowest carbon footprint was in the household without a car.

Research by the University of Leeds, [Carbon reduction and travel behaviour](#), has shown choice-based approaches to be of limited value :

We have suggested that in this English and Scottish case study decision-makers accept the argument that choice-based approaches will lack effectiveness in reducing carbon, and that substantial change requires changing the conditions and circumstance which shape possible behaviours.

This confirms the idea that giving residents the option of owning a car but trying to promote alternative transport methods does not work well. The conclusion must be that residential areas should be car-free to achieve significant decarbonisation, in line with the conclusion of the House of Commons Science and Technology Committee, mentioned above.

3

## Categories of cars

The two relevant categories of cars are those powered by Internal Combustion Engines (ICE cars) and Battery Electric Vehicles (BEV cars). The consensus is that BEV cars have higher embodied carbon, due to the manufacture of the batteries, but cause lower emissions in use. However, the in-use emissions of BEVs are dependent on the carbon intensity of the electricity used to charge the batteries. This varies for different regions and countries.

There are many estimates of the carbon footprints of these categories. These footprints have two main components: the emissions from manufacture (called the embodied carbon in the car) and the emissions from driving.

4

## Methods of estimated embodied carbon

There is a marked difference between two methods of estimation for embodied carbon: bottom-up (LCA) estimates and top-down (IO table) estimates. Bottom-up estimates look at the carbon emissions in the materials used to manufacture cars, plus the emissions estimated for the energy used in the assembly into the final product.

As Mike Berners-Lee explains in "How bad are Bananas", top-down methods start by looking at the whole economy from a height. It uses macroeconomic modelling to understand the way in which the activities of one industry trigger activities and emissions in every other industry.

Top down methods are theoretically more complete but are harder to use. They give higher estimates of embodied carbon than bottom-up methods. There some explanation of the difference in the [TEDx talk by Guillaume Majeau-Bettez](#).

In another example the publication, [Under construction](#), from the New Zealand Green Building Council reports:

The top-down MFA reveals that the bottom-up calculations of building material consumption are in the same order of magnitude as the available national consumption figures, but on the low side. ...

(in bottom-up calculations) concrete was nearly 30% lower, reinforcing steel over 10% lower. Timber consumption was significantly lower than the available data.

5

## Estimates embodied carbon in cars

There is a wide range of estimates for the embodied carbon in cars. For example, the [Low Carbon Vehicle Partnership estimate](#) the embodied carbon in a “standard mid-sized gasoline ICE” to be 5.6 tonnes CO<sub>2e</sub> whereas Mike Berners Lee top-down estimates give the embodied carbon in a Ford Mondeo as 17 tonnes CO<sub>2e</sub> – three times greater.

There are some top-down estimates of the embodied carbon in ICE vehicles but there do not seem to be top-down estimates for complete BEVs. However, there are top-down estimates of embodied carbon in BEV batteries. [Hall and Lutsey compare estimates](#) of the carbon emissions due to battery manufacture. The estimates which used top-down analysis were significantly higher than those using bottom-up analysis.

The [attached spread sheet](#) (in PDF form) shows an attempt to make sense of some of the reports of the carbon emissions of cars during their lifetime. Here are tables that summarise the “results” for mid-sized cars. Assume car lifetimes are in the range 12 to 15 years.

### Lifetime emissions from Internal Combustion Engine (ICE) Vehicles

Lifetime kms	Lifetime Tonnes CO <sub>2e</sub>	Embodied Tonnes CO <sub>2e</sub>	Model	Source
150k	39	7	Average EU car	CB
217k	61	7	Mid ICE	UCS
150k	24	6	Standard gasoline	LowCVP
150k	44	17	Ford Mondeo	B-L + Which
243k	69	6	Mid-Size ICEV	ADL
150k	29	6	Mid-Size ICEV	PE (2020)
150k	35	8	Ford “Mondeo”	PE + Which

### Lifetime emissions from Battery Electric Vehicles (BEVs)

Lifetime kms	Lifetime Tonnes CO <sub>2e</sub>	Embodied Tonnes CO <sub>2e</sub>	Model	Source
150k	14	10	Nissan Leaf (UK)	CB
150k	14	10	Tesla 3 (US batteries)	CB
217k	30	9	Nissan Leaf (40kWh)	UCS
150k	19	9	Battery electric vehicle	LowCVP
243k	56	20	Mid-Size BEV	ADL

(40kWh Nissan Leaf has 84 Mile range, 75 kwh Tesla Model S7 has a 249 Mile range.)

The one that stands out is Berners-Lees’ estimate of the embodied carbon in a Ford Mondeo. It is the only estimate that uses top-down analysis and the estimate is roughly 10 tonnes CO<sub>2e</sub> higher than the others for ICEVs. All the estimates for BEV cars have used bottom-up analysis for estimating embodied carbon, suggesting that these estimates are too low – if top-down analysis is better than bottom-up analysis.

In the estimates of BEVs, the highest estimate is from the consultancy Arthur D Little. Their estimates include the embodied carbon in a replacement battery and, in use, the occasion drive in an ICE vehicle when the BEV range is too restrictive.

5a

## Estimates of lifetime emissions

This sample of estimates of the carbon footprint of cars has a wide range, with lifetime footprints centering around 40 tonnes CO<sub>2e</sub> for mid-range ICE cars and 25 tonnes CO<sub>2e</sub> for mid-range BEVs. Both these might be higher if top-down methods for estimating embodied carbon were used.



(Lifetimes are a bit less than 15 years.)

6

## Car footprints and the remaining carbon budget.

For the sake of discussion, let us divide the “fair remaining carbon budget” of 50 tonnes CO<sub>2</sub>e equally between categories “consumables”, “building”, “transport” and “government”. This gives 12.5 tonnes per person per category.

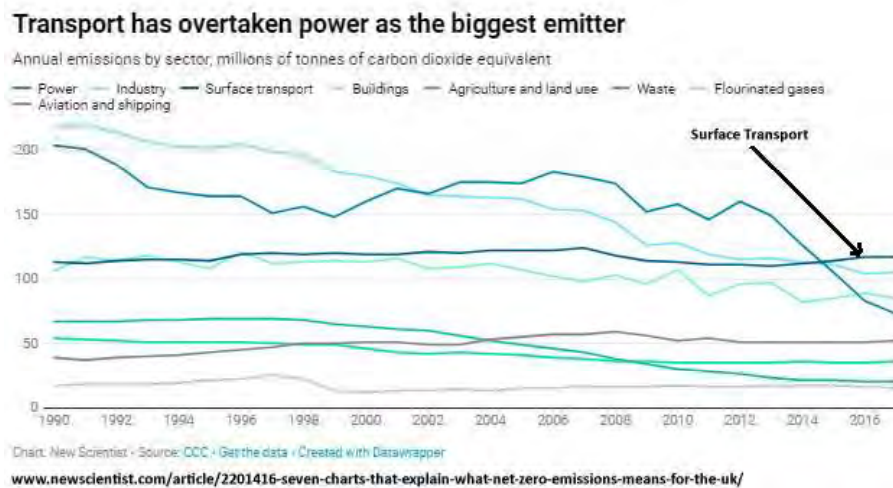
There are 32.5 million cars in the UK. In car owning households, that is more than one for every two people. For two people the remaining carbon budget for transport would be 25 tonnes CO<sub>2</sub>e. This means a new ICEV car would swamp this transport budget and a new BEV car would exhaust it in its lifetime.

After one car’s lifetime, will the owner buy another one more car?

7

## The emissions from surface transport have not been falling

According to UK Government’s latest statistics, Roads and Traffic(TSGBo7), cars made up 78% of the distance travelled on the roads. Also according to data from the Committee on Climate Change [charted by the New Scientist](#), it can be seen that emissions from surface transport have not fallen and that surface transport has overtaken the power sector as the UK’s biggest emitter.



Although no progress has been made in reducing the emissions from surface transport, many reports and commentators assume that the switch from ICE vehicles to electric vehicles will drastically cut emissions as the carbon intensity of the electricity grid and manufacturing processes reduces. Two comments are these:

First, the large embodied carbon in a Battery Electric Vehicle happens now using today’s manufacturing processes. For example, the steel used will not be low carbon steel from a process based on a cleaner hydrogen technology.

Second, when in use the BEV will initially be clocking up carbon emissions by using today’s electricity rather than lower projected ones for some future date.

Third, the enormous amount of productive capacity dedicated to car manufacture should be stopped because of its emissions or diverted to a green transition.

Well before any projected date for BEVs with sensibly low emissions, the personal fair remaining carbon budget will be exhausted.

8

## Summary

In households with at least one car, the carbon footprints of members of the household are very likely to exceed the fair remaining personal carbon budget in a handful of years. This leads to the same conclusion as the House of Commons Science and Technology Committee:

In the long-term, widespread personal vehicle ownership does not appear to be compatible with significant decarbonisation.

The House of Commons Science and Technology Committee was correct. We have this choice:

# Cars to drive or a planet to live in?

## Appendix CO2e

The UK Government’s publication [UK Carbon Footprint 1997-2016](#) gives the carbon footprint of the UK from 1997 to 2016 based on UK consumption. It gives measures in terms of CO2 and CO2e. On average the measures in terms of CO2e are 30% higher than those in terms of CO2.

Another ONS publication [Greenhouse gas emissions: 2013](#), says that CO2 was 84.4% UK emissions so the measure in terms of CO2e. As 100% is 18% higher than 84.4%, here the emissions in CO2e are reported as being 18% numerically higher than the emissions measured as CO2.

As a rough and ready estimate, in this note it is assumed that a budget of 40 tonnes CO2 has about the same effect as a budget of 50 tonnes CO2e.

10

## Postscript 22 April 2020: Transport & Environment

New discussions about the carbon footprints of a range of cars (petrol, diesel and electric) have been published in [How clean are electric cars?](#) by [Transport & Environment](#).

A relevant addition has been made to [the attached spreadsheet](#). The following is a table from the spreadsheet. Some details of the working can be found there.

### Transport & Environment (2020)

#### How clean are electric cars?

#### Car emissions after 150,000 kms, as tonnes CO2e

150k	45	6.8	Band B (Renault Clio)
150k	50	8.4	Band C (VW Golf)
150k	59	9.8	Band D (VW Passat)
150k	61	11.8	Band E (Audi A7)
150k	19	10.5	Band B (Renault Clio electric?)
150k	21	13.1	Band C (Nissan Leaf)
150k	27	15.8	Band D (Tesla 3)
150k	31	19.0	Band E (Tesla S)

These estimates seem to be in-line with others in this piece.

11

## Tweets:

The Polestar Battery Electric car from Volvo ” leaves the factory with a 26-tonne carbon footprint.”

26 tonnes CO2e! half a personal remaining carbon budget for 1.5C

Polestar aims to lead industry in environmental transparency  
[volvocars.com/au/about/austr...](http://volvocars.com/au/about/austr...)

"Using its own analysis, Polestar found the new



Polestar 2 electric GT car leaves the factory with a 26-tonne carbon footprint."

2:59 PM · Dec 2, 2020



Copy link to Tweet



1/2) Video presenting Auke Hoekstra's estimates of cars' embodied CO2:

Mercedes C220 diesel ...	8 tonnes
Tesla Model 3 ...	12.6 tonnes

In the same range as some studies in "Cars to drive or a planet to live in" but ...

	ElaadNL Webtalk # 4 Electric Cars Emit Even Less CO2 than Assumed ... <a href="https://youtube.com">youtube.com</a>
--	--

1:19 PM · Jan 10, 2021



1



1



Copy link to Tweet



and 2 others



So lifetime emissions (15yr)

40t CO2e for a mid-range gasoline

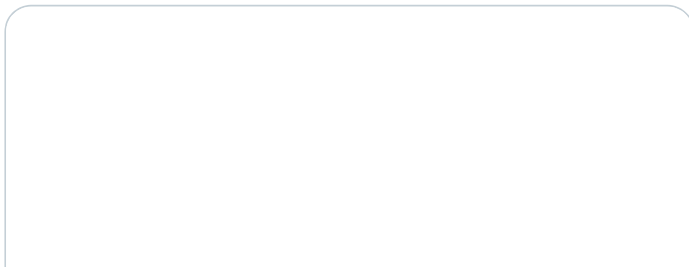
25t CO2e for a mid-range car.

Personal remaining carbon budgets:

42t CO2e for 1.5°C

92t CO2e for 2.0°C

(From Carbon Brief with CO2->Co2e adjustment  
'Refining remaining 1.5C 'carbon budget'  
[carbonbrief.org/guest-post-ref...](https://carbonbrief.org/guest-post-ref...))



Guest post: Refining the remaining 1.5C 'carbon budget' | Carbon Brief  
[carbonbrief.org](https://carbonbrief.org)



So what is your opinion on this?



Do electric cars really produce less CO2 than petrol cars? | Plug...  
Many people are concerned that the environme...  
[youtube.com](https://youtube.com)

7:02 AM · Jan 27, 2021



Copy link to Tweet

Figures from "How Bad are Bananas" by Mike Berners-Lee



**comment**



Another view:

How green is an electric car, really?

<https://www.topgear.com/car-news/electric/how-green-electric-car-really>

[Geoff Beacon](#) ( September 6, 2020 at 12:47 pm )

TrackBack URL :





# The York Local Plan: Climate change

Submission to the Public Inquiry on the 2018 York Local Plan

## Climate change

In September 2018, [the Secretary General of the United Nations, António Guterres, delivered a warning](#) [1]:

Dear friends of planet Earth,

Thank you for coming to the UN Headquarters today.

I have asked you here to sound the alarm.

Climate change is the defining issue of our time – and we are at a defining moment. We face a direct existential threat.

Climate change is moving faster than we are – and its speed has provoked a sonic boom SOS across our world.

If we do not change course by 2020, we risk missing the point where we can avoid runaway climate change, with disastrous consequences for people and all the natural systems that sustain us.

[The latest global temperatures from NASA](#) [2] add emphasis:

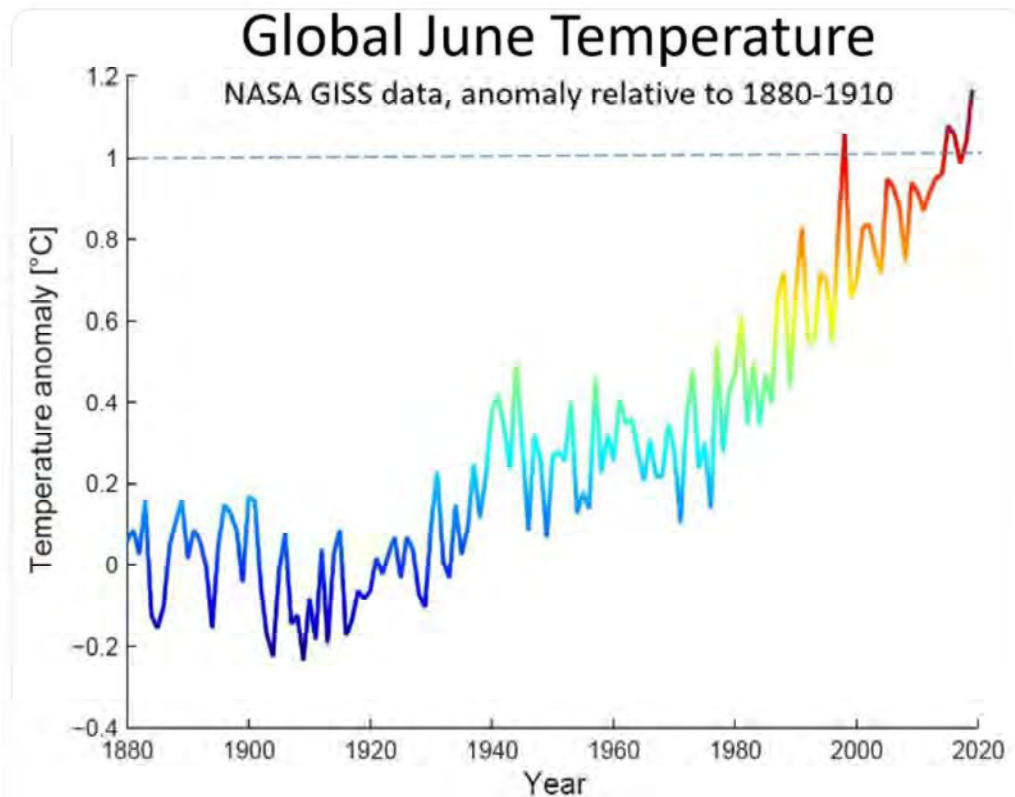


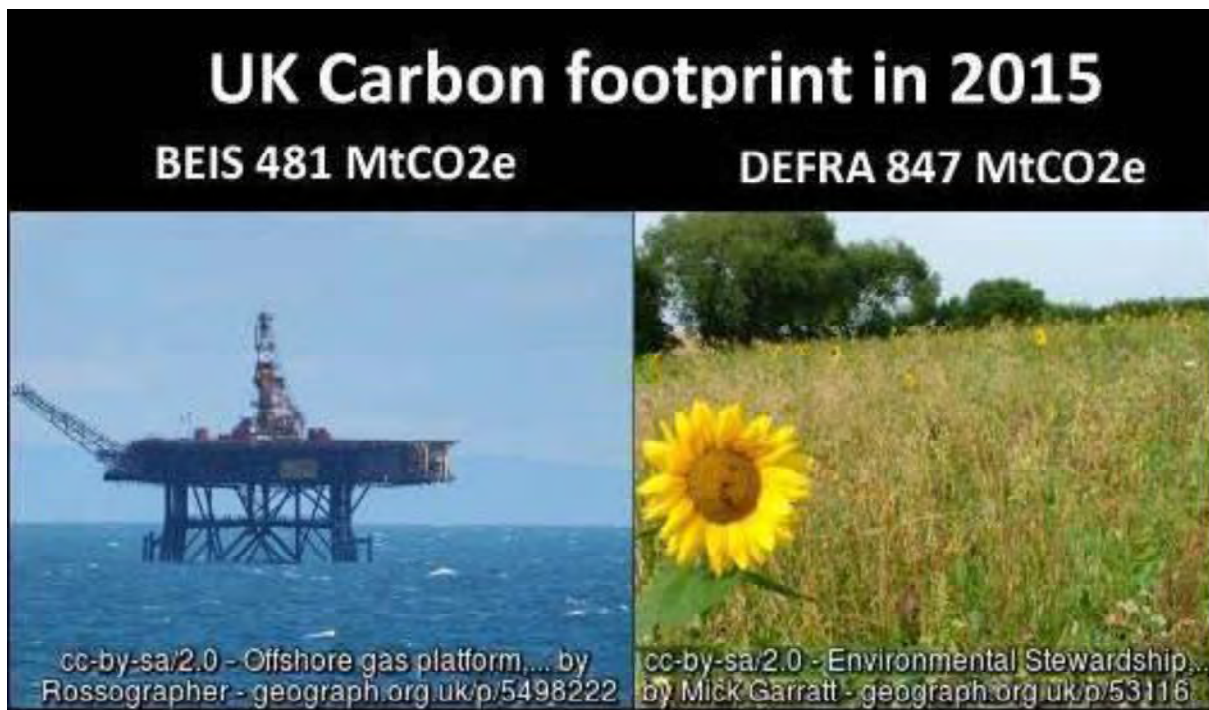
Figure 1

**Measuring greenhouse gas emissions: Lack of consistency**

When UK's emissions are measured using the method favoured by the Department of Business, Energy and Information Services (BEIS) the UK's carbon emissions are shown to decrease substantially since 1990. However, this measure does not include emissions from international air travel, shipping and emissions overseas from creating goods imported to the UK. When a UK steel works shuts this measure decreases.

The Department of Environment, Food and Rural Affairs (DEFRA) measures UK emissions differently based on the emissions caused by UK consumption. This method, consumption accounting, includes the effects of air travel, shipping and imports. When a UK steel works shuts this measure likely increases because of transport emissions and the carbon efficiency of the production of imported steel may be less.

The results from production and consumption accounting are substantially different as shown in Figure 2.



The figures above are in terms of Carbon Dioxide Equivalent. This combines the effects of different greenhouse gasses according to their warming effects over 100 years. This is a timescale much too long for the climate crisis. In particular, a shorter period would give methane much more weight in the calculation. Over 20 years the effect of methane is over three times as much. The main emissions of methane are from agriculture, fossil fuel extraction, landfill and biomass burning. In agriculture, emissions from animal husbandry and rice production are the biggest proportion. Beef, lamb and dairy have much higher impacts over 20 years

Figure 2



Consumption accounting (from DEFRA) is the method relevant to local plans, which can help shape lifestyles and resulting consumption patterns. Local plans have much less influence on patterns of production.

## **Resolution 42/187 of the United Nations General Assembly**

[Resolution 42/187 of the United Nations General Assembly](#) [4] says:

4. [The General Assembly agrees] further that an equitable sharing of the environmental costs and benefits of economic development between and within countries and between present and future generations is a key to achieving sustainable development;

Development can create large amounts of greenhouse gasses both in construction and enabling lifestyles with large emissions, at a time when the seriousness of climate change is being recognised as a fundamental threat to future generations. Large emissions are not consistent with UN Resolution 42/187.

## **Future generations and vulnerable populations**

For future generations and vulnerable populations, the consequences of Climate Change could be bad, very bad. [The Special Report by the IPCC on Global Warming of 1.5°C](#) [5] says:

B.5 Climate-related risks to health, livelihoods, food security, water supply, human security, and economic growth are projected to increase with global warming of 1.5°C and increase further with 2°C.

Climate Change will disproportionately affect vulnerable populations and so affect environmental costs 'between and within countries':

B.5.1 Populations at disproportionately higher risk of adverse consequences with global warming of 1.5°C and beyond include disadvantaged and vulnerable populations, some indigenous peoples, and local communities dependent on agricultural or coastal livelihoods (high confidence).

## **Carbon dioxide equivalent (CO<sub>2</sub>e) and the remaining carbon budgets**

Climate change is caused by emissions of greenhouse gasses from human activity. The most important greenhouse gas is carbon dioxide (CO<sub>2</sub>) but others, such as methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O), cause extra warming. To account for these other gasses a composite measure of the gasses a combined measure, Carbon Dioxide Equivalent (CO<sub>2</sub>e) is used.

Emissions of CO<sub>2</sub> are often made without reference to these other gasses: It is often assumed in national statistics that when a given amount of CO<sub>2</sub> is emitted it is accompanied by a proportional amount of other greenhouse gasses. Typically, this adds 30% to measures of CO<sub>2</sub> alone: e.g. 1 tonne of CO<sub>2</sub> is assumed to be accompanied by other greenhouse gasses to add up to 1.30 tonnes of CO<sub>2</sub>e.

## Carbon budget for 1.5°

In the IPCC's Table 2.2 of [Mitigation Pathways Compatible with 1.5°C in the Context of Sustainable Development](#), [6] (SR15, 2018) the remaining carbon budget for a 66% chance of keeping below 1.5°C is given as 420 Gt CO<sub>2</sub> from the beginning of 2018. (Gt means gigatons: a billion tonnes.) Subtracting the global CO<sub>2</sub> emissions in 2018 of 42 Gt CO<sub>2</sub> gives 378 Gt CO<sub>2</sub> from the beginning of 2019.

For the period 1997 – 2016, [DEFRA have produced figures for UK emissions](#) [7] in both CO<sub>2</sub> and CO<sub>2</sub>e. Over this period the emissions counted as CO<sub>2</sub>e are 30% higher than those counted as CO<sub>2</sub> alone. This is nearly the same in [a report by Carbon Market Watch on SR15](#) [4]. Using a 30% increase and an estimate of world population of 7.7 billion gives Table 1. This shows a remaining carbon budget, with a 66% chance of remaining under a 1.5°C rise in global temperature to be 64 tonnes CO<sub>2</sub>e per person.

Remaining carbon budget to keep Earth's temperature rise below 1.5°C			
Chance of success	33%	50%	67%
CO <sub>2</sub> from 1.1.2018	840	580	420
CO <sub>2</sub> from 1.1.2019	798	538	378
CO <sub>2</sub> e from 1.1.2019	1037	538	491
CO <sub>2</sub> e per human	135	91	64

CO<sub>2</sub> figures from Table 2.2, Special report on 1.5°C - <http://www.ipcc.ch/sr15/>  
CO<sub>2</sub>e figures are 30% higher.  
World population 7.7 billion. - <https://www.worldometers.info/>

**Table 1**

This estimate of 64 tonnes CO<sub>2</sub>e can be taken as a baseline personal remaining carbon budget for a 1.5°C increase in average global surface temperature. Such a rise is regarded as the threshold of dangerous climate.

To fulfil the requirement of UN 42/187 for "equitable sharing of the environmental costs" "between present and future generations" means the greenhouse gas emissions of individual lifestyles should not greatly exceed the baseline personal remaining carbon budget of 64 tonnes of CO<sub>2</sub>e.

## Global carbon emissions until carbon neutral is reached by 2050

Reaching zero carbon emissions by 2050 is a target sometimes attributed to the [Carbon Neutrality Coalition](#) [8] of countries.

Global fossil fuel emissions of CO<sub>2</sub> in 2018 were projected to be 37.1 Gt CO<sub>2</sub> by the [Global Carbon Project](#) [9], with a further 5.1 Gt CO<sub>2</sub> due to changes in land use – a total of 42.2 Gt CO<sub>2</sub>. Adding 30% to this figure to incorporate the effects of non-CO<sub>2</sub> greenhouse gasses gives 54.9 Gt CO<sub>2</sub>e. That is an average of 7.1 tonnes of carbon dioxide equivalent per year for every person currently on Earth – 7.7 billion.



Suppose that global greenhouse gas emissions were to fall by an equal amount every year to reach net zero in 2050. Current global emissions average 7.1 tonnes CO<sub>2</sub>e per capita. If they fell evenly from now until 2050, the total emissions per capita would be 111 tonnes CO<sub>2</sub>e per capita ( $111 = 7.1 * 31/2$ ).

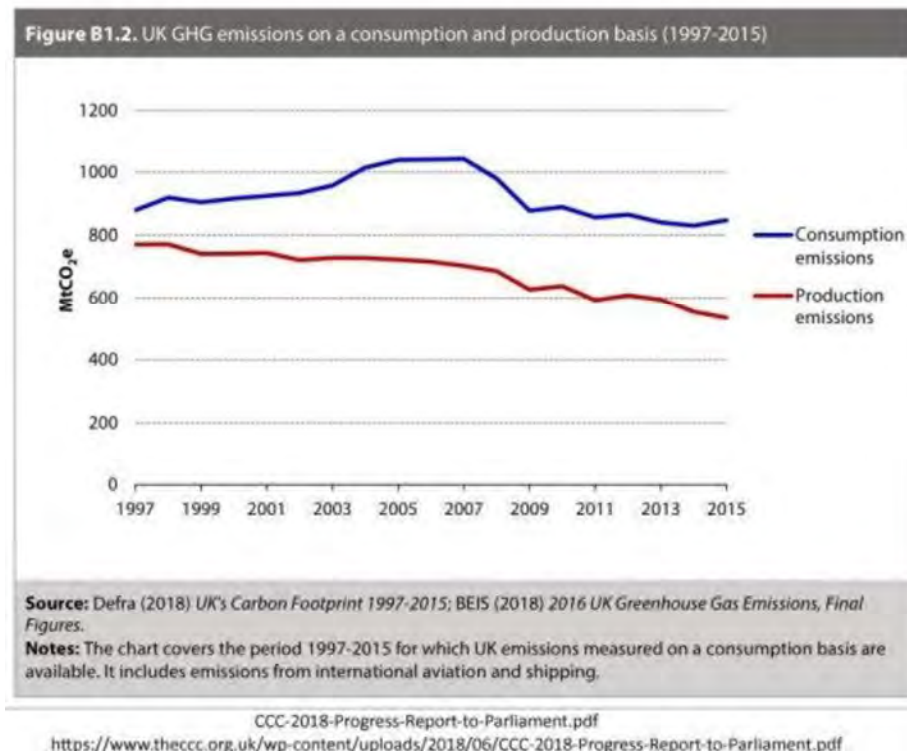
Falling by equal amounts every year until 2050 is an optimistic target given past performance but even this exceeds the remaining carbon budget for 1.5°C by 73%. Even under this optimistic scenario, current generations are being inequitable to future generations. To avoid a rise of 1.5°C in global mean surface temperature, immediate reductions in the emissions of greenhouse gasses are required – much greater than a steady fall by equal amounts until 2050.

## UK emissions

The UK government has also pledged that the UK becomes carbon neutral by 2050.

In [UK's Carbon Footprint 1997 – 2015](#) [6], DEFRA estimated that in 2015 UK greenhouse gas emissions were 847 million tonnes of CO<sub>2</sub>e. That is 13 tonnes CO<sub>2</sub>e per capita. If there were a steady fall until 2050, these emissions would total 202 tonnes CO<sub>2</sub>e per capita, ( $202 = 13 * 31/2$ ) exceeding the baseline personal remaining budget by 3.3 times.

Greenhouse gas emissions from the UK's power sector have been falling from 1990, by phasing out coal and increasing input from gas and renewables. However, the UK's carbon footprint, measured on a consumption basis is hardly falling.



**Figure 3**

## **Embodied carbon in buildings**

Finding a reliable source of the quantity of greenhouse gasses caused by the construction of buildings is difficult. However, it is clear that the construction industry is responsible for large emissions, mostly due to their use of raw materials. These become the 'embodied carbon' in buildings and other structures.

Awareness of embodied carbon in building is low and, there is resistance to acknowledge the issue despite [the work of the Royal Institute of Chartered Surveyors](#). [10]

One of the best available assessments of embodied carbon in building was published by Bioregional. This looked at the construction of BedZED, the Beddington Zero Energy Development, "the UK's first large-scale, mixed-use sustainable community comprises 100 homes, office space, a college and community facilities".

In [BedZED: Toolkit Part I](#) [11], it says

The total embodied CO<sub>2</sub> of BedZED is 675kg/m<sup>2</sup> , whilst typical volume house builders build to 600-800kg/m<sup>2</sup> . Despite the increased quantities of construction materials, the procurement of local, low impact materials has reduced the embodied impact of the scheme by 20-30%.

Without the "procurement of local, low impact materials", such as locally available recycled steel, the total embodied CO<sub>2</sub> of BedZED would be more than 800kg CO<sub>2</sub>/m<sup>2</sup>. This would mean that the embodied carbon for a 100 m<sup>2</sup> dwelling will be over 80 tonnes CO<sub>2</sub>. (As the main greenhouse gas emissions from construction are in the form of CO<sub>2</sub>, it may be plausible to convert this to 80 tonnes CO<sub>2</sub>e without addition.)

Another assessment of embodied carbon in building comes from Mike Berners-Lee. In [How bad are bananas](#) [12], he reports an assessment of "a brand-new cottage with two bedrooms upstairs and two receptions rooms and a kitchen downstairs". The result of the assessment gave a figure of 80 tonnes CO<sub>2</sub>e for the dwelling. These figures are appropriate to housing constructed from traditional materials, bricks, mortar, glass and steel.

For a conventional house, a 3 bed semi, I have received an estimate of embodied carbon from Bob Hill using the methodology of the Royal Institute of Chartered Surveyors. This arrived at a figure of 92.38 tonnes CO<sub>2</sub> for a 100m<sup>2</sup> semi-detached house. It included the pavement and half the road outside but made no allowance for constructing a garage.

## **Emissions from cars**

The carbon emissions from making a new car are large, Mike Berners Lee of Small World Consulting estimates that to manufacture a medium spec Ford Mondeo creates 17 tonnes of CO<sub>2</sub>e. The emissions for driving a car for 11,481 kilometres a year (a typical distance in the UK) for 13.9 years, ([the average lifetime of a car in the UK](#) [23]) is given in the following table.



### **CO2e in driving 11,481 kilometres a year for 13.9 years**

Car	Description	Tonnes CO2e: 13.9 years driving
Citroen C1	Basic spec	18
Ford Mondeo	Medium spec	27
Land Rover Discovery	Top of the range	43

*CO2 from Fleet News. Uprated 25% for extracting, processing fuel. ( Masnadi et al.)*

11,141 kilometres is the average distance UK cars travelled in 2017

13.9 years is the average age of cars that are scrapped in the UK

### **Embodied CO2e in manufacturing cars**

Car	Description	Tonnes CO2e to manufacture
Citroen C1	Basic spec	6
Ford Mondeo	Medium spec	17
Land Rover Discovery	Top of the range	35

*Source: How bad are bananas, Mike Berners-Lee*

### **CO2e in using a car for 11,481 kms a year for 13.9 years**

Car	Description	Total tonnes CO2e	% of personal budget
Citroen C1	Basic spec	25	39 %
Ford Mondeo	Medium spec	45	70 %
Land Rover Discovery	Top of range	80	125 %

11,481 kilometres is the average distance UK cars travelled in 2017

Remaining carbon budget per capita 64 tonnes CO2e. (Tokarska & Gillet via Carbon Brief)

Many motorists cannot fit within a remaining carbon budget of 64 tonnes CO2e simply from the use of their cars. If these levels of emissions continue into the lifetime of a second car none will.

Will electric cars come to the rescue? In the crucial period for global emissions, the next decade or so, the electricity that powers them will not be sufficiently decarbonised. In addition, the embodied carbon in electric cars is larger than cars powered by fossil fuels. See the video by Bjorn Lomborg, [Do electric cars really help the environment?](#) [15]

### **Wealthy residents are high carbon**

In general, the affluent have higher carbon footprints than the poor. In a publication commissioned by the Joseph Rowntree Foundation (JRF), [Distribution of Carbon Emissions in the UK: Implications for Domestic Energy Policy](#) [14], the Centre for Sustainable Energy looked at the emissions of CO2 by ten different income groups from the 10% with lowest income to the 10% with highest income. They analysed the emissions from household fuels, cars, public transport and international aviation. The following table uses the data from their Figure 10 to compare the income brackets for the lowest 20% of income with the highest 20%.

Income	Household Fuel	Car	Public Transport	International Aviation	Units
Lowest 20%	4.02	0.76	0.31	0.33	tonnes CO2/yr
Highest 20%	6.74	4.13	0.36	1.85	tonnes CO2/yr
Ratio High/Low	1.67	5.46	1.16	5.61	Ratio
Average all income	5.68	2.64	0.30	1.18	tonnes CO2/yr

Based on data behind Figure 10 in

**Distribution of Carbon Emissions in the UK: Implications for Domestic Energy Policy**

<https://www.jrf.org.uk/report/distribution-carbon-emissions-uk-implications-domestic-energy-policy>

**Figure 4**

In this table there are things to note:

P1) Household fuel was the largest source of emissions. That was mostly heating homes. The top 20% caused 67% more emissions, probably because they lived in bigger homes and had more money to spend on heating. As homes become better insulated and electricity is decarbonised, the carbon emissions from household fuel are expected to fall substantially.

P2) The emissions from cars was on average much greater than public transport or international aviation. These emissions are over five times higher in the top 20% of income compared to the lowest.

P3) The emissions from public transport are much smaller and do not vary greatly between income bands.

P4) The emissions from international air flights are significant: Large for those with higher incomes but small for those with low incomes.

## **The York Local Plan**

This section of my submission will concentrate on the residential aspect of the York Local Plan and its consequences for climate change.

### **The National Planning Policy Framework**

The [National Planning Policy Framework \(July 2018\)](#) [3] (NPPF) says in section 2, *Achieving sustainable development, paragraph 7*:

The purpose of the planning system is to contribute to the achievement of sustainable



development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs (Note 4) .

Note 4 refers to [Resolution 42/187 of the United Nations General Assembly](#) [4] as discussed above.

The proposed York Local Plan will create high emissions of greenhouse gasses in building construction and enable high-carbon lifestyles. The plan is contrary to the National Planning Policy Framework which demands an equitable sharing of environmental costs between present and future generations.

**York’s Sustainability Appraisal**

In June 2019, *Wood Environment & Infrastructure Solutions UK Limited* updated their *Sustainability Appraisal Report Addendum for City of York Local Plan*. This appraisal considered several aspects of sustainability including Objective 7, “To minimise greenhouse gases that cause climate change and deliver a managed response to its effects”. Entry 7 in *Table 2.1 SA Framework* is:

<p>7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects</p>	<p>Reduce or mitigate greenhouse gas emissions from all sources</p> <ul style="list-style-type: none"> <li>• Plan or implement adaptation measures for the likely effects of climate change</li> <li>• Provide and develop energy from renewable, low and zero carbon technologies</li> <li>• Promote sustainable design and building materials that manage the future risks and consequences of climate change</li> <li>• Adhere to the principles of the energy hierarchy</li> </ul>
--	--

Later in *Table 5.4 Updated results of the cumulative effects assessment*, the row *7. climate change* has a column for housing. It is marked “0/-“ meaning housing policies in the York Local Plan have either “No significant effect / no clear link between the policy and the SA objective” or “The policy is likely to have a negative effect on the SA objective”. In short, Wood Environmental are saying that housing policies in the York Local Plan are bad for climate change.

**Embodied carbon in buildings**

To get some idea of the scale of embodied carbon in dwellings in the York Local Plan, assume a conservative figure of 70 tonnes CO2e per dwelling. On the assumption that one dwelling has the UK average of 2.4 residents, the carbon emissions created by providing housing for one resident works out at 29 tonnes CO2e per resident. This is a very large proportion of a personal remaining carbon budget of 64 tonnes CO2e. %%%%

Under the list of objectives in the *Sustainability Appraisal Report Addendum*, it says:

Promote sustainable design and building materials that manage the future risks and consequences of climate change.

Such 'promotion' has not affected the construction of recent developments in York, like at Hungate and Derwenthorpe, where high carbon elements like concrete slabs, structural steel and brickwork have been clearly visible. In planning processes in York, there seems little real consideration of embodied carbon.

Some housebuilders claim that using different methods of construction, enough carbon can be stored in buildings so that the embodied carbon is negative (i.e. The construction process, including materials, has the net effect of extracting CO<sub>2</sub> from the atmosphere.) Two sample approaches are provided by UK Hempcrete and Baufriz. Baufriz have actually claimed that the embodied CO<sub>2</sub> in one of their buildings can store the equivalent 50 tonnes of CO<sub>2</sub>. Such claims should be examined closely. However, it is almost certain that some form of building is possible that will extract CO<sub>2</sub> from the atmosphere as a result of its construction.

I have had considerable correspondence on this issue over the past decade. This includes BRE Limited, Bioregional, The Inventory of Carbon and Energy (ICE), The Association for Environment Conscious Building, Department of Trade and Industry, The Department for Communities and Local Government and York Council.

Sadly, awareness of the issue of embodied carbon in building is small and, I have detected resistance to acknowledge the issue despite the good work by the Royal Institute of Chartered Surveyors.

**The York Local Plan should require that buildings should set a limit on the carbon emissions caused by building construction. If possible, building structure should store carbon.**

### **The York Local Plan will attract wealthy residents**

Professor Mark Tewdwr-Jones caused a stir in the media by suggesting that [York and three other northern cities should be now considered part of London](#) [13]. He said:

There are several ways you could define a northern region, but perhaps the most pertinent question is 'where does London end?'

My map is a northern area defined as being 'not London', where London's sphere of influence extends over most of the country, determined by two-hour commuting patterns to London, which is becoming the norm.

It is now possible to reach London from York Station in under two hours and when (or if) the HS2 rail project reaches York, it will be nearer 90 minutes. This makes York a very attractive place



for Londoners, who want to keep connections with London but can cash in on the fact that in certain residential areas of London house prices are three or more times greater than those in York.

The relevance of affluent people moving to York in the York Local Plan is that affluent people have higher carbon footprints than the less affluent. Much of the proposed housing will be such that they are encouraged in their high carbon lifestyles.

**The effect of the York Local Plan will be to enable high carbon lifestyles, it should be rethought.**

### **Derwenthorpe, a ‘sustainable’ development**

An example of the likely carbon footprints of the residents of the new greenfield dwellings in the York Local Plan, is the “sustainable” development at Derwenthorpe by the Joseph Rowntree Housing Trust. The related Joseph Rowntree Foundation commissioned a report to assess the environmental sustainability of Dewenthorpe residents. The study, [A sustainable community? Life at Derwenthorpe 2012–2015](#) [16] was produced by the Centre for Housing Policy and the Stockholm Environment Institute at the University of York. The study reported the carbon footprints of residents of Derwenthorpe using the [REAP petite assessment method](#) [17]. It reported:

Derwenthorpe carbon footprints were lower than the UK mean (at 14.52 tonnes compared with 16.24 tonnes per year).

The estimated carbon emissions of the residents of Derwenthorpe mean they reach the the budget of 64 tonnes CO<sub>2</sub>e within five years. The report also noted that residents of Derwenthorpe had higher carbon footprints than the average for York (14.52 as opposed to York’s 14.30 tonnes CO<sub>2</sub>e per year).

Broken down into categories the footprints given were:

**Carbon emissions by category, Derwenthorpe**

Category	Tonnes CO <sub>2</sub> e per year	Percentage of total
Power	1.53	10.54%
Food	2.35	16.18%
Travel	4.3	29.61%
Shopping	1.52	10.47%
Activities	0.96	6.61%
Other	3.86	26.58%
Total	14.52	100.00%

A sustainable community? Life at Derwenthorpe 2012–2015  
<https://www.jrf.org.uk/report/sustainable-community-life-derwenthorpe>

## Figure 5

The “learning points” of the research found that “Households’ home energy footprints are easier for developers to influence than transport footprints.”

For new buildings, developers can insulate buildings to a high standard and provide other energy saving measures, such as ground source heat-pumps, but it is much harder to influence the transport footprints of those households, which have cars.

The Derwenthorpe development has been billed as ‘sustainable’. It is not.

**When developments are claimed to be ‘sustainable’ they should be thoroughly examined.**

### **Car-free development: The only plausible future**

In Derwenthorpe, there is one parking space per dwelling.

*Table 16: Individual footprints...* of [Life at Derwenthorpe](#) shows the results for 40 residents, only one of which was in a household without a car. This resident had the lowest carbon footprint at 8.12 tonnes CO<sub>2</sub>e/year, compared to an average of 14.52 tonnes. The maximum footprint was measured at 30.82 tonnes CO<sub>2</sub>e per year.

These estimates for Derwenthorpe included a fixed figure, 'other', of 3.86 tonnes of CO<sub>2</sub>e/year as a standard amount applied to all UK measurements. This is based on the individual share of emissions associated with government spending on hospitals, roads etc. This is not under the control of residents and cannot be influenced by the York Local Plan.

The rest of the footprint may be regarded as 'voluntary' i.e. It is the behaviour of the residents that generate that part of the footprint. Without the 'involuntary' addition, the carbon footprints for the respondents would be: lowest 4.26; mean 10.66; maximum 26.96 tonnes CO<sub>2</sub>e/year. The household with the smallest footprint was the only one without a car.

The minimum 'voluntary' footprint of the car-free resident was 40% of the average 'voluntary footprint' and 16% of the maximum. That resident is car-free and (relatively) low-carbon.

To comply with the requirements of the NPPF, new developments should be low-carbon and keep within remaining carbon budgets.

**Residential developments in the York Local Plan must be car-free.**



## **A further conclusion**

The situation is so serious that flying in planes, eating beef or regularly travelling in private cars, are contrary to Resolution 42/187. A local plan cannot easily affect holiday flights or diet but in making provision for a high level of car ownership and the polluting lifestyles that go with it, the current version of the local plan is contrary to UN Resolution 42/187 and so contrary to the new NPPF.

## **Postscript: Climate feedbacks**

There are feedbacks within the climate system not yet counted in climate models. Nearly all of these exacerbate the problem of climate change. They make the excessive greenhouse gas emissions which would be caused by the York Local Plan more worrying.

I have had personal experience of how these have been omitted from the predictions of climate science:

**In 2012**, I was raising this issue of climate feedbacks through my MP. The Parliamentary Office of Science and Technology responded:

The general consensus was that at the present time the evidence base is insufficient for a POSTnote to be undertaken and any briefing would end up simply calling for more research to fill the information gaps, which is something we generally try to avoid as it isn't that informative for policymakers.

**In 2014**, the Parliamentary Office of Science and Technology produced [POSTnote 454, Risks from Climate Feedbacks](#) [19]. This concluded:

Compared to existing model estimates, it is likely that climate feedbacks will result in additional carbon in the atmosphere and additional warming. This is because the majority of poorly represented climate feedbacks are likely to be amplifying feedbacks. This additional atmospheric carbon from climate feedbacks could make it more difficult to avoid a greater than 2°C rise in global temperatures without additional reductions in greenhouse gas emissions. The strength of many amplifying feedbacks is likely to increase with warming, which could increase the risk of the climate changing state (Box 3). Some commentators suggest the uncertainties in our knowledge of carbon cycle and physical feedbacks may mean the Earth will warm faster than models currently estimate

**In 2016**, [scientists at the Department of Energy and Climate Change replied to me](#) [20] concerning positive feedbacks

1. Am I correct in thinking that some of these feedbacks were not used in the models that calculated the “remaining carbon budgets” – as used in the IPCC AR5?

That’s correct, the models used vary in what they include, and some feedbacks are absent as the understanding and modelling of these is not yet advanced enough to include. From those you raise, this applies to melting permafrost emissions, forest fires and wetlands decomposition.

2. Are there other missing feedbacks that should be considered?

The feedbacks you mention are certainly important, although there are several other feedbacks that could be included but are currently too difficult to model. As knowledge and understanding advances, they will be added to the climate models.

Permafrost emissions, forest fires and wetlands decomposition were not counted and “there are several other feedbacks that could be included”.

**In 2019**, these feedbacks are still not be properly incorporated in climate models – although some like the wildfires (now even in the Arctic) are now newsworthy. More worryingly, scientists are beginning to look at “cascading tipping points” as described in [the video by Paul Beckwith](#) [21].

## **Hyperlinks to references**

- [1] <https://www.un.org/sg/en/content/sg/statement/2018-09-10/secretary-generals-remarks-climate-change-delivered>
- [2] <https://twitter.com/rahmstorf/status/1150826482555637762>
- [3] <https://www.gov.uk/government/news/governments-new-planning-rulebook-to-deliver-more-quality-well-designed-homes>
- [4] <http://www.un.org/documents/ga/res/42/ares42-187.htm>
- [5] [https://www.ipcc.ch/site/assets/uploads/sites/2/2019/02/SR15\\_Chapter2\\_Low\\_Res.pdf](https://www.ipcc.ch/site/assets/uploads/sites/2/2019/02/SR15_Chapter2_Low_Res.pdf)
- [6] [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/794557/Consumption\\_emissions\\_April19.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/794557/Consumption_emissions_April19.pdf)
- [7] <https://carbonmarketwatch.org/2018/10/08/new-ipcc-report-shows-1-5c-is-still-possible-but-more-needed-from-aviation-and-shipping/>
- [8] <https://www.carbon-neutrality.global/high-level-inaugural-event-of-the-carbon-neutrality-coalition/>
- [9] <https://www.globalcarbonproject.org/carbonbudget/index.htm>
- [10] <http://www.rics.org/uk/knowledge/professional-guidance/professional-statements/whole-life-carbon-assessment-for-the-built-environment-1st-edition/>
- [11] [https://www.bioregional.com/wp-content/uploads/2014/11/BedZED\\_toolkit\\_part\\_1.pdf](https://www.bioregional.com/wp-content/uploads/2014/11/BedZED_toolkit_part_1.pdf)
- [12] <https://profilebooks.com/how-bad-are-bananas.html>
- [13] <https://www.thetimes.co.uk/article/leeds-isn-t-in-the-north-says-academic-it-s-in-london-b6l0cqtcw>
- [14] <https://www.jrf.org.uk/report/distribution-carbon-emissions-uk-implications-domestic-energy-policy>
- [15] [https://www.youtube.com/watch?v=17xh\\_VRmMU](https://www.youtube.com/watch?v=17xh_VRmMU)
- [16] <https://www.jrf.org.uk/report/sustainable-community-life-derwenthorpe>
- [17] <http://www.reap-petite.com/>



[18] <http://www.brusselsblog.co.uk/york-central-a-climate-disaster/>

[19] <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/POST-PN-454>

[20] <http://www.brusselsblog.co.uk/carbon-budgets-a-straightforward-answer-from-decc/>

[21] <https://youtu.be/G25dGJ3yUYk>

[22] [http://eprints.whiterose.ac.uk/79131/14/Carbon Reduction and Travel Behaviour - Discourses, Disputes and Contradictions in Governance.pdf](http://eprints.whiterose.ac.uk/79131/14/Carbon%20Reduction%20and%20Travel%20Behaviour%20-%20Discourses,%20Disputes%20and%20Contradictions%20in%20Governance.pdf)

[23] <https://www.smmmt.co.uk/industry-topics/sustainability/average-vehicle-age/>

[Redacted]

**From:** [Redacted]  
**Sent:** 07 July 2021 17:37  
**To:** localplan@york.gov.uk  
**Subject:** City of York Local Plan - Proposed Modifications - Consultation Response - Redrow ST8 North  
**Attachments:** Redrow ST8 North CYC Proposed Mods Response 07-07-21.pdf; ST8 North - Redrow - CYC Proposed Mods Form 07-07-21.pdf

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir or Madam,

Please find attached a completed Consultation Response Form and Statement sent on behalf of Redrow Homes in relation to their ongoing land interests north of SST8, York.

Please could you acknowledge receipt of the attachments.

Kind regards

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]



# City of York Local Plan Proposed Modifications Consultation Response Form 25 May – 7 July 2021

OFFICE USE ONLY:

ID reference:

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

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors 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 A carefully before completing the form. Please ensure you sign the form on page 2.**

**Please fill in a separate Part C for each issue/representation you wish to make.** Failure to fully complete Part C of this form may result in your representation being returned. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

## Part A - How we will use your Personal Information

When we use your personal data, CYC complies with data protection legislation and is the registered 'Controller'. Our data protection notification is registered with the Information Commissioner's Office (ICO) – reference **Z5809563**.

**What information will be collected:** The consultation only looks at the specific proposed modifications and specific evidence base documents and not other aspects of the plan. The representations should therefore focus only on matters pertaining to those main modifications and documents being consulted upon. We are collecting personal details, including your name and address, alongside your opinions and thoughts.

**What will we do with the information:** We are using the information you give us with your consent. You can withdraw your consent at any time by contacting the Forward Planning team at [localplan@york.gov.uk](mailto:localplan@york.gov.uk) or 01904 552255.

The information we collect will be provided to the Planning Inspectors, together with a summary of the main issues raised during the representations period and considered as part of the Local Plan examination<sup>1</sup>. Response will be made available to view as part of the Examination process and 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. We will protect it and make sure nobody has access to it who shouldn't and we will not keep it for longer than is necessary.

We will not use the information for any other purpose than set out in this privacy notice and will not disclose to a third party i.e. other companies or individuals, unless we are required to do so by law for the prevention of crime and detection of fraud, or, in some circumstances, when we feel that you or others are at risk.

You can find out more about how the City of York Council uses your information at <https://www.york.gov.uk/privacy>

We will also ask you if you want to take part in future consultations on planning policy matters including Supplementary Planning Documents and Neighbourhood Plans.

**Storage of information:** We will keep the information you give us in CYC's secure network drive and make sure it can only be accessed by authorised staff.

**How long will we keep the information:** The response you submit relating to this Local Plan consultation can only cease to be made available 6 weeks after the date of the formal adoption of the Plan<sup>2</sup>. When we no longer have a need to keep your information, we will securely and confidentially destroy it. Where required or appropriate, at the end of the retention period we will pass onto the City Archives any relevant information.

**Further processing:** If we wish to use your personal information for a new purpose, not covered by this Privacy Notice, we will provide you with a new notice explaining the purpose prior to commencing the processing and the processing conditions. Where and whenever necessary, we will seek your consent prior to the new processing.

**Your rights:** To find out about your rights under data protection law, you can go to the Information Commissioners Office (ICO): <https://ico.org.uk/for-the-public/>

You can also find information about your rights at <https://www.york.gov.uk/privacy>

If you have any questions about this privacy notice, want to exercise your rights, or if you have a complaint about how your information has been used, please contact us at [information.governance@york.gov.uk](mailto:information.governance@york.gov.uk) on 01904 554145 or write to: Data Protection Officer, City of York Council, West Offices, Station Rise, York YO1 6GA.

**1. Please tick the box to confirm you have read and understood the privacy notice and consent to your information being used as set out in the privacy notice**

**2. Please tick the box to confirm we can contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents.**

Signature

Date

07/07/2021



## Part B - Personal Details

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

3. Personal Details		4. Agent's Details (if applicable)
█		█
██████		█
██████		██████
██████	██████	██████████████
██████		
█████ - ███	██████████	██████████
█████ - ███		██████████
█████ - ███		█
█████ - ███		
█████ - ███ 5		
██████		██████
██████████		██████████████
██████████		██████████

# Guidance note

## Where do I send my completed form?

Please return the completed form **by Wednesday 7 July 2021, 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](mailto:localplan@york.gov.uk)

You can also complete the form online at:

[www.york.gov.uk/form/LocalPlanConsultation](http://www.york.gov.uk/form/LocalPlanConsultation).

## What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and supporting evidence base, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018 and following the phase 1 hearing sessions in December 2019 as part of the Examination into the Plan. You can make comments on any of the proposed modifications and a number of evidence base documents as set out below. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

- City of York Local Plan Composite Modifications Schedule (May 2021) [[EX/CYC/58](#)] and City of York Local Plan Publication Draft (February 2018) [[CD001](#)] **to be read alongside the comprehensive schedule of proposed modifications only**
- York Economic Outlook (December 2019) Oxford Economics [[EX/CYC/29](#)]
- CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return (December 2019) [[EX/CYC/32](#)]
- Affordable Housing Note Final (February 2020) [[EX/CYC/36](#)]
- Audit Trail of Sites 35-100 Hectares (June 2020) [[EX/CYC/37](#)]
- Joint Position Statement between CYC and Selby DC Housing Market Area (April 2020) [[EX/CYC/38](#)]
- G L Hearn Housing Needs Update (September 2020) [[EX/CYC/43a](#)]
- Habitat Regulation Assessment (HRA) (October 2020) Waterman Infrastructure and Environment Limited [[EX/CYC/45](#)] and Appendices (October 2020) [[EX/CYC/45a](#)]
- Key Diagram Update (January 2021) [[EX/CYC/46](#)]
- Statement of Community Involvement Update (November 2020) [[EX/CYC/49](#)]
- SHLAA Update (April 2021) [[EX/CYC/56](#)]
- CYC SuDs Guidance for Developers (August 2018) [[EX/CYC/57](#)]
- Topic Paper TP1: Approach to defining York's Green Belt (Addendum) (January 2021) [[EX/CYC/59](#)]
  - Annex 1: Evidence Base (January 2021) [[EX/CYC/59a](#)]
  - Annex 2: Outer Boundary (February 2021) [[EX/CYC/59b](#)]
  - Annex 3: Inner Boundary (Part: 1 March 2021 [[EX/CYC/59c](#)], Part 2: April 2021 [[EX/CYC/59d](#)] and Part 3 April 2021) [[EX/CYC/59e](#)]
  - Annex 4: Other Urban Areas within the General Extent (April 2021) [[EX/CYC/59f](#)]
  - Annex 5: Freestanding Sites (March 2021) [[EX/CYC/59g](#)]
  - Annex 6: Proposed Modifications Summary (April 2021) [[EX/CYC/59h](#)]
  - Annex 7: Housing Supply Update (April 2021) [[EX/CYC/59i](#)] and Trajectory Summary (April 2021) [[EX/CYC/59j](#)]
- City of York Council Strategic Flood Risk Assessment (SFRA) Level 1 Report [[EX/CYC/60](#)]
- Sustainability Appraisal of the Composite Modifications Schedule (April 2021) [[EX/CYC/61](#)]



### **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 Inspectors 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 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.

You can use our online consultation form via [www.york.gov.uk/form/LocalPlanConsultation](http://www.york.gov.uk/form/LocalPlanConsultation) or send back your response via email to [localplan@york.gov.uk](mailto:localplan@york.gov.uk). **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response. We also need your confirmation that you consent to our Privacy Policy (Part A of this form).**

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

Yes, you can. Where there are groups who share a common view, 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 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 B of this form the group you are representing.

### **Do I need to attend the Public Examination?**

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. You can indicate if 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 Inspectors will use their 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 Consultation documents?**

Copies of the consultation documents are available to view on the council's website at <https://www.york.gov.uk/LocalPlanConsultation>.

In line with the current pandemic, we are also making the documents available for inspection by appointment only at City of York Council Offices, if open in line with the Government's Coronavirus restrictions. To make an appointment to view the documents, please contact the Forward Planning team via [localplan@york.gov.uk](mailto:localplan@york.gov.uk) or on 01904 552255.

Documents are also available to view electronically via Libraries, if open in line with Government Coronavirus restrictions. See our [Statement of Representations Procedure](#) for further information.

# Part C -Your Representation

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



## 5. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

Document:

Housing Needs Update – EX/CYC/43a and Topic Paper 1 Addendum EX/CYC/59, 59a, 59d

Page Number:

## 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](http://www.york.gov.uk/localplan) or sent by request.

## 6. Based on the Proposed Modification or new evidence document:

### 6.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

### 6.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

### 6.(3) Please justify your answer to question 6.(1) and 6.(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.

## 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

## **7. Based on the Proposed Modification or new evidence document:**

### **7.(1) Do you consider that the Local Plan is Sound?**

Yes

No

### **7.(2) Please tell us which tests of soundness are applicable to 7.(1):**

(tick all that apply)

**Positively prepared**

**Justified**

**Effective**

**Consistent with national policy**

### **7.(3) Please justify your answers to questions 7.(1) and 7.(2)**

Please use extra sheets if necessary

Please see supporting statement attached.

Housing Need Update – Fails to meet the full OAHN.

TP1 Addendum – Issues with the methodology; inadequate justification for the inclusion of land north of ST8 within the Green Belt.

**8. (1) Please set out any 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 7 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 and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Increase the size of ST8.

Increase the housing requirement.

Designate safeguarded land.

Recommend that upon Adoption a review of the Local Plan is immediately triggered.

**9. If your representation is seeking a change at question 8.(1)**

**9.(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 Inspectors by way of written representations.

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

It is considered necessary to participate orally to represent the landowner of land north of ST8 and allow the opportunity to present the case for delivery of the site and answer any questions of the Inspector.

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

Representations must be received by Wednesday 7 July 2021, up until midnight.  
Representations received after this time will not be considered duly made.





**CITY OF YORK LOCAL PLAN  
PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION**

**LAND NORTH OF ST8 MONKS CROSS, YORK**

**On Behalf of Redrow Homes**

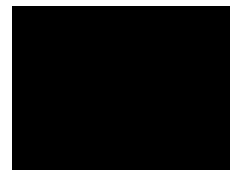
**June 2021**



**CONTENTS**

- 1. INTRODUCTION
- 2. HOUSING NEED UPDATE – G L HEARN
- 3. GREEN BELT EVIDENCE – TP1 ADDENDUM
- 4. CONCLUSIONS





## 1.0 Introduction

- 1.1 This response has been prepared on behalf of Redrow Homes in relation to their continued land interests north of ST8 Monks Cross, east of Huntington. Previous submissions have been made to the various draft Local Plan iterations and Examination Hearing Statements, the content of which remains relevant.
- 1.2 Of relevance, an Outline Planning Application for the development of circa 970 dwellings including infrastructure, open space, primary school, associated community facilities, convenience store and Country Park was submitted by Redrow Homes (Yorkshire) Limited in January 2018 on the full extent of the emerging Local Plan ST8 site. The application remains undetermined (18/00017/OUTM). ST8 is sited immediately south of North Lane, as highlighted in purple on the front cover. The extent of land relating to this submission is highlighted in orange.
- 1.3 Our clients continue to object to the boundary of ST8. It is essential that the detailed Green Belt boundaries are the most appropriate long-term boundaries for the plan period, and beyond. It is considered that the ST8 boundary as proposed, misses an opportunity of allocating further land to create a truly sustainable urban extension. It is maintained that the proposed Green Belt inner boundary, which includes land north of North Lane within the Green Belt will not fulfil Green Belt requirements and should not be included within the Green Belt.
- 1.4 Despite over 2,000 pages of additional evidence provided as part of the proposed modifications and additional supporting evidence consultation, there is very little change in the City of York Local Plan. The housing number remains unchanged, and the Council's Green Belt evidence addendum has not altered the approach to allocating sites and defining the Green Belt boundaries. It is not considered that the Green Belt Addendum provides a fully justified reasoning for the resultant inner Green Belt boundaries.

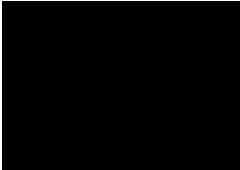


## **2.0 G L Hearn Housing Needs update, September 2020 – EX/CYC/43a**

### **Proposed Modifications PM50, PM53, PM54, PM63a and PM63B**

- 2.1 We continue to object to the Council's approach to identifying Local Housing Need and their continued use of the 2018 projections despite the PPG requiring the continued use of the 2014 based household projections.
- 2.2 We refer to previous comments made to the Proposed Modifications in June 2019 on behalf of Redrow Homes which raised concerns regarding the G L Hearn January 2019 Housing Needs Update. The September 2020 Housing Needs Update proposes no further changes and concludes that the housing need in the City has not changed materially since the last assessment in January 2019, hence the continuation of the 790 dwellings per annum requirement (plus 32 dpa to meet the shortfall between 2012 and 2017).
- 2.3 In alignment with HBF comments on the housing Needs Update and modifications relating to the annual net housing provision in Policy SS1 it is recommended that the housing requirement is increased to reflect the most up to date Standard Method. The HNA includes the 2020 Standard Method calculation at 1,026 dpa.
- 2.4 We are aware that the Government guidance for the continued use of the 2014-based projections relates to calculating housing need using the standard method in the updated NPPF, which differs from the City of York Local Plan that has been submitted and is being examined under the transitional arrangements and against the 2012 NPPF. The housing requirement in the York Local Plan has been calculated using the Objectively Assessed Needs identified through a SHMA. That said, it remains that it would logically apply that the Government's concern with the 2016 and 2018 based projections would also apply to Authorities calculating housing need under the transitional arrangements and OAN calculations.
- 2.5 It should be noted that since the September 2020 Housing Needs Update the Affordability Ratio has been updated and for the year 2020 the median house price to median earnings ratio for 2020 is 8.04 (slightly lower than the 2019 ratio of 8.2). The standard methodology, using the present 10 year period (2021 – 2031) results in a housing need of 1,013 per annum. This is slightly lower than the 2020 calculation included in the HNA Update at 1,026 dpa, but is nevertheless similar and is significantly higher than the G L Hearn HNA of 790 dpa. Clearly the direction of travel remains above 1,000 dwellings per annum.



- 
- 2.6 The implications of fixing a housing requirement via the Local Plan that is lower than justified has significant implications for York, and will lead to the worsening of an already severe affordability situation. It is likely that the affordability ratio in York will continue to remain high, particularly if there is pent up demand as a result of a restricted housing requirement. Based on the direction of travel, it is likely that the housing requirement will be increased in future reviews, therefore continuing to restrict the housing requirement now will make it increasingly difficult to deliver a potentially significant increase in housing requirement via future reviews.
- 2.7 We are aware that Lichfields have undertaken a critique of the G L Hearn HNA Update which concludes that the housing requirement fails to meet the full OAHN, which is considered to be significantly higher than the Council has estimated. Lichfields consider that a greater market signals uplift should be applied; considers a further 10% uplift would be appropriate to address affordable housing need; proposes an additional 92 dpa for student growth targets; and highlights concerns regarding the calculation of past housing delivery. As a result, Lichfields calculate the OAHN requirement at **1,010** dpa which is not dissimilar to the 1,013 dpa Standard Method figure. Factoring in shortfall of housing delivery results in a Lichfields Local Plan requirement of **1,111** dpa.
- 2.8 Based on the Lichfields 1,010 dpa OAHN and the Council's housing supply, it is unlikely that the Council will be able to demonstrate a 5 year housing land supply upon adoption of the Local Plan. The identification of additional sites in the Local Plan would rectify this situation.

**Recommendation:**

**In order to make the Local Plan sound, it is recommended that the Housing Requirement in Policy SS1 is increased to a minimum of 1,013 in line with the Standard Method Local Housing Need calculation.**

**Should the Council continue to progress the Local Plan under the transitional arrangements and seek a lower housing requirement it is recommended that upon Adoption, a review of the Local Plan is immediately triggered to ensure the Local Plan is updated in line with the Standard Method and Framework.**

**We continue to recommend that the undersupply of 512 is annualised over the first 5 years of the Plan rather than over the Plan Period.**




### 3.0 Green Belt Evidence Update

#### Topic Paper TP1 Approach to defining York's Green Belt - Addendum January 2021 EX/CYC/59, 59a, 59d

- 3.1 The following section relates to the Green Belt Addendum evidence and highlights the concerns of our clients with the updated evidence.
- 3.2 The Council through this Local Plan are setting the 'inner boundary' of the Green Belt that envelops the City for the first time. This is **not** a modification exercise that requires exceptional circumstances to be demonstrated to release land for housing that abuts the inner boundary.
- 3.3 The Green Belt TP1 Addendum clarifies the position that no exceptional circumstances are required for any of the Green Belt boundaries as the Green Belt is not proposing to establish any new Green Belt. The York Green Belt is already established and the York Local Plan is not, as a matter of general principle, seeking to establish a new Green Belt. The York Local Plan is tasked with formally defining the detailed inner boundary and outstanding sections of the outer boundary of the York Green Belt for the first time.
- 3.4 Paragraph 85 of the Framework (2012) states that when defining Green Belt boundaries, local planning authorities should not include land which it is unnecessary to keep permanently open, with paragraph 79 stating that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.
- 3.5 The resultant land to the west and north of ST8 Monks Cross is not considered to be necessary to keep permanently open in order to protect the primary purpose of the York Green Belt, which is to protect the historic setting and character of York.
- 3.6 In considering the Green Belt purposes it is agreed that purpose 2 ("to prevent neighbouring towns merging into one another") does not apply in York, given that it does not have any major towns close to the general extent of the York Green Belt therefore the potential of towns merging is not applicable. It is also established and agreed in the TP1 Addendum that purpose 5 ("to assist in urban regeneration, by encouraging the recycling of derelict and other urban land") is not considered a purpose of itself which assists materially in determining where any individual and detailed part of the boundary should be set (TP1 Addendum paragraph 5.8 - 5.9).
- 3.7 This leaves 3 purposes which are relevant for determining individual Green Belt boundaries in the City of York.
- To check the unrestricted sprawl of large built-up areas



- 
- To assist in safeguarding the countryside from encroachment; and
  - To preserve the setting and special character of historic towns.
- 3.8 The primary emphasis is placed on purpose 4 relating to the historic character and setting of York. In this context ST8 and land north and west of Monks Cross, the land is undefined in Figure 3 Green Belt Appraisal on page 32 of the TP1 Addendum. The land therefore does not fall within any of the identified areas that are of 'most' importance to purpose 4 of the Green Belt, which area Strays, Green Wedges, Extensions of the Green Wedges, River corridors, Area retaining the rural setting of the City, Village Setting, and Areas preventing coalescence.
- 3.9 It is maintained that, whilst ST8 is supported, defining land to the west and north of ST8 within the Green Belt is inappropriate. The land will not serve any meaningful Green Belt function.
- 3.10 Paragraph 5.32 of TP1 states that "The Green Belt Appraisal and Heritage Topic Paper highlights that compactness is a key contributor to York's historic character and setting, with a key feature of the main urban area's setting being that it is contained entirely within a band of open land set within the York Outer Ring Road, which offers a viewing platform of the city within its rural setting. "
- 3.11 Not defining Site ST8 and the land immediately north and west of ST8 in the Green Belt will not affect this feature. A landscaped buffer could be incorporated adjacent to the Outer Ring Road, immediately adjacent to land north of ST8 to maintain a 'band of open land'. The ST8 proposals incorporate open space and area for Suds on the eastern edge in between the Outer Ring Road and Monks Cross Link Road. This will maintain the 'band of open land'. The development of ST8 will disrupt any views from the Outer Ring Road of the existing open land immediately adjacent to the eastern edge of Huntington and west of ST8. It is maintained that the allocation of ST8 will not harm the key compactness contributor to the historic setting and character of York. The same applies to land immediately west and north of ST8.
- 3.12 ST8 and land north and west of ST8 aligns with the Council's strategic aims of channelling development towards urban areas and promoting sustainable patterns of development. The ST8 allocation and additional land north and west will form a wholly logical extension to the eastern urban edge of York, which would be contained within the Outer Ring Road. The retention of a landscaped buffer adjacent to the Outer Ring Road north of North Lane would maintain separation between the urban edge and the Outer Ring Road.




## **TP1 Addendum – Section 8: Methodology – Defining Detailed Boundaries**

- 3.13 In summary, the methodology identifies five criteria with which to assess individual boundaries which fall within the three established relevant Green Belt purposes. Three criteria relate to the primary Green Belt purpose 4 – preserving the setting and special character of historic towns. These are compactness; landmark monuments; and landscape and setting. One criterion is identified against each of the other relevant Green Belt purposes 1 and 3. These are urban sprawl and encroachment. There are a number of questions asked within each of these criteria which form the basis of the individual boundary analysis contained in the Addendum Annexes 3, 4 and 5. The relevant Annex in relation to land at Monks Cross is Annex 3 (Inner Boundary Part 2: Sections 5; Boundary 21-27).
- 3.14 A criticism of the Methodology for defining detailed boundaries is the lack of consideration of the potential development put forward and the potential for an alternative boundary which allows for appropriate development to be accommodated in the longer term. Whilst baseline mapping is referenced in TP1 Section 8 methodology, including ground data, topography and key approaches and access routes, there is no reference to the consideration of proposed development put forward by interested parties. This is relevant in the context of consideration of alternative development opportunities west and north of the ST8 allocation.
- 3.15 Proposals put forward by the landowners of land west and north of ST8 will result in the retention of a gap between the urban edge and the Outer Ring Road, including the provision of a buffer adjacent to the Outer Ring Road north of North Lane. The ‘containment’ of the urban area will be maintained, and it is considered that the openness will not be compromised.

## **TP1 Addendum - Section 10: Enduring Boundaries and Safeguarding**

- 3.16 The Council maintain in the TP1 Addendum that it is not necessary to designate safeguarded land to provide permanence to the Green Belt. We disagree with the Council’s conclusion and continue to consider that the identification of safeguarded land is appropriate.
- 3.17 The identification of Safeguarded Land is considered particularly important as the Local Plan will define 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 reviews. 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.

- 3.18 Given the passage of time in progressing the York Local Plan, the planned five year additional land identification to 2038 to extend beyond the 2033 plan period end date has almost passed. We are already four years into the plan period, so the five year buffer is dwindling, and will be even less by the time the Plan is eventually adopted. Upon the eventual adoption of the Local Plan there will be less than 20 years of Green Belt permanence. The justification to identify safeguarded land for beyond 2038 is now even stronger.

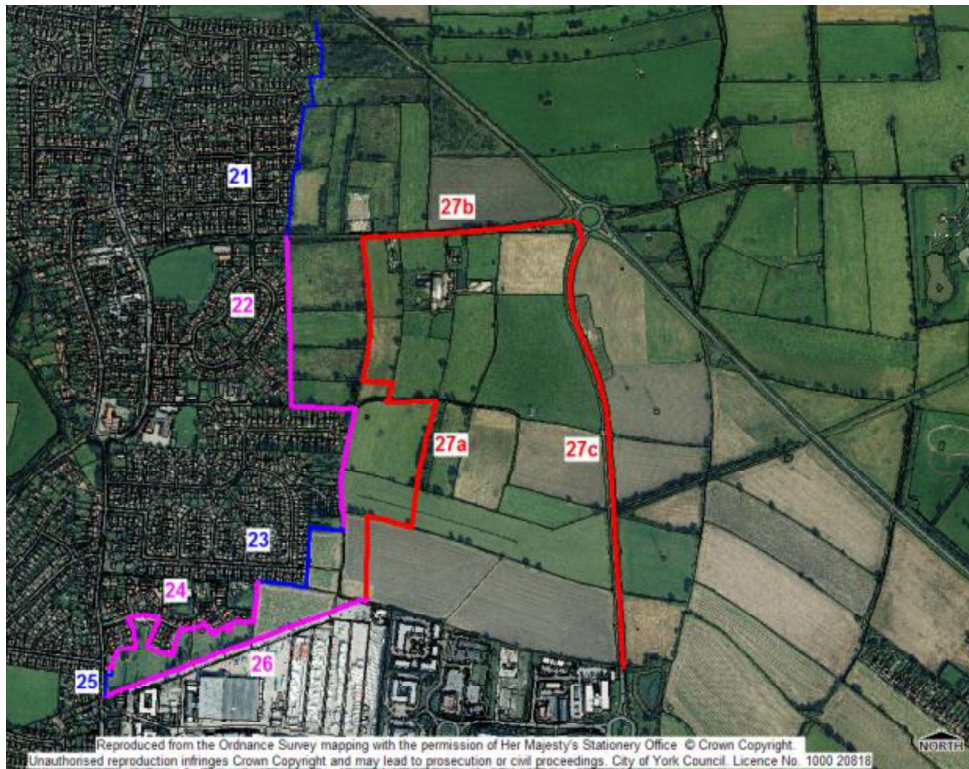
**TP1 Annex 1 (EX/CYC/59a)**

- 3.19 Within TP1 Addendum Annex 1, there are a number of baseline maps that have been prepared as a desktop exercise. We are informed that Annex 1 is a starting point to identify accessibility to different parcels of land on the periphery of the urban area, and that “they have also provided an indication of where these routes might form “open approaches” from which views might be important in enhancing the understanding or significance of York.”
- 3.20 The Outer Ring Road is identified in Annex 1 Figure 6 as a ‘Main Road Approach’, however no ‘long distance views (panoramic, key and general views) are interrupted by ST8 or land to the north or west (Annex 1 figure 13a). There are a number of panoramic, dynamic, general and key views identified in figure 13b, including a selection of views from the Outer Ring Road. The land east of Huntington, covering ST8 and land north and west of ST8 is not contained within any of these ‘historic city-wide’ views. Further, TP1 Annex 3 Inner boundaries 21 – 27, refers to glimpses of views, and existing dense screening along certain sections of the Outer Ring Road at this location. There are limited long distance views of the City from the Outer Ring Road west of ST8.
- 3.21 In relation to ‘Historic Core Views Analysis of Long Distance Views’ (Annex 1 figure 13a), ST8 and land north and west of ST8 is not crossed by any panoramic, key or general views. There are a number of panoramic, dynamic, general and key views identified in figure 13b, including a selection of views from the Outer Ring Road. ST8 and surrounding land is not contained within any of these city-wide views.



**TP1 Annex 3 Inner Boundary – Section 5 (EX/CYC/59d)**

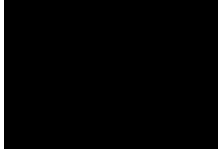
3.22 The relevant boundaries that have been assessed against the 5 criteria set out in the Methodology for the ST8 site and land north and west of ST8 are Inner Boundary Section 5, Boundaries 21 to 27 as identified in the below TP1 Addendum Annex 3 extract which shows the boundary assessment in blue and pink and the proposed boundary in red.



3.23 As stated, the promoters of ST8 Monks Cross continue to support the ST8 allocation, however maintain that the boundary of ST8 is not the most appropriate option. ST8 is identified in the Draft Local Plan as a 'Residential Urban Extension' and yet it is proposed to extend north of Monks Cross business park and remain separate from the existing Huntington residential edge. This results in an unconnected urban extension with a thin strip of land between the existing residential urban edge and the proposed residential urban extension which will serve no Green Belt function.

3.24 It is maintained that a more appropriate sustainable option would be to connect the urban extension to Huntington. The Local Plan misses the opportunity to deliver to deliver the ST8





site as a sustainable urban extension to the existing residential urban edge, including a portion of development north of North Lane, contained within the Outer Ring Road.

- 3.25 It is considered that the Local Plan fails to make the best use of land within the Outer Ring Road and there is a missed opportunity of taking advantage of existing infrastructure. It is considered that an alternative and appropriate approach would be to fix the Outer Ring Road as the Green Belt boundary with fixed landscape corridors within the Outer Ring Road, which would allow the use of remaining undeveloped non-Green Belt land contained within the Outer Ring Road boundary to be utilised for development. This alternative approach would be consistent with national policy guidance at paragraph 85 (2012 Framework) in relation to defining Green Belt boundaries.


### **Boundary 21 - 27 Assessment**

- 3.26 No consideration has been given to the creation of a new, more defensible Green Belt boundary by extending the urban edge at this location. The following text analyses the Council's assessment of boundary's 21-27 against the 5 criteria outlined in the Methodology.

#### Green Belt Purpose 4 – Preserving the setting and special character of historic towns

##### Criterion 1 – Compactness:

- 3.27 It is not considered that the alternative Green Belt boundary which would exclude land west and north of ST8 would detrimentally affect the understanding of the compact city within the original countryside context. Whilst the Outer Ring Road offers open views of the main urban area, it is established in the Council's own assessment that views of the urban area at this location are glimpses, due to the dense landscape screening. The narrowest part of open land to the north of North Lane is densely screened when travelling south eastwards (clockwise) along the Outer Ring Road. Views of Huntington and the City further south west are not visible. Whilst land immediately north of North Lane is more visible from the Outer Ring Road when travelling anti-clockwise on the Outer Ring Road, the views are not of the City, they are of the eastern edge of Huntington. Any limited long distant views of the City from the Outer Ring Road will be further diminished by the ST8 development to the south of North Lane. It is maintained that a countryside buffer could be developed alongside the Outer Ring Road, building on the existing dense screening through careful masterplanning.
- 3.28 Reference in the Council's analysis to reducing the openness between the densely built-up edge of Huntington and the ring road does not appear to factor in the effect of the ST8 urban extension. The creation of a new urban edge to Huntington via the ST8 development will result



in land west of ST8 not being visible from the Outer Ring Road. Its retention in the Green Belt will no longer maintain a connection to the open and historic setting.

Criterion 2 – Landmark Monuments:

- 3.29 The boundary assessment refers to land as having “the potential to be in the foreground of views of the Minster from higher ground to the south of Malton, which show this landmark in the context of the compact city and its open countryside.” Should views of the Minster be visible, there are opportunities through design of creating open corridors free from development to maintain any longer distant views. This has not been taken into consideration in the analysis.

Criterion 3 – Landscape and Setting:


- 3.30 Land immediately east of ST8 is proposed to be maintained as open land as part of the ST8 development. Land to the north, of ST8, north of North Lane only offers glimpsed views from the Outer Ring Road to the south west due to existing screening. The creation of a landscape buffer either side of North Lane, as well as alongside the Outer Ring Road could mitigate this criterion and maintain an understanding of the relationship of the city to its hinterland.
- 3.31 There is no analysis of the setting in relation to the land west of the proposed ST8 boundary, and it is considered, due to the development ST8, that this land is not important to the landscape and setting of the City.
- 3.32 Overall, it is not considered that the TP1 Addendum information provides a clear and justified reason for the detrimental impact that the release of land north of North Lane and west of ST8 will have on the Green Belt purpose 4 (Preserving the setting and special character of historic towns).

Green Belt Purpose 1 – Checking unrestricted sprawl

Criterion 4 – Urban Sprawl:

- 3.33 It is not considered that the farms north and south of North Lane ‘pose a risk to sprawl or ribbon development’ as described in the Council’s analysis, given that the proposed ST8 development south of North Lane will extend further east, up to the Monks Cross Link Road.
- 3.34 The existing nature conservation designations north of the dismantled railway (west of ST8) and north of North Lane (outside of Redrow control) will protect this land from development. There is no need to define these areas within the Green Belt.



- 
- 3.35 We disagree with the Council's analysis against this Criteria which refers to land north and east of the proposed boundaries being extensive and representing a "huge swathe of land which would constitute unacceptable sprawl." As already stated, land east of the Monks Cross Link Road is not proposed to be developed and is proposed as open land and Suds. This is an appropriate Green Belt land use, and therefore the Monks Cross Link Road could form a logical and defensible Green Belt boundary. Land to the north of Monks Cross, north of North Lane, within Redrow control can be appropriately developed, with landscape buffers. The Outer Ring Road at this location forms the most logical and defensible long term Green Belt boundary to constrain urban sprawl.

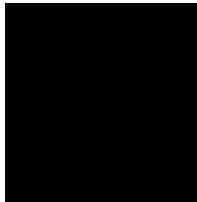
Green Belt Purpose 3 – Safeguarding the countryside from encroachment

Criterion 5 – Encroachment:

- 3.36 The wider countryside north and west of ST8 is severed by the Outer Ring Road. Land west of ST8 between Monks Cross Link Road and the Outer Ring Road is not proposed for development and is proposed as open space and Suds. The countryside feel of this site will be maintained. The limited nature of the proposed developable area north of North Lane, with proposed landscaped buffers adjacent to the Outer Ring Road that is contained by an existing nature conservation designation to the immediate north will not result in significant or detrimental encroachment into the countryside.

Local Permanence:

- 3.37 The assessment does not refer to considering alternative boundaries and refers to the proposed boundary using robust and permanent features. There is scope to protect land west of ST8 in between Huntington and ST8 via existing designations e.g. the existing Nature Conservation designation, as well as the fact that public open space incorporating sports pitches is also proposed immediately west of the ST8 allocation. There will therefore remain pockets of undeveloped land in between the urban extension and the existing urban edge that can be protected via open space and nature conservation designations. What is remaining does not perform any vital Green Belt function enough to warrant its inclusion in the Green Belt.
- 3.38 Whilst arguably North Lane forms an existing robust boundary, it is argued that in terms of long term Green Belt permanence, the Outer Ring Road is a more appropriate long term boundary. Pockets of land north of North Lane is already protected via a Nature conservation designation, and appropriate landscape buffering can be assigned to land adjacent to the Outer Ring Road, such that the remaining land north of North Lane will not perform any vital Green Belt function enough to warrants its inclusion in the Green Belt.



Determining a clear, defensible boundary

3.39 The proposed western boundary of ST8 is agreed in this instance. This will form a logical and defensible Green Belt boundary. It is however considered the Green Belt boundary should follow the Outer Ring Road north westwards from the junction of the Outer Ring Road and Monks Cross Link/North Lane, and exclude land west of the Outer Ring Road from the Green Belt. This makes the most logical and appropriate long term Green Belt boundary.

3.40 The proposed western boundary of ST8 is not supported. The proposed western boundary of ST8 (Boundary 27a) is not defensible, as recognised by the Council in TP1 Addendum Annex 3 (Page A3.453) whereby in assessing boundary 27a it states:

*“The southern section of this boundary cuts across two fields and does not follow any features on the ground therefore a new recognisable and permanent boundary will need to be created in this location as part of the development.”*

3.41 It is maintained that the western boundary of ST8 is illogical and the TP1 Addendum evidence offers no justified explanation as why the retention of a thin strip of Green Belt in between Huntington and ST8 is appropriate and effective. The Council’s approach and resultant ‘residential urban extension’ that is unattached from the residential urban edge does not constitute sustainable development. The desire to create a ‘green wedge’ in between Huntington and ST8 does not warrant the inclusion of the land within the Green Belt.

3.42 It is maintained that a more appropriate and sustainable option would be to connect the ST8 ‘residential urban extension’ to Huntington.



## 4. CONCLUSIONS

- 4.1 The detailed analysis of the Council's TP1 Addendum update has found that there are deficiencies in the approach taken. The fair consideration of alternatives does not appear to have been taken into consideration. The alternative of including land west and north of ST8 would result in the provision of a larger developable area, located in a sustainable location, accessible to existing services and infrastructure. This would align with the Council's strategy and growth focus towards the urban area, all contained within the Outer Ring Road.
- 4.2 Concerns remain with the Council's Housing Need update and continued justification for a housing requirement of 790 dpa. It is considered that the housing requirement in the Local Plan should be 1,013 dpa. On this basis alone, it is considered additional land is required to be identified. Further, given the passage of time and the failure to secure a Local Plan, there is now even more of a justification to add safeguarded land into this Plan. The additional land north and west of ST8 would assist in plugging the gap of meeting housing need within or beyond the plan period either as an alternative boundary to ST8 or via a safeguarded designation.
- 4.3 There is the opportunity here to create a longer-term Green Belt boundary by excluding land west and north of ST8 from the Green Belt and defining appropriate landscape buffers and green wedges. This will result in a more appropriate and justified robust, defensible and legible Green Belt boundary.
- 4.4 While our clients are supportive of the identification and allocation of housing land at ST8, they remain opposed to the manner in which the Plan misses the opportunity to deliver a larger the site as a sustainable urban extension to the existing urban edge. The updated TP1 Addendum fails to sufficiently address this missed opportunity and fails to adequately justify the resultant inclusion of Green Belt land west and north of ST8, which does not fulfil Green Belt purposes. In this instance there is clearly a more appropriate, sensible and plan-led solution to the extent of ST8.

**From:** [REDACTED]  
**Sent:** 06 July 2021 20:13  
**To:** localplan@york.gov.uk  
**Subject:** Local Plan Modification & Evidence Base Consultation - Representations on behalf of York St John University  
**Attachments:** Local Plan Proposed Modifications Consultation Response Form 2021.pdf; YSJ Northfield Reps ysjulp2107.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Please find attached representations submitted on behalf of York St John University.

Kind regards

[REDACTED]



# City of York Local Plan Proposed Modifications Consultation Response Form 25 May – 7 July 2021

OFFICE USE ONLY:

ID reference:

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

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors 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 A carefully before completing the form. Please ensure you sign the form on page 2.**

**Please fill in a separate Part C for each issue/representation you wish to make.** Failure to fully complete Part C of this form may result in your representation being returned. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

## Part A - How we will use your Personal Information

When we use your personal data, CYC complies with data protection legislation and is the registered 'Controller'. Our data protection notification is registered with the Information Commissioner's Office (ICO) – reference **Z5809563**.

**What information will be collected:** The consultation only looks at the specific proposed modifications and specific evidence base documents and not other aspects of the plan. The representations should therefore focus only on matters pertaining to those main modifications and documents being consulted upon. We are collecting personal details, including your name and address, alongside your opinions and thoughts.

**What will we do with the information:** We are using the information you give us with your consent. You can withdraw your consent at any time by contacting the Forward Planning team at [localplan@york.gov.uk](mailto:localplan@york.gov.uk) or 01904 552255.

The information we collect will be provided to the Planning Inspectors, together with a summary of the main issues raised during the representations period and considered as part of the Local Plan examination<sup>1</sup>. Response will be made available to view as part of the Examination process and 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. We will protect it and make sure nobody has access to it who shouldn't and we will not keep it for longer than is necessary.

We will not use the information for any other purpose than set out in this privacy notice and will not disclose to a third party i.e. other companies or individuals, unless we are required to do so by law for the prevention of crime and detection of fraud, or, in some circumstances, when we feel that you or others are at risk.

You can find out more about how the City of York Council uses your information at <https://www.york.gov.uk/privacy>

We will also ask you if you want to take part in future consultations on planning policy matters including Supplementary Planning Documents and Neighbourhood Plans.

**Storage of information:** We will keep the information you give us in CYC's secure network drive and make sure it can only be accessed by authorised staff.

**How long will we keep the information:** The response you submit relating to this Local Plan consultation can only cease to be made available 6 weeks after the date of the formal adoption of the Plan<sup>2</sup>. When we no longer have a need to keep your information, we will securely and confidentially destroy it. Where required or appropriate, at the end of the retention period we will pass onto the City Archives any relevant information.

**Further processing:** If we wish to use your personal information for a new purpose, not covered by this Privacy Notice, we will provide you with a new notice explaining the purpose prior to commencing the processing and the processing conditions. Where and whenever necessary, we will seek your consent prior to the new processing.

**Your rights:** To find out about your rights under data protection law, you can go to the Information Commissioners Office (ICO): <https://ico.org.uk/for-the-public/>

You can also find information about your rights at <https://www.york.gov.uk/privacy>

If you have any questions about this privacy notice, want to exercise your rights, or if you have a complaint about how your information has been used, please contact us at [information.governance@york.gov.uk](mailto:information.governance@york.gov.uk) on 01904 554145 or write to: Data Protection Officer, City of York Council, West Offices, Station Rise, York YO1 6GA.

1. Please tick the box to confirm you have read and understood the privacy notice and consent to your information being used as set out in the privacy notice

2. Please tick the box to confirm we can contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents.

Signature

Date



## Part B - Personal Details

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

3. Personal Details		4. Agent's Details (if applicable)
[REDACTED]		
[REDACTED]		
[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]
[REDACTED]		[REDACTED]
[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]
[REDACTED]		[REDACTED]

# Guidance note

## Where do I send my completed form?

Please return the completed form **by Wednesday 7 July 2021, 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](mailto:localplan@york.gov.uk)

You can also complete the form online at:

[www.york.gov.uk/form/LocalPlanConsultation](http://www.york.gov.uk/form/LocalPlanConsultation).

## What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and supporting evidence base, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018 and following the phase 1 hearing sessions in December 2019 as part of the Examination into the Plan. You can make comments on any of the proposed modifications and a number of evidence base documents as set out below. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

- City of York Local Plan Composite Modifications Schedule (May 2021) [[EX/CYC/58](#)] and City of York Local Plan Publication Draft (February 2018) [[CD001](#)] **to be read alongside the comprehensive schedule of proposed modifications only**
- York Economic Outlook (December 2019) Oxford Economics [[EX/CYC/29](#)]
- CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return (December 2019) [[EX/CYC/32](#)]
- Affordable Housing Note Final (February 2020) [[EX/CYC/36](#)]
- Audit Trail of Sites 35-100 Hectares (June 2020) [[EX/CYC/37](#)]
- Joint Position Statement between CYC and Selby DC Housing Market Area (April 2020) [[EX/CYC/38](#)]
- G L Hearn Housing Needs Update (September 2020) [[EX/CYC/43a](#)]
- Habitat Regulation Assessment (HRA) (October 2020) Waterman Infrastructure and Environment Limited [[EX/CYC/45](#)] and Appendices (October 2020) [[EX/CYC/45a](#)]
- Key Diagram Update (January 2021) [[EX/CYC/46](#)]
- Statement of Community Involvement Update (November 2020) [[EX/CYC/49](#)]
- SHLAA Update (April 2021) [[EX/CYC/56](#)]
- CYC SuDs Guidance for Developers (August 2018) [[EX/CYC/57](#)]
- Topic Paper TP1: Approach to defining York's Green Belt (Addendum) (January 2021) [[EX/CYC/59](#)]
  - Annex 1: Evidence Base (January 2021) [[EX/CYC/59a](#)]
  - Annex 2: Outer Boundary (February 2021) [[EX/CYC/59b](#)]
  - Annex 3: Inner Boundary (Part: 1 March 2021 [[EX/CYC/59c](#)], Part 2: April 2021 [[EX/CYC/59d](#)] and Part 3 April 2021) [[EX/CYC/59e](#)]
  - Annex 4: Other Urban Areas within the General Extent (April 2021) [[EX/CYC/59f](#)]
  - Annex 5: Freestanding Sites (March 2021) [[EX/CYC/59g](#)]
  - Annex 6: Proposed Modifications Summary (April 2021) [[EX/CYC/59h](#)]
  - Annex 7: Housing Supply Update (April 2021) [[EX/CYC/59i](#)] and Trajectory Summary (April 2021) [[EX/CYC/59j](#)]
- City of York Council Strategic Flood Risk Assessment (SFRA) Level 1 Report [[EX/CYC/60](#)]
- Sustainability Appraisal of the Composite Modifications Schedule (April 2021) [[EX/CYC/61](#)]



### **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 Inspectors 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 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.

You can use our online consultation form via [www.york.gov.uk/form/LocalPlanConsultation](http://www.york.gov.uk/form/LocalPlanConsultation) or send back your response via email to [localplan@york.gov.uk](mailto:localplan@york.gov.uk). **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response. We also need your confirmation that you consent to our Privacy Policy (Part A of this form).**

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

Yes, you can. Where there are groups who share a common view, 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 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 B of this form the group you are representing.

### **Do I need to attend the Public Examination?**

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. You can indicate if 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 Inspectors will use their 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 Consultation documents?**

Copies of the consultation documents are available to view on the council's website at <https://www.york.gov.uk/LocalPlanConsultation>.

In line with the current pandemic, we are also making the documents available for inspection by appointment only at City of York Council Offices, if open in line with the Government's Coronavirus restrictions. To make an appointment to view the documents, please contact the Forward Planning team via [localplan@york.gov.uk](mailto:localplan@york.gov.uk) or on 01904 552255.

Documents are also available to view electronically via Libraries, if open in line with Government Coronavirus restrictions. See our [Statement of Representations Procedure](#) for further information.

# Part C -Your Representation

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



## 5. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

EX/CYC/59; EX/CYC/59d; EX/CYC/46

Document:

TP1 Addendum; TP1 Addendum Annex 3; Key Diagram Update

Page Number:

Various

## 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](http://www.york.gov.uk/localplan) or sent by request.

## 6. Based on the Proposed Modification or new evidence document:

### 6.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

### 6.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

### 6.(3) Please justify your answer to question 6.(1) and 6.(2)

We make no representations on Legal Compliance, or on the Duty to Cooperate.

## What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

## 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

## **7. Based on the Proposed Modification or new evidence document:**

### **7.(1) Do you consider that the Local Plan is Sound?**

Yes

No

### **7.(2) Please tell us which tests of soundness are applicable to 7.(1):**

(tick all that apply)

**Positively prepared**

**Justified**

**Effective**

**Consistent with national policy**

### **7.(3) Please justify your answers to questions 7.(1) and 7.(2)**

Please use extra sheets if necessary

Designating Northfield as Green Belt is in conflict with draft policy ED5 and the wider Local Plan strategy objectives to meet the identified needs of York St John University. It would seriously constrain the University's ability to expand its sporting provision through additional development (e.g. indoor facilities) which would be supported by policy ED5 but would not accord with Green Belt policy, which covers only provision of outdoor sport facilities in its exceptions to inappropriate development in Green Belt

There is a clear recognition in the Council's evidence base of the need to support additional facilities at the Sport Park, and that these are to be provided at Northfield. This aim would clearly be frustrated by the proposed Green Belt boundaries at the site.

The Council's approach to justifying inner Green Belt boundaries, and assessing the contribution Northfield makes to Green Belt purposes, is fundamentally flawed. Contrary to the CYC assessment, the Northfield site is not countryside. It is part of a busy sports campus which is used by students across a wide range of courses, by student sports clubs, and by the wider community. The land does not serve any of the 3 Green Belt purposes relevant to York, and there is no evidence to support the Council's case that it should be kept permanently open.

#### **Test 1: Positively prepared:**

The proposed Green Belt boundaries, and inclusion of Northfield as Green Belt land, is inconsistent with the Local Plan strategy to meet objectively assessed development requirements by supporting the further expansion of the Sport Park at Northfield

**Test 2: Justified**

The proposed inclusion of Northfield within the Green Belt is not justified when considered against the Council's own evidence. The land does serve the three Green Belt purposes relevant to York, and there exist alternative options for robust boundaries that would provide a more enduring Green Belt.

**Test 3: Effective**

The proposed Green Belt boundaries will serve to inhibit the deliverability of the Plan by impeding the intention to unlock the further potential of York St John University and inhibiting the application of Policy ED5, which supports the expansion of the Sport Park at Northfield.

**Test 4: Consistent with national policy**

The proposed Green Belt boundaries will not facilitate the delivery of sustainable development in accordance with the policies in the Framework. The requirements paragraph 85 of the 2012 NPPF have not been correctly interpreted, and the Council has:-

- not ensured consistency with the Local Plan strategy for meeting identified requirements for sustainable development; and
- included land which it is unnecessary to keep permanently open
- failed to ensure that the Green Belt boundary will not need to be altered at the end of the development plan period



**8. (1) Please set out any 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 7 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 and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

The Green Belt boundary should utilise the well-defined and permanent boundary around the western edge of the land at Northfield (ref. YSJlp.nth, Appendix 6 of the representations).

**9. If your representation is seeking a change at question 8.(1)**

**9.(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 Inspectors by way of written representations.

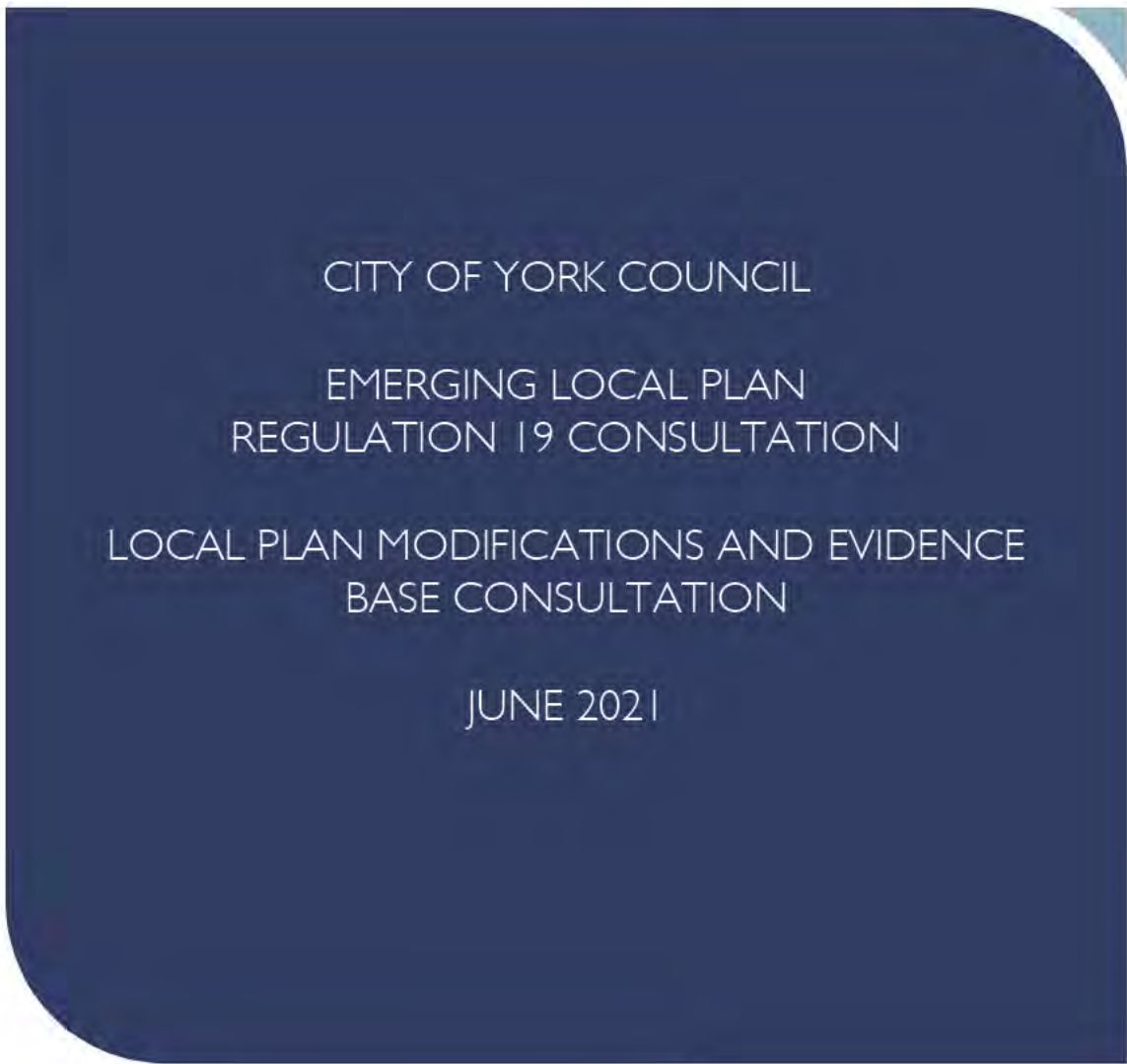
**9.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

This issue is of importance to York St John University, which should be able to utilise the land at Northfield to extend its strategy for sport and provide additional facilities at its Sport Park in line with Policy ED5.

**Please note:** the Inspectors 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.







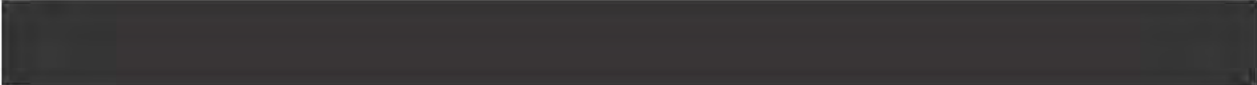
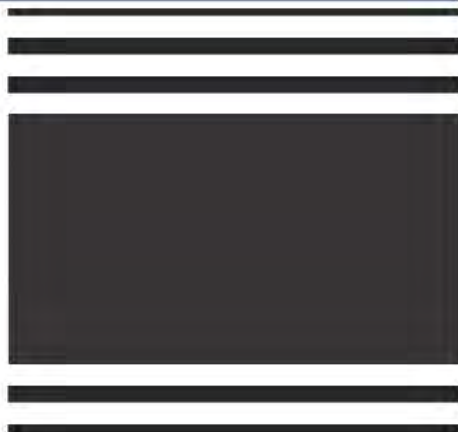
CITY OF YORK COUNCIL

EMERGING LOCAL PLAN  
REGULATION 19 CONSULTATION

LOCAL PLAN MODIFICATIONS AND EVIDENCE  
BASE CONSULTATION

JUNE 2021

Representations on behalf of  
York St John University  
in respect of  
Northfield, York St John University  
Sport Park, Haxby Road, YO31 8TA



## EXECUTIVE SUMMARY

- i. These representations are made on behalf of York St John University in relation to the Proposed Modifications and Evidence Base consultation on the emerging City of York Local Plan. They relate to the following documents:
  - EX/CYC/46: Key Diagram Update (January 2021)
  - EX/CYC/59: Topic Paper 1: Approach to Defining York's Green Belt: Addendum (January 2021)
  - EX/CYC/59d: Topic Paper 1: Green Belt Addendum (January 2021): Annex 3 - Inner Boundaries: Part 2, Section 5-6
  
- ii. The representations concern land at Northfield, part of the York St John University Sport Park at Haxby Road (Appendix 1), which is proposed by the Council to be included as Green Belt in the draft Local Plan. We conclude that:
  - the Emerging Local Plan is unsound in relation to aspects relevant to the York St John University Sport Park, specifically the inner green belt boundaries proposed around Northfield
  - Local Plan document EX/CYC/59 including Annex EX/CYC/59d, and the Key Diagram EX/CYC/46 are unsound
  - changes are required to utilise the well-defined and permanent boundary around the western edge of the land at Northfield (as illustrated in *plan ref. YS/Ip.nth, Appendix 6*)

We make no representations on Legal Compliance, or on the Duty to Cooperate.
  
- iii. The York St John University Sports Park comprises 24ha at sites on each side of Haxby Road, known as Mille Crux and Northfield. The Sport Park has been the focus of major development by the University, which has invested millions in transforming the site into a centre for sporting excellence.
  
- iv. The Proposals Map (North) for the draft Plan allocates the entire Sport Park as 'Existing University Campus' and 'Existing Openspace'. Draft Policy ED5 is explicit in supporting the use of Northfield for further expansion of the University, and includes outdoor and indoor sporting facilities, floodlighting, and car/cycle parking as appropriate uses at the site. The Plan proposes to include Northfield (and not Mille Crux) within the Green Belt.
  
- v. Our case is that designating Northfield as Green Belt is in clear conflict with policy ED5 and the wider Local Plan strategy objectives to meet the identified needs of the University and to contribute to making York a world class centre for education. It would seriously constrain the University's ability to expand its sporting provision through additional



development (e.g. indoor facilities) which would be supported by policy ED5 but would not accord with Green Belt policy, as this includes only provision of outdoor sport facilities in its exceptions to inappropriate development in Green Belt

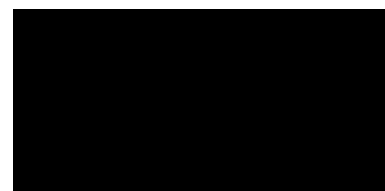
- vi. In document EX/CYC/59, the Council states that it has had “ongoing dialogue” with the University “to understand their growth needs up to and beyond the plan period”. Whilst we would dispute that any such dialogue has occurred, there is a clear recognition in the Council’s evidence base of the need to support additional facilities at the Sport Park, and that these are to be provided at Northfield. This aim would clearly be frustrated by the proposed Green Belt boundaries at the site.
- vii. Our case states that the Council’s approach to justifying the inner Green Belt boundaries, and assessing the contribution that Northfield makes to Green Belt purposes, is also fundamentally flawed. Contrary to the Council’s assessment, the Northfield site is patently not countryside. It is part of a busy sports campus which is used by students across a wide range of courses, by student sports clubs, and by the wider community. Our assessment shows that the land does not serve any of the three Green Belt purposes relevant to York, and there is no evidence to support the Council’s case that it should be kept permanently open.
- viii. **In this context, we consider that documents EX/CYC/46, EX/CYC/59, and EX/CYC/59d are not sound, as they do not meet the tests for soundness as required by paragraph 182 of the 2012 NPPF:**

**Test 1: Positively prepared:**

- ix. The proposed Green Belt boundaries, and inclusion of Northfield as Green Belt land, is inconsistent with the Local Plan strategy to meet objectively assessed development requirements by supporting the further expansion of the Sport Park at Northfield.

**Test 2: Justified**

- x. The proposed inclusion of Northfield within the Green Belt is not justified when considered against the Council’s own evidence. The land does not serve the three Green Belt purposes relevant to York, and there exist alternative options for robust boundaries that would provide a more enduring Green Belt.



**Test 3: Effective**

- xi. The proposed Green Belt boundaries will serve to inhibit the deliverability of the Plan by impeding the intention to unlock the further potential of York St John University and frustrating the application of Policy ED5, which supports the expansion of the Sport Park at Northfield.

**Test 4: Consistent with national policy**

- xii. The proposed Green Belt boundaries will not facilitate the delivery of sustainable development in accordance with the policies in the Framework. The requirements paragraph 85 of the 2012 NPPF have not been correctly interpreted, and the Council has:-
- not ensured consistency with the Local Plan strategy for meeting identified requirements for sustainable development; and
  - included land which it is unnecessary to keep permanently open
  - failed to ensure that the Green Belt boundary will not need to be altered at the end of the development plan period



CITY OF YORK LOCAL PLAN  
PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION (JUNE 2021)  
in compliance with Regulation 19 of the Town & Country Planning (Local Planning) (England)  
Regulations 2012

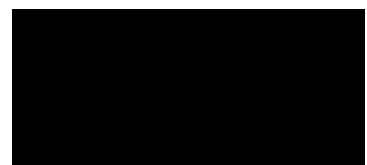
REPRESENTATIONS ON BEHALF OF YORK ST JOHN UNIVERSITY  
IN RESPECT OF LAND AT NORTHFIELD, HAXBY ROAD, YO31 8TA

CONTENTS

1. The Basis of the Representations
2. York St John University Sport Park
3. Draft Local Planning Policy Context
4. City Of York Council Green Belt Evidence
5. Assessment
6. Conclusion

APPENDICES

1. Land comprising York St John University Sport Park
2. Document EX/CYC/59d - Green Belt Inner Boundaries, Section 5
3. Document EX/CYC/59d - Inner Boundary: Section 5, Boundary 1 – 'Nestle Factory'
4. Document EX/CYC/59d - Inner Boundary: Section 5, Boundary 2 – 'Haxby Road'
5. Northfield - Aerial View and Photographs
6. Plan YSJJp.nth, showing alternative Green Belt boundary



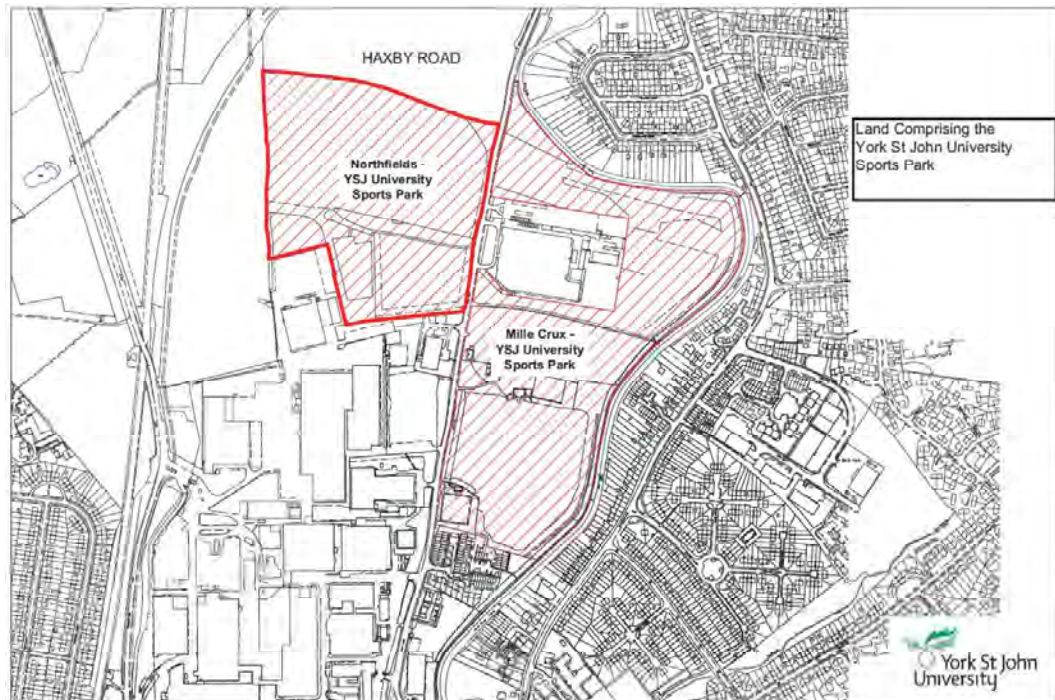
## 1.0 THE BASIS OF THE REPRESENTATIONS

- 1.1 These representations are made on behalf of York St John University in relation to the Proposed Modifications and Evidence Base consultation on the emerging City of York Local Plan. They concern the University's land at Northfield, located off Haxby Road in York.
- 1.2 The land at Northfield is located on the western side of Haxby Road, immediately to the north of the Nestle works complex. The site forms part of the wider York St John University Sport Park, as shown at Appendix 1.
- 1.3 The detailed Green Belt boundaries proposed by the Council include the Northfield site within the Green Belt. We consider that this designation is in clear conflict with the Council's Local Plan objective of contributing to making York a world class centre for education, and more specifically conflicts with draft Local Plan policy ED5 which supports the use of Northfield for further expansion of the University Sport Park.
- 1.4 The inclusion of Northfield within the Green Belt seriously constrains the University's ability to expand its sporting facilities and does not properly consider the need to meet this growth, as clearly recognised in policy ED5 and in the Council's Green Belt evidence. It is considered that the Council's approach in applying its own methodology to defining the Green Belt boundaries in relation to the Northfield site is also flawed.
- 1.5 In this context, we assert that the requirements of paragraph 85 of the 2012 NPPF have not been correctly interpreted, and that the Council has:-
- not ensured consistency with the Local Plan strategy for meeting identified requirements for sustainable development; and
  - included land which it is unnecessary to keep permanently open
  - failed to ensure that the Green Belt boundary will not need to be altered at the end of the development plan period
- 1.6 The representations relate to the following key evidence and supporting documents:
- EX/CYC/46: Key Diagram Update (January 2021)
  - EX/CYC/59: Topic Paper 1: Approach to Defining York's Green Belt: Addendum (January 2021)
  - EX/CYC/59d: Topic Paper 1: Green Belt Addendum (January 2021): Annex 3 - Inner Boundaries: Part 2, Sections 5-6

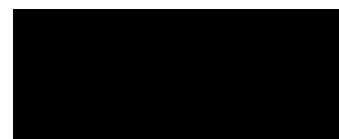


## 2.0 YORK ST JOHN UNIVERSITY SPORT PARK

- 2.1 The York St John University Sports Park is located at Haxby Road, approximately 1.5km to the north of York city centre and its main teaching campus at Lord Mayor's Walk.
- 2.2 It comprises a total of 24ha of land at sites on each side of Haxby Road, known as Mille Crux and Northfield. Mille Crux is located to the east of Haxby Road, and Northfield to the west.



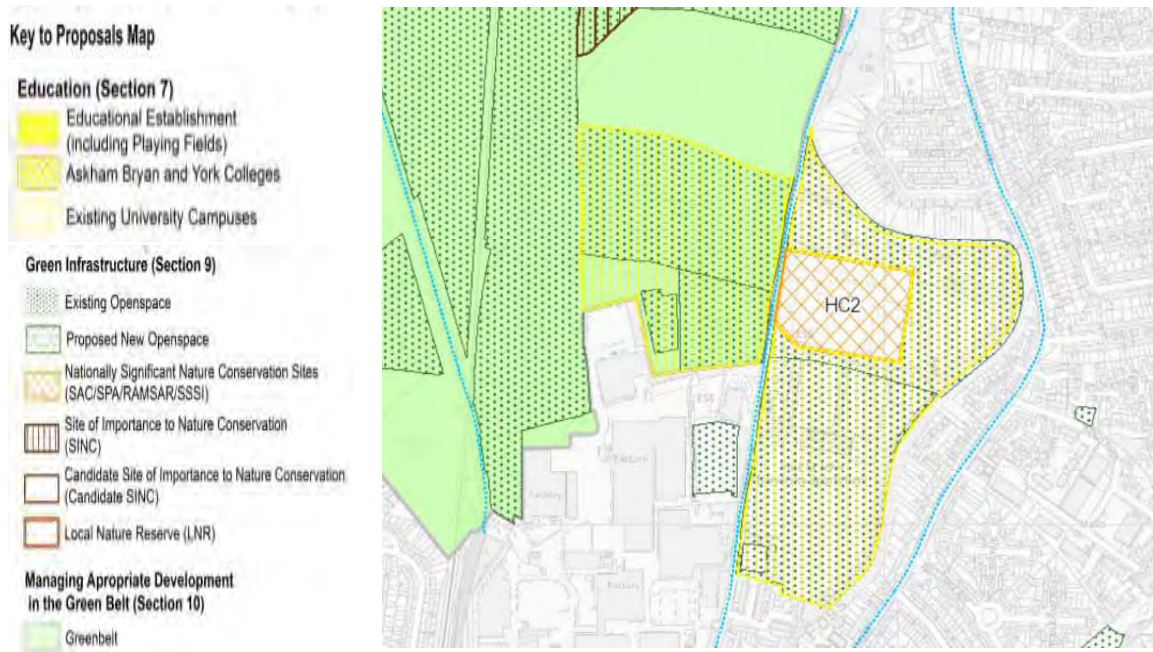
- 2.3 The 24ha site was acquired by York St John University from Nestlé in April 2012, when the land accommodated 3 full-size grass pitches, a neglected sports pavilion, and a 2.7ha area of allotments at Mille Crux, which then were predominantly vacant and in disrepair. It has since been the focus of major development by the University, which has invested millions in transforming the site into a centre for sporting excellence.
- 2.4 Mille Crux has been the subject of major development and now accommodates 3 full-size, floodlit artificial pitches; 3 floodlit outdoor tennis courts; a Hub Building with changing and teaching facilities; an indoor Sports Hall; an indoor tennis centre; an all-weather sprint track; a retained area of grass pitches; and a surfaced car/coach park.



2.5 The site at Northfield currently comprises two areas of grass pitches, which have been subject to drainage and levelling works to provide high quality playing fields comprising 2 football/rugby pitches, 3 football pitches, and up to 3 junior pitches. At present, Northfield does not accommodate any built facilities and the pitches have no floodlighting.

### 3.0 DRAFT LOCAL PLANNING POLICY CONTEXT

3.1 The Proposals Map (North) for the emerging Plan allocates the entirety of the University Sport Park (i.e. both Northfield and Mille Crux) as areas of 'Existing University Campuses' and as 'Existing Openspace'. Northfield, and not the Mille Crux site, has an additional designation as being within Green Belt land.



3.2 Planning policy relating to the further expansion of York St John University is addressed by Policy ED5 of the Publication Draft Local Plan. The policy and explanatory text read as follows:

**Policy ED5: York St. John University Further Expansion**

To support the continued success of York St. John University the following sites, as shown on the proposals map, are allocated for the uses below:

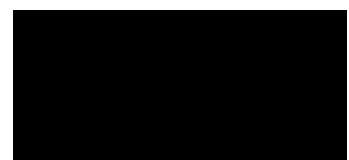
**Sport uses:**

- Land at Northfield, Haxby Road.

**Student Housing:**

- SH1: Land at Heworth Croft.

See also Policy H7, ENV2, D2 and D4.





#### **Sport Uses**

- 7.14 Northfield is laid out with grass rugby and football pitches, with players using changing facilities at Mille Crux. Northfield is allocated for sports uses in support of the University's development of its multi-million pound centre for sporting excellence via its major construction of buildings and facilities.
- 7.15 The allocation of the site reflects York St. John University's ambitions and supports its major investment in the Sports Park. It will assist in further extension of its strategy for sport that supports the teaching of a range of sports degrees but also for the general fitness and enjoyment of students and community teams who use the site.
- 7.16 Providing they comply with relevant policies in the rest of the plan, appropriate uses of the allocated sites may include:
- outdoor sports facilities, together with associated car and cycle parking and floodlighting;
  - appropriate indoor sports facilities; and
  - other outdoor recreational activity.
- 7.17 Proposals at the allocated sites which include floodlighting must take into account environmental quality issues in accordance with Policy EN2 which safeguards against excessive, inefficient and irresponsibly situated lighting, preserving and restoring 'dark skies' and limiting the impact from light pollution on local amenity, intrinsically dark landscapes, and nature conservation.

#### 4.0 CITY OF YORK COUNCIL GREEN BELT EVIDENCE

##### **EX/CYC/59: Topic Paper I Approach to Defining Green Belt Addendum (January 2021)**

- 4.1 The Green Belt boundaries around York are being defined (or established) for the first time. They are not being altered. In defining/establishing boundaries the Council must meet the identified requirement for sustainable development, i.e. it must allocate land to meet identified needs for housing, employment, education, leisure and other needs.
- 4.2 Section 4 of the Topic Paper Addendum summarises the Local Plan strategy for meeting identified requirements for sustainable development, and how the strategy to meet these requirements has been formulated.
- 4.3 In relation to 'Education Needs', Para. 4.46 states that the Local Plan has a role to help meet the vision to making York a world class centre for education "*by providing sufficient land to for educational facilities to reflect the aspiration and needs of local communities*".
- 4.4 Paragraph 4.51 states that the Council's work on the Local Plan to understand the expansion opportunities of higher and further education establishments "*has focused on discussions around recent trends in student numbers and the associated business expansion plans of these organisations as well as an understanding of the type of land uses required and their suitability to fit with the Green Belt*".

- 4.5 In relation to York St John University and its Sport Park, Paragraph 4.51 states:  
***“the need for additional land for sports uses to support the universities (sic) development of a centre for sporting excellence at Northfield, Haxby Road will be met within the main urban area”.***
- 4.6 The Addendum thus explicitly recognises a requirement for land to be allocated to meet an identified need for the expansion of the University’s Sport Park facilities at Northfield. At the same time, however, it contains the assumption that Northfield will be considered in the Local Plan as part of the urban area.
- 4.7 This assumption has not been carried through to the proposed Green Belt boundaries, nor is it reflected in the Key Diagram for the Local Plan (EX/CYC/46), which identifies the Mille Crux site as being within York’s main urban area but not Northfield.
- 4.8 Section 7 of the Addendum seeks to explain how the Council has taken account of the requirements of paragraph 84 of the (2012) NPPF which states that:  
*“when drawing up Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development”.*
- 4.9 At paragraph 7.5, the Addendum states that the Council has sought to ensure that a wide range of sites have been identified and assessed for their potential uses through the Site Selection process, and that it took a proactive approach to identifying potential sites for all types of development.
- 4.10 The University endorses the fact that this process has resulted in the allocation in the draft Plan of the Sport Park site as ‘Existing University Campuses’, and the inclusion of Policy ED5 supporting the further expansion of the Park. However, the Council’s approach to defining Green Belt boundaries has clearly not properly recognised the constraints which the Green Belt places on the University’s ability to expand the Northfield site in accordance with Policy ED5. These issues are further explained in Section 5 of these representations.
- 4.11 At Paragraph 10.28, the Addendum states that *“there has been ongoing dialogue between the Council and York St John University through iterative consultation on the Local Plan to understand their growth needs up to and beyond the plan period [CD013A]”.*
- 4.12 The CD013A document hereby referred is the Council’s Consultation Statement of May 2018, which states only that *“general support was received”* from the University regarding Policy ED4 of the Plan which relates to its Lord Mayor’s Walk Campus.



4.13 Importantly, the Addendum omits any reference to the subsequent representations made on the University’s behalf in July 2019 (outlined in the September 2019 Consultation Statement Addendum, EX/CYC/22). These representations set out the University’s objections to the proposed Green Belt designation for Northfield, and its concern over the conflict between the draft Plan’s support for the expansion of the Sport Park at Northfield and its, and sought that the site to be removed from Green Belt.

4.14 In referencing the “ongoing dialogue” that the Council asserts has taken place with the University, the Addendum at Paragraph 10.29 again emphasises its support for expansion of the Sport Park but repeats the assumption that this will be met on land outside the Green Belt:

*“Whilst there is a recognition of the need...for additional sports facilities, this has been met on identified sites within the urban area and is supported by policy ED5”.*

4.15 In context of the above, we consider that the proposed inclusion of the Northfield site within the Green Belt is not consistent with the Local Plan strategy and inhibits the explicitly stated intention to meet the University’s future development needs at the Sport Park.

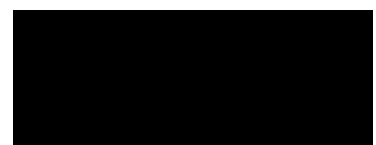
4.16 In addition, we believe there remain fundamental issues with the way the Green Belt methodology has been applied in the assessment of local detailed boundaries as set out in Annexes 2, 3 and 4 of the Addendum. In particular, we consider that the Council has taken an overly constrictive approach in its evaluation to the boundary sections. This seems intent more on serving a pre-established conclusion that boundaries must be drawn tightly around existing development limits, rather than providing a critical analysis of whether it is necessary to keep the land permanently open.

**EX/CYC/59d: Topic Paper 1: Green Belt Addendum (January 2021): Annex 3: Inner Boundaries, Part 2: Sections 5-6**

4.17 The TPI Addendum aims to clarify the methodology developed and applied to the establishment of York’s Green Belt boundaries in response to concerns raised by the Inspectors, including ensuring that the local assessment criteria have a clear and unequivocal connection to Green Belt purposes.

4.18 The Addendum confirms the following purposes as being appropriate to York’s Green Belt:

- Purpose 4 – Preserving the historic setting of York
- Purpose 1 – Preventing unrestricted sprawl
- Purpose 3 – Safeguarding the countryside from encroachment



It further states that the *primary purpose* of the Green Belt in York is to safeguard the setting and special character of York whilst delivering the spatial strategy.

4.19 The Northfield site falls within Section 5 of the proposed Inner Boundaries detailed in TPI Annex 3 (Appendix 2), with the relevant boundaries numbered 1 and 2 (Appendices 3 & 4). The Green Belt boundary proposed for this area is drawn tightly around the northern edge of the Nestle works site and before turning to the north along the eastern edge of Haxby Road.

4.20 The Council's detailed assessment for the Inner Boundaries 30-31 states that it is necessary to keep the Northfield site permanently open in relation to each of the three purposes identified as relevant to the York Green Belt. We address these below, starting with Purpose 4 in line with its primacy in the Local Plan strategy.

***Purpose 4 - To preserve the setting and special character of historic towns***

4.21 The two areas of pitches at Northfield are each enclosed by mature tree belts and hedgerows along the full extent of the northern, southern, and western boundaries. Boundaries along the eastern boundary with Haxby Road feature low level hedgerow planting and recent tree planting (ref. Aerial View and Photographs, Appendix 5).

4.22 Contrary to the Council's assessment in Annex 3, the two areas of Northfield do not comprise "open rural land". Nor do they form part of, or physically connect with the more open land including Bootham Stray, which lies to the west of the site and extends to the outer ring road between Clifton Moor and Earswick. The enclosed site therefore does not contribute to views of the Minster or the wider setting of the compact setting of the City which are available from distance through the open wedge of the Stray.

4.23 Given the above, we consider that the site does not contribute to the setting or understanding of the historic city, and there is no clear or compelling justification why it is necessary to keep this land permanently open to serve this Green Belt purpose. If Northfield were to be developed to include additional sporting facilities, as clearly supported by the Local Plan strategy, it is held that this would not have an adverse impact on the city's special historic character.

***Purpose 1 – To check the unrestricted sprawl of large built-up areas***

4.24 Development to support the use of the York St John Sport Park on a site proposed for allocation as an existing University campus cannot be considered as threatening urban sprawl. The Sport Park is a defined site with a specific use, within which Northfield is intended accommodate the further expansion of its facilities.



- 4.25 The Council assessment fails to take account of this context, and further fails to offer any clear evidence to support its conclusions that Northfield must be kept open to prevent unrestricted sprawl.
- 4.26 The Annex refers to the land being connected to the urban area, and lack of built structures, but neither of these factors would demonstrate why it is necessary for the land to be included in the Green Belt. The main justification that the land does serve Purpose 1 is provided in the statement that land adjacent to Boundaries 1 and 2 *“is unconstrained by built development or strong boundaries on more than one side, and therefore not contained or enclosed in a way that would prevent sprawl”*.
- 4.27 However, as shown in Appendix 5, the Northfield site comprises two areas which are both well contained by existing mature boundary planting. If this land were not to be included in Green Belt, these existing physical features would still provide robust and enduring boundaries that would be readily recognisable and equally serve to check unrestricted sprawl.

***Purpose 3 - To assist in safeguarding the countryside from encroachment***

- 4.28 The basic premise of the Council's assessment in terms of Purpose 3 is that the land outside of Boundaries 1 and 2 predominantly functions as part of the countryside and contributes to the character of the countryside through openness and views.
- 4.29 Again, these factors would not necessarily mean such must be kept permanently open. However, in any event, the Council's assertion that Northfield is part of the countryside is strongly challenged. The Northfield site is an active part of the York St John University Sport Park with its grass pitches widely-used by students and the local community. The site is allocated in the draft Local Plan as an existing University Campus and is intended to accommodate the further expansion of the Sport Park in the future. This may include changing and supporting facilities, indoor sport facilities, all-weather pitches, and lighting.
- 4.30 Further development at the Northfield site could not therefore be considered as encroachment into the countryside, and it is not necessary for the site to be kept open to serve Purpose 3. As stated above, the strong landscape boundaries around the Northfield site would offer more meaningful, permanent and enduring Green Belt boundaries that would ensure the Council could deliver its strategy to support the expansion of the Sport Park facilities and fulfil its requirement to meet the identified development needs of the University.

## 5.0 ASSESSMENT

- 5.1 Paragraph 85 of the NPPF states that, when defining Green Belt boundaries, local planning authorities should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development.
- 5.2 The Publication Draft Local Plan emphasises that the further education sector is of key importance to the economy, and states that the Plan will help unlock the further potential of York St John University through development and redevelopment at their current sites (para. 2.4). It acknowledges that the University excels in sport activity and recognises the major investment made in buildings and facilities to create a centre for sporting excellence at the Sport Park (para. 1.61).
- 5.3 The Plan and its evidence base clearly recognise that there is an identified requirement for further development at the Sport Park. The need for additional facilities is explicitly stated in the TPI Addendum (paras 4.51 and 10.29) and is preserved in the draft Plan through allocation of the Sport Park as an 'Existing University Campus' and by inclusion of Policy ED5 ("York St John Further Expansion") which supports meeting these development needs at Northfield.
- 5.4 The above represents positive support for the University's aspirations to further improve its facilities and enhance its reputation for sport, as expressed in the explanatory text for Policy ED5:  
*"The allocation of the site reflects York St. John University's ambitions and supports its major investment in the Sports Park. It will assist in further extension of its strategy for sport that supports the teaching of a range of sports degrees but also for the general fitness and enjoyment of students and community teams who use the site."*
- 5.5 However, the requirement to provide sufficient land for York's educational establishments has clearly not been taken into account in the Council's proposed Green Belt boundaries. This has led to the situation where on one hand the Local Plan evidence supports the allocation of the Northfield site as part of the York urban area, and on another states that the site should be included in the Green Belt and is not suitable for development.
- 5.6 We maintain that the proposed inclusion of the Northfield site within the Green Belt is not compatible with Policy ED5 and would be contrary to the clear and stated Local Plan strategy to support the development needs of the University.



- 5.7 The explanatory text for Policy ED5 states that *providing they comply with relevant policies in the rest of the plan*, appropriate uses of the Northfield site may include:
- outdoor sports facilities, together with associated car and cycle parking and floodlighting;
  - appropriate indoor sports facilities; and
  - other outdoor recreational activity.
- 5.8 The inclusion of the Northfield site within the Green Belt would therefore mean that all future development would necessarily also be assessed against the requirements of Local Plan Policy GBI. This would make the provision of “*appropriate indoor facilities*” - as nominally supported by draft Policy ED5 - much more difficult, given that such proposals would not be included in the exceptions to inappropriate development in Green Belt under draft Policy GBI, which covers only the provision of “*appropriate facilities for outdoor sport and outdoor recreation*”.
- 5.9 This is particularly important given the acknowledged under-provision of indoor sporting facilities in the City, and the opportunity that Northfield presents to assist in meeting this demand within an existing centre for sport at a sustainable location within comfortable walking and cycling distance of the city centre.
- 5.10 The provision of floodlighting, all-weather pitches, and parking facilities at Northfield, as also supported by Policy ED5, would all also become unduly problematic, given that these are usually considered urbanising features and not appropriate in Green Belt.
- 5.11 These issues would have an unnecessarily restrictive and detrimental effect on the long-term growth prospects of the University and its ability to improve facilities at its Sport Park in the future. It would make the planning process for bringing forward proposals for sporting facilities much more onerous, presenting greater risk to the University and having a detrimental impact on its ability to obtain funding.
- 5.12 We assert that this amounts to a fundamental failure to meet the requirements of NPPF Paragraph 185 which requires that when defining Green Belt boundaries, the Council should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development.
- 5.13 We also assert that the Council's detailed assessment of the Green Belt boundaries in relation to the Northfield site, as set out in Annex 3, are also fundamentally flawed. Contrary to the Council's assessment, the site is not open countryside, is not unenclosed land and does not form part of, or physically connect with areas of open land including

Bootham Stray. The site also does not contribute to views of the Minster or the wider historic setting or character of the City.

- 5.14 Our case, as set out in paragraphs 4.21 to 4.30 of these representations is the land at Northfield does not fulfil any of the three Green Belt purposes relevant to York. As such, it is clearly unnecessary to keep the land permanently open, and it should be excluded from the Green Belt in accordance with NPPF Paragraph 85.

## 6.0 CONCLUSION

- 6.1 It is our view that the Council's approach to defining the Green Belt is flawed, and that the inclusion of Northfields within the Green Belt conflicts with the Local Plan strategy to support the identified development needs of York St John University.

- 6.2 In this context, **we consider that documents EX/CYC/46, EX/CYC/59, and EX/CYC/59d are not sound**, as they do not meet the tests for soundness as required by paragraph 182 of the 2012 NPPF:

### **Test 1: Positively prepared:**

- 6.3 The proposed Green Belt boundaries, and inclusion of Northfield as Green Belt land, is inconsistent with the Local Plan strategy to meet objectively assessed development requirements by supporting the further expansion of the Sport Park at Northfield. It therefore cannot be judged to have been positively prepared.

### **Test 2: Justified**

- 6.4 The proposed Green Belt boundaries do not represent the most appropriate strategy, and the inclusion of Northfield within the Green Belt is not justified when considered against the Council's own evidence. The land does not serve the three Green Belt purposes relevant to York, and there exist alternative options for robust boundaries that would provide a more enduring Green Belt.

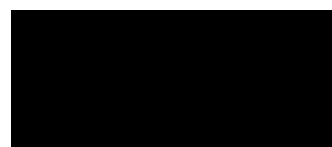
### **Test 3: Effective**

- 6.5 The proposed Green Belt boundaries will serve to inhibit the deliverability of the Plan by impeding the intention to unlock the further potential of York St John University and frustrating the application of Policy ED5, which supports the expansion of the Sport Park at Northfield.



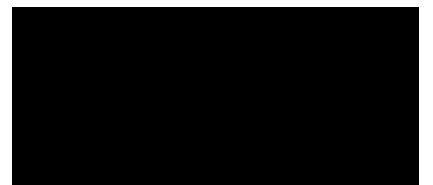
**Test 4: Consistent with national policy**

- 6.6 The proposed Green Belt boundaries will not facilitate the delivery of sustainable development in accordance with the policies in the Framework. The requirements paragraph 85 of the 2012 NPPF have not been correctly interpreted, and the Council has:-
- not ensured consistency with the Local Plan strategy for meeting identified requirements for sustainable development; and
  - included land which it is unnecessary to keep permanently open
  - failed to ensure that the Green Belt boundary will not need to be altered at the end of the development plan period
- 6.7 It is considered that the Green Belt boundaries at Northfields should be reconsidered, with a view to omitting the site from the Green Belt to ensure consistency with Local Plan objectives to support the use and development of the Sports Park.



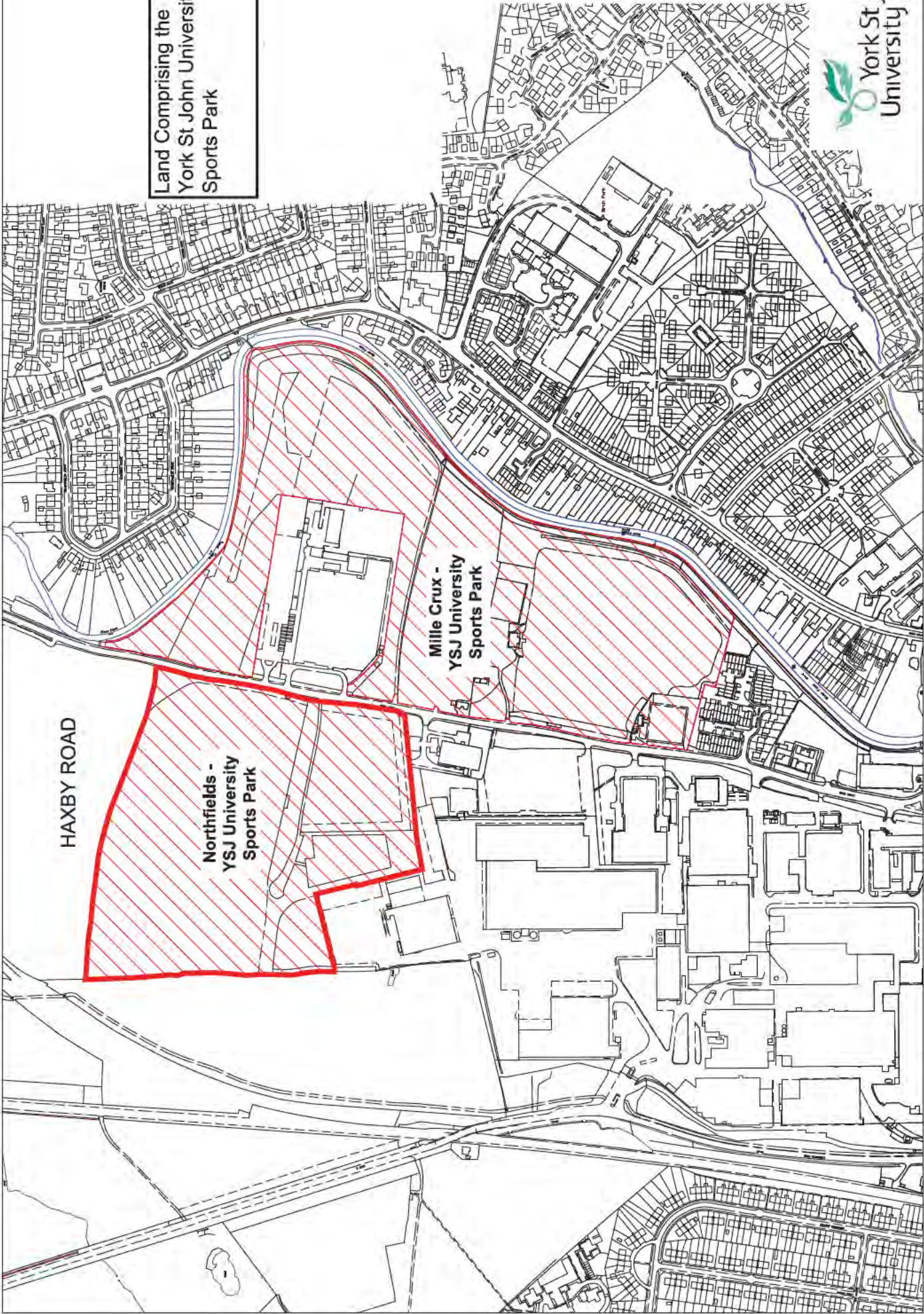
## APPENDIX 1

Land comprising York St John University Sport Park



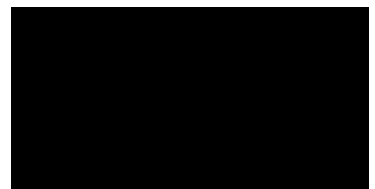


Land Comprising the  
York St John University  
Sports Park



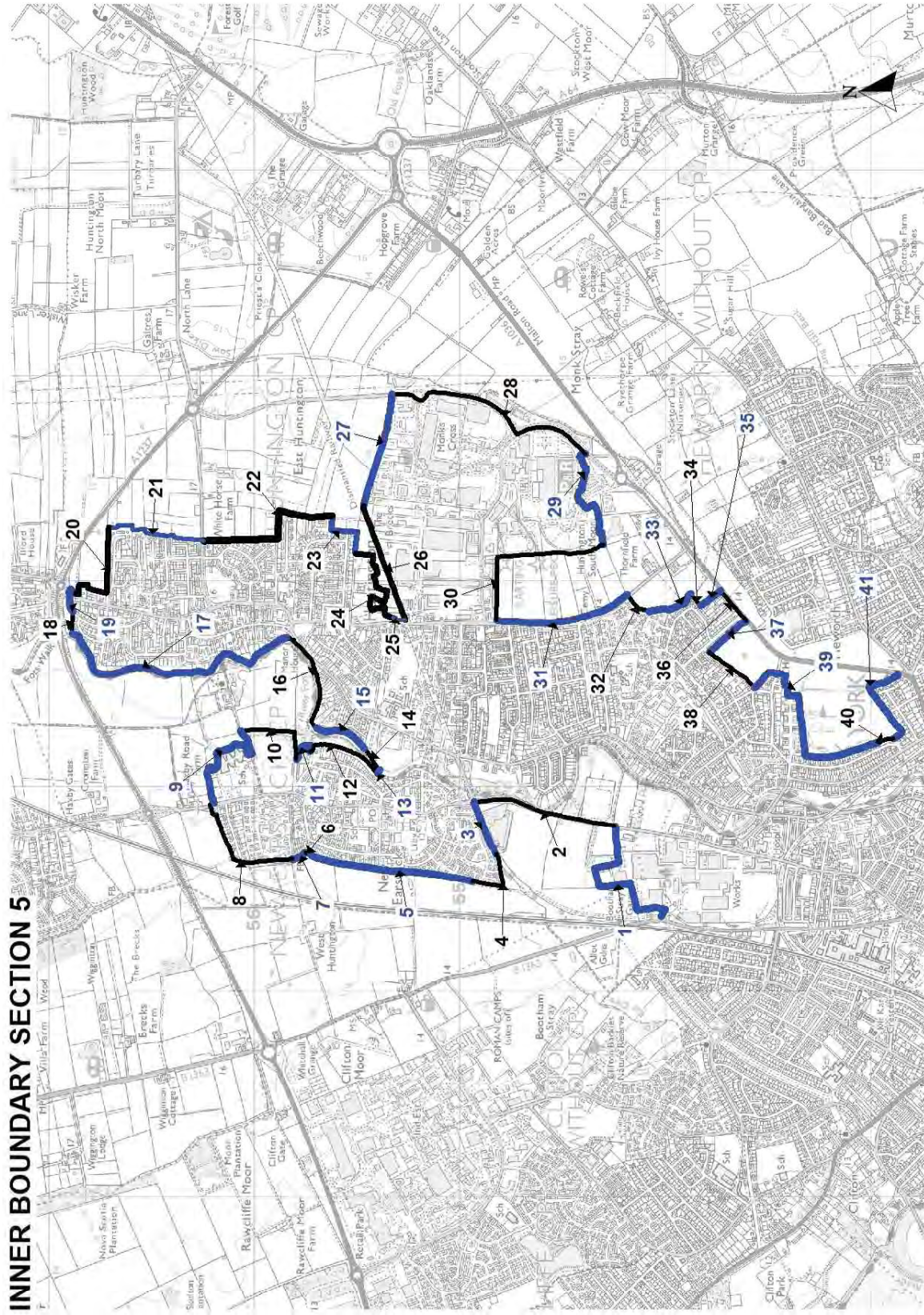
## APPENDIX 2

Document EX/CYC/59d - Green Belt Inner Boundaries, Section 5



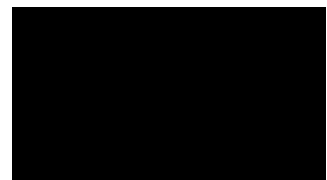


# INNER BOUNDARY SECTION 5



## APPENDIX 3

Document EX/CYC/59d - Inner Boundary: Section 5, Boundary 1 – 'Nestle Factory'





Section: **5** Boundary Name: **Nestle Factory**

Boundary: **1**

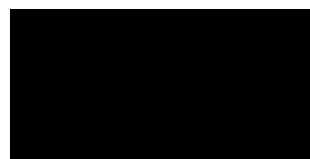
The boundary surrounds the Nestle Factory buildings until Haxby Road  
 This is a proposed modification from the boundary submitted in the City of York Local Plan (2018). Please see Annex 6 for further details.



Criterion 1 Compactness	1.1 Yes	Criterion 4 - Sprawl	4.1 Yes	Purpose 1 – IT IS NECESSARY TO KEEP LAND PERMANENTLY OPEN TO PREVENT UNRESTRICTED SPRAWL
	1.2 Yes		4.2 No	
	1.3 Yes		4.3 Yes	
Criterion 2 Landmark Monuments	2.1 Yes	Purpose 4 – IT IS NECESSARY TO KEEP LAND PERMANENTLY OPEN TO PRESERVE THE SETTING OF THE HISTORIC CITY	5.1 Yes	Purpose 3 – IT IS NECESSARY TO KEEP LAND PERMANENTLY OPEN TO SAFEGUARD THE COUNTRYSIDE FROM ENCROACHMENT
	2.2 Yes		5.2 Yes	
	2.3 No			
Criterion 3 Landscape and Setting	3.1 Yes	Criterion 5 - Encroachment	5.3 Yes	
	3.2 No			

## APPENDIX 4

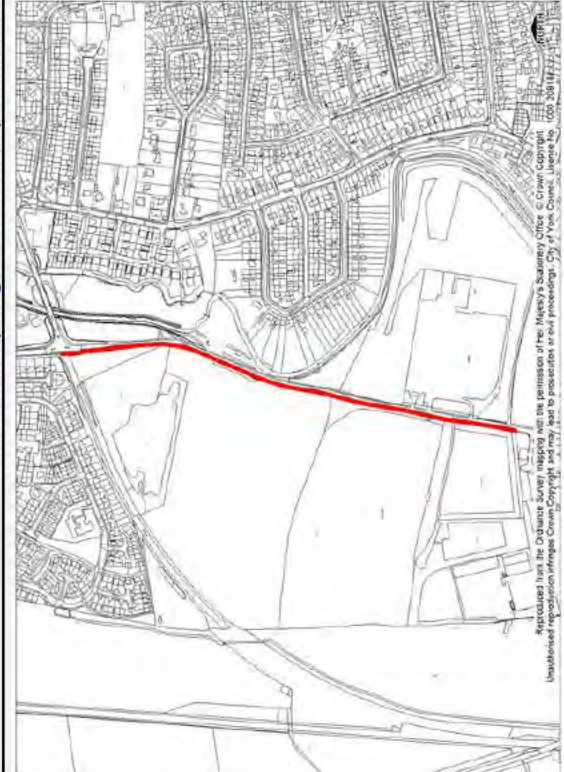
Document EX/CYC/59d - Inner Boundary: Section 5, Boundary 2 – 'Haxby Road'





Section: <b>5</b>	Boundary: <b>2</b>	Boundary Name: <b>Haxby Road</b>
----------------------	-----------------------	-------------------------------------

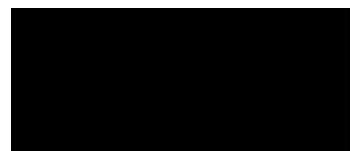
The boundary begins with Haxby Road and goes North until the crossroads at Link Road.



Criterion 1 Compactness	1.1	Yes	Criterion 4 - Sprawl	4.1	Yes	Purpose 1 - IT IS NECESSARY TO KEEP LAND PERMANENTLY OPEN TO PREVENT UNRESTRICTED SPRAWL
	1.1	Yes		4.2	No	
	1.3	Yes		4.3	Yes	
Criterion 2 Landmark Monuments	2.1	Yes	Criterion 5 - Encroachment	5.1	Yes	Purpose 3 - IT IS NECESSARY TO KEEP LAND PERMANENTLY OPEN TO SAFEGUARD THE COUNTRYSIDE FROM ENCROACHMENT
	2.2	Yes		5.2	Yes	
	2.3	No		5.2	Yes	
Criterion 3 Landscape and Setting	3.1	Yes	Purpose 4 - IT IS NECESSARY TO KEEP LAND PERMANENTLY OPEN TO PRESERVE THE SETTING OF THE HISTORIC CITY	5.3	Yes	
	3.2	No		5.3	Yes	

## APPENDIX 5

Northfield - Aerial View and Photographs







Northfield - Aerial View





Northfield – Playing Area South

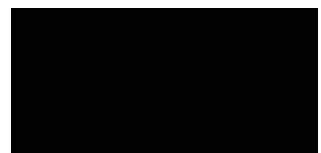


Northfield – Playing Area North



## APPENDIX 6

Plan YSJlp.nth, showing alternative Green Belt boundary

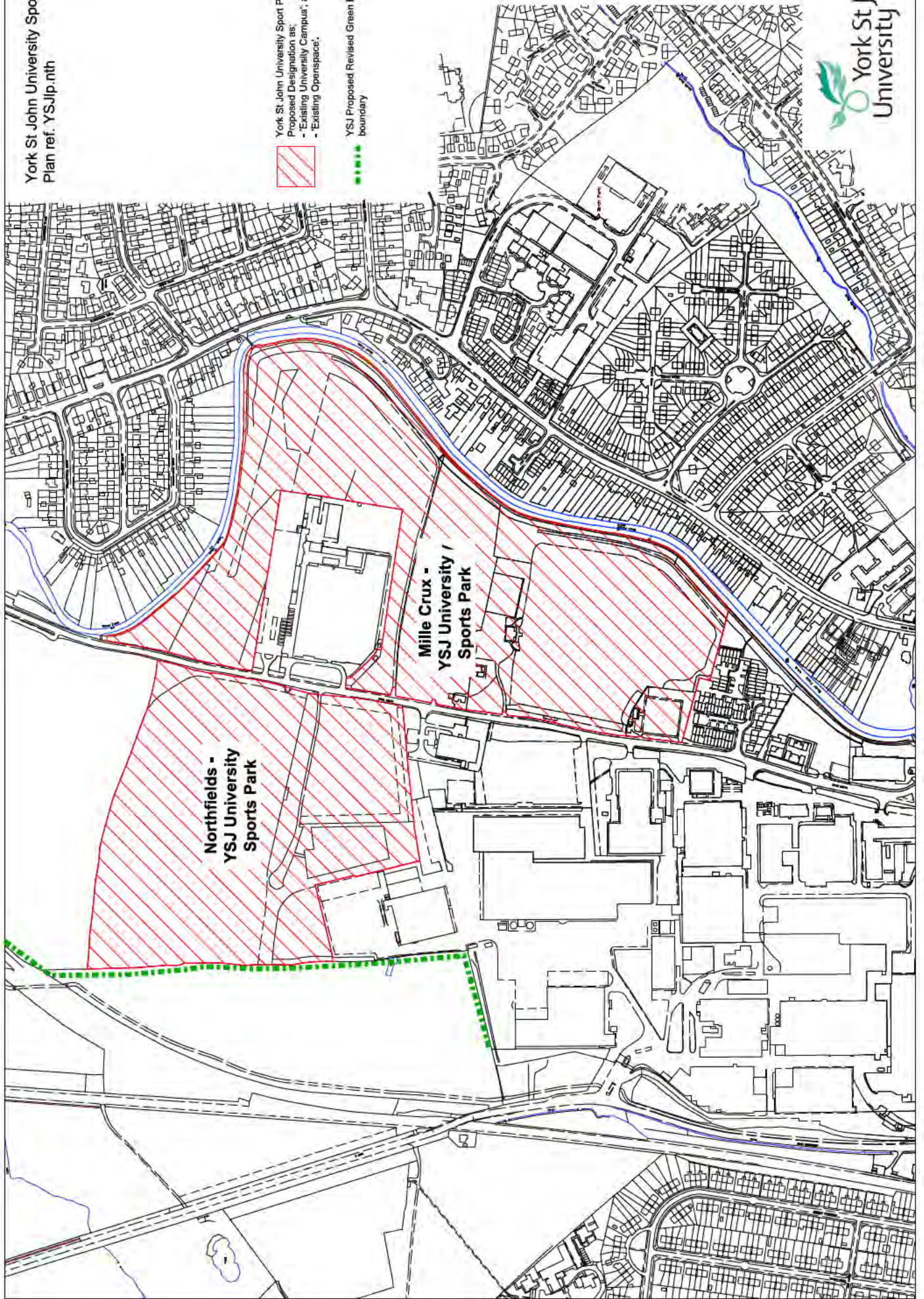




York St John University Sport Park  
Proposed Designation as:  
- Existing University Campus; and  
- Existing Openspace.



YSJ Proposed Revised Green Belt  
boundary





**From:** [REDACTED]  
**Sent:** 07 July 2021 09:36  
**To:** localplan@york.gov.uk  
**Subject:** Representations on behalf of York St John University  
**Attachments:** Local Plan Modification & Evidence Base Consultation - Representations on behalf of York St John University; Local Plan Proposed Modifications Consultation Response Form 2021.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Representations on behalf of York St John University

We have noticed that the pdf version of the Response Form submitted yesterday evening cut off the final line of text from the second page of Section 7.(3).

The attached word version of Response Form includes the text in full, and should replace the pdf version.

The representations document ref. ysjulp2107 is unchanged.

Kind regards

**Roberts, John**

---

**From:** [REDACTED]  
**Sent:** 06 July 2021 20:13  
**To:** localplan@york.gov.uk  
**Subject:** Local Plan Modification & Evidence Base Consultation - Representations on behalf of York St John University  
**Attachments:** Local Plan Proposed Modifications Consultation Response Form 2021.pdf; YSJ Northfield Reps ysjulp2107.pdf

Please find attached representations submitted on behalf of York St John University.

Kind regards

[REDACTED]



# City of York Local Plan Proposed Modifications Consultation Response Form 25 May – 7 July 2021

OFFICE USE ONLY:

ID reference:

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

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors 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 A carefully before completing the form. Please ensure you sign the form on page 2.**

**Please fill in a separate Part C for each issue/representation you wish to make.** Failure to fully complete Part C of this form may result in your representation being returned. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

## Part A - How we will use your Personal Information

When we use your personal data, CYC complies with data protection legislation and is the registered 'Controller'. Our data protection notification is registered with the Information Commissioner's Office (ICO) – reference **Z5809563**.

**What information will be collected:** The consultation only looks at the specific proposed modifications and specific evidence base documents and not other aspects of the plan. The representations should therefore focus only on matters pertaining to those main modifications and documents being consulted upon. We are collecting personal details, including your name and address, alongside your opinions and thoughts.

**What will we do with the information:** We are using the information you give us with your consent. You can withdraw your consent at any time by contacting the Forward Planning team at [localplan@york.gov.uk](mailto:localplan@york.gov.uk) or 01904 552255.

The information we collect will be provided to the Planning Inspectors, together with a summary of the main issues raised during the representations period and considered as part of the Local Plan examination<sup>1</sup>. Response will be made available to view as part of the Examination process and 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. We will protect it and make sure nobody has access to it who shouldn't and we will not keep it for longer than is necessary.

We will not use the information for any other purpose than set out in this privacy notice and will not disclose to a third party i.e. other companies or individuals, unless we are required to do so by law for the prevention of crime and detection of fraud, or, in some circumstances, when we feel that you or others are at risk.

You can find out more about how the City of York Council uses your information at <https://www.york.gov.uk/privacy>

We will also ask you if you want to take part in future consultations on planning policy matters including Supplementary Planning Documents and Neighbourhood Plans.

**Storage of information:** We will keep the information you give us in CYC's secure network drive and make sure it can only be accessed by authorised staff.

**How long will we keep the information:** The response you submit relating to this Local Plan consultation can only cease to be made available 6 weeks after the date of the formal adoption of the Plan<sup>2</sup>. When we no longer have a need to keep your information, we will securely and confidentially destroy it. Where required or appropriate, at the end of the retention period we will pass onto the City Archives any relevant information.

**Further processing:** If we wish to use your personal information for a new purpose, not covered by this Privacy Notice, we will provide you with a new notice explaining the purpose prior to commencing the processing and the processing conditions. Where and whenever necessary, we will seek your consent prior to the new processing.

**Your rights:** To find out about your rights under data protection law, you can go to the Information Commissioners Office (ICO): <https://ico.org.uk/for-the-public/>

You can also find information about your rights at <https://www.york.gov.uk/privacy>

If you have any questions about this privacy notice, want to exercise your rights, or if you have a complaint about how your information has been used, please contact us at [information.governance@york.gov.uk](mailto:information.governance@york.gov.uk) on 01904 554145 or write to: Data Protection Officer, City of York Council, West Offices, Station Rise, York YO1 6GA.

**1. Please tick the box to confirm you have read and understood the privacy notice and consent to your information being used as set out in the privacy notice**

**2. Please tick the box to confirm we can contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents.**

Signature

Date



## Part B - Personal Details

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

3. Personal Details		4. Agent's Details (if applicable)
[REDACTED]		
[REDACTED]		
[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]
[REDACTED]		[REDACTED]
[REDACTED]		[REDACTED]
[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]
[REDACTED]		[REDACTED]

# Guidance note

## Where do I send my completed form?

Please return the completed form **by Wednesday 7 July 2021, 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](mailto:localplan@york.gov.uk)

You can also complete the form online at:

[www.york.gov.uk/form/LocalPlanConsultation](http://www.york.gov.uk/form/LocalPlanConsultation).

## What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and supporting evidence base, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018 and following the phase 1 hearing sessions in December 2019 as part of the Examination into the Plan. You can make comments on any of the proposed modifications and a number of evidence base documents as set out below. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

- City of York Local Plan Composite Modifications Schedule (May 2021) [[EX/CYC/58](#)] and City of York Local Plan Publication Draft (February 2018) [[CD001](#)] **to be read alongside the comprehensive schedule of proposed modifications only**
- York Economic Outlook (December 2019) Oxford Economics [[EX/CYC/29](#)]
- CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return (December 2019) [[EX/CYC/32](#)]
- Affordable Housing Note Final (February 2020) [[EX/CYC/36](#)]
- Audit Trail of Sites 35-100 Hectares (June 2020) [[EX/CYC/37](#)]
- Joint Position Statement between CYC and Selby DC Housing Market Area (April 2020) [[EX/CYC/38](#)]
- G L Hearn Housing Needs Update (September 2020) [[EX/CYC/43a](#)]
- Habitat Regulation Assessment (HRA) (October 2020) Waterman Infrastructure and Environment Limited [[EX/CYC/45](#)] and Appendices (October 2020) [[EX/CYC/45a](#)]
- Key Diagram Update (January 2021) [[EX/CYC/46](#)]
- Statement of Community Involvement Update (November 2020) [[EX/CYC/49](#)]
- SHLAA Update (April 2021) [[EX/CYC/56](#)]
- CYC SuDs Guidance for Developers (August 2018) [[EX/CYC/57](#)]
- Topic Paper TP1: Approach to defining York's Green Belt (Addendum) (January 2021) [[EX/CYC/59](#)]
  - Annex 1: Evidence Base (January 2021) [[EX/CYC/59a](#)]
  - Annex 2: Outer Boundary (February 2021) [[EX/CYC/59b](#)]
  - Annex 3: Inner Boundary (Part: 1 March 2021 [[EX/CYC/59c](#)], Part 2: April 2021 [[EX/CYC/59d](#)] and Part 3 April 2021) [[EX/CYC/59e](#)]
  - Annex 4: Other Urban Areas within the General Extent (April 2021) [[EX/CYC/59f](#)]
  - Annex 5: Freestanding Sites (March 2021) [[EX/CYC/59g](#)]
  - Annex 6: Proposed Modifications Summary (April 2021) [[EX/CYC/59h](#)]
  - Annex 7: Housing Supply Update (April 2021) [[EX/CYC/59i](#)] and Trajectory Summary (April 2021) [[EX/CYC/59j](#)]
- City of York Council Strategic Flood Risk Assessment (SFRA) Level 1 Report [[EX/CYC/60](#)]
- Sustainability Appraisal of the Composite Modifications Schedule (April 2021) [[EX/CYC/61](#)]



### **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 Inspectors 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 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.

You can use our online consultation form via [www.york.gov.uk/form/LocalPlanConsultation](http://www.york.gov.uk/form/LocalPlanConsultation) or send back your response via email to [localplan@york.gov.uk](mailto:localplan@york.gov.uk). **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response. We also need your confirmation that you consent to our Privacy Policy (Part A of this form).**

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

Yes, you can. Where there are groups who share a common view, 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 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 B of this form the group you are representing.

### **Do I need to attend the Public Examination?**

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. You can indicate if 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 Inspectors will use their 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 Consultation documents?**

Copies of the consultation documents are available to view on the council's website at <https://www.york.gov.uk/LocalPlanConsultation>.

In line with the current pandemic, we are also making the documents available for inspection by appointment only at City of York Council Offices, if open in line with the Government's Coronavirus restrictions. To make an appointment to view the documents, please contact the Forward Planning team via [localplan@york.gov.uk](mailto:localplan@york.gov.uk) or on 01904 552255.

Documents are also available to view electronically via Libraries, if open in line with Government Coronavirus restrictions. See our [Statement of Representations Procedure](#) for further information.

# Part C -Your Representation

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



## 5. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

EX/CYC/59; EX/CYC/59d; EX/CYC/46

Document:

TP1 Addendum; TP1 Addendum Annex 3; Key Diagram Update

Page Number:

Various

## 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](http://www.york.gov.uk/localplan) or sent by request.

## 6. Based on the Proposed Modification or new evidence document:

### 6.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

### 6.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

### 6.(3) Please justify your answer to question 6.(1) and 6.(2)

We make no representations on Legal Compliance, or on the Duty to Cooperate.

## What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

## 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

**7. Based on the Proposed Modification or new evidence document:**

**7.(1) Do you consider that the Local Plan is Sound?**

Yes  No

**7.(2) Please tell us which tests of soundness are applicable to 7.(1):**

(tick all that apply)

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

**7.(3) Please justify your answers to questions 7.(1) and 7.(2)**

Please use extra sheets if necessary

Designating Northfield as Green Belt is in conflict with draft policy ED5 and the wider Local Plan strategy objectives to meet the identified needs of York St John University. It would seriously constrain the University's ability to expand its sporting provision through additional development (e.g. indoor facilities) which would be supported by policy ED5 but would not accord with Green Belt policy, which covers only provision of outdoor sport facilities in its exceptions to inappropriate development in Green Belt

There is a clear recognition in the Council's evidence base of the need to support additional facilities at the Sport Park, and that these are to be provided at Northfield. This aim would clearly be frustrated by the proposed Green Belt boundaries at the site.

The Council's approach to justifying inner Green Belt boundaries, and assessing the contribution Northfield makes to Green Belt purposes, is fundamentally flawed. Contrary to the CYC assessment, the Northfield site is not countryside. It is part of a busy sports campus which is used by students across a wide range of courses, by student sports clubs, and by the wider community. The land does not serve any of the 3 Green Belt purposes relevant to York, and there is no evidence to support the Council's case that it should be kept permanently open.

Test 1: Positively prepared:

The proposed Green Belt boundaries, and inclusion of Northfield as Green Belt land, is

**Test 2: Justified**

The proposed inclusion of Northfield within the Green Belt is not justified when considered against the Council's own evidence. The land does serve the three Green Belt purposes relevant to York, and there exist alternative options for robust boundaries that would provide a more enduring Green Belt.

**Test 3: Effective**

The proposed Green Belt boundaries will serve to inhibit the deliverability of the Plan by impeding the intention to unlock the further potential of York St John University and inhibiting the application of Policy ED5, which supports the expansion of the Sport Park at Northfield.

**Test 4: Consistent with national policy**

The proposed Green Belt boundaries will not facilitate the delivery of sustainable development in accordance with the policies in the Framework. The requirements paragraph 85 of the 2012 NPPF have not been correctly interpreted, and the Council has:-

- not ensured consistency with the Local Plan strategy for meeting identified requirements for sustainable development; and
- included land which it is unnecessary to keep permanently open
- failed to ensure that the Green Belt boundary will not need to be altered at the end of the development plan period



**8. (1) Please set out any 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 7 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 and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

The Green Belt boundary should utilise the well-defined and permanent boundary around the western edge of the land at Northfield (ref. YS1lp.nth, Appendix 6 of the representations).

**9. If your representation is seeking a change at question 8.(1)**

**9.(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 Inspectors by way of written representations.

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

This issue is of importance to York St John University, which should be able to utilise the land at Northfield to extend its strategy for sport and provide additional facilities at its Sport Park in line with Policy ED5.

**Please note:** the Inspectors 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.





**From:** [REDACTED]  
**Sent:** 25 May 2021 17:24  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, INDIVIDUAL - reference: 194668

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: no

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent my own views

---

## Your personal information

**Title:** Mr

**Name:** John Owen-Barnett

**Email address:** [REDACTED]

**Telephone:** [REDACTED]

**Address:** [REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Housing Needs Update September 2020 (EX/CYC/43a)

---

## Your comments: Legal Compliance of the document

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

**Please justify why you consider the document to be legally compliant:** Evidence based.

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** This procedure.

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** It has taken so long to produce.

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** None.

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** No, I do not wish to participate at hearings sessions

**If you do not wish to participate at hearing sessions, please state why:** Having been to previous meetings I realise that the process can raise my blood pressure.

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

---



**From:** [REDACTED]  
**Sent:** 26 May 2021 09:25  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, INDIVIDUAL - reference: 194749

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent my own views

---

## Your personal information

**Title:** Miss

**Name:** Pauline ENSOR

**Email address:** [REDACTED]

**Telephone:** [REDACTED]

**Address:** [REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Housing Needs Update September 2020 (EX/CYC/43a)

---

## Your comments: Legal Compliance of the document

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

**Please justify why you consider the document to be legally compliant:** Based on a positive strategy and effective

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Local authorities giving full consideration of sustained development of land for housing with consultation of such bodies as Environment Agency

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** prepared in correct manner to achieve sustainable development. In agreement with national policy

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:**

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:**

**If you do not wish to participate at hearing sessions, please state why:**

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

---

**From:** [REDACTED]  
**Sent:** 26 May 2021 14:59  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, INDIVIDUAL - reference: 194857

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent my own views

---

## Your personal information

**Title:** Mr

**Name:** Peter Rollings

**Email address:** [REDACTED]

**Telephone:** [REDACTED]

**Address:** [REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Green Belt Addendum January 2021 Annex 3 Inner Boundary Part 1 Sections 1 to 4 (EX/CYC/59c)

---

## Your comments: Legal Compliance of the document

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



**Please justify why you consider the document to be legally compliant:** All legal requirements appear to be completely followed

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** reading the process followed confirms this

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** The document has been positively prepared involving exhaustive consultation with the Local community community. In particular the proposed Green Belt boundaries in the parish of Rufforth with Knapton are consistent with those shown in our Neighbourhood Plan which was adopted in 2018 following a referendum with 93% in favour. This paper explains in detail the reasoning behind the boundary definitions and has the full support of local residents as required under the Localism Act 2011 Furthermore it is consistent with National policy

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:**

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:**

**If you do not wish to participate at hearing sessions, please state why:**

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**



**Sent:** 28 May 2021 13:33  
**To:** localplan@york.gov.uk  
**Cc:** [REDACTED]  
**Subject:** City of York Local Plan Proposed Modifications and Evidence Based Consultation (2021)

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

**RE: Draft City of York Local Plan Proposed Modifications and Evidence Base Consultation (2021)**

Thank you for the opportunity to comment on the Proposed Modifications (2021) to the City of York Local Plan and supporting evidence base.

The Board reviewed the following documents:

- EX/CYC/58: Composite Modifications Schedule April 2021
- EX/CYC/57: CYC Sustainable Drainage Systems Guidance for Developers (August 2018)
- EX/CYC/61: Strategic Flood Risk Assessment

We note that paragraph 1 of Section 4.2 of the CYC Sustainable Drainage Systems Guidance for Developers (August 2018) states:-

***“Greenfield sites are to limit the discharge rate to the pre developed run off rate. The pre development run off rate should be calculated using either IOH 124 or FEH methods (depending on catchment size).”***

The Board would however usually request that only the rate of 1.4 litres per second per hectare is used for greenfield sites and we do not usually allow the IOH 124 or FEH methods.

Kind regards,

[REDACTED]

[REDACTED]



Airedale Drainage Commissioners  
Ainsty (2008) Internal Drainage Board  
Beverley & North Holderness Internal Drainage Board  
Foss (2008) Internal Drainage Board  
Ouse & Derwent Internal Drainage Board


**Address:** Derwent House | Crockey Hill | York | YO19 4SR

**E-mail:** [planning@yorkconsort.gov.uk](mailto:planning@yorkconsort.gov.uk)

**Website:** <http://www.yorkconsort.gov.uk>

**Working Hours:** Monday to Thursday: 8.30am to 5pm | Friday: 8.30am to 2pm



 *please don't print this e-mail unless you really need to*

This e-mail, together with any attachments, is confidential and is intended solely for the individual to whom it is addressed. The views expressed are that of the author and do not constitute or imply the endorsement or recommendation of the Drainage Board. If you are not the intended recipient please inform the sender immediately.

Whilst the Board does run anti-virus software, you are solely responsible for ensuring that any e-mail or attachment you receive is virus free and the Board disclaims any liability for any damage you suffer as a consequence of receiving any virus.

**From:** [REDACTED]  
**Sent:** 11 June 2021 07:41  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, INDIVIDUAL - reference: 198237

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent my own views

---

## Your personal information

**Title:** Mrs

**Name:** Jacqueline Ridley

**Email address:** [REDACTED]

**Telephone:** [REDACTED]

**Address:** [REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Composite Modifications Schedule April 2021 (EX/CYC/58)

---

## Your comments: Legal Compliance of the document

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

**Please justify why you consider the document to be legally compliant:** The City Council have followed the appropriate process

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** The City Council have provided the appropriate documentation

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** The City Council have provided evidence to support the key principles

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** None

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** No, I do not wish to participate at hearings sessions

**If you do not wish to participate at hearing sessions, please state why:** I am happy to provide my comments by email

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

---



**From:** localplan@york.gov.uk  
**Sent:** 13 August 2021 08:22  
**To:** localplan@york.gov.uk  
**Subject:** FW: The May 2021 modifications to the plan. My comments

-----Original Message-----

**From:** [redacted] >  
**Sent:** 25 May 2021 17:57  
**To:** localplan@york.gov.uk  
**Subject:** The May 2021 modifications to the plan. My comments

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Planning Office,

Can you please take action to add these comments to those being collated for the Consultation Period that commenced to day about the latest modifications to the plan.

I am delighted that:

- 1. The Local Plan will now cover the period up to 2032/2033. This is a very sensible timeframe
- 2. I fully support the ability for the new Green Belt to remain in place until 2038;
- 3. I fully support the proposals to define the Green Belt for the City of York and I fully support the areas of the Green Belt;
- 4. I think, it is extremely sensible to have a policy that ' makes best use of previously developed land' for future developments and I fully support these proposals;
- 5. I support the proposals to remove the large development in Strensall as it is too close to the Strensall Common environment.

Please confirm that my comments have been added to those being collated by the Council.

Jacqueline Ridley



Sent from my iPad

**From:** [REDACTED]  
**Sent:** 14 June 2021 15:33  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, INDIVIDUAL - reference: 198730

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent my own views

---

## Your personal information

**Title:** Mr

**Name:** John Pilgrim

**Email address:** [REDACTED]

**Telephone:** [REDACTED]

**Address:** [REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Composite Modifications Schedule April 2021 (EX/CYC/58)

---

## Your comments: Legal Compliance of the document

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

**Please justify why you consider the document to be legally compliant:** The document has met the appropriate tests of soundness.

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** The document has met all the necessary requirements in relation to Duty to Cooperate.

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** The document is sound.

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** I would like to register my strong support for the proposed changes (PM101) to the green belt in the vicinity of Strensall Barracks. I believe the proposed changes will help to protect Strensall Common and the SAC from overuse and degradation. The remainder of the green belt boundary should remain as submitted, and careful consideration should be given to the impact future development may have on Strensall Common, including the impact from, medium scale, infill developments.

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** No, I do not wish to participate at hearings sessions

**If you do not wish to participate at hearing sessions, please state why:** Time constraints.

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**





**From:** [REDACTED]  
**Sent:** 20 June 2021 18:39  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, INDIVIDUAL - reference: 200123

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent my own views

---

## Your personal information

**Title:** Mrs

**Name:** Amanda Garnett

**Email address:** [REDACTED]

**Telephone:** [REDACTED]

**Address:** [REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Green Belt Addendum January 2021 Annex 4 Other Developed Areas (EX/CYC/59f)

---

## Your comments: Legal Compliance of the document

Do you consider the document to be legally compliant?: No, I do not consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:**

**Please justify why you do not consider the document to be legally compliant:** The documentation has not been circulated for public comments of impacted residents. I was only aware due to it being drawn to my attention by a neighbouring resident that has taken the time to inform people who are directly impacted on the boundary lines. However this is a small proportion of people of a much larger community who are not likely to be aware of the proposals and therefore will not have the opportunity to comment.

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** No, I do not consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:**

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:** As with the legal compliance the duty to cooperate states “engage constructively, actively and on an ongoing basis...” I do not believe that these proposals have been actively communicated.

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** I believe that the majority of documentation has been created with the key tests considered: Positively prepared, justified and effective. However I am not convinced that many of the proposals are consistent with national policy. I believe the national policy to be that green belt land should only be considered for building if there is an absence of more suitable land.

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** The document should be circulated via local council communications. There is also a distinct lack of clarity. The information contained within the document is not easily interpreted into a clear strategy. A significant proportion of people would not easily understand the content which makes it seem underhand and that people are not being given the opportunity to comment on something that will directly impact them.

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** No, I do not wish to participate at hearings sessions



**If you do not wish to participate at hearing sessions, please state why:** I am not politically minded and would be out of my depth at this.

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

---

**From:** [REDACTED]  
**Sent:** 25 June 2021 14:23  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 203014

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Green Belt Addendum January 2021 Annex 3 Inner Boundary Part 1 Sections 1 to 4 (EX/CYC/59c)

---

## Your comments: Legal Compliance of the document

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

**Please justify why you consider the document to be legally compliant:** Has been to our knowledge in accordance with all regulatory requirements

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** In as far as we are aware the Duty to Cooperate has been fulfilled

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** In our view the document is sound having been positively prepared in great detail and in line with national policies. Equally it has been the subject of extensive consultation and has received the overwhelming support of residents. Moreover the green belt boundaries detailed are consistent with those set out in the Rufforth with Knapton Neighbourhood plan which was adopted in 2018 following a referendum in the Parish at which 93% voted in support, further evidence of the local community's support for the boundaries set out in this document. It results in sensible balance between meeting local housing needs and preserving the rural character of the Parish

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** None

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** No, I do not wish to participate at hearings sessions

**If you do not wish to participate at hearing sessions, please state why:** We are not proposing any changes to the documents but would be happy to speak in support.

---



## Supporting documentation

Please provide any documents which support the comments made as part of this submission:

---

**From:** [REDACTED]  
**Sent:** 25 June 2021 14:36  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 203020

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Approach to defining Green Belt Addendum January 2021 (EX/CYC/59)

---

## Your comments: Legal Compliance of the document

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

**Please justify why you consider the document to be legally compliant:** We have read the paper in detail and the approach appears to meet all legal requirements

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** We believe that the Duty to Cooperate has been fulfilled

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** We believe that the document has been prepared in great detail and that the approach to the Green Belt is both logical and in compliance with national policy . It gives due weight to the importance of the Green Belt in protecting the historic setting of the City of York and in protecting the rural character of the surrounding villages. At the same time local housing needs are met and have been fully taken into account in these proposals

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** None

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** No, I do not wish to participate at hearings sessions

**If you do not wish to participate at hearing sessions, please state why:** We are not proposing any changes but would be happy to speak in support

---

## **Supporting documentation**



**Please provide any documents which support the comments made as part of this submission:**

---

**From:** [REDACTED]  
**Sent:** 25 June 2021 14:50  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 203026

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Housing Needs Update September 2020 (EX/CYC/43a)

---

## Your comments: Legal Compliance of the document

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

**Please justify why you consider the document to be legally compliant:** All legal requirements have been met.

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** We believe that the Duty to Cooperate has been fulfilled

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** The housing needs assessment has been exhaustively prepared in a professional manner . There have been several iterations of this work all of which have arrived at broadly the same conclusion as to the number of new dwellings required over the Plan period. This should give great confidence in the accuracy of this work and we are totally convinced that York's future housing needs will be fully met by these numbers. Despite the protestations of developers it is time that this analysis is accepted and we can get on with delivering on these requirements. The resultant Plan is to be commended for providing a balance between meeting housing needs and protecting the essential Green belt around York and has the support of residents of this Parish

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** None

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** No, I do not wish to participate at hearings sessions

**If you do not wish to participate at hearing sessions, please state why:** Not proposing any changes but happy to speak in support

---



## Supporting documentation

Please provide any documents which support the comments made as part of this submission:

---

**From:** [REDACTED]  
**Sent:** 29 June 2021 16:34  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, INDIVIDUAL - reference: 203861

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent my own views

---

## Your personal information

**Title:** Mr

**Name:** S Walton

**Email address:** [REDACTED]

**Telephone:** [REDACTED]

**Address:** [REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Composite Modifications Schedule April 2021 (EX/CYC/58)

---

## Your comments: Legal Compliance of the document

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

**Please justify why you consider the document to be legally compliant:** looks ok

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** ok

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Consider policies PM13 and PM14, concerning removal of Queen Elizabeth Barracks site from allocation of 500 houses unsound. Don't consider all positive mitigation factors considered, such as the availability of many dog walking parks in the last 12 months in the area as alternative spaces for dog walkers, including Haxby, Flaxton, Strensall, and others. Enough consideration not given to restricting access to the common at certain times to limit any impact or stop walkers on the common walking their dogs.

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Add back in the Queens Barracks site as allocated for housing

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** No, I do not wish to participate at hearings sessions

**If you do not wish to participate at hearing sessions, please state why:** Working

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**





**From:** [Redacted]  
**Sent:** 03 July 2021 11:46  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 204811  
**Attachments:** LP\_2005\_Poppleton\_Extract.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Green Belt Addendum January 2021 Annex 4 Other Developed Areas (EX/CYC/59f)

---

## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** No, I do not consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:**

**Please justify why you do not consider the document to be legally compliant:** In 1995 Harrogate County Council agree the village development line with York City Council. The Village settlement line was included in the 2005 plan and the new plan has taken the area that was agreed as Open Space and included parts of it now within the development of the village notable boundary 2 on the consultation document. The Neighbourhood Plan was made in 2017 and was fully consulted with the City of York Planners. The area in particular know as Blairgowrie was clearly identified as part of the conservation area and holding a particularly important significance to the Village Green. In the inspectors report on the Neighbourhood Plan the development only on the footprint of the previously existing building was seen as the only appropriate development. The movement of the Open Space of the 2005 plan to development potential in the new plan is countra to Approved Neighbourhood Plan . This is the grounds therefore for the document not to be legally compliant.

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** No, I do not consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:**

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:** There was no consultation with any members of the Neighbourhood Committee or the Parish Councils of the two villages about the removal of the special status of the area know as Blairgowrie or the originally agreed village settlement line.

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Due to the mis-match of the already approved Neighbourhood Plan and the specific boundary areas in the current local plan it is therefore not considered to be sound.

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** I suggest that the policies in the Neighbourhood Plan for Upper and Nether Poppleton specifically PNP 6D and the statements made by the Inspectorate at the time the plan was made are fully acknowledged in the boundary 5 on the current submission. So there is no mistake in recognition



of the open nature of the area and the preservation of the boundary that protects the character and setting of the village as per the 2005 agreed line of settlement.

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** I feel that have made full representation to the village so that they voted at 91 % for the adoption of the Neighbourhood Plan that the change of boundary should be noted and protected for the future of the openness of the village and the preservation of nature in the area.

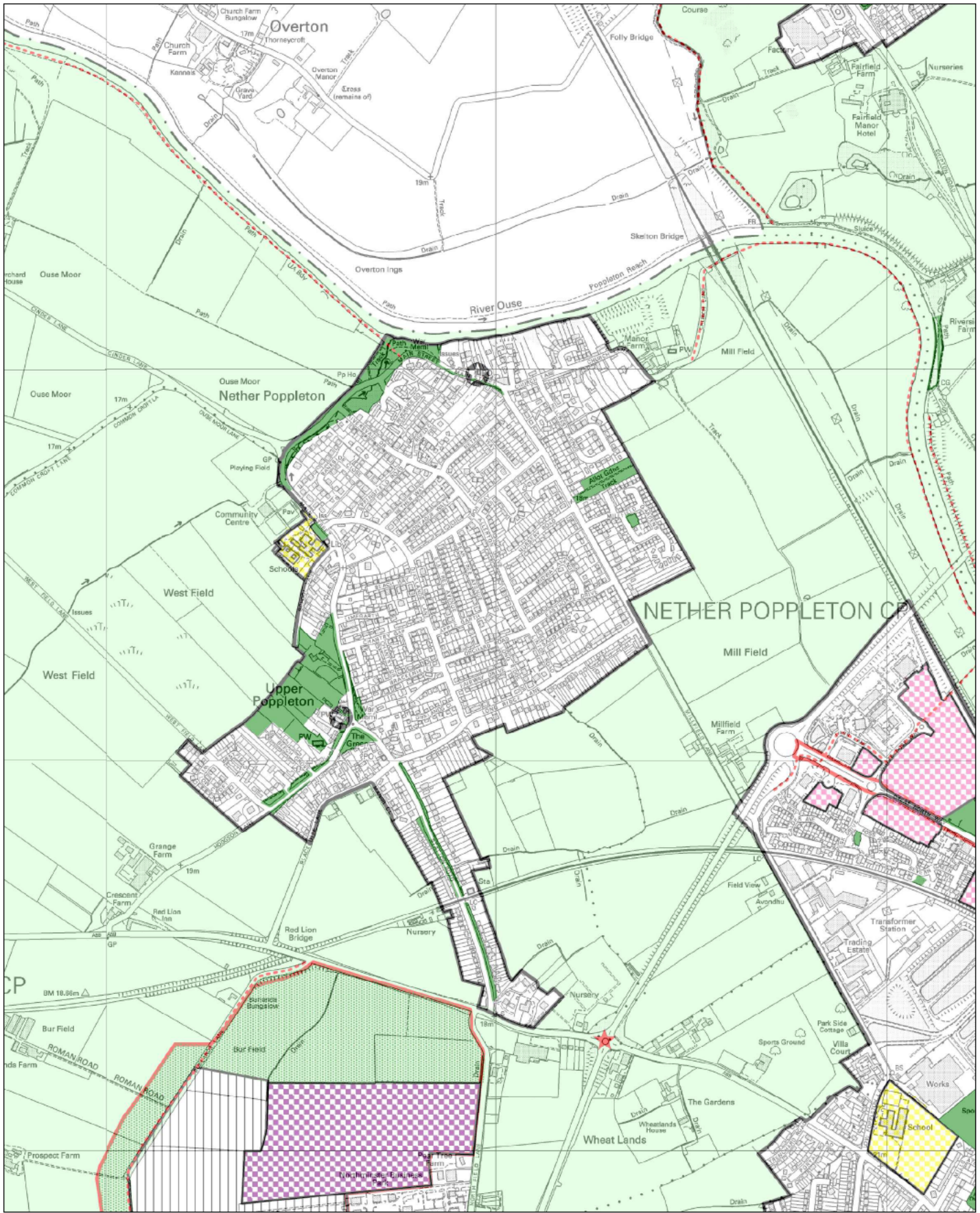
---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

LP\_2005\_Poppleton\_Extract.pdf

---




**Draft Local Plan Incorporating the Fourth Set of Changes  
Development Control Local Plan (April 2005)  
PROPOSALS MAP**




9 St Leonard's Place, York, YO1 2ET  
Telephone: 01904 551550

Reproduced from the Ordnance Survey mapping with permission of Her Majesty's Stationary Office.  
Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.  
Drawn by City Development, City of York Council Licence number: LA09067L.2006

## 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)

### 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 (SP2)

 Defined Settlement Limit (GB2)

 Major developed site in the Green Belt (GB10)


### 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 ED5)

 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 (MW1)

 Mixed Use Site



# Draft Local Plan Incorporating the Fourth Set of Changes Development Control Local Plan (April 2005) PROPOSALS MAP





**From:** [REDACTED]  
**Sent:** 04 July 2021 16:05  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, INDIVIDUAL - reference: 205016

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent my own views

---

## Your personal information

**Title:** Mr

**Name:** Mal Bruce

**Email address:** [REDACTED]

**Telephone:** [REDACTED]

**Address:** [REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Green Belt Addendum January 2021 Annex 4 Other Developed Areas (EX/CYC/59f)

---

## Your comments: Legal Compliance of the document

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

**Please justify why you consider the document to be legally compliant:** From the documents seen, I consider the Local Plan is legally compliant.

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** From the documents seen, I consider the document to be compliant with the duty to Cooperate.

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** York Council have shown good judgement and the plan is fit for purpose. I agree with York Council that the green belt boundary should follow the boundary as depicted on pages 245 and 268 which determines a clear defensible final boundary. I agree the need to define the recognisable and permanent boundary including to the rear of existing developments (between the village and the railway line in boundary 4) as depicted on pages 245 and 268. However, I do not agree with the alternative boundary to boundary 4 on page 258 as this would result in sprawl, harm to wildlife and protected species, would not protect the form and character of the conservation village or its historic landscape. A ruling by the secretary of state in 2016 ruled that land in this area should not be built on. I agree with comments on boundary 4 on page 260 re the permanence of proposed boundary, and agree with the green belt boundary as depicted on the diagrams on pages 245 and 268, and that this land should not be built on, to prevent sprawl. This will also protect Strensall as a conservation village, safeguarding wildlife in the area (boundary 4); including protected species, such as:- barn owls, bats, greater crested newts, voles, deer, foxes, badgers. Plus, this will protect the historic landscape, medieval ridge & furrows, the form and character of the conservation village and air quality. The tests of soundness are all applicable as in my comments above, except for “Justified” regarding the alternative boundary for boundary 4 on page 258. This would have an adverse effect on the permanence of the York green belt land and would result in sprawl, harm to wildlife and protected species, and would not protect the form and character of the conservation village or its historic landscape or air quality. A ruling by the secretary of state in 2016 stated that land in this area should not be built on. I agree with York Council’s conclusion that the green belt boundary should be as depicted in the diagrams on pages 245 and 268 which determines a clear defensible final boundary.

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:**

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** No, I do not wish to participate at hearings sessions

**If you do wish to participate at hearing sessions, please state why:**

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

---



**From:** [Redacted]  
**Sent:** 04 July 2021 16:27  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, INDIVIDUAL - reference: 205021

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: no

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent my own views

---

## Your personal information

**Title:** Mrs

**Name:** Linda Donnelly

**Email address:** [Redacted]

**Telephone:** [Redacted]

**Address:** [Redacted]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Approach to defining Green Belt Addendum January 2021 (EX/CYC/59)

---

## Your comments: Legal Compliance of the document

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

**Please justify why you consider the document to be legally compliant:** The plan has been prepared in line with statutory regulations

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Adequate consultation

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** In particular, I support keeping the allotments, walled garden, mast field, area South of Millennium Bridge in the permanent Green Belt. I believe keeping this in the green belt to be sound, justified and in keeping with the NPPF in that these areas perform an important role in defining the edge of York and it's historic setting at the natural edge of built development.

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:**

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** No, I do not wish to participate at hearings sessions

**If you do wish to participate at hearing sessions, please state why:**

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

---

**From:** [REDACTED]  
**Sent:** 05 July 2021 14:53  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 205308  
**Attachments:** L001\_ST9\_Land\_North\_of\_Haxby\_Haxby.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Green Belt Addendum January 2021 Annex 4 Other Developed Areas (EX/CYC/59f)

---

## Your comments: Legal Compliance of the document



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

**Please justify why you consider the document to be legally compliant:** See attached letter

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** See attached letter

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** See attached letter

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** N/A

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** To elaborate upon attached letter


---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

L001\_ST9\_Land\_North\_of\_Haxby\_Haxby.pdf

---



Local Plan  
City of York Council  
West Offices  
Station Rise  
York  
YO61 6GA



Ref: 1198LE

Date: 29<sup>th</sup> June 2021

Dear Sir / Madam,

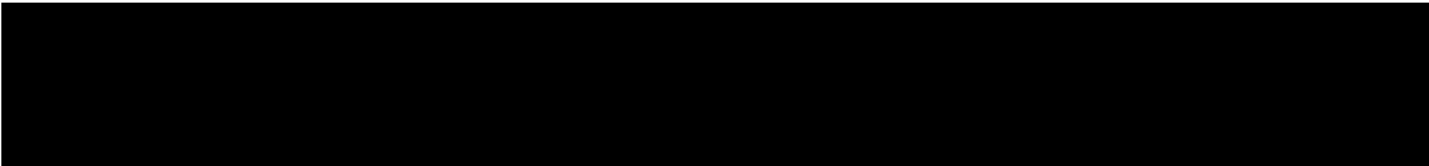
RE: COMMENTS ON THE CITY OF YORK LOCAL PLAN PROPOSED MODIFICATIONS (27<sup>TH</sup> MAY TO 7<sup>TH</sup> JULY), IN RELATION TO LAND NORTH OF HAXBY, HAXBY (STRATEGIC HOUSING SITE REF: ST9).

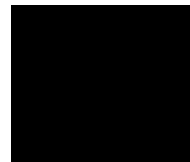
## Introduction

This submission is made on behalf of Vistry Homes (“the Developer”) and should be read in conjunction with the various detailed representations submitted to the City of York Council (“the Council”), throughout the plan making process in relation to the land referenced as ST9 (“the Site”). The representations previously submitted by DPP in support of the draft allocation of the strategic housing site known as ST9 confirmed that the Site is available and suitable for housing development, and that residential development is achievable.

The Developer wishes to **support** the draft allocation of the Site within the emerging Local Plan. The Developer is of the view that the Site does not materially fulfil any of the purposes of the Green Belt around York, when reassessed using the Council’s clarified methodology. The Developer also wishes to reiterate that the allocation of the Site in the emerging Local Plan is crucial in ensuring the Council are able to meet the housing requirement cited in the emerging Local Plan, taking into account the GL Hearn Housing Needs Update September 2020, and the SHLAA Update (April 2021).

These comments are made in respect of the following documents:

- Topic Paper TP1 Approach to defining York's Green Belt Addendum March 2021
  - Topic Paper 1 Green Belt Addendum January 2021 Annex 4: Other Densely Developed Areas in the General Extent of the Green Belt
  - Topic Paper 1 Green Belt Addendum January 2021 Annex 6: Proposed Modifications
  - Topic Paper 1 Green Belt Addendum January 2021 Annex 7: Housing Supply Update
  - GL Hearn Housing Needs Update (September 2020)
  - SHLAA Update (April 2021)
- 



## Background

By way of brief background information, the Council launched a third Regulation 19 consultation concerning the City of York Local Plan in May 2021. The consultation concerns various documents comprising the requested Composite Proposed Modifications Schedule. The documents in question have been prepared by the Council in response to a number of issues raised by the Inspectors during and following the Phase 1 hearings sessions which took place in December of 2019.

In terms of the Site, ST9 was assessed as part of the Council's site selection methodology and was deemed suitable and appropriate for development and did not need to be kept permanently open. The Site was subsequently included as a housing allocation in the Local Plan Preferred Options Draft (2013), Publication Draft Local Plan (2014), Local Plan Preferred Sites Consultation (2016) and the Local Plan Publication Draft (2018). The suitability and appropriateness of the Site for housing development has therefore never been in question.

Throughout the various iterations of the emerging Local Plan, the Council have remained satisfied that residential development on the Site is suitable, that development is achievable, and that the Site is available. The Council have also remained satisfied that the Site does not perform an important Green Belt purpose and that the proposed Green Belt boundaries are appropriate. Overall, the Council remain satisfied that the Site does not need to remain permanently open. The Developer agrees with the Council's position.

The principle of allocating the Site for housing development within the emerging Local Plan remains firmly established. Consequently, the Developer **supports** the continued allocation of ST9 within the emerging Local Plan.

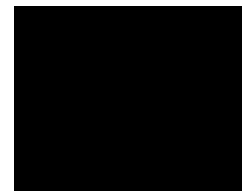
## The Test of Soundness

Paragraph 35 of the NPPF indicates that a Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound". In order to be sound, NPPF confirms that a plan should be:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs<sup>19</sup>; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) **Consistent** with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.*

It is against the above tests of soundness that the emerging Local Plan, including the proposed modifications, must be assessed.





## The Proposed Modifications

The Council have published a number of additional documents, devised to address concerns raised by the Inspectors during and following the Phase 1 hearings. Much of the work undertaken seeks to address concerns raised in relation to the methodology used by the Council to determine whether a parcel of land needs to be kept permanently open and the Green Belt boundaries.

To summarise the documents submitted, the Council have published an addendum paper, *Topic Paper 1 Approach to defining Green Belt Addendum January 2021*, ('the TP1 Addendum 2021') which seeks to update the original Topic Paper 1: Approach to the Green Belt (2018) in three key respects. First, the TP1 Addendum 2021 seeks to address the various issues which arose during the Phase 1 hearings. Secondly, the TP1 Addendum 2021 confirms that, in the opinion of the Council, the latest household projects will not have any implications in terms of the permanence of the boundaries. Finally, the TP1 Addendum 2021 seeks to address the significant concerns raised by the Inspectors concerning the methodology used by the Council in establishing the Green Belt boundaries.

Annex 4 of the TP1 Addendum 2021 contains the local level assessment of the boundaries surrounding developed areas within the Green Belt, including Haxby.

Annex 6 of the TP1 Addendum 2021 outlines the proposed amendments to the Green Belt boundaries as a result of the revisions to the methodology. No fundamental alterations are proposed, and none which directly concern the Site.

Annex 7 of the TP1 Addendum 2021 (Housing Supply Update) seeks to demonstrate that the proposed Green Belt boundaries will endure through the plan period of the emerging Local Plan and beyond, taking into account the GL Hearn Housing Needs Update September 2020, and the SHLAA update (2021). Both of these documents are also the subject of the consultation.

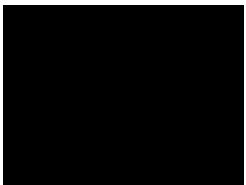
Otherwise, a number of other supporting documentation and key evidence has been published by the Council, which are also the subject of the current consultation exercise. The additional documents include an updated Habitats Regulation Assessment, and other pieces of new evidence.

## Comments and Observations on the Proposed Modifications

### Green Belt

As outlined in the TP1 Addendum 2021, the Council have sought to address the concerns raised by the Inspectors relating to the methodology used by the Council to determine whether a parcel of land needs to be kept permanently open and the Green Belt boundaries. To summarise, the Inspectors have expressed concern that the criteria (referred to as 'Shapers') used by the Council to assess sites against the five purposes of Green Belt outlined in paragraph 134 were of little relevance to issues of Green Belt.

To address this issue, the TP1 Addendum 2021 outlines how the land within the proposed Green Belt has been assessed as well as the proposed inner and outer boundaries of the Green Belt, using additional criteria to ensure that the proposed Green Belt fulfils the purposes listed in NPPF, with particular emphasis on purposes 1, 3 and 4. The criteria in question draws on evidence and work previously undertaken by the Council. The five new criteria are as follows:

- 
- *Urban Sprawl*
  - *Encroachment*
  - *Compactness*
  - *Landmark Monuments*
  - *Landscape and Setting*

The first criterion has been introduced to assess whether land fulfils purpose 1 of Green Belt (to check the unrestricted sprawl of large built-up areas). The second is used to assess land against purpose 3 (to assist in safeguarding the countryside from encroachment). The remaining three criteria are used to assess whether land fulfils the fourth purpose of Green Belt (to preserve the setting and special character of historic towns).

We feel that the revised methodology aligns more closely with the purposes of including land within the Green Belt, although we still have some concerns. Notwithstanding these concerns, it is clear that the Site does not materially contribute to any of the purposes of including land within the Green Belt, as set out in the TP1 Addendum 2021. Therefore, the allocation of ST9 remains appropriate, as acknowledged by the Council.

For completeness we have assessed the Site against the revised methodology below:

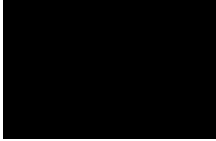
**Urban Sprawl:** The Council are content that the Site will not result in urban sprawl – the Site falls adjacent to the village Haxby, which is not a large urban area. Nevertheless, the Site is well contained by development, trees and hedgerows and there are limited views into the Site. The Site is comprised of a number of long linear fields divided by hedgerows, trees and drainage ditches. It does not have a sense of openness although it is open. The boundaries of the Site are established and clear and provide a logical edge to Haxby. The development of the Site would therefore be restricted and would not result in sprawl.

**Encroachment:** The Site is in the countryside however the character of the Site is not one of open fields with extensive views across it to the City of York and nor is there public access across it. Annex 4 of the TP1 Addendum notes that there are existing pockets of ribbon development located on Moor Lane, which the Site encompasses. This serves to reduce the extent by which the Site is extending into the countryside.

**Compactness:** As the proposed allocation adjoins the settlement of Haxby on its northern side and as such the development of the Site will not undermine the perception of the compact form of the City of York. Haxby is a relatively large settlement and the development of ST9 is a logical extension of this sustainable settlement which will reinforce the perception of the compactness of Haxby. Further, given the location of the Site, the development of this land will not lead to Haxby coalescing with any settlement, not least the City of York.

The development of the Site will not affect the relation between the City of York and the surrounding ring of villages, and it will not affect the strays, Ings and green wedges or the open approaches to the city.

**Landmark Monuments:** Haxby Conservation Area is situated in the centre of the village, a considerable distance from the Site itself, and is separated from the Site by relatively modern suburban housing. There are no other heritage assets in the vicinity of the Site. The City of York is situated to the south of the village and is not visible from within the Site. When traveling around the ring road the Site is not visible. Further, we would not describe Haxby Road as an open approach



into the City as it travels through Haxby itself. Nevertheless, when approaching the City of York, via Haxby Road, the Site is seen against the backdrop of Haxby which does not compromise the setting of York.

**Landscape Setting:** Given the location of the Site to the north of Haxby the land does not aid the understanding of the historical relationship of York to its rural hinterland. When travelling around York it retains the perception of a City within a rural setting. The Site does not lie within any of the strays, Ings, river corridors or green wedges which we agree are important to the special character of the City of York.

The Council have concluded that the Site does not serve any important purposes for the inclusion of land within the Green Belt when assessed against these criteria in the revised TP1 Addendum 2021. More specifically, the Council have confirmed that the Site lies outside the extent of land specifically identified by the evidence base as being important for maintaining the historic character and setting of York. Equally, they confirm that Site does not fall within an area which needs to remain open to aid the perception of the compactness of the City of York or its rural setting.

The Developer continues to **support** the conclusions reached by the Council and **supports** the allocation of the Site in the emerging Local Plan and the conclusions reached in the TP1 Addendum 2021 and the associated evidence base regarding ST9.

## Boundaries

The Developer also **supports** the settlement limits and Green Belt boundary as proposed within the emerging Local Plan. In particular, the northernmost boundary is a clear and logical edge to the settlement. From Moor Lane, the boundary runs northward, with the adopted highway providing a clear physical edge. The boundary subsequently moves eastwards towards Usher Lane, encompassing the Site. The northern boundary of the Site follows established field boundaries, comprised of trees, hedgerow and drainage ditches. On the east side the boundary follows Usher Lane. The boundary is sufficiently permanent and is clearly distinguishable. It provides a recognisable and logical edge to the settlement, and ensures that the settlement, and open countryside to the north remain distinct and separate. The Developer is of the view that the use of such a strong and clear boundary will ensure the Council are able to prevent unrestricted sprawl and encroachment into the countryside. The Developer **supports** the Green Belt boundary in this location.

The Developer **supports** the Green Belt boundary in this location.

## Housing Need

The consultation also concerns the GL Hearn Housing Needs Update (September 2020), and the SHLAA Update (April 2021). Within the former document, GL Hearn report that the housing requirement of 790 dpa identified within the Housing Need Update 2019 remains an appropriate figure, given that the need for housing in the city has not materially changed. The Council therefore continue to use a housing requirement of 822 dwellings per annum, first cited within the Proposed Modifications Consultation (2019). This is based upon a revised OAN of 790 dwellings per annum, plus a further 32 dwellings per annum to account for a shortfall in completions between 2012-2017.

The Developer does not wish to comment specifically on the OAN calculation used by the Council. However, they do wish to reiterate the importance of the Site's allocation in ensuring that the Council are able to achieve the delivery trajectory outlined within the SHLAA Update, and in meeting the housing requirement identified in the GL Hearn report. As noted within the SHLAA Update 2021, the Site will contribute approximately 665 dwellings within the Plan Period. The





Developer is content that the development of the Site will deliver in excess of the requisite volume of units cited in the SHLAA and remains confident that the vast majority of dwellings can be delivered within the Plan Period. The Developer is content that the development of the Site will deliver the much-needed new dwellings envisaged and remains confident that completion of the Site can be achieved within the short term. The Developer is a top 5 housebuilder (rather than simply a land promotor) with a strong track record of delivering both market and affordable homes.

The Developer continues to **Support** as a draft allocation. The Developer remains committed to the development of the Site, which remains available, suitable and deliverable. The Developer also supports the estimated development capacity of the Site and confirms that this can be delivered in the plan period.

**Other Matters**

The Developer has no comment to make in relation to the remaining documents currently the subject of the ongoing consultation.

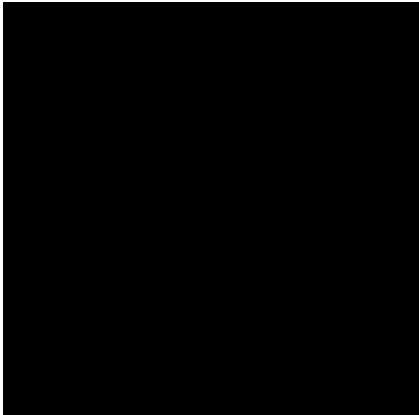
**Compliance with the Test of Soundness**

Having considered the updated and additional information relating to the Council’s methodology to determine; whether land needs to be kept permanently open and included in the Green Belt, and the delineation of appropriate Green Belt boundaries, it is clear that the Site remains suitable as a housing allocation, that the Site does not need to be kept permanently open and that the Green Belt boundaries are appropriate. The Developer supports the assessment of the Site and the conclusion reached regarding it. In this respect, the Developer is of the view that the Local Plan has been **positively prepared**, and that the allocation of Site ST9 is **deliverable, justified** and **consistent** with NPPF.

The GL Hearn Housing Needs Update 2020, and the SHLAA Update 2021 serve to underline the importance of the Site in enabling the Council to deliver housing within the plan period. The Council have accepted that ST9 is available and that the Site is suitable for residential development, and it can be delivered.

The Developer therefore wholly **supports** the allocation known as ST9. The Developer also **supports** the estimated development capacity of the Site and confirm that this can be delivered within the plan period.

Yours sincerely,



**From:** [REDACTED]  
**Sent:** 05 July 2021 14:49  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 205304  
**Attachments:** L001\_ST9\_Land\_North\_of\_Haxby\_Haxby.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Approach to defining Green Belt Addendum January 2021 (EX/CYC/59)

---

## Your comments: Legal Compliance of the document

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

**Please justify why you consider the document to be legally compliant:** See attached letter

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** See attached letter

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** See attached letter

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** N/A

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** To elaborate upon attached letter

---


## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

L001\_ST9\_Land\_North\_of\_Haxby\_Haxby.pdf

---





Local Plan  
City of York Council  
West Offices  
Station Rise  
York  
YO61 6GA



Ref: 1198LE

Date: 29<sup>th</sup> June 2021

Dear Sir / Madam,

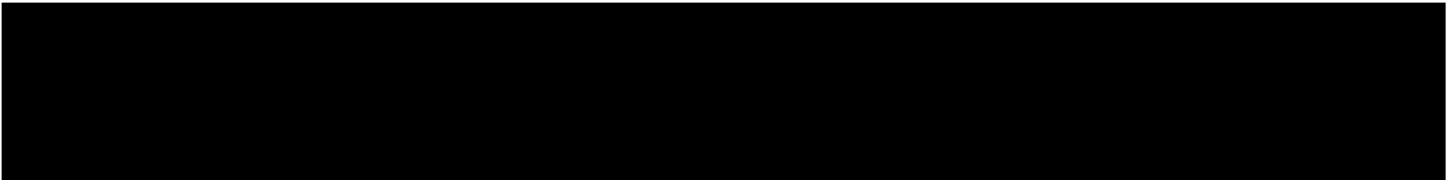
RE: COMMENTS ON THE CITY OF YORK LOCAL PLAN PROPOSED MODIFICATIONS (27<sup>TH</sup> MAY TO 7<sup>TH</sup> JULY), IN RELATION TO LAND NORTH OF HAXBY, HAXBY (STRATEGIC HOUSING SITE REF: ST9).

## Introduction

This submission is made on behalf of Vistry Homes (“the Developer”) and should be read in conjunction with the various detailed representations submitted to the City of York Council (“the Council”), throughout the plan making process in relation to the land referenced as ST9 (“the Site”). The representations previously submitted by DPP in support of the draft allocation of the strategic housing site known as ST9 confirmed that the Site is available and suitable for housing development, and that residential development is achievable.

The Developer wishes to **support** the draft allocation of the Site within the emerging Local Plan. The Developer is of the view that the Site does not materially fulfil any of the purposes of the Green Belt around York, when reassessed using the Council’s clarified methodology. The Developer also wishes to reiterate that the allocation of the Site in the emerging Local Plan is crucial in ensuring the Council are able to meet the housing requirement cited in the emerging Local Plan, taking into account the GL Hearn Housing Needs Update September 2020, and the SHLAA Update (April 2021).

These comments are made in respect of the following documents:

- Topic Paper TP1 Approach to defining York's Green Belt Addendum March 2021
  - Topic Paper 1 Green Belt Addendum January 2021 Annex 4: Other Densely Developed Areas in the General Extent of the Green Belt
  - Topic Paper 1 Green Belt Addendum January 2021 Annex 6: Proposed Modifications
  - Topic Paper 1 Green Belt Addendum January 2021 Annex 7: Housing Supply Update
  - GL Hearn Housing Needs Update (September 2020)
  - SHLAA Update (April 2021)
- 



## Background

By way of brief background information, the Council launched a third Regulation 19 consultation concerning the City of York Local Plan in May 2021. The consultation concerns various documents comprising the requested Composite Proposed Modifications Schedule. The documents in question have been prepared by the Council in response to a number of issues raised by the Inspectors during and following the Phase 1 hearings sessions which took place in December of 2019.

In terms of the Site, ST9 was assessed as part of the Council's site selection methodology and was deemed suitable and appropriate for development and did not need to be kept permanently open. The Site was subsequently included as a housing allocation in the Local Plan Preferred Options Draft (2013), Publication Draft Local Plan (2014), Local Plan Preferred Sites Consultation (2016) and the Local Plan Publication Draft (2018). The suitability and appropriateness of the Site for housing development has therefore never been in question.

Throughout the various iterations of the emerging Local Plan, the Council have remained satisfied that residential development on the Site is suitable, that development is achievable, and that the Site is available. The Council have also remained satisfied that the Site does not perform an important Green Belt purpose and that the proposed Green Belt boundaries are appropriate. Overall, the Council remain satisfied that the Site does not need to remain permanently open. The Developer agrees with the Council's position.

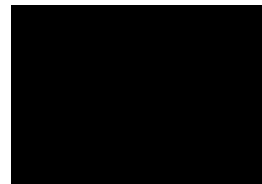
The principle of allocating the Site for housing development within the emerging Local Plan remains firmly established. Consequently, the Developer **supports** the continued allocation of ST9 within the emerging Local Plan.

## The Test of Soundness

Paragraph 35 of the NPPF indicates that a Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound". In order to be sound, NPPF confirms that a plan should be:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs<sup>19</sup>; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) **Consistent** with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.*

It is against the above tests of soundness that the emerging Local Plan, including the proposed modifications, must be assessed.



## The Proposed Modifications

The Council have published a number of additional documents, devised to address concerns raised by the Inspectors during and following the Phase 1 hearings. Much of the work undertaken seeks to address concerns raised in relation to the methodology used by the Council to determine whether a parcel of land needs to be kept permanently open and the Green Belt boundaries.

To summarise the documents submitted, the Council have published an addendum paper, *Topic Paper 1 Approach to defining Green Belt Addendum January 2021*, ('the TP1 Addendum 2021') which seeks to update the original Topic Paper 1: Approach to the Green Belt (2018) in three key respects. First, the TP1 Addendum 2021 seeks to address the various issues which arose during the Phase 1 hearings. Secondly, the TP1 Addendum 2021 confirms that, in the opinion of the Council, the latest household projects will not have any implications in terms of the permanence of the boundaries. Finally, the TP1 Addendum 2021 seeks to address the significant concerns raised by the Inspectors concerning the methodology used by the Council in establishing the Green Belt boundaries.

Annex 4 of the TP1 Addendum 2021 contains the local level assessment of the boundaries surrounding developed areas within the Green Belt, including Haxby.

Annex 6 of the TP1 Addendum 2021 outlines the proposed amendments to the Green Belt boundaries as a result of the revisions to the methodology. No fundamental alterations are proposed, and none which directly concern the Site.

Annex 7 of the TP1 Addendum 2021 (Housing Supply Update) seeks to demonstrate that the proposed Green Belt boundaries will endure through the plan period of the emerging Local Plan and beyond, taking into account the GL Hearn Housing Needs Update September 2020, and the SHLAA update (2021). Both of these documents are also the subject of the consultation.

Otherwise, a number of other supporting documentation and key evidence has been published by the Council, which are also the subject of the current consultation exercise. The additional documents include an updated Habitats Regulation Assessment, and other pieces of new evidence.

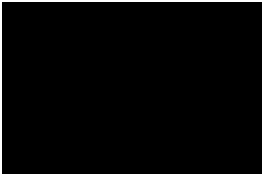
## Comments and Observations on the Proposed Modifications

### Green Belt

As outlined in the TP1 Addendum 2021, the Council have sought to address the concerns raised by the Inspectors relating to the methodology used by the Council to determine whether a parcel of land needs to be kept permanently open and the Green Belt boundaries. To summarise, the Inspectors have expressed concern that the criteria (referred to as 'Shapers') used by the Council to assess sites against the five purposes of Green Belt outlined in paragraph 134 were of little relevance to issues of Green Belt.

To address this issue, the TP1 Addendum 2021 outlines how the land within the proposed Green Belt has been assessed as well as the proposed inner and outer boundaries of the Green Belt, using additional criteria to ensure that the proposed Green Belt fulfils the purposes listed in NPPF, with particular emphasis on purposes 1, 3 and 4. The criteria in question draws on evidence and work previously undertaken by the Council. The five new criteria are as follows:



- 
- *Urban Sprawl*
  - *Encroachment*
  - *Compactness*
  - *Landmark Monuments*
  - *Landscape and Setting*

The first criterion has been introduced to assess whether land fulfils purpose 1 of Green Belt (to check the unrestricted sprawl of large built-up areas). The second is used to assess land against purpose 3 (to assist in safeguarding the countryside from encroachment). The remaining three criteria are used to assess whether land fulfils the fourth purpose of Green Belt (to preserve the setting and special character of historic towns).

We feel that the revised methodology aligns more closely with the purposes of including land within the Green Belt, although we still have some concerns. Notwithstanding these concerns, it is clear that the Site does not materially contribute to any of the purposes of including land within the Green Belt, as set out in the TP1 Addendum 2021. Therefore, the allocation of ST9 remains appropriate, as acknowledged by the Council.

For completeness we have assessed the Site against the revised methodology below:

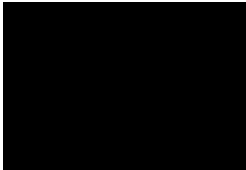
**Urban Sprawl:** The Council are content that the Site will not result in urban sprawl – the Site falls adjacent to the village Haxby, which is not a large urban area. Nevertheless, the Site is well contained by development, trees and hedgerows and there are limited views into the Site. The Site is comprised of a number of long linear fields divided by hedgerows, trees and drainage ditches. It does not have a sense of openness although it is open. The boundaries of the Site are established and clear and provide a logical edge to Haxby. The development of the Site would therefore be restricted and would not result in sprawl.

**Encroachment:** The Site is in the countryside however the character of the Site is not one of open fields with extensive views across it to the City of York and nor is there public access across it. Annex 4 of the TP1 Addendum notes that there are existing pockets of ribbon development located on Moor Lane, which the Site encompasses. This serves to reduce the extent by which the Site is extending into the countryside.

**Compactness:** As the proposed allocation adjoins the settlement of Haxby on its northern side and as such the development of the Site will not undermine the perception of the compact form of the City of York. Haxby is a relatively large settlement and the development of ST9 is a logical extension of this sustainable settlement which will reinforce the perception of the compactness of Haxby. Further, given the location of the Site, the development of this land will not lead to Haxby coalescing with any settlement, not least the City of York.

The development of the Site will not affect the relation between the City of York and the surrounding ring of villages, and it will not affect the strays, Ings and green wedges or the open approaches to the city.

**Landmark Monuments:** Haxby Conservation Area is situated in the centre of the village, a considerable distance from the Site itself, and is separated from the Site by relatively modern suburban housing. There are no other heritage assets in the vicinity of the Site. The City of York is situated to the south of the village and is not visible from within the Site. When traveling around the ring road the Site is not visible. Further, we would not describe Haxby Road as an open approach



into the City as it travels through Haxby itself. Nevertheless, when approaching the City of York, via Haxby Road, the Site is seen against the backdrop of Haxby which does not compromise the setting of York.

**Landscape Setting:** Given the location of the Site to the north of Haxby the land does not aid the understanding of the historical relationship of York to its rural hinterland. When travelling around York it retains the perception of a City within a rural setting. The Site does not lie within any of the strays, Ings, river corridors or green wedges which we agree are important to the special character of the City of York.

The Council have concluded that the Site does not serve any important purposes for the inclusion of land within the Green Belt when assessed against these criteria in the revised TP1 Addendum 2021. More specifically, the Council have confirmed that the Site lies outside the extent of land specifically identified by the evidence base as being important for maintaining the historic character and setting of York. Equally, they confirm that Site does not fall within an area which needs to remain open to aid the perception of the compactness of the City of York or its rural setting.

The Developer continues to **support** the conclusions reached by the Council and **supports** the allocation of the Site in the emerging Local Plan and the conclusions reached in the TP1 Addendum 2021 and the associated evidence base regarding ST9.

## Boundaries

The Developer also **supports** the settlement limits and Green Belt boundary as proposed within the emerging Local Plan. In particular, the northernmost boundary is a clear and logical edge to the settlement. From Moor Lane, the boundary runs northward, with the adopted highway providing a clear physical edge. The boundary subsequently moves eastwards towards Usher Lane, encompassing the Site. The northern boundary of the Site follows established field boundaries, comprised of trees, hedgerow and drainage ditches. On the east side the boundary follows Usher Lane. The boundary is sufficiently permanent and is clearly distinguishable. It provides a recognisable and logical edge to the settlement, and ensures that the settlement, and open countryside to the north remain distinct and separate. The Developer is of the view that the use of such a strong and clear boundary will ensure the Council are able to prevent unrestricted sprawl and encroachment into the countryside. The Developer **supports** the Green Belt boundary in this location.

The Developer **supports** the Green Belt boundary in this location.

## Housing Need

The consultation also concerns the GL Hearn Housing Needs Update (September 2020), and the SHLAA Update (April 2021). Within the former document, GL Hearn report that the housing requirement of 790 dpa identified within the Housing Need Update 2019 remains an appropriate figure, given that the need for housing in the city has not materially changed. The Council therefore continue to use a housing requirement of 822 dwellings per annum, first cited within the Proposed Modifications Consultation (2019). This is based upon a revised OAN of 790 dwellings per annum, plus a further 32 dwellings per annum to account for a shortfall in completions between 2012-2017.

The Developer does not wish to comment specifically on the OAN calculation used by the Council. However, they do wish to reiterate the importance of the Site's allocation in ensuring that the Council are able to achieve the delivery trajectory outlined within the SHLAA Update, and in meeting the housing requirement identified in the GL Hearn report. As noted within the SHLAA Update 2021, the Site will contribute approximately 665 dwellings within the Plan Period. The



Developer is content that the development of the Site will deliver in excess of the requisite volume of units cited in the SHLAA and remains confident that the vast majority of dwellings can be delivered within the Plan Period. The Developer is content that the development of the Site will deliver the much-needed new dwellings envisaged and remains confident that completion of the Site can be achieved within the short term. The Developer is a top 5 housebuilder (rather than simply a land promotor) with a strong track record of delivering both market and affordable homes.

The Developer continues to **Support** as a draft allocation. The Developer remains committed to the development of the Site, which remains available, suitable and deliverable. The Developer also supports the estimated development capacity of the Site and confirms that this can be delivered in the plan period.

**Other Matters**

The Developer has no comment to make in relation to the remaining documents currently the subject of the ongoing consultation.

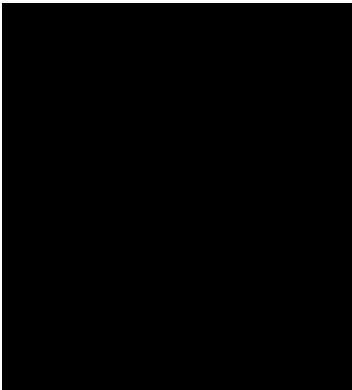
**Compliance with the Test of Soundness**

Having considered the updated and additional information relating to the Council’s methodology to determine; whether land needs to be kept permanently open and included in the Green Belt, and the delineation of appropriate Green Belt boundaries, it is clear that the Site remains suitable as a housing allocation, that the Site does not need to be kept permanently open and that the Green Belt boundaries are appropriate. The Developer supports the assessment of the Site and the conclusion reached regarding it. In this respect, the Developer is of the view that the Local Plan has been **positively prepared**, and that the allocation of Site ST9 is **deliverable, justified and consistent** with NPPF.

The GL Hearn Housing Needs Update 2020, and the SHLAA Update 2021 serve to underline the importance of the Site in enabling the Council to deliver housing within the plan period. The Council have accepted that ST9 is available and that the Site is suitable for residential development, and it can be delivered.

The Developer therefore wholly **supports** the allocation known as ST9. The Developer also **supports** the estimated development capacity of the Site and confirm that this can be delivered within the plan period.

Yours sincerely,





**From:** [REDACTED]  
**Sent:** 05 July 2021 14:55  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 205312  
**Attachments:** L001\_ST9\_Land\_North\_of\_Haxby\_Haxby.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update (EX/CYC/59i)

---

## Your comments: Legal Compliance of the document

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

**Please justify why you consider the document to be legally compliant:** See attached letter

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** See attached letter

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** See attached letter

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** N/A

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** To elaborate upon attached letter

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

L001\_ST9\_Land\_North\_of\_Haxby\_Haxby.pdf

---



Local Plan  
City of York Council  
West Offices  
Station Rise  
York  
YO61 6GA



Ref: 1198LE

Date: 29<sup>th</sup> June 2021

Dear Sir / Madam,

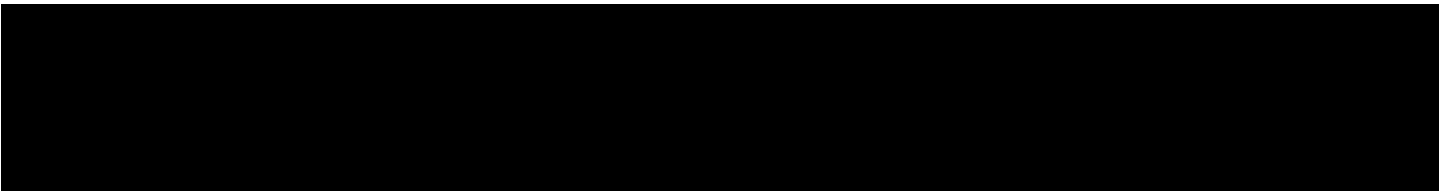
RE: COMMENTS ON THE CITY OF YORK LOCAL PLAN PROPOSED MODIFICATIONS (27<sup>TH</sup> MAY TO 7<sup>TH</sup> JULY), IN RELATION TO LAND NORTH OF HAXBY, HAXBY (STRATEGIC HOUSING SITE REF: ST9).

## Introduction

This submission is made on behalf of Vistry Homes (“the Developer”) and should be read in conjunction with the various detailed representations submitted to the City of York Council (“the Council”), throughout the plan making process in relation to the land referenced as ST9 (“the Site”). The representations previously submitted by DPP in support of the draft allocation of the strategic housing site known as ST9 confirmed that the Site is available and suitable for housing development, and that residential development is achievable.

The Developer wishes to **support** the draft allocation of the Site within the emerging Local Plan. The Developer is of the view that the Site does not materially fulfil any of the purposes of the Green Belt around York, when reassessed using the Council’s clarified methodology. The Developer also wishes to reiterate that the allocation of the Site in the emerging Local Plan is crucial in ensuring the Council are able to meet the housing requirement cited in the emerging Local Plan, taking into account the GL Hearn Housing Needs Update September 2020, and the SHLAA Update (April 2021).

These comments are made in respect of the following documents:

- Topic Paper TP1 Approach to defining York's Green Belt Addendum March 2021
  - Topic Paper 1 Green Belt Addendum January 2021 Annex 4: Other Densely Developed Areas in the General Extent of the Green Belt
  - Topic Paper 1 Green Belt Addendum January 2021 Annex 6: Proposed Modifications
  - Topic Paper 1 Green Belt Addendum January 2021 Annex 7: Housing Supply Update
  - GL Hearn Housing Needs Update (September 2020)
  - SHLAA Update (April 2021)
- 



## Background

By way of brief background information, the Council launched a third Regulation 19 consultation concerning the City of York Local Plan in May 2021. The consultation concerns various documents comprising the requested Composite Proposed Modifications Schedule. The documents in question have been prepared by the Council in response to a number of issues raised by the Inspectors during and following the Phase 1 hearings sessions which took place in December of 2019.

In terms of the Site, ST9 was assessed as part of the Council's site selection methodology and was deemed suitable and appropriate for development and did not need to be kept permanently open. The Site was subsequently included as a housing allocation in the Local Plan Preferred Options Draft (2013), Publication Draft Local Plan (2014), Local Plan Preferred Sites Consultation (2016) and the Local Plan Publication Draft (2018). The suitability and appropriateness of the Site for housing development has therefore never been in question.

Throughout the various iterations of the emerging Local Plan, the Council have remained satisfied that residential development on the Site is suitable, that development is achievable, and that the Site is available. The Council have also remained satisfied that the Site does not perform an important Green Belt purpose and that the proposed Green Belt boundaries are appropriate. Overall, the Council remain satisfied that the Site does not need to remain permanently open. The Developer agrees with the Council's position.

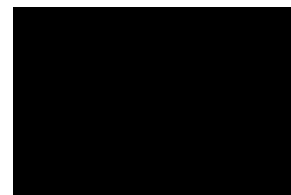
The principle of allocating the Site for housing development within the emerging Local Plan remains firmly established. Consequently, the Developer **supports** the continued allocation of ST9 within the emerging Local Plan.

## The Test of Soundness

Paragraph 35 of the NPPF indicates that a Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound". In order to be sound, NPPF confirms that a plan should be:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs<sup>19</sup>; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) **Consistent** with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.*

It is against the above tests of soundness that the emerging Local Plan, including the proposed modifications, must be assessed.



## The Proposed Modifications

The Council have published a number of additional documents, devised to address concerns raised by the Inspectors during and following the Phase 1 hearings. Much of the work undertaken seeks to address concerns raised in relation to the methodology used by the Council to determine whether a parcel of land needs to be kept permanently open and the Green Belt boundaries.

To summarise the documents submitted, the Council have published an addendum paper, *Topic Paper 1 Approach to defining Green Belt Addendum January 2021*, ('the TP1 Addendum 2021') which seeks to update the original Topic Paper 1: Approach to the Green Belt (2018) in three key respects. First, the TP1 Addendum 2021 seeks to address the various issues which arose during the Phase 1 hearings. Secondly, the TP1 Addendum 2021 confirms that, in the opinion of the Council, the latest household projects will not have any implications in terms of the permanence of the boundaries. Finally, the TP1 Addendum 2021 seeks to address the significant concerns raised by the Inspectors concerning the methodology used by the Council in establishing the Green Belt boundaries.

Annex 4 of the TP1 Addendum 2021 contains the local level assessment of the boundaries surrounding developed areas within the Green Belt, including Haxby.

Annex 6 of the TP1 Addendum 2021 outlines the proposed amendments to the Green Belt boundaries as a result of the revisions to the methodology. No fundamental alterations are proposed, and none which directly concern the Site.

Annex 7 of the TP1 Addendum 2021 (Housing Supply Update) seeks to demonstrate that the proposed Green Belt boundaries will endure through the plan period of the emerging Local Plan and beyond, taking into account the GL Hearn Housing Needs Update September 2020, and the SHLAA update (2021). Both of these documents are also the subject of the consultation.

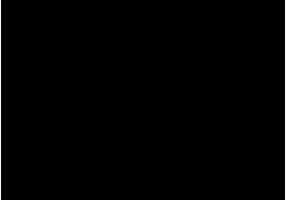
Otherwise, a number of other supporting documentation and key evidence has been published by the Council, which are also the subject of the current consultation exercise. The additional documents include an updated Habitats Regulation Assessment, and other pieces of new evidence.

## Comments and Observations on the Proposed Modifications

### Green Belt

As outlined in the TP1 Addendum 2021, the Council have sought to address the concerns raised by the Inspectors relating to the methodology used by the Council to determine whether a parcel of land needs to be kept permanently open and the Green Belt boundaries. To summarise, the Inspectors have expressed concern that the criteria (referred to as 'Shapers') used by the Council to assess sites against the five purposes of Green Belt outlined in paragraph 134 were of little relevance to issues of Green Belt.

To address this issue, the TP1 Addendum 2021 outlines how the land within the proposed Green Belt has been assessed as well as the proposed inner and outer boundaries of the Green Belt, using additional criteria to ensure that the proposed Green Belt fulfils the purposes listed in NPPF, with particular emphasis on purposes 1, 3 and 4. The criteria in question draws on evidence and work previously undertaken by the Council. The five new criteria are as follows:

- 
- *Urban Sprawl*
  - *Encroachment*
  - *Compactness*
  - *Landmark Monuments*
  - *Landscape and Setting*

The first criterion has been introduced to assess whether land fulfils purpose 1 of Green Belt (to check the unrestricted sprawl of large built-up areas). The second is used to assess land against purpose 3 (to assist in safeguarding the countryside from encroachment). The remaining three criteria are used to assess whether land fulfils the fourth purpose of Green Belt (to preserve the setting and special character of historic towns).

We feel that the revised methodology aligns more closely with the purposes of including land within the Green Belt, although we still have some concerns. Notwithstanding these concerns, it is clear that the Site does not materially contribute to any of the purposes of including land within the Green Belt, as set out in the TP1 Addendum 2021. Therefore, the allocation of ST9 remains appropriate, as acknowledged by the Council.

For completeness we have assessed the Site against the revised methodology below:

**Urban Sprawl:** The Council are content that the Site will not result in urban sprawl – the Site falls adjacent to the village Haxby, which is not a large urban area. Nevertheless, the Site is well contained by development, trees and hedgerows and there are limited views into the Site. The Site is comprised of a number of long linear fields divided by hedgerows, trees and drainage ditches. It does not have a sense of openness although it is open. The boundaries of the Site are established and clear and provide a logical edge to Haxby. The development of the Site would therefore be restricted and would not result in sprawl.

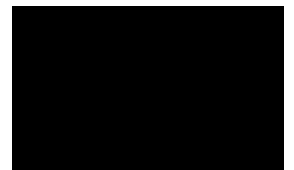
**Encroachment:** The Site is in the countryside however the character of the Site is not one of open fields with extensive views across it to the City of York and nor is there public access across it. Annex 4 of the TP1 Addendum notes that there are existing pockets of ribbon development located on Moor Lane, which the Site encompasses. This serves to reduce the extent by which the Site is extending into the countryside.

**Compactness:** As the proposed allocation adjoins the settlement of Haxby on its northern side and as such the development of the Site will not undermine the perception of the compact form of the City of York. Haxby is a relatively large settlement and the development of ST9 is a logical extension of this sustainable settlement which will reinforce the perception of the compactness of Haxby. Further, given the location of the Site, the development of this land will not lead to Haxby coalescing with any settlement, not least the City of York.

The development of the Site will not affect the relation between the City of York and the surrounding ring of villages, and it will not affect the strays, Ings and green wedges or the open approaches to the city.

**Landmark Monuments:** Haxby Conservation Area is situated in the centre of the village, a considerable distance from the Site itself, and is separated from the Site by relatively modern suburban housing. There are no other heritage assets in the vicinity of the Site. The City of York is situated to the south of the village and is not visible from within the Site. When traveling around the ring road the Site is not visible. Further, we would not describe Haxby Road as an open approach





into the City as it travels through Haxby itself. Nevertheless, when approaching the City of York, via Haxby Road, the Site is seen against the backdrop of Haxby which does not compromise the setting of York.

**Landscape Setting:** Given the location of the Site to the north of Haxby the land does not aid the understanding of the historical relationship of York to its rural hinterland. When travelling around York it retains the perception of a City within a rural setting. The Site does not lie within any of the strays, Ings, river corridors or green wedges which we agree are important to the special character of the City of York.

The Council have concluded that the Site does not serve any important purposes for the inclusion of land within the Green Belt when assessed against these criteria in the revised TP1 Addendum 2021. More specifically, the Council have confirmed that the Site lies outside the extent of land specifically identified by the evidence base as being important for maintaining the historic character and setting of York. Equally, they confirm that Site does not fall within an area which needs to remain open to aid the perception of the compactness of the City of York or its rural setting.

The Developer continues to **support** the conclusions reached by the Council and **supports** the allocation of the Site in the emerging Local Plan and the conclusions reached in the TP1 Addendum 2021 and the associated evidence base regarding ST9.

## Boundaries

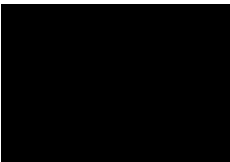
The Developer also **supports** the settlement limits and Green Belt boundary as proposed within the emerging Local Plan. In particular, the northernmost boundary is a clear and logical edge to the settlement. From Moor Lane, the boundary runs northward, with the adopted highway providing a clear physical edge. The boundary subsequently moves eastwards towards Usher Lane, encompassing the Site. The northern boundary of the Site follows established field boundaries, comprised of trees, hedgerow and drainage ditches. On the east side the boundary follows Usher Lane. The boundary is sufficiently permanent and is clearly distinguishable. It provides a recognisable and logical edge to the settlement, and ensures that the settlement, and open countryside to the north remain distinct and separate. The Developer is of the view that the use of such a strong and clear boundary will ensure the Council are able to prevent unrestricted sprawl and encroachment into the countryside. The Developer **supports** the Green Belt boundary in this location.

The Developer **supports** the Green Belt boundary in this location.

## Housing Need

The consultation also concerns the GL Hearn Housing Needs Update (September 2020), and the SHLAA Update (April 2021). Within the former document, GL Hearn report that the housing requirement of 790 dpa identified within the Housing Need Update 2019 remains an appropriate figure, given that the need for housing in the city has not materially changed. The Council therefore continue to use a housing requirement of 822 dwellings per annum, first cited within the Proposed Modifications Consultation (2019). This is based upon a revised OAN of 790 dwellings per annum, plus a further 32 dwellings per annum to account for a shortfall in completions between 2012-2017.

The Developer does not wish to comment specifically on the OAN calculation used by the Council. However, they do wish to reiterate the importance of the Site's allocation in ensuring that the Council are able to achieve the delivery trajectory outlined within the SHLAA Update, and in meeting the housing requirement identified in the GL Hearn report. As noted within the SHLAA Update 2021, the Site will contribute approximately 665 dwellings within the Plan Period. The



Developer is content that the development of the Site will deliver in excess of the requisite volume of units cited in the SHLAA and remains confident that the vast majority of dwellings can be delivered within the Plan Period. The Developer is content that the development of the Site will deliver the much-needed new dwellings envisaged and remains confident that completion of the Site can be achieved within the short term. The Developer is a top 5 housebuilder (rather than simply a land promotor) with a strong track record of delivering both market and affordable homes.

The Developer continues to **Support** as a draft allocation. The Developer remains committed to the development of the Site, which remains available, suitable and deliverable. The Developer also supports the estimated development capacity of the Site and confirms that this can be delivered in the plan period.

**Other Matters**

The Developer has no comment to make in relation to the remaining documents currently the subject of the ongoing consultation.

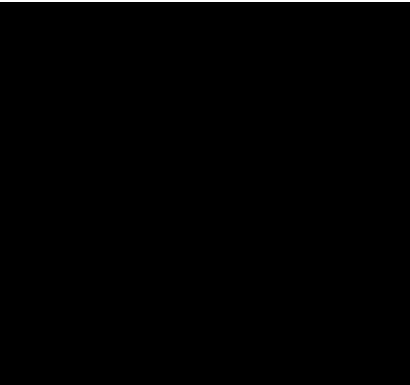
**Compliance with the Test of Soundness**

Having considered the updated and additional information relating to the Council’s methodology to determine; whether land needs to be kept permanently open and included in the Green Belt, and the delineation of appropriate Green Belt boundaries, it is clear that the Site remains suitable as a housing allocation, that the Site does not need to be kept permanently open and that the Green Belt boundaries are appropriate. The Developer supports the assessment of the Site and the conclusion reached regarding it. In this respect, the Developer is of the view that the Local Plan has been **positively prepared**, and that the allocation of Site ST9 is **deliverable, justified and consistent** with NPPF.

The GL Hearn Housing Needs Update 2020, and the SHLAA Update 2021 serve to underline the importance of the Site in enabling the Council to deliver housing within the plan period. The Council have accepted that ST9 is available and that the Site is suitable for residential development, and it can be delivered.

The Developer therefore wholly **supports** the allocation known as ST9. The Developer also **supports** the estimated development capacity of the Site and confirm that this can be delivered within the plan period.

Yours sincerely,



**From:** [REDACTED]  
**Sent:** 05 July 2021 15:00  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 205318  
**Attachments:** L001\_ST9\_Land\_North\_of\_Haxby\_Haxby.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

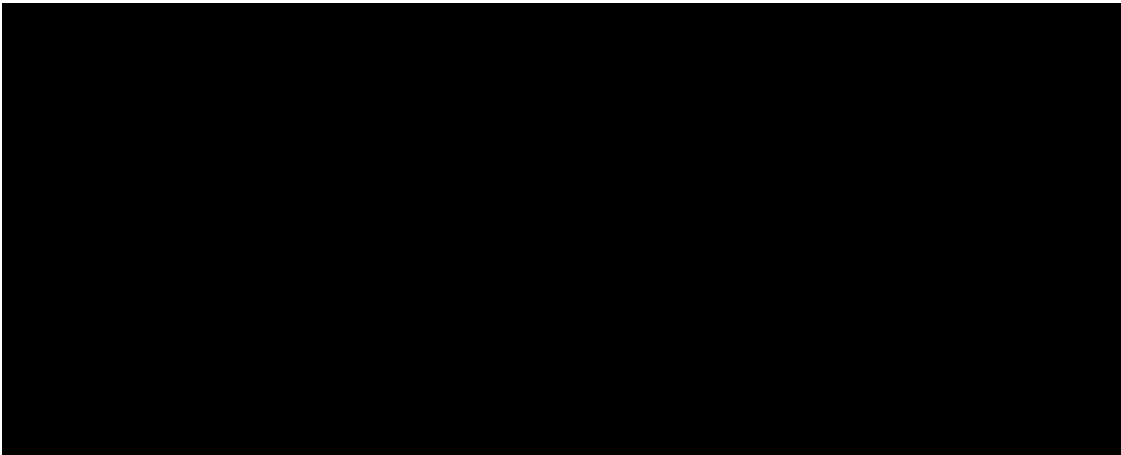
---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details



---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Strategic Housing Land Availability Assessment Update (April 2021) (EX/CYC/56)

---

## Your comments: Legal Compliance of the document



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

**Please justify why you consider the document to be legally compliant:** See attached letter

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** See attached letter

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** See attached letter

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** N/A

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** To elaborate upon attached letter

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

L001\_ST9\_Land\_North\_of\_Haxby\_Haxby.pdf

---



Local Plan  
City of York Council  
West Offices  
Station Rise  
York  
YO61 6GA



Ref: 1198LE

Date: 29<sup>th</sup> June 2021

Dear Sir / Madam,

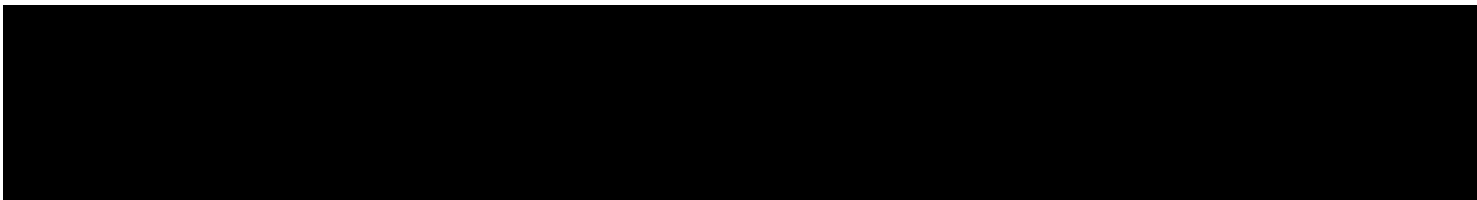
RE: COMMENTS ON THE CITY OF YORK LOCAL PLAN PROPOSED MODIFICATIONS (27<sup>TH</sup> MAY TO 7<sup>TH</sup> JULY), IN RELATION TO LAND NORTH OF HAXBY, HAXBY (STRATEGIC HOUSING SITE REF: ST9).

## Introduction

This submission is made on behalf of Vistry Homes (“the Developer”) and should be read in conjunction with the various detailed representations submitted to the City of York Council (“the Council”), throughout the plan making process in relation to the land referenced as ST9 (“the Site”). The representations previously submitted by DPP in support of the draft allocation of the strategic housing site known as ST9 confirmed that the Site is available and suitable for housing development, and that residential development is achievable.

The Developer wishes to **support** the draft allocation of the Site within the emerging Local Plan. The Developer is of the view that the Site does not materially fulfil any of the purposes of the Green Belt around York, when reassessed using the Council’s clarified methodology. The Developer also wishes to reiterate that the allocation of the Site in the emerging Local Plan is crucial in ensuring the Council are able to meet the housing requirement cited in the emerging Local Plan, taking into account the GL Hearn Housing Needs Update September 2020, and the SHLAA Update (April 2021).

These comments are made in respect of the following documents:

- Topic Paper TP1 Approach to defining York's Green Belt Addendum March 2021
  - Topic Paper 1 Green Belt Addendum January 2021 Annex 4: Other Densely Developed Areas in the General Extent of the Green Belt
  - Topic Paper 1 Green Belt Addendum January 2021 Annex 6: Proposed Modifications
  - Topic Paper 1 Green Belt Addendum January 2021 Annex 7: Housing Supply Update
  - GL Hearn Housing Needs Update (September 2020)
  - SHLAA Update (April 2021)
- 



## Background

By way of brief background information, the Council launched a third Regulation 19 consultation concerning the City of York Local Plan in May 2021. The consultation concerns various documents comprising the requested Composite Proposed Modifications Schedule. The documents in question have been prepared by the Council in response to a number of issues raised by the Inspectors during and following the Phase 1 hearings sessions which took place in December of 2019.

In terms of the Site, ST9 was assessed as part of the Council's site selection methodology and was deemed suitable and appropriate for development and did not need to be kept permanently open. The Site was subsequently included as a housing allocation in the Local Plan Preferred Options Draft (2013), Publication Draft Local Plan (2014), Local Plan Preferred Sites Consultation (2016) and the Local Plan Publication Draft (2018). The suitability and appropriateness of the Site for housing development has therefore never been in question.

Throughout the various iterations of the emerging Local Plan, the Council have remained satisfied that residential development on the Site is suitable, that development is achievable, and that the Site is available. The Council have also remained satisfied that the Site does not perform an important Green Belt purpose and that the proposed Green Belt boundaries are appropriate. Overall, the Council remain satisfied that the Site does not need to remain permanently open. The Developer agrees with the Council's position.

The principle of allocating the Site for housing development within the emerging Local Plan remains firmly established. Consequently, the Developer **supports** the continued allocation of ST9 within the emerging Local Plan.

## The Test of Soundness

Paragraph 35 of the NPPF indicates that a Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound". In order to be sound, NPPF confirms that a plan should be:

*a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs<sup>19</sup>; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

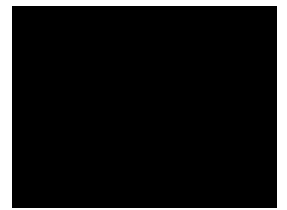
*b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) **Consistent** with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.*

It is against the above tests of soundness that the emerging Local Plan, including the proposed modifications, must be assessed.





## The Proposed Modifications

The Council have published a number of additional documents, devised to address concerns raised by the Inspectors during and following the Phase 1 hearings. Much of the work undertaken seeks to address concerns raised in relation to the methodology used by the Council to determine whether a parcel of land needs to be kept permanently open and the Green Belt boundaries.

To summarise the documents submitted, the Council have published an addendum paper, *Topic Paper 1 Approach to defining Green Belt Addendum January 2021*, ('the TP1 Addendum 2021') which seeks to update the original Topic Paper 1: Approach to the Green Belt (2018) in three key respects. First, the TP1 Addendum 2021 seeks to address the various issues which arose during the Phase 1 hearings. Secondly, the TP1 Addendum 2021 confirms that, in the opinion of the Council, the latest household projects will not have any implications in terms of the permanence of the boundaries. Finally, the TP1 Addendum 2021 seeks to address the significant concerns raised by the Inspectors concerning the methodology used by the Council in establishing the Green Belt boundaries.

Annex 4 of the TP1 Addendum 2021 contains the local level assessment of the boundaries surrounding developed areas within the Green Belt, including Haxby.

Annex 6 of the TP1 Addendum 2021 outlines the proposed amendments to the Green Belt boundaries as a result of the revisions to the methodology. No fundamental alterations are proposed, and none which directly concern the Site.

Annex 7 of the TP1 Addendum 2021 (Housing Supply Update) seeks to demonstrate that the proposed Green Belt boundaries will endure through the plan period of the emerging Local Plan and beyond, taking into account the GL Hearn Housing Needs Update September 2020, and the SHLAA update (2021). Both of these documents are also the subject of the consultation.

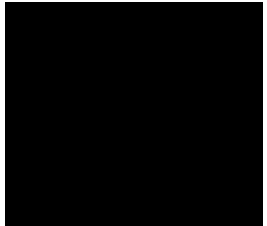
Otherwise, a number of other supporting documentation and key evidence has been published by the Council, which are also the subject of the current consultation exercise. The additional documents include an updated Habitats Regulation Assessment, and other pieces of new evidence.

## Comments and Observations on the Proposed Modifications

### Green Belt

As outlined in the TP1 Addendum 2021, the Council have sought to address the concerns raised by the Inspectors relating to the methodology used by the Council to determine whether a parcel of land needs to be kept permanently open and the Green Belt boundaries. To summarise, the Inspectors have expressed concern that the criteria (referred to as 'Shapers') used by the Council to assess sites against the five purposes of Green Belt outlined in paragraph 134 were of little relevance to issues of Green Belt.

To address this issue, the TP1 Addendum 2021 outlines how the land within the proposed Green Belt has been assessed as well as the proposed inner and outer boundaries of the Green Belt, using additional criteria to ensure that the proposed Green Belt fulfils the purposes listed in NPPF, with particular emphasis on purposes 1, 3 and 4. The criteria in question draws on evidence and work previously undertaken by the Council. The five new criteria are as follows:

- 
- *Urban Sprawl*
  - *Encroachment*
  - *Compactness*
  - *Landmark Monuments*
  - *Landscape and Setting*

The first criterion has been introduced to assess whether land fulfils purpose 1 of Green Belt (to check the unrestricted sprawl of large built-up areas). The second is used to assess land against purpose 3 (to assist in safeguarding the countryside from encroachment). The remaining three criteria are used to assess whether land fulfils the fourth purpose of Green Belt (to preserve the setting and special character of historic towns).

We feel that the revised methodology aligns more closely with the purposes of including land within the Green Belt, although we still have some concerns. Notwithstanding these concerns, it is clear that the Site does not materially contribute to any of the purposes of including land within the Green Belt, as set out in the TP1 Addendum 2021. Therefore, the allocation of ST9 remains appropriate, as acknowledged by the Council.

For completeness we have assessed the Site against the revised methodology below:

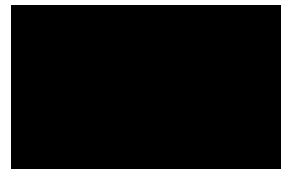
**Urban Sprawl:** The Council are content that the Site will not result in urban sprawl – the Site falls adjacent to the village Haxby, which is not a large urban area. Nevertheless, the Site is well contained by development, trees and hedgerows and there are limited views into the Site. The Site is comprised of a number of long linear fields divided by hedgerows, trees and drainage ditches. It does not have a sense of openness although it is open. The boundaries of the Site are established and clear and provide a logical edge to Haxby. The development of the Site would therefore be restricted and would not result in sprawl.

**Encroachment:** The Site is in the countryside however the character of the Site is not one of open fields with extensive views across it to the City of York and nor is there public access across it. Annex 4 of the TP1 Addendum notes that there are existing pockets of ribbon development located on Moor Lane, which the Site encompasses. This serves to reduce the extent by which the Site is extending into the countryside.

**Compactness:** As the proposed allocation adjoins the settlement of Haxby on its northern side and as such the development of the Site will not undermine the perception of the compact form of the City of York. Haxby is a relatively large settlement and the development of ST9 is a logical extension of this sustainable settlement which will reinforce the perception of the compactness of Haxby. Further, given the location of the Site, the development of this land will not lead to Haxby coalescing with any settlement, not least the City of York.

The development of the Site will not affect the relation between the City of York and the surrounding ring of villages, and it will not affect the strays, Ings and green wedges or the open approaches to the city.

**Landmark Monuments:** Haxby Conservation Area is situated in the centre of the village, a considerable distance from the Site itself, and is separated from the Site by relatively modern suburban housing. There are no other heritage assets in the vicinity of the Site. The City of York is situated to the south of the village and is not visible from within the Site. When traveling around the ring road the Site is not visible. Further, we would not describe Haxby Road as an open approach



into the City as it travels through Haxby itself. Nevertheless, when approaching the City of York, via Haxby Road, the Site is seen against the backdrop of Haxby which does not compromise the setting of York.

**Landscape Setting:** Given the location of the Site to the north of Haxby the land does not aid the understanding of the historical relationship of York to its rural hinterland. When travelling around York it retains the perception of a City within a rural setting. The Site does not lie within any of the strays, Ings, river corridors or green wedges which we agree are important to the special character of the City of York.

The Council have concluded that the Site does not serve any important purposes for the inclusion of land within the Green Belt when assessed against these criteria in the revised TP1 Addendum 2021. More specifically, the Council have confirmed that the Site lies outside the extent of land specifically identified by the evidence base as being important for maintaining the historic character and setting of York. Equally, they confirm that Site does not fall within an area which needs to remain open to aid the perception of the compactness of the City of York or its rural setting.

The Developer continues to **support** the conclusions reached by the Council and **supports** the allocation of the Site in the emerging Local Plan and the conclusions reached in the TP1 Addendum 2021 and the associated evidence base regarding ST9.

## Boundaries

The Developer also **supports** the settlement limits and Green Belt boundary as proposed within the emerging Local Plan. In particular, the northernmost boundary is a clear and logical edge to the settlement. From Moor Lane, the boundary runs northward, with the adopted highway providing a clear physical edge. The boundary subsequently moves eastwards towards Usher Lane, encompassing the Site. The northern boundary of the Site follows established field boundaries, comprised of trees, hedgerow and drainage ditches. On the east side the boundary follows Usher Lane. The boundary is sufficiently permanent and is clearly distinguishable. It provides a recognisable and logical edge to the settlement, and ensures that the settlement, and open countryside to the north remain distinct and separate. The Developer is of the view that the use of such a strong and clear boundary will ensure the Council are able to prevent unrestricted sprawl and encroachment into the countryside. The Developer **supports** the Green Belt boundary in this location.

The Developer **supports** the Green Belt boundary in this location.

## Housing Need

The consultation also concerns the GL Hearn Housing Needs Update (September 2020), and the SHLAA Update (April 2021). Within the former document, GL Hearn report that the housing requirement of 790 dpa identified within the Housing Need Update 2019 remains an appropriate figure, given that the need for housing in the city has not materially changed. The Council therefore continue to use a housing requirement of 822 dwellings per annum, first cited within the Proposed Modifications Consultation (2019). This is based upon a revised OAN of 790 dwellings per annum, plus a further 32 dwellings per annum to account for a shortfall in completions between 2012-2017.

The Developer does not wish to comment specifically on the OAN calculation used by the Council. However, they do wish to reiterate the importance of the Site's allocation in ensuring that the Council are able to achieve the delivery trajectory outlined within the SHLAA Update, and in meeting the housing requirement identified in the GL Hearn report. As noted within the SHLAA Update 2021, the Site will contribute approximately 665 dwellings within the Plan Period. The





Developer is content that the development of the Site will deliver in excess of the requisite volume of units cited in the SHLAA and remains confident that the vast majority of dwellings can be delivered within the Plan Period. The Developer is content that the development of the Site will deliver the much-needed new dwellings envisaged and remains confident that completion of the Site can be achieved within the short term. The Developer is a top 5 housebuilder (rather than simply a land promotor) with a strong track record of delivering both market and affordable homes.

The Developer continues to **Support** as a draft allocation. The Developer remains committed to the development of the Site, which remains available, suitable and deliverable. The Developer also supports the estimated development capacity of the Site and confirms that this can be delivered in the plan period.

**Other Matters**

The Developer has no comment to make in relation to the remaining documents currently the subject of the ongoing consultation.

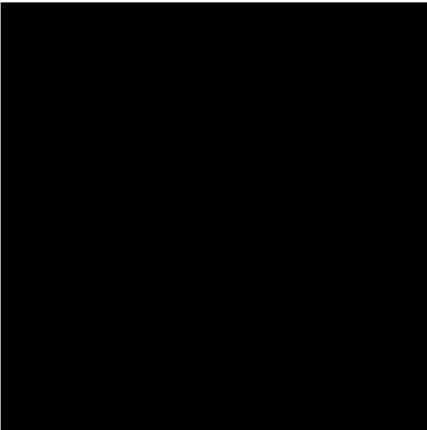
**Compliance with the Test of Soundness**

Having considered the updated and additional information relating to the Council’s methodology to determine; whether land needs to be kept permanently open and included in the Green Belt, and the delineation of appropriate Green Belt boundaries, it is clear that the Site remains suitable as a housing allocation, that the Site does not need to be kept permanently open and that the Green Belt boundaries are appropriate. The Developer supports the assessment of the Site and the conclusion reached regarding it. In this respect, the Developer is of the view that the Local Plan has been **positively prepared**, and that the allocation of Site ST9 is **deliverable, justified and consistent** with NPPF.

The GL Hearn Housing Needs Update 2020, and the SHLAA Update 2021 serve to underline the importance of the Site in enabling the Council to deliver housing within the plan period. The Council have accepted that ST9 is available and that the Site is suitable for residential development, and it can be delivered.

The Developer therefore wholly **supports** the allocation known as ST9. The Developer also **supports** the estimated development capacity of the Site and confirm that this can be delivered within the plan period.

Yours sincerely,



**From:** [REDACTED]  
**Sent:** 05 July 2021 14:56  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 205315  
**Attachments:** L001\_ST9\_Land\_North\_of\_Haxby\_Haxby.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Housing Needs Update September 2020 (EX/CYC/43a)

---

## Your comments: Legal Compliance of the document

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

**Please justify why you consider the document to be legally compliant:** See attached letter

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** See attached letter

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** See attached letter

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** N/A

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** To elaborate upon attached letter

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

L001\_ST9\_Land\_North\_of\_Haxby\_Haxby.pdf

---





Local Plan  
City of York Council  
West Offices  
Station Rise  
York  
YO61 6GA

Ref: 1198LE

Date: 29<sup>th</sup> June 2021

Dear Sir / Madam,

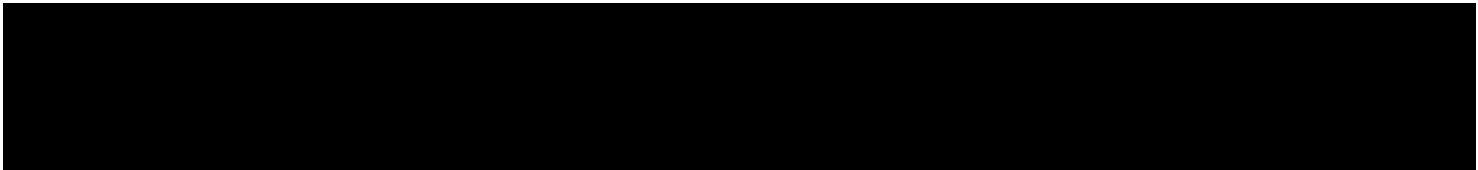
RE: COMMENTS ON THE CITY OF YORK LOCAL PLAN PROPOSED MODIFICATIONS (27<sup>TH</sup> MAY TO 7<sup>TH</sup> JULY), IN RELATION TO LAND NORTH OF HAXBY, HAXBY (STRATEGIC HOUSING SITE REF: ST9).

## Introduction

This submission is made on behalf of Vistry Homes (“the Developer”) and should be read in conjunction with the various detailed representations submitted to the City of York Council (“the Council”), throughout the plan making process in relation to the land referenced as ST9 (“the Site”). The representations previously submitted by DPP in support of the draft allocation of the strategic housing site known as ST9 confirmed that the Site is available and suitable for housing development, and that residential development is achievable.

The Developer wishes to **support** the draft allocation of the Site within the emerging Local Plan. The Developer is of the view that the Site does not materially fulfil any of the purposes of the Green Belt around York, when reassessed using the Council’s clarified methodology. The Developer also wishes to reiterate that the allocation of the Site in the emerging Local Plan is crucial in ensuring the Council are able to meet the housing requirement cited in the emerging Local Plan, taking into account the GL Hearn Housing Needs Update September 2020, and the SHLAA Update (April 2021).

These comments are made in respect of the following documents:

- Topic Paper TP1 Approach to defining York's Green Belt Addendum March 2021
  - Topic Paper 1 Green Belt Addendum January 2021 Annex 4: Other Densely Developed Areas in the General Extent of the Green Belt
  - Topic Paper 1 Green Belt Addendum January 2021 Annex 6: Proposed Modifications
  - Topic Paper 1 Green Belt Addendum January 2021 Annex 7: Housing Supply Update
  - GL Hearn Housing Needs Update (September 2020)
  - SHLAA Update (April 2021)
- 



## Background

By way of brief background information, the Council launched a third Regulation 19 consultation concerning the City of York Local Plan in May 2021. The consultation concerns various documents comprising the requested Composite Proposed Modifications Schedule. The documents in question have been prepared by the Council in response to a number of issues raised by the Inspectors during and following the Phase 1 hearings sessions which took place in December of 2019.

In terms of the Site, ST9 was assessed as part of the Council's site selection methodology and was deemed suitable and appropriate for development and did not need to be kept permanently open. The Site was subsequently included as a housing allocation in the Local Plan Preferred Options Draft (2013), Publication Draft Local Plan (2014), Local Plan Preferred Sites Consultation (2016) and the Local Plan Publication Draft (2018). The suitability and appropriateness of the Site for housing development has therefore never been in question.

Throughout the various iterations of the emerging Local Plan, the Council have remained satisfied that residential development on the Site is suitable, that development is achievable, and that the Site is available. The Council have also remained satisfied that the Site does not perform an important Green Belt purpose and that the proposed Green Belt boundaries are appropriate. Overall, the Council remain satisfied that the Site does not need to remain permanently open. The Developer agrees with the Council's position.

The principle of allocating the Site for housing development within the emerging Local Plan remains firmly established. Consequently, the Developer **supports** the continued allocation of ST9 within the emerging Local Plan.

## The Test of Soundness

Paragraph 35 of the NPPF indicates that a Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound". In order to be sound, NPPF confirms that a plan should be:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs<sup>19</sup>; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) **Consistent** with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.*

It is against the above tests of soundness that the emerging Local Plan, including the proposed modifications, must be assessed.



## The Proposed Modifications

The Council have published a number of additional documents, devised to address concerns raised by the Inspectors during and following the Phase 1 hearings. Much of the work undertaken seeks to address concerns raised in relation to the methodology used by the Council to determine whether a parcel of land needs to be kept permanently open and the Green Belt boundaries.

To summarise the documents submitted, the Council have published an addendum paper, *Topic Paper 1 Approach to defining Green Belt Addendum January 2021*, ('the TP1 Addendum 2021') which seeks to update the original Topic Paper 1: Approach to the Green Belt (2018) in three key respects. First, the TP1 Addendum 2021 seeks to address the various issues which arose during the Phase 1 hearings. Secondly, the TP1 Addendum 2021 confirms that, in the opinion of the Council, the latest household projects will not have any implications in terms of the permanence of the boundaries. Finally, the TP1 Addendum 2021 seeks to address the significant concerns raised by the Inspectors concerning the methodology used by the Council in establishing the Green Belt boundaries.

Annex 4 of the TP1 Addendum 2021 contains the local level assessment of the boundaries surrounding developed areas within the Green Belt, including Haxby.

Annex 6 of the TP1 Addendum 2021 outlines the proposed amendments to the Green Belt boundaries as a result of the revisions to the methodology. No fundamental alterations are proposed, and none which directly concern the Site.

Annex 7 of the TP1 Addendum 2021 (Housing Supply Update) seeks to demonstrate that the proposed Green Belt boundaries will endure through the plan period of the emerging Local Plan and beyond, taking into account the GL Hearn Housing Needs Update September 2020, and the SHLAA update (2021). Both of these documents are also the subject of the consultation.

Otherwise, a number of other supporting documentation and key evidence has been published by the Council, which are also the subject of the current consultation exercise. The additional documents include an updated Habitats Regulation Assessment, and other pieces of new evidence.

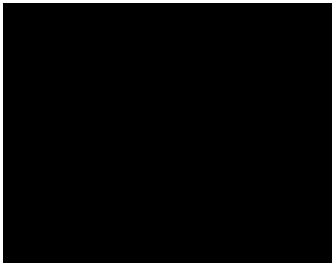
## Comments and Observations on the Proposed Modifications

### Green Belt

As outlined in the TP1 Addendum 2021, the Council have sought to address the concerns raised by the Inspectors relating to the methodology used by the Council to determine whether a parcel of land needs to be kept permanently open and the Green Belt boundaries. To summarise, the Inspectors have expressed concern that the criteria (referred to as 'Shapers') used by the Council to assess sites against the five purposes of Green Belt outlined in paragraph 134 were of little relevance to issues of Green Belt.

To address this issue, the TP1 Addendum 2021 outlines how the land within the proposed Green Belt has been assessed as well as the proposed inner and outer boundaries of the Green Belt, using additional criteria to ensure that the proposed Green Belt fulfils the purposes listed in NPPF, with particular emphasis on purposes 1, 3 and 4. The criteria in question draws on evidence and work previously undertaken by the Council. The five new criteria are as follows:



- 
- *Urban Sprawl*
  - *Encroachment*
  - *Compactness*
  - *Landmark Monuments*
  - *Landscape and Setting*

The first criterion has been introduced to assess whether land fulfils purpose 1 of Green Belt (to check the unrestricted sprawl of large built-up areas). The second is used to assess land against purpose 3 (to assist in safeguarding the countryside from encroachment). The remaining three criteria are used to assess whether land fulfils the fourth purpose of Green Belt (to preserve the setting and special character of historic towns).

We feel that the revised methodology aligns more closely with the purposes of including land within the Green Belt, although we still have some concerns. Notwithstanding these concerns, it is clear that the Site does not materially contribute to any of the purposes of including land within the Green Belt, as set out in the TP1 Addendum 2021. Therefore, the allocation of ST9 remains appropriate, as acknowledged by the Council.

For completeness we have assessed the Site against the revised methodology below:


**Urban Sprawl:** The Council are content that the Site will not result in urban sprawl – the Site falls adjacent to the village Haxby, which is not a large urban area. Nevertheless, the Site is well contained by development, trees and hedgerows and there are limited views into the Site. The Site is comprised of a number of long linear fields divided by hedgerows, trees and drainage ditches. It does not have a sense of openness although it is open. The boundaries of the Site are established and clear and provide a logical edge to Haxby. The development of the Site would therefore be restricted and would not result in sprawl.

**Encroachment:** The Site is in the countryside however the character of the Site is not one of open fields with extensive views across it to the City of York and nor is there public access across it. Annex 4 of the TP1 Addendum notes that there are existing pockets of ribbon development located on Moor Lane, which the Site encompasses. This serves to reduce the extent by which the Site is extending into the countryside.

**Compactness:** As the proposed allocation adjoins the settlement of Haxby on its northern side and as such the development of the Site will not undermine the perception of the compact form of the City of York. Haxby is a relatively large settlement and the development of ST9 is a logical extension of this sustainable settlement which will reinforce the perception of the compactness of Haxby. Further, given the location of the Site, the development of this land will not lead to Haxby coalescing with any settlement, not least the City of York.

The development of the Site will not affect the relation between the City of York and the surrounding ring of villages, and it will not affect the strays, Ings and green wedges or the open approaches to the city.

**Landmark Monuments:** Haxby Conservation Area is situated in the centre of the village, a considerable distance from the Site itself, and is separated from the Site by relatively modern suburban housing. There are no other heritage assets in the vicinity of the Site. The City of York is situated to the south of the village and is not visible from within the Site. When traveling around the ring road the Site is not visible. Further, we would not describe Haxby Road as an open approach



into the City as it travels through Haxby itself. Nevertheless, when approaching the City of York, via Haxby Road, the Site is seen against the backdrop of Haxby which does not compromise the setting of York.

**Landscape Setting:** Given the location of the Site to the north of Haxby the land does not aid the understanding of the historical relationship of York to its rural hinterland. When travelling around York it retains the perception of a City within a rural setting. The Site does not lie within any of the strays, Ings, river corridors or green wedges which we agree are important to the special character of the City of York.

The Council have concluded that the Site does not serve any important purposes for the inclusion of land within the Green Belt when assessed against these criteria in the revised TP1 Addendum 2021. More specifically, the Council have confirmed that the Site lies outside the extent of land specifically identified by the evidence base as being important for maintaining the historic character and setting of York. Equally, they confirm that Site does not fall within an area which needs to remain open to aid the perception of the compactness of the City of York or its rural setting.

The Developer continues to **support** the conclusions reached by the Council and **supports** the allocation of the Site in the emerging Local Plan and the conclusions reached in the TP1 Addendum 2021 and the associated evidence base regarding ST9.

## Boundaries

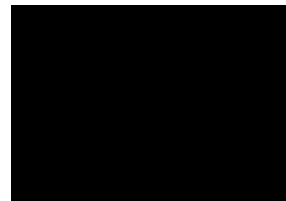
The Developer also **supports** the settlement limits and Green Belt boundary as proposed within the emerging Local Plan. In particular, the northernmost boundary is a clear and logical edge to the settlement. From Moor Lane, the boundary runs northward, with the adopted highway providing a clear physical edge. The boundary subsequently moves eastwards towards Usher Lane, encompassing the Site. The northern boundary of the Site follows established field boundaries, comprised of trees, hedgerow and drainage ditches. On the east side the boundary follows Usher Lane. The boundary is sufficiently permanent and is clearly distinguishable. It provides a recognisable and logical edge to the settlement, and ensures that the settlement, and open countryside to the north remain distinct and separate. The Developer is of the view that the use of such a strong and clear boundary will ensure the Council are able to prevent unrestricted sprawl and encroachment into the countryside. The Developer **supports** the Green Belt boundary in this location.

The Developer **supports** the Green Belt boundary in this location.

## Housing Need

The consultation also concerns the GL Hearn Housing Needs Update (September 2020), and the SHLAA Update (April 2021). Within the former document, GL Hearn report that the housing requirement of 790 dpa identified within the Housing Need Update 2019 remains an appropriate figure, given that the need for housing in the city has not materially changed. The Council therefore continue to use a housing requirement of 822 dwellings per annum, first cited within the Proposed Modifications Consultation (2019). This is based upon a revised OAN of 790 dwellings per annum, plus a further 32 dwellings per annum to account for a shortfall in completions between 2012-2017.

The Developer does not wish to comment specifically on the OAN calculation used by the Council. However, they do wish to reiterate the importance of the Site's allocation in ensuring that the Council are able to achieve the delivery trajectory outlined within the SHLAA Update, and in meeting the housing requirement identified in the GL Hearn report. As noted within the SHLAA Update 2021, the Site will contribute approximately 665 dwellings within the Plan Period. The



Developer is content that the development of the Site will deliver in excess of the requisite volume of units cited in the SHLAA and remains confident that the vast majority of dwellings can be delivered within the Plan Period. The Developer is content that the development of the Site will deliver the much-needed new dwellings envisaged and remains confident that completion of the Site can be achieved within the short term. The Developer is a top 5 housebuilder (rather than simply a land promotor) with a strong track record of delivering both market and affordable homes.

The Developer continues to **Support** as a draft allocation. The Developer remains committed to the development of the Site, which remains available, suitable and deliverable. The Developer also supports the estimated development capacity of the Site and confirms that this can be delivered in the plan period.

## Other Matters

The Developer has no comment to make in relation to the remaining documents currently the subject of the ongoing consultation.

## Compliance with the Test of Soundness

Having considered the updated and additional information relating to the Council's methodology to determine; whether land needs to be kept permanently open and included in the Green Belt, and the delineation of appropriate Green Belt boundaries, it is clear that the Site remains suitable as a housing allocation, that the Site does not need to be kept permanently open and that the Green Belt boundaries are appropriate. The Developer supports the assessment of the Site and the conclusion reached regarding it. In this respect, the Developer is of the view that the Local Plan has been **positively prepared**, and that the allocation of Site ST9 is **deliverable, justified and consistent** with NPPF.

The GL Hearn Housing Needs Update 2020, and the SHLAA Update 2021 serve to underline the importance of the Site in enabling the Council to deliver housing within the plan period. The Council have accepted that ST9 is available and that the Site is suitable for residential development, and it can be delivered.

The Developer therefore wholly **supports** the allocation known as ST9. The Developer also **supports** the estimated development capacity of the Site and confirm that this can be delivered within the plan period.

Yours sincerely,

