Summary of responses to the Copmanthorpe Neighbourhood Plan Submission consultation:

Consultation on the Submission version of the Copmanthorpe Neighbourhood Plan commenced on Wednesday 26th March 2025 and ended on Wednesday 14th May 2025. All documents were made available to viewing on the Council's dedicated Copmanthorpe Neighbourhood Plan webpage, with a link to it on the Copmanthorpe Parish Council website. Copies of the documents were made available for viewing at the City of York Council's West Offices, York Explore Library and Copmanthorpe Library. All residents and businesses within the Parish, as well as the statutory consultees, were notified of the consultation by letter or email.

The Examination into the Copmanthorpe Neighbourhood Plan, by Andrew Ashcroft (Independent Examiner) commenced on Monday 2nd June 2025.

Below is a summary of all representations received.

Respondent	**Comment**	**CYC response (where necessary)**
1) National Highways	Little formal comment to make on behalf of the Secretary of State for Transport. It remains that any planned development already identified in the wider LP consultations for York have already been accounted for between National Highways and themselves, and that the council has our extant comments for the current LP and those sites which are identified for housing within Copmanthorpe. This will obviously extend forward to the next plan period and the work we will be undertaking together moving forwards after the most recently adopted new Local Plan. This will subsume all the local parish council's own aspirations (to be outlined by the neighbourhood plan documents I receive from them). The recently revised NPPF may or may not bring about a future review of housing numbers identified and the locations for such sites, and it would be for York Council to address this if they so wish.	Noted.

	I note that the published documents outline the aspirations for the area, with a focus on maintaining the feel and character of the local area when considering future development. The Neighbourhood Plan does not however specifically identify any new housing sites or employment related sites above those already identified in the wider York Local Plan – nor are scale and nature of future aspirations above these identified. As such any impact from new employment and/or housing sites proposed here would be subsumed into the Council's existing calculations and evidence base (submitted at the last Examination in Public). Should new developments be forthcoming which sit outside of the existing LP settlement plans i.e. new housing, employment, or retail sites, we would look to review these with York City Council in the usual manner with any supporting mitigation they may require on the Strategic Road Network. The current consultation shows the wider aspirations of the neighbourhood plan in a positive light, and this is welcomed. The proximity of the SRN under my own jurisdiction is to the North of the settlement, namely the A64, which is accessed via the local road network. As with all development within the district boundary, it is expected that the aggregated impact of all neighbourhood plans will link to the growing congestion and impacts on the SRN, for which the Council will need to continue to address in their wider IDP proposals to ensure a sound local plan infrastructure offering. At this time therefore, I will continue my work with the Council to identify any specific sites which may have a significant impact to the continued safe operation of the network, and furthermore ensure the Council then continues to ensure financial contributions	

	are collected from developers to provide any necessary mitigation on the SRN.	

2) Private resident	I have several concerns that do not appear to have been addressed.
	
	• Whilst it is stated that the village is well connected and acknowledges to where people commute, there is no mention of infrastructure improvements:
	  ○ Access and egress to the village is increasingly difficult at the junction with Manor Heath and the ring road, especially turning right especially during peak times, but becoming more frequent.
	  ○ Turning right on the loop road to access the village, though signed as not allowed, is not sufficiently deterred by the road layout.
	  ○ The slip road from the A64 at peak times is becoming dangerous with cars now more frequently spilling back onto the main carriageway.
	  ○ The bus service is inadequate:
	  ▪ Both the 13 and Coastliner come within 5 minutes of each other, so the alleged 4 buses an hour in reality is only 2.
	  ▪ The number 13 village loop (Merchant way) picks up travellers to York in a morning for work, but then fails to do the same to to drop them off in an evening. The loop is often missed out on the way in to the village if there is no-one on the bus needing it, but then also fails to pick up on the way out.
	  ▪ The special offer of travel to the seaside for £2 in the summer means that late finishing
		Noted.

	workers cannot get a bus back from town as it is full of £2 fare seaside visitors. (We are lucky as we can afford a taxi in such circumstances). Whilst not a direct consequence of the plan, it needs addressing as part of the plan to ensure services are relevant. ○ Doctor and dentist services are inadequate for the village, and again increasingly so. Nothing in the plan addresses this issue. ○ The school is already full yet we are about to increase the population with no increase in faculty or funding for the school, yet the plan talks of more young people and families. ○ The road network is in need of refurbishment, but is left. ○ The proposed move to a 20mph limit across the board is inappropriate for parts of the village and is not addressed in the plan. ○ Dog fouling is a constant problem, and no more so than the green lane towards the railway that goes through the village. This will increase especially at the new development on Top Lane. ○ Existing housing along the green lane needs secure fencing as it will be more used by pedestrians as well as those walking dogs. I would like to see a broad addressing of the issues we face as a village alongside the plan to assure those of us already living there that the character of the village genuinely is maintained as mentioned in the plan. I could continue, but for now, I see there is	

	much work to be done to bring this plan into the real world. Unlike some, I am not opposed to the two new developments, but I would like to see the impact of those developments assessed more thoroughly and the issues addressed.	
3) York Consortium Drainage Boards	We do not have any specific comments on the plan but we are happy for the Parish Council to state that any applicant is always welcome to contact the Drainage Board for any pre-application advice in terms of any new proposed developments and/or works close to a watercourse if this would assist.	Noted.
4) Private resident	As a long term resident of Copmanthorpe, I'm fully supportive of the neighbourhood plan for the village. The Parish Council has done a first-class job in creating the plan, based on submissions and views from the residents of Copmanthorpe. It's clear that we need to play our part in expanding the housing stock in York. The plan acknowledges this fact whilst carefully including the concerns of those who live in the village and wish to conserve it's rural identity.	Noted.
5) Private resident	First I would like to thank and congratulate all those involved in producing this most comprehensive and fact filled piece of work. I read the documents with a great deal of interest and whilst I did not agree with the original submissions, I do believe that this current draft is the best outcome for the planned developments if we are to fulfil the required criteria. My concern is that some of the infrastructure in the village, eg. Medical Provision, school places and the inevitable increased traffic flow might cause some real problems unless addressed stringently.	Noted. .
6) Private resident	This Plan is a well thought-out document, based on detailed research carried out over a period of years.	Noted.

	The initial residents' survey gave clear guidelines and indications of how the residents wanted to see the village grow and develop in the future. The results of this survey were used to shape the direction of the Plan and any further building in the village. The Plan takes into account the results of the other surveys and consultations, which were undertaken during the process of compiling evidence, to ensure the best possible outcome for the village in the future. It is evident from the documents that great care was taken to garner as much valid and relevant information as possible in order to fully inform the process of writing the Plan and to adhere to the resultant findings. The Plan provides a clear strategy for the future development, growth and safeguarding of this ancient village and I fully support it.	
7) Private resident	I am fully in support of this document	Noted.
8) Private resident	I am fully in support of this excellent document	Noted.
9) Private resident	I think the Copmanthorpe Neighbourhood Plan should be approved and adopted. The effort that has gone into producing this plan is terrific, the number of residents who expressed an opinion shows the strength of feeling existing in the village at the time. Judging by a recent village meeting regarding traffic, there is still very strong feeling that the character of the village must be maintained. The Neighbourhood plan is an excellent way to achieve that.	Noted.
10) North Yorkshire Police (Designing Out Crime)	It is accepted that any planning application would be subject of policies in the National Planning Policy Framework (NPPF) and Local Authority Plan, which include policies around the prevention of crime and disorder and ensuring that any new developments are safe for all users. This does not preclude the Neighbourhood Plan	Noted.

	from containing a policy in relation to Designing Out Crime and therefore consideration could be given to including such a policy or incorporating wording into an existing policy, such as CNP2: Design principles. An example of suitable wording would be: “Proposals will be expected to demonstrate how the design has been influenced by the need to plan positively to reduce crime and the fear of crime and how this will be achieved. “ The Neighbourhood Plan also includes a specific policy relating to affordable housing (Policy CNP3). Consideration could be given to introducing a section to this policy to promote the creation of cohesive communities by making affordable housing "tenure blind", This means ensuring that affordable housing units are indistinguishable from open market properties in terms of design and are evenly distributed throughout the development site. Policy CNP5 indicates that where land becomes available applications for community uses including allotments will be supported. It should be noted that if not properly secure, these types of facilities can generate complaints of crime such as theft and damage, or anti-social behaviour. Therefore, consideration could be given to including a section in this policy to indicate that any application for allotments will need to demonstrate that suitable fencing and gates will be installed to provide an appropriate level of security. Similarly, in relation to sports and leisure facilities, these should be well overlooked to provide a sense of guardianship to deter	

	criminal or anti-social activity and consideration could be given to incorporating wording in this policy to reflect this.	
11) Cllr C. Steward	I wish to express my support for the Copmanthorpe Neighbourhood Plan. It is notable how long it has been since the plan started and I am incredibly grateful to the team of villagers that has worked so hard on delivering what I think is a plan that would be very welcome for the village.	Noted.
12) Private resident	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.	Noted.

	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 *f) 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.	
13) The Coal Authority	The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. Our records do not indicate the presence of any recorded coal mining features at surface of shallow depth in the Neighbourhood Plan area and on this basis we have no specific comments to make.	Noted.
14) Private resident	I strongly support the proposed Copmanthorpe Neighbourhood Plan (CNP) for the following reasons: 1. The CNP is based on extensive consultation with the residents of Copmanthorpe. 2. As such, the CNP closely reflects the majority view of the community, particularly with regard to the preferred housing sites at	Noted.

	Tadcaster Road and Moor Lane, Copmanthorpe. These formed the preferred housing sites for Copmanthorpe in the City of York Local Plan (albeit at higher local plan policy densities) and are now under development. 3. The CNP is pro-growth and recognises the contribution Copmanthorpe can make to the housing needs of York. 4. The CNP also recognises the need to preserve amenity for Copmanthorpe residents, and the need to safeguard the York Green Belt especially at the key western gateway to the City for the benefit of all York residents. 5. The CNP has been prepared with considerable guidance and assistance from officers of City of York Council and meets all statutory and policy requirements. 6. The CNP is closely aligned to the now adopted City of York Local Plan 2025. I trust that Copmanthorpe Neighbourhood Plan can now move forward successfully through its final approval stages.	
15) Copmanthorpe Parish Council	We wish to comment in support of the Copmanthorpe Neighbourhood Plan. This document has undergone numerous revisions, over the many years that it has been in production. It is the result of a very great amount of work, carried out by a small number of people, and we are content that it now satisfies all legal requirements. This final document clearly sets out the aspirations of its authors, representing the responses of village residents in comprehensive	Noted.

	surveys carried out during the early stages of the process. We believe It will be a useful tool to manage the pace, scale and variety of development - residential, recreational and commercial - in Copmanthorpe. We therefore wholly support this final document, and look forward to it progressing to local referendum.	
16) Copmanthorpe Neighbourhood Planning Group	Copmanthorpe Neighbourhood Planning Group wish to express our wholehearted support for the submitted Neighbourhood Plan. The culmination of a great deal of work by the group, and the whole village community, over several years we firmly believe that this Plan is the best compromise between the wishes of village residents and businesses to preserve and enhance their environment and the needs of the City of York to provide more housing. During the development of the Plan the Group have drawn on expertise from both the City of York Council and several outside bodies and specialist contractors as well as individual residents who brought their own knowledge to the process.	Noted.
17) Natural England	Natural England does not have any specific comments on this draft neighbourhood plan.	Noted.
18) Private resident	In accordance with your instructions I would like to state that I fully support the Copmanthorpe Neighbourhood Plan	Noted.
19) Savills (on behalf of resident)	Write on behalf of a resident regarding land at Yorkfield Lane / Learmans Way, Copmanthorpe (map provided). The land could potentially be used for residential purposes through an amendment to the Neighbourhood Plan, to incorporate the site to deliver approx. 10 dwellings. The site is considered deliverable and developable in accordance with the NPPF and represents a logical extension to allocated site ref ST31 adjacent to the north, and indeed the site represents a logical extension to the village of	Noted.

	Copmanthorpe in this location. The site adjoins site allocation ref ST31 which is allocated for approximately 158 dwellings the York Local Plan. A Reserved Matters submission (ref: 23/02256/REMM) was approved in February 2024 for a scheme of 140 dwellings by Miller Homes. It's understood that this development is now under construction. The text in Policy CNP1 seemingly contradicts the 'Neighbourhood Plan Sites' plan. As such, in reading the draft policy CNP1 as currently drafted, it is not clear if development at the site would therefore be supported in accordance with the draft Neighbourhood Plan in principle, given it does not form part of site allocation ST31 as set out in the City of York Local Plan. Notwithstanding this, the site is 'white land' within the York Local Plan and is no longer within the Green Belt therefore development could be supported in accordance with the adopted York Local Plan in principle, subject to the usual development management considerations. Further, it should be noted that a total of 140 dwellings are being brought forward by Miller Homes on the adjacent site allocation ST31, as confirmed by the reserved matter submission (approved February 2024), which is 18 dwellings less than that which it is allocated for (total 158 dwellings in the York Local Plan). It is therefore requested that policy CNP1 should be amended.	
20) Yorkshire Wildlife Trust	YWT stand by our previous comments as being our main concerns about the development of this plan due to the proximity of our flagship reserve, Askham Bog. A summary of these comments are as follows: 1.Concern about any negative impact of development on Askham Bog. 2.The Trust would like to see that the important green spaces around the village are enhanced for biodiversity rather than damaged by any development.	Noted.

	3. There could also be potential for extra impacts from an increase in the number of people living nearby. Connecting areas for wildlife will be very valuable in the area. Askham Bog is a very important and unique reserve for the Trust and is designated as an SSSI for its botanical interest. With this in mind It is good to see that an outline ESA1 has been undertaken, “The need for environmental assessment of Neighbourhood Plans stems from […] English law by the Environmental Assessment of Plans and Programmes Regulations (EAPP) 2004”2 The Basic condition statement section of the plan includes the following guidance, “The making of the neighbourhood development plan is not likely to have a significant effect on a European site”.3 We welcome this due to the proximity of Askham Bog, to the proposed housing development (ST31). Regarding the updates relating to our 2017 comment, CNP7 of the plan states, “Developers will be required to ensure that the development of ST31 does not result in damage to the notified features of Askham Bog Site of Special Scientific Interest (SSSI) and nature reserve through changes to the water levels at Askham Bog.” We would be interested in reviewing more information on how this is planned to be monitored and expect to see evidence of this at the next stage of consultation. It would be great to see the incorporation of wildlife friendly features into development areas in your neighbourhood plan, such as sustainable drainage schemes (SUDS). Our second comment at the previous stage of consultation, stated that increasing biodiversity within green spaces within the plan area would be desirable. The NPPF refers to the conservation of the natural environment including biodiversity. YWT was pleased to see reference to the commitment of increasing biodiversity, and that the wording of this clause was amended following our suggestion. Additionally, the ESA screening indicates “There are	

	five sites in the Parish, identified for their Importance for Nature Conservation (SINCS)" and "The Plan policies seek to conserve and enhance the natural and built environment. It seeks, for example, to protect and enhance biodiversity and identifies Local Green Spaces for protection." We would be happy to advise on methods and management for the intended sites mentioned above, in advance of seeing a strategy for these enhancements. The response to our third comment from 2017 has resulted in YWT receiving S106 funding for improvements to Askham Bog, from the Developer of ST31, as a compensatory measure. This was agreed in June 2024. These funds will enable a new boardwalk to be constructed to mitigate the possible negative effects of extra footfall on our reserve. In addition to this it would be helpful to be notified when the CEMP is distributed so we can advise on any additional mitigation required during the construction phase of the housing developments, central to the Copmanthorpe Neighbourhood Plan proposal. If the LPA could advise when this material will be made available, we can provide additional comments. In addition to this, we would ne interested in seeing a management plan for the recreational impacts of increased footfall on the green spaces included in the neighbourhood plan, that will be driven by the housing development. Mitigating the recreational impacts of increased footfall, dog-walkers and cat ownership in the area, as well as an increase in traffic and car usage, will be essential. Not only for Askham Bog, but for the green spaces throughout the parish where Biodiversity is to be encouraged.	
21) Historic England	We have considered the Submission Draft and do not wish to comment further on the proposed Neighbourhood Plan.	Noted.
22) Private resident	I think the document will provide additional planning support to protect the village envelope surrounded by green belt retaining its distinct setting in the locality.	Noted.

	Further housing development of housing can take place within the constraints of the envelope and this should suffice for the next 15 years. Should the proposed business premises area have a specific plan designation area/shading?	
23) Private resident	I fully support the Copmanthorpe Neighbourhood Plan as submitted.	Noted.
24) Environment Agency	**SEA and HRA Screening Reports -** we consider that the conclusions are fair and accurate, and we have no further comments to make in this instance. We do not have any objections to the Publication Draft of the Copmanthorpe Neighbourhood Plan and the Environment Agency support many of the key aims and policy approaches. We will take an opportunity to comment on several identified elements that fall within both our land-use planning remit and links to wider organisational objectives. POLICY 1 HOUSING DEVELOPMENT Page 9 We note there are 2no. allocations for housing which have been set out and correspond in the City of York Local Plan. The Environment Agency recognises there is a need for economic growth and a supply of suitable housing. We support the delivery of this subject to the necessary balance of need and maximising wider local benefits. We would highlight that there will be an expectation that large scale proposals would be able to successfully connect to the main sewer. Developers and applicants should be encouraged to consult with Yorkshire Water at the earliest opportunity to demonstrate the feasibility in any planning application.	Noted.

	Further, there is an opportunity for the Parish Council to integrate any proposed nature habitats and green space with the emerging Local Nature Recovery Strategy. A key mechanism to deliver and contribute towards a network of enhanced habitats is the applied use of Biodiversity Net Gain. Large scale housing developments are now required by legislation to undertake a calculation to determine how the proposal will deliver at least 10% improvement for identified habitats. We support the desired outcome in Intention 2 and note that the Plan has identified pollution and water quality as key issues. The Environment Agency suggests that you may wish to consider revising the text to underline that any related pollution would be unacceptable and a proposal will likely need to clearly demonstrate how it will safely manage discharges to air, water and ground. Additionally, subject to specific characteristics, there may be a wider need to undertake further assessments to protect groundwater and/ or address ecological water quality through the requirements of the Water Framework Directive. The Environment Agency also highlight that there may be achievable opportunities from implementing appropriate sustainable drainage schemes (SuDS) that support and promote positive biodiversity benefits from green infrastructure *SEE ALSO POLICY 2 DESIGN PRINCIPLES AND POLICY 7 GREEN INFASTRUCTURE.* POLICY 2 DESIGN PRINCIPLES We acknowledge and broadly support the aim of this policy. In addition to the directive characteristics as presented (a) – (d), we would also invite the Parish Council to consider how you might maximise enhancement opportunities from applying acceptable links through integration for green space, footpaths and wildlife corridors.	

	THIS COULD LINK TO GREEN INFRASTRUCTURE POLICY 3 AFFORDABLE AND SPECIAL HOUSING No EA comment POLICY 4 LOCAL OCCUPANCY No EA comment POLICY 5 COMMUNITY FACILITIES AND ORGANISATIONS We would again invite you to consider if there has been specific consultations comments and a community need for wildlife habitats as part of green infrastructure delivery. POLICY 6 GREEN BELT We support the aim of this policy. We would however highlight that the Parish Council may be excluding suitable opportunities from the drafted text at Intention 5: "…*the Neighbourhood Plan will not support development within the Green Belt, particularly on land to the west of Copmanthorpe, since this would harm the special character and setting of York at one of its principal approaches*." The Environment Agency recommend you may wish to revise this text or, at the very least, insert a single addition to read, "…*the Neighbourhood Plan will not support* ***inappropriate*** *development within the Green Belt*…" POLICY 7 GREEN INFRASTRUCTURE The Environment Agency would welcome that broader scope is provided, and expectations are established, to reflect that the water environment forms part of the natural environment and is an essential component of green infrastructure. Watercourses and	

	waterbodies perform a critical role in the conservation and enhancement of biodiversity and all ecological habitats. We support any suitable policies on ecology, biodiversity and particularly the relevance for conserving and enhancing the water environment. We especially would like to see an emphasis that watercourses form part of and can also benefit from Green Infrastructure through the application of Biodiversity Net Gain. The Plan correctly highlights that Green Infrastructure could play a vital role in the management of areas at risk from flooding. Climate change will only exacerbate this task. Green infrastructure can perform a key role in the adaptation to and mitigation from climate change. *THIS POLICY SHOULD LINK TO POLICY 1 HOUSING DEVELOPMENT, POLICY 2 DESIGN PRINCIPLES, POLICY 5 COMMUNITY FACILITIES AND ORGANISATIONS POLICY 6 GREEN BELT* POLICY 8 PARISH CONSULTATION Page 21 No EA comment	
25) Peacock & Smith	Our primary concerns with the Submission Draft Local Plan are that it does not reflect revised National Policy in relation to Green Belt; it fails to recognise that the Plan is already out of date in light of the significantly increased housing requirement for York generated by the Revised Standard Methodology; and the Plan does not fully advance sustainable development in that regard. We consider that there is a compelling case for the Plan to adopt a more flexible approach that recognises recent changes in National policy, and to accommodate future development needs. Land to the west of Copmanthorpe, between the A64 Askham Bryan junction and the railway tracks at the southernmost point of the	Noted.

	village, is a logical option to help provide for the increased housing needs now faced by York. The Submission Draft Plan is presented as a long-term local policy framework for Companthorpe covering the period 2022 to 2037 (15 years), however in some respects it is already out of date before it is Examined. Firstly, the Revised NPPF introduces the concept of grey belt and therefore it is quite conceivable that planning applications for new housing development in the Green Belt around Copmanthorpe may be warranted to help address housing needs in the event that a 5 year land supply cannot be maintained in York or the housing delivery test (HDT) falls below 75%. This is a pertinent point given that average annual housing completions for York over the last 3 years have only exceeded the Local Plan requirement figure in a single year, and the last HDT measurement was just 79%. Secondly, the housing requirement upon which the Submission Draft Plan is based has been significantly increased (by around 400 dwellings/annum) following the publication of the Revised Standard Methodology in December 2024. The City Council will need to carry out a review of the Local Plan that reflects this revised housing need figure, and given the inflexible approach of Policy CNP1 of the Submission Draft Plan towards any development other than allocations ST31 and H29 and small scale development, this will render the plan out of date. Indeed, in the context of Para 69 of the Revised NPPF (and 67 of the previous Framework) there is a credible case for pausing work on the Neighbourhood Plan given that the Revised Standard Methodology housing figure for York represents a ‘significant change in circumstances’ in that regard. In the light of the substantially	

	increased housing requirement for York required by the Revised Standard Method, it is questionable whether the Submission Draft Plan represents sustainable development when the social objective as set out in the NPPF requires sufficient homes to be provided to meet the needs of current future generations. Thirdly, Policies CNP1 and CNP6 of the Submitted Draft Plan appear to have been partly justified by a Landscape Character Assessment ("the LCA"), which was prepared in 2015 – some 10 years ago. In this context the NPPF requires that all plans are underpinned by relevant and up-to-date evidence, and with regard to preparing a neighbourhood plan, Planning Practice Guidance (PPG) Paragraph: 040, Reference ID: 41-040-20160211, states that "Proportionate, robust evidence should support the choices made and the approach taken.." The LCA, and other evidence base documents for the Neighbourhood Plan predate both updates to national and local policy. The datedness of the LCA means it should only be applied limited weight in the formulation of emerging policy, and in this instance, its weighting is such that it conflicts with the updated NPPF (2024) and the inevitable outcomes of the imminent York Local Plan review. In the light of the above, we consider that the Submission Draft Plan needs to be amended to provide a more flexible policy framework that recognises the significant recent changes to National policy in respect of Green Belt (in particular grey belt), and the future need for the York Local Plan to be amended to provide for additional housing to meet the requirements of the Revised Standard Method.	

	Furthermore, consideration should be given to identification of additional housing options that have the potential to meet future housing needs. In terms of other housing options, it is considered that land to the west of Copmanthorpe is the logical solution to delivering housing at the settlement, at a scale which will proportionately contribute to addressing the significant shortfall which will imminently occur to York's housing land supply position. Land to the west of Copmanthorpe, between the A64 Askham Bryan junction and the railway tracks at the southernmost point of the village, appears as the only logical extension to the village, and one which would not drastically alter the settlement form. The east coast mainline bypasses the village along a northeast to southwest lineage, and encloses the village and restricts further development to the east/southeast of the settlement. The A64 and railway line represent clear defining boundary features, and the field pattern of land to the west is such that a boundary could readily be created in a north to south direction, such that Copmanthorpe could be developed in a way which would retain it's triangular settlement pattern. Applying these boundaries, it is considered that land to the west of Copmanthorpe could be brought forward as 'grey belt' per the 2024 NPPF, which has evidently not been considered in the Neighbourhood Plan. Whilst the Submission Draft Plan presumes against western expansion of Copmanthorpe, we note that this land is not subject to any landscape or biodiversity designations, and it comprises agricultural land with limited biodiversity habitat. Through residential development there is scope to provide structural	

	landscaping that will achieve a softer interface with the surrounding countryside than the current existing western boundary of the settlement, which is characterised by housing fronting or backing onto the Green Belt, and which provides a hard built edge. Such new development also has the potential to deliver significant biodiversity gains. We also note that the Submitted Draft Plan refers to the previous allocations of land on the western side of the village for housing/safeguarded land in the 2013 Preferred Options Draft Local Plan. Whilst these allocations did not ultimately progress, their status as draft allocations indicates that Officers of the Council were supportive of their development for housing at the time, and they considered that the land was suitable for release from the Green Belt in that regard.	
26) Askham Bryan College	A key overarching concern is that the draft Neighbourhood Plan (NP) is already significantly out of date and does not satisfy the basic conditions required for progression. It fails to have proper regard to national policy and guidance, nor does it accurately reflect the position of the adopted Local Plan — particularly in relation to updated local housing needs and Green Belt designations. Notably, draft NP Policy CN6: Green Belt has been superseded by both the adopted Local Plan and the revised National Planning Policy Framework (NPPF), published in December 2024. The Copmanthorpe Neighbourhood Plan is dated 2022-2037. We have significant concern around much of the evidence base being used for the proposed plan. The first publication of the Copmanthorpe Neighbourhood Plan was in 2014, with refinement in 2017. From our understanding, no further consultation of any substantive nature has been undertaken in relation to the plan. This suggests that we are now at least 8 years from any	Noted.

	meaningful consultation with residents, businesses and wider stakeholders. Additionally, this previous process received respondents from less than 1/3 of the resident population. The Foreword in the plan document (Page 4) is dated 2014 (11 years ago) and from Julian Sturdy MP, he is no longer the constituency MP for York Outer in which the Parish of Copmanthorpe sits. We are unclear on the evidence base for the statement on page 7 that “Copmanthorpe may therefore be considered very much a ‘dormitory village’, a model which, if proposed today, would be rejected as wholly unsustainable”. We would like to understand and see the evidence for this being ‘wholly unsustainable’ We are unclear on the statement under 2. A and 2. B on page 7, particularly how the plan has been adapted to conform with the City of York Council submitted Local Plan, referencing a draft document in February 2018. The Local Plan has been redrafted significantly since this point and was formally adopted in February 2025. We can find no reference to the adopted plan. Page 8, the Community Audit Survey is dated July 2013, 12 years ago. The Housing Quantity Survey was conducted in November 2013, with a further survey in June 2014. These surveys are over 11 years old. The Housing Needs Survey was conducted in June 2014, again 11 years ago. Our assessment would be that such surveys are wholly not reflective or representative of the current needs and demands. We are very concerned that assessments and their justifications are	

	being made on information that is very historic and not representative of the current needs. **CNP1 Housing Development** The Housing development listed uses future tense (i.e. will be, intention is etc) in terms of the 250 dwellings at both the Tadcaster Road and Moor Lane sites. However, both of these sites are currently being developed. We are concerned that the development of 250 houses is historic and means that in the period up to 2037 no further development beyond sites of eight or less units are being proposed within the plan. The statement refers to the 'submitted local plan'. The Local Plan is now adopted and will be subject to review shortly, this is not mentioned within the proposals. The document also refers to the Village Design Statement (VDS), the last published VDS for Copmanthorpe is dated 2003, 22 years ago. It is our understand that VDS should be reviewed and updated periodically, but there isn't a set timeframe for this. The frequency of review should depend on the changes in the local environment and planning context, as well as any significant development proposals. In practice, VDSs should be reviewed every 5-10 years, or when a new Local Plan is being prepared. We are not aware of an updated VDS for Copmanthorpe being part of the new adopted local plan or indeed subsequent to recent large housing developments in the village. **CNP2 Design Principles** Our previous concern relating to the VDS applies to the design principles asserted within this section of the document.	

	Under bullet point 5 we feel that more definition of “appropriate for inclusion within the village-scape of Copmanthorpe would be helpful.” As stated on page 7 of the document, more that of the village residential population growth has occurred since 1961. It would be reasonable to assume that a significant proportion of these individuals reside in houses built during this period. It is unclear what oversight of the ‘village-scape’ has occurred during this period. We would be curious to understand in more detail how this is to be managed moving forward and what indeed ‘local distinctiveness’ and ‘village feel’ (reasoned justification 2) are. **CNP3 Affordable and Special Housing** We agree with the need for affordable housing but are concerned that the evidence base of only 11% of households, collated in 2014 is not an accurate reflection of current need. We are also concerned that there needs to be more focus on the need for affordable housing for younger families; we do not feel that this is stated clearly enough in the intentions. **CNP4 Local Occupancy** We agree that there needs to be consideration and allowance for priority for local occupancy. We are, however, concerned that this only relates to older persons as stated, ‘All affordable housing and older persons housing will be subject to local occupancy restrictions as follows:” The ‘as follows’, states a number of conditions. Within the context of the text this reads as this only applies to ‘older persons’. The intention later refers to younger local people, with local or younger not being defined. **CNP5 Community Facilities and Organisations.** We are supportive of the intentions within this section of the document, however, feel that ‘infrastructure benefits’ need to be	

	clearly measured in terms of impact. We are unclear how the intention for 'additional green space for recreational and leisure uses and additional land for allotments' will be fulfilled. **CNP6 Green Belt** We support the approach that 'very special circumstances' will be considered for development within the green belt. We are also mindful that the City of York approved Local Plan will not fulfil housing need and, therefore, it is likely there will be a call for new sites for development, some of which may be within green belt land. Under reasoned justification 2, 3 and 4, we would challenge the assertions made. 'the ability to see open countryside and the natural horizon – is much prized by Copmanthorpe residents' we are curious to understand how this has been measured. Whilst the A64 to the west of the village is a major route into York, it isn't necessarily the 'principal gateway' by road and suggest that other gateway roads into York A19, A1089, A64 east bound, A59 etc have all seen development that has not impacted the 'special character and setting of the historic City of York'. We do not support the view that the A64 west of the Parish is different as stated in this document. Within the submitted documents we refute and find nothing to support the statement that the A64 fulfils a 'key function of promoting and enhancing the setting of York as a prime tourist destination'. The Landscape Appraisal carried out for City of York Council by the University of Sheffield Environmental Consultancy took place in	

	December 1996, nearly 40 years ago. Much has changed since this assessment and we believe a more up to date assessment is needed to make an accurate assessment and evidencable statements. **CPN7 Green Infrastructure** We refer to our earlier concerns about the Village Design Statement. **CPN8 Parish Council Consultation** We support this approach. **Copmanthorpe Green Infrastructure Map** We note that a proportion of the green infrastructure identified within the map is outside the parish boundaries. The map identifies two outdoor sports facilities at Askham Bryan College. Whilst the College does work with local grassroots teams to allow access to these facilities (including Copmanthorpe FC) these facilities are not open to the public and access is restricted. The map identifies a Children's Play Area at Askham Bryan College. This facility is again not open to public access. The play area sits within the College's Wildlife Park (licenced zoo facility) and can only be accessed by paying visitors to the Wildlife Park. The map identifies an area of woodland to the far west of Askham Bryan Village as a Candidate Site Important to Nature Conservation (SINC). This woodland is owned by Askham Bryan College and is private. The College has not granted permission for any survey of this site, and we are unclear how the site has been designated as an SINC.	
27) City of York Council	We appreciate the amount of hard work and dedication that the Neighbourhood Plan Group and Parish Council has put into this	Noted.

	process to produce a locally representative document, detailing the issues which affect Copmanthorpe Parish. This is particularly appreciated in light of its development in the absence of an adopted Local Plan during the majority of its preparation. Our comments are as follows: <u>Part 1: Copmanthorpe Neighbourhood Plan:</u> • Overall, we consider that the policies in the submitted neighbourhood plan are well written, clear, logical and concise. • <u>General</u>: It is noted that the introductory parts of the document are quite dated and concentrate on the situation around 2013/2014 (the Forewords from David Carr and Julian Saturday MP are from 2014 and have not been updated). The Summary (page 5) still refers to policies in the Plan delivering 135 dwellings (Policy CNP1 has been updated to delivering 250 dwellings in the Parish on sites ST31 and H29, in line with the latest figures in the City of York Local Plan). • <u>General references:</u> references to the Publication Draft City of York Local Plan (2018) should be updated to the Adopted City of York Local Plan (2025) where relevant. NPPF references should also be updated to the December 2024 version of the NPPF where relevant. • <u>Policy CNP6: Green Belt</u> - now needs revision to take account of the adopted City of York Local Plan position (was adopted on 27th February 2025). The adopted York Green Belt is as per the adopted Local Plan. Reference to the RSS Key Diagram and the Christopher Wedgewood vs City of York Council judgement is not now relevant to this policy	

	and should be removed & the policy simplified to reflect the Local Plan position. • Policy CNP7 Green Infrastructure – refers to development of 'Site 1' – should this be ST31? • Mapping: It is noted that there are some inaccuracies in the mapping, as follows: a) The titles of the Copmanthorpe Neighbourhood Plan Green Infrastructure maps (East side and West side of the Parish) are transposed. • b) Ensure that the mapping is up to date. It is noted that the Copmanthorpe Neighbourhood Plan Policies Map (as emailed to the Parish Council on 6/12/24) is not included in the Submitted version of the Neighbourhood Plan. Part 2: Evidence Base and Area Designation: • No comments. Part 3: Strategic Environmental Screening Assessment: • No comments except for changes to policy wording, in line with any policy wording changes required in the actual Neighbourhood Plan (eg. CNP6 Green Belt) Part 4: Basic Conditions Statement: • References in the document should be amended to the adopted City of York Local Plan and the 2024 NPPF where relevant. Part 5: Consultation Statement: • No comments. Part 6: Habitat Regulation Screening Report: • No comments except for changes to policy wording, in line with any policy wording changes required in the actual Neighbourhood Plan (eg. CNP6 Green Belt).	