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From: [REDACTED]

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To: neighbourhoodplanning@york.gov.uk

Subject: Copmanthorpe Neighbourhood Plan (Reg 16 consultation)

Sensitivity: Normal

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Dear Strategic Planning Policy Team,

Thank you for the opportunity to comment on the submission version of the Copmanthorpe Neighbourhood Plan (CNP). As a resident, I am pleased to record my broad support for the Plan: it offers a locally rooted framework that safeguards Copmanthorpe's distinct identity, provides a measured scale of housing growth on the two Local Plan sites, and places welcome emphasis on green infrastructure and community facilities .

In the spirit of constructive engagement I would like to suggest a small number of enhancements that, in my view, would bring the CNP even closer to current policy aims on climate, nature recovery and social equity, while remaining fully consistent with national and emerging City policy.

- **Climate-positive building standards**

Policy gap: the Plan does not yet set quantitative energy or carbon standards for new development.

Suggested change: add a criterion to Policy CNP2 (Design Principles) requiring all new dwellings and non-residential buildings to meet at least Passivhaus Classic (or equivalent 70 kWh/m² primary energy) and to demonstrate net-zero operational carbon on occupation. This aligns with the Green Party's Zero-Carbon Buildings target and would future-proof homes against rising energy costs .

- **Low-carbon and active transport**

Policy gap: walking and cycling links are mentioned, but there is no explicit modal-shift or parking policy.

Suggested change: insert a new sub-paragraph under CNP2(3) requiring:

- Direct, lit and overlooked pedestrian/cycle routes to York-Leeds cycle corridors and village amenities.
- Secure communal bike and e-bike storage for every dwelling.
- EV-ready infrastructure and a shared car-club space on each major site.

This would complement the Plan's aim to mitigate additional traffic on Manor Heath and Tadcaster Road .

- **Biodiversity net gain and nature recovery**

Policy gap: CNP7 expects enhancement but does not set a measurable target.

Suggested change: require a minimum 20 per cent biodiversity net gain (BNG) on all schemes and a 30-year management plan, in line with current national best practice .

Additionally, identify opportunities for a parish-scale Nature Recovery Network linking Askham Bog SSSI to village green corridors.

- **Sustainable drainage and flood resilience**

Suggested change: add to CNP7(3) a requirement for multifunctional SuDS features (e.g. rain gardens, swales) on all developments, designed to green streets, attenuate surface water and protect the hydrology of Askham Bog .

- **Community-scale renewable energy**

Issue: Earlier consultation material states that "non-domestic scale renewable energy projects will not be permitted within the Parish" . A blanket ban risks preventing solar arrays on public buildings or community-owned ground-mounted schemes that would support the city's 2030 zero-carbon ambition.

Suggested change: replace the prohibition with a positive criterion-based policy supporting appropriately sited, small-and medium-scale renewables (rooftop solar, heat pumps, battery storage and, where landscape impact is acceptable, solar or wind farms).

- **Affordable and community-led housing**

Suggested change: strengthen Policy CNP3 by encouraging Community Land Trust, co-operative or self-build models to deliver genuinely affordable, tenure-secure homes, alongside the Plan's welcome local-occupancy provisions .

- **Dark-sky friendly lighting**

Introduce a requirement within CNP2 for low-energy, downward-facing external lighting to protect wildlife and residents from light pollution.

- **Additional representation – front-garden greening, heat-resilient design and protection of domestic habitats**

- Policy CNP2 already expects discrete parking and good walking-cycling links, but it does not yet deal with the cumulative loss of vegetated front gardens, nor with the urban-heat or run-off consequences of impermeable hard-standings.
- The Evidence Base stresses the importance of hedgerows, mature trees and small water features for landscape character and ecological connectivity, yet these features on private plots are currently unprotected.
- Requested modifications

(1) Insert a new criterion (f) under Policy CNP2 – Design Principles

Residential plots must retain a minimum of 50 % soft-landscaped or green cover within the front curtilage. Where hard surfacing is required for access or parking it must be constructed with permeable materials and designed to direct run-off to on-plot rain gardens or soakaways. The removal of boundary hedges, mature trees or ponds to create parking will be resisted unless it can be demonstrated that the loss is unavoidable and that equivalent biodiversity value will be provided on-site.

Rationale: This mirrors paragraph 131 of the National Planning Policy Framework (NPPF) on tree canopy and paragraph 167 on managing flood-risk through sustainable drainage, while giving Copmanthorpe a clear, measurable standard.

(2) Amend Policy CNP7 – Green Infrastructure

After the first sentence add:

Development proposals—including householder applications—must demonstrate how existing garden habitats (trees, hedgerows, lawns, ponds) will be retained, enhanced and connected to the parish-wide green-infrastructure network shown on Map CNP-GI. A minimum 20 % biodiversity net gain will be expected for any unavoidable loss.

(3) Include supporting text in the reasoned justification

Front gardens provide shade, evaporative cooling, wildlife habitat and on-plot storage of stormwater. Studies for the Environment Agency show they can reduce local peak surface-water flows by up to 50 % during intense rainfall. Retaining vegetated frontages and using permeable surfacing will therefore help Copmanthorpe adapt to more frequent heatwaves and cloudbursts.

- Why these changes are proportionate

- They refine existing design and green-infrastructure policies rather than altering the spatial strategy, so they would normally be treated as minor modifications.
- They align with emerging practice elsewhere in the York area, meaning they should not require a fresh Strategic Environmental Assessment.
- The examiner can incorporate the wording directly without hindering the referendum timetable.

The above suggestions are intended to reinforce the CNP's core objectives while ensuring that growth in Copmanthorpe contributes fully to the City of York's climate-emergency response and to the principles of environmental stewardship.

I would be grateful if you could:

1. Record this representation as duly made, and
2. Notify me of the Council's decision under Regulation 19 and of any subsequent referendum arrangements.

I confirm that I have read and accept the Strategic Planning Policy Privacy Notice.

Best regards,

[Redacted signature]

[Redacted name]

[Redacted address line 1]

[Redacted address line 2]