

York Local Plan Preferred Options – Summary Of Responses
Section 16: Design & the Historic Environment

April 2014

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
General	<p>Comment - is this the right title? It is about more than 'design in the historic environment' and more about 'conservation and the historic environment' Alternative titles might be 'Conservation and the Historic Environment', or simply The 'Historic Environment', as in Chapter 4 of the Development Control Local Plan. Section 16 of the Local Plan Preferred Options draft, as with the whole document, focuses almost exclusively on the historic City of York and makes few references to the circumstances of the surrounding villages. The document is worded in such a way that it often seems only the historic city is referred to and the surrounding villages, part of the local authority area, are disregarded. It is suggested there should be a general statement defining the terminology used to refer to the contrasting parts of the Local Authority area, and that these definitions should be used consistently throughout the whole Plan document. An appropriate place for the definition to be set out would be in Section 2, Spatial Portrait in the sub-section entitled Geography. An additional paragraph could be inserted along the following lines: "In this Document, the term 'historic city' is used to denote the urban City of York as defined by the current inner edge of the Green Belt. The term 'rural York' refers to the surrounding villages in their more rural setting."</p>	88/12798	Conservation Area Advisory Panel
	<p>Comment – these several policies are likely to benefit from the input of many Voluntary, Community and Social Enterprise (VCSE) organizations bearing specialist knowledge, skills and experience of the subject matter. Would like to offer to broker links with such organizations after the end of this first phase of consultation, especially if the initial response appears insufficient in some areas; in order to improve the outcome of the final local plan submission.</p>	178/13906	York Council for Voluntary Service
	<p>Comment – plan should include a Policy for considering development proposals which may affect them (see also comments recorded under separate Heritage Topic Paper and Heritage Impact Appraisal).</p>	238/14111	English Heritage
	<p>Support – plan should provide local policy to guide new development in relation to designated and non-designated heritage resources. Comment – plan needs to provide local policy in regard to preserving York's villages. These very settled communities need protection under the Plan to preserve their physical, rural, agricultural and industrial heritages and their social community heritages.</p>	1457/17418	
	<p>Objection – more could still be done to protect the green belt and enhance the river frontages.</p>	2416/6664	

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
General continued	Support – in full agreement with the need to enhance the special natural/built environment. Particularly support the Design Guide for York City Centre and Surroundings and would like to see new development to be high quality and sympathetic to its surroundings. In complete agreement with Section 16.	2765/7307	
	Comment – the Natural Environment is also our heritage. There is no GIS or Living Landscape design codes or guidance. Also there is no Historic Landscape Character data.	4819/14316	York Environment Forum (Natural Environment Sub Group) & Treemendous York
	Comment – a balance needs to be struck between the amount of projected buildings in the City Centre and the use of land for housing. Too much emphasis is placed on heritage and visitors at the penalty of ordinary residents who are having to move further and further out of the city with the resultant need for more services and infrastructure. We need to keep the major heritage sites but there are far too many at the moment and no-one is really prepared to challenge their status.	5628/13250	
	Comment – this section of the plan is obviously a vital central part of the whole purpose of a plan for York and its unique 2,000 year history of continuous occupation. Strongly support the overall approach including the Landscape Character Appraisal, the Historic Core Conservation Area Appraisal and the Streetspace Strategy and Guidance. There should be more reference to the York New City Beautiful Vision and a long term delivery plan for key enhancements to maintain and upgrade the heritage assets, public spaces, parks etc in the city. The would help potential developers to identify opportunities that fit in with the long term plan and vision rather than this being seen as a restriction on development.	6518/16411	York Green Party
	Support – agree with the preferred approach. Objection – there should also be policies to preserve the historic nature of York’s villages.	6519/16483	Cllr Jenny Brooks
	Objection – concerned about the lack of any general policy or policies in relation to design and amenity. Policies GP1 and H7 are two of the most commonly used policies in the Development Control Local Plan but there appears to be no equivalent policies in the new local plan. Whilst design in the historic environment is covered can find no reference to design standards outside of these areas which is also of importance. It could result in a lowering of overall design standards through omissions. ‘Amenity’ and the impacts of new development of all types on third parties are also fundamental considerations in the planning process but are conspicuous by their absence. They are key to helping to build sustainable communities. Whilst there is reference to these matters in the NPPF they should be represented by specific policies in the Local Plan.	6520/16493	City Of York Council Development Management

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy DHE1 Design And Historic Environment	Support – encouraged that the Plan recognises the importance of strategic views of the City from its outskirts.	69/13848	Murton Parish Council
	Objection - only the 'historic city' appears to be implied here, with no consideration of 'rural York' where many of the villages have a conservation area in their centre. Add new criterion "h) internal fixtures and fittings". Should there be some guidance on the introduction of energy efficiency improvements?	88/12799	Conservation Area Advisory Panel
	Support – agree with keeping York Minster in prominent view from a large number of sites when approaching York by road, path or riverside.	91/12845	Ramblers Association (York Group)
	Support – particularly endorse the final Paragraph of the Policy. Given the importance of York's historic environment, it is absolutely right that development proposals that fail to take account of York's special qualities should be refused.	238/14095	English Heritage
	Comment – it is time they started putting up some iconic modern buildings and houses, rather than stick with the appalling faux Victorian designs that currently seem to be the standard for most new buildings in York.	1261/17143	
	Comment – the spirit is welcomed but there is not a good track record in permitting developments that affect the scale of surroundings. Thus there will be little confidence that the new policy will bring involvement.	1422/17378	York Merchant Adventurers Company
	Comment – although the concept of the setting of the historic and natural environment is implicit throughout the document, and is specifically referenced in many of the policies within this section, it is not mentioned within this policy. Feel that this policy might benefit from specific mention of the term 'setting'.	1491/17449	National Trust
	Support – generally supportive of this policy and consider it to set out an appropriate framework for determining the design implications of development. Comment – Would however like to see criterion (e) moved to the top of the list under criterion ii in order to ensure it is suitably prominent. The skyline of York and distant views of the city are of strategic significance and therefore particular importance. A prominent position within the Policy is therefore appropriate.	1592/17605	York Civic Trust
	Support – endorse this policy, especially the promotion of high quality standards of contemporary design (ii), which is echoed in paragraph 16.2.	1665/12960	York Environment Forum
	Support – the need to preserve the quality of the historic environment. Comment – need to ensure that the design requirements proposed through this policy are not so onerous that they unnecessarily restrict otherwise sustainable development from coming forward. Objection – this policy concludes by stating "Development proposals that fail to take account of York's special qualities and the opportunities for improving and enhancing	1705/9790	Gladman Developments

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	the character and quality of an area will normally be refused.” This element of the policy lacks clarity and potentially provides a ‘catch all’ approach in relation to developments that do not want to see happen. Concerns with regards to how this policy will be apply in a consistent manner.		
Policy DHE1 Design And Historic Environment continued	Support – policy is to be welcomed, and it is hoped it will be vigorously maintained.	2416/6665	
	Support – agree with the preferred approach.	5178/12360	
	Comment – much of York’s deserved reputation as a great tourist destination is because of its fantastic heritage. Developments must take this into account to conserve the historic environment and complement it.	5754/13595	
	Comment – although agree in general terms with the preferred approach consider that the proposed plan’s policy of hyper growth presents a clear and present danger to York’s historic environment.	6508/17681	City Of York Council Conservative Group
	Support - have no objection to the Preferred Approach as it could be applied whichever growth option is adopted.	6516/16337	City Of York Council Liberal Democrat Group
Para 16.01	Objection - in the supporting text at paragraph 16.1 reference should be made to the villages, and Conservation Area Appraisals and Village Design Statements, where they exist. Relevant documents for analysing the character and significance of the ‘historic city’ and surrounding villages should include the relevant Statutory Lists.	88/12800	Conservation Area Advisory Panel

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy DHE2 Heritage Assets	Objection – should clarify what is meant by “York’s historic environment”.	88/12801	Conservation Area Advisory Panel
	Objection – policy needs to make it clear that local heritage assets will have weight/be a material consideration in planning applications.	192/14009	
	Comment – concerned about the impact which the preferred development strategy and, in particular, some of the areas which have been chosen as future development sites, are likely to have upon elements which contribute to the special character and setting of the historic City. Whilst it is quite clear that some of the sites should not be developed because of their impact upon the historic environment, for a number of the others, however, there may be potential for some development to take place that would not harm the special character or setting of York. There needs to be a more robust assessment of the impact which the development of these sites might have upon the six principle characteristics of the historic City which are set out in the Heritage Topic Paper. Consequently, it would be worth reviewing whether or not this Policy is needed.	238/14033	English Heritage
	Comment – need to make sure that heritage is protected against anything that challenges it.	525/16642	
	Support – strongly support this policy, and the reference to the need for detailed evidence and a heritage statement to accompany development proposals.	1491/17450	National Trust
	Support – agree that the Policy is the most appropriate approach to conserve and enhance heritage assets, and to ensure the impact of development on a heritage asset is suitably assessed. Therefore welcome this policy.	1592/17606	York Civic Trust
	Support – policy is to be welcomed, and it is hoped it will be vigorously maintained.	2416/6666	
	Support – agree with the preferred approach.	2846/7561	
	Comment – have the implications of new build on the city centre been considered?	2849/7586	
	Comment – would like to propose/nominate that the trees that line both Wetherby Road and Beckfield Lane are protected as part of the Local Heritage List for York. The mature trees in both streets come under the criteria of Townscape and Landscape Significance – trees, including avenues, special groups and single landmark trees as well as Community Significance.	4370/11323	
	Objection - the plan needs to provide local policy in regard to preserving York’s villages very many of which have 2000 year old settlement patterns, 1000 year old continuously occupied property sites and 300 year+ old properties. These very settled communities need protection under the Plan to preserve their physical, rural, Agricultural and industrial heritages and their social community heritages.	5178/12361	

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy DHE2 Heritage Assets continued	Comment – more weight to the historic character of York should be given, should ask York Civic Trust for their views on how to maintain York’s historic character and incorporate that into the Local Plan.	5263/14359	
Para 16.03	Objection - amend “Other sources of evidence will include conservation area appraisals, village design statements, <i>Statutory Lists of Buildings of Architectural or Historic Interest</i> , <i>the List of Local Heritage Assets</i> , documentary evidence,…” etc.	88/12802	Conservation Area Advisory Panel
Para 16.05	Support – warmly welcome the proposals to include a local heritage list in addition to the national heritage list, allowing that which is important to those in York but not necessarily global historians to be identified and to some extent protected and highlighted by York’s own population. The specifics on how it comes about are not of great importance as long as it represents a holistic view across the community and cultural heritage assets (not merely historical and architectural).	525/16643	
	Support - the concept of a Local List and a democratic process for identifying the special qualities of buildings and spaces that have local significance that need to be considered in development proposals.	6518/16411	York Green Party

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy DHE3 Landscape And Setting	Objection – could be improved by including the ambition to enhance and improve biodiversity in the city centre and also the sustainable management of water runoff by Sustainable Urban Drainage schemes.	42/11713	Yorkshire Wildlife Trust
	Objection – the Landscape Appraisal carried out for York City Council by University of Sheffield found that the landscape west of Copmanthorpe was perhaps the highest quality landscape surrounding the city.	57/12623	Copmanthorpe Parish Council
	Support – minimising light pollution from sites old and new.	91/12847	Ramblers Association (York Group)
	Support – ensure that the landscape of the City and its wider setting is safeguarded.	238/14096	English Heritage
	Support – welcome Policy DHE3 and believe it to be an appropriate approach.	1592/17607	York Civic Trust
	Objection – wish to see the following included in this policy: ‘conserve and enhance biodiversity’ and ‘take a proactive approach to incorporating green infrastructure in the public realm’.	1665/12961	York Environment Forum
	Objection – in particular the use of the term ‘substantial’; this is supposed to be evidenced based and as such the landscape detail and planting may not need to be substantial based on the findings of the evidence base.	1705/9791	Gladman Developments
	Objection – in terms of the level of detail of supporting information to be required with planning application it is considered that a blanket approach across all applications is overly onerous and a statement should be included that, where this information is required, these should be commensurate to the scale and complexity of development proposals, and will be requested specifically during pre-application discussions if needed.	1785/9868	Jones Lang LaSalle (LaSalle UK Ventures Property)
	Support – policy is to be welcomed, and it is hoped it will be vigorously maintained.	2416/6667	
	Objection – need Living Landscape Design Guidance to raise standards.	4819/14298	York Environment Forum (Natural Environment Sub Group) & Tremendous York
Para 16.06	Objection - village landscape should be included here, with mention of village greens and street verges, which also have historic interest.	88/12803	Conservation Area Advisory Panel
Para 16.08	Objection - does the “rural environment” include village streetscape?	88/12804	Conservation Area Advisory Panel

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy DHE4 Building Heights And Views	Support – new developments outside the city centre, as well as inside, should protect these views.	91/12846	Ramblers Association (York Group)
	Support – welcome the inclusion of a requirement that the City’s key views as defined in the York City Historic Core Conservation Area Appraisal will be protected.	238/14097	English Heritage
	Support - this policy, obtaining maximum building heights in order to not obscure distant views of the York Skyline.	1589/17568	Nether Poppleton Parish Council
	Support – agree that the Policy is the more appropriate approach. Objection – a need to acknowledge within the Policy the relationship between setting, mass and height with key views of the city. Simply protecting key views is not enough, therefore suggest an additional criterion is introduced to the Policy along the lines of “ensure the height, scale and mass of proposed development will not adversely affect the setting of key views, but will instead protect the setting.”	1592/17608	York Civic Trust
	Support – supports the policy. Comment – wish to stress that realising opportunities for creating or revealing new public views (iv) should not be at the expense of removing significant amounts of green infrastructure and should categorically not be used as an excuse to take out trees.	1665/12962	York Environment Forum
	Support – policy is to be welcomed, and it is hoped it will be vigorously maintained.	2416/6668	
	Comment – should consider the skyline of York City Centre in particular.	2660/7040	
	Comment – iconic views of the Minster should be maintained.	5754/13596	
Para 16.10	Objection - in the Central Historic Core Conservation Area Appraisal (CHCCAA) the prominence of the Minster in the historic City’s skyline is assessed as one of the most special and precious aspects of York and its townscape. It is therefore suggested the wording of the present text in this paragraph (the majority of York is low rise) is replaced by that in the CHCCAA, as follows: “Within the historic core the majority of buildings are no higher than 4 storeys. The general presumption within the ‘historic city’ should be against any development over four storeys”.	88/12805	Conservation Area Advisory Panel
Para 16.11	Objection - include the following recommendation from the Central Historic Core Conservation Area Appraisal: “Taller buildings beyond the ‘historic city’ could have a significant impact on the character and appearance of a number of Key Views. There should be a general presumption against buildings taller than five storeys.”	88/12806	Conservation Area Advisory Panel

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy DHE5 Streets And Spaces	Objection - sub paragraphs. i & ii.; both appear to apply only to the streets and spaces of the 'historic city', and not to the village streets and spaces in 'rural York'.	88/12807	Conservation Area Advisory Panel
	Objection – public space and footpaths should be incorporated into developments in accordance with DEFRA Guidelines.	91/12848	Ramblers Association (York Group)
	Support – policy for York’s streets and spaces, especially the improvement of the public realm.	238/14098	English Heritage
	Comment – feel this Policy is an appropriate approach, but it should be cross referenced and related back to other policies in order to ensure it is not read in isolation.	1592/17609	York Civic Trust
	Support – welcome this policy and the promotion of pedestrian and cycle movement as a priority.	1665/12963	York Environment Forum
	Support – policy is to be welcomed, and it is hoped it will be vigorously maintained.	2416/6669	
	Objection – needs Living Landscape Design Guidance or codes to raise standards not included in the draft Streets and Spaces Strategy and Guidance.	4819/14299	York Environment Forum (Natural Environment Sub Group) & Treemendous York

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy DHE6 Conservation Areas	<p>Comment – national policy guidance makes it clear that the significance of a heritage asset can also be affected by development proposals within its setting. Suggested changes: Policy DHE7, line i amend to read: - “Development proposals within or likely to affect the setting of a Conservation Area will be supported where they: -”.</p> <p>Conservation Area Consent is due to be replaced later this year. Consequently, it would be preferable to amend the wording of this Paragraph. Suggested Changes: (1) Policy DHE7, final Paragraph amend to read: - “Demolition of buildings which make a positive contribution to Conservation Area will be resisted”. (2) Paragraph 16.19 amend to read: - “Permission for the demolition...etc”.</p>	238/14099	English Heritage
	<p>Objection – believe this policy is not comprehensive. Only refers to the first part of any assessment, which consists of assessing the special qualities of a conservation area. The Policy fails to mention the second part of any assessment, which is to assess the impact of development on the conservation area. An additional criterion is therefore required to address the requirement to assess the impact of development on the conservation area (paragraph 131 and 132 of the NPPF). The explanation to the Policy would benefit from expansion to refer to where a list of the conservation areas can be found, along with the actual conservation area appraisals. It would also be helpful if the supporting text to the Policy could also refer to why outline applications are inappropriate within conservation areas.</p>	1592/17610	York Civic Trust
	<p>Comment – recognise the need for sensitivity regarding design proposals for conservation areas, this should not overrule the need for appropriate energy-efficient features and insulation (and even renewable energy).</p>	1665/12964	York Environment Forum
	<p>Comment – why are there conservation areas; what was their purpose; what is their status; what plans for conservation that will be implemented?</p>	2358/6548	
	<p>Support – policy is to be welcomed, and it is hoped it will be vigorously maintained.</p>	2416/6670	
	<p>Comment – has the Conservation Area boundary, Green Belt boundary or village settlement boundary been moved in the vicinity of Elvington House? The maps are unclear.</p>	3063/12891	
Para 16.15	<p>Objection - are “designation statements” the same thing as the Conservation Area Descriptions which are included in the Development Control Local Plan? Where will they be found? Besides “conservation area appraisals”, many villages have prepared a Village Design Statement which should be a material consideration. Nor is the Central Historic Core Conservation Area Appraisal the only appraisal prepared for the ‘historic city’: omit “in particular the historic core”.</p>	88/12808	Conservation Area Advisory Panel

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy DHE7 Listed Buildings	Objection – refers to designated heritage assets. Include undesignated also in this policy (those on Local Heritage List).	192/14010	
	Support – sets out a good framework for managing change which could impact upon York’s Listed Buildings.	238/14100	English Heritage
	Objection – this policy is unnecessary. The plan would benefit from its deletion.	544/16751	
	Comment – will the converse be true? In that developments that detract from the value to the special architectural or history interest of the building and its setting, including key views, approaches and aspects of the immediate and wider environment that are intrinsic to its value and significance will not be permitted?	1422/17379	York Merchant Adventurers Company
	Objection – a third criterion should be introduced requiring an assessment of the impact of development on the listed building. Reference to the local list should also be included within this Policy or else a separate Policy should be introduced to address those buildings included in the Local Heritage List of York. Think it is appropriate to cross reference to the City of York Streetscape Strategy and Guidance within this Policy or elsewhere in the Section. It will add weight to the document being a material planning consideration in the determination of planning applications. A further cross reference should be made to English Heritage’s guidance on the extension of listed buildings. Even with these cross references we still have some concerns with the Policy and whether it provides an appropriate framework for the determination of planning applications affecting a listed building or its setting. Would like to ask the Council to review the Policy in light of experiences relating to the Castle/Piccadilly application and reflect on whether lessons learnt have been incorporated into the Policy.	1592/17611	York Civic Trust
	Support – the approach to the historic environment set out in draft policy DEH7.	1748/9848	Diocese of Middlesbrough
	Support – policy is to be welcomed, and it is hoped it will be vigorously maintained.	2416/6671	
Para 16.21	Comment – in explaining the content required for Heritage statements set out at paragraph 16.21 of the Plan this paragraph needs to reinforce the context that the level of detail to be provided ` should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance’.	1748/9849	Diocese of Middlesbrough

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy DHE8 Shopfronts In Historic Locations	Objection – add ‘colour’, so: “and are an appropriate scale <u>and colour</u> ”.	192/14011	
	Support – especially the protection that is given to the retention of high-quality or historic shop fronts.	238/14101	English Heritage
	Objection – consider that the Policy needs to include a more explicit explanation of what is meant by ‘sympathetically designed’ and ‘high quality materials’. At the moment it is unclear how this Policy adds local considerations to national guidance on advertisements. Introducing more explicit guidance will address our concerns and make the Policy locally distinct.	1592/17612	York Civic Trust
	Support – policy is to be welcomed, and it is hoped it will be vigorously maintained.	2416/6672	
Para 16.24 & 16.25	Objection - include references to the repair of dilapidated shopfronts, and to the alteration and/or repair of village shopfronts: with the loss of so many village shops, their shopfronts are becoming an increasingly rare feature often of social historic value and interest.	88/12809	Conservation Area Advisory Panel

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy DHE9 Advertisements In Historic Locations	Objection - sub-paragraph i.: insert "are of a scale, design... that will not cause harm to visual or residential amenity <i>or to historic fabric</i> , and will respect the appearance" etc.	88/12810	Conservation Area Advisory Panel
	Support - sets out a good framework for the control of advertisements.	238/14102	English Heritage
	Suggest "position" and "number" be added to list of criteria in (i). Second part of draft policy, subparagraph (a) is poorly worded and subparagraph (b) is wrong in law as introduces an assessment of "need". Local authorities may not concern themselves with the "need" for any particular sign or advertisement. This is a matter for the advertiser. Second part of policy could be improved and simplified by total replacement with: "Within conservation areas and on buildings identified as heritage assets, illumination will only be supported where the method of illumination (including wiring, fixtures and fittings) preserves or enhances the historic character and appearance of the building and area."	460/163	Chris Thomas Ltd Outdoor Advertising Consultants
	Support – welcome the detail incorporated into this Policy. Comment – could more locally distinct advice be provided, especially in relation to materials and finish? Would also like to see reference to how 'A' boards are inappropriate and will not be allowed within the street scene. Believe that they block pavements and cause tripping hazards.	1592/17613	York Civic Trust
	Support – policy is to be welcomed, and it is hoped it will be vigorously maintained. (e.g. over intrusive signage)	2416/6673	
Paragraph 16.26 - 16.29	Objection - paragraph 16.26 accurately reflects national policy advice. However, paragraphs 16.27-16.29 are overly prescriptive, selective and unnecessary, since the proper and only acceptable criteria for control are already identified in policy DHE9 (if amended as suggested). Paragraph 16.29 does not add anything and should be deleted.	460/164	Chris Thomas Ltd Outdoor Advertising Consultants
Para 16.27	Objection - amend "Advertisements should be designed and located to avoid conflict with the historic character and appearance of heritage assets, including conservation areas, <i>or damage to historic fabric.</i> "	88/12811	Conservation Area Advisory Panel

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Policy DHE10 Security Shutters In Historic Locations	Objection – need should be a requirement for all security shutters in sensitive locations.	62/12712	Fulford Parish Council
	Support – alternatives to Security Shutters in all streetscapes, not just historic locations.	91/12851	Ramblers Association (York Group)
	Support – sets out a good framework for the control of security shutters.	238/14103	English Heritage
	Support – policy is to be welcomed, and it is hoped it will be vigorously maintained.	2416/6674	

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Policy DHE11 York City Walls And St Mary's Abbey Walls ('York Walls')	Objection – could be improved by including the ambition to enhance and improve biodiversity in the city centre and also the sustainable management of water runoff by Sustainable Urban Drainage schemes.	42/11714	Yorkshire Wildlife Trust
	Comment – suggested changes: Policy DHE11, third Paragraph amend to read: - “Development proposals adjacent to, or likely to affect the setting of, the City Walls designated as Scheduled Monuments will only be permitted where: -” Comment – it would be preferable to include the need for a Heritage Statement as a separate Paragraph at the end of the Policy. Suggested changes: Policy DHE11: - (1) Delete Criterion i. (2) Add a new paragraph to read: - “Development proposals likely to impact upon the City Walls must be accompanied by a Heritage Statement that clearly assesses the impact which the proposals are likely to have upon the elements which contribute to their significance and the six principle characteristics of the City as identified in the Heritage Topic Paper.” Suggested changes: Policy DHE11, third Paragraph, fourth bullet-point amend to read: - “Designed not to cause harm to those elements which contribute to the significance of the Walls including their setting”. Should be of the highest quality design. Suggested changes: Policy DHE11, third Paragraph, add an additional Criterion to read: - “Of the highest design quality which, where possible, enhances or better reveals the significance of the walls”.	238/14104	English Heritage
	Support – supportive of this Policy. It sets out an appropriate approach to the conservation and enhancement of the Walls.	1592/17614	York Civic Trust
	Support – policy is to be welcomed, and it is hoped it will be vigorously maintained.	2416/6675	
Para 16.33	Comment – paragraph 16.33: In order to guide development in and around the City Walls, it is suggested that the City Council and English Heritage produce joint guidance which can be used as SDP. Paragraph 16.33, final sentence: Given the importance of the York City Walls, there should be a clear statement that proposals which harm their significance will not be permitted.	238/14105	English Heritage
Para 16.34	Objection - reference to the 'Friends of York Walls' is inappropriate as there are no comparable references elsewhere to numerous other 'Friends' and similar amenity groups. There is in any case no 'Friends' group for St Mary's Walls. Substitute " <i>community groups</i> " if necessary	88/12812	Conservation Area Advisory Panel

Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy DHE12 Archaeology	Objection - advice for archaeological sites outside the "historic core of the City of York" and the Area of Archaeological Interest should be included and made explicit. What does "the City of York area" comprise? Terminology to distinguish the 'historic city' from the surrounding villages, 'rural York' should be used.	88/12813	Conservation Area Advisory Panel
	Comment – whilst we support the inclusion of a Policy for archaeology, it would benefit from some revisions to more clearly articulate the approach to developments likely to affect archaeological remains. Suggested changes: amend Policy DHE12 as follows: - "Development proposals which would result in harm to Scheduled Monuments or other nationally important archaeological remains will not be permitted. Development proposals affecting other archaeological features and deposits will be supported where they are consistent with the following: - i In the historic core, they accord with the principle set out in the "York Development and Archaeology Study" or its successor. ii. Elsewhere, they are designed to avoid harm to archaeological deposits. Where harm is unavoidable, detailed mitigation measures... [include the remainder of the current Criterion iii of Policy DHE12]. Development proposals within the historic core or likely to affect archaeological remains must be accompanied by an evidence-based heritage statement that describes the significance of the archaeological deposits affected and includes a desk-based assessment and, where necessary, reports on intrusive and non-intrusive surveys".	238/14106	English Heritage
	Objection – this policy is unnecessary. The plan would benefit from its deletion.	544/16752	
	Support – agree with this Policy as an appropriate approach to protecting archaeological features and deposits. Comment – it would therefore be appropriate in this Policy to list the Scheduled Ancient Monuments in York or cross reference to a list to be included in an Appendix to the Plan.	1592/17615	York Civic Trust
	Support – policy is to be welcomed, and it is hoped it will be vigorously maintained.	2416/6676	
	Comment – the plan should note that there is no need to consult widely about the techniques that are best suited for interpreting the past. Three suggestions: 1. The high quality work the society have produced should be recognised and this statement amended since the funding for research is limited. 2. There should have been an obligation for all those who provide advice to the planners on behalf of developers and the city council to be accredited to a body that can impose a professional discipline and sanction those who fall short of the standards expected. 3. The scheme for archaeological excavation should be subject to public consultation and require the	5713/13464	Fulford Battlefield Society

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
	approval of an independent body before it is approved.		
Para 16.35 & 16.36	Objection - should mention the threat of damage to these highly sensitive organic archaeological deposits due to dewatering from intrusions, often at some distance from the deposits. This is a very real problem in York city centre.	88/12814	Conservation Area Advisory Panel
Para 16.37	Comment – copies of these reports should also be deposited with OASIS (the Online Access to the Index of Archaeological Investigation). Suggested Changes: Paragraph 16.37 line 3 amended to read: - "... York HER and OASIS".	238/14107	English Heritage
Para 16.38	Comment – given the importance of the archaeological resource, it is suggested: - (1) That the Council produce an SPD to help guide those proposing development in the City, and (2) The York Development and Archaeological Study" or its successor is also adopted as SPD.	238/14108	English Heritage

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy DHE13 Historic Parks And Gardens	Objection – could be improved by including the ambition to enhance and improve biodiversity in the city centre and also the sustainable management of water runoff by Sustainable Urban Drainage schemes.	42/11715	Yorkshire Wildlife Trust
	Comment – it is important that reference is also made in the Policy to: - (1) Safeguarding any important views out of these landscapes, and (2) Ensuring that proposals do not prejudice any future restoration. Suggested changes: Policy DHE13, (1) Criterion i amend to read: - “character, amenity, setting or key views into or out of the park”. (2) Criterion ii amend to read: - “... park or garden and do not prejudice any future restoration”.	238/14109	English Heritage
	Objection – this policy is unnecessary. The plan would benefit from its deletion.	544/16753	
	Objection – would like to see reference made to the need for a statement of significance and a heritage impact assessment to be submitted in relation to proposals affecting historic parks and gardens or their setting. Parks and gardens are historic assets and therefore demand the same level of consideration and assessment as other heritage assets.	1592/17616	York Civic Trust
	Support – this policy and parks and gardens play a significant role in flood migration. Comment – there may be exceptional circumstances, due to climate change, that may, over time, fundamentally affect and ultimately overwhelm their original design and function. Should that be the case then alternative designations may one day need to be considered and accommodated – e.g. the use of parks for food growing (as in war time) or even as sustainable urban drainage sinks.	1665/12965	York Environment Forum
Para 16.41	Support – policy is to be welcomed, and it is hoped it will be vigorously maintained.	2416/6677	
	Comment - should these parks and gardens be listed somewhere: and if so, does the list include the gardens at Goddards, in Tadcaster Road, by George Dillistone, and at Bishopbarns, St George’s Place, by Gertrude Jekyll?	88/12815	Conservation Area Advisory Panel

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Policy DHE14 City Of York Historic Environment Record	Comment – makes it clear that all assessments should be deposited with the HER once completed. Suggested changes: Policy DHE14 add the following additional Paragraph: - “Copies of all heritage statements and reports on archaeological interventions whether pre- or post-determination must be deposited with the City of York HER”.	238/14110	English Heritage
	Support – welcome this Policy as an appropriate approach to the use of the Historic Environment Record. Objection – would like to see reference made that the HER must be updated and enhanced rather than maintained. The HER is seriously outdated and not yet digital. Enhancing and updating the HER would aid access to ensure it is used to its full potential.	1592/17617	York Civic Trust
	Support – policy is to be welcomed, and it is hoped it will be vigorously maintained.	2416/6678	
Para 16.45	Objection – policy links missing– where are Living Landscape Design Guidance, Green Infrastructure Strategy, Tree Strategy or Trees in Development Sites SPD?	4819/14300	York Environment Forum (Natural Environment Sub Group) & Tremendous York

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Policy, Site, Table, Figure, Para etc.	Comments	Ref.	Name (where business or organisation)
Question 16.01	Comment – the plan needs to provide local policy in regard to preserving York’s villages.	59/12664	Dunnington Parish Council
	Support - definitely agree that the preferred approach should be as indicated i.e. to “provide local policy to guide new development in relation to designated and non-designated heritage resources.”	88/12816	Conservation Area Advisory Panel
	Support – agree with the preferred approach.	188/13947	
	Support – would support the development of local strategies in respect of Design and the Historic Environment.	190/13970	York Consortium of Drainage Boards
	Support – agree with the preferred approach.	943/16962	
	Support – agree with the preferred approach.	1109/17205	
	Support – fully support the section on the historic environment, and consider that this presents a strong set of policies which set out clearly the criteria for future development.	1491/17451	National Trust
	Support – the preferred approach to design and the historic environment.	1736/9830	Oakgate Group PLC