



City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES

DATA TRENDS

INDIVIDUAL RESPONSES

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Respondent #420 ▼



COMPLETE

Started: Monday, March 27, 2023 7:39:52 PM
Last Modified: Monday, March 27, 2023 7:43:56 PM
Time Spent: 00:04:04
IP Address: 86.174.255.188

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Alice Ingram

Q3

Contact details: Please provide email and/or address

Organisation (optional) WNY Chamber of Commerce

Address Devere House

Address 2 Vicar Lane, Little Germany

City/town Bradford

Post code BD1 5AH

Email address

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council? If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link

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459 responses



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Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.1 Policy SS1: Delivering Sustainable Growth for York

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

understated with a lack of allocation - see supporting doc

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Modification Ref: MM4.2; MM4.3; MM4.4

Housing Land Provision

Modification Ref: MM3.1; MM3.2; MM3.3; MM3.4

The property forum responding on behalf of the Chamber of Commerce for York and North Yorkshire strongly believes that York urgently needs a local plan. As expressed in our representations going back over many years, we have significant concerns about the current draft local plan. In particular, we believe that the housing requirement is understated and that there is a lack of allocation of employment land which will seriously impede the City of York's economic strategy to promote growth. We are already 7 years into the plan period during most of which time there has been a failure to deliver the required housing supply. This is highlighted by the Council's own housing trajectory in EX_CYC_107_1 which identified an undersupply of housing against requirement for the 5 years 2019/20 to 2023/24. We also note that the housing trajectory identifies completion on some sites in the current year 2023/24. We would ask the Inspector to consider whether those completions are likely to occur. (As a representative organisation the Chamber cannot make comment on specific sites.)

This shortfall in the early years of the Plan not only means that housing needs in general are unmet, but, more significantly, affordable housing needs are also not properly catered for (on the basis that a significant proportion of affordable housing delivery is secured through Section 106 agreements on general market housing).

Employment Land Provision

Modification Ref: MM4.2; MM4.3; MM4.4

We attach more detailed comments on the Employment Land allocation which highlights our concerns that there is insufficient land allocated. Much of what there is in York Central, which incredibly welcome, is inevitably a long term delivery and likely to be for high quality offices rather than the sort of space for start ups and small businesses to expand or light industrial type uses.

Conclusion

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Yours sincerely



Mark Casci
Head of Business Representation



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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES

DATA TRENDS

INDIVIDUAL RESPONSES

All Pages ▼

Respondent #421 ▼



COMPLETE

Started: Monday, March 27, 2023 7:43:56 PM
Last Modified: Monday, March 27, 2023 7:45:18 PM
Time Spent: 00:01:21
IP Address: 86.174.255.188

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Alice Ingram

Q3

Contact details: Please provide email and/or address

Organisation (optional) WNY Chamber of Commerce

Address Devere House

Address 2 Vicar Lane, Little Germany

City/town Bradford

Post code BD1 5AH

Email address [REDACTED]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council? If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link

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459 responses



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Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.2 Policy SS1 explanation - new paragraphs

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

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Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

see attached document

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Modification Ref: MM4.2; MM4.3; MM4.4

Housing Land Provision

Modification Ref: MM3.1; MM3.2; MM3.3; MM3.4

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Employment Land Provision

Modification Ref: MM4.2; MM4.3; MM4.4

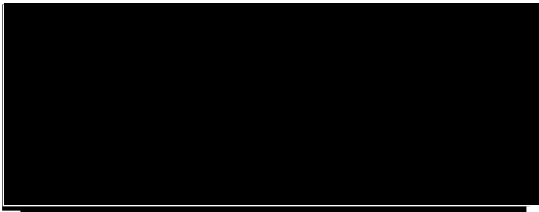
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Yours sincerely



Mark Casci
Head of Business Representation



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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES

DATA TRENDS

INDIVIDUAL RESPONSES

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Respondent #423 ▼



COMPLETE

Started: Monday, March 27, 2023 7:45:18 PM
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Time Spent: 00:02:07
IP Address: 86.174.255.188

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Alice Ingram

Q3

Contact details: Please provide email and/or address

Organisation (optional) WNY Chamber of Commerce

Address Devere House

Address 2 Vicar Lane, Little Germany

City/town Bradford

Post code BD1 5AH

Email address [REDACTED]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council? If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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459 responses



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Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.3 Key Diagram

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

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Not effective - i.e. it won't work

Q24

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see attached document

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Modification Ref: MM4.2; MM4.3; MM4.4

Housing Land Provision

Modification Ref: MM3.1; MM3.2; MM3.3; MM3.4

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Employment Land Provision

Modification Ref: MM4.2; MM4.3; MM4.4

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Yours sincerely



Mark Casci
Head of Business Representation



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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES

DATA TRENDS

INDIVIDUAL RESPONSES

All Pages ▼

Respondent #425 ▼



COMPLETE

Started: Monday, March 27, 2023 7:47:26 PM
Last Modified: Monday, March 27, 2023 7:49:08 PM
Time Spent: 00:01:41
IP Address: 86.174.255.188

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Alice Ingram

Q3

Contact details: Please provide email and/or address

Organisation (optional) WNY Chamber of Commerce

Address Devere House

Address 2 Vicar Lane, Little Germany

City/town Bradford

Post code BD1 5AH

Email address [REDACTED]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council? If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link

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459 responses



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Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.4 Table 1a and 1b (housing supply and distribution)

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

Plan will lead to an undersupply of housing against requirement. See doc attached

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Modification Ref: MM4.2; MM4.3; MM4.4

Housing Land Provision

Modification Ref: MM3.1; MM3.2; MM3.3; MM3.4

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Employment Land Provision

Modification Ref: MM4.2; MM4.3; MM4.4

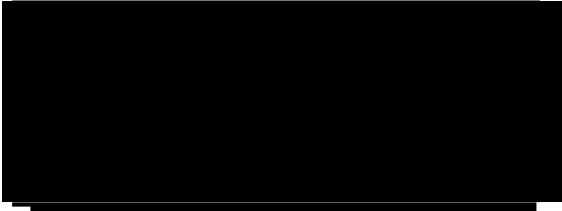
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Yours sincerely



Mark Casci
Head of Business Representation



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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES

DATA TRENDS

INDIVIDUAL RESPONSES

All Pages ▼

Respondent #432 ▼



COMPLETE

Started: Monday, March 27, 2023 7:50:21 PM
Last Modified: Monday, March 27, 2023 7:56:06 PM
Time Spent: 00:05:45
IP Address: 86.174.255.188

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Alice Ingram

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Contact details: Please provide email and/or address

Organisation (optional) WNY Chamber of Commerce

Address Devere House

Address 2 Vicar Lane, Little Germany

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Post code BD1 5AH

Email address [REDACTED]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council? If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link

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459 responses



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Q6

To which section does this response relate?

Section 4: Economy and Retail

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

MM4.2 Policy EC1 Provision of Employment Land

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

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Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

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Respondent skipped this question

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

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Respondent skipped this question

Page 16: Section 14: Transport and Communications

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To which modification does this response relate?

Respondent skipped this question

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To which modification does this response relate?

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Page 19: New evidence documents

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To which evidence document does this response relate?

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Page 20: Comment Form

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lack of allocation - see supporting doc

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Modification Ref: MM4.2; MM4.3; MM4.4

Housing Land Provision

Modification Ref: MM3.1; MM3.2; MM3.3; MM3.4

The property forum responding on behalf of the Chamber of Commerce for York and North Yorkshire strongly believes that York urgently needs a local plan. As expressed in our representations going back over many years, we have significant concerns about the current draft local plan. In particular, we believe that the housing requirement is understated and that there is a lack of allocation of employment land which will seriously impede the City of York's economic strategy to promote growth. We are already 7 years into the plan period during most of which time there has been a failure to deliver the required housing supply. This is highlighted by the Council's own housing trajectory in EX_CYC_107_1 which identified an undersupply of housing against requirement for the 5 years 2019/20 to 2023/24. We also note that the housing trajectory identifies completion on some sites in the current year 2023/24. We would ask the Inspector to consider whether those completions are likely to occur. (As a representative organisation the Chamber cannot make comment on specific sites.)

This shortfall in the early years of the Plan not only means that housing needs in general are unmet, but, more significantly, affordable housing needs are also not properly catered for (on the basis that a significant proportion of affordable housing delivery is secured through Section 106 agreements on general market housing).

Employment Land Provision

Modification Ref: MM4.2; MM4.3; MM4.4

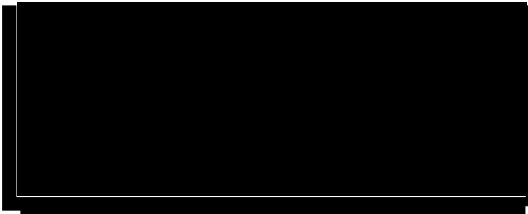
We attach more detailed comments on the Employment Land allocation which highlights our concerns that there is insufficient land allocated. Much of what there is in York Central, which incredibly welcome, is inevitably a long term delivery and likely to be for high quality offices rather than the sort of space for start ups and small businesses to expand or light industrial type uses.

Conclusion

Given the time that has elapsed on the York local plan so far we conclude that the sensible thing is for the plan to be approved so that development can take place in the sound framework. However, we would urge very strongly that the inspectors do whatever they can to require that York's Local Plan is subject to an early, if not immediate review. This is because so much has changed since the evidence base for the current plan was put together. The economic position, impacts of Covid, the impending devolution deal with North Yorkshire. The list could go on. So whilst we want to see a plan in place we need to know that it will be updated in the not too distant future in particular to work with colleagues across the new combined authority to ensure that there is a consistent plan for the York/ North Yorkshire sub-region. The city cannot afford to wait another 60+ years for a properly up to date local plan!

In suggesting this approach, our biggest concern is that this local plan will set the Green Belt boundaries in place. We have significant concerns that insufficient land has been set aside for the city's future growth, and that once the plan is in place, it will be very difficult to amend these boundaries. If there is any opportunity to insist on safeguarded land before the plan is approved, we would urge that the inspectors do this.

Yours sincerely



Mark Casci
Head of Business Representation

City of York Local Plan Modifications Consultation 2023

Consolidated Main Modifications (January 2023) - Modification Ref. MM4.2 on Policy EC1: Provision of Employment Land

- 1.1 Policy EC1 relates to provision of employment land required to meet York's Sustainable Growth needs and accommodate an annual provision of around 650 new jobs as set out in Policy SS1 of the Plan.
- 1.2 The Policy sets out the Plan's approach to in relation to its overall forecast for jobs and how this has been
"disaggregated into the different economic sectors and converted into floorspace requirements using widely recognised job density and plot ratio assumptions"(para 4.6).
- 1.3 Overall, the Plan identifies a total requirement for around 38ha of new employment land to be provided across the plan period 2017-2032/33 with an additional five years to 2038 to ensure Green Belt permanence. The Employment Land Requirements are set out at Table 4.1 of Policy EC1, as below:

Table 4.1: Employment Land Requirements 2017-2038 (including 5% vacancy), Factoring in Change of Supply 2012-2017 and Including 2 Years Extra Supply, updated March 2022

Use Class	2021-33		2033-38		Total 2021-2038	
	Floorspace (m ²)	Land (Ha)	Floorspace (m ²)	Land (Ha)	Floorspace (m ²)	Land (Ha)
Office (formerly B1a)	137,588	15.5	12,310	2.1	149,898	17.6
Research & Development (B1b)	15,655	3.7	1,644	0.4	17,299	4.1
Light Industrial (formerly B1c)	11,218	1.9	1,435	0.4	12,653	2.3
General Industrial (B2)	0	0	0	0	0	0
Storage & Distribution B8	54,986	10.5	15,705	3.2	70,691	13.7
B Uses Sub Total	219,447	31.6	31,094	6.2*	250,541	37.7
D2	-17,887	-1.1	4,398	1.1	-13,489	0
Totals	201,560	30.5	35,492	7.2	237,052	37.7

1.4 To meet the identified need for new employment land, Policy EC1 lists five strategic and five non-strategic allocated sites at which provision is to be made for a range of employment uses. These are detailed in EC1 as follows:

Strategic Sites

Site	Floorspace (m ²)	Suitable Employment Uses
ST5: York Central	100,000	Office (E)
ST19: Land at Northminster Business Park (15ha)	49,500	Light Industrial (E), Industrial (B2) + Storage/Distribution (B8), + element of Office (E) in line with Policy SS23.
Campus East + ST27: University of York Expansion (21.2ha)*	40,000*	Knowledge based businesses (E)
ST26: Land South of Airfield Business Park, Elvington (7.6ha)	25,080	Research & Development (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8).
ST37: Whitehall Grange, Wigginton Road (10.1ha)	33,330	Storage/Distribution (B8).

*This is an approximate and indicative figure based on the University of York's predicted growth and may be reduced to accommodate other employment generating University uses identified in Policy ED1

Other Sites

Site	Floorspace (m ²)	Suitable Employment Uses
E9: Elvington Industrial Estate (1ha)	3,300	Research & Development (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8).
E10: Chessingham Park, Dunnington (0.24ha)	792	Light Industrial (E), Industrial (B2) + Storage/Distribution (B8).
E11: Annamine Nurseries. Jockey Lane (1ha)	3,300	Office (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8)
E16: Poppleton Garden Centre (2.8ha)	9,240	Light Industrial (E), Industrial (B2) + Storage/Distribution (B8). May also be suitable for element of Office (E)
E18: Towthorpe Lines, Strensall (4ha) *	13,200	Light Industrial (E), Industrial (B2) and Storage/Distribution (B8).

* Given the site's proximity to Strensall Common SAC (see explanatory text), this site must take account of Policy GI2a.

- 1.5 Policy EC1 therefore anticipates that the strategic employment allocations will provide a total floorspace of 247,910m², and that the non-strategic allocations will provide a further 29,832m². Overall, the allocations are expected to deliver a total 277,742m² of employment floorspace in context of an identified need of 237,052m² for the period 2017 to 2038 as set out at Table 4.1 of EC1.
- 1.6 Proposed Modification ref. MM4.2 states that the Council's amendments to Policy EC1 *"reflect the Status of Employment Allocations identified in Policy EC1 Note August 2022 (EX/CYC/107/7)"*.
- 1.7 However, there appears to be some key inconsistencies between Policy EC1 and Policy EX/CYC/107/7, which states that:
- **Strategic Site ST37 (Whitehall Grange) is not available for development** being subject of approvals and development for a car storage facility, with no capacity remaining for further development
 - **Non-Strategic Site E16 (Poppleton Garden Centre) is not available for development** being in use as a Garden Centre, on which basis *"the Council consider the land is no longer available for employment use"*(p. 17).
 - **Non-Strategic Site E10 (Chessingham Park) is fully developed**, having delivered 372m² of Class B2 floor space (as opposed to the 792m² identified in EC1) with no capacity remaining for future development.
- 1.8 In light of the above, and in order to fully *"reflect the Status of Employment Allocations identified in Policy EC1 Note August 2022 (EX/CYC/107/7)"*, its is questionable whether Sites ST37, E16 and E10 are genuinely available as part of the employment land supply. If they are not counted in the land supply the allocated sites will not meet the employment floorspace requirement of 237,052m² as identified in Table 4.1 of Policy EC1 as demonstrated the tables below.

Strategic Sites

Site	Floorspace (m ²)	Suitable Employment Uses
ST5: York Central	100,000	Office (E)
ST19: Land at Northminster Business Park (15ha)	49,500	Light Industrial (E), Industrial (B2) + Storage/Distribution (B8), + element of Office (E) in line with Policy SS23.
Campus East + ST27: University of York Expansion (21.2ha)*	40,000*	Knowledge based businesses (E)

ST26: Land South of Airfield Business Park, Elvington (7.6ha)	25,080	Research & Development (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8).
Strategic Site Total Floorspace	214,580	

Other Sites

Site	Floorspace (m²)	Suitable Employment Uses
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E11: Annamine Nurseries. Jockey Lane (1ha)	3,300	Office (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8)
E18: Towthorpe Lines, Strensall (4ha) *	13,200	Light Industrial (E), Industrial (B2) and Storage/Distribution (B8).
Other Site Total Floorspace	19,800	
Overall Total Floorspace	234,650	

1.9 Consequently Proposed modification MM4.2 is therefore not supported by the Chamber on the basis that it does not properly meet the test for soundness as set out in Paragraph 182 of the 2012 NPPF, as follows:

- It has not been positively prepared to fully meet the identified need for new employment land as identified in the Local Plan, and does not reflect the current status of the employment allocations or Policy EC1 Note, August 2022 (ref. EX/CYC/107/7)
- It will not be effective in achieving the quantum of employment land and floorspace required to meet York's Sustainable Growth needs and accommodate an annual provision of around 650 new jobs as set out in Policy SS1 of the Plan.
- It is not consistent with national policy in that it will not enable the delivery of sustainable development in accordance with the policies in the NPPF.



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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES

DATA TRENDS

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Started: Monday, March 27, 2023 7:56:06 PM
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Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Alice Ingram

Q3

Contact details: Please provide email and/or address

Organisation (optional) WNY Chamber of Commerce

Address Devere House

Address 2 Vicar Lane, Little Germany

City/town Bradford

Post code BD1 5AH

Email address [REDACTED]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council? If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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459 responses



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Q6

To which section does this response relate?

Section 4: Economy and Retail

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

MM4.3 Policy EC1 explanation

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

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Page 10: Section 7: Education

Q12

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Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

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Respondent skipped this question

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

see attached document

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Modification Ref: MM4.2; MM4.3; MM4.4

Housing Land Provision

Modification Ref: MM3.1; MM3.2; MM3.3; MM3.4

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Modification Ref: MM4.2; MM4.3; MM4.4

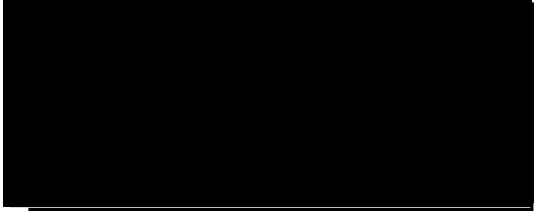
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Mark Casci
Head of Business Representation

City of York Local Plan Modifications Consultation 2023

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- 1.5 Policy EC1 therefore anticipates that the strategic employment allocations will provide a total floorspace of 247,910m², and that the non-strategic allocations will provide a further 29,832m². Overall, the allocations are expected to deliver a total 277,742m² of employment floorspace in context of an identified need of 237,052m² for the period 2017 to 2038 as set out at Table 4.1 of EC1.
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Strategic Sites

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Strategic Site Total Floorspace	214,580	

Other Sites

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E18: Towthorpe Lines, Strensall (4ha) *	13,200	Light Industrial (E), Industrial (B2) and Storage/Distribution (B8).
Other Site Total Floorspace	19,800	
Overall Total Floorspace	234,650	

1.9 Consequently Proposed modification MM4.2 is therefore not supported by the Chamber on the basis that it does not properly meet the test for soundness as set out in Paragraph 182 of the 2012 NPPF, as follows:

- It has not been positively prepared to fully meet the identified need for new employment land as identified in the Local Plan, and does not reflect the current status of the employment allocations or Policy EC1 Note, August 2022 (ref. EX/CYC/107/7)
- It will not be effective in achieving the quantum of employment land and floorspace required to meet York's Sustainable Growth needs and accommodate an annual provision of around 650 new jobs as set out in Policy SS1 of the Plan.
- It is not consistent with national policy in that it will not enable the delivery of sustainable development in accordance with the policies in the NPPF.



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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES

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Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Alice Ingram

Q3

Contact details: Please provide email and/or address

Organisation (optional) WNY Chamber of Commerce

Address Devere House

Address 2 Vicar Lane, Little Germany

City/town Bradford

Post code BD1 5AH

Email address [REDACTED]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council? If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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459 responses



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Q6

To which section does this response relate?

Section 4: Economy and Retail

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

MM4.4 Policy EC1 explanation - table 4.1

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

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Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Q14

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

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Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Respondent skipped this question

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

see attached document

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Modification Ref: MM4.2; MM4.3; MM4.4

Housing Land Provision

Modification Ref: MM3.1; MM3.2; MM3.3; MM3.4

The property forum responding on behalf of the Chamber of Commerce for York and North Yorkshire strongly believes that York urgently needs a local plan. As expressed in our representations going back over many years, we have significant concerns about the current draft local plan. In particular, we believe that the housing requirement is understated and that there is a lack of allocation of employment land which will seriously impede the City of York's economic strategy to promote growth. We are already 7 years into the plan period during most of which time there has been a failure to deliver the required housing supply. This is highlighted by the Council's own housing trajectory in EX_CYC_107_1 which identified an undersupply of housing against requirement for the 5 years 2019/20 to 2023/24. We also note that the housing trajectory identifies completion on some sites in the current year 2023/24. We would ask the Inspector to consider whether those completions are likely to occur. (As a representative organisation the Chamber cannot make comment on specific sites.)

This shortfall in the early years of the Plan not only means that housing needs in general are unmet, but, more significantly, affordable housing needs are also not properly catered for (on the basis that a significant proportion of affordable housing delivery is secured through Section 106 agreements on general market housing).

Employment Land Provision

Modification Ref: MM4.2; MM4.3; MM4.4

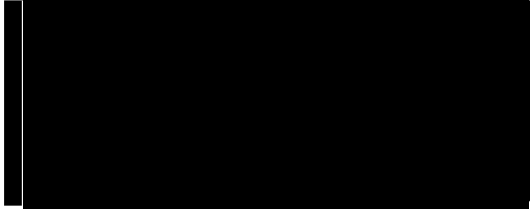
We attach more detailed comments on the Employment Land allocation which highlights our concerns that there is insufficient land allocated. Much of what there is in York Central, which incredibly welcome, is inevitably a long term delivery and likely to be for high quality offices rather than the sort of space for start ups and small businesses to expand or light industrial type uses.

Conclusion

Given the time that has elapsed on the York local plan so far we conclude that the sensible thing is for the plan to be approved so that development can take place in the sound framework. However, we would urge very strongly that the inspectors do whatever they can to require that York's Local Plan is subject to an early, if not immediate review. This is because so much has changed since the evidence base for the current plan was put together. The economic position, impacts of Covid, the impending devolution deal with North Yorkshire. The list could go on. So whilst we want to see a plan in place we need to know that it will be updated in the not too distant future in particular to work with colleagues across the new combined authority to ensure that there is a consistent plan for the York/ North Yorkshire sub-region. The city cannot afford to wait another 60+ years for a properly up to date local plan!

In suggesting this approach, our biggest concern is that this local plan will set the Green Belt boundaries in place. We have significant concerns that insufficient land has been set aside for the city's future growth, and that once the plan is in place, it will be very difficult to amend these boundaries. If there is any opportunity to insist on safeguarded land before the plan is approved, we would urge that the inspectors do this.

Yours sincerely



Mark Casci
Head of Business Representation

City of York Local Plan Modifications Consultation 2023

Consolidated Main Modifications (January 2023) - Modification Ref. MM4.2 on Policy EC1: Provision of Employment Land

- 1.1 Policy EC1 relates to provision of employment land required to meet York's Sustainable Growth needs and accommodate an annual provision of around 650 new jobs as set out in Policy SS1 of the Plan.
- 1.2 The Policy sets out the Plan's approach to in relation to its overall forecast for jobs and how this has been
"disaggregated into the different economic sectors and converted into floorspace requirements using widely recognised job density and plot ratio assumptions"(para 4.6).
- 1.3 Overall, the Plan identifies a total requirement for around 38ha of new employment land to be provided across the plan period 2017-2032/33 with an additional five years to 2038 to ensure Green Belt permanence. The Employment Land Requirements are set out at Table 4.1 of Policy EC1, as below:

Table 4.1: Employment Land Requirements 2017-2038 (including 5% vacancy), Factoring in Change of Supply 2012-2017 and Including 2 Years Extra Supply, updated March 2022

Use Class	2021-33		2033-38		Total 2021-2038	
	Floorspace (m ²)	Land (Ha)	Floorspace (m ²)	Land (Ha)	Floorspace (m ²)	Land (Ha)
Office (formerly B1a)	137,588	15.5	12,310	2.1	149,898	17.6
Research & Development (B1b)	15,655	3.7	1,644	0.4	17,299	4.1
Light Industrial (formerly B1c)	11,218	1.9	1,435	0.4	12,653	2.3
General Industrial (B2)	0	0	0	0	0	0
Storage & Distribution B8	54,986	10.5	15,705	3.2	70,691	13.7
B Uses Sub Total	219,447	31.6	31,094	6.2*	250,541	37.7
D2	-17,887	-1.1	4,398	1.1	-13,489	0
Totals	201,560	30.5	35,492	7.2	237,052	37.7

1.4 To meet the identified need for new employment land, Policy EC1 lists five strategic and five non-strategic allocated sites at which provision is to be made for a range of employment uses. These are detailed in EC1 as follows:

Strategic Sites

Site	Floorspace (m ²)	Suitable Employment Uses
ST5: York Central	100,000	Office (E)
ST19: Land at Northminster Business Park (15ha)	49,500	Light Industrial (E), Industrial (B2) + Storage/Distribution (B8), + element of Office (E) in line with Policy SS23.
Campus East + ST27: University of York Expansion (21.2ha)*	40,000*	Knowledge based businesses (E)
ST26: Land South of Airfield Business Park, Elvington (7.6ha)	25,080	Research & Development (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8).
ST37: Whitehall Grange, Wigginton Road (10.1ha)	33,330	Storage/Distribution (B8).

*This is an approximate and indicative figure based on the University of York's predicted growth and may be reduced to accommodate other employment generating University uses identified in Policy ED1

Other Sites

Site	Floorspace (m ²)	Suitable Employment Uses
E9: Elvington Industrial Estate (1ha)	3,300	Research & Development (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8).
E10: Chessingham Park, Dunnington (0.24ha)	792	Light Industrial (E), Industrial (B2) + Storage/Distribution (B8).
E11: Annamine Nurseries. Jockey Lane (1ha)	3,300	Office (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8)
E16: Poppleton Garden Centre (2.8ha)	9,240	Light Industrial (E), Industrial (B2) + Storage/Distribution (B8). May also be suitable for element of Office (E)
E18: Towthorpe Lines, Strensall (4ha) *	13,200	Light Industrial (E), Industrial (B2) and Storage/Distribution (B8).

* Given the site's proximity to Strensall Common SAC (see explanatory text), this site must take account of Policy GI2a.

- 1.5 Policy EC1 therefore anticipates that the strategic employment allocations will provide a total floorspace of 247,910m², and that the non-strategic allocations will provide a further 29,832m². Overall, the allocations are expected to deliver a total 277,742m² of employment floorspace in context of an identified need of 237,052m² for the period 2017 to 2038 as set out at Table 4.1 of EC1.
- 1.6 Proposed Modification ref. MM4.2 states that the Council's amendments to Policy EC1 *"reflect the Status of Employment Allocations identified in Policy EC1 Note August 2022 (EX/CYC/107/7)"*.
- 1.7 However, there appears to be some key inconsistencies between Policy EC1 and Policy EX/CYC/107/7, which states that:
- **Strategic Site ST37 (Whitehall Grange) is not available for development** being subject of approvals and development for a car storage facility, with no capacity remaining for further development
 - **Non-Strategic Site E16 (Poppleton Garden Centre) is not available for development** being in use as a Garden Centre, on which basis *"the Council consider the land is no longer available for employment use"*(p. 17).
 - **Non-Strategic Site E10 (Chessingham Park) is fully developed**, having delivered 372m² of Class B2 floor space (as opposed to the 792m² identified in EC1) with no capacity remaining for future development.
- 1.8 In light of the above, and in order to fully *"reflect the Status of Employment Allocations identified in Policy EC1 Note August 2022 (EX/CYC/107/7)"*, its is questionable whether Sites ST37, E16 and E10 are genuinely available as part of the employment land supply. If they are not counted in the land supply the allocated sites will not meet the employment floorspace requirement of 237,052m² as identified in Table 4.1 of Policy EC1 as demonstrated the tables below.

Strategic Sites

Site	Floorspace (m ²)	Suitable Employment Uses
ST5: York Central	100,000	Office (E)
ST19: Land at Northminster Business Park (15ha)	49,500	Light Industrial (E), Industrial (B2) + Storage/Distribution (B8), + element of Office (E) in line with Policy SS23.
Campus East + ST27: University of York Expansion (21.2ha)*	40,000*	Knowledge based businesses (E)

ST26: Land South of Airfield Business Park, Elvington (7.6ha)	25,080	Research & Development (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8).
Strategic Site Total Floorspace	214,580	

Other Sites

Site	Floorspace (m²)	Suitable Employment Uses
E9: Elvington Industrial Estate (1ha)	3,300	Research & Development (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8).
E11: Annamine Nurseries. Jockey Lane (1ha)	3,300	Office (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8)
E18: Towthorpe Lines, Strensall (4ha) *	13,200	Light Industrial (E), Industrial (B2) and Storage/Distribution (B8).
Other Site Total Floorspace	19,800	
Overall Total Floorspace	234,650	

1.9 Consequently Proposed modification MM4.2 is therefore not supported by the Chamber on the basis that it does not properly meet the test for soundness as set out in Paragraph 182 of the 2012 NPPF, as follows:

- It has not been positively prepared to fully meet the identified need for new employment land as identified in the Local Plan, and does not reflect the current status of the employment allocations or Policy EC1 Note, August 2022 (ref. EX/CYC/107/7)
- It will not be effective in achieving the quantum of employment land and floorspace required to meet York's Sustainable Growth needs and accommodate an annual provision of around 650 new jobs as set out in Policy SS1 of the Plan.
- It is not consistent with national policy in that it will not enable the delivery of sustainable development in accordance with the policies in the NPPF.