

Local Plan Pre- Publication Draft 2018 Summary of Consultation Responses

ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
<b>H1: Housing Allocations</b>				
4	H1	Comm	Given the predicted increase in traffic levels on the A64 described in the Transport Topic Paper , build-out rate on these larger strategic housing sites listed in Table 5.1 should be linked to any necessary capacity enhancements on the A64 and its junctions with the local primary road network.	Highways England
349	H1	Comm	Any allocation that contains playing fields or sport facilities needs to be consistent with policies HW3 and GI5 and para 74 of NPPF. Sport England would wish to avoid a situation where an allocation encourages the submission of a planning application to which we later have to object if we are consulted, in accordance with our statutory role. Sport England only examines the formal sporting use of a site. The Local Planning Authority should also consider other (non formal sport) uses that the site provides, such as informal recreation, kite flying, Frisbee, kick-about etc. The non-formal sporting uses should be considered in accordance with paras 73 and 74 of NPPF.	Sport England
1352i	H1	Comm	The council has not produced a detailed trajectory of housing sites to show a 5-year land supply position an developable sites for years 6-10. This policy should include more smaller site allocations around existing settlements to assist in meeting shortfall created on strategic sites which may be subject to delay. No evidence is provided in relation to delivery of sites much as lead-in times, reasoning on annual delivery rates or density assumptions which should be revised downwards to ensure capacity is not artificially inflated. In the absence of this information it is difficult to ascertain whether the sites should be included in the supply.	Lichfields on behalf of Wakeford Properties
1675i	H1	Comm	Policy needs redrafting to include timescales rather than phasing.	Johnson Mowat on behalf of Taylor Wimpey

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5167	H1	Comm	Need for clarity over the 328 dwelling figure for Hungate to ensure that this is consistent with the consented and future proposals.	Lichfields on behalf of Hungate (York) Regeneration Ltd
10379	H1	Comm	Objects to University of York taking houses which could be young people's first houses.	
12655	H1	Comm	The potential for ST35 to come forward in the short-term should be acknowledged in this policy.	GVA on behalf of DIO Estates (MOD)
13093	H1	Comm	This is a high density proposed for the development when previously a lower figure was used through planning applications.	O'Neill Associates on behalf of Jorvik Homes
13637i	H1	Comm	<p>The second paragraph of this policy is welcomed setting out the criteria on which an application will be approved on an allocated site in advance of its phasing. It is essential that any alteration to phased development will not prejudice delivery that may detrimentally impact on the 5-year housing supply.</p> <p>Land supply across the York Housing market is discussed in paragraph 5.16 and is of concern to CPRENY as CYC has worked with all neighbouring authorities under the duty to co-operate as required by NPPF. It is welcomed that York does not need to make additional land available to address shortfall elsewhere. However, the impact of housing developments elsewhere will impact detrimentally upon the setting and infrastructure provisions of the City. Some population figures used by GL Hearn to provide the OAN may result in residents using York to commute elsewhere, CPRENY are concerned about potential double counting and an artificially high OAN has been produced, CYC should ensure this is not the case.</p>	CPRE - North Yorkshire

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238	H1	Obj	Concerned that development of several of the identified sites could potential result in harm to elements which contribute to York's historic environment. Advises that the plan provide more specific development principles within which development should take place, and append these to the Plan. Such an approach would provide more certainty to both developers and local communities about what will and will not be permitted on each of these sites.	Historic England
431	H1	Obj	In the list of the planning permissions that make up the Council's estimate of un-implemented planning permissions, the figure of 3,578 includes 542 student units which should not be included in the housing provision figures. This reduces the commitments figure to 3,036. A further discount of 10% should be applied to account for non-implementation of a proportion of these commitments, giving a more robust figure of 2,732 dwellings for outstanding commitments.	O'Neill Planning Consultants Representing Shepherd Homes
431	H1	Obj	The Councils assessment of housing provision includes an allowance for 169 windfall per annum from year 4 of the plan – 1,859 units in total. Guidance in paragraph 48 of the NPPF is that windfalls can be included in the calculation of five-year supply, i.e. not as a source of housing supply across the plan period. This is because the supply of windfalls is variable and including it across the plan period does not provide the certainty of delivery compared with actual allocations. In addition, once the plan is adopted and housing allocations confirmed, the pressure to deliver housing through windfalls should decrease. Other Authorities, most recently Scarborough Borough Council, have adopted this approach whereby a windfall allowance is identified across the plan period but treated as a flexibility allowance to the allocations and not included in the housing provision. The Scarborough Local Plan Inspector has endorsed this approach.	O'Neill Planning Consultants Representing Shepherd Homes

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431	H1	Obj	<p>The representors assessment of 5-year supply shows that its estimate of supply arising from the proposed allocations and existing commitments in the first five years is 5.13 years using the Council's figures (housing requirement of 867 dwellings per year) and 3.06 years using the representors figure (using Government requirement of 1,070 dwellings per year). The scale of the deficit in land supply identified by the 5-year calculation is significant not only in terms of the need to identify more land but also in terms of the longevity of undersupply. By any reasonable assessment, there has been a significant shortfall in the provision of housing every year since 2007/08 – 10 years in all.</p>	O'Neill Planning Consultants Representing Shepherd Homes
536	H1	Obj	<p>Table 5.1 (H1) shows that the Council is allocating 16 strategic sites and 20 smaller (Non strategic) sites, giving a yield of 1,497 dwellings on the non-strategic sites and 13,366 dwellings on the strategic sites. Table 5.1 shows that many of these sites will deliver part of their capacity beyond the end of the Plan period, although it doesn't specify how many within / beyond the Plan period. It is not clear how many dwellings will be built within the Plan period. Indeed, there is a total lack of evidence provided within the Local Plan &amp; the supporting evidence base on specific site phasing, lead in times &amp; delivery rates. As currently drafted the Local Plan approach to housing supply is considered to be unjustified due to the lack of evidence and inconsistent with paragraph 47 of the NPPF. The Plan's Spatial Strategy relies on the delivery of large strategic sites to provide the majority of the housing requirement - however, they often have complex masterplanning issues which will affect lead in times (Rep includes national research on lead in times across the country). The Plan has 10 strategic sites which, according to national research, would not deliver until later in the plan period - this should be indicated in the housing trajectory. Additional smaller sites should add flexibility. Also, lack of info on how densities calculated.</p>	Lichfields obo Keyland Developments

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
540	H1	Obj	<p>The provision currently included in the draft Plan does not reflect the evidence provided by the Council's own consultants or the recently published national methodology for calculating housing need. Additional housing sites will almost certainly be needed to meet the requirement when properly recalculated, particularly since the Plan proposes that housing needs should be met entirely within the Council's administrative area. Additional small and medium sized sites need to be allocated to ensure delivery of the requirement. Rep has attached presentation pack delivered to the House of Commons Communities and Local Government Committee in September 2016 on behalf of Daniel Gath Homes and a Press Notice of the Committee Report (29th April 2017) which consider the issues. Cannot see any justification for proposing that allocated sites should be phased - if it is to reflect technical considerations / lead in times, it is unnecessary. The policy is so heavily caveated with instances where permission may be granted for sites ahead of the identified phasing - the policy is very unlikely to be effective.</p>	Jennifer Hubbard Town Planning Consultant
1498	H1	Obj	<p>It is not clear what the Council intend to do should developers bring forward suitable sites quicker. The Council has not produced a detailed trajectory or assessment showing 5 year land supply position and developable sites for years 6-10. It is not possible to consider the suitability of the portfolio of sites as there is no evidence the sites are deliverable or developable. There is no evidence of lead-in times, annual delivery rates and the density assumptions are not validated and should be revised downwards to be realistic. Delivery of strategic sites is overestimated and there is no justification for windfalls. This approach is not consistent with National Policy, is unsound, not justified and cannot be effective.</p>	Lichfields on behalf of Bellway Homes
1661	H1	Obj	<p>Policy should be amended to include Brecks Lane, Strensall as a housing allocation.</p>	Lichfields on behalf of Linden Homes

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1705	H1	Obj	There is no justification for the strict adherence to the phasing of development unless it is fully justified by the need to deliver significant infrastructure before development is commenced.	Gladman Developments
5410iii	H1	Obj	Many flats in a small area would lead to a poor quality of life for residents and cause social issues.	
6046	H1	Obj	<p>The way in which the Plan notes housing delivery beyond the Plan period of 2033 is confusing and not in conformity with the NPPF. The Plan risks being unsound because it intends to allocate land for development beyond the scope of the time frame in which the policy is intended to apply. Therefore, it risks being found unsound. Table 5.2 sets out the minimal annual housing target of 867 dwellings from 2017/18 to 2023/33 i.e.. 13,872 (in line with Draft policy SS2). When the shortfall is taken into account, this increases the housing target to 923 dwellings per annum i.e.. 14,768. Even with the shortfall, this is still below the recommended figure suggested by GL Hearn in the SHMA Update. As a result, it is considered that the minimum target needs to be revised upwards to reflect the housing target identified by the Council's own consultants. The Government published a White Paper on 14th September 2017 entitled 'Planning for the right homes in the right places: Consultation Proposals'. Based on the Governments methodology and calculations, the annual housing requirement for the City of York Council is 1070 dwellings per annum, a 23% increase on the 867 proposed by the Council. In light of the above, the Council is not allocating enough land for housing and further land will need to be identified through a Green Belt Review.</p>	Directions Planning Consultancy

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6355	H1	Obj	<p>We understand the proposed housing target is expected to be delivered from a combination of allocations (14,863), (some of which are to be delivered after the Plan period), windfall sites (169 per annum, or 2,704 over the Plan period), and extant planning permissions (3,758). Table 5.1 of Draft Policy H1 sets out the number of houses expected to be delivered from the proposed housing allocations. Given that some of the proposed growth is expected to be delivered outside of the Plan period, but from allocations identified as part of the Plan period, it means it is not possible to make a direct comparison between the identified housing need and the actual housing target. As we have stated in previous representations, the way in which the Plan notes housing delivery beyond the Plan period of 2033 is confusing. The NPPF only requires development to be identified during the Plan period. We therefore believe that the Plan is not in conformity with the NPPF because it intends to allocate land for development beyond the scope of the time frame in which the planning policies set out in the Plan are intended to apply. We are of the view that any Inspector would be concerned with this approach because it is attempting to stretch the strategy beyond the intended Plan period, which is an approach that is simply unsound.</p>	<p>Directions Planning on behalf of Askham Bryan College</p>

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6355	H1	Obj	<p>Comment references the SHMA Update, GL Hearn report, new DCLG housing methodology, the conclusion being: strongly suggest that the City of York Council pursue a revised figure of 17,120 dwellings i.e. an increase of 2,352 dwellings. As the Local Plan is expected to be submitted for Examination after March 2018, the revised methodology will apply. The appointed Planning Inspectors will therefore apply the proposed new methodology as a baseline for assessing five year housing land supply if the Council did not chose to do so itself. In its current form, the Local Plan is likely to be found unsound as a result of the proposed housing targets, unless the Government's calculations are integrated into the Plan now. The last Local Plan Examination was a shambles and it appears the next may well be too if the Council continues to insist on ignoring DCLG's expectations.</p>	<p>Directions Planning on behalf of Askham Bryan College</p>
6355	H1	Obj	<p>The proposed housing target is expected to be delivered from a combination of allocation (14,863) some of which are to be delivered after the Plan period, windfall sites (2,704) and extant permissions (3,758). Given that some of the proposed growth is expected to be delivered outside the Plan period, but from allocations identified as part of the Plan period, it means it is not possible to make a direct comparison between the identified housing need and the actual target. Therefore, the way in which the Plan notes housing delivery beyond the Plan period of 2033 is confusing and not in conformity with the NPPF because it intends to allocate land for development beyond the scope of the time frame in which the planning policies set out in the Plan are intended to apply. This approach is unsound. The SHMA Update (September 2017) prepared by GL Hearn uses a baseline figure of 867 dwellings per annum for the Plan period, and recommends a 10% allowance to take into account market signals and affordable housing need, which has the effect of increasing the housing figure to 953 per annum. Table 5.2 of policy H1 sets a minimum annual target of 867 dwellings.</p>	<p>Directions Planning Consultancy OBO Askham Bryan College</p>



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6355	H1	Obj	<p>This is well below the figure recommended by GL Hearn and as a result, it is considered that the minimum target needs to be revised upwards in order to address the identified housing need. No reasoned justification is made for the lower figure. Additionally, it is noted that the housing delivery of 867 per annum would only meet the demographic need of the City and would not address the City's affordable housing issues - by failing to meet this demographic, the Plan will only serve to exacerbate current imbalances in the population profile of the City. The Government published a White Paper on 14th September 2017 entitled 'Planning for the right homes in the right places: Consultation Proposals', which includes a standard methodology for calculating local authority housing need - in York's case, the requirement will rise from 867 dwellings per annum to 1,070 (17,120 dwellings for the Plan period). It is strongly suggested that the Council should revise its figures to match the requirements in the White Paper, as the White Paper will come into force in March 2018, before the Plan is submitted. In its current form, the Plan will be found unsound unless the Government's calculations are integrated in the Plan now. It will therefore be necessary to allocate additional land for housing.</p>	<p>Directions Planning Consultancy OBO Askham Bryan College</p>
6663	H1	Obj	<p>NPPF requires local planning authorities to maintain a 5-year housing land supply. The Plan does not provide sufficient sites to deliver this, meaning that the Council would have to undertake a review of the Plan to identify additional sites before the end date of the Plan. If there us no 5-year housing supply there will be significant pressure to amend the greenbelt in 2032 or earlier.</p>	<p>DPP obo Linden Homes Strategic Land</p>
9381	H1	Obj	<p>Not enough land is identified to set an enduring Green Belt for the first time.</p>	<p>DPP Planning on behalf of Linden Homes</p>

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9381i	H1	Obj	<p>No housing trajectory has been provided to show annual delivery over the plan period; this method should be provided. There is also insufficient evidence on the assumptions used in relation to lead-in times and delivery rate assumptions, particularly for the Council's unimplemented permissions. There is a significant shortfall of sites in the 5-year supply when compared to the suggested revised OAHN. As a result, it is not considered that the plan is sound. It is considered that the plan will not be able to demonstrate a 5 year housing land supply and therefore the Green Belt will have to be reviewed early. Lack of safeguarded land will stifle housing growth. Evidence attached includes a Technical Report of Housing Issues.</p>	DPP Planning on behalf of Linden Homes
9883iv	H1	Obj	<p>In the list of the planning permissions that make up the Council's estimate of un-implemented planning permissions, the figure of 3,578 includes 542 student units which should not be included in the housing provision figures. This reduces the commitments figure to 3,036. A further discount of 10% should be applied to account for non-implementation of a proportion of these commitments, giving a more robust figure of 2,732 dwellings for outstanding commitments.</p>	O'Neill Planning Consultants representing SBO Lands Ltd.

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9883iv	H1	Obj	<p>The Council's assessment of housing provision includes an allowance for 169 windfall per annum from year 4 of the plan – 1,859 units in total. Guidance in paragraph 48 of the NPPF is that windfalls can be included in the calculation of five-year supply, i.e. not as a source of housing supply across the plan period. This is because the supply of windfalls is variable and including it across the plan period does not provide the certainty of delivery compared with actual allocations. In addition, once the plan is adopted and housing allocations confirmed, the pressure to deliver housing through windfalls should decrease. Other Authorities, most recently Scarborough Borough Council, have adopted this approach whereby a windfall allowance is identified across the plan period but treated as a flexibility allowance to the allocations and not included in the housing provision. The Scarborough Local Plan Inspector has endorsed this approach.</p>	O'Neill Planning Consultants representing SBO Lands Ltd.
9883iv	H1	Obj	<p>The representors' assessment of 5-year supply shows that its estimate of supply arising from the proposed allocations and existing commitments in the first five years is 5.13 years using the Council's figures (housing requirement of 867 dwellings per year) and 3.06 years using the representors' figure (using Government requirement of 1,070 dwellings per year). The scale of the deficit in land supply identified by the 5-year calculation is significant not only in terms of the need to identify more land but also in terms of the longevity of undersupply. By any reasonable assessment, there has been a significant shortfall in the provision of housing every year since 2007/08 – 10 years in all.</p>	O'Neill Planning Consultants representing SBO Lands Ltd.

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10097	H1	Obj	No housing trajectory has been provided to show annual delivery over the plan period; this method should be provided. There is also insufficient evidence on the assumptions used in relation to lead-in times and delivery rate assumptions, particularly for the Council's unimplemented permissions. There is a significant shortfall of sites in the 5-year supply when compared to the suggested revised OAHN. As a result, it is not considered that the plan is sound. It is considered that the plan will not be able to demonstrate a 5 year housing land supply and therefore the Green Belt will have to be reviewed early. Lack of safeguarded land will stifle housing growth.	DPP Planning on behalf of Shepherd Homes
12340	H1	Obj	867 dwellings to be built per year is not enough when the government have advised 1070 in order to fulfil York's housing demand. Three sites listed are not assured for development including ST1, which is unclear on availability due to cost of cleaning up the contaminated land and issues over affordable housing. ST35 not until 2023 and ST36 not until after 2031. Sites should be assured before they are included in the plan so as to avoid an unpredictable shortfall in dwelling completions.	
12560	H1	Obj	No housing trajectory has been provided to show annual delivery over the plan period; this method should be provided. There is also insufficient evidence on the assumptions used in relation to lead-in times and delivery rate assumptions, particularly for the Council's unimplemented permissions. There is a significant shortfall of sites in the 5-year supply when compared to the suggested revised OAHN. As a result, it is not considered that the plan is sound. It is considered that the plan will not be able to demonstrate a 5 year housing land supply and therefore the Green Belt will have to be reviewed early. Lack of safeguarded land will stifle housing growth.	DPP on behalf of landowner
13093	H1	Obj	The plan is reliant on higher densities provided by apartment living to make a significant contribution to overall supply even though the SHMA identifies that this is not the main type of dwelling required.	O'Neill Associates on behalf of Jorvik Homes

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13093	H1	Obj	The council are relying on a small number of strategic sites to deliver necessary housing but with long lead in times it is likely to have a shortfall in the short-term supply. This would mean that this policy would be immediately out of date after adoption of the plan.	O'Neill Associates on behalf of Jorvik Homes
13103	H1	Obj	Policy refers to phasing but lacks timescales. Only the MOD sites have delivery delay due to disposal dates.	Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees
13104	H1	Obj	Policy refers to phasing but lacks timescales. Only the MOD sites have delivery delay due to disposal dates.	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
13182	H1	Obj	The representor notes that within the supporting text for policy H1 that the Council is continuing to rely on a windfall allowance of 169 dwellings per annum. The representor's Client continues to object to this proposal as it will lead to uncertainty over delivery and will potentially lead to under delivery of housing.	Barton Wilmore on Behalf of Barratt and David Wilson Homes
13207	H1	Obj	Has particular concerns about the proposed population growth in "garden villages", where primary care facilities will need to be considered at the earliest stage of planning	NHS Vale of York Clinical Commissioning Group
13526	H1	Obj	Policy should be amended to include Land at Southfields Road and Princess Road, Strensall as housing allocations.	Lichfields on behalf of Wakefield Properties
13633	H1	Obj	The site at the end of Milestone Ave, Rufforth should be included as an allocation. See 13633/pre/alt/34/obj.	Barton Willmore on behalf of Equibase Ltd

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4	H1	Supp	Support the statement in Policy H1:Housing Allocations that 'an application on an allocated site in advance of its phasing will be approved if [...] the infrastructure requirements of the development can be satisfactorily addressed.'	Highways England
11	H1	Supp	Support the recognition and inclusion of windfall development within Policy H1 in addition to allocations as a means of achieving additional flexibility for housing delivery.	North Yorkshire County Council
386	H1	Supp	Strongly support the principle of phasing, however note that only 3 sites, in addition to Imphal Barracks are phased to start later than Year 1, leaving all the sites open to developer choice. Surely some of the major greenfield sites should be phased from Year 6 or later?	York Green Party
5167	H1	Supp	Support for ST32 Hungate and ST5 York Central. Major strategic sites can provide a significant source of housing as part of a wider mix of sites including smaller sites and increased density at such sites should be supported.	Lichfields on behalf of Hungate (York) Regeneration Ltd

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12655	H1	Supp	Support the policy in general and for sites to come forward in advance of the proposed trajectory. Could highlight more that previously developed land is the priority.	GVA on behalf of DIO Estates (MOD)

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<b>H2: Density of Residential Development</b>				
1705	H2	Comm	Suggest that an element of flexibility should be added to policy as there may be circumstances where 35 dph in rural areas and villages is out of keeping with the setting and scale of development in the rural area and a slightly lower density may be preferred.	Gladman Developments
5167	H2	Comm	On strategic sites the specific master planning agreements that provide density targets for that site may override the approach in this policy, which should be used as a general guide. Densities should be appropriate to the character of the surrounding area and considered on a site-by-site basis.	Lichfields on behalf of Hungate (York) Regeneration Ltd
5167	H2	Comm	Higher densities would be appropriate in principle on brownfield city centre sites such as Hungate in order to make efficient use of land and deliver much needed housing.	Lichfields on behalf of Hungate (York) Regeneration Ltd
12659	H2	Comm	In favour of general guideline densities. York Central represents a highly sustainable brownfield site and would support the flexibility within this policy and the possibility for delivering densities that reflect the nature of the site.	Arup on behalf of the York Central Partnership
13103	H2	Comm	Reference to net density is welcomed as this is often overlooked. Further clarification needed in supporting text.	Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees
13104	H2	Comm	Reference to net density is welcomed as this is often overlooked. Further clarification needed in supporting text.	Johnson Mowat on behalf of Redrow Homes and Linden Homes.



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13182	H2	Comm	The Council outlines proposed densities which it states new residential developments will be expected to achieve, which varies in different areas of the District. Whilst this approach is encouraged as it provides certainty to developers, it should remain flexible and used as a guide to define the densities of new developments. All residential developments are different and there can often be unique site characteristics which can reduce the developable area of a site, which in turn can affect the density of a development.	Barton Wilmore on Behalf of Barratt and David Wilson Homes
13633	H2	Comm	This policy is useful as a guide but it should remain flexible as every site/development is different.	Barton Willmore on behalf of Equibase Ltd
145	H2	Obj	The HBF considers that development densities of 100 dwellings per hectare within the city centre combined with 50 dwellings per hectares within the York urban area is optimistically high. Such development may be difficult to bring market as it would be likely to result in small garden areas, no garages and little parking. It is considered that lower density developments would be more marketable and the policy should be amended to allow for this flexibility,	Home Builders Federation
434	H2	Obj	Density guideline should not be viewed as a ceiling, but rather a guideline which can be exceeded, where appropriate and justified. New wording suggested to reflect this.	Rapeleys LLP on behalf of British Sugar PLC
536	H2	Obj	Although policy H2 sets out expected densities, for future housing developments in different parts of the City, no evidence is provided on how the capacity of proposed allocations have been calculated, taken into account site specific features for example, or through the application of a standard gross to net development area ratio, and it is not therefore possible to ascertain whether the yields are realistic.	Lichfields obo Keyland Developments

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540	H2	Obj	This policy / identified zones is too prescriptive. Density targets may be set aside in relation to strategic sites. On smaller sites, it is very likely that rigid adherence to density targets will mean that development could not properly respond to site and local constraints or meet a range of housing needs. This policy should be deleted.	Jennifer Hubbard Town Planning Consultant
1498	H2	Obj	The proposed densities are over ambitious and will not be achieved on sites throughout York. Do not think that 50dpa on a site of 1ha+ at a net developable of 95% can be achieved. More appropriate and conservative figures should be used. The gross:net ration should be 85% at most reducing to 60% on larger sites. 40dph on suburban sites is highly aspirational and unlikely to be achieved. The density's are aimed at smaller households and not suitable for family housing. There is a lack of evidence to support the assumptions.	Lichfields on behalf of Bellway Homes
1661	H2	Obj	The proposed densities are over ambitious and will not be achieved on average sites throughout York. Sufficient information has not been provided to back up the assumptions.	Lichfields on behalf of Linden Homes
9381i	H2	Obj	Object to the change of rural density between Preferred options and Pre Publication draft. Villages and rural areas density should be 30 dph. Increases in site density are not evidenced or justified. Site density assumptions should revert back to those used in the Publication draft version of the Plan (2014).	DPP Planning on behalf of Linden Homes
10097	H2	Obj	Object to the change of rural density between Preferred options and Pre Publication draft. Villages and rural areas density should be 30 dph. Increases in site density are not evidenced or justified. Site density assumptions should revert back to those used in the Publication draft version of the Plan (2014).	DPP Planning on behalf of Shepherd Homes
12560	H2	Obj	Object to the change of rural density between Preferred options and Pre Publication draft. Villages and rural areas density should be 30 dph. Increases in site density are not evidenced or justified. Site density assumptions should revert back to those used in the Publication draft version of the Plan (2014).	DPP on behalf of landowner

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13043i	H2	Obj	Residential densities are too high across the board. They discourage creating open space and providing decent sized gardens which are of paramount importance to combatting health problems.	
13182	H2	Obj	The representor suggests that a caveat is added to the policy to ensure that there is flexibility regarding the proposed housing density targets.	Barton Wilmore on Behalf of Barratt and David Wilson Homes
13213	H2	Obj	For consistency with the remainder of the plan the wording of the policy should be amended to <i>"100 units/ha within the city centre and York Central (ST5)"</i> .	GVA on behalf of the Homes and Communities Agency (HCA)
13539	H2	Obj	Consider that policy should include a degree of flexibility. The indicative scheme for the proposed alternative site at Kettlestring Lane (same ID ref) represents a density of 58 dph which should be acceptable for a site in an accessible and well-connected location.	Carter Jonas on behalf of Picton Capital Ltd
13552	H2	Obj	Against high density development and high density piece meal infill. This can damage the sense of space that is appreciated by most residents and can reduce amenities.	
238	H2	Supp	Welcome the requirement that density should be informed by the character of the local area and that, in Conservation areas, density should have regard to any relevant guidance set out in the appraisal of that area. This will help to ensure that new residential scheme respond sensitively to the distinctive character of the various parts of the City.	Historic England
386	H2	Supp	Support the principle of site specific flexibility in this policy and the principle that good design and density are intrinsically linked. The policy should say more specifically that good sustainable design can facilitate high density development which still delivers a good quality of life including green open space.	York Green Party

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386	H2	Supp	Further consideration should be given to a mix of densities in the garden villages and greenfield sites including elements of considerably higher density than the current guideline, as long as these are accompanied by more ambitious sustainable transport provision. The number of dwellings at the Elvington site in particular could be increased in this way and therefore provide greater critical mass to help fund sustainable transport solutions such as a tramline/light rail system.	York Green Party
1675i	H2	Supp	Welcome policy and clarification of net density. Further clarification in relation to elements that relate to gross and net density is required.	Johnson Mowat on behalf of Taylor Wimpey
12655	H2	Supp	The DIO supports this policy.	GVA on behalf of DIO Estates (MOD)
13213	H2	Supp	The intent of the policy is supported.	GVA on behalf of the Homes and Communities Agency (HCA)
13520	H2	Supp	Supports the housing density identified in this policy as a maximum of 35 dph in the Strensall with Towthorpe Parish.	Strensall with Towthorpe Neighbourhood Plan Steering Group

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
13637i	H2	Supp	As encouraged by NPPF paragraph 47, H2 is welcomed as it sets out the potential rate of density for housing sites in order to support the most efficient use of land.	CPRE - North Yorkshire

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
<b>H3: Balancing the Housing Market</b>				
71	H3	Comm	Policy should stipulate that outside the urban area, houses of more than two storeys high would be discouraged. Require more bungalows. Sheltered housing and assisted living should feature in areas where more than 500 houses are to be built. Should include parking for two cars within the curtilage of new houses.	Nether Poppleton Parish Council
71i	H3	Comm	Policy should stipulate that outside the urban area, houses of more than two storeys high would be discouraged. Require more bungalows. Sheltered housing and assisted living should feature in areas where more than 500 houses are to be built. Should include parking for two cars within the curtilage of new houses.	Poppleton Neighbourhood Plan Committee
78	H3	Comm	Policy should stipulate that outside the urban area, houses of more than two storeys high would be discouraged. Require more bungalows. Sheltered housing and assisted living should feature in areas where more than 500 houses are to be built. Should include parking for two cars within the curtilage of new houses.	Upper Poppleton Parish Council
80	H3	Comm	Need an increase in residential care for elderly and disabled in future developments.	Wigginton Parish Council
384	H3	Comm	Concern is raised about the range of social housing matching housing need for all ages and social units is provided. Very high housing site densities do not reflect the need for appropriate family friendly housing	York TUC
5167	H3	Comm	Policy supported in principle but needs to recognise the scope for flexibility on a site by site basis.	Lichfields on behalf of Hungate (York) Regeneration Ltd
5826i	H3	Comm	Welcomes the focus on 2 and 3 bed properties. Studio and 1 bed apartments should be discouraged in general housing stock as they are inflexible e.g. Preventing families from visiting, an important consideration as families have become more geographically dispersed across the country in recent decades.	
10018	H3	Comm	Build terraced, low cost, affordable houses. We have enough detached properties already.	

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
12527i	H3	Comm	Affordable housing for first time buyers / young families should be the priority as should smaller properties for the elderly looking to downsize. Less emphasis on buy to let and large detached properties.	
13003	H3	Comm	it is vital to ensure that housing provision keeps pace with economic demand, and housing tenure is prioritised to address economic need. Luxury, high value accommodation has the lowest demand in meeting the economic need of the city. Low cost housing, to buy or socially rent, is the greatest need.	Rachael Maskell MP
13103	H3	Comm	Policy needs to maintain a degree of flexibility give the SHMA considers only 'need' as opposed to 'demand'.	Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees
13104	H3	Comm	Policy needs to maintain a degree of flexibility give the SHMA considers only 'need' as opposed to 'demand'.	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
13391	H3	Comm	Questions whether the plan has enough proposed homes to meet York's needs and the inclusion of affordable homes and social housing.	
13542	H3	Comm	Plan proposes too few homes to cover York's need. The affordable housing should be actually affordable (under £250,00) and available for first time buyers. Social housing should form a significant element of the plan. Houses are needed now and sites which can be built on should be prioritised.	
13543	H3	Comm	Plan proposes too few homes to cover York's need. The affordable housing should be actually affordable (under £250,00) and available for first time buyers. Social housing should form a significant element of the plan. Houses are needed now and sites which can be built on should be prioritised.	

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
13628	H3	Comm	Policy should stipulate that outside the urban area, houses of more than two storeys high would be discouraged. Require more bungalows. Sheltered housing and assisted living should feature in areas where more than 500 houses are to be built. Should include parking for two cars within the curtilage of new houses.	Poppleton Neighbourhood Plan Committee
80	H3	Obj	The housing that is proposed lacks detail in the types and sizes. It is essential that any development will provide a range of housing from single to four bedrooms and provision for bungalows suitable for the elderly. There is also a significant requirement for social and affordable housing.	Wigginton Parish Council
145	H3	Obj	Acknowledge that this policy is based on evidence set out in the SHMA, however it should be noted that the SHMA will only ever identify current deficits and reflects a snap-shot in time. The HBF would like to ensure greater flexibility within this policy to acknowledge that the mix will vary both geographically and over the plan period. HBF would also like to ensure flexibility is built into this policy to reflect market demand and aspirations, not just housing need.	Home Builders Federation
431	H3	Obj	Whereas the Plan appears to be reliant on the higher densities provided by apartment living to make a significant contribution to the overall supply of housing, the evidence presented in the SHMA suggests that this is not where the main area of demand lies. The advice contained within paragraph 50 of the NPPF is that local planning authorities should: <ul style="list-style-type: none"> <li>• plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community [...]</li> <li>• identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.</li> </ul> In its current form, it is not clear how the Preferred Sites and their associated yields will address this requirement.	O'Neill Planning Consultants Representing Shepherd Homes
1498	H3	Obj	A geographical dimension should be incorporated into the policy to reflect specific mix at a local level, i.e. Larger family housing in and around existing settlements to reflect local area. Flats and smaller homes are better suited on sites within the main urban area of York where higher density development is likely to be more acceptable.	Lichfields on behalf of Bellway Homes



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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
1661	H3	Obj	The Council's aim to balance the housing market is generally supported. However, the 2016 SHMA notes that there is a geographic dimension and the specific mix of housing needed at a local level will be influenced in part by gaps in the existing housing offer locally.	Lichfields on behalf of Linden Homes
1675i	H3	Obj	Policy H3 fails to present a case for both need and demand.	Johnson Mowat on behalf of Taylor Wimpey
9883iv	H3	Obj	<p>Whereas the Plan appears to be reliant on the higher densities provided by apartment living to make a significant contribution to the overall supply of housing, the evidence presented in the SHMA suggests that this is not where the main area of demand lies. The advice contained within paragraph 50 of the NPPF is that local planning authorities should:</p> <ul style="list-style-type: none"> <li>• plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community [...]</li> <li>• identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.</li> </ul> <p>In its current form, it is not clear how the Preferred Sites and their associated yields will address this requirement.</p>	O'Neill Planning Consultants representing SBO Lands Ltd.
13003	H3	Obj	The housing crisis in York is not addressed by this Local Plan. Truly affordable housing to rent and buy is urgently needed. It is hard to purchase a property in York. This is resulting in people leaving the city and is detrimental to the local economy. It is vital that homes are developed at a price that is truly affordable to buy. The need of the city is to build family homes and the demand is predominantly for two and three bedroom homes, with a garden. If the Local Plan is about sustainable and good homes for the long term, it is vital that these are well planned for.	Rachael Maskell MP
13025	H3	Obj	House type designs should assimilate more flexibility and adaptability allowing designs to be easily 'grown' as the owners' circumstances, and finances dictate.	Integrated Built Environment Ltd

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
13182	H3	Obj	The representor's Client objects to family homes being defined as only 2 or 3 bed properties, as outlined within the policy. There is no justification for excluding 4 and 5 bed properties from the definition of family housing and it is important the such properties are delivered within the District as well as smaller sized properties, to ensure there is choice within the market for those families who are expanding and wishing to move to larger properties. As currently drafted the policy is not justified or effective and is unsound.	Barton Wilmore on Behalf of Barratt and David Wilson Homes
13600	H3	Obj	York provides very poor availability of family homes and is driving families away from the city or restricting children from playing outside. More provision needs to be made to ensure this type of house is being built and not just 1 and 2 bed flats that fill the housing allocation quicker and using less land.	
13619	H3	Obj	Definition of affordable housing is inadequate as this will still be unaffordable to many. The complete absence of social housing is unacceptable. Affordability crisis ultimately does damage to the city as it breaks up communities, people who work here such as teachers and nurses cannot afford to live here. Angered by councillors decision to ignore planning consultants advice as it was a waste of public money.	
13633	H3	Obj	Understands the needs of the authority in terms of securing a mixture of house types and sizes but object to family homes being defined as only 2-3 bed properties.	Barton Willmore on behalf of Equibase Ltd
1498	H3	Supp	Supportive of meeting housing mix set out in the SHMA.	Lichfields on behalf of Bellway Homes
1675i	H3	Supp	Support policy but consider that it needs to maintain an element of flexibility . Would also support inserting a size threshold against which evidence of demand and need is required.	Johnson Mowat on behalf of Taylor Wimpey
5167	H3	Supp	Policy supported in principle.	Lichfields on behalf of Hungate (York) Regeneration Ltd

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
12659	H3	Supp	Supportive of the need to balance the housing market by including a mix of types of housing. Supportive of the final mix of dwelling types and sizes being subject to negotiation.	Arup on behalf of the York Central Partnership
13182	H3	Supp	The representor's Client welcomes the flexibility that is included within the Plan, which states that the final mix of dwelling types and sizes would be subject to negotiation.	Barton Wilmore on Behalf of Barratt and David Wilson Homes
13213	H3	Supp	The policy approach is welcomed	GVA on behalf of the Homes and Communities Agency (HCA)

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
13637i	H3	Supp	This policy aims to ensure there is a balanced housing mix across development and is in accordance with the SHMA.	CPRE - North Yorkshire

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
<b>H4: Promoting Self and Custom House Building</b>				
145	H4	Comm	In principle BHF is supportive of self-build and custom build however the council's approach is restrictive rather than permissive by requiring the inclusion of such housing on strategic sites of 5ha and above. This policy approach only changes the house building delivery mechanism from one form of house building company to another without any consequential additional contribution to boosting housing supply. HBF would also be interested to see evidence to support the idea that those wanting to self-build would actually consider building within a larger housing development.	Home Builders Federation
456	H4	Comm	Proposals for self build will only work if the council establishes an appropriate support framework to assist with technical/design/legal/financial issues and simplifies planning requirements.	
540	H4	Comm	What does "Plots should be made available at competitive rates" mean? The policy is unclear in requiring self and custom build plots to be made available and marketed for "at least 12 months" - 12 months, 14 months, 2 years etc? What point will a period of marketing be sufficient? The policy needs more clarity.	Jennifer Hubbard Town Planning Consultant
1705	H4	Comm	Difficult to assess how self-build plots on allocated sites will be implemented given issues around working hours, site access, health and safety etc that are associated with large scale development sites.	Gladman Developments
5167	H4	Comm	Support the principle of this policy for planning for a range of housing types to meet identified need including demand for self build plots. Agree that viability and site circumstances should be taken into account when determining the nature and scale of provision. However it is important to recognise that onsite provision of plots for self and custom builders would not be appropriate on some sites such as apartment block developments in the city centre for example the Hungate development and the policy needs to be amended to contain sufficient flexibility to reflect this.	Lichfields on behalf of Hungate (York) Regeneration Ltd

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
12659	H4	Comm	Generally supportive of the principles of policy H4 but greater emphasis is needed to reflect that this policy might not realistically be deliverable in urban areas and on brownfield sites which are challenging to bring forward. Concern over the part of the policy which states that on strategic sites developers will be required to supply at least 5% of dwelling plots for sale to self builders - concern how this would be practically achieved on brown field sites. Additional detail required in the policy. The council also needs to consider the implications of requesting both Policy H4 and Policy H5 in tandem on a brownfield urban site.	Arup on behalf of the York Central Partnership
13213	H4	Comm	Policy H4 requires 5% of dwelling plots on strategic sites to be available for self and custom build housing. The HCA is concerned that this would not be feasible on brownfield land where remediation and infrastructure costs can be prohibitive.	GVA on behalf of the Homes and Communities Agency (HCA)
13551	H4	Comm	The Local Plan earmarks 5% for self and community build. This should be raised to 10%.	York Central Action
9	H4	Obj	Selby District Council query the viability of such a policy and await further evidence before providing any additional comments on how this may impact on Selby District.	Selby District Council
434	H4	Obj	No provision of self and custom build is made within the outline application of ST1 . It should be made clear that this does not relate to ST1. New wording suggested to reflect this.	Rapleys LLP on behalf of British Sugar PLC
1675i	H4	Obj	Object to the need to insert custom build housing on larger allocations. Those traditionally seeking to build their own home do not do so on a housing estate. Sites of up to 10 dwellings with affordable housing commuted off site are the best vehicle for this approach.	Johnson Mowat on behalf of Taylor Wimpey
13025	H4	Obj	Despite changes to legislation encouraging uptake of self and custom build housing in the UK, the Council appears to be operating under outdated practices regarding its self build and custom build housing policy. Very little done to advertise self and custom build register.	Integrated Built Environment Ltd

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ID	Policy	Obj/Supp/Comm	Summary	Respondent (name of individuals removed)
13103	H4	Obj	Object to the need to insert Custom Build Housing on larger allocations.	Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees
13104	H4	Obj	Object to the need to insert Custom Build Housing on larger allocations.	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
13600	H4	Obj	The policy does not mention that plots should be serviced - this is vital as individual plot buyers will face major difficulties in gaining self build mortgages if these are not provided. The government guidance on this states that plots should be provided fully serviced.	
386	H4	Supp	Supports policy.	York Green Party
5167	H4	Supp	Support the principle of this policy for planning for a range of housing types to meet identified need including demand for self build plots. Agree that viability and site circumstances should be taken into account when determining the nature and scale of provision.	Lichfields on behalf of Hungate (York) Regeneration Ltd

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
12659	H4	Supp	Generally supportive of the principles of policy H4.	Arup on behalf of the York Central Partnership



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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
<b>H5: Gypsies and Travellers</b>				
9	H5	Comm	Request clarification on whether large non-residential sites will be expected to provide for Gypsies and Travellers, as this is currently not clear from the policy.	Selby District Council
59	H5	Comm	Support the policy but surprised to see that there is no mention that gypsy and traveller sites are inappropriate development in the green belt.	Dunnington Parish Council
262	H5	Comm	Part c) Planning Applications. Support the proposed criteria for determining planning applications. Reflecting the approach the YTT advocate to sites, and the likelihood of change to the 2015 definition of G&T for planning purposes, propose a change to the last sentence of H5 on the lines: 'Any permission granted for a G&T development will be subject to a condition limiting occupation to G&T as defined in Planning Policy for Traveller Sites, and for those who do not meet that definition, together with any future changes in that definition'. Meeting Future Need. Welcomes the fact that CYC has acknowledged that appropriate accommodation is needed for both G&Ts who meet definition, and those who do not. CYC should have in place a supply of sites for both groups as they have the same needs. Plan needs to acknowledge that York is exceptional in the extremely high proportion of existing provision on public sites, and if the City is to follow the national pattern, more of the provision will be on Gypsy owned sites on the urban fringe and countryside - these sites should be removed from the Green Belt. It is not clear who would be responsible for delivering/negotiating the sites/land/commuted sum in relation to strategic sites. Need to look specifically at what the G&T community want in term of the location/size/type of sites.	York Travellers Trust
1654	H5	Comm	Welcome the fact that the Plan recognises the needs of those Gypsies who do not meet the revised definition.	The National Federation of Gypsy Liaison Groups
5167	H5	Comm	The policy requires strategic site allocations to make provision of pitches onsite, on alternative land or to provide a commuted sum payment towards the development of pitches elsewhere. However no detail is given on how the commuted sum would be calculated. Further clarity is needed and will provide more comments when this detail is available.	Lichfields on behalf of Hungate (York) Regeneration Ltd

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ID	Policy	Obj/Supp/Comm	Summary	Respondent (name of individuals removed)
12245	H5	Comm	While the policy provides that sites will be approved where no significant detrimental affect on the amenity of occupiers of adjoining or nearby land it does not give any provision of space or consideration for any associated livestock that the community may have. We would welcome details of how CYC would treat such livestock within the plan to avoid any adverse issues.	NFU
13213	H5	Comm	Whilst the HCA recognises that a range of sites must be allocated in the plan for the needs of gypsies and travellers, the approach taken in Policy H5 requires careful thought. Firstly, the policy fails to satisfy the locational needs of this community. Further assessment, building on that already undertaken as part of the Council's Gypsy and Traveller Accommodation Assessment Update (2017), is required to better understand the types of sites that will meet this need. Secondly, the policy could have a significant impact on the deliverability of development on brownfield land which will need remediating and infrastructure provision. Further work to understand the implications of this policy is required.	GVA on behalf of the Homes and Communities Agency (HCA)
62	H5	Obj	Concerned that Policy H5 does not reflect national policy and also does not include sufficient safeguards to protect existing communities in York from potentially harmful development. Part b) of the policy should be deleted. There is no provision in national policy that links general housing proposals for the settled community with pitches for gypsy and traveller caravans nor is there any local factor that could justify such a link. National policy makes clear that these are completely separate forms of development. If CoYC considers that Part b) should be retained (for whatever reason), FPC specifically objects to its second bullet point which allows landowners/developers to accommodate the required number of pitches on other land in their control (potentially in the Green Belt). This bullet point would enable landowners/developers to offload the associated visual, environmental and other disbenefits of such provision onto existing communities potentially distant from the development whilst increasing land value for themselves. Part c) should be amended. In particular, : 1)In line with national policy (2015) criterion i) should be altered to make clear that traveller/gypsy developments are inappropriate anywhere within the Green Belt and will only be	Fulford Parish Council

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
145	H5	Obj	Concerned by the need for strategic allocations to meet the needs of those Gypsies and Travellers households that do not meet the planning definition set out in Planning Policy for Traveller Sites. Further clarity is needed in relation to why provision is needed for those households no longer meeting the definition; whether a pitch on a strategic allocation is an appropriate location for these households particularly at the numbers proposed; what will happen to these pitches if no gypsy or traveller wishes to utilise them; and the management of these pitches.	Home Builders Federation
434	H5	Obj	No provision for gypsies and travellers is made within the outline application of ST1. It should be made clear that this does not relate to ST1. New wording suggested to reflect this.	Rapeleys LLP on behalf of British Sugar PLC
866	H5	Obj	Object due to provision of gypsy and traveller pitches on strategic allocations over 5ha creating issues such as being located on sites intended for B2 purposes. Asks policy to be amended to make clear it only relates to strategic allocations. Will also impact marketability of allocations which are prime development sites for housing need and make them unavailable and create integration issues with local community. Suggest larger allocations capable of delivering 1500 dwellings more suitable.	Northminster Business Park
1674	H5	Obj	Object to Policy G5 on the basis that the provision of gypsy and traveller pitches on strategic allocations over 5 ha will create a number of issues, which consequently mean we have serious concerns in respect of this policy. First concern is that criterion (b) does not make clear whether the requirement relates to all strategic allocations, or just those that include an element of residential development. Cannot imagine that the policy is expected to apply, for example, to ST5, ST19, ST26. To require Gypsy and Traveller pitches on sites intended for B2 manufacturing processes would create a conflict between land uses that would be wholly undesirable. Could the Policy please be amended to make clear it only relates to strategic allocations, which include residential development?	Directions Planning Consultancy Ltd on behalf of William Birch & Sons

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
1675i	H5	Obj	We object to Policy H5 as drafted. Gypsy and Traveller pitches are not suitable for large strategic housing sites, they have particular needs that traditionally require their own site. While there is no objection to the second part of the policy that seeks a contribution, this appears to lack any justification. Clarity is required on the level of contribution sought. Excessive requests may upon on the delivery of affordable housing	Johnson Mowat on behalf of Taylor Wimpey
1705	H5	Obj	Policy requires applications on strategic sites to provide gypsy and traveller accommodation. Where this is required on allocated sites, this can cause significant issues with the deliverability of the sites in question.	Gladman Developments
6046	H5	Obj	Object to policy H5 on the basis that the provision of gypsy and traveller pitches on strategic allocations over 5ha will create a number of issues, which consequently mean there are serious concerns with this policy. The first concern is that criterion (b) does not make it clear whether the requirement relates to all strategic allocations or just those that include an element residential development - for example, does it apply to ST5, ST19 & ST26? Could the policy be amended to make it clear it only relates to strategic allocations which include an element of residential development? The policy also has a significant effect on the marketability of strategic allocations, which represent prime development sites necessary to contribute to York's significant housing need. The policy could render the strategic allocations unviable with the potential for the sites to become unavailable. It is suggested that the larger, more strategic allocations capable of delivering over 1500 dwellings would be more suited to accommodating gypsy pitches if the Council insists on its current approach, as these sites provide a scale of development more likely to support the needs of the gypsy and traveller community.	Directions Planning Consultancy

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
12659	H5	Obj	Profound concern as to how this policy has been formulated. The overall robustness of the policy approach is questionable for the following reasons: 1. Locational demand: gypsies and travellers prefer to reside in family groups in areas they have an association with and dispersed across different sites, 2. Applicability of this policy in a brownfield land urban context, this policy would reduce the developable area of York Central. Concern how the commuted sum payments would work in relation to York Central. Additional evidence required on these issues. The council also needs to consider the implications of requesting both Policy H5 and Policy H4 in tandem on a brownfield urban site.	Arup on behalf of the York Central Partnership
13103	H5	Obj	Gypsy and Traveller pitches are not suitable for large strategic housing sites. No objection to second part of policy that seeks contribution but it appears to lack justification.	Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees
13104	H5	Obj	Gypsy and Traveller pitches are not suitable for large strategic housing sites. No objection to second part of policy that seeks contribution but it appears to lack justification.	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
74	H5	Supp	Support comments in para c) that states that applications for traveller sites should not conflict with the objective of conserving and enhancing York's historic and natural environment.	Rufforth with Knapton Parish Council
238	H5	Supp	Support the requirement that sites for gypsies and travellers will only be permitted where they do not conflict with the objective of conserving and enhancing the historic environment including the city's character and setting. This requirement will help to ensure that any such developments safeguard the special character and setting of the City of York and its historic environment.	Historic England

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
386	H5	Supp	Supports policy.	York Green Party

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
<b>H6: Travelling Showpeople</b>				
62	H6	Obj	<p>Wants part C of this policy rewording in the same way as H5. (Comments on H5 were as follows: Concerned that Policy H5 does not reflect national policy and also does not include sufficient safeguards to protect existing communities in York from potentially harmful development. Part b) of the policy should be deleted. There is no provision in national policy that links general housing proposals for the settled community with pitches for gypsy and traveller caravans nor is there any local factor that could justify such a link. National policy makes clear that these are completely separate forms of development. If CoYC considers that Part b) should be retained (for whatever reason), FPC specifically objects to its second bullet point which allows landowners/developers to accommodate the required number of pitches on other land in their control (potentially in the Green Belt). This bullet point would enable landowners/developers to offload the associated visual, environmental and other disbenefits of such provision onto existing communities potentially distant from the development whilst increasing land value for themselves. Part c) should be amended. In particular, in line with national policy (2015) criterion i) should be altered to make clear that traveller/gypsy developments are inappropriate anywhere within the Green Belt and will only be allowed in very special circumstances. The present wording is too ambiguous on this point and is contrary to national policy. Criterion iv) should be strengthened so that it states: Ensure that the development does not harm the amenity of nearby existing residents, including by loss of outlook or the creation of unacceptable traffic patterns, noise, disturbance, pollution or air quality. A further criterion should be added requiring reasonable levels of amenity for future occupants. Criteria ix) and x) should be moved from the second paragraph of Part c) and placed in the first paragraph as these are matters primarily concerned with the principle of development rather than layout.)</p>	Fulford Parish Council

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
238	H6	Supp	Support the requirement that sites for gypsies and travellers will only be permitted where they do not conflict with the objective of conserving and enhancing the historic environment including the city's character and setting. This requirement will help to ensure that any such developments safeguard the special character and setting of the City of York and its historic environment.	Historic England
386	H6	Supp	Supports policy.	York Green Party
13557	H6	Supp	Support for Policy H6 and the travelling Showpeople that are living on The Stables site in Elvington. The family have integrated well into the community. The site is also well screened and unobtrusive. The site is proportionate to the needs of the family.	



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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
13558	H6	Supp	Support for Policy H6 and the travelling Showpeople that are living on The Stables site in Elvington. The family have integrated well into the community. The site is also well screened and unobtrusive. The site is proportionate to the needs of the family.	

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
<b>H7: Student Housing</b>				
46	H7	Comm	In the section on Fulford and Heslington Ward the site 834 is shown as a narrow strip of Outdoor Sports Facility of 2.71 Ha. It should be shown as wider strip extending up to the boundary of Fulford Golf Course and will be about 5.0 Ha in total. If some of these sports fields are not up to standard then this extra space could be classified as natural and semi-natural.	Heslington Village Trust
71	H7	Comm	No mention of the increase in student housing at Askham Bryan College yet the college boast increasing numbers significantly in its business plan.	Nether Poppleton Parish Council
71i	H7	Comm	No mention of the increase in student housing at Askham Bryan College yet the college boast increasing numbers significantly in its business plan.	Poppleton Neighbourhood Plan Committee
78	H7	Comm	No mention of the increase in student housing at Askham Bryan College yet the college boast increasing numbers significantly in its business plan.	Upper Poppleton Parish Council
386	H7	Comm	Amend first para. Insert new second sentence 'Whenever possible the first recourse for additional purpose built student accommodation should be on campus.' 'In assessing need, consideration will be given to the capacity of independent providers of bespoke student housing in the city and whether it is economically prudent to provide additional student accommodation.' What does this mean? Delete 'To meet any projected shortfall, provision by the University of York can be made on either campus. Provision by York St. John University is expected to be off campus but in locations convenient to the main campus.' – add point iv. As follows 'where the cumulative impact of purpose built student accommodation in an area can be shown to be un-balancing the local community.	York Green Party
5826ii	H7	Comm	York University should be encouraged to provide more new accommodation on campus as part of any expansion / development plans. There should be a requirement for the university to provide a minimum % of their full time student base on campus, set at a level above the status quo (ref policies ED1 and ED2).	

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
10919	H7	Comm	In the section on Fulford and Heslington Ward the site 834 is shown as a narrow strip of Outdoor Sports Facility of 2.71 Ha. It should be shown as wider strip extending up to the boundary of Fulford Golf Course and will be about 5.0 Ha in total. If some of these sports fields are not up to standard then this extra space could be classified as natural and semi-natural. Also, there are allotments to the south of Low Lane that have been omitted.	
13103	H7	Comm	Plan must make it clear that student housing sits outside the OAN and housing supply.	Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees
13104	H7	Comm	Plan must make it clear that student housing sits outside the OAN and housing supply.	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
13536	H7	Comm	Concerned that inner York has substantial private, expensive accommodation for students - that space could be used for private residence in a better mix of use.	
13628	H7	Comm	No mention of the increase in student housing at Askham Bryan College yet the college boast increasing numbers significantly in its business plan.	Poppleton Neighbourhood Plan Committee

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
62	H7	Obj	Suggest either that the first part of Policy H7 is deleted as it simply duplicates other policies (ED1, ED2, ED3 and ED4) or it is replaced with the following: The University of York and York St John University must meet the need for any additional student housing which arises because of their future expansion of student numbers. In assessing need, account can be taken of firm proposals by independent providers for bespoke student housing in the City. To meet any projected shortfall, provision by the University of York can be made on either campus.	Fulford Parish Council
1675i	H7	Obj	The plan needs to make clear that student housing sites outside of the OAN and housing supply.	Johnson Mowat on behalf of Taylor Wimpey
13003	H7	Obj	The Plan should state how many student accommodation units are being planned for site SH1	Rachael Maskell MP

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
38	H7	Supp	Supports policy.	York St John

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
<b>H8: Houses in Multiple Occupation</b>				
62	H8	Obj	<p>FPC considers that the thresholds for restrictions on new HMOs should be reduced from 20% to 10% for neighbourhood areas and from 10% to 5% for lengths of street. FPC considers the policy should contain a restriction on extensions to existing and proposed HMOs. Such extensions are often unsightly and out-of-scale with the original house, giving an institutional air to the property. The following is suggested: Extensions to existing and proposed HMOs will only be permitted where it will improve living conditions for residents (such as larger bathrooms and kitchens) and not to provide additional living units.</p>	Fulford Parish Council

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
386	H8	Supp	Supports policy.	York Green Party

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
<b>H9: Older Persons Specialist Housing</b>				
62	H9	Comm	Further criteria should be added to ensure that any proposals do not result in loss of amenity to local residents for reasons such as overlooking, traffic generation, noise, effect upon residential character and visual impact; and the scale, design, character and impact of the proposal is acceptable in the location and sympathetic to its surroundings.	Fulford Parish Council
71	H9	Comm	Policy is good at suggesting the basis for measurement of housing need for the elderly, this has been overlooked when permitting new old people homes - in general these are situated in or close to business/industrial parks which is inappropriate.	Nether Poppleton Parish Council
71i	H9	Comm	Policy is good at suggesting the basis for measurement of housing need for the elderly, this has been overlooked when permitting new old people homes - in general these are situated in or close to business/industrial parks which is inappropriate.	Poppleton Neighbourhood Plan Committee
78	H9	Comm	Policy is good at suggesting the basis for measurement of housing need for the elderly, this has been overlooked when permitting new old people homes - in general these are situated in or close to business/industrial parks which is inappropriate.	Upper Poppleton Parish Council
145	H9	Comm	It is not clear from the wording of Policy H9 whether the proposal for strategic sites (over 5ha) to incorporate appropriate provision of accommodation types for older persons refers to C2 or C3 provision. Further clarity on this policy is required.	Home Builders Federation
540	H9	Comm	This policy appears to consider 2 types of housing: 1) General housing suitable for older people (bungalows?): 2) specialist housing for older people with particular social, physical or healthcare needs. Is this the case or is it just for older people with specific 'extra' needs? Needs clarifying.	Jennifer Hubbard Town Planning Consultant



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ID	Policy	Obj/Supp/Comm	Summary	Respondent (name of individuals removed)
1675i	H9	Comm	Policy H9 requires further clarification on what is required in terms of numbers and types. While house builders can provide elderly persons housing under C3, the provision of extra care housing as a C2 class is more complex. The suggestion is that reference to Strategic Sites providing homes for the elderly needs to reference C3 uses only and the supporting text at para 5.58 needs to inform that C2 development will not count towards the housing supply in the OAN.	Johnson Mowat on behalf of Taylor Wimpey
12659	H9	Comm	Supportive of the approach in this policy. Further clarity on how the delivery of both older persons specialist housing and affordable housing delivery will be considered on a site-specific basis to ensure that the site remains sufficiently viable and deliverable.	Arup on behalf of the York Central Partnership
13103	H9	Comm	Policy requires further clarification on what is required in terms of numbers and types (C3 or C2?)	Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees
13104	H9	Comm	Policy requires further clarification on what is required in terms of numbers and types (C3 or C2?)	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
13454	H9	Comm	Policy H9. There should be a provision for older local people.	
13628	H9	Comm	Policy is good at suggesting the basis for measurement of housing need for the elderly, this has been overlooked when permitting new old people homes - in general these are situated in or close to business/industrial parks which is inappropriate.	Poppleton Neighbourhood Plan Committee
434	H9	Obj	It has been agreed that predominantly family housing will be provided on ST1. These unit types can provide suitable accommodation for older people. It is not appropriate that for the British Sugar site specific older persons specialist housing should be provided. It should be made clear that this does not relate to ST1. New wording suggested to reflect this.	Rapleys LLP on behalf of British Sugar PLC

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ID	Policy	Obj/Supp/Comm	Summary	Respondent (name of individuals removed)
13182	H9	Obj	The representor advises that the policy is caveated to state that it is subject to their being a demonstrated need for such accommodation in the relevant area and subject to viability.	Barton Wilmore on Behalf of Barratt and David Wilson Homes
386	H9	Supp	Supports policy.	York Green Party
1705	H9	Supp	Policy supported as it seeks to provide extra-care accommodation specifically designed to meet the needs of older people.	Gladman Developments
5167	H9	Supp	Support for this policy. This must be applied flexibly, based on particular site characteristics.	Lichfields on behalf of Hungate (York) Regeneration Ltd
12659	H9	Supp	Supportive of the approach in this policy.	Arup on behalf of the York Central Partnership
13182	H9	Supp	The representor welcomes the Council's intention to deliver specialist accommodation for older persons.	Barton Wilmore on Behalf of Barratt and David Wilson Homes
13213	H9	Supp	The policy is supported, as is the inclusion of such sites on major strategic allocations including York Central [ST5], albeit further clarity on how older persons housing and affordable housing will be considered on a site specific basis to ensure sites remain viable would be helpful.	GVA on behalf of the Homes and Communities Agency (HCA)

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
13520	H9	Supp	Supports the policy and when the examination of existing buildings on the QE barracks site is completed, there may be an adaptable building which could used for Older Persons Specialist Housing.	Strensall with Towthorpe Neighbourhood Plan Steering Group

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
<b>H10: Affordable Housing</b>				
74	H10	Comm	Development in the parish is not suitable for rented affordable housing due to the lack of services and infrequent public transport.	Rufforth with Knapton Parish Council
540	H10	Comm	What does the introduction to the policy and criterion 'i' mean? Reserve further comment on the Plan's approach on affordable housing inc thresholds and targets, until the next stage of the process as it appears that there may be new policy from Government affecting these issues in the meantime.	Jennifer Hubbard Town Planning Consultant
2412	H10	Comm	How will the plan provide social and affordable housing to the current and prospective residents of the city? How will rental property market be regulated - many York residents have no or very little chance of becoming homes owners.	
12284	H10	Comm	The Local Plan needs to provide more social housing and cheap housing. Every development needs to have a proportion of social housing mixed amongst the private homes.	
13267	H10	Comm	Affordable' housing should be actually affordable for first time buyers on lower salaries	
13334	H10	Comm	As a York resident with a family wishes to stresses the need for more affordable housing in York.	
13358	H10	Comm	Affordable housing must be the priority - for occupancy by the owner, not buy-to-let.	
13435	H10	Comm	We work in York and rent a property, but cannot afford to buy. The upper limit for first time buyers is approx £150,.000, realistically. If we cannot afford to buy, we will be forced to live outside York and commute in.	
13437	H10	Comm	It is essential that there is more social housing in the City.	
13454	H10	Comm	There should be more affordable and social housing for local people.	
13475	H10	Comm	Consider the provision of really affordable housing especially for first time starter homes. Look at 'low cost' sites. Reflect the need for more building land around York rather than in York.	
13510	H10	Comm	It is essential that the proposals contain a sufficient amount of affordable housing including social housing	

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ID	Policy	Obj/Supp/Comm	Summary	Respondent (name of individuals removed)
13531	H10	Comm	Very concerned that the Plan does not include enough affordable housing as it is a major issue for York. Aware that an expensive report was commissioned, highlighting the issue, but this was ignored. This was a waste of council tax payers money.	
13549	H10	Comm	York needs more genuinely affordable housing, developers should not be able to pay their way out of providing this. CYC should be encouraging Housing Associations to set up rent-to-buy schemes. Need to provide the right type of housing, bungalows suitable for the elderly and 1 or 2 bedroom semi-detached housing, not 4 or 5 bedroom houses that are the most profitable. Young people are the future life blood of the city and are being priced out.	
13609	H10	Comm	Affordable housing is a huge concern for people living in York and many people are leaving the area as they cannot afford to live or run their businesses here. Would recommend that in line with national targets the York Local Plan should set quotas for affordable housing relating to residential developments so that the developments benefit the existing local community and not just new incomers. By increasing the quota York will continue to be a thriving community	
145	H10	Obj	Acknowledges the need to improve affordability across the housing market however it is noted that this aspiration is not included within the overall housing requirement. The delivery of affordable housing must be balanced against economic viability considerations. The policy at present makes no reference to the Government's intention to deliver starter homes as part of the affordable homes mix.	Home Builders Federation
192	H10	Obj	Policy H10. Concern over affordable housing in rural areas when the policy indicates that in rural areas, developments between 2 and 14 dwellings are to make an off-site contribution. Concern that the only other policy is exceptional sites in the Green Belt. Identifying that land will be difficult for rural villages and may impact on the Green Belt. If land can be found it will only be for affordable housing and not a mix of housing.	

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
384	H10	Obj	The current plan fails to provide enough housing, particularly affordable/social housing. And falls massively short of the Governments evaluation of 1070 homes per year and ignores CYCs own officers and consultants advice for a minimum 10% uplift. Current house prices are already unaffordable for a large section of the population. The Plan should be amended to deliver at least the Government's estimate of 1070 pa and a higher proportion should be delivered as affordable/social housing.	York TUC
386	H10	Obj	The affordable housing target should apply to sites under 15 dwellings (and 4 dwellings or more) via either onsite provision or off-site contribution in both rural and urban sites. Add point vi) with regard to larger development sites seek to work pro-actively with the Council or another registered social landlord to deliver additional direct funded affordable housing.	York Green Party
434	H10	Obj	Criterion v. support for the concept of pepper-potting affordable development throughout the development. Feel that the current proposal of no more than two affordable dwellings placed next to one another is overly prescriptive. The policy requirement in H10 does not relate to ST1, this should be made clear in the policy.	Rapeleys LLP on behalf of British Sugar PLC

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
4355	H10	Obj	<p>Objects to the approach to calculating the commuted sum for off-site affordable housing provision on non-rural sites. The calculation for rural sites makes it clear that the calculation will be based on the 'Average York Property Price'. However, Para 5.70 states that: "Any other off site provision or commuted payment in lieu of on-site provision for affordable housing will only be acceptable if it is robustly justified and that the commuted payment will be calculated as the difference between the transfer price and the market value of the specific home(s) on that site." No explanation or justification is given for this difference and we can find no justification other than an apparent desire to make off-site provision in what will be very limited circumstance financially punitive. If an affordable unit cannot be provided on site, for whatever reason considered justifiable, then it will need to be provided off-site. The cost of providing that affordable unit off-site, generally elsewhere in the city, should reflect the average costs of such provision not the notional cost of its provision on one particular site. If it doesn't then the developer is over-paying for the affordable unit, and in effect potentially being required to deliver more than the required target percentage of affordable unites detailed in the policy. The approach proposed in relation to rural sites whereby one takes the average property price across the city is pragmatic, easy to understand, and reduces the need for detailed site by site analysis of prices. HBD would request therefore that the plan is amended to confirm that this approach is adopted by the Council in relation to all such calculations across the city irrespective of their rural or urban location.</p>	ELG Planning on behalf of Henry Boot Developments Ltd
5599	H10	Obj	Affordable housing in the plan is unlikely to meet acute need for social rented housing in the city.	

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ID	Policy	Obj/Supp/Comm	Summary	Respondent (name of individuals removed)
12340	H10	Obj	There are two aspects to this policy that seriously undermine the likelihood of enough affordable housing being built. 1. the policy has no clear commitment to building social and housing association housing. This needs to be far stronger and 2. the policy gives developers an option to avoid building any affordable housing. Developers should not have the option to prove unviable or opt out of building affordable housing. Local people are being priced out of the market.	
12640i	H10	Obj	Questions guarantees that affordable housing numbers will be met as developers will not want to lose profits and they are much needed.	
13103	H10	Obj	Overlooks Government's intention to deliver 'Starter Homes' as part of the Affordable Housing mix. Should consider inserting an off-site contribution for self build custom sites. Whilst the 30% affordable housing target is not objected to, there are many policies in the plan which seek developer contributions. The cumulative effect could be significant for viability of developments.	Johnson Mowat on behalf of Redrow Homes, K Hudson and G M Ward Trustees
13104	H10	Obj	Overlooks Government's intention to deliver 'Starter Homes' as part of the Affordable Housing mix. Should consider inserting an off-site contribution for self build custom sites. Whilst the 30% affordable housing target is not objected to, there are many policies in the plan which seek developer contributions. The cumulative effect could be significant for viability of developments.	Johnson Mowat on behalf of Redrow Homes and Linden Homes.
13213	H10	Obj	Point (iv) should be amended so that the SHMA is used as guidance only and that the resultant mix of dwelling types and a wider range of tenure should be considered in the context of Government guidance, the site's characteristics and ability to deliver the optimum level of affordable housing, recognising all forms of delivery and ownership options. Furthermore we would wish to see flexibility in the pepper potting approach to allow practical maintenance of homes.	GVA on behalf of the Homes and Communities Agency (HCA)
13362	H10	Obj	York needs a high percentage of affordable or social housing in the plan, this is the area of greatest need.	
13379	H10	Obj	Wants a higher percentage of affordable housing on all sites, 50% should be the target to meet York's need.	



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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
13405	H10	Obj	The Council's Plan doesn't meet York's housing need. Govt figures suggest that York will need to build at least 1070 homes a year to meet growing demand. However, the Tories and Lib Dems refuse to allocate enough houses and don't plan to build any social housing at all. Not enough housing means higher house prices and rents. The Council Plan doesn't include enough affordable housing. The Tory / Lib Dem Plan will mean fewer affordable homes for local people. For every 5 homes that York needs, the Council only plans to build 4. The Plan has 3300 fewer homes than needed.	
13410	H10	Obj	Concern over where people on low paid jobs will live. No social housing is being proposed. Affordable housing proposed is inadequate in number and even this if not reserved for local people will not meet local needs.	
13418	H10	Obj	No guarantees about affordable housing and no provision for social housing.	
13471	H10	Obj	Not enough affordable housing, particular lack of social housing.	
13478	H10	Obj	One of York's biggest challenges is lack of affordable housing. The policies for developers appear useless, unless the government is willing to fund truly affordable social housing as part of a development, then these policies seem to be unworkable and meaningless.	
13507	H10	Obj	Distressed by the fact that York has become unaffordable for many people, strongly wishes the council builds 1,070 new houses a year as not doing so will continue changing the character of the city so that only the rich can afford to live here. Disappointed to note that there are no plans for social housing. Wishes that the majority of new homes are council homes, housing association homes or genuinely affordable homes.	
13512	H10	Obj	Baffled as to why there is no provision of social housing and virtually no affordable housing. Feels the plan favours developers needs over the City's and residents'.	

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
13578	H10	Obj	Main concern is the lack of affordable housing in York, current plan provision is inadequate. Also concerned by the complete absence of social housing, the council is making it impossible for people on modest incomes to live in the city of York. Council budget should be spent / increased to address this.	
13615	H10	Obj	There is not enough affordable housing included within the Plan. House prices are too high for affordable housing and not enough houses will be built to meet demand for the 1070 new homes the Government figures suggest the city needs - there is no intention to build any social housing either.	
13639	H10	Obj	Definition of affordable is not realistic. Values quoted of £241,000 or above are not attainable for many people in York. There is no serious provision of social housing, a major flaw in plans for the city.	
77	H10	Supp	Strongly support policy H10 as it could help address the chronic lack of affordable housing in Strensall.	Strensall With Towthorpe Parish Council
434	H10	Supp	Support the Council's aspirations to secure 20% affordable housing on Brownfield sites of 15 dwellings or more. A tenure split of 70:30 for Social Rent and Social Discount Sale Dwellings have been agreed for the site. Criterion v. support for the concept of pepper-potting affordable development throughout the development.	Rapeleys LLP on behalf of British Sugar PLC
1498	H10	Supp	Welcome the inclusion for an open book assessment where a developer believe that the policy criteria cannot be fully met.	Lichfields on behalf of Bellway Homes
1661	H10	Supp	The policy allows for open book appraisal to demonstrate that development would not be viable in instances where a developer believes the policy criteria cannot be fully met. Linden homes welcomes the inclusion of this mechanism.	Lichfields on behalf of Linden Homes

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ID	Policy	Obj/Supp/Comm	Summary	Respondent (name of individuals removed)
1675i	H10	Supp	<p>The Policy overlooks the Government’s intention to deliver ‘Starter Homes as part of the Affordable Housing Mix.</p> <p>The Policy should consider inserting an off-site contribution for Self Build Custom Sites as per the Rural Sites.</p> <p>The policy text contains repetition in the last lines.</p> <p>While the 30% affordable housing target is currently not objected to, there are many policies in the Plan that seek ‘Developer Contributions’. We are currently reviewing the cumulative effect those have on viability overall.</p> <p>It would be our preference to see sites over 5Ha delivering 25% affordable housing such that other infrastructure requirements can be funded.</p>	Johnson Mowat on behalf of Taylor Wimpey
1741	H10	Supp	<p>We support the inclusion of direct reference to vacant building credit (VBC). Clarification of the reference to viability assessment in paragraph 5.72 is necessary. Planning Practice Guidance confirms that specific proposals need not be supported by viability assessments to benefit from VBC.</p>	Carter Jonas on behalf of client
2846	H10	Supp	<p>Strongly support policy H10 as it could help address the chronic lack of affordable housing in Strensall.</p>	
5167	H10	Supp	<p>Welcomes the inclusion of the mechanism where the policy allows for open book appraisals to demonstrate that development would not be viable in instances where the developer believes the policy criteria cannot be fully met. This allows a discussion on viability to take place and this is critical to ensure the deliverability of developments to provide much needed new homes.</p>	Lichfields on behalf of Hungate (York) Regeneration Ltd
12659	H10	Supp	<p>Supportive of the affordable housing policy. Specifically supportive of part ii. Also in favour of the text at para 5.66 in relation to avoiding pepper-potting. Point iv, should be amended so that the SHMA is used as guidance only.</p>	Arup on behalf of the York Central Partnership
13213	H10	Supp	<p>The policy rightly seeks to ensure new development contributes towards the provision of affordable housing in the city, recognising that development on brownfield land is likely to be able to contribute proportionally less than its greenfield equivalents.</p>	GVA on behalf of the Homes and Communities Agency (HCA)

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ID	Policy	Obj/Supp/ Comm	Summary	Respondent (name of individuals removed)
13520	H10	Supp	Supports the provision for affordable housing.	Strensall with Towthorpe Neighbourhood Plan Steering Group
13539	H10	Supp	Support direct reference to Vacant Building Credit (VBC) although more clarification is needed.	Carter Jonas on behalf of Picton Capital Ltd
13637i	H10	Supp	Policy H10 deals with affordable housing and CPRE is especially supportive of the recognition that even sites of two units could deliver a financial contribution. Most supportive of point v. That allows the integration of all households across the site and all dwellings are afforded the same level of design. The final paragraph is required to ensure developers do not promises to proved affordable housing to gain planning permission then vary the condition to claim the site is not viable. There are some areas of repetition and this should be checked in the wording.	CPRE - North Yorkshire