



City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES

DATA TRENDS

INDIVIDUAL RESPONSES

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Respondent #58 ▼



INCOMPLETE

Started: Wednesday, February 22, 2023 10:56:59 AM
Last Modified: Wednesday, February 22, 2023 11:20:58 AM
Time Spent: 00:23:58
IP Address: 88.104.11.120

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:

Victor Keith Stannard

Q3

Contact details: Please provide email and/or address

Address

Address 2

City/town

Post code

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.

Proposed Policy Map Modifications - link

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459 responses



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To which section does this response relate?

Respondent skipped this question

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?

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

Page 12: Section 9: Green Infrastructure

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459 responses

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?

PMM18 - St. Peter's School (Policies Map North) link

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 justified - i.e. there is no evidence to justify the modification

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.

This is not justified because it removes a vital protection that St Peter's school has long been hoping to develop for commercial gain. That is why they lobbied long and hard for this amendment with CYC AND the Inspectorate

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City of York Local Plan Modifications Consultation 2023

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INDIVIDUAL RESPONSES

All Pages ▼

Respondent #86 ▼



COMPLETE

Started: Tuesday, February 28, 2023 3:15:39 PM
Last Modified: Tuesday, February 28, 2023 4:14:56 PM
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IP Address: 88.104.11.120

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:

Victor Keith Stannard

Q3

Contact details: Please provide email and/or address

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Address 2

City/town

Post code

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.

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459 responses



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To which section does this response relate?

Respondent skipped this question

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

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Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

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Page 7: Section 4: Economy and Retail

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Q12

To which modification does this response relate?

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

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To which modification does this response relate?

Respondent skipped this question

Page 12: Section 9: Green Infrastructure

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459 responses

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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

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To which modification does this response relate?

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Page 15: Section 12: Environmental Quality and Flood Risk

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Page 16: Section 14: Transport and Communications

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To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

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Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20
To which modification does this response relate?

PMM18 - St. Peter's School (Policies Map North) link

Page 19: New evidence documents

Q21
To which evidence document does this response relate?

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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 justified - i.e. there is no evidence to justify the modification

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.

This is not justified because it removes a vital protection that St Peter's school has long been hoping to develop for commercial gain. That is why they lobbied long and hard for this amendment with CYC AND the Inspectorate. I also believe that the Inspectors' reasoning is defective in that they assert that this is NOT an open section of land anymore, is covered in fenced enclosures and floodlights; it is NOT. They seem to be discussing it as though St Peter's proposals for this land have already been granted and carried out! To allow, via a change in Green Belt status, for 8 acres of former water meadow on a Zone 3 flood plain, to be covered in car parking, floodlights and artificial pitches would be an abomination flying in the face of all current local and national guidance re: preservation of green space in sensitive urban/ecological areas. Changing this land to Educational use from Green Belt would make this disaster much more likely. I attach some pics for your elucidation.

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1. **Pmm18:** Open Vista from the Flood Bund



3. From Westminster Road End



2. Current GB looking west over school grounds; bottom left to middle right
Note tennis courts and artificial pitches to left. School plans to cover the remaining 8 acres with much more and a car park

4. The School's proposals for this area, with 15 metre Floodlighting poles



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City of York Local Plan Modifications Consultation 2023

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All Pages ▼

Respondent #87 ▼



COMPLETE

Started: Tuesday, February 28, 2023 4:14:57 PM

Last Modified: Tuesday, February 28, 2023 4:32:04 PM

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IP Address: 88.104.11.120

Page 1: Survey Information

Q1

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Yes

Page 2: Register for consultation

Q2

Your name:

Victor Keith Stannard

Q3

Contact details: Please provide email and/or address

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Page 18: Proposed Policy Map Modifications

Q20
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PMM50 - St Peters School (Policies Map North) link

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 justified - i.e. there is no evidence to justify the modification

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

Not consistent with national policy - i.e. doesn't comply with the law

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.

No need to change use as national rules for GB allow replacement buildings (as school argue), and Sport England say replacing grass pitches with artificial ones (as school wishes to do) is against current guidelines and actually reduces educational sporting flexibility. Will upload SE report for reference

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[REDACTED]

From: Richard Fordham [REDACTED]
Sent: 14 December 2022 13:57
To: [REDACTED] planning.comments@york.gov.uk
Cc: [REDACTED]
Subject: App Ref: 22/02288/FUL - ST PETERS SCHOOL, Clifton, YO30 6AB - Sport England
Ref: PA/22/Y/YC/63239

Categories: Debs - 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.

Dear [REDACTED]

Thank you for consulting Sport England on the above planning application.

Sport England – Statutory Role and Policy

It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework (particularly Paragraph 99) and Sport England’s Playing Fields Policy, which is presented within its ‘Playing Fields Policy and Guidance Document’ that can be viewed on this [link](#).

Sport England’s policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all/part of a playing field, unless one or more of the five exceptions stated in its policy apply.

The Proposal and Impact on Playing Field

The proposal is for the erection of floodlit hockey pitch and tennis/netball courts, cricket nets, resurfacing and floodlighting to existing hockey pitch and associated access, car parking, coach drop-off, storage and landscaping. The proposal also includes alterations to the pitch layouts and configurations, relocation of the athletics track and alterations to the cricket wickets. The full detail of the proposed new and relocated sport facilities and alterations to the playing field are set out on the plan titled “Proposed Playing Field Layout”.

As part of the assessment of this consultation, Sport England has sought the views of a number of National Governing Bodies for Sport (NGBs). These NGBs act as Sport England's technical advisors in respect of their sport and their sport facilities.

The comments of England Hockey (EH) have been summarised as:

- *There is a need to provide a more permanent home at one site for City of York Hockey Club to establish a true club site and retain members. Currently there is a significant demand for floodlit training and playing facilities for all sports but this is concentrated on very few pitches in the City meaning clubs are struggling to grow, Hockey is no stranger to having to share facilities with sports such as football.*
- *EH recognises that St Peters School have a significant Hockey programme for both curriculum and extra curriculum.*
- *The proposed facility meets the requirements for Hockey. Although the detail of long term community use in perpetuity for the life of the facility is significantly lacking to ensure that strategic support for City of York Hockey Club is met, as referenced above, more detail and discussions would be welcomed.*
- *From early conversations with the applicants consultant the school having a requirement for significant evening and weekend use means the true strategic value for community Hockey is minimal. EHs view would be that the pitches would be available for 1-2 hours for weekday evenings and afternoons only on weekends. This would severely limit the amount of Community Hockey time compared to a usual site that would have 3-4 hours evening use and full day weekend availability.*
- *EH would welcome the ability to scenario test this application as part of the York Playing Pitch Strategy Stage D.*

The comments of Rugby Football Union (RFU) have been summarised as:

- *The loss of the three rugby union pitches on the portion of land for the proposed hockey suitable artificial grass pitch are to be mitigated by the creation of four rugby union pitches on two separate cricket outfields. This is an acceptable adjustment in principle, however, increased maintenance works and potentially some improvements to drainage will be required to ensure that these existing areas of playing field are capable of accommodating year-round curricular & extra-curricular activity. Based on this, the RFU would seek for an independent agronomy report on the proposed locations for the rugby union pitches both pre and post construction to ensure that the playing areas can be used for both rugby union and cricket seasons.*

- *There are some concerns regarding the proposed placement of the long jump area; as it appears to partially sit within the safe run-off area of an existing rugby union pitch. Given that the long jump area will be a permanent fixture, with differing surface types to the in-situ grass playing field it poses a potential risk to users of the rugby union pitch. Reducing the length of the rugby union pitch to accommodate the long jump area would not be suitable given that it is currently of minimum dimensions.*
- *There are also concerns with the proposed location of one pitch on the eastern playing fields, on the outfield of an existing cricket square. The proposed submission would suggest that one pitch on this land will sit very close to the site boundary, with the safe run off areas on the opposite side of existing fencing/hedgerow. There does not appear to be sufficient space on the site to relocate the pitch further east due to the presence of existing cricket wickets nor for the pitch width to be reduced further.*
- *The applicant should seek to address these concerns to ensure that rugby union is appropriately mitigated on the site and that the School's rugby union provision continues to appropriately accommodate one of the club's primary sporting offers.*

The comments of the England Cricket Board (ECB) have been summarised as:

- *Disappointing to see the loss of a cricket pitch and downgrading of other facilities as part of this project.*
- *A Non Turf pitch would have to be an approved system installed by an approved supplier. We don't understand the comment about a new wicket in the middle of a rugby pitch? The commentary states that this would be an approved system, but we wouldn't approve a new pitch in the middle of a rugby pitch.*
- *The school strategy appears to be to install a new hockey pitch as it is the most popular sport and currently matches have to be played off site, however the mitigation for other sports appears to be that we have relationships with other sports clubs and we will move cricket/rugby off site where demand exceeds supply – so something has to be played off site?*
- *Undoubtedly playing rugby on a cricket outfield will mean it will deteriorate in quality and therefore care would need to be taken in the planning to ensure this would be kept to a minimum.*
- *Athletics and cricket occur at the same time of year and therefore this could limit the number of cricket games played on site.*
- *No detail provided as to whether the proposals meet our technical requirements.*

- *Girls cricket is a growing element of our sport and a reduction of playing facilities could limit opportunities for girls to play formal matches. Installation of hybrid pitches do not reduce preparation time as they are still fine turf wickets.*

The comments of the Lawn Tennis Association (LTA) have been summarised as:

- *The loss of the existing tennis courts is mitigated by the construction of 2 new blocks with 3 tennis courts per block and a new synthetic pitch that will include multiple tennis court markings.*
- *The LTA is satisfied that the proposed new tennis courts will comply with LTA recommended standards and will be built in accordance with the SAPCA Code of Practice for Construction of and Maintenance of Outdoor Tennis Courts.*
- *There is a high level of participation and latent demand for tennis in York, and the development of the new tennis courts in this location will help meet the strategic need for tennis locally.*
- *The design of the new courts does meet LTA design guidance.*

England Athletics (EA) were also consulted for their views. However at the time of writing non were received. However England Athletics did provide comments on the pre application enquiry (see Sport England's later comments on the pre application enquiry) and EA commented that:

- *EA are supportive of the proposed 300m synthetic track with ancillary jumps/throws provision. Note: Next phase plans/technical layouts should be developed in consultation with England Athletics and a UKA/SAPCA approved Track & Field consultant)*
- *The 300m non-standard oval is a good solution for the site and fits EAs MiniTrack model.*
- *Further engagement needed with EA to develop the technical layouts as (ideally) all ancillary jumps and throws provision should be located within/adjacent to the main track (the current plans show provision that is spread across the entirety of the site)*
- *EA would also want to see basic floodlighting of the track and field events (100lux minimum) so that the facility can be used by both school and community all year round.*
- *Engagement with local athletics club(s) and the development of a CUA as the scheme progresses*

Assessment against Sport England Policy/NPPF

Paragraph 99 of National Planning Policy Framework states that existing open space, sports and recreational buildings and land, including playing fields, should not be built

on unless c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. Paragraph 99C of the NPPF reflects exception E5 of Sport England's Playing Fields Policy.

In considering proposals for other indoor or outdoor sport facilities on playing field, Sport England will not object to such proposals if they are considered to meet our exception E5 of the Playing Fields Policy which states:

'E5 The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.'

Whilst Sport England does not wish to discourage new sport facilities, where they result in the loss of grass playing field, it is essential that there are sufficient benefits to the development of sport as to outweigh the detriment caused by the loss of the playing field. This is because any area of a grass playing field can be used for sporting purposes covering over 15 different sports whether competitively or for general training/skills sessions.

A hockey pitch, tennis/netball courts and cricket nets are fixed structures with fixed dimensions, only suitable for a limited number of sports. They can't be moved around and resized to cater for changes in sport over the years.

In seeking to balance the potential loss of playing field against the provision of a new indoor or outdoor sports facility, Sport England will consider the following factors set out in the bulleted points:

- The need for the facility – has this been identified in a local sport and recreation strategy, a governing body facility strategy or similar document?
- Technical suitability – does the proposed facility meet the specifications set out in Sport England's Guidance Notes or a relevant National Governing Body of Sport's Guidance Notes?
- Community availability – will the facility be available to the community and if so, will the terms of availability be clearly set out in a community use agreement?
- Sports development – will the facility be linked into the local sports development network?
- Local level of pitch provision – does the local area have a shortfall of playing pitches that would be exacerbated by the current proposal?
- The physical location of the new facility – is it easily accessible by the community and schools?
- Improves the delivery of sport and physical education on school sites.

Sport England has assessed the proposal against exception E5 and the bulleted points above and the various elements of the proposal.

The proposed hockey pitch

Reference is made in the Planning Statement to York's Playing Pitch Strategy (PPS) of 2014 and also York's Built Sports Facilities Strategy 2014. Sport teams fold and start up season to season and sometimes within a season so it's paramount the data is revisited frequently. Sport England recommends in respect of our guidance for PPS that if no review and subsequent update has been carried out within three years of the PPS being signed off by the steering group, then Sport England and the National Governing Bodies would consider the PPS and the information on which it is based to be out of date.

In respect of Built Sport Facility Strategies, Sport England's guidance advises that Local Authorities should not need to undertake a comprehensive assessment more frequently than every five years for the majority of facility types. However, any assessment should be regularly updated looking at short term changes in the supply and demand information and issues. If there is no evidence of any appropriate review and subsequent update being undertaken within five years of an assessment being completed Sport England would not consider the assessment to be up-to-date. After this time it would be difficult to justify that the assessment and information on which it is based is sufficiently robust.

These documents are now eight, coming up to nine years old, and as an evidence base they are now out of date. In respect of a PPS, the Council agree that it is out of date as they have commissioned the production of a new PPS. This PPS is currently being produced and when completed, will provide an up to date evidence base in respect of the demand and supply of pitch sports across York including details of any strategic need for new facilities.

In the absence of an up to date evidence base, Sport England will seek and consider the views of the relevant National Governing Bodies for Sport. These NGBs have local intelligence in respect of their sport and can also seek the views of local sports clubs. The NGBs are also involved in the current production of the Council's PPS and provide the demand and supply data to inform the PPS. As such, Sport England can give the views of the NGBs some weight in the determination of this consultation.

As can be seen from the comments of EH above, there is a significant demand for floodlit training and playing facilities for all sports but this is concentrated on very few pitches in the City meaning clubs are struggling to grow. Therefore, this suggests that

there is demand for hockey pitches in York and the proposed would meet the bullet point of strategic need above.

However, EH comment that from early conversations with the applicant's consultant, the school having a requirement for significant evening and weekend use means the true strategic value for community Hockey is minimal. EHs view would be that the pitches would be available for 1-2 hours for weekday evenings and afternoons only on weekends. This would severely limit the amount of Community Hockey time compared to a usual site that would have 3-4 hours evening use and full day weekend availability.

Sport England does consider whether a facility proposed on playing field will be available for community use and this is one of the bulleted points above. The Planning Statement makes reference to the facility being available for community use, however the comments of EH in respect of the school having a requirement for significant evening and weekend use means the true strategic value for community Hockey is minimal.

As such, Sport England would require more information on the strategic need and community use to fully assess if the proposed Hockey pitch meets E5.

Impact on cricket

The plans of the existing playing field layout shows that the site of the proposed hockey pitch is used for cricket. A cricket wicket Astro is proposed on the existing cricket pitch to the west of the proposed hockey pitch along with two hybrid wickets added to the cricket pitch to the east of the proposed hockey pitch. Rugby pitches, that will be displaced by the proposed hockey pitch, will also be overlaid on the cricket pitch to the east of the proposed Hockey Pitch. This is all detailed on the plan titled "*Proposed Playing Field Layout*".

As set out above, Sport England will consider the bullet point in relation to the local level of pitch provision – does the local area have a shortfall of playing pitches that would be exacerbated by the current proposal.

As can be seen from the comments of the ECB above, they state that they don't understand the comment about a new wicket in the middle of a rugby pitch. The commentary states that this would be an approved system, but ECB wouldn't approve a new pitch in the middle of a rugby pitch. The ECB also comment that the school strategy appears to be to install a new hockey pitch as it is the most popular sport and currently matches have to be played off site, however the mitigation for other sports appears to be that we have relationships with other sports clubs and we will move

cricket/rugby off site where demand exceeds supply – so something has to be played off site?

ECB further comment that undoubtedly playing rugby on a cricket outfield will mean it will deteriorate in quality and therefore care would need to be taken in the planning to ensure this would be kept to a minimum. Athletics and cricket occur at the same time of year and therefore this could limit the number of cricket games played on site.

Given the comments raised by ECB, there is currently insufficient information for Sport England to consider the impact that the proposal will have on the displaced cricket and the bullet point in respect of impact on local level of pitch provision.

ECB have also commented that no detail is provided as to whether the proposals meet their technical requirements. As previously stated, the NGBs are Sport England's technical advisors in respect of their sport and therefore without sufficient detail of the technical impact, it is not possible to consider the technical suitability bullet point above.

Impact on rugby

The plans of the existing playing field layout show that the site of the proposed hockey pitch is on playing field that is used for rugby. Rugby will be relocated to the cricket pitch to the east of the proposed hockey pitch and athletics facilities will overlaid on the rugby pitches to the north west of the proposed hockey pitch.

As is the case for cricket above, Sport England will consider the local level of pitch provision – does the local area have a shortfall of playing pitches that would be exacerbated by the current proposal in relation to rugby.

The RFU have commented that the loss of the three rugby union pitches on the portion of land for the proposed hockey suitable artificial grass pitch are to be mitigated by the creation of four rugby union pitches on two separate cricket outfields. This is an acceptable adjustment in principle, however, increased maintenance works and potentially some improvements to drainage will be required to ensure that these existing areas of playing field are capable of accommodating year-round curricular and extra-curricular activity. Based on this, the RFU would seek for an independent agronomy report on the proposed locations for the rugby union pitches both pre and post construction to ensure that the playing areas can be used for both rugby union and cricket seasons.

The RFU also comment that there are some concerns regarding the proposed placement of the long jump area as it appears to partially sit within the safe run-off

area of an existing rugby union pitch. Given that the long jump area will be a permanent fixture, with differing surface types to the in-situ grass playing field it poses a potential risk to users of the rugby union pitch. Reducing the length of the rugby union pitch to accommodate the long jump area would not be suitable given that it is currently of minimum dimensions.

Finally, the RFU comment that there are also concerns with the proposed location of one pitch on the eastern playing fields, on the outfield of an existing cricket square. The proposed submission would suggest that one pitch on this land will sit very close to the site boundary, with the safe run off areas on the opposite side of existing fencing/hedgerow. There does not appear to be sufficient space on the site to relocate the pitch further east due to the presence of existing cricket wickets nor for the pitch width to be reduced further.

Given the comments of the RFU above, the proposal will have an impact on rugby provision and as such it has not been demonstrated that the bullet point in relation to local level of pitch provision has been met.

The relocated and new tennis courts.

The proposed hockey pitch will be on the site of existing tennis and netball courts. These will be relocated to the north west of the proposed hockey pitch. The LTA, as Sport England's technical advisors in respect of tennis, have commented that loss of the existing tennis courts is mitigated by the construction of 2 new blocks with 3 tennis courts per block and a new synthetic pitch that will include multiple tennis court markings and the LTA is satisfied that the proposed new tennis courts will comply with LTA recommended standards and will be built in accordance with the SAPCA Code of Practice for Construction of and Maintenance of Outdoor Tennis Courts.

As such, Sport England is satisfied that there will be no impact on tennis provision.

Relocated athletics facilities

The athletics facilities will be relocated to accommodate the proposed hockey pitch. EA comment that they are supportive of the proposed 300m synthetic track with ancillary jumps/throws provision. As such, Sport England is satisfied that there will be no impact on athletics provision.

Does the proposal meet E5?

As can be seen above, a number of the bulleted points in relation to assessing the proposal against policy exception E5 have not been met. The salient element of

exception E5 is sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields. A key indicator of sufficient benefits to the development of sport is the views of the NGBs, several who have raised concerns as set out above.

Currently, there is insufficient information for Sport England to fully assess whether the proposal meets Exception E5 of Sport England's Playing Fields Policy.

Pre application enquiry

The Planning Statement makes reference to pre application engagement with Sport England. Whilst the applicant did approach Sport England at the pre application stage, we advised the applicant that there was currently insufficient information to assess the proposal in order for Sport England to offer an opinion on whether the proposal meets exception E5. As the proposal currently stands, Sport England would be minded to object to the proposal if we were formally consulted by the Local Planning Authority on a planning application.

The applicant then provided Sport England with further information at the pre application stage at the same time as advising Sport England that the planning application had been submitted.

In cases where Sport England has a current pre application enquiry and we are notified that the formal planning application has been submitted before the pre application enquiry is concluded, Sport England will no longer provide any pre application comments nor engage any further in the pre application process. This is because it is no longer pre application. To do so would represent a duplication of our resources.

Sport England offers pre application advice, and unlike many other organisations, we do not charge for this. However, we would expect anyone using our service to allow sufficient time for the pre application process to conclude before submitting the formal planning application. This allows for any issues that may be raised by Sport England to be fully addressed as part of the formal planning submission.

It is unfortunate that the applicant did not fully resolve these issues with Sport England at the pre application stage before submitting the planning application. If they had done so, Sport England may have been in a position to provide a difference response to this current planning application.

Conclusion

In light of the above, Sport England **objects** to the application because it is not considered to accord with any of the exceptions to Sport England's Playing Fields Policy or with Paragraph 99 of the NPPF.

Should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's objection then in accordance with The Town and Country Planning (Consultation) (England) Direction 2021, the application should be referred to the Secretary of State, via the Planning Casework Unit.

Possible resolution

Sport England would suggest that the applicant addresses the issues raised by EH, ECB and the RFU above and also the bulleted points in relation to E5.

As a way forward, Sport England would suggest that the applicant approaches the individual NGB for more information and clarification in respect of the comments raised the contacts are copied into this email. The applicant should however be advised that the NGBs can only provide technical advice in respect of their sport. They cannot offer a planning judgement. This is a matter that Sport England provides as a statutory consultee.

Alternatively, England Hockey have suggested that this proposal could offer an opportunity to be scenario tested in the York Playing Pitch Strategy (PPS). The PPS is currently being produced, and there is an opportunity for Sport England to request to the Council that this proposal is considered as part of the PPS.

Sport England would advise that rather than sending further information piecemeal, that the applicant provides a comprehensive package of information that addresses all of the above issues when the information is available. Sport England can then provide the Local Planning Authority with a substantive response and review the additional information in relation to policy exception E5.

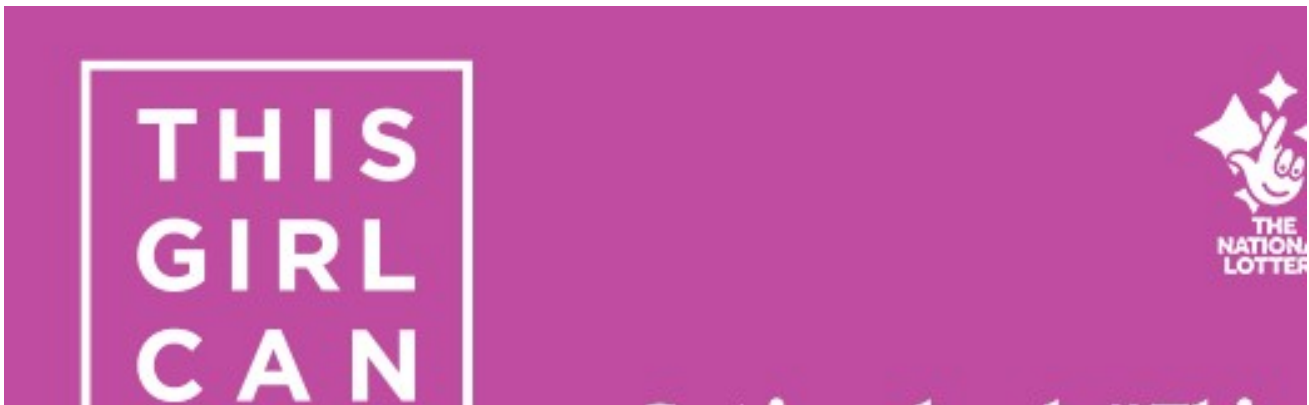
If the applicant does not wish to address the above, or provide any further information to address Sport England's objection, then they should state this to the Local Planning Authority with the reasons why they are not doing so.

In providing any further information, Sport England would ask that the applicant submits this to the Local Planning Authority and not to Sport England directly. That way it forms part of the planning application submission and its associated audit trail. The Local Planning Authority can then consult Sport England on receipt of this information.

Yours sincerely,

Richard Fordham BA(Hons), DipTP, MTP, MRTPI, AIPROW
Planning Manager

T: [REDACTED]
M: [REDACTED]
F: [REDACTED]
E: [REDACTED]



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES

DATA TRENDS

INDIVIDUAL RESPONSES

All Pages ▼

Respondent #272 ▼



COMPLETE

Started: Friday, March 24, 2023 5:37:29 PM
Last Modified: Friday, March 24, 2023 5:44:52 PM
Time Spent: 00:07:22
IP Address: 79.69.140.15

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:

Victor Keith Stannard

Q3

Contact details: Please provide email and/or address

Address

Address 2

City/town

Post code

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.

Proposed Policy Map Modifications - link

Share Link



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459 responses



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To which section does this response relate?

Respondent skipped this question

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?

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

Page 12: Section 9: Green Infrastructure

Share Link

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459 responses

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?

PMM18 - St. Peter's School (Policies Map North) link

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 justified - i.e. there is no evidence to justify the modification

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.

Changing the designation of the area around St Peter's from GB to Educational will increase the likelihood of this open space being developed. The Local Plan Inspectors claim this change will make no difference, but a review by CYC Landscape Architect refutes this comprehensively, which we are all in agreement locally. If the school is able to use this alteration to advance their plans, the results will be dreadfully detrimental and GB status therefore needs to be maintained. I attach LA report.

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Design, Conservation & Sustainable Development

Re: St. Peter's School, Clifton

Ref: 22/02288/FULM

Date: 17.03.2023

File: L:\GROUP\DCSD\DM Consultations\DM
Consultations 2022\Clifton

To: [REDACTED] Development Management

From: [REDACTED] Landscape architect

Ext: 1341

Main reference documents:

Ryland Consultant Arborist	Arboricultural Report	QO/10228.Rpt.
Barton Howe Associates	Planting Plan	BHA_22_1011_JoN_L_002.
LHL Group (27.10.22)	Existing Site Plan	09950-QSS-22-202.
LHL Group (27.10.22)	Proposed Site Layout	09950-QSS-22-203.

Proposed development:

Erection of floodlit hockey pitch and tennis/netball courts, cricket nets, resurfacing and floodlighting to existing hockey pitch and associated access, car parking, coach drop-off, storage and landscaping

The areas of consideration relating to landscape matters are:

- Impact on the landscape resource and amenity – namely existing trees.
- Impact on the natural open landscape character of the site and potential influence on the adjacent landscape character.
- Impact on views of the landscape (including listed buildings – St. Peter's school and York Minster).

Landscape resource - Existing trees

The applicant has submitted a detailed tree survey of the Horse chestnut located at the end of Westminster Road. There are a number of other trees that could be affected by the proposed development. These should have been picked up in a tree survey to BS 5837 and an arboricultural impact assessment. I address these below but I do not have dimensions of the trees, or their recommended root protection areas (RPA), nor notes on their condition. The proposed site plans show the location of the retained trees and their canopy spreads. The plans should also include the recommended root protection areas

Horse chestnut – end of Westminster Road

The Horse chestnut located at the southern end of Westminster Road is subject to a tree preservation order (TPO) reference CYC 204-T1. It is a large, prominent, and familiar tree, with high public amenity value, and also community value.

There is existing hardstanding over approximately 50% of the rooting zone of the tree - made up of a concrete highway, two tarmacadam footpaths, and a compacted stone access road.

Despite the tree's vulnerable position, it is in good overall health and condition. No evidence of structural weakness was identified when the tree report was carried out in April 2022; and there are no arboricultural requirements to carry out works to the tree. The exposed surface buttress roots show historical damage but no visible signs of decay.

There is some historical wounding to one of the main limbs overhanging the current access road. My own records suggest this damage was caused in about 2004/2005 by a high-sided vehicle. This illustrates vulnerability of the low limbs to impact damage.

Due to the position of footpath, road, and field access beneath the crown of this species, the risk to the public may be classed as slightly above normal risk. The proposed increase in traffic underneath its crown would increase the target risk. This could be exacerbated by a reduction in the quality of the rooting zone of the tree if its welfare is affected.

The proposed development involves a lot of revisions to the existing surface treatments. These would be necessary to enable regular vehicle access into the site from the end of Westminster Road. Despite the proposed no-dig constructions, the proposed development poses a significant residual risk of harm to the wellbeing of the tree for the reasons I explain below.

The proposed road is incredibly close to the tree trunk; therefore there is still concern over direct impact damage both during the construction phase and the operational phase. This could be to the exposed buttress roots, trunk, and/or low limbs.

There is also a risk of damage to roots due to additional excavations; a degradation of the rooting zone due to additional compaction; and potential contamination from e.g. de-icing salt, oil, cement. There may also be drainage requirements, lighting and signage associated with the construction of the proposed road that may impact on the tree/s.

Given the extent of hard surfacing within the theoretical recommended root protection area, the roots are likely to favour the areas of greatest porosity.

The area immediately around the east and south side of the trunk is compacted stone. This will still have a degree of porosity, unlike the concrete surfacing of Westminster roadway which will be impervious. The amount of tarmac along the alignment of the two footpaths is relatively limited in quantity.

The remainder of the RPA consists of grass. The access track into the field and the Yorkshire Water access track are compacted but essentially porous tracks within grass.

The proposed single track, give-way system, past the Horse chestnut, places a significant additional area of impervious hard construction within the RPA of the tree, and places the edge of the roadway in very close proximity to the base of the trunk. The trunk has a significant flare at its base and some of the structural surface roots are visible some distance beyond the ground level circumference of the tree. Given the quantity, size and volume of traffic proposed for this route, I am assuming that some sort of edge restraint would also be required.

Due to the structure of the tree, there is little scope to raise the crown of the tree without resulting in large wounds which would increase the risk of the ingress of infection. Therefore, there would have to be a height limit on vehicles entering and leaving the site. It would not be enough to install a height restriction sign. There would have to be height restriction barriers in place.

Therefore, I recommend that no additional hard standing is introduced into the recommended root protection area of the Horse chestnut; and existing areas of pervious hardstanding should remain so.

A site meeting would be helpful with the highway proposals marked out for discussion.

Willow

The proposed access road and pavement is placed tight against the east (northeast) hedge that separates the sports fields from the public footpath that runs along the east (northeast) boundary.

The impressively large veteran willow outside of the site is subject to TPO CYC 204-T2. The crown of the tree overhangs the site. Given the large diameter of the trunk and the age of the tree, the recommended root protection area is very likely to extend for several metres into the site. Therefore, the proposed road and pavement poses a risk of harm to the health of the Willow.

Other existing trees

There are a number of mature, trees within the northwest boundary of the site. These have high public amenity value due to their size and location. They also provide some screening of the site in the summer months in views from the west. The proposed all weather tennis and netball courts and fencing would encroach into the likely RPAs of these adjacent trees. This needs to be addressed.

Some young trees outside the northwest corner of the tennis courts have become well established. The group of trees was planted to soften the boundary between the new courts and the remaining grassed open space in views from the outside of the site (which include views of York Minster) as part of the planning approval for the existing all-weather tennis courts. The removal of these trees would be necessitated by the proposed development, which would result in a reduction to the amenity and resource of the existing landscape.

New tree planting is proposed within the car park and around the cricket/hockey practice. These will provide some mitigation by way of quantity but would not provide visual mitigation within the views that the existing planting was intended to improve.

I note the Zelkova at the site entrance has already been felled. This was not a protected tree and was outside of the conservation area.

Landscape character

Westminster Road

The wide grass verges and street trees are an attractive characteristic of

Westminster Road. The proposed development would result in the loss of the grass verge and one young tree in front of house nos 49-55, to create four pull-in bays. The extent of new hard-standing would prevent the planting of replacement trees elsewhere within the same stretch of road. Consequently, this element of the proposed development would reduce the public amenity of this end of the street. Given the limited extent of the proposed works, this would not cause significant harm to the appearance and character of the street as a whole.

Sport fields

Due to the openness of the site and the remaining expanse of existing grass, it reads as part of the wider open space between the urban edge and the river Ouse, which also includes open space on the opposite bank. The conglomeration of open spaces add up to a valuable sense of open landscape in very close proximity to the city centre and residential areas.

The main body of the site consists of closely mown grass to provide outdoor sports fields for St. Peter's school. The value of the simple landscape character lies in its openness and natural green (grass) surface.

The openness of the site makes a link with similar grassed pitches to the north and the more natural landscape of longer grass and trees to the west (although separated by an engineered earth flood bank), and to the rising lawns in front of St. Peter's school, hall and chapel, to the east.

The vast majority of existing grassland across the site would be replaced with synthetic surfacing across the pitches and courts, plus hard-standing and tarmac across the grounds maintenance yard, access road, pavements, and car park. The development would introduce cars and vehicle movements into the site. Each sporting facility would be fenced. The development includes the addition of man-made vertical elements – namely metal weldmesh fencing and lighting columns, both of various heights. The quantity, material, and height of the proposed fencing, and the extent of man-made surfacing would result in a development of a notable scale. The proposed development includes the areas currently taken up with existing all-weather tennis courts and sports pitch at the southern end of the site.

The existing tennis courts and all-weather pitch provides a good illustration of the significant change in character that results from the introduction of artificial surfacing and fencing. The resulting scene is a landscape by way of it being the outdoors, but it is unnatural in its materiality and appearance. It is a functional hardscape with little amenity or scenic merit.

Therefore, the proposed development would cause significant harm to the landscape character of the site. The impact on the wider landscape character would be limited, but the site's values in its contribution to the interconnectedness of natural openness beyond the site would be reduced.

Views

There are footpaths of varying status around three sides of the site, plus free access across the riverside open space. These pedestrian routes include: the riverside footpath (including cyclists), and a recently created informal path running parallel with it; the top of the flood bank (recently increased in height); the footpath running

along the northern perimeter of the riverside POS and the application site.

The latter links the riverside paths with Westminster Road and The Avenue on to Clifton; Westminster Road connects with Water End and Homestead Park. The footpath along the eastern perimeter of the application site links to North Parade/Queen Annes' Road and Bootham. Pedestrian and cycle access then continues to Marygate car park, the station/river or to Marygate, Museum gardens, the river.

This interconnectedness illustrates the significance of the footpaths around three sides of the site as both practical movement corridors and recreational corridors for a high number of pedestrians - residents of the city (local and further afield), visitors, employees, and pupils.

Views from the surrounding footpaths and open space are therefore considered to have a high sensitivity.

Views from flood bank

The linear route along the top of the flood bank is not a public footpath but there is free access across the entire open space, and it is a popular route for e.g. dog walkers because of the elevated aspect.

Due to the raised level of the flood bank there are clear views of the application site. Therefore the content of the development would be clearly visible.

On reaching maturity the proposed tree planting could provide some attractive visual interest and would soften the appearance of the overall development. Nonetheless, the loss of simple natural openness and views across the site would be significantly harmed.

From this elevated location there are views of St. Peter's school and the towers of York Minster. Views of these listed buildings are already interrupted by foreground buildings within the school grounds, but the proposed development would introduce more man-made constructions that would increase the detrimental effect.

Views from riverside footpaths and open space

The potential visual impact of the proposed development is reduced from the riverside, from where the sense of space is not the same as from the footpath along the north and the east side of the site because the flood bank blocks direct views of the school grounds. The flood bank does not however completely screen the tops of the school buildings or the fencing around the existing outdoor sports facilities. Using the existing sports facilities as a guide, there would be views of the fencing and the lighting columns from the riverside footpaths/open space.

The top of the proposed grounds maintenance shed would also be visible and is of a more solid form. The canopies of the mature trees in the northwest corner of the site would provide some screening of this construction in the summer months.

There would be a harmful impact to the views from the lower levels of the riverside open space – mostly due to the addition of lighting columns, fencing, and the loss of a group of trees. This would not cause significant harm to the enjoyment of the open space (with exception from the top of the flood bank) because the focus is largely on

the immediate open space and the river. However, the quality of views to St. Peter's school would be further diminished.

The train line on the opposite bank of the river, runs along a higher level than the open spaces on either bank of the river Ouse, so it follows that there would be clearer views of the site from the train.

Views from northern footpath

There is an obvious sense of openness over the dense trimmed native hedge along the footpath along the northern boundary of the site by way of an absence of buildings and other structures. Through the winter tracery of the hedge, the natural grass is visible. Although it is uniform short grass, it is still a natural green surface that makes connections with the open space beyond the site.

The proposed grounds maintenance building would be located immediately adjacent to the YW maintenance track and thus very close to the northern footpath from where it would be visible.

Thus, there would be a loss of the sense of openness and connection between the natural playing fields either side of the path.

Views from eastern footpath

The existing hedge that borders the footpath provides good screening of the site in its current format. However, as for the northern footpath, there is a sense of the openness beyond the hedge. The proposed road and pavement and associated lighting, and car movements would alter the experience along this path, which is currently relatively tranquil. The proposed tree planting would provide some mitigation by way of a potentially attractive new landscape element towards the south-eastern part of the site. However, the more northerly proposed tree cover is set further away and so would be of limited benefit from this footpath.

Lighting

The number, height, and locations of the lights – flood lighting, wayfinding lighting, and security lighting - would have an additional visual impact during operational hours of low natural light and hours of darkness, especially in the winter months when artificial lighting may be required from mid-afternoon onwards, depending on the exact time of year. There is no lighting across the grass fields at present.

Planting Plan L_002

The proposed tree planting would provide natural visual interest within views of the site and would provide some visual mitigation within that part of the site, but it would not mitigate the loss of open space and the risk of harm to the two existing protected trees.

The proposed tree planting should include larger tree species wherever space allows – which appears to be in most locations – in order to maximise the visual effect and environmental benefits of robust tree cover.

Conclusion

In respect of the protection and future wellbeing of the Horse chestnut at the end of

West Minster Road, and the veteran Willow to the northeast of the site, (both subject to tree preservation order CYC204) the proposed development presents a significant residual risk of harm.

In respect of impact on Landscape character, the proposed development would cause significant harm to the relatively natural openness of the site and its interconnectedness with adjacent open spaces.

The proposed development would cause harm to views from the surrounding footpath network, in respect of the sense of openness, especially in association with the river Ouse corridor and the adjacent playing fields and lawns of St. Peter's school; and also in respect of views of the city which include a number of listed buildings most immediate to the site, and also York Minster in views towards the city centre.

It would cause significant harm to the character of the site and significant harm to views from the flood bank.