

Consultation statement



City of York

LDF

Local
Development
Framework

Core Strategy
Consultation
Statement
Regulation 30(1)(e)

January 2012

Contents Page

Introduction.....	1
General Comment.....	4
About the Plan.....	5
Key Diagram.....	6
Section 1: Background.....	7
Section 2: Vision.....	9
Section 3: Spatial Strategy.....	11
Section 4: The Role of York’s Green Belt.....	15
Section 5: York City Centre.....	17
Section 6: York North West.....	19
Section 7 Special Historic and Built Environment.....	22
Section 8: Housing Growth and Distribution.....	23
Section 9: Aiding Choice in the Housing Market.....	26
Section 10 Affordable Housing.....	28
Section 11: Community Facilities.....	29
Section 12: Education, Skills and Training.....	31
Section 13: Sustainable Economic Growth.....	33
Section 14: Retail.....	35
Section 15: Sustainable Transport.....	36
Section 16: Air Quality.....	38
Section 17 Green Infrastructure.....	39
Section 18 Sustainable Design and Construction.....	41
Section 19 Flood Risk.....	43
Section 20: Sustainable Waste Management.....	44
Section 21: Minerals.....	46
Section 22: Infrastructure and Development Contributions.....	47

Annex A: Glossary of Terms.....	49
Annex C: Bibliography.....	50
Sustainability Appraisal.....	51

Appendix A: Statement of Representation Procedure

Appendix B: Notice of Publication

Appendix C: Press Release

Appendix D: Press Article

Appendix E: Your Voice Article

Appendix F: List of Consultations Events and Meetings

Appendix G: List of Specific Consultees

Appendix H: Summary of Consultation Responses

Appendix I: Alphabetical List of Respondents to the Core Strategy Submission (Publication Consultation)

Appendix J: Specific Consultee Letter

Appendix K: General Consultee Letter

Appendix L: Letter of Acknowledgement to Respondents

City of York Council Core Strategy Regulation 30 (1) (e) Statement Summary of Representations Received

1.0 Introduction

- 1.1 The City of York Council published its Core Strategy Submission (Publication) Development Plan Document on 26th September 2011 to allow the local community and other stakeholders to make representations on its legal compliance and soundness.
- 1.2 The Core Strategy Submission (Publication) Document and supporting evidence, including the Core Strategy summary leaflet, Sustainability Appraisal, Habitat Regulations Assessment (Appropriate Assessment), Consultation Statement (Regulation 30 (1) (d)), Infrastructure Delivery Plan, Equalities Impact Assessment, Statement of Representations Procedure (refer to Appendix A) and a series of Topic and Supporting Papers were available to view at the following receptions: City of York Council's 9 St Leonard's Place, Guildhall and Main Library and at all of York's libraries during normal office hours. These documents were also available on the City of York Council's website, together with all of the additional evidence base material.
- 1.3 Specific Consultees received a CD Rom containing all the main consultation documents and details of where they could access the Topic Papers and Evidence Base Documents, refer to Appendix G and Appendix J for more information. Meetings were also arranged with key Specific Consultees, refer to Appendix F for more information. General Consultees were notified by e-mail or letter informing them of the opportunity to comment including details about the representation period and details of where to view the documents, they also received a copy of the summary leaflet, refer to Appendix K for more information. A formal notice, press release and press article were also given in the local newspaper, refer to Appendix B, C and D for more information. An article was also produced for the Autumn 2011 edition of Your Voice, refer to Appendix E for more information. In addition exhibition boards highlighting the Core Strategy consultation were made available at all Ward Committees and officers attended on request, officers manned a City Centre Exhibition and gave presentations to the Council's LSP Partnership Boards and interest forums including the Open Planning Forum, Youth Council and Environment Forum, refer to Appendix F for more Information.
- 1.4 The period for submitting representations ran from Monday 26th September 2011 until Monday 7th November 2011, and representation forms and guidance notes were available in both electronic and paper formats.
- 1.5 This Statement has been prepared in accordance with Regulation 30 (1) (e) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008, in order to provide a summary of:
 - The number of duly made representations received on the Submission (Publication) Core Strategy, and
 - The main issues raised by the representations received.

2.0 Representations

2.1 During the representation period a total of 1385 representations were received from 141 organisations and individuals, refer to Appendix I for further information. Table 1 below summarises the number of representations received for each section of the Core Strategy.

Table 1: The Number of Representations Received on the Submission (Publication) Core Strategy.

Section Name and Number	Number of Representations Received
About the Plan	8
Key Diagram	22
Section 1 Background	71
Section 2 Vision	44
Section 3 Spatial Strategy	271
Section 4 The Role of York's Green Belt	123
Section 5 York City Centre	32
Section 6 York Northwest	57
Section 7 York's Special Historic and Built Environment	32
Section 8 Housing Growth and Distribution	178
Section 9 Aiding Choice in the Housing Market	88
Section 10 Affordable Housing	53
Section 11 Community Facilities	20
Section 12 Education, Skills and Training	20
Section 13 Sustainable Economic Growth	78
Section 14 Retail	31
Section 15 Sustainable Transport	51
Section 16 Air Quality	17
Section 17 Green Infrastructure	46
Section 18 Sustainable Design and Construction	53
Section 19 Flood Risk	12
Section 20 Sustainable Waste Management	16
Section 21 Minerals	10
Section 22 Infrastructure and Developer Contributions	28
Section 23 Delivery and Monitoring	0
General Comments	21
Annex A Glossary of Terms	2
Annex B National Planning Policy Guidance	0
Annex C Bibliography	1
Total	1385

2.2 Table 2 sets out how many of the 1385 representations considered that the Core Strategy was not legally compliant. To be sound the Core Strategy must be justified, effective and consistent with national policy. Table 2 also outlines the number of

representations made against each of these tests of soundness, bearing in mind that consultees were able to select more than one test of soundness when making representations. In such cases consultees were asked to complete a separate sheet for each test of soundness they considered a policy, paragraph or other part of the Core Strategy to fail on. It must be noted that many respondents did not or were unable to specify which of the 3 main tests applied.

Table 2: Legal Compliance and Tests of Soundness

The total number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
103		
The total number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
175		
The total number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 357	Effective: 308	Consistent with National Policy: 225

- 2.3 In addition consultees were asked whether or not they would wish to appear in person as part of the Examination in Public or if they their comments could be considered as written representations. Fifty consultees want to appear as part of the Core Strategy oral examination.
- 2.4 A full set of the representations is being submitted to the Secretary of State alongside the Core Strategy and it's associated documents, the representations will also be available to view at 9 St Leonard's Place Reception, Guildhall Reception, at all of York's libraries and on-line at www.york.gov.uk A summary of the representations can also be found in Appendix H to this document.
- 2.5 An acknowledgement of the representations received to the Core Strategy Submission (Publication) consultation was also sent by the Council to respondents on 5th December 2011. This advised them of their respondent number and a summary of each representation made. The letter of acknowledgment also asked respondents to check they were happy with the summary of their comments. We gave respondents 3 weeks to ensure they were correct. Please refer to Appendix L to see a copy of the acknowledgement letter.
- 2.6 The main issues raised in relation to each section of the Core Strategy are summarised below.

3.0 General Comments

- 3.1 During the representation period a total of 21 general comments were received which cannot be assigned to specific section or policy. 8 of these were objections, 5 were in support and there were 8 comments. Table 3 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 3. General Comments		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
2		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
1		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 1	Effective: 3	Consistent with National Policy: 1

Issues Raised

- 3.2 Several respondents suggested that there are gaps in the evidence base, such as an Environmental Capacity Study. Sport England commented that there is need for evidence base material to deliver new sports and recreation facilities funded by developers, in accordance with national planning policy guidance. It has also been suggested by another respondent that reference needs to be made to additional documents, such as the Natural Environment White Paper (2011). Comments were received stating that the Core Strategy fails to reflect the positive and aspirational aspects of the draft National Planning Policy Framework and that it does not adequately identify York's role in economic development at a sub regional level.
- 3.3 One respondent commented that the natural environment is also our heritage and as such, the 'York's Special Historic and Built Environment' theme of the Vision should be reworded to include the natural environment.
- 3.4 It has been suggested that a policy should be added that seeks to protect and enhance existing cultural facilities (over and above the National Railway Museum). It has also been suggested that flexibility should be added as a key attribute running through the policies and objectives of the plan as the Core Strategy should have flexibility to respond quickly to changes in economic circumstances.
- 3.5 One respondent stated that the document as a whole was not sufficiently visionary, based on speculation of what is likely rather than any radical ideas. Another respondent felt that the document could be made simpler and easier to read.
- 3.6 The Highways Agency commented that it would be useful to understand the timetable for delivery of Supplementary Planning Documents and options the Council considered should they not progress.

4.0 About the Plan

4.1 During the representation period a total of 8 comments were received in relation to the About the Plan section, all 8 comments were objections. Table 4 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 4. About the Plan		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
2		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
0		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 2	Effective: 2	Consistent with National Policy: 2

Issues Raised

4.2 Comments received suggested that the description of the LDF set out in the About the Plan section is not in conformity with national planning policy as it does not mention sustainable development and the role the Core Strategy has in promoting the objectives of sustainable development (as defined in Planning Policy Statement 1 or draft National Planning Policy Framework). It was also considered that reference to development 'being brought forward to meet local needs' is misleading as it does not recognise the important role York plays within the Yorkshire and Humber region.

5.0 Key Diagram

- 5.1 A total of 22 responses were received to the Key Diagram, of which 21 were objections and 1 was a general comment. Table 5 below shows how the representations relate to Legal Compliance and Soundness.

Table 5. Key Diagram		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
1		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
3		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 7	Effective: 5	Consistent with National Policy: 5

Issues Raised

- 5.2 One comment identified that the extent of the Green Belt shown on the Key Diagram is unsupported by evidence of any need for it.
- 5.3 Several issues were raised in response to the extent of the urban area and Green Belt shown on the key diagram, including in relation to Germany Beck and the proposed Areas of Search.

6.0 Section 1: Background

- 6.1 A total of 71 responses were received to the Background Section, of which 5 were supports, 56 were objections and 10 were general comments. Table 6 below shows how the representations relate to Legal Compliance and Soundness.

Table 6. Section 1: Background		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
8		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
13		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 14	Effective: 11	Consistent with National Policy: 10

Issues Raised

- 6.2 A variety of Regional and Sub-regional issues and concerns were raised. One respondent stated that the Background Section does not refer to the place of the City within the Region, yet the draft National Planning Policy Framework requires local planning authorities to work together to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Concern was also expressed about the lack of acknowledgement of York's membership of the York and North Yorkshire Local Enterprise Partnership or the work on the Leeds City Region Local Enterprise Partnership (LEP). One respondent had concerns that as the Council is not seeking to deliver RSS housing requirements and the employment requirement was halved, there is no evidence to show that the views and strategies of adjoining local authorities had been taken on board. This is of particular concern, given that it is suggested that principal cross boundary relationships are with Selby District Council to the south, City of Leeds to the west and East Riding to the east – and that the approach could potentially not be consistent with those approaches. It was also suggested that paragraph 1.26 fails to mention the important role York plays within the York and North Yorkshire Sub Region in terms of employment.
- 6.3 English Heritage supported the fact that the Background section provides a good overview of the historic and environmental challenges, and the recognition that economic success must be delivered in a way which respects the City's unique character. However it was suggested by another respondent that paragraph 1.15 fails to recognise that the role of the Green Belt has been established which is to protect the setting and character of the historic City. The respondent carried on to say it fails to recognise that once the Yorkshire and Humber Plan has been revoked, there is a question over whether the general extent of the Green Belt will continue to exist, given the statutory basis for establishing the designation will disappear.

- 6.4 Transport and air quality issues were also highlighted by respondent. It was suggested that in order to secure adequate reductions in CO₂ from transport, drastic action will be required, which may be unpopular. Consequently, it is critical that a clear plan is set out, with solid reasoning, which will include further consideration of improved public transport. Another respondent suggested that in order to have a public transport system which adequately supports development, a fundamental re-envisaging of the city's transport system should be undertaken which ultimately results in the City's core being car free.
- 6.5 One respondent had concerns that the SHMA is based on findings from 2007, before the major changes in the housing market and wider economy. Consequently the basis for the Core Strategy needs updating to give the current housing and economic issues.
- 6.6 Another respondent had concerns, that paragraph 1.46 (Community Facilities) had been inserted to facilitate the building of the new Community Stadium at Monks Cross. It was suggested that there is a need for strategic planning through the LDF to deliver city-wide and large-scale sports and community facilities to adhere to strategic planning elements embedded in the LDF and not pressures from developers or other influential sources, especially with regard to the sustainability of any new stadium.

7.0 Section 2: Vision

- 7.1 A total of 44 responses were received to the Vision Section, of which 9 were supports, 32 were objections and 3 were general comments. Table 7 below shows how the representations relate to legal compliance and soundness.

Table 7. Section 2: Vision		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
4		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
8		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 7	Effective: 7	Consistent with National Policy: 6

Issues Raised

- 7.2 Respondents made several general comments regarding the vision and also detailed points relating to the specific themes.

General

- 7.3 At a high level it was suggested that the vision needed to be set within a global context not just of opportunity but also of vulnerability. With regard to National Policy it was indicated that the Government's growth agenda wasn't adequately picked up. From a regional perspective it was questioned whether York should be a key driver in the region given its characteristics as a compact historic city. Another respondent, however, supported the intention to take 'lead role' at centre of wide functional sub-area, but felt this wasn't picked up in the plans approach to growth. At a more detailed level a respondent suggested that the economic values and cost savings from the natural environment and ecosystem services should be included and Sport England welcomed the reference to sport within the vision, in particular the new swimming pool at the University. English Heritage (Yorkshire and Humber Region) supported preservation and enhancement of heritage assets, key element of views of the Minster were suggested by some as missing and should be referenced.

York's Special Historic and Built Environment

- 7.4 English Heritage supported and particularly endorsed that heritage assets are an essential component of continued economic success; the identification of key elements contributing to special historic character and recognition of the primary purpose of the Green Belt. In addition English Heritage indicated that they felt that

the six characteristics that the *Heritage Topic Paper and Heritage Impact Appraisal* (2011) identified as contributing to the special character and setting of York should be included within the vision. The term “Special Historic and Built Environment” was questioned with the suggestion it should be changed to “Special Environmental and Archaeological Heritage” because of the need to include other heritage assets such as green infrastructure. It was also indicated that reference to the primary function of York’s Green Belt being to preserve its setting and special character was factually incorrect and is not in accordance with Yorkshire and Humber Plan. Instead the word “historic” should be inserted before “setting” and “character”.

Building Confident, Creative & Inclusive Communities

- 7.5 It was stressed that there is a need to build flexibility into the Core Strategy approach to ensure required level of land can be provided. A specific objection was made to the approach of extensions to main built up areas only being brought forward for development if necessary to ensure supply in later part of plan period.

A Prosperous and Thriving Economy

- 7.6 Comments related to the retail aspect of the vision with a respondent objecting to the reference made to Department stores indicating that they will not increase the attractiveness of York as a destination. Another respondent indicated that the commitment to sequential development must not be dropped. One respondent commended the commitment to promotion of a low carbon economy.

A Leading Environmentally Friendly City

- 7.7 With regard to York’s Green Belt it was suggested that because of its primary purpose it would be better covered under the part of the vision relating to York’s Special Historic and Built Environment. The interpretation of special character and setting of York as the purpose for Green Belt designation was also questioned. Also respondents, including English Heritage, indicated that to conform to national guidance it should have an end date beyond 2031.
- 7.8 Other detailed comments were also provided on this component of the vision. It was felt by a respondent that the LDF should not cover the need to "ensure that future development is designed and constructed in a sustainable way" as this is part of the Building Regulations. A specific point was made by English Heritage (Yorkshire and the Humber Region) in relation to the use of the terminology of “striking an appropriate balance between physical growth and environmental sustainability” with the suggestion it was too loose with the need to ensure that environmental consequences are adequately understood and managed. It was also suggested that the reference to ambitious targets for renewable energy generation was reflected in the current targets.

8.0 Section 3: Spatial Strategy

- 8.1 In total, 271 responses were made in relation to the Spatial Strategy, of which 238 were objections, 26 supports and 7 general comments. Table 8 below outlines how these responses relate to the Legal Compliance and Soundness of the Core Strategy.

Table. 8 Section 3: Spatial Strategy		
Spatial Principle 1		
Spatial Principle 2		
Spatial Principle 3		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
15		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
27		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 87	Effective: 63	Consistent with National Policy: 46

Issues Raised

General Comments

- 8.2 Several respondents considered that additional issues should have been considered in determining the spatial strategy such as; demonstrating whether the proposed level of growth can be accommodated without compromising the special character and setting of the city and environmental sustainability through an environmental capacity study; an examination of the role of settlements to explore a more challenging spatial strategy that goes beyond continuing with the current settlement pattern; and the importance of manufacturing and export sectors as a discrete employment sector. It was also suggested that a proper assessment of housing and employment needs had not been undertaken and that the forecast of population growth is unconvincing given economic climate and changing composition of households. Several further comments were received in relation to housing need and targets which are discussed under Section 8.
- 8.3 The Environment Agency commented that land contamination is a material planning consideration in the preparation of development plan documents and highlighted that there is no reference to land contamination or how it will be taken into consideration in the spatial strategy. Comments were received suggesting that the presumption in favour of brownfield sites is no longer consistent with national policy and that the distribution of employment sites has not been considered in sufficient depth. Another

respondent suggested that the term ‘sub regional city’ is unclear and has negative connotations. One respondent commented that looking at the three spatial principles together highlights their inadequacy as there is no quantum of development to be distributed. Comments were also received stating that major changes have been made to the Core Strategy, including the spatial strategy without public consultation.

Strategic Objectives

- 8.4 One respondent suggested that the strategic objectives should recognise that not all brownfield sites can be brought forward due to technical and financial constraints. Without this it is considered that the plan is not flexible or in accordance with national planning policy. There was however support from English Heritage for the protection of the unique character and setting of York afforded by the strategic objectives.

Spatial Principle 1

- 8.5 Several comments were made in support of the Settlement Hierarchy, in particular its approach in focusing the majority of development on York itself. Some respondents disagreed with the places identified in the settlement hierarchy and proposed additional settlements to be included or suggested reclassification of some settlements. For example, Clifton Moor and Monks Cross being added as District Centres, Strensall/Towthorpe being reclassified as a Village rather than a Large Village, Copmanthorpe being reclassified as a Large Village rather than a Village and Fordlands Road and Heslington Village being reclassified as small villages rather than the main urban area. Other respondents suggested that Spatial Principle 1 should include quantum of development for each level of the hierarchy and that it should state that development in all settlements other than the sub regional city are subject to the development limit/Green Belt boundary to determine the extent and capacity of these settlements. It was also suggested that reference to green belt releases and urban extensions should be referred to under criterion (i).
- 8.6 It was suggested by one respondent that the settlement hierarchy does not recognise the full range of villages and their roles. With regard to criterion (ii) ‘Large Villages’ respondents commented that the approach should provide for appropriate levels of development rather than limited development and that it is unclear what ‘limited development’ means’. It was also suggested that clarification is needed on meeting market and affordable need. Under criterion (iii) ‘Villages’ comments were received suggesting that ‘small scale development’ should be clearly defined and that the approach is contrary to national planning policy as it only refers to providing affordable housing in villages rather than meeting a range of housing needs. For the approach to ‘Small Villages’ under criterion(iv) one respondent queried what was meant by ‘infill only’ and another commented that both ‘redevelopment’ and ‘infill’ should be defined to provide guidance on appropriate scale of development.
- 8.7 A number of respondents provided comments on the maps used to inform the settlement hierarchy (set out in the explanation), suggesting amendments to boundaries, omissions from evidence and additions.

Spatial Principle 2

- 8.8 Several responses noted that Spatial Principle 2 runs contrary to Planning Policy Statement 3, which (while establishing a 60% target for development on previously developed land), does not specify a sequential approach. Others referred to emerging national policy (draft National Planning Policy Framework) no longer prioritising brownfield over greenfield land. In general, these respondents concluded that, by prioritising brownfield before greenfield sites, and focusing principally on delivery of specified major sites, this could mitigate against the release of other (greenfield) sites that could help meet housing needs. They advocated building in more flexibility to ensure that appropriate levels of growth are delivered.
- 8.9 While voicing support for the principle's overall approach in safeguarding special historic character and setting, English Heritage felt that an additional criterion should be added, to ensure that the purposes of Green Belt are not compromised. Natural England supported SP2's approach of incorporating the consideration of Green Infrastructure at a strategic level.

Spatial Principle 3

- 8.10 The sequential approach to development described in Spatial Principle 3 was felt inflexible by several respondents, due to its overreliance on strategic sites and the lack of support for alternatives which would not contravene the overall aims of the plan (such as the sustainable expansion of villages). Fulford Parish Council felt there was overlap and conflict between Spatial Principle 3 with Spatial Principle 1. Those who supported SP3 agreed that priority should be given to the release of brownfield sites.
- 8.11 A number of comments were received in relation to criteria (iii) and (iv) of Spatial Principle 3 and specifically the role of the Areas of Search for both housing and employment. These comments are summarised below:
- There was concern that the shortlisted Areas of Search had not been fairly assessed, including by over-prioritising existing infrastructure capacity and a lack of understanding of the needs of manufacturing industries. This was also considered to undermine the potential for alternatives to be considered;
 - To ensure the Areas of Search are developable, some felt that policy should take a more positive stance and that masterplanning should start now, with a delivery programme set out in the Core Strategy. Other comments suggested that some sites identified as 'strategic' through the Core Strategy should instead be dealt with through the Allocations Development Plan Document;
 - Copmanthorpe Parish Council felt that the assumptions around delivery on brownfield sites were unrealistic and would result in Areas A and B coming forward earlier in the plan period, to the detriment of the Green Belt;
 - Comments were received from Huntington Parish Council, Osbaldwick Parish Council and Fulford Parish Council who, along with a significant number of other respondents, opposed future development within the draft green belt.
 - Amongst others who suggested that further Areas of Search should be identified, Hambleton District Council felt that the Core Strategy should

- include an additional allowance for safeguarded land, to alleviate potential impact on neighbouring authorities beyond the plan period; and
- Murton Parish Council asked that further consideration is given to transport access and the specific boundaries of Areas of Search.

9.0 Section 4: The Role of York’s Green Belt

9.1 A total of 123 comments were made in response to Policy CS1 and the Role of York’s Green Belt chapter. 110 of these were objections, 9 were in support and 4 were general comments. Table 9 below shows how the representations relate to legal compliance and soundness.

Table 9. Section 4. The Role of York’s Green Belt		
Policy CS1: The Role of York’s Green Belt		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
6		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
12		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 46	Effective: 27	Consistent with National Policy: 19

Issues Raised

- 9.2 Extensive comments were received in relation to the Green Belt policy and section. The majority of these raised concerns in relation to the permanence of the Green Belt and proposed Areas of Search. There was support however from a number of respondents for Policy CS1 and the intention to establish a permanent Green Belt.
- 9.3 Some respondents highlighted the scale of large Green Belt development that has occurred over recent years such as Derwenthorpe, Germany Beck and the University expansion and therefore considered that no further development should occur on Green Belt land. Others welcomed the exclusion of areas of land from the Green Belt, such as lands at Monks Cross and at the University of York.
- 9.4 Several respondents raised concerns that York needs an environmental capacity study to determine the level of growth it can take. Several respondents felt that York’s compact character could be damaged by further expansion in to the Green Belt. One respondent supported the reference to not compromising views of the Minster.
- 9.5 It was commented that it would be likely that the land available for housing in the urban area would be exhausted before the end of the plan period. Therefore, some

respondents (mainly house builders and developers) stated that the proposed Areas of Search should be taken out of the Green Belt and allocated for housing at this stage. Whereas, other respondents raised concerns that the Core Strategy does not make it clear that these Areas of Search are not available for housing until all the other housing allocations have been used.

- 9.6 Some respondents used this consultation as an opportunity to promote their specific Green Belt land/site for development purposes.
- 9.7 Concerns were raised over the permanence of the Green Belt, stating that more information was needed on timescales, especially in relation to the Green Belt not lasting beyond the Plan period as currently required by National Planning Policy. Others commented that Green Belt boundaries have been drawn excessively tight rendering it impossible to maintain the degree of permanence that Green Belts should have.
- 9.8 It was acknowledged by some that the Core Strategy needs to provide more strategic guidance in terms of defining the detailed boundary of the Green Belt through the Allocations DPD and to make it clear that it is the role of the Allocations DPD to define specific boundaries and settlement limits, not the Core Strategy's.
- 9.9 Several respondents commented on the level of housing and employment figures being too high which has resulted in the proposed Areas of Search and subsequent loss of the Green Belt and quality agricultural land.
- 9.10 Comments were made in relation to the purposes of the Green Belt picked up in Policy CS1. Several respondents felt that 'conserving the countryside' is not recognised as a purpose of the Green Belt and should be removed. Others felt that all the PPG2 purposes should be picked up more, rather than focussing on preserving the historic character and setting of York.

10.0 Section 5: York City Centre

- 10.1 A total of 32 comments were received pertaining to the York City Centre section including Policy CS2. 26 of these were objections and 6 were in support. Table 10 below shows how the representations relate to legal compliance and soundness.

Table 10. Section 5: York City Centre		
Policy CS2: York City Centre		
The number of respondents that consider the Core Strategy is not legally compliant:		
1		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
9		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 7	Effective: 6	Consistent with National Policy: 3

Issues Raised

- 10.2 Several respondents expressed concern about the feasibility of the provision of the number of dwellings in the city centre stated in Policy CS2 1. Further concerns relating to the lack of detail on location, type, tenure and justification for their delivery were also expressed.
- 10.3 One respondent had reservations about the scale of comparison retail floor space identified for the York Central site, post 2020. This concern in relation to city centre retail was amplified by two other respondents who expressed concern that Policy CS2 conflicts with current council policy to develop out-of-town shopping centres.
- 10.4 Several respondents sought clarification of what an area of change is and what distinguishes such from other 'white' areas (as shown in Figure 5.2). One respondent, although agreeing in principle to the proposed areas of change, considered them to be too large or neither properly defined nor justified.
- 10.5 Several respondents offered comments relating to movement and accessibility around the city centre, including comments on street furniture, highway configurations and the effects of (alcohol) licensing and planning, on the city centre environment. One respondent commended the approach to movement and accessibility, adding that the rivers should be used more as strategic transport links.
- 10.6 One respondent stated that the strategy, for which its purpose is to set out a vision, strategic objectives, targets and policies, does not seem to have them. However English Heritage Yorkshire and the Humber Region supported the Strategic Objectives, particularly the intention to preserve and enhance York's special qualities, distinctiveness and historical assets. It also supported the principles of

Policy CS2.2 and CS2.3, particularly those relating to: enhancing or revitalising the City Centre streets (notably Micklegate), squares, spaces and gateways; extending the footstreets; creating a strong evening economy and adding to the retail offer.

11.0 Section 6: York Northwest

11.1 A total of 57 comments were made in response to Policy CS3 and CS4 and the York Northwest chapter. 37 of these were objections, 11 support and 9 general comments. Tables 11-13 below shows how the representations relate to legal compliance and soundness.

Table 11. Section 6. York Northwest		
York Northwest Corridor		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
0		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
1		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 1	Effective: 0	Consistent with National Policy: 0

Table 12. Section 6. York Northwest		
Policy CS3: York Central Strategic Allocation		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
0		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
1		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 5	Effective: 5	Consistent with National Policy: 4

Table 13. Section 6. York Northwest		
Policy CS4: Former British Sugar/ Manor School Strategic Allocation		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
0		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
6		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 7	Effective: 4	Consistent with National Policy: 3

Issues Raised

- 11.2 Although this chapter combines both strategic allocations; York Central and Former British Sugar/Manor School, the responses received were generally in relation to one or the other. Policy CS3 relates to York Central and CS4 to British Sugar.
- 11.3 Several respondents, including English Heritage Yorkshire and the Humber Region, supported the recognition given to the York Northwest corridor as the most significant area of regeneration in York, and the distinction made between the two strategic allocations in the corridor. English Heritage supported the intention to preserve and enhance the heritage assets of the corridor in the delivery of its development and requirement, in Policy CS3, for York Central to be developed as a place outstanding quality and design complementing the city.
- 11.4 Many respondents raised concerns in relation to the deliverability of the York Central site in the timescale indicated in the targets/policy CS3 and given the current economic climate. It was also questioned whether York Central could physically accommodate the level of growth in terms of offices, housing and retail specified. It was felt by some that more alternatives should be set out in the Core Strategy, including the release of further land (presumably from the Green Belt).
- 11.5 Some respondents commented on the level of social infrastructure proposed as part of the development of the YNW corridor. They raised concerns about the timescales of this provision and also, the level of provision, i.e. will it just meet the needs of the

new development or the wider city. Sport England commented about the number of existing playing fields within the British Sugar/Manor School site, stating that the site is not wholly brownfield and that these need to be replaced if lost to development. One respondent objected to the requirement to maximise linkages with the wider green infrastructure network, stating that enough green space will be provided on site.

- 11.6 A key issue for many, in relation to the British Sugar/Manor School site was the issue of transport and access. One respondent welcomed the reference to an overarching transport masterplan for the York Northwest corridor. However, some felt that the proposed access points for the British Sugar/Manor School site were inappropriate.
- 11.7 One respondent supported the suggestion of a tram-train for serving the British Sugar/Manor School site and the 'designing-in' of halts. However, another respondent objected to the requirement for financial contributions towards tram-train or other public transport initiatives associated with the development of British Sugar/Manor School, stating that this should be assessed as part of a detailed transport assessment.
- 11.8 Similarly to York Central, concerns were raised over the level of development proposed, in terms of the British Sugar/Manor School site's capacity. General feeling was that specific quantum should be determined through detailed assessments and masterplanning, not at this stage. One respondent welcomed the apparent flexibility in the 'around 1295 dwellings' target for the provision of housing. In addition, comments were made about the deliverability of the site in the timescales proposed.

12.0 Section 7: Special Historic and Built Environment

- 12.1 In total, 32 responses were made in relation to policy CS5, of which 24 were objections, 5 supports and 3 general comments. The following table outlines how these responses relate to the Legal Compliance and Soundness of the Core Strategy.

Table 14. Section 7: York's Special Historic and Built Environment		
Policy CS5: Urban Design and the Historic Environment		
The number of respondents that consider the Core Strategy is not legally compliant:		
3		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
4		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 6	Effective: 6	Consistent with National Policy: 5

Issues Raised

- 12.2 English Heritage wholeheartedly supported the approach to CS5, particularly the reference in the policy to the six specified 'Principal Characteristics' which contribute to the special character and setting of York. They suggested that additional targets were added, including to assess impact on those stated characteristics. Others made comments on the length, detail and clarity of CS5's requirements, some stating that the initial section of the policy should be removed and instead re-written as part of the Explanation.
- 12.3 In relation to current and emerging contextual guidance, some commented on the need to ensure that 'untested' policy wasn't introduced through SPDs etc, as this runs contrary to the emerging National Planning Policy Framework. Others felt not enough mention is made of existing SPDs, including Village Design Statements.
- 12.4 One respondent felt that there is a failure to address York's capacity to accommodate the specified levels of growth without irreparable harm to the historic character and setting of the city.

13.0 Section 8: Housing Growth and Distribution

- 13.1 A total of 178 comments were made in response to Policy CS6 and the Housing Growth and Distribution chapter. 167 of these were objections, 3 supports and 8 general comments. Table 15 below shows how the representations relate to legal compliance and soundness.

Table 15. Section 18: Housing Growth and Distribution		
Policy CS6: The Scale and Distribution of New Housing		
The number of respondents that consider the Core Strategy is not legally compliant:		
19		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
12		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 62	Effective: 43	Consistent with National Policy: 31

Issues Raised

Strategic Objective and Targets

- 13.2 Comments were received in relation to the strategic objective being overly rigid which it was suggested could impact upon delivery. Several respondents commented on the targets, suggesting that; they are not in accordance with national policy (PPS3, Draft National Planning Policy Framework, Localism Bill) and regional policy (RSS); they should not be lower for the period 2011-2016; targets for all periods should be increased; the housing requirement should be expressed as an annual average for the lifetime of the plan rather than phased; that housing requirements should be based on 2008 CLG household projections; that growth projections are unlikely to be met and so targets should be lower and that housing targets should either be reduced or sufficient provision made for increased demand in school places arising from growth.

Policy CS6

- 13.3 Concern was raised that Policy CS6 is not sufficiently flexible to ensure the long term development needs can be met without adversely impacting on neighbouring authorities. It was suggested that safeguarded land over and above the areas of search should be identified. Another respondent felt that the assumptions on levels of brownfield land are unrealistic and therefore the Areas of Search will come forward earlier than suggest and development in the Green Belt will be inevitable. One respondent was concerned that the approach in Policy CS6 precludes the

development of other greenfield sites. Several respondents suggesting there is not enough justification and that the approach to housing growth is not based on a robust and credible evidence base. One respondent commented that the evidence for housing and employment land requirements are contradictory and that the Core Strategy is unsound. Several respondents suggested additional sites that should and could be identified as suitable for housing, including extending the Areas of Search. Some respondents objected to land being identified for strategic open space when it is suitable for housing development. Comments were received stating that Policy CS6 will fail to deliver sufficient housing to meet the City's housing needs.

- 13.4 One respondent suggested that Policy CS6 sets housing delivery at a level that protects the Green Belt which is politically acceptable rather than meeting housing needs. Other comments were received suggesting that flexibility needs to be built into Policy CS6 to allow for unforeseen delays in delivery. Detailed comments were also received as to Policy CS6's non compliance with national guidance, such as the presumption in favour of brownfield over Greenfield land and taking a sequential approach. Some respondents felt that there was no evidence that cross boundary working had been undertaken to ensure housing needs of overlapping housing markets are met. Other comments were received that highlighted that the housing growth proposed in Policy CS6 will challenge infrastructure and the debate should go beyond the physical building of houses and be about how the City is going to accommodate this level of growth to ensure there is sufficient capacity to absorb, and cope with additional growth.

Housing Requirement/Identified Supply

- 13.5 While Selby District Council and Ryedale District Council supported the housing target set out in CS6, as a reflection of RSS and more recent CLG household projections, a number of respondents did not agree with the level of housing proposed. Some considered that a higher housing target should be pursued to meet the real level of need, to ensure the Council are planning for economic recovery and encouraging delivery of housing and to avoid exacerbating social divisions. A large number of respondents put forward reasons why the housing requirement should be lower, the majority suggested that previous consultation responses show that residents are opposed to high housing targets that involve taking land out of the Green Belt and that the Strategy should reflect views of the people who live in the City.
- 13.6 Concerns were raised with the methodology used with one respondent suggesting dwelling capacity at identified sites have been over estimated and proposed densities are unrealistic. It was suggested that the Council is unable to demonstrate developable sites for the first ten years. Other comments included concern that some of the identified sites are constrained by contamination issues and required significant infrastructure which will prevent anticipated delivery. Other respondents commented that the approach relies too much on the delivery of the Major Development Opportunities and sites with permission being delivered. Given that the Core Strategy is strategic and largely non site specific it was suggested by one respondent that housing requirement shouldn't be prescriptive to allow for flexibility. Comments were

also received stating that housing and employment growth levels need to be balanced to reduce (or at least not exacerbate) commuting from neighbouring authorities.

Areas of Search

- 13.7 A number of representations were received expressing concern that identifying Areas of Search A and B puts the Green Belt at risk from development and could impact upon the character of York. On the 11th October 2011 the residents of Osbaldwick were given the chance to take part in a Parish Poll. In this poll 355 people (95%) voted “no” when asked whether they agreed with the City of York Council Local Development Framework proposals for future housing development on 250 acres of draft green belt land east of Metcalfe Lane (Area of Search B), 18 people voted in favour. Others commented that the Areas of Search should be brought forward in the immediate term to meet housing needs and that additional areas of search should be identified. It was suggested by several respondents that the Core Strategy should include a programme and timetable setting out what needs to be done and when to ensure that the Areas of Search are deliverable.

Windfalls

- 13.8 Several comments were received with regard to windfalls, suggesting that reliance on windfalls in the first part of the plan period is not only contrary to policy but prevents larger strategic sites that could help deliver housing in the short to medium term from being properly planned. It was also suggested that genuine local circumstances haven't been demonstrated to justify the inclusion of windfalls.

General Comments

- 13.9 A number of respondents commented that there was no opportunity for public consultation before the decision was taken to include Areas of Search A and B or for the cross party LDF Working Group to vote on the revised proposals.

14.0 Section 9: Aiding Choice in the Housing Market

- 14.1 In total, 88 responses were made in relation to Section 9 and policies CS7, CS8 and CS9 of which 84 were objections, 3 supports and 1 general comment. The following table outlines how these responses relate to the Legal Compliance and Soundness of the Core Strategy.

Table 16. Section 9: Aiding Choice in the Housing Market		
Policy CS7: Balancing York's Housing Market		
Policy CS8: Sites for Gypsies, Travellers and Showpeople		
Policy CS9: Housing Density		
The number of respondents that consider the Core Strategy is not legally compliant:		
9		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
11		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 23	Effective: 23	Consistent with National Policy: 18

Issues Raised

- 14.2 Several comments pointed to the need for an updated Housing Market Assessment, to evidence and test the requirements of CS7, in particular the emphasis on delivering houses rather than flatted development.
- 14.3 Further comments noted that the policy's stance that all new homes are built to 'Lifetime Homes' standard came in advance of the national requirement (2013 at the earliest), and was not justified by local evidence.
- 14.4 Student housing pressures were noted: some responses pushed for the allocation of specific student housing sites; others felt that on-campus accommodation should be prioritised. It was suggested that the Council has no means of controlling occupancy and therefore the proposed allocation of housing sites for younger people was felt to be untenable.
- 14.5 The targets stated in CS8 were queried, with alternative, significantly higher figures quoted from the Yorkshire and Humber Regional Assembly's review of Gypsy and Traveller Accommodation Assessments.
- 14.6 Some felt that the policy requirements of CS8 were overly onerous, in particular criteria relating to a site's proximity to the highway and provision of temporary plots within larger sites. An alternative, more prescriptive approach was also submitted,

requiring further policy considerations, including the impact on the green belt, the historic character of the city and to the health and safety of those living locally.

- 14.7 The rigidity of the proposed policy approach in CS9 was questioned, particularly in light of the recession: some queried the deliverability of housing at 75dph, and the market demand for 'higher density' suburban housing (40pdph); others asked for more flexibility in general, in light of CS7's push for the delivery of more family housing. English Heritage felt that the addition of a policy disclaimer would be appropriate, where the distinctive character of a place would be harmed by higher density development.

15.0 Section 10: Affordable Housing

15.1 In total, 53 responses were made in relation to policy CS10 and Section 10 as a whole, of which 49 were objections, 2 supports and 2 general comments. The following table outlines how these responses relate to the Legal Compliance and Soundness of the Core Strategy.

Table 17. Section 10: Affordable Housing		
Policy CS10: Affordable Housing		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
6		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
3		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 13	Effective: 13	Consistent with National Policy: 14

Issues Raised

- 15.2 Several responses stated that affordable housing targets would be overly onerous and, contrary to PPS3, would undermine the potential to deliver low cost market housing. Alternatively, the starting viability target was felt by many to be much too low, with several comments noting that the level of need in York is even greater than the annual level of housebuilding.
- 15.3 In general terms, many comments related to the lack of clarity for the development industry, particularly with the detailed operation of the policy confined to an SPD. This was felt to run contrary to the thrust of PPS12 and the National Planning Policy Framework. Further, the nature of a dynamic target was felt to introduce further uncertainty, making it difficult to assess the viability of schemes going forward. Only one comment supported the flexibility afforded by an annual viability review.
- 15.4 In terms of detail, the following points were made, which impact on overall viability:
- the lack of 'future proofing', in relation to costs associated with enhanced Code for Sustainable Homes requirements;
 - that inadequate evidence exists to justify 20% levels on smaller sites; assumptions around land values and build costs are inaccurate.

16.0 Section 11: Community Facilities

- 16.1 During the representation period a total of 20 comments and observations were received from organisations and individual stakeholders in relation to Community Facilities. Of these 15 were objections, 3 in support and there were 2 comments. Table 18 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 18. Section 11: Community Facilities		
Policy CS11: Community Facilities		
Policy CS12: Healthcare and Emergency Services		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
0		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
2		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 5	Effective: 6	Consistent with National Policy: 2

Issues Raised

- 16.2 Comments were received from one respondent that the targets for this section need strengthening to meet the strategic objective of low carbon neighbourhoods, particularly the accessibility criteria. Another respondent suggested that there should be a presumption in favour of community facilities sited within a walking distance of local neighbourhoods.
- 16.3 There was support for the explanation of what a community facilities can include however one respondent suggested that the definition of community facilities should be expanded and a number of comments were received suggesting specific community that should be listed such as public houses and post offices. One respondent felt that there should be more emphasis on non built community facilities such as outdoor facilities whilst another suggested that provision should be made a skate park in the west of the City. Another respondent commented that the section should acknowledge that some community facility provision will be met by way of access agreements with other providers and that in some cases, these facilities will remain outside community ownership.
- 16.4 Whilst there was strong support for Policy CS11 from some respondents it was suggested by one that Policy CS11 should not require new residential development to provide new or improved community facilities given that the Infrastructure Plan does not identify deficiencies in existing community facilities. It was also considered

that the policy should set out the site size or dwelling thresholds for which contributions for off site infrastructure, such as community facilities, will be required. Another respondent comment that access to cycle routes and outdoor play spaces for children and young people should be included in Policy CS11.

- 16.5 Sport England commented in support of criterion (iv) of Policy CS11 and the protection of existing facilities.

17.0 Section 12: Education, Skills and Training

- 17.1 During the representation period a total of 20 comments and observations were received from organisations and individual stakeholders in relation to Education, Skills and Training. Of these 14 were objections, 1 in support and there were 5 comments. Table 19 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 19. Section 12: Education Skills and Training		
Policy CS13: Education Skills and Training		
Policy CS14: Targeted Recruitment and Training		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
1		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
7		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 2	Effective: 3	Consistent with National Policy: 1

Issues Raised

- 17.2 A number of comments were received stating that Policy CS13 is too permissive and unconstrained which is not sustainable. One respondent suggested that the exact educational requirements and resulting land requirements at the York Northwest corridor should be established through a detailed assessment as part of the masterplanning process. With regard to student housing it was suggested that consideration should be given to the allocation of suitable sites for purpose built student housing. Another respondent felt that the provision of student housing should not be required to be on campus. The University of York commented that Policy CS13 should support the expansion of the Heslington West campus in addition to Heslington East. Another respondent suggested that Policy CS13 should support the creation of sufficient jobs across the skill base to provide York's school and college leavers and graduates with local employment.
- 17.3 Sport England welcomed referenced to maximising opportunities for community sport on school sites. They commented that there are tools available to assist planning for sport on school sites and suggested that given that Government guidance is currently under review wording should be added to ensure that Section 12 is not overtaken by any changes in guidance. Another respondent suggested that it is not made clear that additional school places must be found for York's growing school population. It is suggested that either the housing target be reduced or that

Section 12 include a commitment to build a new primary school to meet York's needs.

- 17.4 Some respondents felt that Policy CS14 should be deleted, proposing that it does not comply with Community Infrastructure Levy Regulations and suggesting that it is not a matter for the LDF or planning policy. One respondent commented that reference should be added to apprenticeship opportunities in the policy. Whilst another comment was received which suggested that there should be framework for green infrastructure/ecosystem services training to link new skills training using University, Colleges and Schools to learn about the countryside. It was also suggested that the informal system for the development of skills for personal development and fulfilment in life should be referenced.

18.0 Section 13: Sustainable Economic Growth

- 18.1 A total of 78 comments were made in response to Policies CS15 and C16 and the Sustainable Economic Growth chapter. 72 of these were objections, 4 supports and 2 general comments. Table 20 below outlines how many of the objections were on the grounds of unsoundness and/or legal compliancy.

Table 20. Section 13: Sustainable Economic Growth		
Policy CS15: Sustainable Economic Growth		
Policy CS16: Employment Land		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
14		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
14		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 16	Effective: 17	Consistent with National Policy: 11

Issues Raised

- 18.2 Several respondents commented on the proposed employment figures set out in the targets. Whilst some felt that 1000 jobs a year is too high in terms of the environmental capacity of York and unrealistic given the current economic climate, others felt that 1000 jobs is inadequate and should be amended (increased) to cover a wider skills range and to include reference to the wider role York has in the region. Several respondent supported the conclusion that York can support a growth level of 1000 jobs per year and to identify land for employment development.
- 18.3 It was commented that policy CS15 should provide more support for existing employment uses and employment in its widest sense, not just 'B' uses. It was suggested that a flexible supportive policy on job creation and job retention is needed. It was also felt that the policy needs to give more support to the rural economy and in particular rural diversification.

- 18.4 It was stated by some that the proposal to safeguard existing employment sites is ineffective as in the recent past existing employment sites have been sacrificed for residential development and that therefore a more honest and realistic drafting of this policy was needed. It was added that the current housing trajectory will mean that it is highly likely that existing employment land will be granted planning permission for housing.
- 18.5 Further comments were received in relation to Policy CS16 which focuses around the adequacy of the land proposed for strategic employment purposes in the policy. Some respondents felt that the supply of land for 'B' Class uses is inadequate and the Core Strategy fails to address current deficiencies let alone make provision for future growth in these sectors. Others felt that the policy criteria will not ensure there is a supply of appropriate sites to meet the full range of market and employment demand during the plan period, and does not provide support for expansion of existing employment sites.
- 18.7 Comments were received about the type of jobs that the chapter recognises/ supports. Concerns were raised that the manufacturing and distribution sector has not been given proper consideration and the types of jobs e.g. Science City York, will not provide suitable employment for those with less academic qualifications.
- 18.8 Concerns were raised in response to the identification of employment types ('B' Class use) for specific strategic sites. It was argued that national planning policy suggests that tight use class restrictions would constrain sustainable economic growth.
- 18.9 Several comments were made in relation to specific sites. For example the Grimston Bar Area of Search proposed at the Preferred Options stage of the Core Strategy should replace the Northminster (Area C) identified in the Submission (Publication) document. However another respondent supported Area of Search C at Northminster. Wheldrake Parish Council highlighted that the area to the east of the Industrial Estate at Wheldrake could be used in the future, however planning decisions should minimise any potential conflict between industrial and residential uses.

19.0 Section 14: Retail

- 19.1 During the representation period a total of 31 comments and observations were received from organisations and individual stakeholders in relation to Retail. These included 22 objections, 6 supports and 3 general comments. Table 21 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 21. Section 14: Retail		
Policy CS17: Distribution of Retail Growth		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
3		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
0		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 8	Effective: 8	Consistent with National Policy: 3

Issues Raised

- 19.2 There was support from some respondents for the approach taken to retail in Policy CS17. In particular the increased commitment to sequential development was welcomed and the recognition that out of centre retail development is appropriate where it satisfies the sequential approach. Another respondent welcomed most of the targets and in particular the target to increase convenience floorspace.
- 19.3 It was suggested that Policy CS17 should set out the Council's approach to future growth at out of centre destinations; this should be more restrictive for the Designer Outlet than for Clifton Moor and Monks Cross due to its location in the Green Belt and outside of the Ring Road. Whilst one respondent welcomed the identification of York Designer Outlet as an out of centre retail destination another respondent felt that Monks Cross should be given greater recognition in this section. Another respondent felt that the potential of the Designer Outlet to contribute additional comparison floorspace should be identified in Policy CS17. Another respondent commented that Policy CS17 is contradictory and does not provide sufficient flexibility. Several respondents suggested that the policy should not prescribe floorspace levels.
- 19.4 Several comments were received about the deliverability of specific retail schemes, including Castle Piccadilly and York Central and what the strategy would be if they cannot be delivered. Concern was also raised about the impact of the community stadium proposals currently going through the planning application procedure on the retail objectives and policy approach.

20.0 Section 15: Sustainable Transport

- 20.1 A total of 51 comments were received pertaining to the Sustainable Transport Chapter including Policy CS18. 39 of these were objections, 6 were in support and there were 6 comments. Table 22 below shows how the representations relate to legal compliance and soundness.

Table 22. Section 15: Sustainable Transport		
Policy CS18: Strategic Transport Priorities		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
1		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
13		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 7	Effective: 13	Consistent with National Policy: 5

Issues Raised

- 20.2 Many respondents stressed the importance of investment in transport infrastructure and one respondent supported the general approach of this chapter. Several respondents expressed concern about the ability of the strategic road network (SRN), particularly the outer ring road, to facilitate economic well being, if the necessary improvements are left to the latter stages of the LDF period. Copmanthorpe Parish Council referred a lack of consideration of the existing capacity and constraints of the Outer Ring Road on the feasibility of the growth rates assumed in the Core Strategy. Wigginton Parish Council advocated that improving the roundabouts on the A1237 should be brought forward to 2011-15. Other respondents supported the delivery of 'Access York Phase I' (which includes improvements to the A1237/A59 roundabout).
- 20.3 Many respondents commented on the deficiencies of public transport and the need for it to be improved. Strensall with Towthorpe Parish Council stated that if further development is considered within Strensall/Towthorpe consideration needs to be given to expansion of public transport [to better serve the area].
- 20.4 There were many differences of opinion in relation to investment in the various forms of transport. For example, some respondents believed York, as a tourist city, was adopting an 'anti-car' policy with too much emphasis on bus use being the cause of congestion, whereas other respondents believed having the public transport infrastructure in place (including the provision of a bus station advocated by some of these respondents) to support development was important. Nether Poppleton Parish Council and Upper Poppleton Parish Council favoured the provision of walking and

cycling facilities alongside the River Ouse as part of developments in the York Northwest corridor. One other respondent also welcomed the commitment to improving accessibility and connectivity for pedestrians, cyclists and public transport users.

- 20.5 Fulford Parish Council referred to Policy CS18 being inextricably linked to the city of York's Local Transport Plan 2011-2031 (LTP3), and being based on the evidence for LTP3, which was produced before the Areas of Search A and B were included as potential urban extensions in the Core Strategy. One respondent suggested that there was a recognition in Policy CS18 (i) that in some circumstances development will not be able to meet the access standards.
- 20.6 The Highways Agency expressed concern that the issue of long distance commuting into York from neighbouring areas and the effects of this on the strategic road network, particularly on the A64, are not adequately addressed. The agency advocated that references to the importance of travel plans and measures to reduce congestion on the A64 (and its junctions) should be included in the Strategic Transport Priorities of Policy CS18.
- 20.7 With regard to reductions in the number of vehicles using the road network another respondent believed that Policy CS18, as written, predetermines that access restrictions will be implemented, without sufficient credible and robust evidence to justify this presumption. The same respondent suggested rewording this aspect of the policy if such evidence exists.
- 20.8 English Heritage offered a variety of comments, additions and suggested changes in relation to the Strategic Objectives, Targets and Policy CS18. Their comments included making references to reductions in the number and size of vehicles and the need to explain that the Council is preparing a City Centre Movement and Accessibility framework and the possible implications for the Core Strategy.

21.0 Section 16: Air Quality

- 21.1 During the representation period a total of 17 comments and observations were received from organisations and individual stakeholders in relation to Air Quality. Of these there were 16 objections and 1 support. Table 23 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 23. Section 16: Air Quality		
Policy CS19: Air Quality		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
2		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
0		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 3	Effective: 6	Consistent with National Policy: 5

Issues Raised

- 21.2 One respondent suggested that the objective to reduce emissions to air and improve air quality will not be achievable given the employment and housing growth proposed. Several respondents commented that the approach to air quality will perpetuate illegal levels of air pollution and that the strategic objectives and targets should be strengthened. One respondent indicated that the objectives and targets should refer to early compliance with European Directives on air quality. Whilst there was some support to the approach to air quality several respondents suggested that air quality will worsen if the approach is not strengthened. It was proposed by one respondent that more radical measures need to be implemented to tackle air quality such as encouraging people to live close to their workplace.
- 21.3 It was suggested that Policy CS19 should define what is meant by an 'acceptable' impact on air quality from development. Another respondent commented that the policy should only apply to specific development proposals that fall within Air Quality Management Areas or be deleted as it was suggested that the Core Strategy should not stipulate supporting documents to be submitted with planning applications as this can be done through the local validation checklist.
- 21.4 Comments were received suggesting that the approach does not adequately discuss the health impacts of air pollution or the links between air quality and transport. In particular it was suggested that reference to the role the Local Transport Plan 3 and transport planning can make to reducing air pollution should be added.

22.0 Section 17: Green Infrastructure

22.1 A total of 46 comments were made in response to Policy CS20 and the Green Infrastructure chapter. 32 of these were objections, 11 support and 3 general comments. Table 24 below shows how the representations relate to legal compliance and soundness.

Table 24. Section 17: Green Infrastructure		
Policy CS20: Strategic Green Infrastructure		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
2		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
14		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 5	Effective: 7	Consistent with National Policy: 4

Issues Raised

- 22.2 The responses received in relation to the Green Infrastructure section and policy range from detailed comments about specific aspects of Green Infrastructure such as woodland whereas others were either more general or related to the wider context, for example the European Landscape Convention. Natural England welcomed the inclusion of green infrastructure and the production of an SPD with associated targets. English Heritage Yorkshire and the Humber Region supported the Strategic Objectives for Green Infrastructure. Strensall with Towthorpe Parish Council supported the initiative to protect green infrastructure.
- 22.3 Several respondents felt that more was needed on the inter-relationship between wildlife and humans. For example, Sport England considered it important that the potential conflicts that can occur between sport and nature conservation should be acknowledged in the policy. Natural England commented that the Accessible Natural Greenspace Standard (ANGSt) has been lost as an indicator.
- 22.4 Some respondents suggested extra targets that should be included or changes to existing targets, such as looking to increase Biodiversity Action Plan (BAP) habitats

as opposed to just woodland creation. It was suggested that a target to develop a playing pitch strategy would help deliver the policy. It was also suggested that a target that measures the management and maintenance by City of York Council staff of the natural environment will help to ensure the protection and enhancement of the natural environment.

- 22.5 Natural England, the Environment Agency and English Heritage supported Policy CS20. Natural England welcomed the incorporation of geo-diversity and the Environment Agency particularly supported the reference to delivering the aspirations of partner strategies.
- 22.6 East Riding of Yorkshire Council welcomed the reference to the Lower Derwent Valley in the Biodiversity Audit and Action Plan. One other respondent supported the provision of buffer zones around Sites of Importance for Nature Conservation (SINC).
- 22.7 Comments were made in relation to the evidence base used to develop policy. For example, it was identified that the Biodiversity Audit had not been formally published and therefore, it was not possible to interrogate sites alongside the Core Strategy. In addition several respondents felt that there was inadequate evidence behind the open space policy and that it should be made clear that further masterplanning worked needs to be undertaken in relation to the 'strategic open space' identified as part of the Areas of Search.

23.0 Section 18: Sustainable Design and Construction

- 23.1 A total of 53 comments were made in response to the Sustainable Design and Construction Chapter including Policy CS21. 45 of these were objections, 5 were in support and there were 3 comments. Table 25 below shows how the representations relate to legal compliance and soundness.

Table 25. Section 18: Sustainable Design and Construction		
Policy CS21: Sustainable Design and Construction		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
2		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
3		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 12	Effective: 13	Consistent with National Policy: 15

Issues Raised

- 23.2 There were a mixture of views over the targets in this chapter. One respondent felt that they were not ambitious enough to support the Climate Change Act, national policy or the Council's Climate Change Strategy, whereas another respondent felt that the renewable energy Mega Watt Targets were unrealistic as they were too high.
- 23.3 Many of the respondents to this chapter raised concerns over policy CS21, respondents felt that the policy went beyond what was required by regulations and guidance at a national level. Some of the respondents simply felt that policy repeated and duplicated matters covered by other statutory codes whereas others felt strongly that prescribing how developers comply with government targets to achieve zero carbon homes from 2016 onwards was contrary to building regulations and national policy. It was felt by others that requiring developers to meet specified Code for Sustainable Homes targets must be justified with a local evidence base. However the Environment Agency highlighted that they supported the policy.
- 23.4 Some respondents felt that all planning applications for new build or refurbishments should incorporate on-site renewable / low carbon energy generation equipment to reduce predicted carbon emissions by at least 10%. One respondent supported just new major developments incorporating on-site renewable / low carbon energy generation equipment to reduce predicted carbon emissions by at least 10%. However another consultee felt that smaller schemes should be kept excluded and the threshold be increased to 15 dwellings. Other respondents felt that the 10% reduction of carbon emissions could be achieved as part of improvements to the

buildings design and this should be included within the policy. English Heritage (Yorkshire and Humber Region) welcomed the recognition that there may be circumstances where it is not possible to incorporate onsite renewable energy or convert some existing buildings to deliver reduced energy consumption levels set out in the policy.

- 23.5 There were a mixture of views over whether developments should submit a Sustainable Energy Statement. Some felt this should be deleted as it is contrary to national guidance whereas others felt it should be extended to all developments.
- 23.6 Several respondents felt strongly that the use of wind turbines is not justified within the Green Belt. Wheldrake Parish Council felt that turbines in the Green Belt would visually detract from the landscape and would not necessarily benefit York because the electricity produced would be connected to the wider grid. Another respondent felt that there was a need to provide more spatial guidance across York which identifies suitable locations for on shore wind developments. The Environment Agency indicated that given SP1, SP2 and SP3 attempted to steer development away from flood zones that this should not be applied to wind turbines as they are essential infrastructure.

24.0 Section 19: Flood Risk

- 24.1 A total of 12 comments were made in response to the Flood Risk Chapter including Policy CS22. 9 of these were objections and 3 were in support. Table 26 below shows how the representations relate to legal compliance and soundness.

Table 26. Section 19: Flood Risk		
Policy CS22: Flood Risk		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
0		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
2		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 2	Effective: 3	Consistent with National Policy: 2

Issues Raised

- 24.2 There were a mixture of views over the whether the flood risk policy was inline with national guidance. One respondent felt that the policy did replicate national guidance whereas the Environment Agency felt that the policy was worded inline with the Council's evidence base document, the Strategic Flood Risk Assessment (SFRA) which was a departure from PPS25. The Environment Agency specifically stressed that the wording in paragraph's 19.2 and 19.3 failed to explain that the Sequential Test should be applied first and passed before the Exception Test is undertaken, it was felt that this needed to be made clearer for it to be inline with national guidance.
- 24.3 Wigginton Parish Council felt that given York's flooding history, high water table and climate change projections paragraph 19.5 should reference all watercourses including the Foss and its tributaries as these are at maximum capacity, in addition it was felt that this paragraph should also set out the economic case for anti-flood investment to minimise the reputational risk to York. Another respondent also objected to paragraph 19.5 and policy CS22, in relation to brownfield run-off rates, it was highlighted that this does not reflect the LDF evidence base and is overly restrictive. However Yorkshire Water supported the need to demonstrate a 30% reduction in brownfield runoff rates and maintain the status quo on Greenfield sites.
- 24.4 Yorkshire Water and Strensall with Towthorpe Parish Council supported the initiative to require all developments to implement Sustainable Drainage Systems where technically feasible and viable.

25.0 Section 20: Sustainable Waste Management

- 25.1 A total of 16 comments were made in response to the Waste Chapter including Policy CS23. 13 of these were objections, 2 were in support and there was 1 comment. Table 27 below shows how the representations relate to legal compliance and soundness.

Table 27. Section 20: Sustainable Waste Management		
Policy CS23: Sustainable Waste Management		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
1		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
0		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 3	Effective: 4	Consistent with National Policy: 5

Issues Raised

- 25.2 There were several concerns in relation to construction and demolition waste. One respondent felt that Policy CS23 needed to be broader to include construction and demolition waste. It was suggested that to be inline with the RSS Policy CS23 should include the provision for secondary and recycled aggregates. In addition it was recognised by the same respondent that it was not clear what provision will be made for larger quantities of construction and demolition waste managed by the private sector, it was indicated that this needs to be clarified. It was also considered that the policy needs to recognise the need for a permanent provision locally to cater for construction and demolition waste arisings from smaller sites and household developments.
- 25.3 Another respondent considered that Policy CS23 (iii) should not require waste management developments, particularly those which would generate renewable / low carbon energy, including heat, to be in conformity with the Spatial Strategy as it is restricting the development of these uses outside of the City of York. It was felt that this goes against national planning policy which states that LDFs should not place locational restrictions on the development of renewable / low carbon energy generating developments. This includes Energy from Waste (EfW) developments. However the Environment Agency supported part (iii) of this policy.
- 25.4 There was a difference of views over the use of EfW. It was felt by one respondent that dealing with waste through the EfW process is inconsistent with government guidance as it would discourage waste being moved up the hierarchy. In addition it was felt that the EfW proposals rely on waste figures projected for 2002 which over

estimate the amount of waste being produced and underestimate the amount being recycled. However another respondent fully supported the EfW disposal technique.

- 25.5 Rufforth with Knapton Parish Council felt that Paragraph 20.18 does not reflect York's Strategic Development Plan for Harewood Whin, namely to import waste from other regions. It was felt that the paragraph should make it clear that Harewood Whin is a facility to deal with arisings from the City of York Council and North Yorkshire County Council only.

26.0 Section 21: Minerals

- 26.1 A total of 10 comments were made in response to Policy CS24 and the Minerals Chapter as a whole. Of these were 7 objections and 3 were in support. Table 28 below shows how the representations relate to legal compliance and soundness.

Table 28. Section 21: Minerals		
Policy CS24: Safeguarding Mineral Resources and Local Amenity		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
0		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
3		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 0	Effective: 2	Consistent with National Policy: 2

Issues Raised

- 26.2 The responses received in relation to the Minerals Section range from specific comments such as the need to include the extraction of methane gas to more general comments relating to safeguarding minerals areas across the whole of the York area.
- 26.3 Several respondents suggested amendments to the minerals policy. One respondent felt that Policy CS24 should be amended to refer to the requirement of secondary aggregates, or substitutes, and not just the re-use of materials found onsite however another respondent supported minimising consumption of minerals in construction. It was also felt that the policy could also refer to prior extraction of minerals before development in order to not sterilise them. Several respondents suggested that coal bed methane references in the policy, targets and explanation should be amended and extended to include all forms of unconventional gas. Wheldrake Parish Council specifically felt that the policy should include the extraction of methane gas. Another respondent supported and welcomed the safeguarding of coal bed methane.
- 26.4 One respondent felt that as minerals are present in the York area then the policy should allow for their development (if environmentally acceptable) if there is market demand, irrespective of an official apportionment. It was felt that as the policy stands it is not clear how a prospective developer would demonstrate need. The respondent carried on to say that York's Core Strategy could meet these requirements by designating Mineral Safeguarded Areas (MSA) or by producing a subsequent DPD showing Areas of Search for minerals.

27.0 Section 22: Infrastructure and Development Contributions

27.1 During the representation period a total of 28 comments and observations were received from organisations and individual stakeholders in relation to Infrastructure and Developer Contributions. Of these there were 21 objections, 2 supports and 5 comments. Table 29 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 29. Section 22: Infrastructure and Development Contributions		
Policy CS25: Infrastructure and Developer Contributions		
The number of respondents that consider the Core Strategy is not legally compliant:		
1		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
3		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 6	Effective: 8	Consistent with National Policy: 3

Issues Raised

- 27.2 One respondent supported this chapter in general and Yorkshire Water supported Policy CS25 and the requirement to coordinate infrastructure delivery with new development. However, many other respondents felt that Policy CS25 is not founded on a sufficiently robust and credible evidence base as it is not considered to be based on a sound Infrastructure Delivery Plan (IDP) as the IDP does not demonstrate whether a viability assessment has been undertaken or if developers/funding sources can finance infrastructure required. It is considered unreasonable by some respondents to expect developers to contribute to strategic infrastructure if likely costs are not established. It was also suggested that a site size or dwelling threshold for which contributions for off site infrastructure should be included, alongside a schedule of costs.
- 27.3 It was suggested that because the list of infrastructure where contributions may be sought is not exhaustive it may give the Council a mechanism to ask for additional contributions. As such it is considered by one respondent that the list should be more prescriptive. Several respondents suggested that specific types of infrastructure should be added to the list, such as sports facilities and the Strategic Road Network.
- 27.4 Several respondents commented that there was no evidence to demonstrate that the requirements of Policy CS25 would ensure that development remains viable and it was suggested that text be added to the policy to ensure that viability is a consideration in meeting infrastructure and development contributions. Others felt that the reasoned justification for Policy CS25 does not meet the requirements of

national policy for obligations to be fairly and reasonably related to the proposed development and reasonable in all other respects. One respondent commented that the plan includes unrealistic assumptions regarding the ability of schemes to provide affordable housing, Section 106, Community Infrastructure Levy and other regulatory and local policy demands. It is considered that this will put the plan at serious risk of being undeliverable.

- 27.5 Comments were received from a two Parish Councils that appropriate funding should be directed to Parish Councils, particularly where development takes place within village settlement boundaries. Other general comments include the need to include reference to emerging national biodiversity offsetting pilots as an alternative method to Section 106 and the need to plan for a transition to an economy that is not reliant on fossil fuels, including a city wide approach to renewable energy.

28.0 Annex A – Glossary of Terms

- 28.1 A total of 2 responses were received to Annex A - Glossary of Terms, both of which were objections. Table 30 below shows how the representations relate to legal compliance and soundness.

Table 30. Annex A: Glossary of Terms		
The number of respondents that consider the Core Strategy is <u>not</u> legally compliant:		
0		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
2		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 0	Effective: 0	Consistent with National Policy: 0

Issues Raised

- 28.2 Several objections were raised to the way words were referenced in the Core Strategy. One respondent stated that the document needed to alter the reference of 'Historic Environment' to read 'Historic, built and natural environment'. It was also suggested by another respondent that some existing terms including Historic Environment and Public Realm need further clarification. The same respondent suggested that the character areas in Figure 3.2 (York's Green Belt Character Areas) should be defined in the Glossary and they also suggested a list of other terms that should be defined.

29.0 Annex C – Bibliography

29.1 One response was received in relation to Annex C: Bibliography. This was an objection. Table 31 below shows how the representation relates to legal compliance and soundness.

Table 31. Annex C: Bibliography		
The number of respondents that consider the Core Strategy is not legally compliant:		
0		
The number of respondents that did not specify a view in relation to whether the Core Strategy was sound:		
1		
The number of respondents that consider the Core Strategy is unsound because it is not:		
Justified: 0	Effective:0	Consistent with National Policy: 0

Issues Raised

29.2 The respondent suggested that the Bibliography refers to the following documents:

- Ecosystem Services: Natural Environment White Paper 2011;
- National Ecosystem Assessment (NEA) 2011;
- Biodiversity Offsetting Pilots; and
- Making Space for Nature Report 2011.

30.0 Sustainability Appraisal

- 30.1 Six consultees submitted comments on the SA, including one comment per statutory consultation body (Natural England, English Heritage, Environment Agency).

General

- 30.2 Natural England and English Heritage both concur with the conclusions reached by the Sustainability Appraisal. Natural England consider that the document complies with the statutory requirements set out in the European Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). English Heritage also state that they generally endorse the mitigation measures which have been put forward.
- 30.3 One representation from the Environment Agency considered that the SA was legally compliant but not justified because the sustainability appraisal failed to show the thought process of the final flood risk policy analysis.
- 30.4 Natural England considered that all potential environmental effects should have been stated to allow mitigation to be put in place.

Issues Raised

- 30.5 The Environment Agency stated that the SA had not covered contamination issues in the baseline and that this topic should be included both within the baseline and SA framework (Objective EN1). English Heritage commented that the Baseline in reference to the Greenbelt had misrepresented the way in detailed Green Belt boundaries should be defined.
- 30.6 One comment received stated that the Sustainability Appraisal had not completed a comparative assessment of development in different spatial areas, although this is also acknowledged not to be evidenced elsewhere in the UK either.
- 30.7 Whilst English Heritage broadly concur with the outcomes of the SA they made specific comments to better align wording between the Heritage Topic Paper and Impact Assessment and the SA analysis and mitigation measures, particularly in respect to the 6 key elements identified in the Topic Paper. It was also noted that the SA and Heritage Impact Assessment concur that policy CS9 may have a detrimental impact on the historic environment but the fails to include a further recommendation to suggest mitigation measures. Conversely, another representation stated that the SA does not adequately demonstrate that the level of growth proposed can be accommodated without compromising the special character and historic setting of the city.
- 30.8 The Environment Agency stated that the SA analysis should be amended to recognise a link between policy CS23 and objective EN9 (Minimising Flood Risk).

Further Information

- 30.9 More information on these comments can be found in Supporting Paper 8: Sustainability Appraisal (2012).

Appendix A: Statement of Representation Procedure



City of York Local Development Framework Core Strategy

Statement of Representation Procedure

Title of document:	City of York Core Strategy Submission (Publication)		
Subject matter & area covered:	The Core Strategy sets out the planning vision for the City of York until 2031. It sets out a vision, strategic objectives, targets and policies that ensure the protection and enhancement of the City's historical and green assets whilst ensuring that carefully designed new developments are brought forward to meet local needs in line with national policy requirements. The Core Strategy covers the whole of the City of York area.		
Period for making representations:	<p>The period for making representations runs from Monday 26th September 2011 until 5pm on Monday 7th November 2011.</p> <p>Representations should be made on the prescribed representation form and returned to the address below.</p>		
Where the document can be viewed:	<p>The Core Strategy Submission (Publication) document can be viewed at the following locations:</p> <p><u>Council website</u> www.york.gov.uk/LDF/corestrategy</p> <p><u>Council Offices</u></p> <ul style="list-style-type: none"> • Guildhall Reception (Monday to Friday - 8.30am-5pm) • Library Sq Reception (Monday to Friday - 8.30am-5pm) • 9 St Leonard's Place (Monday to Friday - 8.30am-5pm) <p><u>Libraries</u></p> <table border="0" style="width: 100%;"> <tr> <td style="vertical-align: top; width: 50%;"> <p><u>York Explore Library</u> Museum Street, York Monday-Thursday: 9am-8pm Friday: 9am-6pm Saturday: 9am-5pm Sunday: 11am-4pm</p> </td> <td style="vertical-align: top; width: 50%;"> <p><u>Haxby Library</u> Monday - Tuesday: 9.30am-7.30pm Wednesday: 9.30am-5.30pm Thursday: Closed Friday: 9.30am-7.30pm Saturday: 9.30am-12.30pm</p> </td> </tr> </table> <p><u>Acomb Explore Library</u> Monday-Tuesday: 9am-9.30pm Wednesday: Closed Thursday: 9am-9.30pm Friday: 9am-5pm Saturday: 9am-2pm</p>	<p><u>York Explore Library</u> Museum Street, York Monday-Thursday: 9am-8pm Friday: 9am-6pm Saturday: 9am-5pm Sunday: 11am-4pm</p>	<p><u>Haxby Library</u> Monday - Tuesday: 9.30am-7.30pm Wednesday: 9.30am-5.30pm Thursday: Closed Friday: 9.30am-7.30pm Saturday: 9.30am-12.30pm</p>
<p><u>York Explore Library</u> Museum Street, York Monday-Thursday: 9am-8pm Friday: 9am-6pm Saturday: 9am-5pm Sunday: 11am-4pm</p>	<p><u>Haxby Library</u> Monday - Tuesday: 9.30am-7.30pm Wednesday: 9.30am-5.30pm Thursday: Closed Friday: 9.30am-7.30pm Saturday: 9.30am-12.30pm</p>		

Bishophthorpe Library

Monday: 2pm-5pm
Tuesday: Closed
Wednesday: 2pm-7.30pm
Thursday: 10am-12 noon and
2pm-5pm
Friday: 2pm-7.30pm
Saturday: 10am-12.30pm

Clifton Library

Monday: 2pm-8pm
Tuesday: 10am-12.30pm and
2pm-7.30pm
Wednesday: 2pm-5pm
Thursday: 2pm-7.30pm
Friday: 10am-12.30pm and
2pm-5pm
Saturday: 10am-12 noon

Copmanthorpe Library

Monday: 9am-5pm
Tuesday: 2pm-7.30pm
Wednesday: Closed
Thursday: 9am-12.30pm
Friday: 2pm-5pm
Saturday: 9am-12.30pm

Dringhouses Library

Monday: 2.30pm-7.30pm
Tuesday: 9.30am-12.30pm and
2.30pm-5pm
Wednesday: Closed
Thursday: 9.30am-12.30pm
and 2.30pm-5pm
Friday: 2.30pm-7.30pm
Saturday: 9.30am-12.30pm

Dunnington Library

Monday: 10am-12.30pm
Tuesday: 2pm-7.30pm
Wednesday: Closed
Thursday: 2pm-5pm
Friday: Closed
Saturday: 10am-12.30pm

Huntington Library

Monday: 2pm-7.30pm
Tuesday: 10am-12 noon and
2pm-5pm
Wednesday: Closed
Thursday: 10am-12 noon and
2pm-7.30pm
Friday: 10am-12 noon and
2pm-5pm
Saturday: 10am-12 noon

New Earswick Explore Library

Monday: 8.30am-12.30pm
Tuesday: 2pm-7pm
Wednesday: Closed
Thursday – Friday: 2pm-5pm
Saturday: 9.30am-1pm

Poppleton Library

Monday: 2pm-5pm
Tuesday: Closed
Wednesday: 10am-12.30pm
and 2pm-5pm
Thursday: 10am-12.30pm
Friday: 10am-12.30pm and
2pm-7.30pm
Saturday: 10am-12.30pm

Strensall Library

Monday: 2pm-5pm
Tuesday: 10.30am-12.30pm
and 2pm-5pm
Wednesday: Closed
Thursday: 9.30am-12.30pm
and 2pm-4pm
Friday: 2pm-5pm
Saturday: 10am-12.30pm

Tang Hall Library

Monday – Tuesday: 9.30am-
7.30pm
Wednesday: Closed
Thursday: 9.30am-5.30pm
Friday: 9.30am-7.30pm
Saturday: 9.30am-12.30pm

	<p><u>Fulford Library</u> Monday: 5.30pm-7.30pm Tuesday: 2pm-4.30pm Wednesday: Closed Thursday: 2pm-4.30pm Friday: 2pm-4.30pm Saturday: 10am-12 noon</p> <p>You can also phone 01904 551464 or email integratedstrategy@york.gov.uk to obtain a copy of the document.</p>	<p><u>Mobile Library</u> Contact Tang Hall Library on (01904) 552655 for details of times and locations for the mobile library.</p>
<p>Address for sending representations:</p>	<p>The address for making representations is as follows:</p> <p>Core Strategy Consultation City Strategy City of York Council FREEPOST (YO239) York YO1 7ZZ</p> <p>Email: integratedstrategy@york.gov.uk</p>	
<p>Method of making representations:</p>	<p>Representations may be made in writing or by way of electronic communications to the above address.</p>	
<p>Notification requests:</p>	<p>If you wish to be notified of any of the following:</p> <ul style="list-style-type: none"> • that the Core Strategy has been submitted for independent examination; • the publication of the Inspector’s report following independent examination; and • the adoption of the Core Strategy; <p>please provide your contact details to:</p> <p>Integrated Strategy Unit, City of York Council, 9 St Leonard’s Place, York, YO1 7ET</p> <p>Tel: (01904) 551464</p> <p>Email: integratedstrategy@york.gov.uk</p>	

Please contact us if you would like any information in an accessible format (for example, large print or by email) or another language.

This information can be provided in your own language.

我們也用您們的語言提供這個信息 (Cantonese)

Ta informacja może być dostarczona w twoim (Polish)
własnym języku.

Bu bilgiyi kendi dilinizde almanız mümkündür. (Turkish)

 **01904 551550**

Appendix B: Notice of Publication

Notice of Publication

The City of York Council LDF Core Strategy Submission (Publication) Notice of Publication was advertised in 'The Press' newspaper on Monday 26th September 2011. The Press newspaper provides news coverage for York, North and East Yorkshire.

ied 01904 **67 67 67**

Monday, September 26, 2011

Public Notices

Public & Legal Notices

CITY OF YORK COUNCIL

Notice of Publication of City of York Local Development Framework Core Strategy Submission (Publication)

The Core Strategy sets out the planning vision for the City of York until 2031. It sets out a vision, strategic objectives, targets and policies that ensure the protection and enhancement of the City's historical and green assets whilst ensuring that carefully designed new developments are brought forward to meet local needs in line with national policy requirements. The Core Strategy covers the whole of the City of York area.

The Core Strategy will be submitted to the Secretary of State for formal examination and is now published for public consultation. Any representations received at this stage will be forwarded to the Secretary of State as part of the examination into the document.

Copies of the Core Strategy and representation forms are available at all City of York Council libraries, at the Planning reception at 9 St Leonard's Place, Library Square reception and at the Guildhall reception (during normal opening hours). Copies are also available on the Council's website at www.york.gov.uk/LDF/corestrategy. Completed representation forms should be sent to: Core Strategy Consultation, City Strategy, City of York Council, FREEPOST (YO239), York, YO1 7ZZ, or by email to integratedstrategy@york.gov.uk by 5pm on Monday 7 November 2011.

Any representations may be accompanied by a request to be notified at a specified address (postal or electronic) of the following: that the Core Strategy has been submitted for independent examination; of the publication of the recommendations of the person appointed to carry out the examination; of the adoption of the Core Strategy.

Appendix C: Press Release

Press Release

The press release below was placed in 'The Press' newspaper within the Core Strategy Submission (Publication) consultation period. The Press newspaper provides news coverage for York, North and East Yorkshire.

Have your say on York's future

RESIDENTS in York will be able to have a final say on the future development of the city this autumn.

A public consultation on the core strategy section of City of York Council's Local Development Framework (LDF), which aims to lay out a planning vision for York, will start on Monday.

The strategy will look at how jobs can be created, future housing needs and developing an effective transport system. Once it comes into force, it will also formally establish York's Green Belt for the first time.

It also marks out a string of sites crucial to the council's aim of building about 800 new homes and creating an average of 1,000 new jobs every year.

Coun Dave Merrett, cabinet member for city strategy, said: "This is the final opportunity for York residents, businesses and institutions to comment, to sup-



port or to disagree with this ambitious but balanced 20-year plan for York's future development."

The consultation will run until November 7, after which the core strategy will be examined next year by an independent inspector who will decide whether it is appropriate for York.

For more details or to view or comment on the strategy, visit York's libraries and Explore centres, October's ward committee meetings, the council offices at the Guildhall, Library Square and St Leonard's Place, or visit york.gov.uk/LDF/core-strategy. You can also e-mail integratedstrategy@york.gov.uk or phone 01904 551464.

ONLINE MOTORS

thepress.co.uk/cars

Appendix D: Press Article

Press Article

The press article below was placed in 'The Press' newspaper on 1st October 2011. The Press newspaper provides news coverage for York, North and East Yorkshire.

FOR BREAKING NEWS ONLINE thepress.co.uk The Press SATURDAY, OCTOBER 1, 2011 15

News

Do you care about York? If so, over the next few weeks you have a unique opportunity to help shape the city's future.
STEPHEN LEWIS reports

Mapping York's future



WHAT do you think York will be like in 2031? Pretty much the same as it is now? A modern city with a new high-rise centre of gleaming office blocks behind the railway station? A booming centre of biosciences and digital technology to rival California's old silicon valley? Or a forgotten, neglected backwater living on past glories while new jobs and new developments have all moved across to Leeds?

It might be a bit of all of these. It might be none of them, but instead something completely different.

The point is that, for a short space of a few weeks up until November 7, you will have perhaps the best opportunity of your lifetime to influence the shape of things to come in York.

A key blueprint that will be used to define the way York grows and develops over the next 20 years has just been put out to consultation for the final time.

It's not the most sexy-sounding of documents, glowing in the title The City of York Local Development Framework Core Strategy Submission.

But what it aims to do is map out York's future. It will influence where new houses and offices are built; what green spaces are protected; what kind of jobs and new industries are encouraged in York; and which areas of the city must be protected at all costs.

The document sets targets of creating up to 1,000 new jobs every year for the next 20 years; and for building about 800 new homes in the city every year – an extra 16,000 by 2031. There are also targets on affordable housing and, for the first time, the document clearly sets out the full extent of green belt around York.

While this is the final draft, however, it is not yet set in stone. Once the consultation is over, all comments made will be passed to a government planning inspector, who will take them all on board, before calling a public examination in York to finalise the blueprint.

People, organisations and pressure groups who have commented may be invited to speak at that meeting.

Richard Wood, City of York Council's assistant director for strategy, planning and transport, says: "This really is your chance to help shape how York grows and develops over the next 20 years and beyond."

Peter Brown, the director of the York Civic Trust, agrees.

There hasn't been a document of this nature since the last structure plan was formalised in 1966, he says.

"What we have here is an opportunity to have something which will guide us for the next 20 or 30 years," he says.

"We live in a democratic society where people play their part. So it is absolutely crucial that the people of York have their say. This is the last opportunity to do so."

The Core Strategy Submission document runs to over 130 pages, but is surprisingly easy to follow and understand.

Essentially, it brings together a number of issues – housing, employment, development, conservation – in one document, and the council is determined to make it as easy as possible for people to study the document and make comments.

Copies are available at city libraries and Explore centres and there will be exhibitions about the document in St Sampson's Square, on October 8 and October 25. The document can also be viewed online at york.gov.uk/LDF/corestrategy

Comment forms are available online, or by phoning 01904 551464. Comments must be submitted by 5pm on November 7.

WORK IN PROGRESS: The Hungate development in York

Spotlight on highlights of city's development

DEVELOPMENT
The document identifies eight key development sites over the next 20 years:

- York Northwest (York central and the British Sugar site)
- Castle Piccadilly
- Heslington East
- Hungate
- Nestlé South
- Germany Beck
- Derwenthorpe
- Terry's

Most – though not all – are brownfield sites. City planning and strategy boss Richard Wood says: "We want to try to make maximum use of brownfield options in the urban area, with limited development in the villages."

AFFORDABLE HOUSING
The documents sets a number of targets for affordable housing, including:

- Brownfield sites with more than 15 new houses: 25 per cent must be affordable
- Greenfield sites with more than 15 houses: 35 per cent affordable
- Any development of between five and ten new houses: 20 per cent affordable.

These targets would be reviewed every year and may be open to negotiation.

RETAIL
Targets to create:

- 25,000 sq metres of new shopping space in the city centre by 2010, including at Castle Piccadilly and in The Stonebow
- 20-25,000 sq metres of new shops at York central after 2020
- A new local shopping centre on the former British Sugar/ Manor School site of up to 1,500 sq metres

ENVIRONMENT
Plans for a network of green 'corridors', and to protect open spaces and the riverside

THE PRESS



WIN*

A fabulous new Moped worth £1000 courtesy of Pedpit Ltd. York.
Pedpit.com



See The Press from Monday, October 3, 2011 to Friday, October 14, 2011 for details * Terms and conditions apply

Appendix E: Your Voice Article

Your Voice Article

Your Voice is a City of York Council publication which goes to every household in the City. The article below was placed in the autumn 2011 version of Your Voice:

your voice Email: you

Give your voice to York's plan

In the last issue of *Your Voice*, we flagged up this autumn's consultation on the city's Local Development Framework (LDF). It's about to get underway

The LDF Core Strategy outlines how the council will protect and enhance the city's special historic and natural environment, ensuring any new developments meet the city's long-term needs. These include:

Jobs

We expect to see up to 1,000 new jobs added to York's growing economy each year. This involves developing sites like those at Hungate, Terry's, York University and a new business district at York Central and, if needed, at C next to Northminster Business Park.

Housing

We've planned for about 800 new homes a year over the next 20 years to meet York's housing need, support its growing economy and increase affordable housing.

For more detail or to view and comment on the Core Strategy, please visit York libraries and Explore centres, October's ward committee meetings, 9 St Leonard's Place, Library Square and the Guildhall or go to www.york.gov.uk/LDF/corestrategy
Or, email the LDF team at integratedstrategy@york.gov.uk or call (01904) 551464.

Most will be built on urban sites such as the former Nestlé and Terry's factories while areas A and B will only be considered if we run out of suitable sites.

Environment

York's historic environment will be maintained and enhanced with public green spaces and wildlife

habitats conserved and improved. A green belt will be established and new developments must meet the highest sustainable and architectural standards.

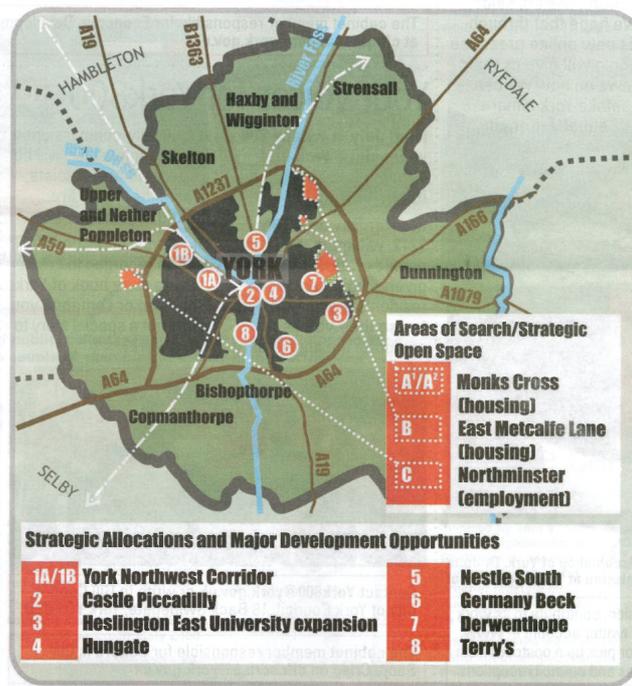
Transport

Alternatives to private car use like walking and cycling will be encouraged alongside

improving public transport in existing and new developments.

What happens next?

The consultation runs from 26 September to 7 November. An independent inspector will consider all comments and decide whether the plan is appropriate for York.



This newsletter for residents from City of York Council can be provided in your own language

约克市政务会面向居民的这份通讯有您的语言版本可提供。(Cantonese)

Bu, bölge sakinler için City of York Belediyesi'nin haber bültenikendi dilinizde sag tanabilir (Turkish)

Niniejszy biuletyn Rady Miasta York dla mieszkańców może być przygotowany w Twoim języku (Polish)

If you or someone you know would like a large print, or listen to a recorded version and an audiofile at www.york.gov

This is *Your Voice*. Please tell us what you think: are we giving you the new publication: are we giving you the new would you change – and how? We want your views. Please write to us at: **Your Council, Communications and Media, Guildhall Square, York YO1 1DD**
Or email us at your.voice@york.gov

Appendix F: List of Consultation Events and Meetings

List of Consultation Events and Meetings

Consultation on the Core Strategy Submission (Publication) document ran from Monday 26th September to Monday 7th November 2011. In order to maximise the consultation on the document, the Council arranged a comprehensive series of events and meetings, as follows:

Ward Committees

The Ward Committee cycle ran from 4th to 24th October 2011. Exhibition boards highlighting the consultation were provided for the drop-in surgery at the beginning of each meeting. Officers also attended the meetings / surgeries on request. The following is a list of Ward Committees where consultation took place on the Core Strategy:

<i>Date</i>	<i>Ward Committee</i>	<i>How presented</i>
4/10/11	Hull Road Ward Committee	Display Boards
5/10/11	Haxby and Wigginton Ward Committee	Display Boards and Surgery
10/10/11	Strensall Ward Committee	Display Boards, Surgery and Presentation
10/10/11	Heslington and Fulford Ward Committee	Display Boards
11/10/11	Holgate Ward Committee	Display Boards and Surgery
11/10/11	Osbalwick Ward Committee	Display Boards, Surgery and Presentation
12/10/11	Guildhall Ward Committee	Display Boards and Surgery
12/10/11	Heworth Ward Committee	Display Boards
12/10/11	Westfield Ward Committee	Display Boards
13/10/11	Huntington & Earswick Ward Committee	Display Boards
17/10/11	Micklegate Ward Committee	Display Boards and Surgery
17/10/11	Skelton, Rawcliffe and Clifton Without Ward Committee	Display Boards, Surgery and Presentation
18/10/11	Clifton Ward Committee	Display Posters
18/10/11	Fishergate Ward Committee	Display Boards

19/10/11	Dringhouses and Woodthorpe Ward Committee	Display Posters and Surgery
19/10/11	Bishopthorpe & Wheldrake Ward Committee	Display Posters
19/10/11	Rural West York Ward Committee	Display Boards
24/10/11	Acomb Ward Committee	Display Boards

City Centre Exhibition

The Council ran two exhibitions in the Council's mobile exhibition unit in St Sampson's Square in the City Centre, between 10am and 4pm, on Saturday 8th October and Tuesday 25th October 2011. The exhibitions were manned by Council officers, who answered questions and queries from members of the public. The Saturday and Tuesday dates were specifically chosen, to maximise potential coverage.

Meetings with Partnership Groups, Interest Groups and Organisations

Officers also attended a number of other meetings with Partnership Groups, Interest Groups and Organisations, as follows:

<i>Date</i>	<i>Partnership Group / Interest Group / Organisation</i>
21/9/11	Parish Council Liaison Group Meeting (NB: This was held just before the Formal Consultation began)
4/10/11	Conservation Area Advisory Panel
10/10/11	Environment Forum
12/10/11	York Business Forum
12/10/11	Youth Council Meeting
17/10/11	Staff Drop-In Session
24/10/11	Heworth Without Drop-In Session
27/10/11	York Open Planning Forum
31/10/11	Meeting with pupils at Carr Junior School (who wanted to submit a representation)

Meetings with Specific Consultees

In order to maximise understanding of the approach in the Core Strategy, the Council contacted key Specific Consultees and invited them to meetings with officers to discuss the approach and answer any questions before the Specific Consultees submitted their representations. The following meetings were arranged:

<i>Date</i>	<i>Specific Consultee</i>
13/10/11	Meeting with the Environment Agency
19/10/11	Meeting with Neighbouring Authorities
25/10/11	Meeting with English Heritage
1/11/11	Meeting with Highways Agency

The following Specific Consultees and Partnership Boards were offered meetings to discuss the Core Strategy, but either declined the offer or their formal meeting took place outside the Consultation period (26th September to 7th November 2011):

- Economic Development Partnership;
- Inclusive York Forum;
- York Property Forum;
- Retail Forum;
- Natural England;
- Safer York Partnership;
- York Civic Trust;
- Sport England.

Appendix G: List of Specific Consultees

List of Specific Bodies Consulted for Core Strategy Submission (including their LDF database reference number)

- 60 Acaster Malbis Parish Council
- 26 Acaster Selby & Appleton Roebuck Parish Council
- 2893 Appleton Roebuck Parish Council
- 61 Askham Bryan Parish Council
- 62 Askham Richard Parish Council
- 23 Bilborough Parish Council
- 63 Bishopthorpe Parish Council
- 226 BT Group plc
- 2680 BT Openreach
- 39 Catton Parish Council
- 2679 CE Electric (NEDL)
- 35 Claxton & Sandhutton Parish Council
- 64 Clifton Without Parish Council
- 22 Colton Parish Council
- 457 Copmanthorpe Parish Council
- 65 Copmanthorpe Parish Council
- 406 DE Operations North (Catterick Office)
- 405 DEFRA
- 66 Deighton Parish Council
- 415 Department for Constitutional Affairs
- 67 Dunnington Parish Council
- 68 Earswick Parish Council
- 42 East Cottigwith Parish Council
- 17 East Riding of Yorkshire Council
- 69 Elvington Parish Council
- 2435 English Heritage Yorkshire and the Humber Region
- 242 English Heritage Yorkshire and the Humber Region
- 5 Environment Agency
- 2176 Environment Agency
- 25 Escrick Parish Council
- 33 Flaxton Parish Council
- 70 Fulford Parish Council
- 37 Gate Helmsley & Upper Helmsley Parish Council
- 14 Hambleton District Council
- 15 Harrogate Borough Council
- 34 Harton Parish Council
- 71 Haxby Town Council
- 56 Heslington Parish Council
- 72 Hessay Parish Council
- 73 Heworth Without Parish Council
- 2434 Highways Agency
- 6 Highways Agency
- 74 Holtby Parish Council
- 2678 Homes and Communities Agency
- 19 Huby Parish Council
- 75 Huntington Parish Council
- 76 Kexby Parish Council
- 12 Kyle & Upper Ouse Internal Drainage Board
- 32 Lillings Ambo Parish Council
- 2859 Local Government Yorkshire and Humber
- 29 Long Marston Parish Council
- 28 Moor Monkton Parish Council
- 2178 Murton Parish Council
- 467 Murton Parish Council
- 77 Murton Parish Council
- 78 Naburn Parish Council
- 2860 Natural England
- 4 Natural England Consultation Service

79 Nether Poppleton Parish Council
214 Network Rail
2149 Network Rail
80 New Earswick Parish Council
40 Newton on Derwent Parish Council
59 North Yorkshire & York PCT
18 North Yorkshire County Council
218 Northern Gas Networks
417 Office of Government Commerce
43 Osbaldwick Parish Council
21 Overton Parish Council
411 Powergen Retail Ltd
81 Rawcliffe Parish Council
82 Rufforth with Knapton Parish Council
13 Ryedale District Council
16 Selby District Council
31 Sheriff Hutton Parish Council
20 Shipton Parish Council
83 Skelton Parish Council
38 Stamford Bridge Parish Council
27 Stillingfleet Parish Council
84 Stockton on the Forest Parish Council
85 Strensall with Towthorpe Parish Council
2892 Sutton on the Forest Parish Council
41 Sutton upon Derwent Parish Council
30 Sutton-on-the-Forest Parish Council
397 The Coal Authority Planning & Local Authority Liaison Department
2861 The Planning Bureau
24 Thorganby Parish Council
86 Upper Poppleton Parish Council
36 Warthill Parish Council
87 Wheldrake Parish Council
88 Wigginton Parish Council
2 York & North Yorkshire Partnership Unit
199 York Consortium of Drainage Boards
275 York Health Services NHS Acute Trust
273 Yorkshire Ambulance Service NHS Trust
2315 Yorkshire Forward (York)
3 Yorkshire Forward (York)
320 Yorkshire Water - Land Property & Planning

Appendix H: Summary of Consultation Responses

General

Paragraph etc	Supporting Comments	Ref.	Name
General	Support general approach of CS.	13/8891	Ryedale District Council
	Supports overall plan, concepts and vision.	173/8609	Without Walls Partnership
	Support – covers all relevant points.	1525/8376	Mr E A Courtney
	Overarching vision and objectives welcomed.	2537/9653	D; L Lancaster; Philiskirk & Sons Ltd; Burneston Family
	Support.	2885/8748	Mr D Green

General

Paragraph etc	Comments and Objections	Ref.	Name
General	'Overarching framework' should be linked through majority of 'Policy Links'. Paragraph 1.3 page 4 proposed Green Infrastructure SPD has not been included in list of SPDs to be produced. Suggest that this 'overarching framework' should be integrated into all development. (Comment)	4/8888	Natural England Consultation Service
	Seems to contain enough flexibility to enable City to accommodate its housing needs within current plan period. Important to continue to work together to implement and refine mechanisms throughout lifetime of plan. Whilst document is likely to enable City to accommodate its full housing needs throughout plan period, suggested that consideration might be given during preparation of Allocations DPD to identification of 'safeguarded' areas of land within proposed Green Belt for future housing development. (Comment)	18/9499	North Yorkshire County Council
	No basic summary of statistics provided. No statistics provided of how much green belt land has been lost since 1996. No environmental capacity study has been carried out. Alternatives to peripheral growth of main urban area have not been fully considered. (Grounds Not Legally Compliant; Not Effective)	65/8469 65/8470	Copmanthorpe Parish Council
	CS should have as its core objective fostering of economic growth and job creation. Without economic growth, local economy will be unable to generate wealth required to realise social and environmental objectives set out in LDF Vision for York. CS must have flexibility to respond quickly to changes in economic circumstances. Therefore Flexibility should be a key attribute running through policies and objectives of plan. (Comment)	196/9675	York & North Yorkshire Chamber of Commerce
	Page 59 paragraph 7.2 – World Heritage Bid was unsuccessful in 2011 and is being revised and although will still include archaeology it will be wider than that. Similarly mention of World Heritage Bid in Heritage Topic Paper. Wording may need changing. Page 78 paragraph 11.9 – Hospital Car Park has already been built. (Comment)	203/9535	Mrs J Hopton
	Existing cultural facilities (apart from NRM) do not appear in any policy for their protection and enhancement. Therefore the policies are inadequate and the document ineffective. (Grounds Not Effective)	324/8667	The Theatres Trust
	Evidence base material needs to be assembled to deliver new sports and recreation facilities funded by developers, inline with the objectives of PPG17. Have highlighted gaps in evidence base by way of a playing pitch strategy but also needed is a built facilities study. Would be likely to object to further DPDs if these do not make up evidence base. (Comment)	398/9005	Sport England

General Continued

Paragraph etc	Comments and Objections	Ref.	Name
General Continued	Unlikely that CS will be in place before final version of NPPF is published. CS fails to reflect positive and aspirational aspects of draft NPPF. Does not adequately identify role, which York has, in economic development, at a sub regional level. York's role as a sub regional centre is of unusual importance given low density of cities in this part of country, which could be developed as an alternative to York. (Grounds Not Consistent with National Policy)	606/9566	Jennifer Hubbard Planning Consultant
	People understand Historic and built, as the special buildings - therefore should read as York's Special Historic, Built and Natural Environment throughout the document. Natural environment is also our heritage. Need to refer to the new 'Natural Environment White Paper 2011', 'Biodiversity Offsetting Pilots' the 'National Ecosystem Assessment (NEA)', which states values and the 'Making Space for Nature Report' in the CS. (Grounds Not Effective)	1656/8679	Mr B Otley
	Would like to understand timetable for delivery of SPDs and options the Council will consider should they not progress. (Comment)	2434/8488	Highways Agency
	Strategy whose purpose is to set out a vision, strategic objectives targets and policies to guide where development goes in a way that will ensure the protection ... "does not seem to have particular vision, objectives, targets or policies e.g. housing quota, whose 800 figure is seen as more of an estimation than a min/max limit based on private development speculation; Castle Piccadilly site and others, which have been sought for development over many years but appear to be unfeasible without better development strategies; and the Heslington East swimming pool (which is touched on briefly and isn't part of a grand vision for York). (Grounds Not Justified)	2933/8778	Mr J Rose
	King's Pool Nature Reserve should be included within the CS's Habitat Regulation Assessment. (Grounds Not Legally Compliant)	2938/8795	Mrs S Wherrett
	CS needs an index using page numbers and paragraph numbers as appropriate. Would be helpful to give each part of the document a number. E.g. Part 1: About the Plan; Part 2: Background and Vision; etc (Object No Grounds Stated) On pages 29, 35, 40 and 46 for example, three separate names are used that are similar in general meaning but which refer to different areas. They are: York Central, York City Centre, and Heart of the City. For the general reader this is confusing. Revise nomenclature to make these names more distinctive. (Comment)	2946/8854 2946/8870	The Garden & Landscape Heritage Trust

About the Plan

Paragraph etc	Comments and Objections	Ref.	Name
What is the Local Development Framework? Para i)	Description of LDF as a blueprint for economic, social and environmental future of York which will provide framework for implementing Council's aims and objectives that affect use of land and buildings is not in conformity with national planning policy, as it does not mention sustainable development and role CS has in promoting objectives of sustainable development as defined in either PPS1 or draft NPPF. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2959/9343 2959/9344 2959/9345 2959/9346	William Birch & Sons & Other Clients
What is the Core Strategy? Para ii)	Description of CS refers to development being "brought forward to meet local needs". This statement is misleading, as it does not recognise important role York plays within Region. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2959/9347 2959/9348 2959/9349 2959/9350	William Birch & Sons & Other Clients

Key Diagram

Paragraph etc	Comments and Objections	Ref.	Name
	Description of Germany Beck as part of urban area of Sub Regional City not justified because site lies in open countryside in draft green belt where inner boundaries have not yet been defined and development has not commenced. Fordlands Road and Heslington Village are not marked as small villages under settlement hierarchy. (Grounds Not Justified; Not Effective)	70/8499 70/8500	Fulford Parish Council
	Residual Green Belt identified on Key Diagram is unsupported by evidence of any need for Green Belt designation to extend across uncoloured areas on Figure 3.2. (Grounds Not Justified)	606/9567	Jennifer Hubbard Planning Consultant
	Whilst Harewood Whin is identified as a waste and recycling site, it appears to be still within Green Belt. Seek site's removal from Green Belt and incorporated into Site Allocations documents.	608/8676	Yorwaste Ltd
	The area of Site B is vague. Boundaries are imprecise and will lead to arguments if the site is considered in due course. Further there is no discussion on how it can be serviced by roads. One map that has been circulated involves roundabouts from the A64 and consequentially more damage to the greenfield area. Does not appear that all implications have been thought through. Should be some acknowledgement that boundaries need to be set and what overall damage to greenfield area and consequences to Murton will be.	2178/8696	Murton Parish Council
	Suggest that generality of Green Belt are indicative only and do not reflect inner Green Belt boundary. In particular suggest that Green Belt boundary in vicinity of Knapton should follow A1237 ORR with general extent of land inside ORR designated as an "area of Search". (Grounds Not Justified; Not Consistent with National Policy)	2537/9623 2537/9624	Lancaster & Burneston Family
	Pre-empted location of "strategic open space" which may in fact not be promoted by landowners with same aims. Need to remove locations identified. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9135 2689/9136 2689/9137 2689/9138	Monks Cross North Consortium
	This does not show extent of mineral resource in City of York. (Grounds Not Consistent with National Policy)	2939/8798	Mineral Products Association
	Use of word strategic in "Strategic Open Space" is confusing. Suggest "Reserved Open Space" or similar. Term Sub Regional City is not clear and sounds rather demeaning and negative. Suggests "Core of the City" which could then be divided into "Inner Core" (City Centre) and "Outer Core" (rest of main built settlement). Beyond core is Green Belt (rural areas) with islands of development in form of Large Villages, Villages, and Small Villages.	2946/8858	The Garden and Landscape Heritage Trust

Key Diagram Continued

Paragraph etc	Comments and Objections	Ref.	Name
	Council should recognise special character of Heslington Village in CS and include it in Key Diagram. (Grounds Not Justified; Not Effective)	2947/8881 2947/8882	Mrs L Hatton
	Will fail to deliver sufficient supply of land to meet City's housing needs and proposed new housing numbers over plan period is too low. Reliance on small windfall sites of less than 0.2ha and conversion of large properties coming throughout plan period is contrary to PPS3. Even if housing numbers are accepted, as well as all of identified areas of supply, including small windfall sites, this leaves a supply shortfall of 3,733 dwellings. Therefore Areas of Search for urban extensions will be a critically important element of land supply. Inappropriate, and again contrary to national guidance, to plan for this shortfall to be met through as yet unidentified sites in appropriate locations and it follows that broad Areas of Search should be extended to properly plan for City's future housing land requirements. Area of Search A1 should be extended both southwards and westwards to incorporate land at the junction of New Lane and Malton Road, Huntington. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2950/9185 2950/9186 2950/9187	Taylor Wimpey UK Ltd
	Object that land at Moor Lane, Dringhouses is shown as being within Green Belt and should be amended to exclude it. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9270 2953/9271 2953/9272	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
	Location of University marked as Heslington East only. Should be revised to cover both campuses. Hull York Medical School is on Heslington West not East. (Comment)	2958/9336	University of York

Chapter 1 Background

Paragraph etc	Supporting Comments	Ref.	Name
Issues, Challenges and Opportunities			
York's Unique Built Environment Paragraph 1.17 to 1.20	Provides a good overview of historic environment and challenges.	242/8630	English Heritage Yorkshire and the Humber Region
Climate Change Paragraph 1.21 and 1.22	Welcome Climate Change Action Plan and Framework with targets for reduction in CO2 emissions. Also commend targets for reduction of City's ecological footprint.	2898/9156	York Environment Forum
Employment Paragraph 1.26	Welcomes recognition that economic success must be delivered in a way which respects City's unique character.	242/8631	English Heritage Yorkshire and the Humber Region
Housing Paragraph 1.28 and 1.29	Support acknowledgement that a key challenge is to deliver sufficient housing of right type and mix to meet City's needs	2953/9220	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Green Infrastructure Paragraph 1.36	Supports reference to sport within Green Infrastructure.	398/8991	Sport England

Section 1: Background

Paragraph etc	Comments and Objections	Ref.	Name
General	Should be a published database showing since 1991 year on year changes in York for households, dwellings and jobs. (Grounds Not Justified)	55/8465	CPRE (York and Selby District)
	Green belt land and greenfield sites exist in Strensall/Towthorpe and clarification should be provided between these two descriptive terms.	85/8580	Strensall with Towthorpe Parish Council
	Does not refer to place of City within region yet draft NPPF requires local planning authorities to work together to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Nor does CS refer to City's membership of York and North Yorkshire Local Enterprise Partnership or the work of the Leeds City Region LEP. (Comment)	165/8916	Home Builders Federation
	On basis that Council is seeking to not deliver RSS housing requirement and has effectively halved employment requirement, important that views and strategies of adjoining authorities are taken on board. No evidence is provided to demonstrate that this has been undertaken. Of particular concern on basis that Council suggests that principal cross boundary relationships are with Selby DC to south, City of Leeds to west and East Riding to east. Given that two of these authorities are currently at different stages in preparation of their LDF and pursuing different strategies it is important to understand the consequences and cumulative effects of those strategies. (Grounds Not Consistent with National Policy)	2537/9614	Lancaster & Burneston Family
	Given changes in transport, building, heating, energy generation and resource use targets for reduction in CO2 emissions require, question whether other aspects of CS, notably target for housing and emphasis on growth have taken this into account.	2898/9157	York Environment Forum
	Business Accommodation Questionnaire Responses – see Representation (Comment)	2971/9655	York Professionals
Policy Influences			
National Para 1.02 & Figure 1.1	Paragraph is out of date. Should be updated with reference to Planning for Growth Agenda. Figure 1.1 should be deleted and instead principles and priorities should be listed that have been drawn from Planning for Growth Agenda and NPPF. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2959/9351 2959/9352 2959/9353 2959/9354	William Birch & Sons & Other Clients
Local Figure 1.2	Vision from 'York – A City Making History' may have been modified since by partnerships on the Without Walls Board. (Comment)	2898/9154	York Environment Forum
Local Para 1.04	York's Sustainable Communities Strategy has been renamed 'The Strategy for York'. This needs to be corrected wherever Sustainable Communities Strategy is referenced. (Comment)	2898/9153	York Environment Forum

Section 1: Background Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy Influences Continued			
Local Para 1.05	"Balance between physical growth and environmental sustainability" - shouldn't be a balance. Growth should be possible while improving sustainability - by looking at current issues and ensuring new development improves things. Examples could be incorporating proper infrastructure into new development - transport systems, energy supplies, etc.	551/8362	Constructive Individuals
	Strategic ambitions wording may have been modified since by partnerships on the Without Walls Board. (Comment)	2898/9155	York Environment Forum
Local Para 1.08	To read "and indeed a more <u>greener</u> beautiful city".	1656/8680	Mr B Otley
Local Para 1.09	C02 reductions from transport will require drastic action, which may be initially unpopular. Need to set out a clear plan with solid reasoning, and get the details right - this will include going further in looking at improved public transport.	551/8363	Constructive Individuals
Issues, Challenges and Opportunities			
Geography Para 1.15	Paragraph fails to recognise that role of Green Belt has been established too, which is to protect setting and character of historic city. Fails to recognise that once Yorkshire and Humber Plan has been revoked there is a question over whether general extent of Green Belt will continue to exist given statutory basis for establishing designation will disappear. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2959/9359 2959/9360 2959/9361 2959/9362	William Birch & Sons & Other Clients
Population Para 1.16	Forecast of population growth and therefore a need for additional land appear to be predicated on employment forecasts based on further net in-migration not actually needed in York's successful economy. (Grounds Not Justified; Not Effective; Not Legally Compliant)	65/8480 65/8481 65/8482	Copmanthorpe Parish Council
	Sections on Population and Housing need to be combined in order to present a more informed understanding of continued population growth and its impact upon household formation. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9068 2689/9069 2689/9070 2689/9071	Monks Cross North Consortium
	Not clear if population referred to is for 2011, or whether this reflects population from an earlier stage of consultation process. Barton Wilmore's York City Wide Housing Needs Assessment, states that population for York in 2011 is 202,800 and estimates that population would increase to 242,700 by 2031. Recommend 2011 population for York is amended to 202,800 and to 242,700 for 2031. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9217 2953/9218 2953/9219	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
	First sentence not justified in context of York's population growth in recent years and forecast in CS. LDF is not responding to needs of residents in encouraging large inflows of international inward migration into City. (Grounds Not Justified)	2965/9485	Osbalwick Parish Council & Meadlands Area Residents Association

Section 1: Background Continued

Paragraph etc	Comments and Objections	Ref.	Name
Issues, Challenges and Opportunities Continued			
York's Unique Built Environment Para 1.17	Paragraph focused entirely on city centre. Should be amended to include contribution of historic villages to historic character of York. (Grounds Not Justified; Not Effective)	70/8492 70/8493	Fulford Parish Council
Climate Change Para 1.21	Section is out of step with direction of national planning policy. Places too great an emphasis on environmental objectives without these being properly justified at the expense of economic and social needs of City.	165/8902	Home Builders Federation
Climate Change Paragraph 1.21 and 1.22	Should be simplified and brought into line with national and regional policy. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9064 2689/9065 2689/9066 2689/9067	Monks Cross North Consortium
	Contents of these paragraphs seem a bit mixed up. There are two main topics: (1) Reduction of carbon emissions, and (2) Ecological footprint. Suggest para 1.21 should deal with one, and para 1.22 with the other.	2946/8859	The Garden and Landscape Heritage Trust
Climate Change Para 1.22	Do not accept simplistic theory and calculation behind the 'carbon footprint'. It ignores other side of equation; namely reason why people consume resources.	165/8903	Home Builders Federation
Air Quality Para 1.23	Need to clarify how move to electric cars will affect transport arguments and proposals for improved air quality. One argument says "they don't produce any in-street pollution so we'll get improved air quality without reducing travel miles" - could end up with cleaner air but gridlock. Very clear arguments need to be developed.	551/8364	Constructive Individuals
	Having public transport infrastructure to support development is vital. Encouraging modal shift to sustainable transport will provide some but not all of answers. Favours a fundamental re-imagining of York's transport system so that ultimately city's core is car-free. (Comment)	2898/9664	York Environment Forum
Employment Para 1.26	Fails to mention important role York plays within York and North Yorkshire Sub Region. Paragraph should be amended to refer to role York has in relation to North Yorkshire. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2959/9363 2959/9364 2959/9365 2959/9366	William Birch & Sons & Other Clients
Housing	Sections on Population and Housing need to be combined in order to present a more informed understanding of continued population growth and its impact upon household formation. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/8934 2689/9512 2689/9513 2689/9656	Monks Cross North Consortium

Section 1: Background Continued

Paragraph etc	Comments and Objections	Ref.	Name
Issues, Challenges and Opportunities Continued			
Housing Para 1.28	Comment that mean income of newly forming households will place purchase of homes beyond their reach assumes that house prices will remain at current levels and will not adjust to reflect new market realities to reconnect with incomes. Council will need to have regard to this in its viability modelling lest it is relying on a return to market conditions experienced in 2007 to make viability of its affordable housing and CIL work. Do not think such conditions are likely to return anytime soon. (Comment)	165/8904	Home Builders Federation
	SHMA is now four years old, based on analysis, which was undertaken in 2007, before major change in housing market and wider economy. Council should take into consideration findings of up to date SHMA in further proposed changes. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9221 2953/9222 2953/9223	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Retail and Leisure Para 1.35	States that smaller centres in York have been affected by Monks Cross. The Trustees previously made representations on this point demonstrating that there is no evidence to substantiate this claim. Recommend paragraph is deleted. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	370/8986 370/8987 370/8988 370/8989	Monks Cross Shopping Park Trust
	Out of town retail hits the smaller local centres as well as the city centre. Parades such as Bishopthorpe Road provide more than just local shopping - they are a focus for local communities and they add value to housing. But they are under threat. Should be seeking to develop local centres like these to promote walking/cycling, and shouldn't be encouraging growth of out-of-town retail which takes trade away from local shops.	551/8365	Constructive Individuals
	Is there something missing from second sentence? Concerns about threats posed by proposed retail expansion of Monk's Cross in particular, which would also result in an increase in emissions (from travel and from buildings). Support findings of Retail Study and trust that CS will embed these, thus limiting any further out-of-town development in retail sector. (Comment)	2898/9159	York Environment Forum
Green Infrastructure Para 1.36	To read "York's green infrastructure <u>add values</u> includes a network"	1656/8681	Mr B Otley
Green Infrastructure Para 1.39	Welcome reference to Open Space, Sport and Recreation Study (2008). Expect CS policies and further site-specific policies to reflect this. However is not a full playing pitch strategy and should not be substituted for such. (Comment)	398/8992	Sport England
Community Facilities	Heading "Community Facilities" should be "Built Community Facilities". Open space is also a facility.	2946/8860	The Garden and Landscape Heritage Trust

Section 1: Background Continued

Paragraph etc	Comments and Objections	Ref.	Name
Issues, Challenges and Opportunities Continued			
Community Facilities Para 1.46	Note reference to Active York's <i>emerging</i> Sports and Active Leisure Strategy, however has not been consulted recently on such a study. Question robustness of evidence base and whether this is a 'shopping list' rather than a sound strategy using Sport England tools for strategic sports planning. (Grounds Not Justified)	398/8993	Sport England
	Appears to have been inserted to facilitate building of proposed new community stadium at Monk's Cross. Need for strategic planning through LDF to deliver city-wide and large-scale sports and community leisure facilities should indeed adhere to strategic planning elements embedded in LDF and not pressures from developers or other influential sources, especially with regard to sustainability of any new stadium (which, arguably, is not a 'community' stadium if it cannot be accessed easily on foot or by public transport). (Comment)	2898/9161	York Environment Forum
Waste and Minerals	Waste and Minerals are separate issues and should not be brought together.	2946/8861	The Garden & Landscape Heritage Trust

Chapter 2 Vision

Paragraph etc	Supporting Comments	Ref.	Name
General	Support vision and strategic objectives.	55/8457	CPRE (York and Selby District)
	Support especially that relating to preservation and enhancement of heritage assets.	242/8632	English Heritage Yorkshire and the Humber Region
	Welcome reference to sport within vision, in particular new swimming pool at new University Sports Park.	398/8994	Sport England
	Support.	2913/8388	Ms J Pickard
LDF Vision for York			
York's Special Historic and Built Environment	Support and particularly endorse that:- heritage assets are an essential component of continued economic success; identification of key elements contributing to special historic character; recognition of primary purpose of Green Belt.	242/8633	English Heritage Yorkshire and the Humber Region
A Prosperous and Thriving Economy	Commends commitment to promotion of low carbon economy.	2898/9163	York Environment Forum
A Leading Environmentally Friendly City	Support particularly intention to strike balance between physical growth and environmental sustainability and ensure that environmental consequences are adequately understood and managed.	242/8635	English Heritage Yorkshire and the Humber Region
	Fully supports.	2898/9165	York Environment Forum
	Support need to create permanent Green Belt that will endure until at least 2031.	2953/9230	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)

Section 2: Vision

Paragraph etc	Comments and Objections	Ref.	Name
General	Key element of views of Minster missing and should be added. Whilst York has a role in the region, for it to be a key driver is not compatible with York as a compact historic city. (Grounds Not Justified; Not Effective)	70/8494 70/8495	Fulford Parish Council
	No specific objections or concern relating to any of these overarching principles and objectives, however how these objectives are translated into spatial principles, and specific sections of document, remains confusing. (Comment)	331/8949	Taylor Wimpey (UK) Ltd
	<p>Add new paragraph to read, “Community and COYC should understand and appreciate economic values and cost savings from the natural environment and ecosystem services. They are multiple, cross cutting benefits which when added together, such connectivity stretches beyond local authority boundaries and relate to most sections subjects in the core strategy.</p> <p>Ecosystem services examples below:</p> <ul style="list-style-type: none"> •Regulating: mitigating the impact of climate change, air quality emissions, flood control, sequestration of carbon, pollination to produce food. •Provide cultural services: people benefit from contact of ecosystems, aesthetic, spiritual (visit to parks and housing locations) recreational - mental and physical health and tourism. •Habitat or supporting services: these underpin almost all other services. Ecosystems provide living spaces for plants (habitat species) or animals: they also maintain a delivery of plants and animals (maintenance of genetic species). •Provisioning services: products obtained - food production, fresh water supply, genetic resources and raw materials (wood for bio fuels). <p>It is necessary that the ecosystem services are embedded into the LDF, policy making and planning decisions and role out in training for the new skills required, also the councillors and community to understand and appreciate the values of the natural environment and its many cost savings. 'Reconnect people and nature'.</p>	1656/8682	Mr B Otley
	While support intention to take 'lead role' at centre of wide functional sub-area stretching beyond its immediate boundaries, nowhere is aim for York to be the focus for growth for these adjoining more rural areas. Appears to relate largely to preserving historic and environmental qualities of York as a priority with no reference to becoming a sub-regional focus for jobs and housing. (Comment)	2689/9072	Monks Cross North Consortium

Section 2: Vision Continued

Paragraph etc	Comments and Objections	Ref.	Name
General Continued	For York to become ‘a city making history’ must acknowledge that aspiration to become a world-class centre needs to be set within a global context not just of opportunity but also of vulnerability. Economic recession; climate change; impact of worldwide population increase on resources, food and water; and need to adapt to a world post-oil have not been recognised or explored in CS, despite fact that one of its core ambitions is to be ‘a leading environmentally friendly city’.	2898/9149	York Environment Forum
	Whilst vision identifies useful overarching issues and objectives, text is unduly long and not necessary. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9224 2953/9225 2953/9226	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Introduction Figure 2.1	Figure is missing a reference to Government’s Planning for Growth Agenda. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2959/9367 2959/9368 2959/9369 2959/9370	William Birch & Sons & Other Clients
LDF Vision for York			
General	Unclear how aspirations relate to Government’s growth agenda. Should be rewritten to make sure it is aspirational in terms of growth, and so it places the right emphasis on way in which three pillars of sustainable development are prioritised and considered. Word “preserved” should be replaced with “protected”. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2959/9371 2959/9372 2959/9373 2959/9374	William Birch & Sons & Other Clients
York’s Special Historic and Built Environment	Include the six characteristics that the Heritage Topic Paper identifies as contributing to the special character and setting of York.	242/8634	English Heritage Yorkshire and the Humber Region
	Term “Special Historic and Built Environment” should be changed to “Special Environmental and Archaeological Heritage” because it includes other heritage assets such as green infrastructure.	2946/8862	The Garden & Landscape Heritage Trust
	2 nd paragraph, end sentence, is factually incorrect and is not in accordance with Yorkshire and Humber Plan. The word “historic” should be inserted before “setting” and “character”. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2959/9375 2959/9376 2959/9377 2959/9378	William Birch & Sons & Other Clients

Section 2: Vision Continued

Paragraph etc	Comments and Objections	Ref.	Name
LDF Vision for York Continued			
Building Confident, Creative & Inclusive Communities	Flexibility needs to be provided to give Council means to release land to ensure that it has a continuous 5-year supply of deliverable housing sites in accordance with PPS3. This includes potential to release Green Belt land at any point required over course of entire LDF period. Flexibility must be built into CS to ensure required level of land can be provided to meet District's realistic future housing needs. Object to strategy of extensions to main built up areas to be brought forward for development to ensure supply in later part of plan period. Final sentence of third paragraph should be amended as follows: "To ensure a continuous rolling supply of housing throughout the plan period sustainable extensions to the main built up area will be identified and brought forward." (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9227 2953/9228 2953/9229	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
A Prosperous and Thriving Economy	Shopping: - Department stores will not increase the attractiveness of York as a destination if the same ones exist in "competing" retail centres - shouldn't we be fostering retail which makes York unique? e.g. small-scale quarters such as Stonegate/Swinegate, developing and promoting events like the Food Festival.	551/8366	Constructive Individuals
	Stated commitment to sequential development must not be dropped because a developer offers financial incentives to build new retail units out of town. (Comment)	2898/9164	York Environment Forum
A Leading Environmentally Friendly City	Given the primary purpose of the York Green Belt, move the final paragraph on page 18 on the Green Belt to the Section on York's Special Historic and Built Environment. If end-date of CS is 2031, it follows that life of Green Belt should be longer than this. However, the "permanence" being suggested is considerably less than envisaged in national policy guidance. Should therefore delete the specific end-date for the period within which the Green Belt is to remain unchanged. in last paragraph on page 18, line 1.	242/8636	English Heritage Yorkshire and the Humber Region
	LDF doesn't need to "ensure that future development is designed and constructed in a sustainable way" - Building Regulations already do that - what LDF can do is ensure location and types of development are appropriate and sustainable, and/or look at local initiatives which would contribute to sustainability - local power schemes etc.	551/8367	Constructive Individuals
	Suggest that, 'being a city leading the way in sustainability' would express ambitions more accurately. Concerned that phrase, "striking an appropriate balance between physical growth and environmental sustainability" is loose and could be interpreted whichever way a developer chose to argue was 'appropriate'. Environmental sustainability should not be seen as a weighting system or a trade-off. Current targets for renewable energy generation from new developments are insufficiently ambitious.	2898/9162	York Environment Forum

Section 2: Vision Continued

Paragraph etc	Comments and Objections	Ref.	Name
LDF Vision for York Continued			
A Leading Environmentally Friendly City Continued	Last paragraph on page 18 refers to creating a Green Belt for York that “will endure until at least 2031.” This is not in accordance with PPG2 and draft NPPF. Paragraph should be amended to refer to Green Belt enduring beyond 2031. Also needs to be amended as it introduces an interpretation of special character and setting of York which has never before been purpose of Green Belt designation for York. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2959/9379 2959/9380 2959/9381 2959/9382	William Birch & Sons & Other Clients

Chapter 3 Spatial Strategy

Paragraph etc	Supporting Comments	Ref.	Name
General	Broadly support.	608/8675	Yorwaste Ltd
Strategic Objective(s)	Support protection of unique character and setting.	242/8637	English Heritage Yorkshire and the Humber Region
	Support.	449/9715	Tesco Stores Limited
	Strong commitment to improving accessibility, permeability and connectivity on foot, by bicycle and public transport is welcome.	2946/8856	GARLAND (The Garden and Landscape Heritage Trust)
Spatial Principle 1	Agree new development in Upper Poppleton should be restricted to land within current main settlement boundary.	86/8591	Upper Poppleton Parish Council
	Support identification of York as main focus for development within CS.	331/8951	Taylor Wimpey (UK) Ltd
	Support.	2519/8708	Mr G W Procter
	Support settlement hierarchy in particular fact that settlements such as Dunnington are designated as a Village and appropriate for small scale development.	2942/8812	DPP
	Support overall settlement hierarchy with emphasis on providing main focus of new development in Sub-Regional City of York.	2953/9234	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Spatial Principle 2	Welcomes incorporation of Green Infrastructure.	4/8889	Natural England Consultation Service
	Supports settlement limits.	79/8570	Nether Poppleton Parish Council
	Support	449/9720	Tesco Stores Limited
Spatial Principle 2 SP2i	Support requirement that sites or future areas for development will need to ensure they will safeguard special historic character and setting.	242/8638	English Heritage Yorkshire and the Humber Region

Chapter 3 Spatial Strategy Continued

Paragraph etc	Supporting Comments	Ref.	Name
Spatial Principle 3	Pleased that release of sites will be sequential and priority given to use of brownfield sites.	55/8468	CPRE (York and Selby District)
	Support major development sites and brownfield development.	79/8571	Nether Poppleton Parish Council
	Support regeneration of brownfield sites before green areas.	80/8579	New Earswick Parish Council
	Support overall principle and in particular section i.	449/9721	Tesco Stores Limited
	Support Area of Search C.	532/9554	Northminster Ltd
	Support identification of Sub Regional City of York as location for development.	546/9052	Miller Homes Ltd
	Supports overall identification of A1, A2 and B growth areas.	2953/9244	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Spatial Principle 3 SP3i	Support for commitments to focus on brownfield sites such as Northwest Corridor, Nestle, Terry's and City Centre sites.	2935/8787	Mr T Bennett
Spatial Principle 3 SP3ii	Support for commitments to focus on brownfield sites such as Northwest Corridor, Nestle, Terry's and City Centre sites.	2935/8788	Mr T Bennett
Explanation			
Protecting and Enhancing York's Green Infrastructure Paragraph 3.10 to 3.12	Support.	85/8585	Strensall with Towthorpe Parish Council
Strategic Allocations and Major Development Opportunities Paragraph 3.21	Support inclusion of former Manor School site within former British Sugar/Manor School Strategic Allocation.	525/9025	Associated British Foods plc
Future Areas of Search for Urban Extensions	Support identification of future areas of search for urban extensions, specifically A1, A2, B and proposed area D.	2953/9257	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Paragraph 3.29	Support.	85/8586	Strensall with Towthorpe Parish Council

Section 3: Spatial Strategy

Paragraph etc	Comments and Objections	Ref.	Name
General	Spatial Strategy and its explanation (paragraphs 3.1 to 3.31) make no reference towards local or national planning policies with regards to land contamination. Throughout CS there is no reference to previous land contamination and how this will be dealt with. Land contamination, or the possibility of it, is a material planning consideration in preparation of development plan documents and in taking decisions on individual planning applications. Add at end of 2 nd Bullet point in Strategic Objectives “through appropriate remediation techniques.” (Grounds Not Consistent with National Policy; Not Legally Compliant)	5/9490 5/9491	Environment Agency
	Does not address fundamental issue of York’s capacity to absorb predicted high levels of growth without causing irreparable harm to unique character and environment. No quantified assessments to appraise strategic ambition to strike balance between physical growth and environmental sustainability.	55/8464	CPRE (York and Selby District)
	Spatial Principles not logically laid out making section unclear. (Grounds Not Justified; Not Effective)	70/8505 70/8506	Fulford Parish Council
	Further development in Monks Cross area takes into account wider implications particularly for traffic.	74/8565	Holtby Parish Council
	Spatial Strategy does no more than simply continue with current settlement pattern. Should be more challenging in examination of role of settlements within district. Could be more emphasis on creation of employment opportunities in villages around City so that they do not merely serve as dormitory suburbs. Also question whether spatial strategy is flexible enough to meet future housing requirements, as level of provision is inadequate to meet future housing needs. Policy of giving priority to previously developed sites before Greenfield sites could also be considered unsound, as PPS3 does not specify a sequential approach. Nor does draft NPPF contain any such presumption. Believe areas of search identified will be inadequate to meet development requirements and additional areas of search should be identified. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	196/9676 196/9677 196/9678	York & North Yorkshire Chamber of Commerce
	Policy presumption in favour of brownfield sites ahead of greenfield sites is no longer consistent with national policy nor effective in terms of meeting housing demand in area. A sequential approach to housing development is no longer consistent with current PPS3 and is more akin to approach in previous PPG3. (Grounds Not Justified; Not Consistent with National Policy)	331/8955 331/8956	Taylor Wimpey (UK) Ltd
	No evidence that objective in Employment Land Review para 4.2 “Developing a Spatial Strategy”, has been applied or that impact and consequences of spatial distribution of employment sites has been considered in sufficient depth.	606/9569	Jennifer Hubbard Planning Consultant

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
General Continued	High voltage underground electricity transmission cables cross Derwenthorpe Strategic Site. Require that no permanent structures are built over or under cables or within zone specified in agreement with landowners, materials or soil are not stacked or stored on top of cable route or its joint bays and that unrestricted and safe access to any of our cable(s) must be maintained at all times. (Comment)	2734/9147	National Grid
	Cycle routes should also be included along side public transport.	2944/8844	York Youth Council
	Term Sub Regional City is not clear and sounds rather demeaning and negative. Suggests “Core of the City” which could then be divided into “Inner Core” (City Centre) and “Outer Core” (rest of main built settlement). Beyond core is Green Belt (rural areas) with islands of development in form of Large Villages, Villages, and Small Villages.	2946/8865	The Garden & Landscape Heritage Trust
	Neither CS or Sustainability Appraisal demonstrate that proposed levels of growth can be accommodated without compromising special character and setting of City. Makes assumptions to levels of growth without establishing a finite limit for future expansion of City. Without this there is no permanent Green Belt, merely land awaiting development in this or subsequent plans. An Environmental Capacity Study should be carried out. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2965/9482 2965/9483 2965/9484	Osbalwick Parish Council & Meadlands Area Residents Association
Strategic Objective(s)	Suggest that heading of first box should be “Objectives of the Spatial Strategy” rather than “Strategic Objectives”.	2946/8864	The Garden & Landscape Heritage Trust
	Should be recognition that not all brownfield sites can be brought forward, due to overriding technical and financial constraints that may restrict a site from being developed. PPS3 provides definitions of “deliverable” and “developable” sites. As currently drafted, plan is not flexible or in accordance with national planning policy. 2 nd bullet point should be amended by inserting: “deliverable and developable” before “brownfield sites.” (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9231 2953/9232 2953/9233	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Spatial Principle 1	New development in Poppleton should be restricted to British Sugar and Manor School brownfield sites and development should be restricted to brownfield areas. (Comment)	79/8569	Nether Poppleton Parish Council
	Strensall/Towthorpe should be classed a village rather than a large village as infrastructure within Strensall is limited, Towthorpe has only a small number of residential properties, whilst Strensall has a large number of properties the facilities do not match the requirements of the population before any further development is considered. Strensall/Towthorpe is at present washed over by the green belt as specified for small villages in CS1.	85/8582	Strensall with Towthorpe Parish Council

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 1 Continued	<p>(ii) Needs rewording to reflect need to provide appropriate levels of development in larger villages rather than limiting development.</p> <p>(iii) Needs further clarification in terms of how further housing development in village can meet both market and affordable need.</p> <p>(iv) Needs to allow for small scale rounding off development boundaries to allow limited development.</p> <p>(ii-iv) should be re-worded to state: -</p> <p>i) Large villages: Haxby and Wigginton, Strensall/Towthorpe and Upper and Nether Poppleton. Large villages will provide appropriate amounts of development in proportion to their size to support economic diversification and to meet affordable and market housing.</p> <p>ii) Villages: Bishopthorpe, Copmanthorpe, Skelton and Dunnington. The defined Villages can accommodate small-scale market and affordable housing development, which helps to support the viability of existing facilities and addresses local needs.</p> <p>iii) Small villages: Development in the settlements not defined by in (i), (ii) and (iii) should be restricted to suitably scaled rounding-off of the settlement boundary and infill development to meet market and affordable housing need. (Grounds Not Effective)</p>	164/9514	Hogg Builders (York) Ltd
	In terms of remaining settlements, other than Sub Regional City, within hierarchy would wish to state that these are subject to development limit/inner Green Belt boundary, which will determine extent of these settlements, and therefore capacity of those settlements to accommodate housing needs required. (Comment)	331/8952	Taylor Wimpey (UK) Ltd
	Clifton Moor should also be classified as a District Centre as well. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	449/9716 449/9717 449/9718 449/9719	Tesco Stores Limited
	Should confirm that redevelopment and infill should be small scale and proportionately even less than in other settlements in hierarchy. By allowing redevelopment without defining its scale, there could be large-scale opportunities in such settlements, which would be consistent with Settlement hierarchy. Fact that they are redevelopment opportunities does not make them sustainable, nor does it make them compatible with settlement hierarchy if they are disproportionately large. Criterion iv should include guidance on scale with additional text to refer to redevelopment and infill only at a scale compatible with the small village” (Grounds Not Justified)	546/9049	Miller Homes Ltd
	Fails to identify quantum of development to be provided at each level of settlement hierarchy. Inconsistent in approach to settlements inset and washed over by Green Belt.	606/9568	Jennifer Hubbard Planning Consultant

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 1 Continued	SP1, 2 and 3 need to be considered collectively to understand their inadequacy. When combined, fail to inform of any specific quantum of development to be distributed. Any proportion of development distribution is also lacking from Key Diagram. To make plan sound, suggests proportionate splits are attached to settlement hierarchy. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9073 2689/9074 2689/9075 2689/9076	Monks Cross North Consortium
	Concerned about approach taken in identification and selection of proposed areas for urban extension. Places insufficient weighting on site availability and whether it is 'developable' and too much emphasis on existing Infrastructure. Infrastructure considerations have been given a disproportionate weighting in assessment of sites suitable for urban extension. Approach taken has effectively excluded all potential sites to west and Halcrow (2009) does not provide sufficient justification to warrant this. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2699/9577 2699/9578 2699/9579	Messrs A & A Atkinson & Sykes
	Further areas of search should be identified around main urban area, and larger villages close to City. CS needs to be more radical and challenging in its approach to spatial strategy by questioning role of dormitory villages and seek to encourage opportunities for employment development commensurate with their size and function. Role and designation of Copmanthorpe should be reassessed. Its designation as a village and not a large village is largely due to poor transport links and relatively poor access to areas of employment. Can be overcome by provision of additional bus services funded by new development. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2940/8808 2940/8809 2940/8810	Shepherd Group Properties
	Should be recognition for need to release appropriately located land from Green Belt around main urban area of York. Add under i) at end of first sentence "To accommodate the necessary growth, development will be delivered by releasing land within the main urban area and urban extensions of varying scale to the City of York." (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9235 2953/9236 2953/9237	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
	Settlement hierarchy does not recognise full range of villages and their roles in helping to deliver sustainable development. Inconsistent with other parts of CS. An additional category needs to be identified to make clear that additional development will be allowed within those small villages which are not washed over by Green Belt as identified in Figure 4.1. As Elvington is included within small village classification where no further development is proposed beyond infill and redevelopment, this would prevent expansion of Airfield Business Park. Elvington and the other two larger villages should be added to the "Village" tier of Settlement Hierarchy. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2959/9383 2959/9384 2959/9385 2959/9386	William Birch & Sons & Other Clients

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 1 SP1ii Large Villages	Not clear what “limited development” in large villages means and how this differs from approach for villages. (Grounds Not Justified; Not Effective)	70/8507 70/8508	Fulford Parish Council
	The Poppletons are similar in size and facilities to Copmanthorpe and should be designated as villages in SP1iii. (Grounds Not Justified)	203/8610	Mrs J Hopton
Spatial Principle 1 SP1iii Villages	Not clear what “small scale development” means and how this differs from approach to large villages. (Grounds Not Justified; Not Effective)	70/8509 70/8510	Fulford Parish Council
	Appears to be contrary to national planning policy because refers only to supply of Affordable Housing in villages, and not meeting a range of housing needs for different tenures. Policy should be amended to refer to importance of addressing local needs by supplying market and affordable housing. (Grounds Not Consistent with National Policy)	165/8905	Home Builders Federation
Spatial Principle 1 SP1iv Small Villages	Unclear what is meant by “infill only”. This does not seem to be defined anywhere in the document. Suggest adding:- “and infill only to the extent that this growth would be compatible with the existing or upgraded infrastructure of the village”. (Grounds Not Effective)	87/8596	Wheldrake Parish Council
Spatial Principle 2	Policy of giving priority to previously developed sites before green field sites may be considered is likely to prove ineffective and will militate against release of other identified sites, such as those in years 6 to 10 that could help meet housing needs. PPS3 only establishes a target for at least 60% of new housing to be provided on PDL. It does not specify a sequential approach. Also questionable whether some of Strategic and Major Development sites can be developed to their entire potential in first ten years. Some flexibility should be built into CS to deal with changing circumstances, especially if some of Strategic and Major Development sites fail to come forward or pace of development is slower than initially forecast. As Council has yet to present a convincing case to show that it will adopt measures and policies to bring forward Strategic Allocations and Major Development Opportunities reference to priority to be given to PDL and buildings should be deleted. (Grounds Not Effective)	165/8906	Home Builders Federation
	Insert an additional Criterion along the following lines: - "The purposes of the Green Belt are not compromised"	242/8639	English Heritage Yorkshire and the Humber Region

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 2 Continued	Role of previously developed land is not clear. Not clear whether this is a sequential approach which requires that greenfield land will not be identified or developed until all previously developed sites have been utilised. Evident in York that previously developed land opportunities present greater challenges to their delivery. Whilst this should not rule out their contribution, it means CS should recognise this, not place over reliance upon their role on a sequential basis and ensure it is flexible enough to allow the development of greenfield sites through plan period to ensure appropriate levels of growth are delivered consistently. (Grounds Not Justified; Not Effective)	546/9050 546/9051	Miller Homes Ltd
	Greenfield land could be more conducive to creating sustainable development than brownfield land. Merits of developing greenfield sites should not be judged upon before Council have completed a proper assessment of extent of Housing and Employment Land needs and before establishment of appropriate and long-term Green Belt boundaries. Will be a need to release greenfield land to cater for both short-term needs of District as well as for its longer term needs at a time when supply of previously developed land will have diminished. PPS3 recognises that development on greenfield land is a legitimate component of supply of housing land. Important to note there is no longer a presumption that previously developed land should be developed before greenfield land, so essential that greenfield land is not disregarded. Spatial Principle not sound as Council does not appear to have carried out a proper assessment of the housing and employment needs of the District with the result that the Spatial Principle is not based upon sound evidence. In addition, Spatial Strategy does not comply with national policy and is not sound in that respect either. (Grounds Not Justified; Not Consistent with National Policy)	2519/8709 2519/8710	Mr G W Procter
	SP1, 2 and 3 need to be considered collectively to understand their inadequacy. When combined, they fail to inform of any specific quantum of development to be distributed. Any proportion of development distribution is also lacking from Key Diagram. To make plan sound, suggests proportionate splits are attached to settlement hierarchy. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9077 2689/9078 2689/9079 2689/9080	Monks Cross North Consortium
	Concerned about approach taken in identification and selection of proposed areas for urban extension. Places insufficient weighting on site availability and whether it is 'developable' and too much emphasis on existing Infrastructure. Infrastructure considerations have been given a disproportionate weighting in assessment of sites suitable for urban extension. Approach taken has effectively excluded all potential sites to west and Halcrow (2009) does not provide sufficient justification to warrant this. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2699/9580 2699/9581 2699/9582	Messrs A & A Atkinson & Sykes

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 2 Continued	<p>Object because: - Greenfield land could be more sustainable to develop than alternative brownfield land; development of greenfield sites should not be prejudged before Council have completed a proper assessment of extent of district's housing and employment land needs and establishment of appropriate and long term Green Belt boundaries; will be a need to release greenfield land both to cater for short term needs of district as well as longer term needs when supply of previously developed land (PDL) will be diminished as time goes by. Whilst legitimate to seek to secure development on PDL, apparent that district's housing requirement cannot be satisfied from this source of land exclusively. PPS3 recognises that development on greenfield land is a component part of the housing land supply and in this context important to note there is no longer a sequential preference that PDL should be developed before greenfield land. In this regard strategic principle is contrary to national guidance.</p> <p>Development of greenfield sites, whether in or on edge of city or in outlying villages, will be necessary and should not be precluded by this strategic principle.</p> <p>Therefore essential that greenfield land is not disregarded, as it forms an important part of land supply, and there is no policy basis for seeking to do so.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)</p>	2942/8813 2942/8814 2942/8815 2942/8816	DPP
	<p>Is merely repeating policy and does not provide an overall spatial framework for CS. Should be deleted.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	2953/9238 2953/9239 2953/9240	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
	<p>Not in accordance with national planning policy or Government's growth agenda because they prioritise previously developed land and buildings over more important need to maintain a land supply to respond to development needs. Furthermore, will not deliver development across district to meet different needs.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)</p>	2959/9387 2959/9388 2959/9389 2959/9390	William Birch & Sons & Other Clients
Spatial Principle 2 SP2iii	Flood risk is from poor drainage rather than from the River Foss.	85/8583	Strensall with Towthorpe Parish Council

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 3	Concerned about flexibility of planning for York to ensure that long term development needs can be met, without adversely impacting on neighbouring parts of Hambleton District lying outside Green Belt. Would be useful to identify 'safeguarded land' to meet longer term needs, stretching well beyond plan period, in accordance with draft National Planning Policy Framework and PPG2. The identified Areas of Search are required for plan period and from current discussions only appear to provide for approximately a 2.5 year over supply of housing. (Comment)	14/8894	Hambleton District Council
	No basic summary of statistics provided. No statistics provided of how much green belt land has been lost since 1996. No environmental capacity study has been carried out. Alternatives to peripheral growth of main urban area have not been fully considered. (Grounds Not Legally Compliant; Not Effective) Unrealistic assumption that brownfield land will deliver numbers of homes and jobs within earlier years of plan given constraints on these sites. Developers could argue they need to bring forward areas A and B at an earlier stage. If land is deleted from green belt development will be inevitable. (Grounds Not Legally Compliant; Not Effective Not Justified)	65/8473 65/8474 65/8473 65/8474 65/8475	Copmanthorpe Parish Council
	Numbering sequence not logical and does not clarify sequential approach to development. There is also overlap and conflict with SP1. (Grounds Not Justified; Not Effective)	70/8511 70/8512	Fulford Parish Council
	Not convinced by forecast of population growth for York, which underpins proposals for allocating land for housing because of economic situation and changing composition of households.	73/8563	Heworth Without Parish Council
	Oppose future developments within draft green belt including areas of search A1 and A2. Huntington is already a large community and needs green belt to prevent undesired effects of urbanisation, deterioration of air quality and surface water drainage, increasing volumes of traffic and the general loss of open aspects. (Grounds Not Effective)	75/8567	Huntington Parish Council
	Present wording of Policy CS1 (ii)- (iv) inconsistent with SP3 (iv) as does not clearly define allowance of small-scale non-strategic expansions to smaller settlements. (Grounds Not Effective)	164/9515	Hogg Builders (York) Ltd

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 3 Continued	Is not flexible and may militate against sustaining the pace of house building in the district. Query effectiveness of sequential approach articulated. So long as Council's target of 79% development on PDL is achieved then it should be immaterial when other 21% of supply on green field sites is permissioned. The policy is also contrary to national planning policy. The draft NPPF, advises that Local Plans should allocate sites to promote development and provide for flexible use of land. (Grounds Not Effective; Not Consistent with National Policy)	165/8907 165/8919	Home Builders Federation
	Broad locations for these are identified in Key Diagram, which is helpful, but to ensure that these areas are deliverable and can be developed because necessary supporting infrastructure is in place, then work to plan for these areas must commence now. A programme and timetable setting out what needs to be done to ensure that these sites are ready for development from 2021 onwards, needs to be set out in CS. Policy should articulate a clearer commitment to undertake this planning work to ensure that it has an adequate housing land supply to underpin the plan. (Grounds Not Effective)	165/8919	
	Whilst accepted that a higher percentage of development is likely to be contained within and adjacent to main urban area, this assumption should not prohibit delivery of other sites not within this location so long as they would not contravene overall aims of plan. Policy as written would be inflexible and would not allow suitable sites to come forward. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	331/8960 331/8961 331/8962	Taylor Wimpey (UK) Ltd
	Role of York Central and British Sugar/Manor School strategic allocations should not mean that both of these sites should be sequentially the first priority for development and be delivered before all other sites. Both sites have major challenges and their scale means that they will be delivered throughout entire plan period. Other sites will be needed in order to ensure that delivery of growth and development is consistent over plan period. (Grounds Not Legally Compliant)	546/9053	Miller Homes Ltd
	Criterion iii - not clear when a site becomes so strategic in scale, that it should be included within CS and not Allocations DPD. Sites A1 and C could be left to the Allocations DPD. Also needs to be made clear that identification of these sites in CS does not endorse their precise boundaries or scale. No justification as to why Areas A1, A2 and B should be sequentially identified above such other sites. (Grounds Not Justified)	546/9054	

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
<p>Spatial Principle 3 Continued</p>	<p>CS does not seek to meet York's housing needs but, rather, to set housing delivery at a level which contains quantum of greenfield land taken from "notional" Green Belt to a level which is politically acceptable at present time. Housing provision not supported by RSS, SHMA and most recent SHLAA is out of date. Most up to date (2008) ONS statistics indicate an annual average housing requirement for York to 2033 of 1250 additional units. This is significantly higher than CS. Housing provision also relies in part on delivery from windfall sites, contrary to national guidance. Early delivery of housing from York Northwest strategic site is unrealistic.</p> <p>Under-providing housing will exacerbate social divisions within City and run counter to one of key elements of LDF, which is to build confident, creative and inclusive communities. Supply of land for B1(c), B2 and B8 uses is currently inadequate and CS fails to address current deficiencies let alone make provision for future growth in these sectors. There is a need for a strategic site (or sites) for these uses to be identified for immediate release. Grimston Bar is sequentially most appropriate site for employment development, particularly for these purposes.</p> <p>An Area of Search for residential development should be identified around Haxby and Wigginton since it is unlikely a criteria based CS policy would be sufficiently detailed or robust to provide necessary guidance for amount of development land required. Area of Search A1 is a very small area, which could easily come forward at Allocations stage. It is inconsistent to identify this small area as an area of search, yet make no similar proposals for Haxby/Wigginton,</p> <p>Will not deliver sustainable patterns of development nor does government policy require brownfield land to be developed in preference to greenfield land.</p> <p>Evidence base does not support a location at Northminster. Land at Grimston Bar is sequentially preferable.</p> <p>No provision is made for safeguarded land to provide options for amount and direction of growth of City over a period longer than LDF period.</p> <p>If land to north of Northminster is developed for employment use it will generate additional traffic in same location as proposed access to York Central and could jeopardise successful development of York Central.</p> <p>Little evidence that importance of manufacturing and export sectors, have been understood or addressed, or that additional land will be allocated. Absence of a clear strategy for growth of manufacturing, as a discrete employment sector, is a major failure.</p>	<p>606/9556 606/9732 606/9557</p>	<p>Jennifer Hubbard Planning Consultant</p>

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 3 Continued	<p>Use of sequential approach to bring sites forward for employment use, can only have a negative effect on creation of employment. This would not be required if sufficient land was allocated.</p> <p>Focus of employment generation, in CS is York Central and Science City York. York Central is aspirational and has still not been developed. Science City York may create high quality jobs, but is not type of employment, which would be suitable for 7% in City whose formal academic qualifications are minimal. A strategy, which draws highly qualified and highly paid professionals into area, will have effect of further increasing cost of housing. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	<p>606/9556 606/9732 606/9557</p>	<p>Jennifer Hubbard Planning Consultant Continued</p>
	<p>Consultation results show that majority of residents believe that housing targets of 850 homes per year are too high, yet these remain in strategy. Results also show majority of residents opposed to identifying areas in draft green belt for development, yet strategy includes two such areas. Strategy must reflect views of the people who live in the City and must therefore be altered by reducing housing targets and retaining areas of search as green belt land. (Grounds Not Justified)</p>	<p>1132/8394 1277/8458 2910/8380 2911/8383 2916/8405 2917/8408 2918/8411 2919/8414 2920/8417 2922/8428 2923/8431 2924/8434 2925/8437 2926/8440 2928/8443 2929/8446 2930/8449 2937/8461 2968/9591</p>	<p>Mrs B S Hilton Mrs A Stafford W & C B Pawelee Mrs M P Rowntree Mr & Mrs J&M Teasdale K Richardson J Almond B R Ellis Mr & Mrs WP & J Legg Mrs V B Swaby Mr S Briggs AW & CB Dodd B & S Osborne J Nicholson C Summers/C Kennedy J A Wood M S Wood Ms L Stafford P & A Suffield</p>
	<p>The area of Site B is vague. Boundaries are imprecise and will lead to arguments if site is considered in due course. Further there is no discussion on how it can be serviced by roads. One map that has been circulated involves roundabouts from A64 and consequentially more damage to greenfield area. Does not appear that all implications have been thought through. Should be some acknowledgement that boundaries need to be set and what overall damage to greenfield area and consequences to Murton will be.</p>	<p>2178/8697</p>	<p>Murton Parish Council</p>

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 3 Continued	<p>Figure 4.1 shows the location of the 'areas of search', which are located in the draft Green Belt, despite 60% of residents opposing identification of land in the Green Belt for development. The strategy therefore cannot be 'justified' as it ignores a fundamental part of the evidence base, namely the views of local people. Unrealistic in assuming that brownfield land will deliver the numbers of homes and jobs within the earlier years of the plan, given the considerable constraints on Sites A and B. If the assumptions are not reliable, developers could argue that they need to bring forward areas of search A & B at a much earlier stage in the Plan. Allocation of search areas A and B is unnecessary and puts draft Green Belt land at risk of development.</p> <p>The housing targets should be revised downwards. This would allow for the areas of search A and B to be removed from the strategy, making the plan more effective at prompting the use of brownfield sites above greenfield and again responding to the wishes of residents.</p> <p>(Grounds Not Effective; Not Justified)</p>	2459/8701 2459/8706	Cllr C Runciman
	<p>Object to land north of Area of Search A2 being identified as a Strategic Open Space. Site land off Avon Drive, Huntington has been promoted through SHLAA and LDF as a sustainable location for housing. At no stage has it been promoted to benefit green infrastructure of York and as site is in private ownership cannot be allocated as a site capable of providing a buffer to future urban extension.</p>	2515/9575	Pilcher Properties Ltd
	<p>Fails to follow principles set out in SP1. Appears to preclude the development of any form of greenfield site in any location other than in the city itself or in the identified major urban expansion sites.</p> <p>Appears to give too much weight to the delivery of the identified "Major Development Opportunity" sites. All have been available for some considerable period of time and have not been developed. Furthermore, wrong to assume that the resultant shortfall in housing land can be made up by other sites within York itself and by brownfield sites in the "Large Villages" and "Villages". There will need to be an early release of suitable additional land for development and this should be reflected in this policy.</p> <p>In order to meet the District's housing need and to provide a range and choice of housing sites it is essential that appropriate opportunities for the development of greenfield sites together with the limited expansion of certain Local Service Centres and Villages are identified. Reference should be made to the possible development of greenfield land both within, and on the edge of, such settlements.</p> <p>(Grounds Not Justified)</p>	2519/8711	Mr G W Procter

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 3 Continued	A range and choice of safeguarded land sites should be identified using similar principles to those employed in identifying housing land. Object to the absence of any such policy in current version of CS, which is also unsound because of its failure to secure a permanent Green Belt. CS conflicts with National Policy. Because it will be incapable of responding flexibly to demand for development towards end of plan period it cannot be effective. (Grounds Not Effective; Not Consistent with National Policy)	2519/8712 2519/8713	Mr G W Procter Continued
	Suggest that Provision (iii) should include land at Northfield/Wheatfield, unless it can come forward earlier. Should be identified as a Strategic Allocation/Major Development Opportunity and progressed through Allocations DPD. (Comment) Provision (iv) suggests that Area C (Land adjoining Northminster Business Park) will come forward for employment use dependent upon monitoring of Council's 10-year supply. Given concerns over modest employment growth ambitions and Government's desire to encourage economic growth, suggest that no such constraint is placed on Area C. CS should include a positive framework for bringing site forward. (Grounds Not Justified; Not Consistent with National Policy)	2537/9615 2537/9616 2537/9617	Lancaster & Burneston Family
	SP1, 2 and 3 need to be considered collectively to understand their inadequacy. When combined, they fail to inform of any specific quantum of development to be distributed. Any proportion of development distribution is also lacking from Key Diagram. To make plan sound, suggests proportionate splits are attached to settlement hierarchy. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant))	2689/9081 2689/9082 2689/9083 2689/9084	Monks Cross North Consortium
	Concerned about approach taken in identification and selection of proposed areas for urban extension. Places insufficient weighting on site availability and whether it is 'developable' and too much emphasis on existing Infrastructure. Infrastructure considerations have been given a disproportionate weighting in assessment of sites suitable for urban extension. Approach taken has effectively excluded all potential sites to west and Halcrow (2009) does not provide sufficient justification to warrant this. Inadequate identification of areas for urban extension and not ensuring sufficient land of the right type, and in the right places is available to allow growth and innovation means CS does not meet requirements of emerging NPPF. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2699/9583 2699/9584 2699/9585	Messrs A & A Atkinson & Sykes

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 3 Continued	Concerned that increased housing target will have environmental impacts on Green Belt and greenfield land, which surrounds the City Centre. Two Areas of Search (A2 & B) would potentially include use of agricultural land. Appears that land in Huntington, Heworth Without and Osbaldwick has been set aside to meet housing targets. Feels this will encourage developers to submit further planning applications for Green Belt and greenfield land. CS should be amended to ensure that all existing Green Belt land is protected through the LDF.	2726/8743	Mr J Sturdy MP
	Document was subject to major changes from that published in 2006, 2007 and 2009 without public consultation or debate at LDF working group. Disagrees entirely with inclusion of search area B as a site for housing development.	2881/8377	Cllr M Warters
	Number of new homes planned for Huntington too large; use of Green Belt land unacceptable loss of amenity; development would increase traffic and place strain on local Infrastructure and amenities. (Grounds Not Justified)	2915/8403	D Neal
	Object as it fails to follow principles set out in SP1 and appears to preclude development of any form of greenfield sites in any location other than the city itself or the three identified major urban expansion sites. CS appears to give too much weight to delivery of identified major development opportunity sites, all of which have been around for a considerable period of time and have not been developed. Also wrong to assume that slacks in housing delivery, caused by major development opportunity site, not being delivered could be made up from other sites within York itself and brownfield sites in large villages and villages. No evidence to substantiate this sequential approach. Will be a need for early releases of additional land, including greenfield sites within city or on its edge and within villages, for development that is deliverable and this should be reflected here. To meet District's housing need and provide a range and choice of housing sites, essential that appropriate opportunities for development of greenfield sites and limited expansion of certain Local Service Centres and Villages are allowed for and reflected in CS. Policy needs to have a more balanced and considered approach to release of land for development. Should also identify a range and choice of safeguarded land sites. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2942/8817 2942/8818 2942/8819 2942/8820	DPP

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 3 Continued	<p>Will fail to deliver sufficient supply of land to meet City's housing needs and proposed new housing numbers over plan period is too low. Reliance on small windfall sites of less than 0.2ha and conversion of large properties coming throughout plan period is contrary to PPS3.</p> <p>Even if housing numbers are accepted, as well as all of identified areas of supply, including small windfall sites, this leaves a supply shortfall of 3,733 dwellings. Therefore Areas of Search for urban extensions will be a critically important element of land supply.</p> <p>Inappropriate, and again contrary to national guidance, to plan for this shortfall to be met through as yet unidentified sites in appropriate locations and it follows that broad Areas of Search should be extended to properly plan for City's future housing land requirements.</p> <p>Area of Search A1 should be extended both southwards and westwards to incorporate land at the junction of New Lane and Malton Road, Huntington.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	2950/9188 2950/9189 2950/9190	Taylor Wimpey UK Ltd
	<p>Areas A2, B and D will need to be released in parallel, therefore current wording is overly onerous and restrictive. Principle is attempting to go further than RSS Policy YH7 by setting out a sequential approach for entire City of York area. Using settlement hierarchy identified in SP1, Policy CS6 should provide policy for future identification of land for each tier of settlement hierarchy, rather than City of York as a whole.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	2953/9241 2953/9242 2953/9243	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
	<p>High level of dependence on urban brownfield sites is not supported by facts and is unrealistic. The defined Future Areas of Search for Urban Extensions are too limited to allow for Allocations DPD to identify sufficient suitable sites and to ensure capacity for necessary increased rate of delivery of new homes to be achieved when the economy strengthens. An additional Area of Search to South of Moor Lane is proposed.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	2954/9331 2954/9332 2954/9333	Consortium of Landowners of Land South of Moor Lane
	<p>CS is flawed due to way in which sustainability issue has been addressed particularly relating to growth within City Centre and within rural/surrounding villages. No evidence that any assessment has been undertaken. (Grounds Not Effective)</p>	2955/8738	Cyclists Touring Club North Yorkshire
	<p>Not in accordance with national planning policy or Government's growth agenda because they prioritise previously developed land and buildings over more important need to maintain a land supply to respond to development needs. Furthermore, will not deliver development across district to meet different needs.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)</p>	2959/9391 2959/9392 2959/9393 2959/9394	William Birch & Sons & Other Clients

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 3 Continued	Identification of search area B not justified and dismisses 20 years of accepted Planning Inspectors and Council views as to value of this Green Belt land to setting of City. No evidence to support inclusion of Area B. Retention of land to east of Outgang Lane as a Green Belt Character Area further undermines Area B. Area B as a green wedge has great value to visual setting of City. Inclusion of Search Area B will continue to undermine urban regeneration in York. Search Area B should be removed. Following a poll of residents in Osbaldwick 95% were against future housing development on search Area B. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2965/9467 2965/9468 2965/9469	Osbaldwick Parish Council & Meadlands Area Residents Association
	Increase in housing targets not justified. Would put Green Belt in danger of being developed. Character of York needs to be protected. Target should be reduced to previous figure of 14000. (Grounds Not Justified)	2966/9587	Mr K Nicholson
	Vital to protect Green Belt, which will be put in danger of development if housing targets over next 25 years are increased from 14000 to 19500. (Grounds Not Justified)	2967/9589	Mrs M H Nicholson
Spatial Principle 3 SP3i	Approach taken by CS unsound in respect of proposal to direct general industrial and distribution employment uses to land around Northminster Business Park (NBP) in preference to land North of Hull Road, Grimston Bar (GB). Also unsound in delaying promotion and development of new opportunities for general industrial and distribution employment land until existing allocations and brownfield land are committed. Council has commissioned a number of Employment Land Reviews. Clear from this work that NBP performs poorly in comparison to GB as a potential site to accommodate employment growth. Decision to support NBP runs counter to Policy CS18i. It is not served by public transport network. Moreover, it is located at some distance from nearest bus stop and certainly not within a comfortable walking distance. In contrast, GB is within 5 minutes walk of one of city's park & ride sites and located alongside a key public transport corridor. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2687/8721 2687/8722 2687/8723	Tangent Properties
	Needs to be specific strategic roles defined for each site. Also, timescales are crucial and action needs to be specified to make sure they come forward now to meet needs. Major problems and questions need to be addressed regarding impact of allocations on northern section of Outer Ring Road, which is already congested and causes problems for residents in crossing or travelling along it.	2935/8789	Mr T Bennett
Spatial Principle 3 SP3ii	"Brownfield or infill development within identified large villages and villages or existing freestanding employment sites". This conflicts and overlaps with SP1 (ii) and (iii) (Grounds Not Justified; Not Effective)	70/8513 70/8514	Fulford Parish Council

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 3 SP3ii Continued	Should take a similar approach to Selby District Council and promote use of North Selby site, and other vacant freestanding sites previously used for employment purposes. It is considered particularly important that both CSs are coherent in respect to North Selby site given that it straddles administrative boundary between two authorities. It is suggested that wording should be amended to read: - “Brownfield or infill development within identified Large Villages and Villages or freestanding employment sites which are appropriate in scale and nature and helps support the viability of some of the existing facilities or addresses local needs.” (Grounds Not Effective; Not Consistent with National Policy)	515/9536 515/9537	Harworth Estates
	Approach taken by CS unsound in respect of proposal to direct general industrial and distribution employment uses to land around Northminster Business Park (NBP) in preference to land North of Hull Road, Grimston Bar (GB). Also unsound in delaying promotion and development of new opportunities for general industrial and distribution employment land until existing allocations and brownfield land are committed. Council has commissioned a number of Employment Land Reviews. Clear from this work that NBP performs poorly in comparison to GB as a potential site to accommodate employment growth. Decision to support NBP runs counter to Policy CS18i. It is not served by public transport network. Moreover, it is located at some distance from nearest bus stop and certainly not within a comfortable walking distance. In contrast, GB is within 5 minutes walk of one of city’s park & ride sites and located alongside a key public transport corridor. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2687/8724 2687/8725 2687/8726	Tangent Properties
Spatial Principle 3 SP3iii	Expansion of the Sub Regional City to meet future housing need sequentially in Areas A1, A2 and B. This is in direct conflict with SP2 (i) and (ii) and potential conflict with SP2 (iii) and (iv). Principle of expanding the main urban area as preferred choice is unsound. Alternative strategies should be considered to accommodate land-hungry forms of development such as low-density housing and business uses. (Grounds Not Justified; Not Effective)	70/8515 70/8516	Fulford Parish Council
	As Parish Council is working with Rural Action Yorkshire to explore a local Community Plan ask that proposals for Site B acknowledge future potential of such a plan.	73/8737	Heworth Without Parish Council
	Incursion into east of City’s Green Belt by Search Area B premature, unnecessary and unwelcome by residents and is opposite of public consultation. (Grounds Not Justified)	142/8900	Meadlands Residents Association

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 3 SP3iii Continued	Should be no development on Green Belt at all.	1965/9570	Ms D Marsh
	Objects to Monks Cross housing allocation as: - will add to congestion along northern section of Outer Ring Road; will increase car travel because housing is not linked to employment land provision; Monks Cross already faces additional traffic from existing employment land provision, the new stadium proposals and possible additional retail floorspace; unacceptable in environmental/Green Belt terms - and would adversely affecting residents amenities in that it would create another urban environment along northern Outer Ring Road.	2935/8791	Mr T Bennett
	Needs to be signalled that A1, A2 and B refer to Areas of Search. This is because there are also areas 1A and 1B, which are parts of Northwest Corridor. To avoid confusion, perhaps different identifiers can be found for one or the other.	2946/8866	The Garden & Landscape Heritage Trust
	Sequential approach prioritising Areas A1, A2 and B on Key Diagram should be deleted.	2963/9462	Mr T Cottrell
Spatial Principle 3 SP3iv	Last sentence states: "Small scale non-strategic expansions of settlements for housing or any additional employment land outside settlements identified will be guided by Spatial Principle 2". This overlaps and conflicts with SP1 (iv), which restricts development in the smallest settlements to "redevelopment or infill only". It also conflicts with Policy CS1 (p32), which confirms that small villages will be washed over by green belt. In these areas, green belt policies will preclude expansion of these settlements. (Grounds Not Justified; Not Effective)	70/8517 70/8518	Fulford Parish Council
	Including Northminster extension further threatens the Green Belt and its main purposes for York. With this development, B is likely. Site should be omitted as a possible employment site. (Grounds Not Justified)	203/8611	Mrs J Hopton
	Approach taken by CS unsound in respect of proposal to direct general industrial and distribution employment uses to land around Northminster Business Park (NBP) in preference to land North of Hull Road, Grimston Bar (GB). Also unsound in delaying promotion and development of new opportunities for general industrial and distribution employment land until existing allocations and brownfield land are committed. Council has commissioned a number of Employment Land Reviews. Clear from this work that NBP performs poorly in comparison to GB as a potential site to accommodate employment growth. Decision to support NBP runs counter to Policy CS18i. It is not served by public transport network. Moreover, it is located at some distance from nearest bus stop and certainly not within a comfortable walking distance. In contrast, GB is within 5 minutes walk of one of city's park & ride sites and located alongside a key public transport corridor.	2687/8727 2687/8728 2687/8729	Tangent Properties

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Spatial Principle 3 SP3iv Continued	Should be amended to support allocation of Grimston Bar as a suitable employment land location and reference to Northminster Business Park removed. Should be further amended to allow for early release of Grimston Bar so it can make a full and meaningful contribution to sustainable economic growth throughout plan period and offer choice to businesses. Key Diagram should be altered to remove Northminster Business Park and replace this “Area C” with Grimston Bar. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2687/8727 2687/8728 2687/8729	Tangent Properties Continued
Explanation			
Para 3.02	Wording of first part of paragraph needs to be clarified. At present difficult to understand.	2946/8867	The Garden & Landscape Heritage Trust
The Role of the City and District Centres Para 3.05 & Figure 3.1	Fail to recognise Monks Cross as a District Centre. By ignoring Monks Cross, CS fails to provide necessary guidance for development to one of its largest and most successful development opportunities. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9085 2689/9086 2689/9087 2689/9088	Monks Cross North Consortium
The Role of the City and District Centres Figure 3.1	Village of Deighton drawn to east of A19 but is actually located to west of A19. Fordlands Road and Heslington Village are included within main urban area and not marked on diagram as “small villages” in settlement hierarchy. (Grounds Not Justified; Not Effective)	70/8521 70/8522	Fulford Parish Council
	Council should recognise special character of Heslington Village in CS and include it in sustainable settlement hierarchy map. (Grounds Not Justified; Not Effective)	2947/8883 2947/8884	Mrs L Hatton
Figures 3.1 to 3.6	Maps that inform Spatial Strategy are inconsistent. (Grounds Not Justified; Not Effective)	70/8519 70/8520	Fulford Parish Council
Preserving York's Special Historic and Built Environment	As a result of Historic Character and Setting Technical Paper Assessment, Council is effectively discounting site at Dringhouses. Object to recommendation in Technical Paper; as comments are inaccurate. Areas A, B and a new D are required. Paragraphs 3.6 – 3.9 and figure 3.2 should be deleted. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9245 2953/9246 2953/9247	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Preserving York's Special Historic and Built Environment Figure 3.2	Suggest that generality of Green Belt is indicative only and does not reflect inner Green Belt boundary. In particular suggest that Green Belt boundary in vicinity of Knapton should follow A1237 ORR with general extent of land inside ORR designated as an “area of Search”. (Grounds Not Justified; Not Consistent with National Policy)	2537/9619 2537/9620	Lancaster & Burneston Family

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Explanation Continued			
Preserving York's Special Historic and Built Environment Figure 3.2 Continued	Title needs to be revised to make it clear that “white areas” are part of the Green Belt.	2946/8869	The Garden & Landscape Heritage Trust
	The exclusion of York Designer Outlet from Extension of Green Wedge should include all of Outlet's land ownership, including 20 acres of land on southern boundary. Amend figure 3.2: York's Green Belt Character Areas to exclude all of Designer Outlet's land ownership. (Grounds Not Justified)	2951/9212	York Designer Outlet
	Built up area of city does not coincide with built up area on Key Diagram. University campuses should both be shown as settlement notation even though they are low density, rather than area retaining rural character. (Comment)	2958/9337	University of York
Preserving York's Special Historic and Built Environment Para 3.09	Examples of “ridge and furrow fields” exist at Strensall/Towthorpe but are not mentioned.	85/8584	Strensall with Towthorpe Parish Council
Protecting and Enhancing York's Green Infrastructure Para 3.10 & 3.11 and Figure 3.3	Concerned at blanket approach in paragraph 3.10. Figure 3.3 makes no distinction between hierarchy of international, national, regional and locally designated sites contrary to PPS9. CS as drafted is seeking to introduce an overarching approach to protect all forms of green infrastructure, without giving due regard to site-specific issues and value of that particular site. Approach is contrary to national guidance. Paragraphs 3.10 – 3.11 and Figure 3.3 should be deleted. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9248 2953/9249 2953/9250	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Protecting and Enhancing York's Green Infrastructure Para 3.12 & 3.13 and Figure 3.4 & 3.5	Given site-specific nature of Green Corridors Technical Paper (2011) and Open Space, Sport and Recreation Study (2008), findings should inform Site Allocations DPD rather than CS. Paragraphs 3.12 – 3.13 and Figures 3.4 and 3.5 should be deleted. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9251 2953/9252 2953/9253	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Protecting and Enhancing York's Green Infrastructure Figure 3.4	Diagram should have been produced in a legible form as they provide an important framework for Allocations DPD. (Grounds Not Justified; Not Effective)	70/8523 70/8524	Fulford Parish Council

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Explanation Continued			
Minimising Flood Risk Para 3.15	Approach contrary to national guidance. Wording is inflexible and may prevent development of greenfield sites in otherwise sustainable locations, where only part of site may be at risk of flooding and this can be accommodated and overcome within overall layout of development, or where it is possible to introduce mitigation measures. Paragraph should be deleted. Policy CS22 adequately deals with matters relating to flood risk. (Grounds Not Consistent with National Policy)	2950/9198	Taylor Wimpey UK Ltd
Sequential Approach to Development Para 3.16	Description of Germany Beck as part of urban area of Sub Regional City not justified because site lies in open countryside in draft green belt where inner boundaries have not yet been defined and development has not commenced. (Grounds Not Justified; Not Effective)	70/8501 70/8502	Fulford Parish Council
Strategic Allocations and Major Development Opportunities	Necessary guidance for Monks Cross is absent. View that Monks Cross [including Monks Cross North and Monks Cross South needs to be elevated from "Future Areas of Search" and more positively promoted as a sustainable settlement in its own right. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9089 2689/9090 2689/9091 2689/9092	Monks Cross North Consortium
	Inclusion of non-strategic sites with planning permission within CS is contrary to PPS12. Following sites should be deleted from whole CS: Castle Piccadilly; Hungate; Heslington East; Nestle South; and Derwenthorpe and Germany Beck. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9254 2953/9255 2953/9256	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Strategic Allocations and Major Development Opportunities Para 3.20 and Para 3.26	Terry's shows what happens when bold words are let down by economic reality - the redevelopment has ground to a halt. York Central is just a dream. Widely acknowledged that the process of procurement and development in the UK stifles development of infrastructure-heavy sites - there is overseas evidence, which might be applied here.	551/8368 551/8369	Constructive Individuals
Strategic Allocations and Major Development Opportunities Para 3.21	Government policy indicates that a sustainable development requires social, environmental and economic elements should be considered together and, in so far as their implications might conflict, these should be balanced. Policy C4 as drafted has potential to displace that balance in favour of environment, to detriment of social and economic benefits that development can provide. Therefore, object to inclusion of references to delivering PPS1 standards for Eco Towns and request that this wording be removed. Additionally PPS1 standards for Eco Towns will be superceded by publication of NPPF. Wording of Policy should be amended to ensure that document, when published, does not make reference to policy documentation that may shortly be superceded.	525/9034	Associated British Foods plc

Section 3: Spatial Strategy Continued

Paragraph etc	Comments and Objections	Ref.	Name
Explanation Continued			
Strategic Allocations and Major Development Opportunities Para 3.27	Considerable uncertainty exists as far as Germany Beck is concerned which raises issues of deliverability. (Grounds Not Justified; Not Effective)	70/8503 70/8504	Fulford Parish Council
Future Areas of Search for Urban Extensions	Believes CS cannot deliver quantities of homes or jobs against assumption of utilising brownfield sites in early years, rendering the plan untimely, unrealistic, unachievable and unreliable. In addition developers would gain an advantage by making a case that there is a need to bring forward areas A and B much earlier resulting in the development of green belt land whilst brownfield sites remain undeveloped. (Grounds Not Effective)	75/8566	Huntington Parish Council
	Objects to Monks Cross housing allocation as: - will add to congestion along northern section of Outer Ring Road; will increase car travel because housing is not linked to employment land provision; Monks Cross already faces additional traffic from existing employment land provision, the new stadium proposals and possible additional retail floorspace; unacceptable in environmental/Green Belt terms - and would adversely affecting residents amenities in that it would create another urban environment along northern Outer Ring Road.	2935/8792	Mr T Bennett
	Given over-reliance on a limited number of complex brownfield sites, current housing market and fact that every single site identified will not be delivered over LDF period, Council will need to identify even more sites. Recommend that “future” is deleted from title to read “Areas of Search for Urban Extension”. Additional site be identified for release for residential development - South of Moor Lane, Dringhouses (Other Area of Search D) (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9258 2953/9259 2953/9260	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Future Areas of Search for Urban Extensions Para 3.28	Unclear how SP1 could have informed selection of sites to be removed from green belt. SP1 does not mention extending main urban area, but is merely the settlement hierarchy. (Grounds Not Justified; Not Effective)	70/8525 70/8526	Fulford Parish Council
	Incursion into east of City’s Green Belt by Search Area B premature, unnecessary and unwelcome by residents and is opposite of public consultation. (Grounds Not Justified)	142/8901	Meadlands Residents Association
	Object to manner in which CS approaches 'areas for potential development in longer term'. Lacks necessary certainty required in plan making. It fails to plan strategically for growth. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9093 2689/9094 2689/9095 2689/9096	Monks Cross North Consortium
Future Areas of Search for Urban Extensions Para 3.29	Should be amended to include potential urban extensions for employment, in addition to residential, use. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2687/9666 2687/9667 2687/9668	Tangent Properties

Chapter 4 The Role of York's Green Belt

Paragraph etc	Supporting Comments	Ref.	Name
General	Welcome intention to establish permanent Green Belt.	16/8496	Selby District Council
	Support principle of creating permanent Green Belt boundary which will endure until at least 2031.	331/8950	Taylor Wimpey (UK) Ltd
	Broadly support.	2537/9618	D; L Lancaster; Philiskirk & Sons Ltd; Burneston Family
	Welcome removal of land at Monks Cross (both North and South) from Green Belt.	2689/9097	Monks Cross North Consortium
	Welcomes objective to determine Green Belt that will remain untouched for next 20 years.	2898/9166	York Environment Forum
Policy CS1	Strongly support.	79/8572	Nether Poppleton Parish Council
	Support should be no development outside existing settlement limit and key Green Belt areas inside and outside A1237 should be preserved.	86/8590	Upper Poppleton Parish Council
	Welcomes reference to not compromising views of Minster on skyline and protecting Green Belt.	1965/9571	Ms D Marsh
Explanation Figure 4.1	Welcome exclusion of both campuses from Green Belt.	2958/9338	University of York

Section 4: The Role of York's Green Belt

Paragraph etc	Comments and Objections	Ref.	Name
General	<p>Both Derwenthorpe and Germany Beck are large green belt developments and the recent University site is built on a green belt site of 65 hectares. This represents very significant loss of green belt areas in recent years as well as the loss of good quality agricultural land and valuable green infrastructure. CS is now proposing loss of further large tracts of green belt countryside that will further enlarge York's urban area.</p> <p>Policy CS5: identifies York's "compactness" as an asset of strategic importance to the special character and setting of York.</p> <p>The character and environment of the City is already being damaged by traffic congestion and poor air quality.</p> <p>The Arup Reports from which the growth levels have been derived do not take account of the fact that York is a compact historic city and that a key strategic objective is to protect York's unique character and setting. There is no evidence that the Council has calculated the overall impact of such growth on York's environment.</p> <p>CS fails to address fundamental issue of York's capacity to absorb high levels of growth proposed without causing irreparable harm to the historic character and setting of the City and to health and well being of its residents. Also silent on finite quantity of green belt within ring road and makes no reference to what might happen when all available land is used up.</p> <p>To north and west of City, where urban edge extends to ring road, the rural setting of the City has been irreparably damaged by the intrusion of harsh and unattractive urban views Strategic Objectives state that LDF will address the other purposes set out in PPG2.</p> <p>Apart from listing the purposes in 4.3, CS does not address role of York's green belt in terms of other purposes at all. E.g. areas of search have not been assessed for their role in safeguarding the countryside from encroachment, preventing urban sprawl and assisting in urban regeneration, all very relevant to York.</p> <p>Lack of opportunity for stakeholders to make representations on changes before decision was taken to include areas A1, A2 and B as urban extensions was so limited that normal democratic process was not applied. This was further compounded by fact that cross-party LDF Working Group did not meet to consider and vote on revised proposals.</p> <p>(Grounds Not Justified; Not Effective)</p>	70/8535 70/8536	Fulford Parish Council
	Green belt land and greenfield sites exist in Strensall/Towthorpe and clarification should be provided between these two descriptive terms.	85/8581	Strensall with Towthorpe Parish Council

Section 4: The Role of York's Green Belt Continued

Paragraph etc	Comments and Objections	Ref.	Name
General Continued	Paragraph 3.29 in Spatial Strategy states “only land within the ring road should be considered as suitable for areas of search for urban extensions relating to new residential communities”. There is no such statement in Section 4. This is inconsistent. Should form part of CS1. (Grounds Not Justified; Not Effective)	88/8600 88/8601	Wigginton Parish Council
	In terms of remaining settlements, other than Sub Regional City, within hierarchy would wish to state that these are subject to development limit/inner Green Belt boundary, which will determine extent of these settlements, and therefore capacity of those settlements to accommodate housing needs required. (Comment) Evidence at this time is not sufficient to support Council's assertion that no additional land is required within current Draft Green Belt and that additional land would only likely be required beyond initial ten years of plan. Council's evidence demonstrates that there would not be sufficient land within identified settlements and main urban area to meet housing targets within RSS. As such areas currently identified, as PAS should be, in whole or in part, considered at this time as suitable for removal from Draft Green Belt and inclusion as allocated for housing development as soon as LDF is adopted. Site at New Lane, Huntington should be considered for exclusion from Green Belt and allocated for housing development for following reasons: - Size of site is such that degree of encroachment would be limited; Site is located within a well defined area, and would effectively represent an extension to existing urban area within confines of a well established landscape belt; Identification of land between urban areas and Green Belt, and recognition of shortfall in housing supply from Urban Capacity Study must mean that encroachment into open areas is inevitable. Site does not contribute to setting of any villages and would make no positive contribution to a proposed Green Belt. (Object No grounds stated)	331/8953 331/8977	Taylor Wimpey (UK) Ltd
	A range and choice of safeguarded land sites should be identified using similar principles to those employed in identifying housing land. Object to the absence of any such policy in current version of CS, which is also unsound because of its failure to secure a permanent Green Belt. CS conflicts with National Policy. Because it will be incapable of responding flexibly to demand for development towards end of plan period it cannot be effective. (Grounds Not Effective; Not Consistent with National Policy)	2519/8714 2519/8715	Mr G W Procter

Section 4: The Role of York's Green Belt Continued

Paragraph etc	Comments and Objections	Ref.	Name
General Continued	Tight land use restrictions on either Northminster Business Park or Grimston Bar are unsound since this will constrain economic growth and does not accord with direction of travel of recent government policy. Figure 4 should be amended to replace Northminster Business Park with Grimston Bar. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2687/8730 2687/8731 2687/8732	Tangent Properties
	Text does not expressly confirm Areas of Search and associated open land have been removed from Green Belt. This needs to be inserted to avoid any confusion later. (Comment)	2689/9098	Monks Cross North Consortium
	Useful to clarify what 'development appropriate to purposes of Green Belt' would include ... e.g. would this cover renewable energy, if site was identified as having optimum potential for renewables such as high wind speeds? (Comment)	2898/9167	York Environment Forum
	To ensure that Green Belt boundaries, once defined, do not have to be altered, clear that safeguarded land should be provided. On similar principles to identification of housing land a range and choice of safeguarded land sites should be identified. Object to absence of any such policy in current version of CS. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2942/8821 2942/8822 2942/8823 2942/8824	DPP
	Inclusion of Search Area B will continue to undermine urban regeneration in York. Search Area B should be removed (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2965/9473 2965/9474 2965/9475	Osaldwick Parish Council & Meadlands Area Residents Association
Strategic Objective(s)	Inclusion of a time-scale for how permanent Green Belt is meant to be does not comply with national policy guidance. The "permanence" being suggested seems somewhat less than envisaged in national policy guidance. Should therefore delete "that will not need to be reviewed for at least 20 years"	242/8640	English Heritage Yorkshire and the Humber Region
	Too site specific and introducing issues that are not necessary when considering overall objective for Green Belt. Should be reworded as follows: "To set a permanent Green Belt for York that will not need to be reviewed for at least 20 years, which will preserve the setting of York. The Local Development Framework (LDF) will also address, within the York context, the other purposes set out in Planning Policy Guidance 2 (1995)" (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9261 2953/9262 2953/9263	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
	PPG2 and draft NPPF make it clear that Green Belt boundaries should ensure beyond plan period. Should be amended to refer to Green Belt enduring beyond 2031. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2959/9395 2959/9396 2959/9397 2959/9398	William Birch & Sons & Other Clients

Section 4: The Role of York's Green Belt Continued

Paragraph etc	Comments and Objections	Ref.	Name
Targets	No measure of whether or not the Green Belt is achieving its intended purpose. Add an additional Target along the following lines: - "No developments in the Green Belt which compromises its primary purpose"	242/8641	English Heritage Yorkshire and the Humber Region
Policy CS1	No basic summary of statistics provided. No statistics provided of how much green belt land has been lost since 1996. No environmental capacity study has been carried out. Alternatives to peripheral growth of main urban area have not been fully considered. (Grounds Not Legally Compliant; Not Effective) Unrealistic assumption that brownfield land will deliver numbers of homes and jobs within earlier years of plan given constraints on these sites. Developers could argue they need to bring forward areas A and B at an earlier stage. If land is deleted from green belt development will be inevitable. "Approach to Green Belt Appraisal 2003" not based on credible evidence as lacks detail and technical information and is not transparent in application of methodology, but maps are being used to determine primary constraints for all sites. Green Belt land is a finite resource, performs crucial function in preserving setting of City, contributes to air quality , assists in flood protection and promotes general well-being. It should be protected at all costs. (Grounds Not Legally Compliant; Not Effective Not Justified)	65/8471 65/8472 65/8471 65/8472 65/8476	Copmanthorpe Parish Council
	This policy has been altered and watered down from Preferred Options version of 2009 and is now much weaker. Para 1 states: "It also has a valuable role in conserving the countryside", appears to be added on for no apparent reason. Para 3: states that 'designated' small villages will be washed over. It is inconsistent to qualify small villages in this way because category is fully described in SP1 (iv) and includes smaller undesignated settlements that will also be washed over. Para 4: The plan lasts until 2031 and earliest possible date for adoption is 2012. Green belt will thus have a maximum lifespan of only 19 years, contrary to statement in 4.1 that it will endure for at least twenty years. (Grounds Not Justified; Not Effective)	70/8527 70/8528	Fulford Parish Council
	Any incursion within Green Belt not acceptable.	71/8393	Haxby Town Council
	Oppose future developments within draft green belt including areas of search A1 and A2. Huntington is already a large community and needs green belt to prevent undesired effects of urbanisation, deterioration of air quality and surface water drainage, increasing volumes of traffic and the general loss of open aspects. (Grounds Not Effective)	75/8568	Huntington Parish Council

Section 4: The Role of York's Green Belt Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS1 Continued	Introduction of 'Future Areas of Search for Urban Extensions' is unnecessary and 'Greenbelt' proposals should remain as outlined in Draft Local Plan (incorporating 4 th set of changes). (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	83/8350 83/8351 83/8352	Skelton Parish Council
	Present wording inconsistent with SP 3 (iv), which allows for small-scale non-strategic expansions of settlements for housing. Objects to policy in current form as it precludes development of sustainable Green Belt sites, which LPA has advocated in its evidence base as, needed to accommodate future growth requirements of LPA area. (Grounds Not Justified; Not Effective)	164/9500 164/9501	Hogg Builders (York) Ltd
	States that, "only very restricted types of development appropriate to the purposes of the Green Belt will be permitted". Neither policy, nor supporting text, spells out what these restrictions are.	165/8908	Home Builders Federation
	In setting boundaries of Green Belt there should be flexibility to both accommodate development requirements but also respond to changes in development needs caused for example by need for additional housing in life of plan. CS has underestimated need for land for development and additional areas of search or safeguarded land are required to provide some flexibility to accommodate additional housing requirements and to provide for contingency in event identified sources of housing in main urban area do not deliver. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	196/9679 196/9680 196/9681	York & North Yorkshire Chamber of Commerce
	Need to emphasise importance of surrounding villages in creating this setting for York. Add an additional function - to prevent coalescence, which is an important factor in preserving its setting. (Grounds Not Justified)	203/8612	Mrs J Hopton
	No necessity to identify other elements of national Green Belt Policy, which the York Green Belt may help to deliver. Delete in first paragraph: - "It also has a valuable role in conserving the countryside" Whilst Green Belt may assist in delivering Spatial Principles, the method by which its boundaries are identified is wholly separate from the Spatial Principles of CS. Policy needs to set out the basis on which Green Belt boundaries will be identified and LDF document where they will be set out. Amend the second Paragraph of Policy to read: - "The general extent of York's Green Belt, illustrated on the Key Diagram and detailed boundaries to be established through the Allocations DPD, will ensure that those elements that contribute to the special character and setting of York as set out in Policy CS5 are protected". Inclusion of a time-scale for the permanence of York Green Belt does not comply with national policy guidance. The "permanence" being suggested seems somewhat less than envisaged in national policy guidance. The end-date for the period within which the Green Belt is to endure should be deleted. Delete fourth Paragraph of Policy.	242/8642	English Heritage Yorkshire and the Humber Region

Section 4: The Role of York’s Green Belt Continued

Paragraph etc	Comments and Objections	Ref.	Name
<p>Policy CS1 Continued</p>	<p>Council has not demonstrated that it has considered opportunities for development beyond Green Belt in other local authority areas. Proposed Green Belt boundaries will not endure - CS states that proposed boundary will only last to 2031. There has been no longer-term assessment of development needs and assessment of level of development requirements during plan period is also flawed. It includes land, which does not need to be kept permanently open, and this risks future encroachment. Boundaries are drawn excessively tightly to built-up areas, which will render it impossible to maintain degree of permanence that Green Belts should have. Proposed boundaries make no provision for future local plans to make proper provision for further development. Does not promote sustainable patterns of development, as it is likely to increase in commuting to City from 5,000 net commuters to 21,000 many of which will be car based.</p> <p>CS states that LDF will create a permanent Green Belt for York that will endure until at least 2031. This is only 20 years and does not provide level of certainty that is required both by PPG2 and draft NPPF. A 20-year timespan is far short of permanence required. Dwelling requirement in Policy CS6 is unsound and therefore Green Belt boundaries that do not make sufficient provision for required level of housing are also unsound.</p> <p>Evidence base of CS does not consider longer-term development requirements of City. In considering Green Belt issues in Population Topic Paper there is no assessment of future development needs beyond plan period.</p> <p>No definition of what is meant by permanence in terms of PPG2 but it clearly means well beyond end of plan period. In other Green Belt areas inner boundaries have tended to endure without change for at least 40 years and therefore it is reasonable to consider level of development requirements for period to 2051 in terms of guidance in PPG2. Present proposed boundaries for Green Belt make no provision for safeguarded land because there has been no assessment of longer term development needs of City beyond 2031 for housing and 2029 for employment. Approach is contrary to guidance in PPG2 and emerging NPPF. Conclusion is that proposed Green Belt boundary does not make sufficient provision of housing development and most likely implication of this is increased in commuting and a less sustainable City.</p> <p>There are areas that have not been identified in Figure 3.2 which therefore are not required to be kept permanently open (including area at Clifton Moor) which can and should be considered in terms of either meeting need for housing in plan period or safeguarded land outside of Green Belt to meet development needs of City beyond 2031.</p> <p>(Suggested Changes to Policy detailed in representation). (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)</p>	<p>316/8932 316/8933 316/9176 316/9714 2970/9597 2970/9598 2970/9599 2970/9600</p>	<p>Hallam Land Management Ltd Commercial Estates Group</p>

Section 4: The Role of York's Green Belt Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS1 Continued	Policy should reflect more clearly appropriate forms of development within Green Belt as established within PPG2. (Comment)	331/8963	Taylor Wimpey (UK) Ltd
	Policy not flexible and is not most appropriate strategy for all sites outside of existing settlements, specifically North Selby site. Council recognises benefits of re-use of site for renewable/low carbon energy generation and associated uses at North Selby site. Allocation as a Major Developed Site in Green Belt would allow for such appropriate use of site. North Selby site, as a Major Developed Site in Green Belt would provide a more flexible supply of land for these uses without adding to impact on openness of Green Belt. Suggest adding at end "The former North Selby Mine site will be allocated as a Major Developed Sites in the Green Belt." (Grounds Not Justified; Not Effective)	515/9538 515/9539	Harworth Estates
	Not clear whether CS is as yet setting boundary of York Green Belt. Policy needs to make clear that extent of Green Belt will be defined in Allocations DPD and Key Diagram does not define Green Belt. (Grounds Not Justified)	546/9055	Miller Homes Ltd
	Green Belt in CS is treated as a residual policy, that is to say, with exception of 4 areas of search for potential long-term development, all currently undeveloped land is defined as lying within general extent of proposed Green Belt. By defining Green Belt residually, land is included which it is not necessary to keep permanently open for any of purposes of Green Belt. This is also contrary to PPG2. Once Yorkshire and Humber Plan has formally been deleted, all policies and proposals within Plan will no longer form part of statutory development plan. This means that current statutory basis for establishing general extent of Green Belt will disappear. If this happens before CS is adopted, the need for a Green Belt for York will have to be justified. CS should, but does not, provide strategic guidance for definition of detailed Green Belt boundaries at Allocations DPD stage. Green Belt is incorrectly used to achieve non-green belt purposes, specifically protection of landscape and avoidance of coalescence. This leads to a Green Belt, which is more extensive than it needs to be to meet proper Green Belt purposes. (Grounds Not Justified; Not Consistent with National Policy)	606/9564 606/9565	Jennifer Hubbard Planning Consultant

Section 4: The Role of York’s Green Belt Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS1 Continued	<p>Consultation results show that majority of residents believe that housing targets of 850 homes per year are too high, yet these remain in strategy. Results also show majority of residents opposed to identifying areas in draft green belt for development, yet strategy includes two such areas. Strategy must reflect views of the people who live in the City and must therefore be altered by reducing housing targets and retaining areas of search as green belt land. (Grounds Not Justified)</p>	<p>1132/8395 1277/8459 2910/8381 2911/8384 2916/8406 2917/8409 2918/8412 2919/8415 2920/8418 2922/8429 2923/8432 2924/8435 2925/8438 2926/8441 2928/8444 2929/8447 2930/8450 2937/8462 2968/9592</p>	<p>Mrs B S Hilton Mrs A Stafford W & C B Pawelee Mrs M P Rowntree Mr & Mrs J&M Teasdale K Richardson J Almond B R Ellis Mr & Mrs WP&J Legg Mrs V B Swaby Mr S Briggs AW & CB Dodd B & S Osborne J Nicholson C Summers/C Kennedy J A Wood M S Wood Ms L Stafford P & A Suffield</p>
	<p>Unrealistic in assuming that brownfield land will deliver the numbers of homes and jobs within the earlier years of the plan, given the considerable constraints on Sites A and B. If the assumptions are not reliable, developers could argue that they need to bring forward areas of search A & B at a much earlier stage in the Plan. Allocation of search areas A and B is unnecessary and puts draft Green Belt land at risk of development. Housing targets should be revised down to reflect the likelihood that the City will not grow as anticipated. This will allow areas of search A and B to be removed, making the plan more effective at prompting the use of Brownfield sites above Greenfield and will also respond to the wishes of York residents. (Grounds Not Effective)</p>	<p>2459/8707</p>	<p>Cllr C Runciman</p>
	<p>Land at Tadcaster Road would be a logical infill site having no impact on value of Green Belt. Neither justifiable nor effective to carry Green Belt Allocations from one Plan to another. Reviewing must be undertaken to ensure both land and Core Strategy Policies remain as effective as possible. (Grounds Not Justified; Not Effective) Land at Tadcaster Road does not meet objectives set out in PPG2. (Ground Not Consistent with National Policy)</p>	<p>2576/8425 2576/8426 2576/8427</p>	<p>Wilberforce Trust</p>

Section 4: The Role of York's Green Belt Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS1 Continued	Concerned that increased housing target will have environmental impacts on Green Belt and greenfield land, which surrounds the City Centre. Two Areas of Search (A2 & B) would potentially include use of agricultural land. Appears that land in Huntington, Heworth Without and Osbaldwick has been set aside to meet housing targets. Feels this will encourage developers to submit further planning applications for Green Belt and greenfield land. CS should be amended to ensure that all existing Green Belt land is protected through the LDF.	2726/8744	Mr J Sturdy MP
	Document was subject to major changes from that published in 2006, 2007 and 2009 without public consultation or debate at LDF working group. Disagrees entirely with inclusion of search area B as a site for housing development.	2881/8378	Cllr M Warters
	Objects to Monks Cross housing allocation as: - will add to congestion along northern section of Outer Ring Road; will increase car travel because housing is not linked to employment land provision; Monks Cross already faces additional traffic from existing employment land provision, the new stadium proposals and possible additional retail floorspace; unacceptable in environmental/Green Belt terms - and would adversely affecting residents amenities in that it would create another urban environment along northern Outer Ring Road.	2935/8793	Mr T Bennett
	Land in objector's ownership is suitable, available, achievable and deliverable for future residential development during plan period. It is located immediately adjacent to built up area of Acomb. Site should be deleted from Green Belt as located in sustainable location in close proximity to range of local services and facilities. Council should reassess site and acknowledge its suitability for potential release from Green Belt to help accommodate any necessary development required during plan period.	2936/9489	York Diocesan Board of Finance
	3 rd paragraph of Policy should be amended to make reference to Major Developed Sites. Insert after "Small Villages", "and Major Developed Sites...". (Grounds Not Effective)	2951/9207	York Designer Outlet
	York's Green Belt should not be equated any particular focus on protecting its historic character. Council acknowledge in SP3 need for expansion of Sub Regional City to meet future housing needs. Whilst support identification of expansion of York, concerned with timing of this release. Further outward expansion needs to be planned and identified in CS for release now to meet development needs, particularly for housing. Need to release a further strategic site. Policy should be significantly reworded. See representation for full text. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9264 2953/9265 2953/9266	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)

Section 4: The Role of York's Green Belt Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS1 Continued	<p>Policy attempts to introduce a new purpose for general extent of York Green Belt. Conserving countryside is not one of purposes of York Green Belt. Delete 2nd sentence of first paragraph.</p> <p>Policy does not provide sufficient protection in order to ensure Green Belt boundary will be permanent. Amend 4th paragraph to read "The general extent of the Green Belt and detailed boundaries will endure beyond the Plan period."</p> <p>Criteria should be introduced to set out guiding principles for determining inner boundary of York Green Belt. Any criteria should take into account need to: - protect the setting and character of the historic city ; only protect land which requires being kept permanently open; safeguard land for future development needs beyond the plan period.</p> <p>Figure 4.1 appears to suggest that villages are to be separated into two categories, those that are washed over by Green Belt and those, which are to be defined with a settlement hierarchy. This is inconsistent with SP1, Figure 3.1 and Policy, as these all treat Small Villages in same manner. CS should be amended so those villages not washed over by Green Belt are upgraded to be included within the "Village" category. Alternatively a new separate tier within settlement hierarchy for small villages not washed over by Green Belt, as shown on Figure 4.1 could be identified.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)</p>	2959/9399 2959/9400 2959/9401 2959/9402	William Birch & Sons & Other Clients
	<p>Identification of search area B not justified and dismisses 20 years of accepted Planning Inspectors and Council views as to value of this Green Belt land to setting of City. No evidence to support inclusion of Area B. Retention of land to east of Outgang Lane as a Green Belt Character Area further undermines Area B. Area B as a green wedge has great value to visual setting of City. Search Area B should be removed.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	2965/9470 2965/9471 2965/9472	Osballdwick Parish Council & Meadlands Area Residents Association
Explanation			
General	<p>Insert additional paragraph in Section 4 after paragraph 4.4: - "Annex C of PPG2 makes specific provision for the identification of substantial sites as 'Major Developed Sites' in the Green Belt. Around York, these include the following sites, the boundaries of which will be defined in the Allocations Development Plan Document: York Designer Centre [list MDS sites...]." (Grounds Not Effective)</p>	2951/9208	York Designer Outlet
Para 4.01	<p>The "permanence" being suggested for York Green Belt seems somewhat less than envisaged in national policy guidance. It would be preferable to delete a specific end-date for the period within which the Green Belt is to remain unchanged. In line 5 delete: - "In addition, that once set, the Green Belt will endure for at least twenty years".</p>	242/8643	English Heritage Yorkshire and the Humber Region

Section 4: The Role of York's Green Belt Continued

Paragraph etc	Comments and Objections	Ref.	Name
Explanation Continued			
Para 4.04	Should be amended to recognise existence of Village Design Statements and Parish Plans and that full consideration will be given to these documents when finalising CS. (Grounds Not Consistent with National Policy)	82/8420	Rufforth with Knapton PC
Figure 4.1	Incorporates some Green Belt areas into urban area without justification or public engagement. Inner Green Belt boundaries will be defined through Allocations DPD. Approach prejudices decisions of that DPD. Fordlands Road, Heslington, Heslington East and Germany Beck should be included within general extent of green belt until detailed inner boundaries are defined. (Grounds Not Justified; Not Effective)	70/8529 70/8530	Fulford Parish Council
	Objects to general extent of York's Green Belt. More precise Green Belt boundaries should be provided through Allocations DPD. If LPA wishes to retain diagram in document a note should be included clarifying that diagram is not intended to determine precise Green Belt boundaries and will be determined through Allocations DPD. (Grounds Not Justified)	164/9502	Hogg Builders (York) Ltd
	Figure 4.1 shows the location of the 'areas of search', which are located in the draft Green Belt, despite 60% of residents opposing identification of land in the Green Belt for development. The strategy therefore cannot be 'justified' as it ignores a fundamental part of the evidence base, namely the views of local people. (Grounds Not Effective)	2459/8702	Cllr C Runciman
	Suggest that generality of Green Belt are indicative only and do not reflect inner Green Belt boundary. In particular suggest that Green Belt boundary in vicinity of Knapton should follow A1237 ORR with general extent of land inside ORR designated as an "area of Search". (Grounds Not Justified; Not Consistent with National Policy)	2537/9621 2537/9622	Lancaster & Burneston Family
	Land at Moor Lane, Dringhouses is shown as being within Green Belt. Should be amended to exclude it. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9267 2953/9268 2953/9269	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
	Shows general extent of Green Belt and highlights villages that are washed over by it. These villages are designated on Key Diagram as Small Villages. However, Earswick, Stockton-on-the-Forest, Elvington and Wheldrake, are also annotated as settlements. Implication is that these will not be washed over but will instead be inset outwith Green Belt. Given statement of Policy CS1 that small villages will be washed over by Green Belt There is an inconsistency in approach to Small Villages that has not be fully considered or justified. Unclear what criteria have been used to determine which Small Villages are to be washed over by Green Belt and which are to be inset. Figure shows four Villages as settlements and it is therefore assumed that these are to be inset, but Plan is somewhat unclear. (Grounds Not Justified; Not Consistent with National Policy)	2957/9334 2957/9335	Mitchells & Butlers (Property) Ltd

Chapter 5 York City Centre

Paragraph etc	Supporting Comments	Ref.	Name
Strategic Objective(s)	Welcome especially intention to preserve and enhance special qualities and distinctiveness and unique legacy of historic assets.	242/8644	English Heritage Yorkshire and the Humber Region
Policy CS2 CS2 2 Achieving the following principles (i-x)	Support.	242/8645	English Heritage Yorkshire and the Humber Region
	Support idea of enhancing City Centre and gateways, creating strong evening economy and adding to City Centre's retail offer.	2932/8753	Matbo Limited
CS2 3 Delivering the enhancement and development of eight 'Areas of Change' (i-viii)	Support intention to revitalise streets, squares and spaces; increase extent of footstreets; proposal for public realm enhancements and proposal to revitalise environment of Micklegate and its connecting streets.	242/8646	English Heritage Yorkshire and the Humber Region
Explanation - Movement and Accessibility			
Paragraph 5.24	Commended together with proposed City Centre Movement and Accessibility Framework.	2898/9168	York Environment Forum
Paragraph 5.25	Supports and would like to see rivers used for strategic transport links.	2898/9169	York Environment Forum

Section 5: York City Centre

Paragraph etc	Comments and Objections	Ref.	Name
General	Speed Humps - speed/crossing humps etc., e.g. in Coppergate, serve no useful purpose other than to disfigure an historic street and damage passing vehicles. City Centre streets are so busy that there is no longer a requirement to slow down traffic. Warning signs - signs warning of restricted vehicular access, e.g. to Stonebow, Coppergate and Goodramgate, can only be described as monstrosities, due to their excessive size and continuous loud humming noise they make. The Goodramgate sign is incongruously close to historic buildings, including the Minster.	2912/8386	Mr C O Jilbert
	Need to clarify what distinguishes an area of change from the white areas on Figure 5.2 and what an area of change is. Figure 5.2 gives impression that white areas are of lesser importance. A more integrated and holistic approach needs to be applied.	2946/8871	The Garden & Landscape Heritage Trust
Policy CS2			
General	In addition to facilities that stay open, play space for children and young people should be included.	2944/8845	York Youth Council
1 Delivering the following quantum of development in the City Centre	Have reservations about scale of comparison retail floorspace identified for York Central site post 2020. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	196/9682 196/9683 196/9684	York & North Yorkshire Chamber of Commerce
1 Delivering the following quantum of development in the City Centre para iv.	Criterion iv states that provision of near 1000 new dwellings will be provided within the City Centre by 2031. Potential for non-delivery of this element of housing should be acknowledged. There is little market appetite for such a significant level of growth within City Centre. (Grounds Not Justified)	546/9056	Miller Homes Ltd
	Policy does not identify location of the 430 dwellings, their type, size or tenure. Lack any justification in terms of likely delivery. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9099 2689/9100 2689/9101 2689/9102	Monks Cross North Consortium
2 Achieving the Following Principles (i-x)	Says, "design streets around function" - but doesn't say what the function is (apart from not moving traffic around). A positive policy is needed to encourage events and activities in the City and to shape the streetscape around these events and activities.	551/8370	Constructive Individuals
	The policy should be more explicit in terms of provision of student accommodation being appropriate in the City Centre	2932/8754	Matbo Limited

Section 5: York City Centre Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS2 Continued			
3 Delivering the enhancement and development of eight 'Areas of Change' (i-viii)	Welcomes identification of eight areas of change but feels that Layerthorpe and York's Production Park area is not properly defined or justified. Some of eight areas identified are so large that funding institutions will be discouraged by scale of funding required to realise objectives for them. Strategy should clarify that smaller more fundable areas can come forward for development on a phased basis and that development of these areas is not an all or nothing scenario. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	196/9685 196/9686 196/9687	York & North Yorkshire Chamber of Commerce
	Strategy whose purpose is to set out a vision, strategic objectives targets and policies to guide where development goes in a way that will ensure the protection ... "does not seem to have particular vision, objectives, targets or policies e.g. housing quota, whose 800 figure is seen as more of an estimation than a min/max limit based on private development speculation; Castle Piccadilly site and others, which have been sought for development over many years but appear to be unfeasible without better development strategies; and the Heslington East swimming pool (which is touched on briefly and isn't part of a grand vision for York). (Grounds Not Justified)	2933/8779	Mr J Rose
3 Delivering the enhancement and development of eight 'Areas of Change' Para viii - Micklegate	Conflicts with current Council policy to develop enormous out-of-town shopping centre centres. These will take away yet further from an area that already receives below average footfall compared to other parts of City. Will have a direct negative impact upon shops in Micklegate and so aim to protect 'the retail and leisure offer' will not be met. Support statement as it stands as an aspiration, but it is undermined by Monks Cross proposals. (Grounds Not Effective)	458/9007	York Green Party (D Craghill)
	Conflicts with current council policy to develop enormous out-of-town shopping centres. These will take away further from an area that already receives below average footfall compared to other parts of City. This will have a direct negative impact upon shops in Micklegate and so, aim to protect retail and leisure offer will not be met. (Grounds Not Justified; Not Effective)	2949/9178 2949/9179	York Green Party (O Clayton)
Explanation			
Figure 5.2	Need to clarify what distinguishes an area of change from white areas on Figure 5.2 and what an area of change is. Figure gives impression that white areas are of lesser importance. A more integrated and holistic approach needs to be applied. If anything is at heart of City it must surely be Minster, and yet it is not included in Area of Change that is called Heart of the City. Another name should be found for this.	2946/8872	The Garden & Landscape Heritage Trust
Areas of Change i Heart of the City	If anything is at the heart of the City it must surely be the Minster, and yet it is not included in the Area of Change that is called Heart of the City. Another name should be found for this Area of Change.	2946/8873	The Garden & Landscape Heritage Trust

Section 5: York City Centre Continued

Paragraph etc	Comments and Objections	Ref.	Name
Explanation Continued			
Areas of Change viii Micklegate	Conflicts with current council policy to develop enormous out-of-town shopping centres. These will take away further from an area that already receives below average footfall compared to other parts of City. This will have a direct negative impact upon shops in Micklegate and so, aim to protect retail and leisure offer will not be met. (Grounds Not Justified; Not Effective)	2949/9180 2949/9181	York Green Party (O Clayton)
Movement and Accessibility Para 5.24 and 5.25	Lots of talk about pedestrian movement around heart of City but no mention of main obstacle at weekends/evenings - alcohol. Need to address role as stag/hen central, and impact that licensing and planning policy have.	551/8371	Constructive Individuals
Movement and Accessibility Paragraph 5.25	Last sentence of paragraph 5.25 needs clarifying. Idea of improving links and accessibility to City Walls should not be restricted to Areas of Change and should apply throughout City Centre.	2946/8874	The Garden & Landscape Heritage Trust

Chapter 6 York Northwest

Paragraph etc	Supporting Comments	Ref.	Name
York Northwest Corridor			
Paragraph 6.02	Support recognition that York Northwest corridor represents largest and most significant area of regeneration. Also support distinction between the two strategic allocations.	525/9037	Associated British Foods plc
Paragraph 6.03	Support.	242/8648	English Heritage Yorkshire and the Humber Region
	Supports.	2898/9171	York Environment Forum
Paragraph 6.05	Welcomed.	242/8649	English Heritage Yorkshire and the Humber Region
Paragraph 6.06	Welcome reference to transport masterplan.	525/9038	Associated British Foods plc
Strategic Objective(s)	Support intention to deliver in a way which preserves and enhances heritage assets.	242/8647	English Heritage Yorkshire and the Humber Region
	Supports.	2898/9170	York Environment Forum
York Central Strategic Allocation			
Policy CS3	Support inclusion of requirement to develop as a place of outstanding quality and design complementing and enhancing existing historic urban fabric of City.	242/8650	English Heritage Yorkshire and the Humber Region
Former British Sugar / Manor School Strategic Allocation			
Targets	Welcome and support 1 st target.	525/9028	Associated British Foods plc
Policy CS4	Support inclusion of former Manor School site within former British Sugar/Manor School Strategic Allocation. Also welcome inclusion of wording “around 1295 dwellings”.	525/9026	Associated British Foods plc
Explanation Paragraph 6.18	Welcomes suggestion that tram-trains be considered for this site and agrees with designing in halts at commencement of project.	2898/9173	York Environment Forum

Section 6: York Northwest

Paragraph etc	Comments and Objections	Ref.	Name
York Northwest Corridor			
Figure 6.1	Gillygate, Lord Mayor's Walk, York St John University and Dean's Park should be included in City Centre AAP boundary. Need to identify road shown as thick brown line that links station to Bootham and Clifton. Looks as if it passes through Museum Gardens.	2946/8875	The Garden & Landscape Heritage Trust
Para 6.05	Wider York Northwest corridor includes Green Belt. Paragraph makes no reference to this. Add at end of paragraph "taking due regard to Green Belt within the corridor". (Grounds Not Justified)	203/8613	Mrs J Hopton
	Regeneration of both sites should be bought forward together if at all possible but should not be a formal planning requirement. No evidence in or supporting CS to justify this requirement. (Comment)	525/9027	Associated British Foods plc
York Central Strategic Allocation			
General	Inclusion of Search Area B will continue to undermine urban regeneration in York. York central has stood idle whilst Council has promoted Green Belt development at Osbaldwick and Fulford. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2965/9476 2965/9477 2965/9478	Osbaldwick Parish Council & Meadlands Area Residents Association
Policy CS3	Cycling and walking facilities should be employed alongside River Ouse as part of York Central site. (Comment)	79/8486	Nether Poppleton Parish Council
	Evidence base used to define quantum of development proposed not robust and insufficient to demonstrate that site can deliver scale of development within timescales envisaged. (Grounds Not Justified)	164/9503	Hogg Builders (York) Ltd
	Concerned at risk to deliverability of scale of development envisaged for corridor in timescale indicated and absence of any contingency to accommodate development elsewhere in that event. Question whether York Central site can physically accommodate up to 100,000 sq m of office space; up to 25,000sqm of retail and 1,165 dwellings in addition to culture, leisure, tourism facilities and open space. CS should identify what alternatives can be provided in event development does not happen in York Northwest corridor in timescale envisaged. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	196/9688 196/9689 196/9690	York & North Yorkshire Chamber of Commerce
	Welcome reference to sport under targets section. Any new sports facilities should be strategically planned by robust and up to date evidence. (Comment)	398/8995	Sport England
	Urge caution in its reliance to deliver scale of development envisaged within Plan period to 2031. Site has been proposed for development for a considerable period of time and has yet to deliver development of any meaningful scale. It has major challenges to its delivery. (Comment)	546/9057	Miller Homes Ltd

Section 6: York Northwest Continued

Paragraph etc	Comments and Objections	Ref.	Name
<p>Policy CS3 Continued</p>	<p>May not be deliverable in current economic climate (short to medium term) if there is no demand for housing, which is to be created. Apparent from Draft Infrastructure Delivery Plan that both sites will require significant remediation and infrastructure provision to enable delivery. Question whether sites are deliverable and with it a central component of CS. Council should be identifying a number of alternative greenfield sites, which can deliver that growth. Suggest that land at Northfield and at Oakwood Farm provides such an alternative. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	<p>2537/9625 2537/9626 2537/9627</p>	<p>Lancaster & Burneston Family</p>
	<p>In addition to facilities that stay open, play space for children and young people should be included.</p>	<p>2944/8846</p>	<p>York Youth Council</p>
	<p>States that site will provide 'associated social infrastructure to meet the needs of the development', not for City as a whole. Furthermore, states that this development will be long-term (paragraph 6.13), so it is unclear if and when such facilities will be available. Either above sentences need to guarantee that there are enough primary school places for York in its entirety, or else new developments that do make such a guarantee will have to be found. (Grounds Not Effective)</p>	<p>2949/9183</p>	<p>York Green Party (O Clayton)</p>
	<p>Not convinced that area will deliver anticipated scale of development in LDF period. Council needs to reconsider overall strategy for releasing further land, to ensure that it has a rolling five year supply of deliverable land through emerging plan period. Should be reference to what is likely to be delivered by 2031. Consider that it could be 700 dwellings. Principles of development listed are deleted as this is pre-empting consultation process on SPD and not considered necessary to be included within policy. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	<p>2953/9273 2953/9274 2953/9275</p>	<p>Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)</p>
<p>Former British Sugar/Manor School Strategic Allocation</p>			
<p>General</p>	<p>Poppleton substation has an important role to play in maintaining supply of electricity to local distribution network operator and therefore ultimately to homes and businesses throughout York and wider area. Site is therefore "Operational Land" and there may need to be further essential utility development at site in future. In addition, high voltage overhead electricity transmission line routed via Poppleton substation crosses through a small part of north of site. Potential developers of sites should be aware that it is National Grid policy to retain existing overhead lines in-situ. Therefore advise developers and planning authorities to take into account location and nature of existing electricity transmission equipment when planning developments. Prefers that buildings are not built directly beneath overhead lines. Statutory safety clearances between overhead lines, ground, and built structures must not be infringed. Seeks to encourage high quality and well-planned development in vicinity of its high voltage overhead lines. (Comment)</p>	<p>2734/9148</p>	<p>National Grid</p>

Section 6: York Northwest Continued

Paragraph etc	Comments and Objections	Ref.	Name
Former British Sugar/Manor School Strategic Allocation Continued			
Targets	Object to inclusion of specific quantum of gross floorspace for retail, services and food and drink uses within CS. These will most appropriately be determined through undertaking of a detailed assessment of retail capacity, need and impact as part of masterplanning and planning application exercises. Proposed level of detailed control is inappropriate for CS and not justified by evidence base. (Grounds Not Justified)	525/9029	Associated British Foods plc
Policy CS4	Reservations on transport links for these sites. Object to use of Millfield Lane for this development. Access should be via Great North Way. (Object No Grounds Stated) Cycling and walking facilities should be employed alongside River Ouse as part of site. (Comment)	79/8573 79/8574	Nether Poppleton Parish Council
	Serious concerns about vehicular access. Access via Millfield Lane would be wholly inappropriate and recommend access via Great North Way with a bridge over the York to Harrogate railway line should be made a requirement for any development on this site.	86/8592	Upper Poppleton Parish Council
	Evidence base used to define quantum of development proposed not robust and insufficient to demonstrate that site can deliver scale of development within timescales envisaged. (Grounds Not Justified)	164/9504	Hogg Builders (York) Ltd
	Main concerns relate to risk to deliverability of scale of development envisaged for corridor in timescale indicated and absence of any contingency to accommodate development elsewhere in that event. CS should identify what alternatives can be provided in event development does not happen in York Northwest corridor in timescale envisaged. No evidence of deliverability of a viable scheme to Eco Towns standards on site. Policy should therefore include a specific reference to viability of development in context of Eco Towns requirement. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	196/9691 196/9692 196/9693	York & North Yorkshire Chamber of Commerce
	Site includes playing fields at both school site and factory site. Reference should be made to this and, work Sport England have advocated, needs to be done by developer to comply with playing fields policy exception E1. Policy needs to reflect requirements to replace playing fields that would be lost at factory site or demonstrate as per E1 that are surplus to requirements. Propose an additional criterion after X under ‘the principles of development’ to cover requirements to protect or replace significant on site playing fields. Suggest this section is redrafted so as it is not overtaken by events. Site is not wholly brownfield.	398/8996	Sport England

Section 6: York Northwest Continued

Paragraph etc	Comments and Objections	Ref.	Name
Former British Sugar/Manor School Strategic Allocation Continued			
Policy CS4 Continued	<p>ix) Suggest that word 'reasonably' be added between words 'as many trips as' and 'possible', to provide appropriate recognition at this stage of planning process of future need for flexibility in assessing potential conflicting or competing objectives.</p> <p>x) Suggest inclusion of wording 'as far as is reasonably practicable' between 'minimise' and 'the environmental impact of vehicle trips', for same reason as set out for ix.</p> <p>In final paragraph on page 52, replace word 'complementary' with 'comprehensive'. (Comment)</p>	525/9035	Associated British Foods plc continued
	Urge caution in reliance on site to deliver scale of development envisaged within Plan period to 2031. Site has been proposed for development for some time. It has major challenges to its delivery and specific requirements within policy. (Comment)	546/9058	Miller Homes Ltd
	May not be deliverable in current economic climate (short to medium term) if there is no demand for housing, which is to be created. Apparent from Draft Infrastructure Delivery Plan that both sites will require significant remediation and infrastructure provision to enable delivery. Question whether sites are deliverable and with it a central component of CS. Council should be identifying a number of alternative greenfield sites, which can deliver that growth. Suggest that land at Northfield and at Oakwood Farm provides such an alternative. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2537/9628 2537/9629 2537/9630	Lancaster & Burneston Family
	Propose inclusion of Skate Park to west of the City in the Acomb area/North West Corridor. Development here offers ideal opportunity to increase leisure opportunities in the area and provide the Skate Park being asked for by local children.	2943/8841	Carr Junior School Safe Skate Committee
	States that development must have 'Provision of around 1,295 dwellings and associated social infrastructure to meet the needs of the development' and that it will 'ensure that social infrastructure requirements of the new community are met through provision of facilities and services'. Suggests that new educational services will be found for new housing at sites. Does not say this will guarantee that there are sufficient primary school places for City as a whole. Either above sentences need to guarantee this, or else new developments that do make such a guarantee will have to be found. (Grounds Not Effective)	2949/9184	York Green Party (O Clayton)
	Not convinced that area will deliver anticipated scale of development in LDF period. Council needs to reconsider overall strategy for releasing further land, to ensure that it has a rolling five year supply of deliverable land through emerging plan period. Should be reference to what is likely to be delivered by 2031. Consider that it could be 750 dwellings. Principles of development listed are deleted as this is pre-empting consultation process on SPD and not considered necessary to be included within policy. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9276 2953/9277 2953/9278	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)

Section 6: York Northwest Continued

Paragraph etc	Comments and Objections	Ref.	Name
Former British Sugar/Manor School Strategic Allocation Continued			
Explanation			
Para 6.16	British Sugar/Manor School site gives an opportunity to build and to design family homes as exemplar sustainable dwellings for 21 st century. Capacity to adopt renewable energy must be built in and technology made easy to install. (Comment)	2898/9172	York Environment Forum
Para 6.17	Object to inclusion of specific quantum of gross floorspace for retail, services and food and drink uses within CS. These will most appropriately be determined through undertaking of a detailed assessment of retail capacity, need and impact as part of masterplanning and planning application exercises. Proposed level of detailed control is inappropriate for CS and not justified by evidence base. Suggest that wording is replaced with: - 'Study work on future convenience retail provision within the City has shown that there is likely to be a need for retailing and service facilities within the site. The scale and nature of new retail, services and food and drink floorspace which may be appropriate on site will be determined by a detailed assessment of retail capacity, need and impact prepared as part of the masterplanning and planning application process. The new facilities may include a local food store to provide for local day-to-day shopping needs. The most appropriate location for new retail facilities on site should be determined through the masterplanning process.' (Grounds Not Justified)	525/9031	Associated British Foods plc
Para 6.18	Inappropriate that provision for tram-train, either in terms of reserved land or financial contributions, should form a planning requirement within CS. In addition financial contributions towards tram-train, or indeed any other form of public transport infrastructure, should be assessed as part of a detailed transport assessment in support of planning application for redevelopment of site. Whilst opportunities to link to areas adjoining Strategic Allocation could be considered, such linkages should not be a pre-requisite of planning policy for site. Suggest following alternative wording: - "Due to known constraints on the highway network a highly sustainable approach to movement and transport provision will be necessary. Tram-train could offer an important public transport link between the site and the wider region. As a result of the long-term nature of this project, appropriately located land for tram-train halt facilities could be reserved as part of the development and incorporated into the wider phased approach to sustainable transport through the masterplanning process. This could also consider the opportunities to link to areas adjoining the Strategic Allocation."	525/9036	Associated British Foods plc

Chapter 7 York's Special Historic and Built Environment

Paragraph etc	Supporting Comments	Ref.	Name
Strategic Objective(s)	Support.	242/8652	English Heritage Yorkshire and the Humber Region
Policy CS5	Strongly support.	79/8575	Nether Poppleton Parish Council
	Upper Poppleton Conservation Area must be preserved and use of Village Design Statements and Parish Plans strongly supported.	86/8593	Upper Poppleton Parish Council
	Wholeheartedly support.	242/8655	English Heritage Yorkshire and the Humber Region
Policy CS5 Paragraph ii	Welcomes reference to not compromising views of Minster on skyline and protecting Green Belt.	1965/9572	Ms D Marsh

Section 7: York’s Special Historic and Built Environment

Paragraph etc	Comments and Objections	Ref.	Name
General	As DPD states that the protection of those elements, which contribute to the special character of the City, underpins the whole strategy of the plan, it would be more logical to locate this Section after the Vision. (Comment)	242/8651	English Heritage Yorkshire and the Humber Region
	Fails to address fundamental issue of York’s capacity to absorb proposed levels of growth without causing irreparable harm to historic character and setting of City. (Grounds Not Justified; Not Effective; Not Legally Compliant)	65/8483 65/8484 65/8485	Copmanthorpe Parish Council
	Concerned that section and Policy CS5 attempt to cover matters addressed in other parts of plan e.g. CO2 reductions. Lacks necessary clarity required to appropriately direct location of development. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9103 2689/9104 2689/9105 2689/9106	Monks Cross North Consortium
	Term “Special Historic and Built Environment” should be changed to “Special Environmental and Archaeological Heritage” because it includes other heritage assets such as green infrastructure.	2946/8863	The Garden & Landscape Heritage Trust
Targets	Outcomes proposed all relate to tools for management of historic environment rather than actually monitoring what is happening. Therefore, include a target(s), which actually relate to the condition of those assets, which have been identified as contributing to special historic character, and setting of York. Add an additional target along the following lines: - “To what extent the six Principal Characteristics which contribute to the special character and setting of York have been safeguarded, enhanced or better revealed”.(Object No Grounds Stated)	242/8653	English Heritage Yorkshire and the Humber Region
	Mention should also be made to the proposed York Historic Environment Characterisation Programme Project, which will, to a large extent, tie together the documents set out in this Section. Add the following to the Targets: - “Completion of the York Historic Environment Characterisation Programme Project by 2012”. (Comment)	242/8654	
Policy CS5	Fails to mention contribution of villages that have been incorporated into urban area over time and those villages at the urban fringe with conservation areas such as Fulford, Heslington and Osbaldwick. (Grounds Not Justified; Not Effective)	70/8531 70/8532	Fulford Parish Council
	Core Strategy should recognise and incorporate all Village Design Statements previously approved by Council as Interim Planning Statements or Supplementary Planning Documents. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	83/8353 83/8354 83/8355	Skelton Parish Council

Section 7: York's Special Historic and Built Environment Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS5 Continued	Policy specifies that developments will be 'supported' where they have reference to "current or emerging contextual guidance". However Council also states that such guidance has not yet been published. Also refers to a range of more local guidance that has yet to be produced, but which developers will be required to refer to. Development cannot be delayed until such documents are published. This must be made clear in policy. The use of SPDs to introduce new policy outside of CS is also contrary to direction of national planning policy as set out in draft NPPF, which discourages use of SPDs to introduce un-tested policy. (Grounds Not Consistent with National Policy)	165/8909	Home Builders Federation
	The aspects of York's character set out in the bullet-points at the bottom of Page 56 are not "assets" as such. It would be more appropriate to delete this term in the first line.	242/8656	English Heritage Yorkshire and the Humber Region
	Concerned that section and Policy CS5 attempt to cover matters addressed in other parts of plan e.g. CO2 reductions. Lacks necessary clarity required to appropriately direct location of development. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9107 2689/9108 2689/9109 2689/9110	Monks Cross North Consortium
	Historical features should not preclude possibility of sensitively updating and retrofitting old buildings so that they are less draughty and better insulated and capable of generating renewable energy. (Comment)	2898/9174	York Environment Forum
	Regarding criterion ii d) seek some flexibility, as it is not always possible or appropriate to provide amenity space in centre of city where there is a tight urban grain and parking requirements.	2932/8755	Matbo Limited
	Unnecessarily long and needs to be streamlined to ensure that it only includes text which will assist in guiding development. First three paragraphs should be removed and inserted into Explanation. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9279 2953/9280 2953/9281	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)

Chapter 8 Housing Growth and Distribution

Paragraph etc	Supporting Comments	Ref.	Name
General	Welcome housing target being increased to 800 per annum over plan period.	13/8892	Ryedale District Council
	Welcome further work undertaken to review evidence on targets in particular consideration of RSS targets and more recent CLG projections.	16/8497	Selby District Council
Policy CS6	Support.	79/8578	Nether Poppleton Parish Council

Section 8: Housing Growth and Distribution

Paragraph etc	Comments and Objections	Ref.	Name
General	Have concerns if there were any barriers relating to delivery of level of housing. However note that housing target is stepped up after 2015-16 reflecting state of economy and need to step up delivery of housing. (Comment)	13/8893	Ryedale District Council
	Concerned that if York is being over cautious leading to under provision in plan period this will lead to pressure on Selby.	16/8498	Selby District Council
	Challenge soundness of some of the forecasts used. Consider population forecasts should be subjected to more robust scrutiny. On housing assessments provision made for 16000 dwellings in next 20 years, in last 10 years 6924 were completed and only 1995 in last 5 years. Realism of forecast must be challenged. Nothing in CS, which proposes a solution to absence of funding to address decline in publicly funded affordable completions. (Grounds Not Justified)	55/8466	CPRE (York and Selby District)
	Lack of opportunity for stakeholders to make representations on changes before decision was taken to include areas A1, A2 and B as urban extensions was so limited that normal democratic process was not applied. This was further compounded by fact that cross-party LDF Working Group did not meet to consider and vote on revised proposals. (Grounds Not Justified; Not Effective)	70/8537 70/8538	Fulford Parish Council
	With revocation of RSS pending, Council can no longer assume that other authorities in sub-region will plan to accommodate their own household growth let alone York's unmet need. CS is unsound in this crucial aspect as it is not in conformity with national planning policy requirements as expressed in <i>Planning for Growth</i> and draft NPPF to work with adjoining councils to strategic and assess cross-boundary issues. (Grounds Not Effective; Not Consistent with National Policy)	165/8914 165/8915	Home Builders Federation
	Planned under provision of housing in York will exacerbate already critical situation with regard to provision of housing within this connected housing market area. Failure to cooperate and address issues such as migration and cross boundary needs renders housing element of CS unsound. (Grounds Not Effective; Not Legally Compliant)	316/8944 316/8936 2960/9435 2960/9730 2961/9448 2961/9731 2970/9609 2970/9610	Hallam Land Management Ltd Taylor Wimpey Redrow Homes Commercial Estates Group

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
General Continued	Some flexibility should be introduced regarding allowing windfall development outside outlined areas within large villages and villages in south of District, perhaps towards end of plan period to ensure that present scenario of an unbalanced distribution of housing is not repeated; Council's desire for 87% of new housing to be located in main urban area should be readdressed to ensure that it is a realistic and achievable figure.	568/8672	The Land and Development Practice Continued
	Concerned about assumptions made for projections for number of houses that will be required over the planning period. They were made against a much rosier economic background. Moreover, some data used seems to be historic. E.g. those for migration are based on data gathered 10-20 years ago, under very different economic circumstances.	2178/8698	Murton Parish Council
	<p>Fails to follow principles set out in SP1. Appears to preclude the development of any form of greenfield site in any location other than in the city itself or in the identified major urban expansion sites.</p> <p>Appears to give too much weight to the delivery of the identified "Major Development Opportunity" sites. All have been available for some considerable period of time and have not been developed. Furthermore, wrong to assume that the resultant shortfall in housing land can be made up by other sites within York itself and by brownfield sites in the "Large Villages" and "Villages". There will need to be an early release of suitable additional land for development and this should be reflected in this policy.</p> <p>In order to meet the District's housing need and to provide a range and choice of housing sites it is essential that appropriate opportunities for the development of greenfield sites together with the limited expansion of certain Local Service Centres and Villages are identified. Reference should be made to the possible development of greenfield land both within, and on the edge of, such settlements.</p> <p>(Grounds Not Justified)</p> <p>Housing growth is substantial but nonetheless, significantly underestimates the real level of need. The requirement in RSS is for 850 new dwellings per annum, which is significantly greater than the level proposed in the CS. RSS figure is out of date however.</p> <p>Office for National Statistics 2008 household projections for the period up to 2033 estimate that the average annual housing requirement for York will be 1250 additional units per annum. The data provided by the NHUAW and the ONS is the most up to date and represents the true level of housing need.</p>	<p>2519/8716</p> <p>2519/8716 2519/8717 2519/8718</p>	Mr G W Procter

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
<p>General Continued</p>	<p>Concerned about proposal to deliver an average of only 635 dwellings per annum between 2011/12 and 2015/16. No justification for seeking to significantly underprovide for the District's housing needs in the early years of plan period as this will simply exacerbate housing shortage problem.</p> <p>Housing shortage in York will only be made worse if "Major Development Opportunity sites" are not developed. Disputes assertion that 3,967 dwellings, which benefit from unimplemented planning consents will be delivered.</p> <p>This figure-should be either completely discounted or significantly reduced.</p> <p>Strategy still believes that apartments will contribute up to 30% of new units to be delivered. But doubts whether market will deliver even this reduced contribution.</p> <p>PPS3 is clear that no allowance should be made for windfall development unless robust evidence is provided of genuine local circumstances, which prevents other sites being identified. The fact that historically, windfall sites have come forward is not a reason to include an allowance for them. A housing contribution from windfall sites should therefore be deleted.</p> <p>Housing requirement calculation is not based upon up to date information and assumptions underpinning the projected requirements are incorrect. Methodology employed to arrive at figures for delivery of housing numbers from key sites and allocations relied upon is flawed. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	<p>2519/8716 2519/8717 2519/8718</p>	<p>Mr G W Procter Continued</p>
	<p>York must build in local resilience, particularly with regard to future developments, new housing and infrastructure changes and effect these will have on lives of residents. Should be planning for transition to an economy that is not reliant on fossil fuels. While there is some discussion of potential for renewable energy and a commitment to building 'urban eco settlements', a citywide approach is necessary to ensure that York is attractive, secure, flourishing and resilient in years to come. (Comment)</p> <p>Given changes in transport, building, heating, energy generation and resource use targets for reduction in CO2 emissions require, question whether other aspects of CS, notably target for housing and emphasis on growth have taken this into account.</p> <p>If 16000 new dwellings were all to be occupied by people driving at least one car, plans for York's transport will fail.</p> <p>(Object No Grounds stated)</p>	<p>2898/9150 2898/9158</p>	<p>York Environment Forum</p>

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
General Continued	<p>Whilst housing growth is substantial, significantly underestimates real level of need. RSS figure for period 2008 - 2026 is for 850 new dwellings per annum, which is significantly greater than level proposed. However RSS figure is out of date. National Housing and Planning Advice Unit and the Office for National Statistics provide more up to date data. ONS 2008 based household projections for period to 2033 estimates that the annual average housing requirement for York is 1250 additional units per year. Most recent data on housing need for York is therefore substantially above that proposed and clear that York are proposing to under provide for level of housing need.</p> <p>Serious concerns relating to proposal to only provide an average of 635 dwellings per year between 2011/12 and 2015/16, based on perceived ability of development industry to deliver new housing rather than need. No justification for seeking to significantly under provide for housing needs in early years of plan period. One way to increase delivery in early years is to release additional sites throughout district and not just on brownfield sites within city (including land within villages).</p> <p>Housing crisis in York will be further exacerbated if “major development opportunity sites” do not come forward as anticipated. As these sites are constrained with high infrastructure cost and many of them reliant on a significant element of flatted development, delivery from these sites must be questioned.</p> <p>Dispute assertion that 3,967 dwellings, which benefit from unimplemented planning consents, will be delivered. Figure should be discounted or significantly reduced.</p> <p>No allowance should be made for windfall development unless robust evidence of genuine local circumstances, which prevents sites being identified, is provided. Fact that historically windfall has come forward is not a reason to include an allowance.</p> <p>As Local Planning Authority has not sought to analyse potential contribution from small sites, does not know what land is available now and therefore can have no precise idea of availability of potential windfall opportunities. Housing contribution from windfall sites should therefore be deleted.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)</p>	2942/8825 2942/8826 2942/8827 2942/8828	DPP
Strategic Objectives	<p>Rigidly requiring development to be carried out in accordance with SP2 and 3 could prove insufficiently flexible to ensure delivery of plan and its objectives. Draft NPPF requires authorities to provide households with opportunity to live in a community where they want to live. Choking-off land supply in some locations to concentrate all development activity solely in City and Urban Centres would fail to address needs of these other households.</p> <p>(Grounds Not Justified; Not Effective)</p>	165/8910 165/8911	Home Builders Federation

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
Targets	<p>Unconvinced by rationale for setting a lower target for period 2011-2016 before raising this post-2016. Overall requirement should be averaged out over plan period so that annual average becomes 800 net additions per year (assuming a target of 16,000). Council states that lower target for 2011-16 is to take into account impact of recession. Delivery can be assisted in various ways and there are many positive planning measures that could be adopted to assist delivery, including increasing number of sales outlets in a variety of locations across district to meet demand of households in different locations. Council's data shows that over last ten years completions have averaged 720 dwellings per year, and 560 per year for last five years. While last five years reflect recession years, this has also been a period when York has been without a CS that can underpin investment decisions and provide certainty for developers. 560 net additions is still a healthy figure and indicate popularity of York and its relative economic vibrancy. Number of completions can easily exceed 635 and match 800 per year so long as planning policy environment is realistic and supportive of development.</p> <p>(Grounds Not Justified)</p>	165/8912	Home Builders Federation
	<p>Approach to determining requirements for development during plan period does not accord with PPS3 for following reasons: -</p> <p>Not in accordance with RSS, which requires a provision of 850 dwellings a year for plan period and would result in 17,000 dwellings if extended to 2031.</p> <p>Not in accordance with emerging Localism Bill and draft NPPF as it does not take into account: - most recent household projections which would suggest a requirement of 1,277 dwellings a year, migration, findings of SHMA which suggest an annual requirement of 982 dwellings per year, most recent evidence on future housing demand, migration and impact of adopted policy and make provision for unmet housing demand in a neighbouring authorities.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)</p>	316/8941 316/8942 316/8943 316/8935 2960/9427 2960/9428 2960/9429 2960/9430 2961/9440 2961/9441 2961/9442 2961/9443 2970/9605 2970/9606 2970/9607 2970/9608	Hallam Land Management Ltd Taylor Wimpey Redrow Homes Commercial Estates Group

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
Targets Continued	Current Council projections indicate that such an increase in housing will mean that York will not have enough primary school places for its children. Other paragraphs in CS suggest that new educational services will be found for new housing at British Sugar/Manor School sites. It does not say that this will guarantee there are sufficient primary school places for City as a whole. Either housing numbers need to be reduced or plan needs to make proper provision for increased demand for school places. (Grounds Not Effective)	458/9008	York Green Party (D Craghill)
	Targets should be amended as follows: 2011/12 - 2015/16 - 1299 net additional dwellings per year; and 2016/17 - 2030/31 - 1250 net additional dwellings per year. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9285 2953/9286 2953/9287	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
	Council has looked to determine whether RSS housing target is still appropriate. At this point in time, this approach is unsound. Housing target should be increased in order to deliver sufficient new homes in line with 2008 CLG household projections and expressed as an annual average for life of Plan, rather than providing for a step up in delivery in 2016. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2959/9403 2959/9404 2959/9405 2959/9406	William Birch & Sons & Other Clients
Policy CS6	Concerned about flexibility of planning for York to ensure that long term development needs can be met, without adversely impacting on neighbouring parts of Hambleton District lying outside Green Belt. Would be useful to identify 'safeguarded land' to meet longer term needs, stretching well beyond plan period, in accordance with draft National Planning Policy Framework and PPG2. The identified Areas of Search are required for plan period and from current discussions only appear to provide for approximately a 2.5 year over supply of housing. (Comment)	14/8895	Hambleton District Council
	Unrealistic assumption that brownfield land will deliver numbers of homes and jobs within earlier years of plan given constraints on these sites. Developers could argue they need to bring forward areas A and B at an earlier stage. If land is deleted from Green Belt development will be inevitable. Housing quotas proposed not justified by data to explain what proportions are needed to satisfy housing shortages, anticipated growth requirements for existing population and accommodating any planned or anticipated net inward migration. No justification as to why quotas and housing numbers/densities have been increased significantly since last version of document. (Grounds Not Justified; Not Effective; Not Legally Compliant)	65/8477 65/8478 65/8479	Copmanthorpe Parish Council

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS6 Continued	Numbers are unrealistic when considered against background of economic recession and historic completions; Arup reports do not take account of environmental limits; no longer appropriate for York to be considered a key economic driver for the region; numbers of completions in earlier stage of Plan are over-estimated; if any of identified brownfield sites are delayed or prove undeliverable, pressure to achieve rolling supply of housing will cause Green Belt areas identified for urban expansions to be brought forward at an earlier stage; proposed rate of housing provision incompatible with over-riding planning objective for City. (Grounds Not Justified; Not Effective)	70/8533 70/8534	Fulford Parish Council
	Unconvinced by forecast of population growth, which underpins proposals for allocating land for housing because of economic situation and changing composition of households.	73/8564	Heworth Without Parish Council
	Provision made of 16000 dwellings needs to have added to it:- to meet a much increased job creation target of say 2000 per annum (noting some will be filled by inward commuting); to forego any plans for other than very small windfall sites for residential development on Green Belt land outside the A64/A1237 ring road. (Grounds Not Effective)	88/8607	Wigginton Parish Council
	Proposed requirement: - Is not founded on a robust and credible evidence base involving research and fact finding; Is not in accordance with RSS, which requires a provision of 850 dwellings a year for plan period, which would result in 17,000 dwellings if extended to 2031; Is not in accordance with emerging Localism Bill and Government's Growth Agenda contained within draft NPPF as it is not flexible in accommodating additional growth: Does not consider most recent household projections. Council should be planning to make provision for a higher housing requirement based on more up to date CLG 2008 and 2010 based population projections, a more realistic approach to migration and economic growth of City. Is significantly less than SHMA findings; Is not based on most recent evidence on future housing demand, migration and impact of adopted policy: Does not take into account provision for unmet housing demand in neighbouring authorities. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	164/9505 164/9506 164/9507	Hogg Builders (York) Ltd
	In view of disparity between level of provision that is indicated as being necessary by 2008-based household projections and by SHMA, housing requirement proposed is likely to prove inadequate and would fail to address needs of City and its people. (Grounds Not Justified)	165/8913	Home Builders Federation
	Approach underestimates number of dwellings likely to be required in plan period Reliance on degree of windfalls is significant and contrary to guidance in PPS3 and draft NPPF. There are significant risks to delivery of housing trajectory and inadequate flexibility in Strategy to bring forward alternative sites to meet housing needs. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	196/9694 196/9695 196/9696	York & North Yorkshire Chamber of Commerce

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
<p>Policy CS6 Continued</p>	<p>Approach to determining requirements for development during plan period does not accord with PPS3 for following reasons: - Not in accordance with RSS, which requires a provision of 850 dwellings a year for plan period and would result in 17,000 dwellings if extended to 2031. Not in accordance with emerging Localism Bill and draft NPPF as it does not take into account: - most recent household projections which would suggest a requirement of 1,277 dwellings a year, migration, findings of SHMA which suggest an annual requirement of 982 dwellings per year, most recent evidence on future housing demand, migration and impact of adopted policy and make provision for unmet demand in neighbouring authorities. Proposed level of future allocations is too low and an allowance has been made for windfall, which is contrary to PPS3. Approach contrary to existing legislation and guidance in that: - It has failed to consider all reasonable alternatives in respect of meeting higher housing requirement; Proposes that housing requirements, as calculated by RSS or by more recent evidence, should be met by other authorities and these authorities have not indicated their willingness to accommodate this additional level of development. Also contrary to draft NPPF as Council have failed to produce evidence that it has consulted neighbouring authorities to address cross boundary issues in particular shortfall of housing in terms of projected CLG requirement. Proposed dwelling provision not based upon credible evidence. Suggestion in Population Topic Paper that 2003 based projections should be relied upon due to 2008 projections being over inflated because of recent buoyancy in economy is without substance. Increasing level of dwelling provision to 1,380 a year will not only allow for a more sustainable pattern of development to be delivered which will reduce car journeys and encourage further development of public transport in City but will also address, in part high levels of planned under provision elsewhere in City region and wider region. Under provision of housing will stifle anticipated growth outlined in Topic Paper and approach is inconsistent in terms of employment and housing growth. Clear inadequacy of evidence base when considered against up-to-date data means that strategy selected cannot be regarded as reasonable and as such proposed level of housing provision also fails on this test of soundness. Incompatibility of evidence base for housing and employment render both elements of CS unsound, as they are contradictory.</p>	<p>316/8938 316/8939 316/8940 316/8937 2960/9431 2960/9432 2960/9433 2960/9434 2961/9444 2961/9445 2961/9446 2961/9447 2970/9601 2970/9602 2970/9603 2970/9604</p>	<p>Hallam Land Management Ltd Taylor Wimpey Redrow Homes Commercial Estates Group</p>

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS6 Continued	<p>There are areas that have not been identified in Figure 3.2 which therefore are not required to be kept permanently open (including area at Clifton Moor) which can and should be considered in terms of either meeting need for housing in plan period or safeguarded land outside of Green Belt to meet development needs of City beyond 2031 Suggested changes to Policy detailed in representation. (Hallam Land and Commercial Estates Group Only)</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)</p>	<p>316/8938 316/8939 316/8940 316/8937</p> <p>2960/9431 2960/9432 2960/9433 2960/9434</p> <p>2961/9444 2961/9445 2961/9446 2961/9447</p> <p>2970/9601 2970/9602 2970/9603 2970/9604</p>	<p>Hallam Land Management Ltd Continued</p> <p>Taylor Wimpey Continued</p> <p>Redrow Homes Continued</p> <p>Commercial Estates Group Continued</p>
	<p>Policy presumption in favour of brownfield sites ahead of greenfield sites is no longer consistent with national policy nor effective in terms of meeting housing demand in area. A sequential approach to housing development is no longer consistent with current PPS3 and is more akin to approach in previous PPG3. A restriction, or even phased approach, which limited greenfield sites to later periods of delivery, would result in a reduction in housing delivery. No evidence presented which outlines that assumptions made on housing delivery, and particularly brownfield housing delivery, are justified. Recommend that preference and priority to brownfield sites be removed from policy. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p> <p>Object to reduction in housing numbers over initial period of plan. ONS projections suggest that an additional 31,000 households will form in plan period whilst only a provision of 16,000 is provided within CS. (Grounds Not Justified)</p>	<p>331/8957 331/8958 331/8959</p> <p>331/8957</p>	<p>Taylor Wimpey (UK) Ltd</p>

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS6 Continued	<p>Approach as explained within Housing Paper accompanying CS suggests that use of earlier Household projections may be more appropriate given they do not include times of high economic activity. Do not accept this, as CS needs to plan for recovery.</p> <p>A level of growth of at least 850 new dwellings per annum would be an appropriate level of growth. See no justification for a lower level of growth in initial 5-year period, moreover greater levels of delivery should be encouraged and would be positive.</p> <p>Estimation of contribution from windfall of sites less than 0.2ha should be reduced. Given constraints to development within urban area of City unlikely that windfall will continue at past rates. Inappropriate to rely on such levels of windfall.</p> <p>Object to sequential approach prioritising Areas A1, A2 and B on Key Diagram.</p> <p>(Grounds Not Justified)</p>	546/9059	Miller Home Ltd
	<p>CS does not seek to meet York's housing needs but, rather, to set housing delivery at a level which contains quantum of greenfield land taken from "notional" Green Belt to a level which is politically acceptable at present time. Housing provision not supported by RSS, SHMA and most recent SHLAA is out of date. Most up to date (2008) ONS statistics indicate an annual average housing requirement for York to 2033 of 1250 additional units. This is significantly higher than CS. Housing provision also relies in part on delivery from windfall sites, contrary to national guidance. Early delivery of housing from York Northwest strategic site is unrealistic.</p> <p>Under-providing housing will exacerbate social divisions within City and run counter to one of key elements of LDF, which is to build confident, creative and inclusive communities.</p> <p>Quantum of housing development provided for is not supported by RSS; is not based on up to date data, including an up to date SHLAA, and relies, unrealistically, on delivery from York Northwest and, incorrectly, on delivery from windfall sites.</p> <p>If land to north of Northminster is developed for employment use it will generate additional traffic in same location as proposed access to York Central and could jeopardise successful development of York Central.</p> <p>(Grounds Not Justified; Not Consistent with National Policy)</p>	606/9558 606/9559	Jennifer Hubbard Planning Consultant

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS6 Continued	<p>Consultation results show that majority of residents believe that housing targets of 850 homes per year are too high, yet these remain in strategy. Results also show majority of residents opposed to identifying areas in draft Green Belt for development, yet strategy includes two such areas. Strategy must reflect views of the people who live in the City and must therefore be altered by reducing housing targets and retaining areas of search as Green Belt land. (Grounds Not Justified)</p>	1132/8396 1277/8460 2910/8382 2911/8385 2916/8407 2917/8410 2918/8413 2919/8416 2920/8419 2922/8430 2923/8433 2924/8436 2925/8439 2926/8442 2928/8445 2929/8448 2930/8451 2937/8463 2968/9593	Mrs B S Hilton Mrs A Stafford W & C B Pawelee Mrs M P Rowntree Mr & Mrs J&M Teasdale K Richardson J Almond B R Ellis Mr & Mrs WP&J Legg Mrs V B Swaby Mr S Briggs AW & CB Dodd B & S Osborne J Nicholson C Summers/C Kennedy J A Wood M S Wood Ms L Stafford P & A Suffield
	<p>Housing figures have been increased from those supported by previous public consultation and Council's Local Development Framework Working Group without public consultation. (Grounds Not Legally Compliant; Not Justified)</p>	2207/8397 2207/8398	Cllr J Watt
	<p>Strategy aims to build an average of 800 homes per year, despite majority of respondents feeling 850 was too high. Targets are not justified as based on growth predictions, which are unlikely to be met. Strategy unrealistic in assuming that brownfield land will deliver numbers of homes and jobs within earlier years of plan, given considerable constraints on Sites A and B. If assumptions are not reliable, developers could argue they need to bring forward areas of search A & B at a much earlier stage in the Plan. Allocation of search areas A and B is unnecessary and puts draft Green Belt land at risk of development. Policy should be revised to provide for a lower housing target in accordance with wishes of local residents, as expressed in Preferred Options Consultation. This would allow for areas of search A and B to be removed, making plan more effective at prompting use of Brownfield sites above Greenfield and responding to wishes of residents. (Grounds Not Justified; Not Effective)</p>	2459/8703 2459/8704	Cllr C Runciman

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS6 Continued	Object to land north of Area of Search A2 being identified as a Strategic Open Space. Site land off Avon Drive, Huntington has been promoted through SHLAA and LDF as a sustainable location for housing. At no stage has it been promoted to benefit green infrastructure of York and as site is in private ownership cannot be allocated as a site capable of providing a buffer to future urban extension.	2515/9576	Pilcher Properties Ltd
	Welcome increase in housing targets although these still fall short of RSS requirement. Housing numbers set out in RSS were adopted on basis that it would be subject to a selective Review to increase housing numbers between 18% and 35% (upper and lower limits). Whilst the RSS will be revoked in next few months evidence base which underpins housing figures (and need for immediate selective review) remain robust and is being used by Selby Council as part of its CS. Selby DC has recently deferred the Examination in Public under advice from Inspector to consider an increase in housing numbers of around 20-25%, based on an assessment of more recent population projections, housing demand and need. Therefore suggest that Council considers in detail whether it needs to increase housing numbers to be delivered. On the basis of Selby DC position this may need to consider and increase to around 21,000 units over CS period. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2537/9631 2537/9632 2537/9633	Lancaster & Burneston Family
	Proposed house building rate is unsound. Impossible to reconcile approach against that of most recent CLG and ONS (November 2010) Household projections, which shows a requirement for 1,240 dwellings p.a. Therefore fails to conform with RSS and PPS3. Policy fails to spatially distribute dwellings in accordance with a settlement hierarchy. Object to limited approach to housing provision in plan, Fails to plan positively to identify adequate land for housing over plan period by not allocating sufficient land in first instance. Reliance on windfall housing in first part of plan is not only contrary to policy but also prevents larger strategic sites that could help to deliver housing in short and medium term from being properly planned in terms of infrastructure delivery requirements. Delivery of an average of 635 dwellings per year between 2011/12 and 2015/16 has no regard to current market or affordable housing needs. Delivery of an average of 855 dwellings per year between 2016/17 and 2030/31 has no regard to household needs long term or any external housing need factors. Target should be a minimum of 1,000 dwellings per annum.	2689/9111 2689/9112 2689/9113 2689/9114	Monks Cross North Consortium

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS6 Continued	Identified Supply – No mechanisms in place to provide sufficient level of housing; no consideration of requirements of 'Planning for Growth' agenda, most recent ONS household projections, impact of in-migration or provisions of emerging NPPF. In light of significant housing shortfall, spatial strategy in particular SP1, 2 and 3 need to be amended to focus on actually providing required levels of housing, rather than adopting a sequential approach. Areas of Search should be identified as being deliverable in short term. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9111 2689/9112 2689/9113 2689/9114	Monks Cross North Consortium Continued
	Concerned that increased housing target will have environmental impacts on Green Belt and greenfield land which surrounds the City Centre. Two Areas of Search (A2 & B) would potentially include use of agricultural land. Appears that land in Huntington, Heworth Without and Osbaldwick has been set aside to meet housing targets. Feels this will encourage developers to submit further planning applications for Green Belt and greenfield land. CS should be amended to ensure that all existing Green Belt land is protected through the LDF. (Object No Grounds Stated) Concerned that previously agreed housing figure of between 500-600 new dwellings per year is now set at 800 new dwellings. Council's LDF Working Group also supported previous figure. Considers that housing strategy contained within CS is wholly ineffective and should be revised along same lines as original housing agreements. (Grounds Not Effective)	2726/8745 2726/8746	Mr J Sturdy MP
	Document was subject to major changes from that published in 2006, 2007 and 2009 without public consultation or debate at LDF working group. Disagrees entirely with inclusion of search area B as a site for housing development.	2881/8379	Cllr M Warters
	16000 new dwellings in next 20 years will swell York enormously and challenge infrastructure (hard and soft) of City to cope. Must not be just a debate about physical building of a certain number of dwellings and their location; it must be about how to accommodate this kind of growth within York's systems and what is needed to ensure have capacity to absorb, and cope well with additional load.	2898/9175	York Environment Forum
	Views of local people have been ignored in relation to housing figures being too high and loss of Green Belt to development. (Grounds Not Justified)	2915/8404	D Neal
	Policy as currently drafted does not accord with Government Guidance (inc PPS3, PPS12 and emerging NPPF). Fails to provide sufficient housing to meet projected needs of City and hinterland, allows for windfall against accepted practice, includes consented schemes and fails to identify sufficient developable sites. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2932/8756 2932/8757 2932/8758 2932/8759	Matbo Ltd

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS6 Continued	Strategy whose purpose is to set out a vision, strategic objectives targets and policies to guide where development goes in a way that will ensure the protection ... "does not seem to have particular vision, objectives, targets or policies e.g. housing quota, whose 800 figure is seen as more of an estimation than a min/max limit based on private development speculation; Castle Piccadilly site and others, which have been sought for development over many years but appear to be unfeasible without better development strategies; and the Heslington East swimming pool (which is touched on briefly and isn't part of a grand vision for York). (Grounds Not Justified)	2933/8780	Mr J Rose
	Land in objector's ownership is suitable, available, achievable and deliverable for future residential development during plan period. It is located immediately adjacent to built up area of Acomb. Site should be deleted from Green Belt as located in sustainable location in close proximity to range of local services and facilities. Council should reassess site and acknowledge its suitability for potential release from Green Belt to help accommodate any necessary development required during plan period.	2936/8794	York Diocesan Board of Finance
	Approach is flawed. Underestimates number of dwellings likely to be required in plan period. Housing provision places significant reliance on strategic brownfield sites in York North West Corridor, which have significant constraints. Reliance on windfalls is significant and contrary to guidance. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2940/8805 2940/8806 2940/8807	Shepherd Group Properties
	Will fail to deliver sufficient supply of land to meet City's housing needs and proposed new housing numbers over plan period is too low. Reliance on small windfall sites of less than 0.2ha and conversion of large properties coming throughout plan period is contrary to PPS3. Even if housing numbers are accepted, as well as all of identified areas of supply, including small windfall sites, this leaves a supply shortfall of 3,733 dwellings. Therefore Areas of Search for urban extensions will be a critically important element of land supply. Inappropriate, and again contrary to national guidance, to plan for this shortfall to be met through as yet unidentified sites in appropriate locations and it follows that broad Areas of Search should be extended to properly plan for City's future housing land requirements. Area of Search A1 should be extended both southwards and westwards to incorporate land at the junction of New Lane and Malton Road, Huntington. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2950/9191 2950/9192 2950/9193	Taylor Wimpey UK Ltd

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS6 Continued	<p>Reference to 16,000 dwellings is inadequate. Population Topic Paper, however it is noted that this figure is based on 2003-based household projections that have been superseded. York City-Wide Housing Needs Assessment provides justification that City of York should be planning for at least 25,000 dwellings and policy amended accordingly..</p> <p>Not appropriate to include a reduced allowance for windfalls to reflect historic rates of completions on very small windfall sites. Council should consider other sites that have been identified and begin work immediately to bring forward urban extensions and amend Green Belt boundary where appropriate. Council's approach does not demonstrate genuine local circumstances and therefore inclusion of windfalls should be discounted. Council's evidence base is not credible and inconsistent.</p> <p>Paragraph 8.2 states that 87% of growth will be focused towards main urban area of York. This should therefore be reflected in a revised policy, which sets out overall scale and distribution of housing growth for York. Areas of Search should be brought forward in immediate term to meet current housing needs. Council needs to be releasing more deliverable land to meet its current housing needs in short term. This includes land at A1, A2 and B, as well as other land including land at Moor Lane, Dringhouses (new area D). Policy should be amended. See representation for full text.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	2953/9282 2953/9283 2953/9284	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
	<p>Housing figures are not supported by a clear evidence base. Contrary to national policy to rely on windfalls within calculations of supply. Translation of housing targets into land requirements will not be sufficient to accommodate housing in form required i.e. 70% houses. An additional Area of Search to South of Moor Lane is proposed which would provide a range of choice for future housing development, the certainty of overall capacity and spread to deliver housing needed within plan period</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	2954/9328 2954/9329 2954/9330	Consortium of Landowners of Land South of Moor Lane
	<p>Evidence base is flawed, due to shortcomings of Arup Population Report and Housing Growth Supporting Paper. Housing target should be amended to reflect 2008 CLG household projections.</p> <p>Windfall Allowance is not in accordance with national planning policy. No special reason why York needs to allow for windfall sites. Reference to windfall allowance for small sites should be deleted.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)</p>	2959/9407 2959/9408 2959/9409 2959/9410	William Birch & Sons & Other Clients

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
<p>Policy CS6 Continued</p>	<p>Population and Household Projections – A combination of natural population growth, net in migration, together with a general trend towards reduced household sizes and therefore an increase in number of households suggests a significant level of growth needs to be planned for. Do not accept approach as explained within Housing Paper accompanying CS. CS needs to plan for recovery.</p> <p>Affordability – Affordable housing needs outstrip what could reasonably and viably be provided through S106 obligations and therefore is important that overall amount of new housing proposed is increased.</p> <p>Economic Needs and Growth – Delivery of housing supports a vibrant economy. City should be adopting a policy for growth and this suggests that level of housing growth should be higher.</p> <p>A level of growth of at least 850 new dwellings per annum would be appropriate. No justification for a lower level of growth in initial 5-year period, moreover greater levels of delivery should be encouraged and would be positive.</p> <p>Estimation of contribution from windfall of sites less than 0.2ha should be reduced. Given constraints to development within urban area of City unlikely that windfall will continue at past rates.</p> <p>Some additional flexibility should be allowed for in supply of sites in order to allow for unforeseen circumstances or delays in delivery from identified sites.</p> <p>The challenges to delivery associated with York Central and British Sugar should be reflected in plan and number of dwellings associated with these sites adjusted.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	<p>2963/9459 2963/9460 2963/9461</p>	<p>Mr TCottrell</p>
	<p>Recommends a substantially higher new housing target above 800 per annum to help address better affordable housing difficulties in City. An increased target of 1,200 new dwellings per annum would be a more reasonable compromise between Council's position, national population projections and serious affordability problems in City. Would go some way toward addressing housing demand both from new job creation and from past and current pressures on housing demand such as population growth, household growth, and people living longer in their own homes.</p>	<p>2964/9466</p>	<p>City of York Labour Party</p>
	<p>Following a poll of residents in Osbaldwick 95% were against future housing development on search Area B. Section 8 as written should be deleted and replaced with Section 8 from April 2011 version.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	<p>2965/9479 2965/9480 2965/9481</p>	<p>Osbaldwick Parish Council & Meadlands Area Residents Association</p>

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS6 Continued	Increase in housing targets not justified. Would put Green Belt in danger of being developed. Character of York needs to be protected. Target should be reduced to previous figure of 14000. (Grounds Not Justified)	2966/9588	Mr K Nicholson
	Vital to protect Green Belt, which will be put in danger of development if housing targets over next 25 years are increased from 14000 to 19500. (Grounds Not Justified)	2967/9590	Mrs M H Nicholson
Policy CS6 – 1 Identified Supply	Methodology raises a number of concerns. Identifies 3,967 dwellings with planning permission or part completed. Previously LPA accepted that drop out will occur and has discounted them by 10%. This approach should be continued to ensure CS plans for actual delivery of identified requirement. Identifies 2,460 dwellings to be delivered on two major strategic allocations. This constitutes a fifth of supply. Dwelling capacity on these sites has been over estimated. Unlikely they will deliver amount of dwellings envisaged at proposed densities. Council relying upon delivering a significant number of flats at sites, which will not be deliverable in current market conditions. Both sites are constrained by contamination issues and infrastructure and require significant investment in road infrastructure (and bridges). This is likely to prevent delivery of them within early years of plan: Identifies 3,108 dwellings on unidentified windfall sites, which comprises almost a quarter of supply. This is contrary to PPS3. Council have failed to demonstrate required exceptional circumstances to justify approach. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	164/9508 164/9509 164/9510	Hogg Builders (York) Ltd
	Unable to demonstrate a supply of specific developable sites for first ten years of plan. This is not in conformity with PPS3 and draft NPPF. The 10-year housing land supply includes a windfall allowance of 3,108 homes. This is too great and constitutes 19.5% of overall land supply. The 10-year land supply will also need to have regard to requirement of draft NPPF to allocate an additional 20% of sites against five-year land supply to provide for choice and competition in land market. Under these circumstances importance of beginning work on identifying and allocating urban extensions, and Council signalling its intention to do so through CS, assumes greater importance. (Grounds Not Effective)	165/8917	Home Builders Federation
	Given need for flexibility and that CS is largely non-site specific suggest that figures should not be so prescriptive. E.g. numbers should be rounded off and identified as targets rather than absolute numbers. (Comment)	2537/9634	Lancaster & Burneston Family
	Calculating windfall sites over 20-year plan period is not compliant with PPS3. No compelling evidence that prevents specific sites being identified and reliance on windfall sites to address shortage is inadequate. (Grounds Not Consistent with National Policy)	2699/9586	Messrs A & A Atkinson & Sykes

Section 8: Housing Growth and Distribution Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS6 – 2 Future Areas of Search for Urban Extensions	Suggested need for 'Future Areas of Search for Urban Extensions' arises from an increase in forecast of level of housing need identified over and above that identified in Draft Local Plan (incorporating 4th set of changes). This increase is unnecessary and excessive and 'Greenbelt' proposals should remain as outlined in Draft Local Plan (incorporating 4 th set of changes). (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	83/8356 83/8357 83/8358	Skelton Parish Council
	Request that area of search (A1) is extended to include land at New Lane South for housing development. Would maximise opportunity to deliver most sustainable Green Belt release as identified by Council and will avoid need for less sustainable release elsewhere. (Comment)	164/9511	Hogg Builders (York) Ltd
	Broad locations for these are identified in Key Diagram, which is helpful, but to ensure that these areas are deliverable and can be developed because necessary supporting infrastructure is in place, then work to plan for these areas must commence now. A programme and timetable setting out what needs to be done to ensure that these sites are ready for development from 2021 onwards, needs to be set out in CS. Policy should articulate a clearer commitment to undertake this planning work to ensure that it has an adequate housing land supply to underpin the plan. (Grounds Not Effective)	165/8918	Home Builders Federation
	Suggest that this includes land at Northfield, Knapton, with an appropriate designation on Key Diagram to make this element of CS sound. (Comment)	2537/9635	Lancaster & Burneston Family
Explanation			
General	Important to clarify that housing and employment growth in city are balanced and seek to reduce (or at least not exacerbate) level of commuting from neighbouring authorities.	17/8454	East Riding of Yorkshire Council
Para 8.02	Land adjacent to Designer Outlet not identified as a Green Belt character area although shown as an extension to a green wedge in Figure 3.2 (Grounds Not Justified; Not Effective)	70/8539 70/8540	Fulford Parish Council

Chapter 9 Aiding Choice in the Housing Market

Paragraph etc	Supporting Comments	Ref.	Name
Strategic Objective(s)	Support.	2953/9288	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Targets	Support Bullet Point 1.	2537/9636	D; L Lancaster; Philiskirk & Sons Ltd; Burneston Family
Policy CS9	Support inclusion of wording “minimum” net housing densities.	525/9041	Associated British Foods plc

Section 9: Aiding Choice in the Housing Market

Paragraph etc	Comments and Objections	Ref.	Name
General	Presumptions of housing density based on permissions from recent, pre-credit crunch housing markets are flawed given that market has altered significantly in this period, and is not expected to recover to 2007 levels for a number of years.	331/8966	Taylor Wimpey (UK) Ltd
	Providing 30% of housing requirement in form of flatted accommodation is unrealistic. Doubt whether market will deliver even this reduced contribution of flatted accommodation in future. Given credit crunch consider densities of 75dph in City Centre location is high (particularly in short term) when considering drop in demand for flatted accommodation. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2942/8829 2942/8830 2942/8831 2942/8832	DPP
Policy CS7	Point (v) is unrealistic in light of present market conditions. Policy not based on an up to date or credible evidence base. Also fails to reflect current economic viability and market tests. To require 30% of all new dwellings to be flats risks delivery of family-housing led schemes in sustainable suburban locations, stagnating local housing market/economy and preventing delivery of type of houses envisaged/required by SHMA. Figures should be revisited on basis of an updated SHMA once available and once it has been tested. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	164/9516 164/9517 164/9518	Hogg Builders (York) Ltd
	(iv) Requiring construction of homes in City Centre to be allocated for those aged 18-25 years is untenable, as Council has no means of controlling who will ultimately purchase or rent these homes. The policy requirement is ineffective and should be deleted. (Grounds Not Effective)	165/8920	Home Builders Federation
	Requirement that 70% of new dwellings should be houses is inconsistent with approach, which presumes that such high-density development will take place within City Centre (75dph) and even in some locations on edge of main urban area, which may need to incorporate apartments if they are to achieve densities set out. Part (iv), which requires construction of homes in City Centre to be allocated for those aged 18-25 years is not implementable since no means of controlling who will occupy these homes. A requirement for all homes to be built to Lifetime Homes standard is also unjustified, as it is not based on national policy requirement. In addition it is not consistent with Code Requirements or responsive to fact that many homes of a smaller scale cannot achieve lifetime homes standards though are still necessary in terms of housing requirements for district. Should be deleted from policy. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	331/8968 331/8969 331/8970	Taylor Wimpey (UK) Ltd
	Requirement for 100% provision to the standard is inappropriate in principle as this is a matter, which is the subject of Building Regulation Controls. There is no role for planning policies to duplicate or overlap with non-planning standards of construction.	525/9039	Associated British Foods plc

Section 9: Aiding Choice in the Housing Market Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS7 Continued	Balance of housing type – can't respond to "preferences" by building more houses rather than flats when need higher densities. Need to look at developing more acceptable models for flats. Key is asking people what they want to do, not what they want, and then developing housing/ neighbourhood models, which allow residents to live the lives they want.	551/8372	Constructive Individuals
	Council's desired housing mix within the draft policy is based on unsound information, as the SHMA was written prior to the recession and increasing evidence of the oversupply and lack of demand for flats. Therefore, Council should await the publication of the new SHMA, which would give a more realistic picture of the needed housing mix across the District at this time.	568/8673	The Land and Development Practice
	Not effective because "delivery partners" the local building industry has never supported the high affordable housing target and mix percentages for new developments. (Grounds Not Legally Compliant; Not Effective)	2207/8399 2207/8400	Cllr J Watt
	Target to provide as much as 30% of housing supply through the construction of apartments unrealistic. Doubtful as to whether market will deliver even this amount of such accommodation. Target not deliverable and CS is therefore not sound. (Grounds Not Effective)	2519/8719	Mr G W Procter
	Policy is not consistent with Government advice and guidance, in that SHMA documents should identify housing demand, not just need. Policy (1 st sentence) should be amended accordingly. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2537/9637 2537/9638 2537/9639	Lancaster & Burneston Family
	Requires 70% of all new dwellings to be houses but fails to inform where such dwellings are likely to be. With Council's focused identified supply being City Centre, there is no direction in Policy as to how this can be achieved. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9115 2689/9116 2689/9117 2689/9118	Monks Cross North Consortium
	Given large student population and pressures on existing housing stock, consideration should be given to allocation of suitable sites for purpose built student accommodation.	2914/8389	Blacklion Ltd
	Amend criterion iv to read: - "higher density in accessible locations, where appropriate and viable". Object to requirement that all new housing is built to Lifetime Homes standards. This is not appropriate in every case nor does It help viability and deliverability.	2932/8760	Matbo Limited
	Providing 30% of housing requirement in form of flatted accommodation is unrealistic. Doubt whether market will deliver even this reduced contribution of flatted accommodation in future. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2942/8833 2942/8834 2942/8835 2942/8836	DPP

Section 9: Aiding Choice in the Housing Market Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS7 Continued	Point v) is unrealistic in light of prevailing market conditions. Not based on up to date or credible evidence base. Fails to reflect current economic viability and market tests. To require 30% of all new dwellings to be flats risks delivery of family-housing led schemes in sustainable suburban locations, stagnating local housing market/economy and preventing delivery of type of houses envisaged/required by SHMA. (Grounds Not Justified)	2950/9194	Taylor Wimpey UK Ltd
	iii) Provision of specialist schemes should be considered on a site-by-site basis and focused towards those locations where there may be a specific local need. iv) Replicates Policy CS9 and is not necessary. vi) Requirement for Lifetime Home standards is in advance of national timescale established in national guidance document “Lifetime Homes: Lifetime Neighbourhoods” which does not require such standards until 2013 at the earliest. Inconsistent with national planning policy. Parts iii, iv and vi should be deleted. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9289 2953/9290 2953/9291	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
	Although Council is currently developing policies to ameliorate impact of high concentrations of HMOs in certain parts of City, LDF should acknowledge role HMO conversions play in reducing supply of family and starter housing and in contributing to rising house prices and rents in main urban area. Suggest policy approach of capping of off-campus student HMOs, and supporting additional on campus accommodation for students similar to that in Oxford City Council. (See representation for details). (Comment)	2964/9463	City of York Labour Party
Policy CS8	Unbalanced as is concerned almost entirely with interests of travelling population and not the wider community. Policy should be redrafted as follows:- The Council will work with its partners and local communities to ensure that appropriate provision is made for Gypsies, Travellers and Travelling Showpeople's accommodation needs. In allocating sites and for the purposes of considering planning applications, the following criteria will need to be satisfied: - i-vi) as drafted and add vii) Not be unacceptably detrimental to the amenity or character of the surrounding area; viii) Not harm the purposes of the Green Belt or be located in areas designated for their environmental value; ix) Not affect areas of importance to the historic character of the City; ix) With particular regard to sites for Travelling Showpeople, include appropriate provision for the storage, maintenance and testing of equipment, where required, without creating unacceptable nuisance, or present a risk to the health and safety of those living on or near the site. (Grounds Not Justified; Not Effective)	70/8541 70/8542	Fulford Parish Council

Section 9: Aiding Choice in the Housing Market Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS8 Continued	<p>Targets should be based on a secure evidence base and the stated figures significantly understate the level of provision required. An overview of Gypsy and Traveller Assessments was prepared for the YHRA in 2009 and represents the only form of benchmarking existing but does not seem to have been taken into account. Pitch figures should be amended to reflect the evidence base, with 102 pitches by 2015, and the figures to 2031 amended accordingly. Criteria iii and vi are unnecessarily restrictive. Criterion iii should be deleted as highways issues are covered in i. Criterion vi needs clarification – does this refer to transit provision, space for visitors or other use? Temporary provision will not always be acceptable on permanent sites, e.g. on a private family site. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)</p> <p>The pitch figures stated in the policy dramatically understate the level of provision required in the timescale set out. The pitch figures should be amended to reflect the evidence base in line with the Overview of Gypsy and Traveller Accommodation Assessments for the region, with 102 pitches required for the period 2007-2015 and a 3% compound growth rate added to extend to the time frame to 2031. The policy criteria are unnecessarily restrictive, in particular iii, and vi and should be amended as follows: - iii. Have safe and convenient highway access vi. This needs clarification - does this refer to transit provision, space for visitors or other use? Without clarification it is difficult to comment but temporary provision will not always be acceptable on permanent sites, e.g. on a private family site. Criteria viii and ix should be with the agreement of Travelling Showpeople in order that their particular needs are met. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)</p>	<p>396/8668 396/8669 396/8670 396/8671</p> <p>2887/8749 2887/8750 2887/8751 2887/8752</p>	<p>Friends Families & Travellers</p> <p>The National Federation of Gypsy Liaison Groups</p>
Policy CS9	<p>Challenge target of 70% houses rather than flats. Forecast decrease in household size with a 47% increase in single person households suggests balance should be in favour of flats. (Grounds Not Justified)</p>	55/8467	CPRE (York and Selby District)

Section 9: Aiding Choice in the Housing Market Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS9 Continued	<p>Policy fails to reflect both national and local market conditions. Levels proposed are not in accordance with market reality. A proposed density of 40 dwellings per hectare in defined suburban area is unrealistically high and not based upon current market factors. A figure of 30 dwellings per hectare is more realistic, based on a dwelling mix focused primarily on a mixture of 2, 3 and 4 bedroom properties, in accordance with demand identified in SHMA. To achieve such a density level, will require an element of apartments within dwelling mix, for which there is no market demand in such locations and no indication that there will be such a demand in the coming years. Therefore question how effectively assumed split between houses and apartments will rectify current imbalance in city's overall housing market caused as a result of number of high density apartment led schemes delivered over last decade.</p> <p>A figure of 30 dwellings per hectare should be adopted. When calculating proposed housing capacity of a site Council should refer to principles of PPS3, which refers to other attributes including characteristics of area and current and proposed mix of uses.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	164/9519 164/9520 164/9521	Hogg Builders (York) Ltd
	<p>Because majority of anticipated land supply will be in York City Centre, cannot see how requirement is achievable as cannot build houses at 75dph. To find a market, developments at lower densities than this will have to be considered by City and Urban centres.</p> <p>(Grounds Not Justified; Not Effective)</p>	165/8921 165/8922	Home Builders Federation
	<p>Densities in policy are too high and will result in a scale and form of development that is unlikely to be attractive to market.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	196/9697 196/9698 196/9699	York & North Yorkshire Chamber of Commerce
	<p>In view of the statement in Paragraph 9.12, there should be a corresponding section in the Policy acknowledging that there may be circumstances where the densities set out may not be either achievable or desirable. Add an additional sentence to Policy along the following lines: - "Lower densities may be permitted where this is necessary to safeguard an element which contributes to the distinctive character of the City".</p>	242/8657	English Heritage Yorkshire and the Humber Region
	<p>Presumptions of housing density based on permissions from recent, pre-credit crunch housing markets are flawed given that market has altered significantly in this period, and is not expected to recover to 2007 levels for a number of years.</p>	331/8967	Taylor Wimpey (UK) Ltd
	<p>Prescriptive, relatively high densities of development are contrary to PPS3, inflexible and could detrimentally affect delivery of development. Policy on development density should be deleted from Plan. Overall delivery of development should be amended to reflect more realistic levels of development density, which in line with market are likely to be significantly lower than stated.</p> <p>(Grounds Not Justified; Not Consistent with National Policy)</p>	546/9060 546/9061	Miller Homes Ltd

Section 9: Aiding Choice in the Housing Market Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS9 Continued	Target for new housing to be built at a minimum net density of 75 dwellings per hectare in city centre locations felt to be high in current economic conditions particularly in short term. Target not deliverable and CS is therefore not sound. (Grounds Not Effective)	2519/8720	Mr G W Procter
	Guidance in PPS3 has removed need for minimum densities; consequently question need for this policy and suggest that it is removed. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2537/9640 2537/9641 2537/9642	Lancaster & Burneston Family
	Housing densities should not be set as a minimum, which is rigid in approach and does not sit well with PPS3. A flexible approach needs to be adopted when considering housing densities to ensure that future delivery of housing is responsive to current market conditions and general characteristics of area. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9119 2689/9120 2689/9121 2689/9122	Monks Cross North Consortium
	Application of minimum densities is inappropriate and inconsistent with existing and emerging Government Guidance in PPS3 and NPPF. Imposition of a density of 75 dwellings per hectare for City Centre effectively means only flatted schemes could progress and even townhouses would be precluded which runs contrary to findings of SHMA. Remove reference to minimum densities and in particular the City Centre figure of 75 dph. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2932/8761 2932/8762 2932/8763 2932/8764	Matbo Ltd
	Given credit crunch consider densities of 75dph in City Centre location is high (particularly in short term) when considering drop in demand for flatted accommodation. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2942/8837 2942/8838 2942/8839 2942/8840	DPP
	Levels proposed are not in accordance with market reality. In particular a proposed density of 40 dwellings per hectare for housing development in defined suburban area is unrealistically high and is not based upon current market factors. Figure of 30 dwellings per hectare is more realistic, based on a dwelling mix focused primarily on a mixture of 2, 3 and 4 bedroom properties, in line with demand identified in SHMA and should be adopted as a starting point for discussions in defined sub-urban area of York. (Grounds Not Justified)	2950/9197	Taylor Wimpey UK Ltd
	Greater level of flexibility needs to be considered in regard to densities applied in city centre, urban, suburban and rural sub-markets. Density as set out in Policy should be more flexibly applied, with indicative ranges, rather than what appears to be minimum requirements for each sub market. Should be amended as follows: - City Centre 40 to 70 Dwelling per hectare; Urban 30 to 50 Dwelling per hectare; Suburban 30 to 40 Dwelling per hectare; Rural 20 to 40 Dwelling per hectare. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9292 2953/9293 2953/9294	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)

Section 9: Aiding Choice in the Housing Market Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS9 Continued	Densities assumed, particularly for suburban housing, but also for urban areas, are too high given greater need for houses than for flats and more land will be needed in practice even to accommodate numbers identified. A more realistic assessment is needed of densities appropriate for types of housing required. Additional area(s) of search should then be included for consideration through Allocations DPD. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2954/9672 2954/9673 2954/9674	Consortium of Landowners of Land South of Moor Lane
Explanation			
Para 9.02	Council's desired housing mix within the draft policy is based on unsound information, as the SHMA was written prior to the recession and increasing evidence of the oversupply and lack of demand for flats. Therefore, Council should await the publication of the new SHMA, which would give a more realistic picture of the needed housing mix across the District at this time.	568/8674	The Land and Development Practice
Para 9.05	Understates costs associated with provision of Lifetime Homes Standards, and impact this can have on overall viability of housing developments.	525/9040	Associated British Foods plc
Para 9.10	Given large student population and pressures on existing housing stock, consideration should be given to allocation of suitable sites for purpose built student accommodation.	2914/8390	Blacklion Ltd

Chapter 10 Affordable Housing

Paragraph etc	Supporting Comments	Ref.	Name
Policy CS10	Support flexibility inherent in annual reviews. Support recognition that reduction in overall amount of affordable housing sought may be appropriate where high level of provision would render development unviable.	525/9042	Associated British Foods plc
	Broadly supported in principle.	2537/9643	D; L Lancaster; Philiskirk & Sons Ltd; Burneston Family

Section 10: Affordable Housing

Paragraph etc	Comments and Objections	Ref.	Name
General	<p>Policy does not accept findings of its own viability study in terms of significant implications of additional enhanced Code for Sustainable Homes requirements which will be brought forward through Building Regulations in coming years. This will consequently affect housing delivery and be contrary to overall aims of plan. (Grounds Not Effective)</p> <p>A situation where each development had to prove viability reasons why a policy requirement should be relaxed would be inconsistent with national policy and emerging Planning for Growth Agenda from Government. PPS3, indicates that planning policy in relation to affordable housing must take into account issues of viability (and hence deliverability) in formulating affordable housing thresholds and targets, and that such considerations should not be limited to site specific negotiations. (Grounds Not Consistent with National Policy)</p> <p>Object to overall targets within plan being confined only to a subsequent SPD, with no clear indication at this stage as to how this policy will be applied. (Object No Grounds Stated)</p>	331/8971 331/8972 331/8973	Taylor Wimpey (UK) Ltd
	Given likely changes to national planning framework, Council will need to have very specific, evidence-based requirements to ensure developers include good affordable housing. City needs a wide social/economic mix and, given the push towards sustainability, can't become a city of wealthy occupants, which busses in low-earners when required. (Comment)	551/8373	Constructive Individuals
	Disagrees with statement that "there is technical justification for 100% affordable housing, although this is clearly not an economically viable option". Economically, the viability of 100% affordable housing is quite high as Council owned housing can easily be dominated by affordable housing. There doesn't appear to be an actual justification for affordable housing. With the current Hungate expansion and average house/rent prices in York, much easier to justify very high levels of affordable housing than the opposite, as expensive housing is more available than cheaper housing. Completely opposes 25% affordable housing, given current availability and trends in York, it should be close to 50%. Cheap and Energy Efficient housing is what is most needed, and this plan does not allow these. (Grounds Not Justified)	2933/8781	Mr J Rose
	Level of affordable housing needed in City is much higher than actual total annual house completion rate. Annual target level for new dwellings, to ensure a more credible level of affordable housing is delivered and to account for flexibility on certain developments when it comes to levels of affordable housing, must be higher than simply enough to meet number required for predicted jobs growth. (Comment)	2964/9464	City of York Labour Party

Section 10: Affordable Housing Continued

Paragraph etc	Comments and Objections	Ref.	Name
Strategic Objectives	Reference to 2007 SHMA should be deleted and replaced with reference to “an up to date” SHMA. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9295 2953/9296 2953/9297	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Policy CS10	The Affordable Housing Viability Study does not adequately support the 20% level of affordable housing on sites for 5-10 dwellings. Insufficient evidence to justify that level of affordable housing is viable on smaller sites. Concerned with land value assumptions made in Viability Study. Approach used is flawed as ignores how land market operates. Further evidence base should be provided to justify values used. LPA should undertake an update to their current SHMA, which was commissioned in October 2006. Introduction of an affordable housing SPD will unnecessarily repeat Core Strategy policy. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	164/9522 164/9523 164/9524	Hogg Builders (York) Ltd
	Council’s viability study and resulting policy has not taken into account requirement of PPS3, to consider impact of affordable housing requirements on ability to deliver low cost market housing. Affordable housing targets proposed depend for viability upon keeping market housing as expensive as possible. This excludes possibility of developers providing low cost market housing in district for those who need it. (Object No Grounds Stated) Proposal to defer more detailed matters relating to provision of affordable housing to an SPD is contrary to PPS12 and draft NPPF. Many of the matters listed will have a direct bearing on viability of housing provision and consequently delivery of plan. These must be addressed in CS and discussed at examination. (Grounds Not Consistent with National Policy)	165/8925 165/8926	Home Builders Federation
	Concerned that policy, and in particular approach to viability set out in AHVS will have adverse impacts on residential development in city. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	196/9700 196/9701 196/9702	York & North Yorkshire Chamber of Commerce
	Object to imposition of current interim policy position and would in principle support adoption of a sliding scale approach, however levels at which affordable housing would be required, and at what thresholds, cannot yet be suitably assessed. Would support imposition of maximum targets, which again would allow for the consideration of site-specific matters and abnormal costs.	331/8974	Taylor Wimpey (UK) Ltd

Section 10: Affordable Housing Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS10 Continued	Serious concerns regarding workability of Dynamic Model, and consider that as currently drafted in CS model is unworkable. CS should clearly state position in relation to 2007 SHMA, indicating that targets will be subject to change during plan's lifetime. The 25% target does not reflect stakeholder concerns and additional research. Until these matters are resolved, and until AHVS is concluded to be a robust evidence base, following independent examination of CS, this should be stated and a tentative target included. Suggest that explanatory wording should be included to emphasise this is the position. Under iv), no justification for assuming a relationship between market-demand and affordable housing needs, nor specifically for assumption that affordable housing should be provided in same size mix as market housing. Draft pro rata approach could jeopardise delivery of residential developments within City and/or result in a mismatch between needs and provision, with serious potential issues of under occupation. In respect of former British Sugar site, proposed mix of private housing should respond to demands of market, whilst provision of affordable housing should rightly respond to needs as assessed in Council's evidence base. Policy as currently drafted could be interpreted in such a way as to make this approach incompatible with national guidance. (Grounds Not Consistent with National Policy)	525/9043	Associated British Foods plc
	Not effective because "delivery partners" the local building industry has never supported the high affordable housing target and mix percentages for new developments. (Grounds Not Legally Compliant; Not Effective)	2207/8401 2207/8402	Cllr J Watt
	Introduction of dynamic targets introduces an element of uncertainty, which makes it difficult for developers to assess viability of schemes going forward. So as not to stifle development opportunities in short term a target of 35% should be introduced in CS. Within text, provisions should also be made for policy to be reviewed periodically (possibly every 5 years). (Grounds Not Justified; Not Effective; Not Legally Compliant)	2689/9123 2689/9124 2689/9125	Monks Cross North Consortium
	Affordable Housing Viability Study fundamentally flawed. Fails to take account of realistic site values or build costs. Also no studies were done on sites of less than 10 dwellings. Should be zero provision on all sites of less than 10 dwellings. Above 10 dwellings a flat rate target of maximum 15% should be sought. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2701/8739 2701/8740 2701/8741 2701/8742	Laverack Associates Architects
	Object to the imposition of 'dynamic' affordable housing targets in line with the referenced study particularly in respect of smaller schemes. Table 10.1 indicates that 20% will be sought for schemes of 5 -10 units and 25% for schemes of 11-14 dwellings. This is unreasonable, inappropriate and shows a disregard for the cost of brownfield regeneration and the prevailing market conditions. Remove reference to targets for schemes of less than 15 units. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2932/8765 2932/8766 2932/8767 2932/8768	Matbo Ltd

Section 10: Affordable Housing Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS10 Continued	<p>Affordable Housing Viability Study fundamentally flawed. Land values used for viability threshold not evidence based. Targets for affordable housing in policy not justified. Policy and supporting text should be deleted and Council should commission a further viability study and set realistic evidence based targets. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)</p>	<p>2945/8850 2945/8851 2945/8852 2945/8853</p>	<p>Claxton Construction Ltd</p>
	<p>Policy should refer to an up-to date AHVS, given that life span of CS is 15 years and needs to be flexible to take in to account changing circumstances. Parts iii and iv should refer to “an up-to-date SHMA” to ensure that when planning applications are being considered by Council, the affordable housing requirements reflect current housing market. Policy does not provide a firm, clear and certain basis for securing the maximum number of affordable homes and flexibility to allow for exceptions where justified. It does not offer a good starting point for negotiations and does not accord with PPS3. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	<p>2953/9298 2953/9299 2953/9300</p>	<p>Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)</p>
	<p>AHVS ignores evidence based land transaction data. In addition participation and research that inform AHVS were not extensively undertaken Incorrect assumptions fed into the Dynamic Viability produce an incorrect Policy. Assumption regarding land value and build costs are flawed; Proposes to deal with matters in an SPD that should be rightly be included within Policy. (See representation for full detailed comments) (Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	<p>2969/9594 2969/9595 2969/9596</p>	<p>Barratt Homes, Persimmon Homes, Miller Homes, Shepherd Homes, Taylor Wimpey & Helmsley Group</p>
Policy CS10 – Exception Sites	<p>Emerging Government policy advises against use of such “initiatives” and advocates that sites should ensure a mix of market and “affordable” housing to ensure sustainable and mixed communities. This element of policy should be removed and replaced with a phrasing, which identifies that sites will be identified within rural areas, which will bring forward a mix of market and affordable housing. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	<p>2537/9644 2537/9645 2537/9646</p>	<p>Lancaster & Burneston Family</p>
Explanation			
Dynamic Targets Table 10.1	<p>The Affordable Housing Viability Study does not factor in cost of building to Code for Sustainable Homes 4 and 6 in its modelling even though this is a CS policy requirement. Report acknowledges that building to Code 4 will have an impact on affordable housing delivery. Council has not assessed impact this policy requirement might have on delivery of plan, in conjunction with its affordable housing requirements. (Grounds Not Justified)</p>	<p>165/8923</p>	<p>Home Builders Federation</p>

Section 10: Affordable Housing Continued

Paragraph etc	Comments and Objections	Ref.	Name
Explanation Continued			
<p>Dynamic Targets Table 10.1 Continued</p>	<p>Object to the imposition of 'dynamic' affordable housing targets in line with the referenced study particularly in respect of smaller schemes. Table 10.1 indicates that 20% will be sought for schemes of 5 -10 units and 25% for schemes of 11-14 dwellings. This is unreasonable, inappropriate and shows a disregard for the cost of brownfield regeneration and the prevailing market conditions. Remove reference to targets for schemes of less than 15 units. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)</p>	<p>2932/8769 2932/8770 2932/8771 2932/8772</p>	<p>Matbo Ltd</p>
<p>Affordable Housing Supplementary Planning Document Para 10.16</p>	<p>Proposal to defer more detailed matters relating to provision of affordable housing to an SPD is contrary to PPS12 and draft NPPF. Many of the matters listed will have a direct bearing on viability of housing provision and consequently delivery of plan. These must be addressed in CS and discussed at examination. (Grounds Not Consistent with National Policy)</p>	<p>165/8927</p>	<p>Home Builders Federation</p>

Chapter 11 Community Facilities

Paragraph etc	Supporting Comments	Ref.	Name
Policy CS11	Supports iv.	398/8997	Sport England
	Strongly support.	458/9010	York Green Party (D Craghill)
Explanation Community Facilities Paragraph 11.02	Strongly support intent of paragraph.	458/9012	York Green Party (D Craghill)

Section 11: Community Facilities

Paragraph etc	Comments and Objections	Ref.	Name
Targets	Needs strengthening to meet strategic objective of low carbon neighbourhoods. Suggest following wording for Bullet Point 2: - “ All new community facilities to be in locations that are easily accessible by walking and cycling and a maximum of 5 mins or 300 metres pedestrian friendly walk away from a bus route offering a minimum 15 minute frequency during the day and early evening Mon – Sat and a minimum 30 mins service late evenings and Sundays. (Grounds Not Effective)	458/9009	York Green Party (D Craghill)
Policy CS11	<p>Policy not based on a sound Infrastructure Delivery Plan [IDP], which identifies deficiencies in existing community facilities. It should set out site size or dwelling thresholds for which contributions for off site infrastructure will be required.</p> <p>Suggest should include following additional policy: -</p> <p>“Planning obligations will be negotiated to ensure that adequate infrastructure, public transport, services and facilities are available, or the developer has arranged to provide or improve availability to a required standard. Contributions will be sought for necessary physical, social, economic and environmental infrastructure directly related in scale and kind to the proposed development, these being: -</p> <ul style="list-style-type: none"> i) Affordable housing ii) Transport infrastructure improvements iii) Education and skills training provision iv) Health care provision and social services v) Renewable energy and recycling vi) Public transport provision that will serve the development site vii) Community and leisure buildings and facilities viii) Waste and water management ix) Open space and biodiversity initiatives <p>With regard to residential developments, criteria iii to vii will only be applied to sites of 150 dwellings or more, or to smaller dwelling thresholds where it can be demonstrated that these contributions are required to mitigate the impact of the development (e.g. where the development will result in a shortfall in school places)”. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	164/9525 164/9526 164/9527	Hogg Builders (York) Ltd
	Propose inclusion of Skate Park to west of the City in the Acomb area/North West Corridor. Acomb is among only six wards identified as “areas where there are currently large accessibility deficiencies and therefore opportunities for new provision”.	2943/8842	Carr Junior School Safe Skate Committee
	Access to cycle routes and outdoor play spaces for children and young people should also be included. Important that there is good accessibility to built sport facilities by frequent public transport and cycle routes from different areas of the City.	2944/8847	York Youth Council

Section 11: Community Facilities Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS11 Continued	Not based on a sound Infrastructure Delivery Plan, which identifies deficiencies in existing community facilities. Circular 05/2005 requires that obligations must be fairly and reasonably related in scale and kind to proposed development and reasonable in all other respects. Policy does not satisfy this test or define site size or dwelling thresholds for which contributions for off site infrastructure will be required. Additional policy wording suggested. See Representation for details. (Grounds Not Justified; Not Effective)	2950/9199 2950/9200	Taylor Wimpey UK Ltd
	Should acknowledge that some provision will be met by way of access agreements with other providers but that these facilities remain outside 'community' ownership, e.g. use of University Sports Centre by Fulford School. (Comment)	2958/9339	University of York
Explanation			
Community Facilities Para 11.02	More emphasis needed on non-built community facilities i.e. outdoor facilities needed. Suggest additional wording to include outdoor facilities specifically. (Grounds Not Justified)	203/8614	Mrs J Hopton
	Should be strengthened by adding: - "There will be a presumption in favour of community facilities sited within walking distance of local neighbourhoods or where larger scale facilities, those with the best on-car access for the largest number of residents". Add to list of community facilities: - Public Houses, Community Cafes, Church Halls and Post Offices. (Grounds Not Effective)	458/9011	York Green Party (D Craghill)
Community Facilities Para 11.04 to 11.06	Community facilities are good but support is required for communities to make use of them. Council has reduced this support as part of cutbacks. Capital will be mis-spent unless there's ongoing funding to support community groups. (Comment)	551/8374	Constructive Individuals
Built Sports and Community Leisure Facilities Para 11.07	More emphasis needed on non-built community facilities i.e. outdoor facilities needed. Suggest additional wording to include outdoor facilities specifically. (Grounds Not Justified)	203/8615	Mrs J Hopton
	Will become unsound if proposal for community stadium and major retail development at Monks Cross is approved as not a sustainable location for stadium and retail development will undermine principles throughout LDF. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	458/9013 458/9014 458/9015	York Green Party (D Craghill)
Local Retail Provision Para 11.08	To support low carbon neighbourhoods, reduce need to travel and support local purchasing, definition of "day to day needs" should be expanded. Suggest: - "The LDF will support the development of small scale retail facilities in local centres and neighbourhood shopping parades where they would provide for local needs, including essential food and domestic requirements". (Grounds Not Effective)	458/9016	York Green Party (D Craghill)

Chapter 12 Education, Skills and Training

Paragraph etc	Supporting Comments	Ref.	Name
General	Welcome references to maximising opportunities for community sport on school sites.	398/9000	Sport England

Section 12: Education, Skills and Training

Paragraph etc	Comments and Objections	Ref.	Name
General	Better provision needs to be made in this section for promotion of the informal system and for the development of skills for personal development and fulfilment in life.	2946/8876	The Garden & Landscape Heritage Trust
Policy CS13	Policy unconstrained and too permissive. CS must recognise that unrestrained growth of these institutions will not be sustainable. (Grounds Not Justified; Not Effective)	70/8543 70/8544	Fulford Parish Council
	LDF should support in iv) the creation of sufficient jobs across the skill base to provide York's school leavers, college leavers and graduates with local employment.	88/8604	Wigginton Parish Council
	Exact and precise educational requirements and resulting land requirements should be established through a detailed assessment of educational resources and needs undertaken as part of masterplanning and planning application process for York Northwest Strategic Allocations and in particular former British Sugar/Manor School Site. (Comment)	525/9044	Associated British Foods plc
	Given large student population and pressures on existing housing stock, consideration should be given to allocation of suitable sites for purpose built student accommodation.	2914/8391	Blacklion Ltd
	iv: should include expansion of Heslington West campus in addition to Heslington East. v: providing that provision for new student housing is adequate to meet institution's expansion numbers, there should be no requirement for the provision to be on campus. (Comment)	2958/9340	University of York
Policy CS14	Requiring all major development proposals to provide training schemes through S106 does not comply with CIL Regulations. Council should prepare a CIL Charging Schedule that makes provision for training and employment initiatives. Policy should be deleted.	165/8929	Home Builders Federation
	Important that apprenticeship opportunities for young people are included in the targeted recruitment and training.	2944/8848	York Youth Council
	Education and training, beyond providing infrastructure, is not a matter for LDF or planning policy. Requirement to provide supporting information as part of a planning application and enter into S106 to provide training opportunities and local labour is not reasonable or justified in relation to Circular 05/05 Planning Obligations. Policy should be deleted. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2959/9411 2959/9412 2959/9413 2959/9414	William Birch & Sons & Other Clients
Explanation			
Education, Skills and Training Para 12.02	Sport England also has a range of tools to assist planning for sport on school sites. (Comment)	398/8998	Sport England
	Exact and precise educational requirements and resulting land requirements should be established through a detailed assessment of educational resources and needs undertaken as part of masterplanning and planning application process for York Northwest Strategic Allocations and in particular former British Sugar/Manor School Site. (Comment)	525/9045	Associated British Foods plc

Section 12: Education, Skills and Training Continued

Paragraph etc	Comments and Objections	Ref.	Name
Explanation			
Education, Skills and Training Para 12.02 Continued	Does not make it clear that additional school places must be found for York's growing school population. Either housing target ought to be revised downwards or else paragraph must be strengthened to include a definite commitment to building a new primary school to meet York's needs. (Grounds Not Effective)	2949/9182	York Green Party (O Clayton)
Education, Skills and Training Para 12.03 & 12.04	Dept of Education building bulletins are currently under review by Government. Some LEAs are no longer working to these requirements. Suggest this section is redrafted so as it is not overtaken by events. (Comment)	398/8999	Sport England
Education, Skills and Training Para 12.07	Given large student population and pressures on existing housing stock, consideration should be given to allocation of suitable sites for purpose built student accommodation.	2914/8392	Blacklion Ltd
Targeted Recruitment and Training Para 12.11	No mention of a framework for green infrastructure/ecosystem services training for the new skills required. Link new skills training using University, Colleges and Schools to learn about the countryside.	1656/8683	Mr B Otley

Chapter 13 Sustainable Economic Growth

Paragraph etc	Supporting Comments	Ref.	Name
General	Support conclusion that York can support a growth level of 960 jobs per year.	2964/9465	City of York Labour Party
Targets	Welcomes commitment to creation of 1000 jobs per year and to identification of land for employment development.	196/9355	York & North Yorkshire Chamber of Commerce
Policy CS16	Support Area of Search C.	532/9555	Northminster Ltd
Policy CS16 1 Provision of Employment Land Paragraph v	Area to east of Industrial Estate at Wheldrake could be used in future. Planning decisions should minimise any potential conflict between industrial and residential uses.	87/8597	Wheldrake Parish Council

Section 13: Sustainable Economic Growth

Paragraph etc	Comments and Objections	Ref.	Name
General	Council should encourage unemployed in York to try their hand at setting up a small enterprise.	2941/8811	Mr M Vassie
Targets	Employment targets do not take into consideration environmental capacity of York to safely absorb numbers proposed. (Grounds Not Justified; Not Effective)	70/8545 70/8546	Fulford Parish Council
	Target of 1000 new jobs is inadequate. York is already failing to provide/create enough jobs for people emerging from its education system. Should be a revised target of around 2000 or more new jobs across the skill range. (Grounds Not Effective)	88/8606	Wigginton Parish Council
	Target to create 1000 new jobs a year is unrealistic especially given current economic climate. (Grounds Not Justified)	2459/8705	Cllr C Runciman
	Not in accordance with thrust of national planning policy or target set out in RSS of 2130 jobs per annum. Also only reflects local job growth. Should be amended to include reference to wider role York has in region and actual job growth target should be increased to take account of job growth over and above that derived within district. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2959/9415 2959/9416 2959/9417 2959/9418	William Birch & Sons & Other Clients
Policy CS15	Support for educational establishments repeats Policy CS13(iv) and is unnecessary here. (Grounds Not Justified; Not Effective)	70/8547 70/8548	Fulford Parish Council
	Policy is too narrow. Should include support for existing and potential employment uses, employment in its widest sense, not just 'B' uses. Needs to support jobs in danger of being lost and potential jobs as well as existing jobs. Plan period is well out of reach of prediction of future nature of employment. A flexible supportive policy on job creation and job retention is needed, be they from rural diversification, urban regeneration or reuse of former employment buildings or sites to different or non- conventional employment activities.	171/8931	O'Neill Associates
	Clear incompatibility of evidence base for housing and employment render both elements of CS unsound, as they are clearly contradictory. (Grounds Not Sound no reason stated; Not Legally Compliant)	316/8945 316/8946 2960/9436 2960/9437 2961/9449 2961/9450 2970/9612 2970/9611	Hallam Land Management Ltd Taylor Wimpey Redrow Homes Commercial Estates Group

Section 13: Sustainable Economic Growth Continued

Paragraph etc	Comments and Objections	Ref.	Name
<p>Policy CS15 Continued</p>	<p>To be more flexible and to be more in line with National Planning Policy, Policy should provide more support to employment development in rural areas. Suggest additional bullet point is added after Point (iii): - “Increasing employment opportunities in rural areas and supporting the diversification of the rural economy.” (Grounds Not Consistent with National Policy)</p>	515/9540	Harworth Estates
	<p>Proposal to safeguard existing employment sites is longstanding and has been ineffective. In recent past existing employment sites have been sacrificed for residential development. A more honest and realistic drafting of this policy should be undertaken. This will increase amount of additional land required.</p> <p>Little evidence that importance of manufacturing and export sectors, have been understood or addressed or that additional land will be allocated. Absence of a clear strategy for growth of manufacturing, as a discrete employment sector, is a major failure.</p> <p>The qualitative dimension to employment land is not reflected in Employment Land Review Stage 2 (2009) or in CS.</p> <p>Employment Land Review does not address impact of either current minimal supply on historic demand levels or future need for a range of different sizes sites. Whilst CS purports to address total area required, does not consider how to ensure availability of a range of different sized sites.</p> <p>CS is flawed because there is focus on York Central to exclusion of wider issues. Science City is a credible strategy but not as sole strategy for employment growth. Needs of manufacturing and distribution must be given proper consideration.</p> <p>(Grounds Not Justified; Not Effective)</p>	606/9562 606/9563	Jennifer Hubbard Planning Consultant
	<p>ii: Section should include “and their facility to generate and/or attract related employment including Science City York type jobs”. (Comment)</p>	2958/9341	University of York
	<p>No reference to support for expansion of existing employment and commercial locations across district, particularly Airfield Business Park at Elvington.</p> <p>(Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)</p>	2959/9419 2959/9420 2959/9421 2959/9422	William Birch & Sons & Other Clients
<p>Policy CS16</p>	<p>Clear incompatibility of evidence base for housing and employment render both elements of CS unsound, as they are clearly contradictory.</p> <p>(Grounds Not Sound no reason stated; Not Legally Compliant)</p>	316/8947 316/8948 2960/9438 2960/9439 2961/9451 2961/9452 2970/9713 2970/9613	Hallam Land Management Ltd Taylor Wimpey Redrow Homes Commercial Estates Group

Section 13: Sustainable Economic Growth Continued

Paragraph etc	Comments and Objections	Ref.	Name
<p>Policy CS16 Continued</p>	<p>Supply of land for B1(c), B2 and B8 uses is currently inadequate and CS fails to address current deficiencies let alone make provision for future growth in these sectors. Need for a strategic site (or sites) for these uses to be identified for immediate release. Grimston Bar is sequentially most appropriate site for employment development, particularly for these purposes. Policies do not flow from evidence base and CS will fail to achieve 2 elements of Vision namely to build confident and inclusive communities and to ensure a prosperous and thriving economy. Targets are fairly general and no reference made to unskilled or manual employment or explicit mention of business, manufacturing or distribution. Needs of manufacturing and distribution must be given proper consideration. Little evidence that importance of manufacturing and export sectors, have been understood or addressed or that additional land will be allocated. Absence of a clear strategy for growth of manufacturing, as a discrete employment sector, is a major failure. Does not address need for sites of a particularly high quality. Adopts dictatorial tone to B1c, B2 and B8. Very little suitable land is available on these existing sites. This aspect of CS underscores a lack of comprehension about needs of business. Focus of employment generation, in CS is York Central and Science City York. York Central is aspirational and has still not been developed. Science City York may create high quality jobs, but is not type of employment, which would be suitable for 7% in City whose formal academic qualifications are minimal. A strategy, which draws highly qualified and highly paid professionals into area, will have effect of further increasing cost of housing. CS is flawed because there is focus on York Central to exclusion of wider issues. Science City is a credible strategy but not as sole strategy for employment growth. The qualitative dimension to employment land is not reflected in Employment Land Review Stage 2 (2009) or in CS. Employment Land Review does not address impact of either current minimal supply on historic demand levels or future need for a range of different sizes sites. Whilst CS purports to address total area required, does not consider how to ensure availability of a range of different sized sites. A land supply, which creates competition, is an essential element of an efficient market. CS should seek to address this by ensuring that supply of land is sufficient to create a competitive market. (Grounds Not Justified; Not Effective)</p>	<p>606/9560 606/9561</p>	<p>Jennifer Hubbard Planning Consultant</p>
	<p>Concerned that approach in seeking to reduce annual employment target is contrary to Government's approach. Suggest that employment/growth targets are increased. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	<p>2537/9648 2537/9649 2537/9650</p>	<p>Lancaster & Burneston Family</p>

Section 13: Sustainable Economic Growth Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS16 Continued	Provides no detailed guidance on where land will be required and in what quantities. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9126 2689/9127 2689/9128 2689/9129	Monks Cross North Consortium
	Criteria will not ensure there is a supply of appropriate sites to meet full range of market and employment demand during Plan period, and does not provide support for expansion of existing employment sites. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2959/9423 2959/9424 2959/9425 2959/9426	William Birch & Sons & Other Clients
Policy CS16 1 Provision of Employment Land	Strategy does not identify adequate land and some of land identified is soon to be developed out, e.g. York Business Park. Strategy does not make clear where or how 1000 jobs to be created each year will be accommodated. Needs to make provision for employment land that can be released in 'manageable' site sizes to the market. (Grounds Not Justified; Not Effective; Not Consistent With National Policy)	196/9356 196/9357 196/9358	York & North Yorkshire Chamber of Commerce
	Proposal to restrict land use of Northminster Business Park (or Grimston Bar if it was preferred) to B1(c), B2 & B8 only, does not accord with draft National Planning Policy Framework. At variance with direction of travel of recent government planning policy, which seeks to maximise contribution that employment development can make to sustainable economic growth. The tight use class restrictions proposed do not accord with this approach and would constrain growth if left unchanged. iv) Should be amended to support allocation of Grimston Bar as a suitable employment land location and reference to Northminster Business Park removed. Should be further amended to allow for early release of Grimston Bar so it can make a full and meaningful contribution to sustainable economic growth throughout plan period and offer choice to businesses. Also, potential uses appropriate at Grimston Bar should be amended to incorporate B1 office and hotel, together with complementary and supporting uses including, e.g. leisure/tourism facilities, restaurants, car showrooms and trade park uses. (Grounds Not Justified; Not Effective; Not Consistent With National Policy)	2687/8733 2687/8734 2687/8735	Tangent Properties
	Needs to be specific strategic roles defined for each site. Also, timescales are crucial and action needs to be specified to make sure they come forward now to meet needs. Major problems and questions need to be addressed regarding impact of allocations on northern section of Outer Ring Road, which is already congested and causes problems for residents in crossing or travelling along it.	2935/8790	Mr T Bennett

Section 13: Sustainable Economic Growth Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS16 1 Provision of Employment Land Para iv	Support identification of land within Area C as future employment allocation but suggest brought forward through Allocations DPD.	2537/9647	D; L Lancaster; Philiskirk & Sons Ltd; Burneston Family
Policy CS16 1 Provision of Employment Land Para v	Current wording of policy may be restrictive. Should be amended to provide flexibility for other employment uses, which may not be related to traditional rural activities, but which may not be appropriate within urban areas, including renewable/low carbon energy generation. Suggest: - "Facilitating the development of employment uses in rural areas appropriate in scale and nature to their rural location and supporting rural diversification schemes where appropriate in sustainable transport terms". (Grounds Not Effective)	515/9541	Harworth Estates
Policy CS16 2 Existing Employment Land	CS needs to assess whether it has a sufficiency of land to support its housing targets. Highly likely that some existing employment land will need to be granted planning permission for Council to meet targets set out in its housing trajectory. Requiring developers to justify release of such sites would introduce an additional element of uncertainty to planning process.	165/8930	Home Builders Federation
	Requirement to demonstrate that proposal would not have a detrimental effect on future supply of employment land in either quantitative or qualitative terms should be proportionate in that a small scheme/loss of floorspace should not be required to carry out a full such appraisal across a wide area.	2932/8773	Matbo Limited
Explanation			
General	Important to clarify that housing and employment growth in city are balanced and seek to reduce (or at least not exacerbate) level of commuting from neighbouring authorities.	17/8455	East Riding of Yorkshire Council
Future Growth Table 13.1	Provides no detailed guidance on where land will be required and in what quantities. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9130 2689/9131 2689/9132 2689/9133	Monks Cross North Consortium

Paragraph etc	Comments and Objections	Ref.	Name
Distribution Para 13.11	Support for City's further and higher education facilities repeats Policy CS13(iv) and is unnecessary here. (Grounds Not Justified; Not Effective)	70/8549 70/8550	Fulford Parish Council
Distribution Para 13.12	Makes passing reference to Monks Cross and gives no real indication that Monks Cross North will be required for employment uses. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9657 2689/9658 2689/9659 2689/9660	Monks Cross North Consortium
Distribution Para 13.15	Should be altered to refer to Grimston Bar, not Northminster Business Park. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2687/9669 2687/9670 2687/9671	Tangent Properties

Chapter 14 Retail

Paragraph etc	Supporting Comments	Ref.	Name
General	Welcome and support approach taken.	449/9722	Tesco Stores Limited
Targets	Support most of targets and particular target to deliver increase in convenience floorspace in City Centre, District Centres and smaller centres by 2031.	449/9723	Tesco Stores Limited
Policy CS17	Increased commitment to sequential development is welcomed.	110/8608	York Civic Trust
	Support.	242/8658	English Heritage Yorkshire and the Humber Region
	Supports recognition that out of centre retail development is appropriate where satisfies sequential approach and impact on existing allocations.	370/8990	Monks Cross Shopping Park Trust
Explanation Paragraph 14.02	Identification of York Designer Outlet as out of centre retail destination supported.	2951/9210	York Designer Outlet

Section 14: Retail

Paragraph etc	Comments and Objections	Ref.	Name
General	Should indicate what strategy is in place in event proposals for Castle Piccadilly scheme cannot proceed. (Comment)	196/9703	York & North Yorkshire Chamber of Commerce
	Concerns about threats posed by proposed retail expansion of Monk's Cross in particular, which would also result in an increase in emissions (from travel and from buildings). Support findings of Retail Study and trust that CS will embed these, thus limiting any further out-of-town development in retail sector. (Comment)	2898/9160	York Environment Forum
Strategic Objective(s)	In eventuality of the Monks Cross Community Stadium retail development being approved, the objectives set out will need to be completely revised for the strategy to be sound, taking account of the impact on viability of major new retail developments in the city centre. (Grounds Not Effective)	204/8617	Cllr A D'Agorne
Targets	Targets would need amended timescales for developments and review whether retail allocation in York Central is still justifiable. (Grounds Not Effective)	204/8618	Cllr A D'Agorne
Policy CS17	Should state what strategy will apply to future growth of out of centre destinations. Policy for Designer Outlet should also be set out but should be treated differently to Clifton Moor and Monks Cross because of its character and Green Belt location outside ring road. Should include specific policy for Designer Outlet namely "No significant expansion of the Designer Outlet or additional facilities will be supported". (Grounds Not Justified; Not Effective)	70/8551 70/8552	Fulford Parish Council
	Contradiction between reasoned justification to spatial approach to out of centre retail development, and Policy itself. Policy does not provide requisite flexibility in terms of two retail sites within City Centre. Policy is unduly inflexible, given it prescribes scale of floorspace for 2 (of 3) retail expansion areas in City Centre (namely Castle Piccadilly and York Central). Monks Cross deserves greater recognition within CS. Plan's approach, which is overly restrictive of future development at Monks Cross is without planning foundation. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	370/8978 370/8979 370/8980 370/8981	Monks Cross Shopping Park Trust
	Large-scale development of Castle Piccadilly for retail will be inappropriate to historical context of surrounding buildings. Location of this site is unsustainable due to existing transport infrastructure of York City Centre. Phasing aspect of Policy is too restrictive and unnecessary. Retail impact assessment for a retail development between 200 and 600 sq m gross in a new Local Centre in City of York is excessive and not required as retail impact of a development of this scale would be minimal. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	449/9724 449/9725 449/9726 449/9727	Tesco Stores Limited

Section 14: Retail Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS17 Continued	Object to inclusion of specific quantum of gross floorspace for retail, services and food and drink uses within CS and request this is removed from policy and targets. These will most appropriately be determined through undertaking of a detailed assessment of retail capacity, need and impact as part of masterplanning and planning application exercises. Proposed level of detailed control is inappropriate for CS and not justified by evidence base. (Grounds Not Justified)	525/9032	Associated British Foods plc
	Retail strategy should acknowledge potential of established York Designer Outlet to contribute to meeting identified needs for additional comparison floorspace for City, and identify it in Policy as part of retail hierarchy. Insert a further criterion after 'Phase 2' as follows: ii. "Additional comparison floorspace could be supported at the York Designer Outlet subject to detailed impact testing." Criteria ii and iii would become criteria iii and iv respectively. (Grounds Not Justified)	2951/9209	York Designer Outlet
Explanation			
Figure 14.1	No recognition of the different character of the Designer Outlet compared to Monks Cross and Clifton Moor. (Grounds Not Justified; Not Effective)	70/8553 70/8554	Fulford Parish Council
Para 14.06	No justification to allow development such as convenience stores, banks and building societies to be directed to the Outlet. Its location outside the ring road would not be sustainable. (Grounds Not Justified; Not Effective)	70/8555 70/8556	Fulford Parish Council
	Contradiction between reasoned justification to spatial approach to out of centre retail development, and Policy. Negatively worded and restricts further non-food retailing in out of centre locations. This approach is not consistent with PPS4, which is permissive of out of centre retail where sequential and impact tests can be satisfied. It is overly restrictive and should be redrafted to be consistent with Policy. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	370/8982 370/8983 370/8984 370/8985	Monks Cross Shopping Park Trust
	Consequent upon suggested amendment to Policy CS1, Paragraph should be amended by adding at end, "The amount of comparison floorspace in these locations will not be expanded, except for at the York Designer Outlet (subject to retail impact assessment)." (Comment)	2951/9211	York Designer Outlet

Chapter 15 Sustainable Transport

Paragraph etc	Supporting Comments	Ref.	Name
General	Support.	2958/9342	University of York
Strategic Objective(s)	Strong commitment to improving accessibility, permeability and connectivity on foot, by bicycle and public transport is welcome.	2946/8857	GARLAND (The Garden and Landscape Heritage Trust)
Targets	Supports reference that these are aspirations rather than minimum requirements.	2953/9301	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Policy CS18	Supports assumption that Access York Phase 1 Major Scheme will be implemented and implementation of improvements to A1237/A59 roundabout, A59 Park and Ride and bus priority on A59.	525/9046	Associated British Foods plc
	Support in particular delivery of Access York Phase 1; also support in principle proposals to increase capacity of A1237 ORR through dualling.	2537/9651	D; L Lancaster; Philiskirk & Sons Ltd; Burneston Family
Policy CS18 CS18i The Location of Development	Supports recognition that in some circumstances development will not be able to achieve standards.	2953/9302	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)

Section 15: Sustainable Transport

Paragraph etc	Comments and Objections	Ref.	Name
General	Levels of growth are assumed to be feasible without consideration of existing capacity constraints of the outer ring road. (Grounds Not Justified; Not Effective; Not Legally Compliant)	65/8489 65/8490 65/8491	Copmanthorpe Parish Council
	Unsound because inextricably linked to LTP3 which was produced on assumption that no urban extensions would be required. Strategy does not address cumulative impact of future development on existing infrastructure to east of the City. (Grounds Not Justified; Not Effective)	70/8557 70/8558	Fulford Parish Council
	Current bus service only serves properties close to The Village, York Road and Strensall Road. Many other parts of Strensall/Towthorpe fall outside the 5 minutes walkable designation. There is no designated cycle route between Strensall/Towthorpe and the A1237. If further development is considered within Strensall/Towthorpe consideration needs to be given to the expansion of public transport.	85/8587	Strensall with Towthorpe Parish Council
	Why not use River Ouse as a method of travel by extending Park & Ride at Rawcliffe Bar to pick up and drop off passengers from City Centre which already has landing pontoons for boats to a floating pontoon on River at Rawcliffe Bar (Object No Grounds Stated) Like to see bus companies fit bicycle racks to front of some buses to allow cyclists to be able to transport bicycles to and from major bus and cycle routes around York. (Comment)	1365/9733 1365/9734	Mr D Skilbeck
	Warning of increased congestion delay time in the event of insufficient future investment raises concerns ahead of next Local Transport Plan and illustrates point about housing targets. Higher housing targets will actually increase the pressure on York's transport infrastructure and exacerbate the already significant delays across the local transport network, which in turn will only serve to strangle economic growth in the City	2726/8747	Mr J Sturdy MP
	If 16000 new dwellings were all to be occupied by people driving at least one car, plans for York's transport will fail. (Object No Grounds Stated) Having public transport infrastructure to support development is vital. Encouraging modal shift to sustainable transport will provide some but not all of answers. Favours a fundamental re- envisaging of York's transport system so that ultimately city's core is car-free. (Comment)	2898/9177 2898/9665	York Environment Forum
	Bus Congestion - Like other tourist cities, in adopting an 'anti-car' strategy York has become clogged not by cars but by buses. Many of these are too frequent, under utilised and unsuitable. 'City Tour' buses have been licensed to too many operators, with result that it's not unusual to see two or three following each other round, each with just a few people on board. Routes such as 'Park and Ride' and 'University' are too frequent for much of the day, and often carry only a few passengers. 'Bendy buses' are least suitable vehicles for York's narrow streets' and do not have all that many more seats than a conventional single decker.	2912/8387	Mr C O Jilbert

Section 15: Sustainable Transport Continued

Paragraph etc	Comments and Objections	Ref.	Name
General Continued	Bus Station - Lack of a proper bus station is a serious shortcoming. Area outside railway station is scruffy, and area in Rougier Street is both scruffy and, late at night, most unpleasant, due to its close proximity to numerous nightclubs. Cycling - Amounts currently being spent on promoting cycling within the city are excessive and could be better spent. Not everyone can, or wishes to, cycle, no matter how many routes are created or how much coloured paint is put on the road.	2912/8387	Mr C O Jilbert Continued
	Strategy perpetuates illegal levels of air pollution and predicts that they will get worse. Fails to set any target for cutting greenhouse gas emissions and is likely to lead to an increase. Fails to discuss health impacts of air pollution or proposals for reducing incidence of health problems. Likely to lead to more people suffering ill health due to predicted rise in traffic levels. Fails to mention nitrogen pollution from vehicles and damage caused to wider environment by this form of pollution. Plan needs to set clear targets and dates for bringing down air pollution levels and needs to be strengthened sufficiently to actually prevent traffic levels from rising. More radical measures need to be considered such as encouraging people to live closer to their workplace and some form of congestion charging. The plan needs to set clear targets for cutting greenhouse gas emissions from transport. (Grounds Not Effective; Not Consistent with National Policy)	2952/9213 2952/9214	Mr G Wallbanks
	Fails to refer to possible re-establishment of a railway line between Hull-Beverley-Market Weighton-Pocklington-Stamford Bridge and York. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2962/9453 2962/9454 2962/9455	Mr T Barnes
Strategic Objective(s)	In view of the National Transport Goals, the particular characteristics of York, and the impact, which the current transport strategy is having upon the City, amend introduction to read: - "To address the City's transport issues, including reducing the adverse impacts of transport upon the City, and deliver transport infrastructure ... etc"	242/8659	English Heritage Yorkshire and the Humber Region
Targets	Targets for reduction of travel delays will be ineffective either as measures of the strategic objectives or in achieving following key themes in LTP3:- Quality alternatives; Behavioural change; Transport emissions; and Public streets and spaces. Alternative indicators are:- Local bus passenger journeys originating in the authority area; Bus services running on time; Percentage of workforce travelling to work by public transport/bike/walking/car sharing in the ten largest employers within the City; Percentage of daily journeys for study within City made by public transport/bike/walking/car sharing. (Grounds Not Effective)	204/8619	Cllr A D'Agorne
	Targets for strategic infrastructure schemes Phase 3 not sound in respect of outer ring road improvements as proposed increased road capacity inconsistent with climate change strategy, air quality strategy and the Climate Change Act 2008. Suggests "achieving effective zero traffic growth by 2031 compared with 2011 levels. (Grounds Not Consistent With National Policy)	204/8620	

Section 15: Sustainable Transport Continued

Paragraph etc	Comments and Objections	Ref.	Name
Targets Continued	Strategic Objectives include supporting and implementing behavioural change and providing quality alternatives to the car. However, nowhere is the effectiveness of these policies being measured. Insert additional Target along following lines: - “A x% reduction in the number and size of vehicles in the City Centre compared to 2011”.	242/8660	English Heritage Yorkshire and the Humber Region
Policy CS18	Unsound because almost wholly based on evidence of LTP3 that was produced before areas A and B were chosen as urban extensions. (Grounds Not Justified; Not Effective)	70/8559 70/8560	Fulford Parish Council
	Cycling and walking facilities should be employed alongside River Ouse as part of British Sugar and York Central sites. (Comment)	79/8576	Nether Poppleton Parish Council
	Recommend provision of cycle and pedestrian facilities along side River Ouse as part of British Sugar and York Central sites to provide safe and vehicle free access to City.	86/8594	Upper Poppleton Parish Council
	Concerned that much needed improvements to Strategic Road Network, particularly western and northern outer ring road are left to latter stages of Plan and then only as selected link upgrades. Must recognise that strategic road network is essential to future economic well-being. This must be recognised and taken account of in Policy. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	196/9704 196/9705 196/9706	York & North Yorkshire Chamber of Commerce
	Currently full potential of River Ouse is under utilised with access and connectivity issues with main city centre. Policy fails to acknowledge the sustainable transport role of the river both in terms of use by boaters and pedestrians/cyclists on the riverbank. Reference needs to be made to this to meet the strategic objectives and targets. (Grounds Not Effective)	227/8629	British Waterways (Yorkshire Office)
	Does not address issue of long distance commuting into York from neighbouring authorities and the implications of this on the strategic road network. None of the measures outlined would do anything to significantly relieve capacity issues on the A64 created by future development. Need to insert references to the following into the Strategic Transport Priorities: - Reference to the importance of travel plans; measures to reduce congestion along the A64 and at junctions on the A64; Ongoing work on updating York’s Saturn Model and how this will inform measures necessary to address longer distance commuting from neighbouring authorities; and work with neighbouring authorities to identify and address issues affecting transport infrastructure capacity and provision including the strategic road network. (Grounds Not Effective)	2434/8699	Highways Agency
	No indication of measures to achieve up to 85% reduction in travel delays by providing large increase in bus services. No plans and timescale for building bus station adjacent to railway station. Should include measures to achieve these by providing adequate subsidy for public transport. More bus services required. (Grounds Not Justified)	2469/8424	Ms M Nelson

Section 15: Sustainable Transport Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS18 Continued	Expansion and relocation of Askham Bar site may not be wholly required. Intention to provide extra buses on the Askham Bar route where there are limited stops means that city network will become overloaded as Poppleton Park and Ride buses take same Skeldergate route. No studies have been produced to justify improved connectivity between towns and cities of the Leeds City Region. Provision of an A59 Park and Ride site appears to be in conflict with other plans for enhanced transport for the York North West site. Presence of the railway is the key to accommodating long/medium distance journeys on A59 corridor. Growing concerns that Park and Ride is close to its “sell by date”. Policy should accept or be based on alternative or negative aspects of park and ride or more radical measures to achieve modal shift. (Grounds Not Effective)	2948/8885	Mr R Healey
Policy CS18 – Para i The Location of Development	Inflexible and does not consider needs of residents of rural areas. Should be amended to provide flexibility for sites that are located close to strategic road network. Suggest inserting after, “.... locations which are” - “well located in relation to the strategic road network, or are...”. (Grounds Not Effective)	515/9542	Harworth Estates
	Decision to support Northminster Business Park runs counter to this policy. Not served by public transport network. Located at some distance from nearest bus stop and not within a comfortable walking distance. In contrast, Grimston Bar is within 5 minutes walk of one of the city’s park & ride sites and located alongside a key public transport corridor. (Comment)	2687/8736	Tangent Properties
Policy CS18 – Para ii Strategic Infrastructure Improvements	Delaying roundabout improvements to the A1237 for 5 to 10 years on Phase 2 2016 – 2021’s timetable does not and will not deliver any reduction in delays in an acceptable time frame. Should be brought forward to 2011 – 2015. (Grounds Not Effective)	88/8605	Wigginton Parish Council
	Ability for local rail services to serve public transport needs of City almost ignored. Development on west side of City is highlighted as generating substantial extra car journeys, yet no mention made of how a re-opened station at Copmanthorpe might help alleviate these problems. No mention made of how a re-opened York-Beverley line might contribute to improved environment and traffic flows on east side. Does not necessarily need tram-train to reduce traffic flows in northwest of City. Increased frequency, speed improvements, modern rolling stock and re-instatement of double track would go a long way to achieve service improvements. No mention of re-opening of Allerton Station. Would form an excellent P & R station for traffic off A1 (M). As tram-train concept does not seem to be extended with street running in City itself, support seems superfluous.	2123/9574	Mr R Bastin
	Would like to see inclusion of play space for children and young people at new park and ride sites considered.	2944/8849	York Youth Council

Section 15: Sustainable Transport Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS18 iii Smarter Choices and Demand Management for Travel	The outcome of smarter choices and demand management should not simply be to reduce congestion. It should, also seek to reduce the numbers (and types) of vehicles using York's roads, especially in its historic core. Amend first sentence of this part of Policy to set out what reductions in the number of vehicles using the road system and their impacts are expected as a result of these measures.	242/8661	English Heritage Yorkshire and the Humber Region
	If more people are to be attracted to buses must be made quicker and more reliable. Traffic levels must be reduced and if only way to achieve this is by work place parking charge and/or congestion charging so be it. In residential areas bus timings are affected by congestion caused by on-street parking.	2123/9573	Mr R Bastin
Policy CS18 – Para iv Protection for Residential Areas and City Centre Accessibility	As status of document City Centre Movement and Accessibility Framework is unknown, it is not a document to which specific reference should be made within the Policy itself. a) Delete "and the outcomes of the City Centre Movement and Accessibility Framework" b) Include a section within the Explanation referring to the fact that the Council is preparing a City Centre Movement and Accessibility Framework and the possible implications for the Core Strategy.	242/8662	English Heritage Yorkshire and the Humber Region
	Policy as written pre-determines outcome by stating that access restrictions will be implemented. This should be deleted unless there is robust and credible evidence to justify its inclusion. If there is sufficient evidence, then should be re-worded as follows: "To ensure that the quality of life of residents in existing areas of the City is not adversely affected by development growth, access restrictions may be implemented as part of the consideration of individual development sites." (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9303 2953/9304 2953/9305	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Policy CS18 v Strategic Allocations & Future Areas of Search for Urban Extensions	Text should be amended to include an Urban Extension at Northfield along with the Area C expansion at Northminster, as these proposals will affect same transport and other physical infrastructure. (Comment)	2537/9652	Lancaster & Burneston Family
Explanation Para 15.04	Tram/train - seen as "longer term" and outside this time frame. Need to explore creative ways of bringing in money. If developers are prepared to spend millions on floorspace at Monks Cross, what about spending on a tram link to the City Centre? If they're so confident that shoppers will still want to visit the City Centre, why not put their money where their mouth is and invest?	551/8375	Constructive Individuals

Chapter 16 Air Quality

Paragraph etc	Supporting Comments	Ref.	Name
Targets	Support.	2953/9306	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)

Section 16: Air Quality

Paragraph etc	Comments and Objections	Ref.	Name
General	<p>Strategy perpetuates illegal levels of air pollution and predicts that they will get worse. Fails to set any target for cutting greenhouse gas emissions and is likely to lead to an increase. Fails to discuss health impacts of air pollution or proposals for reducing incidence of health problems. Likely to lead to more people suffering ill health due to predicted rise in traffic levels. Fails to mention nitrogen pollution from vehicles and damage caused to wider environment by this form of pollution. Plan needs to set clear targets and dates for bringing down air pollution levels and needs to be strengthened sufficiently to actually prevent traffic levels from rising. More radical measures need to be considered such as encouraging people to live closer to their workplace and some form of congestion charging. The plan needs to set clear targets for cutting greenhouse gas emissions from transport (Grounds Not Effective; Not Consistent with National Policy)</p>	<p>2952/9215 2952/9216</p>	<p>Mr G Wallbanks</p>
Strategic Objective(s)	<p>Fails to specify as a key objective achievement of early compliance with European Directive on Air Quality. Objective should read “LDF will play a key role in achieving early compliance with the health based thresholds for NO2, NOx, PM10 and PM2.5 levels as specified by the European Directives on Air Quality, in conjunction with measures within the Low Emission Strategy and the Local Transport Plan. (Grounds Not Effective; Not Consistent With National Policy) Opening statement should read “The LDF will play a key role in early compliance with the European Directives on Air Quality by..” (Grounds Not Consistent With National Policy; Not Legally Compliant)</p>	<p>204/8621 204/8622 204/8622 204/8487</p>	<p>Cllr A D'Agorne</p>
Targets	<p>Reference to “five years averages” not sound as fails to meet requirements of European Directive on Air Quality. Third bullet point should read; “Year on year improvements in annual average readings for air quality at relevant locations within the AQMAs ultimately leading to the revocation of these areas as compliance with the annual average and hourly average legal requirement maxima is achieved and sustained”. (Grounds Not Effective; Not Consistent With National Policy)</p>	<p>204/8623 204/8624</p>	<p>Cllr A D'Agorne</p>
Policy CS19	<p>If the very high projections for employment and housing growth are implemented the objective to reduce emissions to air and improve air quality will not be achievable. (Grounds Not Justified; Not Effective)</p> <p>Paragraph i should define “acceptable” to be sound. Propose “development will only be permitted if it shown that mitigation will result in a decrease, or at most, no increase in annual average levels of NO2 or PM10 at relevant locations (with AQMAs) that are already exceeding the EU objective levels”. (Grounds Not Consistent With National Policy; Not Legally Compliant)</p>	<p>70/8561 70/8562 204/8625 204/8626</p>	<p>Fulford Parish Council Cllr A D'Agorne</p>

Section 16: Air Quality Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS19 Continued	Parts ii and iii should only apply to specific development proposals, which fall within an Air Quality Management Area as referred to in target and as shown in Figure 16.1. Policy should be more streamlined so that an assessment is dependant on type of development proposed and its location. Question whether CS should be stipulating what supporting documents need to be submitted with a planning application. This can and should be set out in a local validation checklist. Parts ii and iii of the policy should be deleted and a local validation checklist should set out criteria for requiring an air quality management assessment and this can be linked to policy. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9307 2953/9308 2953/9309	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Explanation Para 16.02 to 16.05	Not sound, as it makes no reference to the role of LTP3 and transport planning in reducing vehicle emissions. Suggest adding new paragraph and renumber. “ The Local Transport Plan (LTP3 and subsequent plans) will take account of the need to improve and maintain good air quality in the City, giving priority to development of sustainable transport, measures that minimise the need to travel and make walking, cycling and public transport safe, attractive and convenient”. (Grounds Not Justified; Not Effective)	204/8627 204/8628	Cllr A D'Agorne

Chapter 17 Green Infrastructure

Paragraph etc	Supporting Comments	Ref.	Name
General	Welcomes Green Infrastructure and production of SPD and associated targets.	4/8886	Natural England Consultation Service
	Pleased to see that policy brings together protection of sites important for bio-diversity with contribution that Green Infrastructure makes to eco-system services.	49/8896	Yorkshire Wildlife Trust
	Supports initiative to protect Green Infrastructure.	85/8588	Strensall with Towthorpe Parish Council
	Generally supportive of contents of section.	458/9017	York Green Party (D Craghill)
Strategic Objective(s)	Support.	242/8663	English Heritage Yorkshire and the Humber Region
Targets	Support bullet point 3.	398/9002	Sport England
Policy CS20	Welcomes incorporation of geo-diversity.	4/8890	Natural England Consultation Service
	Support policy in particular 6 th Bullet Point.	5/9492	Environment Agency
	Support.	242/8664	English Heritage Yorkshire and the Humber Region
Explanation - Biodiversity Audit and Action Plan			
Paragraph 17.7	Support provision of buffer zones around SINC sites.	49/8899	Yorkshire Wildlife Trust
Paragraph 17.10	Welcomes reference to Lower Derwent Valley.	17/8456	East Riding of Yorkshire Council

Section 17: Green Infrastructure

Paragraph etc	Comments and Objections	Ref.	Name
General	Accessible Natural Greenspace Standard (ANGSt) appears to have been lost as an indicator. (Comment)	4/8887	Natural England Consultation Service
	Would like to see plans for council owned assets such as parks include management for biodiversity. (Comment)	49/8898	Yorkshire Wildlife Trust
	This includes green transport corridors. The need to protect main approach transport corridors from unsightly, inappropriate development needs to be included in LDF.	203/8616	Mrs J Hopton
	An umbrella or collective term is needed to cover natural, semi-natural and outdoor aspects of York. Suggests “the landscape dimension”. Would be useful to explain the interrelationship between natural and human dimensions of Green Infrastructure of York. Should be followed up by pointing out which Strategic Objectives, Targets, and parts of Policy CS20 relate to which dimension. The concept of 'buffer zones' can also be applied to places of cultural value and should be acknowledged. The European Landscape Convention should be given stronger recognition and incorporated into Strategic Objectives, Targets and as a separate entry under explanation. Need for a programme of supplementary education and learning in connection with the identification and assessment of landscapes and development of quality objectives.	2946/8855	The Garden & Landscape Heritage Trust
Strategic Objective(s)	Add new bullet point, “biodiversity underpins most if not all national and local authority planning guidance and policy making decisions”.	1656/8684	Mr B Otley
	Add bullet point about improving and sustaining quality of York's Green Infrastructure. The European Landscape Convention should be given stronger recognition and incorporated into Strategic Objectives, Targets and as a separate entry under explanation.	2946/8877	The Garden & Landscape Heritage Trust
Targets	The 8 th bullet point only mentions woodland creation. Would like to see targets to increase BAP habitat in general rather than just a measure of increase in woodland. (Comment)	49/8897	Yorkshire Wildlife Trust
	A key target here for future robust policy should be a commitment to develop a playing pitch strategy and keep it up to date with as a minimum reviews every 3 years. This would assist deliverability of this policy.	398/9003	Sport England
	Add, “We need to create a measurable assessment of parks and open spaces green management. To create maintenance and monitoring of the natural environment. To empower COYC staff to review current operations practices, encourage ownership of their role and how to administer cost effective improvements”. Then roll out training plans, monitor the new skills required. This will protect and enhance our natural environment.	1656/8685	Mr B Otley

Section 17: Green Infrastructure Continued

Paragraph etc	Comments and Objections	Ref.	Name
Targets Continued	Additional bullet point should be added relating to aim of improving and sustaining higher quality of Green Infrastructure. There should also be a separate statement about quality in the explanation. The European Landscape Convention should be given stronger recognition and incorporated into Strategic Objectives, Targets and as a separate entry under explanation.	2946/8878	The Garden & Landscape Heritage Trust
Policy CS20	Policy needs to acknowledge conflicts that can occur between sport and nature conservation and propose a policy steer on how they will be managed; for instance by local management plans to resolve any issues that may arise. (Grounds Not Effective)	398/9001	Sport England
	Section has one major omission. It makes scarcely a mention of food security. As energy prices rise and intensive agriculture continues to be a major contributor to greenhouse emissions it is essential to make plans to protect land for increased local food production and to encourage reductions in non-organic fertiliser use which contributes to global warming. LDF also needs to include policies and targets for reducing food waste, encouraging switch to more local, preferably organically-produced, food, and for helping farmers switch to renewable energy such as on-site Anaerobic Digestion, as well as to Organic, or at least lower-impact, production. Amend title of section to Green Infrastructure & Food Security. Point 1. Final bullet point – amend to read “supporting allotments and identifying productive land to encourage local food production and its benefits to education and healthy living, as well as its contribution to reducing carbon emissions, building low carbon neighbourhoods and increasing York’s resilience in the face of rising energy prices and global uncertainty”. (Grounds Not Effective)	458/9018	York Green Party (D Craghill)
	Add, “address the findings of emerging tree strategy”. Also no mention of ROWIP.	1656/8686	Mr B Otley
	Propose inclusion of Skate Park to west of the City in the Acomb area/North West Corridor. Acomb is among only six wards identified as “areas where there are currently large accessibility deficiencies and therefore opportunities for new provision”.	2943/8843	Carr Junior School Safe Skate Committee
	Object to inclusion of part 1 within policy, as it merely includes reference to Green Infrastructure Strategy, which is considered repetitive and unnecessary. Part 1 should be deleted. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9310 2953/9311 2953/9312	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
	Biodiversity Audit has not been published formally. Not possible to interrogate sites identified within Audit and provide feedback to Council. Whilst Policy refers to Green Infrastructure, it is not possible to validate this by reference to sites as shown on a plan. Biodiversity Audit should be formally published and subject to consultation such that evidence base can be read alongside CS. (Grounds Not Justified; Not Effective; Not Legally Compliant)	2963/9456 2963/9457 2963/9458	Mr T Cottrell

Section 17: Green Infrastructure Continued

Paragraph etc	Comments and Objections	Ref.	Name
Explanation			
Green Infrastructure Para 17.01	Add, “health and well-being, sequestration of carbon”.	1656/8687	Mr B Otley
Green Infrastructure Para 17.03	Add to last sentence, “business and tourism”.	1656/8688	Mr B Otley
Green Infrastructure Para 17.05	Add, “emerging tree strategy”.	1656/8689	Mr B Otley
Biodiversity Audit and Action Plan	Add a new paragraph, “A partnership that includes developers contribution (a voluntary measure) to trial biodiversity offsetting pilots, using a landscape biodiversity metric, a credit method to protect, enhance biodiversity”. (S106 conditions do not work effectively).	1656/8690	Mr B Otley
Biodiversity Audit and Action Plan Para 17.09	The European Landscape Convention should be given stronger recognition and incorporated into Strategic Objectives, Targets and as a separate entry under explanation.	2946/8880	The Garden & Landscape Heritage Trust
Open Space	No credible policy for stand-alone open space provision. In the absence of a credible strategy for this, targets and strategic objectives are aspirational words without substance. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2965/9486 2965/9487 2965/9488	Osbalwick Parish Council & Meadlands Area Residents Association
Open Space Para 17.15	Text needs to be written to inform that actual location of “strategic open space” will be a matter for Masterplanning. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9134 2689/9661 2689/9662 2689/9663	Monks Cross North Consortium
	No evidence to justify inclusion of 20% allowance, and what this percentage is a proportion of. Paragraph should be deleted. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9313 2953/9314 2953/9315	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)

Chapter 18 Sustainable Design and Construction

Paragraph etc	Supporting Comments	Ref.	Name
Strategic Objective(s)	Support.	449/9728	Tesco Stores Limited
Policy CS21	Supports policy.	5/9493	Environment Agency
	Welcome recognition in Criterion 1(iii) and 2 nd paragraph of Criterion 2 that there may be circumstances where not possible to incorporate onsite renewable energy or convert some existing buildings to deliver reduced energy consumption levels set out in policy.	242/8665	English Heritage Yorkshire and the Humber Region
Policy CS21 CS21 1 Renewable Energy	Support that applications for new major developments must incorporate on-site renewable/low carbon energy generation equipment to reduce predicted carbon emissions by at least 10%.	449/9729	Tesco Stores Limited
	Supports targets in policy.	515/9543	Harworth Estates

Section 18: Sustainable Design and Construction

Paragraph etc	Comments and Objections	Ref.	Name
General	York must build in local resilience, particularly with regard to future developments, new housing and infrastructure changes and effect these will have on lives of residents. Should be planning for transition to an economy that is not reliant on fossil fuels. While there is some discussion of potential for renewable energy and a commitment to building 'urban eco settlements', a citywide approach is necessary to ensure that York is attractive, secure, flourishing and resilient in years to come. (Comment)	2898/9151	York Environment Forum
	Cheap and Energy Efficient housing is what is most needed, and this plan does not allow these (Grounds Not Justified)	2933/8782	Mr J Rose
Targets	Strongly support general principle of targets but they are too unambitious to sufficiently support other policies including Climate Change Act, PPS1 and Council's own Climate Change Strategy. Support general approach in bullet 3, rising to carbon neutral requirements for new build by 2016/2019, but these requirements are only consistent with above policies if extended to all developments, not just those over a certain size. Micro-generations technologies are now highly developed, widespread, easily available and falling in price, so there is no reason for smaller sites to be excluded Bullet point 2: Amend to read: "All planning applications for new build or substantial refurbishment must incorporate on-site renewable/low carbon energy generation equipment to reduce carbon emissions by at least 10%." Bullet 3: Amend to read: "All developments to meet the following minimum requirements: etc." (Grounds Not Effective; Not Consistent With National Policy)	458/9019 458/9020	York Green Party (D Craghill)
	2 nd bullet point does not include reference to need to consider feasibility/viability. Either a clause needs to be inserted or word "must" needs to be replaced with "will aim to". (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9316 2953/9317 2953/9318	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Policy CS21	Given that SP1, SP2 and SP3 attempt to steer development away from flood zones, should be made clear this should not be applied to wind turbines. Could be included in Sustainable Design and Construction SPD. (Comment)	5/9494	Environment Agency
	Prescribing how developers comply with Government's target to achieve Zero Carbon Homes from 2016 onwards is contrary to Building Regulations and national planning policy. These are matters that are addressed under Building Regulations and it is up to developer how he meets these targets. Requirements in CS for how Carbon Compliance targets can be met on site should be deleted. Requiring developers to meet specified levels of <i>Code for Sustainable Homes</i> (other than element related to Part L for energy) in section 2 of policy must be justified with evidence to ensure that policy requirement does not compromise housing delivery.	165/8928	Home Builders Federation

Section 18: Sustainable Design and Construction Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS21 Continued	Policy is also unclear. It sets renewable energy targets to be met through either on or off site measures. Within same policy it also set targets for the Code. But Code already encompasses Part L carbon compliance standards. This will result in duplication and consequently policy is contrary to PPS2 and Planning and Climate Change Supplement to PPS1. Requirement in part 1 (iii) and part 2 that all developments must submit a Sustainable Energy Statement should be deleted as is contrary to Planning and Climate Change Supplement to PPS1. These are matters addressed through securing Building Regulations Approval. Policy is unproven, unhelpful, and confused. It will militate against housing delivery and should be deleted. (Not Consistent with National Policy)	165/8928	Home Builders Federation Continued
	Concerned onerous requirements of Policy will discourage development. Policy repeats and duplicates matters covered by other statutory codes contrary to advice in PPS1. Requirements for carbon compliance targets to be met on site should be deleted. Requirement for all development to submit a Sustainable Energy Statement should be deleted, as it is contrary to guidance in Planning and Climate Change Supplement to PPS1. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	196/9707 196/9708 196/9709	York & North Yorkshire Chamber of Commerce
	Phrases such as “unless it can be demonstrated that it is not feasible or viable” weaken document and can be used to avoid meeting urgently required standards and are unnecessary. These should be dropped. If a development is not worthwhile with inclusion of measures to reduce greenhouse gas emission by just 10%, then it should either not go ahead at all, or be completely redesigned. 1. Renewable Energy iii) should read, “All developments must submit a Sustainable Energy Statement as part of the planning process.” 2. Sustainable Design & Construction – second line – delete “(where appropriate)” Second paragraph delete ‘unless it can be demonstrated that it is not feasible or viable’. (Grounds Not Effective)	458/9021	York Green Party (D Craghill)
	Policy not acceptable and goes beyond what is required by regulations and guidance at national level. In respect of smaller schemes the requirement to consider reducing emissions by 10% or more through renewables/energy efficiency and also an increasing Code for Sustainable Homes level year on year for schemes over 10 dwellings is both unreasonable and unrealistic. Small site threshold should be increased to 15 units and stepping up requirement to Code Level 4 and Zero Carbon removed. (Grounds Not Justified; Not Effective; Not Consistent With National Policy; Not Legally Compliant)	2932/8774 2932/8775 2932/8776 2932/8777	Matbo Ltd
Policy CS21 – 1. Renewable Energy	Renewable electricity capacity of 38.7mw unrealistic as not appropriate to have large structures (Wind Turbines) higher than York Minster or which would interfere with views of City. (Grounds Not Effective)	2927/8452	Copmanthorpe Wind Farm Action Group

Section 18: Sustainable Design and Construction Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS21 – 1. Renewable Energy Continued	Provides no guidance on spatial deployment of commercial scale renewable energy development within district. Cross-references to Spatial Principles provide no assistance in this respect. References to Spatial Principles should be deleted and a cross-reference to a new policy, which identifies more suitable locations for on shore wind energy development, introduced. Consideration should be given to including a spatial dimension to guidance. (Grounds Not Effective)	2956/8879	Banks Group
Policy CS21 – 1. Renewable Energy – Para iii	Conflicts with PPS22, which requires that renewable technology is viable, environmental and should not place undue burden on developers. The 10% reduction of carbon emissions can be achieved as part of building design and this has been omitted from the policy. (Grounds Not Justified; Not Consistent with National Policy)	164/9528 164/9529	Hogg Builders (York) Ltd
	Renewal Energy (iii) goes beyond Government requirements for individual sites. Government strategy is focusing on carbon emission reduction and not on-site energy generation. There will not be a national requirement to integrate CHP and district/block heating or cooling infrastructure. Current wording of Policy should be amended to reflect this.	525/9047	Associated British Foods plc
	Conflicts with PPS22 (Renewable Energy), which requires that renewable technology is viable in terms of its location, and should not place an undue burden on developers. The 10% reduction of carbon emissions can be achieved as part of improvements to building fabric through enhanced building design techniques and this has been omitted from policy. (Grounds Not Consistent with National Policy)	2950/9201	Taylor Wimpey UK Ltd
	Question whether CS should be stipulating what supporting documents need to be submitted with a planning application. This can and should be set out in a local validation checklist. 2 nd bullet point is not supported by Council's Renewable Energy Strategy Viability Study and should be deleted. For new development LPA should allow Building Regulations to deliver set reductions in CO2 emissions. CS should then set out what measures can be taken onboard to assist in moving towards zero carbon. Delete requirement for submitting a Sustainable Energy Statement as part of application process. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	2953/9319 2953/9320 2953/9321	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Policy CS21 – 2 Sustainable Design & Construction	Government has confirmed that all homes should have a mandatory Code for Sustainable Homes rating, whilst all other buildings require an Energy Performance Certificate as a minimum. It is not necessary to repeat guidance contained within Building Regulations relating to the Code for Sustainable Homes in DPDs. (Grounds Not Justified; Not Consistent with National Policy)	164/9530 164/9531	Hogg Builders (York) Ltd

Section 18: Sustainable Design and Construction Continued

Paragraph etc	Comments and Objections	Ref.	Name
<p>Policy CS21 – 2 Sustainable Design & Construction Continued</p>	<p>Inflexible and contrary to national policy. Therefore not most appropriate strategy for encouraging renewable/low carbon energy development. In its current form Policy would restrict development of renewable energy on North Selby site due to its rural location. Policy should not restrict renewable/low carbon energy developments which are located outside of City of York and should allow for such development in locations which make development viable, including where necessary, rural areas. This part should be removed. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	<p>515/9544 515/9545 515/9546</p>	<p>Harworth Estates</p>
	<p>Should include words “viable and practical” after words “The Sustainability Statement will need to demonstrate that where”. (Comment)</p>	<p>525/9048</p>	<p>Associated British Foods plc</p>
	<p>Overall purpose should be to encourage sustainable design and construction, and follow Government policy with regard to Code for Sustainable Homes. Code for Sustainable Homes (and Building Regulations) control sustainable construction and no reference is needed in policy. Supplement to PPS 1 requires that local requirements for sustainable buildings must, “ensure what is proposed is evidence-based and viable”. No such assessment appears to have been undertaken. (Grounds Not Justified; Not Consistent with National Policy)</p>	<p>546/9062 546/9063</p>	<p>Miller Homes</p>
	<p>Not consistent with national policy and Government's approach to residential zero carbon. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)</p>	<p>2689/9139 2689/9140 2689/9141 2689/9142</p>	<p>Monks Cross North Consortium</p>
	<p>Government has confirmed that all homes should have a mandatory Code for Sustainable Homes rating, whilst all other buildings require an Energy Performance Certificate as a minimum. It is not necessary to repeat guidance contained within Building Regulations relating to Code for Sustainable Homes in DPDs. (Grounds Not Consistent with National Policy)</p>	<p>2950/9202</p>	<p>Taylor Wimpey UK Ltd</p>
	<p>Residential Developments prescribed requirements are not adequately justified. AHVS has only tested Level 3 and therefore CS is proposing uncertain targets which may not be feasible at time stated, have not been subject to robust viability testing. No local evidence that would warrant and allow policy requirement to reach any of CfSH levels beyond level 3. 1st bullet point should be replaced with following: “All development should comply with Building Regulations as at the time of construction unless otherwise agreed in writing by the NHBC prior to construction”. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)</p>	<p>2953/9322 2953/9323 2953/9324</p>	<p>Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)</p>
<p>Explanation</p>			
<p>Renewable Energy Para 18.06</p>	<p>Does not include energy from food waste/anaerobic digestion.</p>	<p>1656/8691</p>	<p>Mr B Otley</p>

Section 18: Sustainable Design and Construction Continued

Paragraph etc	Comments and Objections	Ref.	Name
Renewable Energy Para 18.07	The use of “large” wind is not justified within Green Belt because:- would visually detract in the landscape; would impact on flora and fauna; would not necessarily benefit York because electricity produced would be connected to the wider grid. Should be a statement to effect that any wind turbine located within the Green Belt or likely to impact upon it must not exceed a height from ground level to the turbine hub of 30metres. (Grounds Not Justified)	87/8599	Wheldrake Parish Council
	Policy CS21 Criterion I (iii) recognises that that there may be circumstances in a historic City such as York where it may not be possible or practicable to incorporate on-site renewable energy or to convert some existing buildings to deliver the reduced energy consumption levels set out elsewhere in the Policy. This should be acknowledged within the justification. Add the following to this Paragraph: - “ Similarly, there may be circumstances where in order to protect those elements which contribute to the special character of the historic city where new developments within the City itself would not be able to accommodate renewable energy/low carbon energy generation with out harming these assets”.	242/8666	English Heritage Yorkshire and the Humber Region
	Given commitment to preserve local amenity and protect character and historic setting, potential installation of large-scale wind turbines on Green Belt land should not be contemplated. (Grounds Not Effective)	2927/8453	Copmanthorpe Wind Farm Action Group
Renewable Energy Para 18.08	Identifies a number of sites where there is potential for Combined Heat and Power (CHP) generation. Does not refer to potential of North Selby site. Should be amended to read: - “.... the Former North Selby Mine Site contains a significant 12 MW connection to the electricity grid and therefore also provides opportunities for renewable/low carbon energy development.” (Grounds Not Effective; Not Consistent with National Policy)	515/9547 515/9548	Harworth Estates

Chapter 19 Flood Risk

Paragraph etc	Supporting Comments	Ref.	Name
General	Support initiative to require all new developments to implement Sustainable Drainage Systems.	85/8589	Strensall with Towthorpe Parish Council
Targets	Support target for flood risk.	2953/9325	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Policy CS22	Supports particularly requirement to implement SuDS where feasible and need to demonstrate 30% reduction in brownfield run off rates and maintain status quo on greenfield sites.	320/8359	Yorkshire Water - Land Property & Planning

Section 19: Flood Risk

Paragraph etc	Comments and Objections	Ref.	Name
Targets	Add, “refer to emerging Flood Risk Management Plan”.	1656/8692	Mr B Otley
Policy CS22	Policy not the most appropriate when considered against reasonable alternatives. Thought process of final flood risk policy has not been provided. (Grounds Not Justified) Policy is worded in line with Council’s Strategic Flood Risk Assessment which is a departure from PPS25. Wording of paragraph under flood risk policy attempts to describe Sequential and Exception Tests that makes up stated classification tables. However paragraphs 19.2 and 19.3 fail to explain that Sequential Test should be applied first and passed before Exception Test is required. A brief reference to Sequential and Exception tests under policy heading is recommended for maximised clarity and suggest following additional text: - After subsequent updates “ to ensure the Sequential and Exception Test are applied where required”. Also recommend some minor additional wording regarding when a site-specific Flood Risk Assessment is required, specifically first bullet point, to make it more transparent in accordance with government policy: After “When allocating sites through the LDF process “which have passed the Sequential Test and require application of the Exception Test” (Not Consistent with National Policy)	5/9495 5/9496	Environment Agency
	Policy replicates national planning policy guidance and other legislation such as building regulation, is unnecessary and should be deleted.	2953/9326	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Policy CS22 - Flood Risk	Specific reference should be made to watercourses – Foss and its tributaries and the economic case for anti-flood investment to minimise reputational risk to York. (Grounds Not Effective)	88/8602	Wigginton Parish Council
Policy CS22 - Sustainable Drainage	Policy does not reflect LDF evidence base and is overly restrictive. Wording of first bullet point within box on Page 114 of CS should be amended to read: “all brownfield development in York will be required to demonstrate that there will be no increase in existing runoff rates.....” (Grounds Not Justified; Not Effective)	515/9549 515/9550	Harworth Estates

Section 19: Flood Risk

Paragraph etc	Comments and Objections	Ref.	Name
Explanation			
Para 19.02 & 19.03	Policy is worded in line with Council's Strategic Flood Risk Assessment, which is a departure from PPS25. Wording of paragraph under flood risk policy attempts to describe Sequential and Exception Tests that makes up stated classification tables. However paragraphs 19.2 and 19.3 fail to explain that Sequential Test should be applied first and passed before Exception Test is required. Paragraph 19.3 should be replaced with: - "Only after the Sequential Test has been applied and passed can the Exception Test be undertaken. Where development cannot be steered away from flood risk areas through the application of Sequential Test, the Exception Test is applied to ensure that any development going ahead is necessary for wider sustainable development reasons and is capable of adequately managing flood risk. PPS25 also acknowledges that in preparing LDFs, flood risk shall be considered alongside other spatial planning issues". (Grounds Not Consistent with National Policy)	5/9497	Environment Agency
Para 19.05	Should also refer to attention to smaller watercourses and risk to the City's reputation. (Grounds Not Effective)	88/8603	Wigginton Parish Council

Chapter 20 Sustainable Waste Management

Paragraph etc	Supporting Comments	Ref.	Name
Policy CS23	Broadly support.	608/8677	Yorwaste Ltd
Policy CS23 Paragraph iii	Support this part of policy.	5/9498	Environment Agency

Section 20: Sustainable Waste Management

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS23	Seek clarification of meaning of “safeguard” with respect to protecting exiting facilities and how this would translate into handling of planning applications. (Comment)	608/8678	Yorwaste Ltd
	Does not include policies for provision of secondary and recycled aggregates in accordance with RSS. No mention of construction and demolition waste. Should be amended to deal specifically with secondary and recycled aggregates, which has different, needs to other waste management facilities. Seek recognition of need for permanent provision locally to cater for arisings from smaller sites and household development. (Grounds Not Effective; Not Consistent with National Policy) See Representation for addition to Policy	2939/8801 2939/8802	Mineral Products Association
Policy CS23 – Para iii	Should not require waste management developments, particularly those which would generate renewable/low carbon energy, including heat, to be in conformity with Spatial Strategy, as it would restrict development of these uses outside of City of York. Amend to read: - “identifying through an appropriate Development Plan Document, suitable alternatives for municipal waste, as required during the lifetime of the plan. This must meet operational requirements of any facility. Priority will be given to: - Existing waste sites; Established and proposed industrial estates, particularly where there is the opportunity to co-locate with complementary activities, reflecting the concept of “resource recovery parks”; Previously developed land; and Redundant buildings and their curtilages in rural areas, if suitably accessible for purpose.” (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	515/9551 515/9552 515/9553	Harworth Estates
Explanation			
Waste Streams and Associated Waste Tonnages Para 20.10	Not clear what provision will be made for much larger quantities of construction and demolition waste managed by private sector. (Grounds Not Effective; Not Consistent with National Policy)	2939/8803 2939/8804	Mineral Products Association
Waste Sites and Facilities - Waste Private Finance Initiative Paragraph 20.14	EfW proposals rely on waste figures projected from 2002 which overestimated amount of waste produced and underestimated proportion that would be recycled. (Grounds Not Justified) Commitment to burn a given amount of residual waste every year difficult to meet given current trends in waste arisings. (Grounds Not Effective) Inconsistent with PPS10 as would discourage waste being moved up hierarchy. Inconsistent with “ National & Regional Guidelines for Aggregates Provision in England” (June 2003), which states there is no target for York to supply aggregates. (Not Consistent with National Policy)	458/9022	York Green Party (D Craghill)
		458/9023	
		458/9024	
Waste Sites & Facilities – Harewood Whin Waste Management Facility Para 20.18	Does not reflect Yorwaste’s Strategic Development Plan for Harewood Whin, namely to import waste from other regions. Paragraph should make it clear that Harewood Whin is a facility to deal with waste arising from the City of York and North Yorkshire County Council only. (Grounds Not Legally Compliant; Not Justified; Not Consistent with National Policy)	82/8421 82/8422 82/8423	Rufforth with Knapton PC

Chapter 21 Minerals

Paragraph etc	Supporting Comments	Ref.	Name
General	Welcomes safeguarding of coal bed methane.	2934/8783	Dart Energy (Europe) Ltd
Policy CS24	Minimising consumption of minerals in construction is laudable.	2939/8800	Mineral Products Association
Explanation Coalbed Methane Paragraph 21.07	Supports approach and identification of limited legacy of past coal mining activity at North Selby Mine.	397/8361	The Coal Authority Planning & Local Authority Liaison Department

Section 21: Minerals

Paragraph etc	Comments and Objections	Ref.	Name
Targets	References to Coal Bed Methane should be amended to include all forms of unconventional gas.	2934/8784	Dart Energy (Europe) Ltd
Policy CS24	<p>References to Coal Bed Methane should be amended to include all forms of unconventional gas.</p> <p>i) Minimising consumption of minerals in construction for major projects is laudable, but already covered by regulation for projects valued at over £300,000. Unless ‘major’ is defined as being below this figure, policy will not have any impact at all and will thus be ineffective. Policy could refer to specification of secondary aggregates, or other substitutes, and not just the reuse of materials found on site, which does not appear to be referred to elsewhere in CS under sustainable design and construction. Policy could also usefully refer to prior extraction of minerals before development in order not to sterilise them. (Grounds Not Effective; Not Consistent with National Policy)</p> <p>ii) It is not best practice to merely refer to intention to safeguard minerals in CS. Should refer to future designation of Mineral Safeguarding Areas (MSA) in accordance with guidance of BGS (Mineral safeguarding in England: good practice advice, Oct 2011). Proposed MSA should include urban areas and how designation will deal with proximal development., that is, development which although not underlain by the resource, would by its proximity to it, constrain future mineral extraction.</p> <p>iii) Requirement to show need for mineral extraction sites unclear and thus ineffective as not apparent how a prospective developer would demonstrate need. There is general requirement on an mpa to “aim to source mineral supplies indigenously, to avoid exporting potential environmental damage, whilst recognising the primary role that market conditions play”. This means that if mineral is present in an area, policy should allow for its development (if environmentally acceptable) if there is market demand, irrespective of an official apportionment. CS could meet this by designating MSA or a proportion of it, in a subsequent DPD as an Area of Search for minerals in absence of detailed knowledge of resource and lack of an apportionment and should flag up this approach in policy/supporting text. Requirement of future mineral sites not to compromise SP2 is not effective and not flexible. Not clear to what “future occupiers and users...” refers. Is this a reference to land, which is yet to be developed? (Grounds Not Consistent with National Policy)</p> <p>See Representation for deletions and additions to Policy</p>	<p>2934/8785</p> <p>2939/8796 2939/8797</p>	<p>Dart Energy (Europe) Ltd</p> <p>Mineral Products Association</p>

Section 21: Minerals Continued

Paragraph etc	Comments and Objections	Ref.	Name
Explanation			
General	There is general requirement on an mpa to “aim to source mineral supplies indigenously, to avoid exporting potential environmental damage, whilst recognising the primary role that market conditions play”. This means that if mineral is present in an area, policy should allow for its development (if environmentally acceptable) if there is a market demand, irrespective of an official apportionment. CS could meet this requirement by designating MSA or a proportion of it, in a subsequent DPD as an Area of Search for minerals in absence of detailed knowledge of resource and lack of an apportionment and should flag up approach in policy/supporting text. (Grounds Not Consistent with National Policy) See Representation for deletions and additions to Text.	2939/8799	Mineral Products Association
Coalbed Methane Para 21.06 and 21.07	Section should also include the extraction of methane gas from carboniferous and other identified sources strata by the fracking process. (Grounds Not Effective)	87/8598	Wheldrake Parish Council
	Should be re-titled to read “Coal Bed Methane and Unconventional Gas” and references extended to include all forms of unconventional gas.	2934/8786	Dart Energy (Europe) Ltd

Chapter 22 Infrastructure and Developer Contributions

Paragraph etc	Supporting Comments	Ref.	Name
General	Supports in general.	331/8975	Taylor Wimpey (UK) Ltd
Policy CS25	Supports policy and requirement to co-ordinate infrastructure delivery with new development.	320/8360	Yorkshire Water - Land Property & Planning

Section 22: Infrastructure and Developer Contributions

Paragraph etc	Comments and Objections	Ref.	Name
General	Unrealistic assumptions regarding ability of a scheme to provide affordable housing, S106, CIL and other regulatory and local policy demands will place plan at serious risk of being undeliverable. Council's objectives with regard to housing completions and its brownfield targets would not be met and plan would be unsound as it is undeliverable at point of adoption. (Grounds Not Effective)	165/8924	Home Builders Federation
	Council will need to establish, through an Infrastructure Plan or equivalent, what appropriate levels of infrastructure will be to support proposed level of development within district over plan period. This will help to inform at what level different development proposals will be expected to contribute to these infrastructure improvements. (Comment)	331/8976	Taylor Wimpey (UK) Ltd
	Welcome policy however adds little other than proposing a future policy will come forward. Will this be delivered through CIL? (Comment)	398/9004	Sport England
	Need to refer to biodiversity loss "emerging National Biodiversity Offsetting Pilots" a credit system. Alternate method to S106 conditions, as they do not work effectively.	1656/8693	Mr B Otley
	York must build in local resilience, particularly with regard to future developments, new housing and infrastructure changes and effect these will have on lives of residents. Should be planning for transition to an economy that is not reliant on fossil fuels. While there is some discussion of potential for renewable energy and a commitment to building 'urban eco settlements', a citywide approach is necessary to ensure that York is attractive, secure, flourishing and resilient in years to come. (Comment)	2898/9152	York Environment Forum
Policy CS25	Appropriate funding should be directed towards appropriate Parish Council where such a body exists. (Comment)	79/8577	Nether Poppleton Parish Council
	Where development takes place with existing village settlement boundaries any developer contributions to infrastructure should be directed to the appropriate Parish Council.	86/8595	Upper Poppleton Parish Council
	Not founded on a sufficiently robust and credible evidence base involving research and fact finding and based on an unsound Infrastructure Delivery Plan [IDP]. IDP does not demonstrate whether a viability assessment has been undertaken or if developers/funding sources can finance infrastructure required. In addition, no schedule of costs included within Table 5.1: Summary of Essential Strategic Infrastructure and fails to define an indicative amount that is required for each infrastructure element. Unreasonable to expect developers to contribution to strategic infrastructure if they are unaware of likely costs involved. Policy fails to establish any site size or dwelling thresholds for which contributions for off site infrastructure will be required. Statement in paragraph 22.2 as it is extremely onerous. Circular 05/2005 requires that obligations must be fairly and reasonably related in scale and kind to the proposed development and be reasonable in all other respects.	164/9532 164/9533 164/9534	Hogg Builders (York) Ltd

Section 22: Infrastructure and Developer Contributions Continued

Paragraph etc	Comments and Objections	Ref.	Name
Policy CS25 Continued	Statement that list in Para. 22.3 is not exhaustive appears to provide a mechanism for Council to ask for contributions for additional strategic infrastructure which has not been defined by a robust evidence base. Should be more prescriptive in proposed site specific and strategic infrastructure requirements in Para. 22.3. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	164/9532 164/9533 164/9534	Hogg Builders (York) Ltd Continued
	No evidence to demonstrate that requirements of policy will not render development unviable. (Grounds Not Justified; Not Effective; Not Consistent with National Policy)	196/9710 196/9711 196/9712	York & North Yorkshire Chamber of Commerce
	Infrastructure Delivery Plan does not demonstrate whether a viability assessment has been undertaken or if developers/funding sources can finance infrastructure required. No schedule of costs included within Table 5.1 and it fails to define an indicative amount that is required for each infrastructure element. Fails to establish any site size or dwelling thresholds for which contributions for off site infrastructure will be required. (Grounds Not Justified; Not Effective)	2950/9195 2950/9196	Taylor Wimpey UK Ltd
	Policy does not allow for viability to be taken into consideration. Following text should be inserted at the end of Policy: “It is accepted that there may be times when development viability may prevent proposals from meeting all of their necessary Planning Obligations. Where such a case is being made, applications will need to be accompanied by a detailed viability assessment, which will be considered by an independent assessor.”	2953/9327	Persimmon Homes & Barratt & David Wilson Homes (Yorkshire)
Explanation Para 22.02	Circular 05/2005 requires that obligations must be fairly and reasonably related in scale and kind to proposed development and reasonable in all other respects. Reasoned justification does not satisfy test and should set out that infrastructure contributions should only be made where there is an impact. If Council is seeking to implement a CIL charging scheme should clarify how developer contributions will be made. (Grounds Not Justified; Not Effective)	2950/9203 2950/9204	Taylor Wimpey UK Ltd
Explanation Para 22.03	Seek clear reference that sports facilities will be covered in a future contributions schedule or clarity that these are covered by the reference to ‘community facilities’. (Comment)	398/9006	Sport England
	Reference should be made to Strategic Road Network. (Grounds Not Effective)	2434/8700	Highways Agency
	Statement that list is not exhaustive appears to provide a mechanism for Council to ask for contributions for additional strategic infrastructure which has not been defined by a robust evidence base. Should be more prescriptive in proposed site specific and strategic infrastructure requirements. (Grounds Not Justified; Not Effective)	2950/9205 2950/9206	Taylor Wimpey UK Ltd
Explanation Para 22.06	Text on viability fails to appreciate that viability will have regard to all costs. (Grounds Not Justified; Not Effective; Not Consistent with National Policy; Not Legally Compliant)	2689/9143 2689/9144 2689/9145 2689/9146	Monks Cross North Consortium

Annex A Glossary of Terms

Paragraph etc	Comments and Objections	Ref.	Name
	Need to alter Historic to read Historic, built and natural environment.	1656/8694	Mr B Otley
	Character area on Figure 3.2 needs to be defined in Glossary. Add Natural Environment to glossary. Needs to be clarified what 'natural' means in relation to it. Also several other possible additions: - e.g. AAP; built environment; character area; community facilities; construction and demolition waste; eco-town principles; gateway; heritage assets; heritage strategy; kerb side recycling service; leisure; Local Strategic Partnership; municipal solid waste; open space; SPD; special historic and built environment; sustainable travel; waste streams; Without Walls. Clarification is needed in case of some of existing entries, such as: - Historic Environment; Public Realm.	2946/8868	The Garden & Landscape Heritage Trust

Annex C Bibliography

Paragraph etc	Comments and Objections	Ref.	Name
	Need to refer to: - Ecosystem Services; Natural Environment White Paper 2011; National Ecosystem Assessment (NEA) 2011; Biodiversity Offsetting Pilots; Making Space for Nature Report 2011.	1656/8695	Mr B Otley

**Appendix I: Alphabetical List of Respondents
to the Core Strategy Submission (Publication)
Consultation**

Alphabetical List of Respondents to the Core Strategy Submission (Publication) Consultation

- Alan Atkinson and Andrew Sykes Agent DTZ
- Andy D'Agorne - York Green Party
- Ann Stafford
- Associated British Foods Agent – Rapley
- AW & CB Dodd
- B & S Osborne
- Banks Group
- Barratts, Persimmon, Miller, Shepherd, Taylor Wimpey & Helmsley Group Agent - Turley Associates
- Barry Otley
- Blacklion Ltd Agent - Steven Longstaff - England & Lyle Ltd
- BR Ellis
- British Waterways
- C Summers & C Kennedy
- Campaign to Protect Rural England
- Carr Junior School Safe Skate Committee Gillian Darton
- Chris Jilbert
- City of York Labour Party
- Claxton Construction Ltd Paul Cordock
- Cllr C Runciman CYC Liberal Democrat Group
- Cllr Joseph Watt
- Cllr Warters
- Coal Authority Planning & Local Authority Liaison Department
- Commercial Estates Group Agent - DLP Planning Ltd
- Consortium of Landowners of land south of Moor Lane Agent - Jan Molyneux Planning
- Constructive Individuals Phil Bixby
- Copmanthorpe Parish Council
- Copmanthorpe Wind Farm Group
- Cyclists Touring Club North Yorkshire Mr Twigg
- D Lancaster & Burneston Family Agent - Carter Jonas
- Dart Energy (Europe) Ltd Agent - CB Richard Ellis
- David Neal
- DK Lancaster
- Doreen Marsh
- DPP agent for Tesco Stores Ltd
- DPP LLP agent for various landowners
- East Riding of Yorkshire Council
- Edward Courtney
- English Heritage
- Environment Agency
- Friends, Families & Travellers
- Fulford Parish Council
- G W Proctor

- GARLAND Peter H Goodchild
- Guy Wallbanks
- Hallam Land Management Agent - DLP Planning
- Hambleton District Council
- Harworth Estates Agents - BNP Paribas Real Estate
- Haxby Town Council
- Heworth Without Parish Council
- Highways Agency
- Hogg Builders (York) Ltd Agent - Nathaniel Lichfield & Partners
- Holtby Parish Council
- Home Builders Federation
- Huntington Parish Council
- J A Wood
- J Nicholson
- Janet Hopton
- Janet O'Neill (personal rep)
- Jason Rose
- JD & MJ Barstow - see above
- Jennifer Hubbard
- John Almond
- Joyce Pickard
- Julian Sturdy MP
- K Richardson
- Land & Development Practice
- Laverack Associates Architects Mr M Laverack
- Lydia Stafford
- M S Wood
- M Vassie
- Mary Rowntree
- Matbo Ltd - Agent Barton Wilmore
- Meadlands Residents Association Thomas Hughes
- Miller Homes Agent - Planning Prospects Ltd
- Mineral Products Association
- Mitchells & Butlers (Property) Ltd Agent - JWPC Ltd
- Monks Cross Shopping Park Trust Agent - Indigo Planning Ltd
- Monks Cross North Consortium Agent - Dacres Commercial
- Mr & Mrs J & M Teasdale
- Mr & Mrs WP Legg
- Mr D Skilbeck
- Mr David Green
- Mr Keith Nicholson
- Mr S Briggs
- Mr T Cottrell Agent - Planning Prospects Ltd
- Mrs Linda Hatton
- Mrs M Nicholson
- Mrs Sue Wherrett
- Mrs Valerie B Swaby

- Ms BJ Hilton
- Ms Monica Nelson
- Murton Parish Council
- National Federation of Gypsy Liaison Groups Agent -Derbyshire Gypsy Liaison Group
- National Grid Agent – Amec
- Natural England
- Nether Poppleton Parish Council
- New Earswick Parish Council
- North Yorkshire County Council
- Northminster Ltd Including DK Lancaster, JD & MJ Barstow
- Osbaldwick Parish Council, Meadlands Area Residents Association Cllr Mark Warters
- P and S Suffield?
- Persimmon Homes, Barratt and David Wilson Homes (Yorkshire) Agent -Barton Wilmore
- Pilcher Properties Ltd Agent – Dacres
- Redrow Homes Agent - DLP Planning Ltd
- Roger Bastin
- Ronald Healey
- Rufforth With Knapton Parish Council
- Ryedale District Council
- Selby District Council
- Shepherd Group Properties Agent - Turley Associates
- Skelton Parish Council
- Sport England
- Strensall with Towthorpe Parish Council
- Tangent Properties
- Taylor Wimpey (UK) Ltd Agent – Spawforths
- Taylor Wimpey Agent - DLP Planning
- Taylor Wimpey Uk Ltd Agent - Nathaniel Lichfield & Partners
- The Theatre Trust
- Thomas Barnes
- Tony Bennett
- University of York Agent - O'Neill Associate
- Upper Poppleton Parish Council
- W & CB Pawelee
- Wheldrake Parish Council
- Wiberforce Trust Agent - Lambert Smith Hampton
- Wigginton Parish Council
- William Birch & Sons and others Agent - Directions Planning Consultancy
- Without Walls Partnership - Sir Ron Cooke
- York & North Yorkshire Chamber of Commerce
- York Civic Trust
- York Designer Outlet Agent - NTR Planning Ltd
- York Diocesan Board of Finance - Agent Smiths Gore
- York Environment Forum
- York Green Party Denise Craghill
- York Green Party Owen Clayton
- York Professionals

- York Racecourse
- York Youth Council
- Yorkshire Water
- Yorkshire Wildlife Trust
- Yorwaste Ltd

Appendix J: Specific Consultees Letter



City Strategy

9 St Leonard's Place
York
YO1 7ET

Tel: 01904 551550

Telephone: 01904 551464

21 September 2011

Dear Sir/Madam

**Local Development Framework Core Strategy Submission (Publication)
Consultation**

I am writing to inform you about the opportunity to comment on York's Core Strategy.

The Core Strategy sets out a 20 year planning vision for York, covering the following themes:

- York's special historic and built environment;
- building confident, creative and inclusive communities;
- a prosperous and thriving economy;
- a leading environmentally friendly city; and
- a world class centre for education and learning for all.

The document sets out how the Council will protect and enhance the city's special historic character and natural environment, ensuring that any new developments meet the city's long terms needs.

The Core Strategy has been prepared over a number of stages. Previous consultation has taken place on Issues and Options and Preferred Options which you may have been involved with in 2006, 2007 and 2009. The views raised, along with the results of emerging evidence base work, were used to develop a Submission (Publication) document on which the council would now like your views. This document will then be submitted for examination by an independent inspector. Representations received during this consultation will be forwarded to the Inspector to be considered as part of the examination which will take place early next year.

The consultation period for the Core Strategy starts on **Monday 26 September** and all responses must be received by **5pm on Monday 7 November 2011**. Representations should be made on the representations form and received by the council within the consultation period.

Please find enclosed a CD which includes a copy of all the consultation documents, including the Core Strategy document on which we are seeking your views, a representations form on which to submit your comments and the Statement of

Director: Bill Woolley

www.york.gov.uk

Representations Procedure which provides further details on the consultation and how representations can be made.

Alternatively all the consultation documents are available on the Council's website at www.york.gov.uk/LDF/corestrategy or by contacting the Integrated Strategy Unit by email at intergratedstrategy@york.gov.uk or by calling 01904 551464.

If you require any further information on the consultation please contact the Integrated Strategy Unit on the details set out above.

Yours faithfully



Martin Grainger
Head of Integrated Strategy

Enc: CD which includes the following core documents:

- CD1 - Core Strategy Submission (Publication) (September 2011)
- CD2 - Core Strategy leaflet (September 2011)
- CD3 - Sustainability Appraisal and Technical Appendices (September 2011)
- CD4 - Sustainability Appraisal Non-Technical Summary (September 2011)
- CD5 - Habitats Regulation Assessment/Appropriate Assessment (September 2011)
- CD6 - Heritage Paper and Appraisal (September 2011)
- CD7 – Topic Paper on the Transport Implications of the LDF (September 2011)
- CD8 - Consultation Statement (Regulation 30 (d)) (September 2011)
- CD9 - Infrastructure Delivery Plan (September 2011)
- CD10 - Equalities Impact Assessment (September 2011)
- CD11 - Statement of Representations Procedure
- CD12 - Representation form
- CD13 – Supporting Paper 1: Housing Growth (September 2011)
- CD14 – Supporting Paper 2: Employment Growth (September 2011)
- CD15 – Supporting Paper 3: Retail (September 2011)
- CD16 – Supporting Paper 4: Spatial Strategy (September 2011)

Appendix K: General Consultees Letter



City Strategy

9 St Leonard's Place
York
YO1 7ET

Tel: 01904 551550

Telephone: 01904 551464

21 September 2011

Dear Sir/Madam

**Local Development Framework Core Strategy Submission (Publication)
Consultation**

I am writing to inform you about the opportunity to comment on York's Core Strategy.

The Core Strategy sets out a 20 year planning vision for York, covering the following themes:

- York's special historic and built environment;
- building confident, creative and inclusive communities;
- a prosperous and thriving economy;
- a leading environmentally friendly city; and
- a world class centre for education and learning for all.

The document sets out how the Council will protect and enhance the city's special historic character and natural environment, ensuring that any new developments meet the city's long terms needs.

The Core Strategy has been prepared over a number of stages. Previous consultation has taken place on Issues and Options and Preferred Options which you may have been involved with in 2006, 2007 and 2009. The views raised, along with the results of emerging evidence base work, were used to develop a Submission (Publication) document on which the council would now like your views. This document will then be submitted for examination by an independent inspector. Representations received during this consultation will be forwarded to the Inspector to be considered as part of the examination which will take place early next year.

The consultation period for the Core Strategy starts on **Monday 26 September** and all responses must be received by **5pm on Monday 7 November 2011**. Representations should be made on the representations form and received by the council within the consultation period.

Please find enclosed a leaflet and the Statement of Representations Procedure which provide further details on the consultation and how representations can be made.

Director: Bill Woolley

www.york.gov.uk

The Core Strategy Submission (Publication) document on which the council is seeking your comments is available to view in all City of York libraries and the Council receptions at 9 St Leonard's Place, the Guildhall and Library Square. A number of other documents have also been published to support the consultation on the Core Strategy. A list of these is provided for information at the end of this letter. All the consultation documents are available on the Council's website at www.york.gov.uk/LDF/corestrategy or by contacting the Integrated Strategy Unit by email at intergratedstrategy@york.gov.uk or by calling 01904 551464.

If you require any further information on the consultation please contact the Integrated Strategy Unit on the details set out above.

Yours faithfully



Martin Grainger
Head of Integrated Strategy

Enc: leaflet and Statement of Representations Procedure

Core documents:

- CD1 - Core Strategy Submission (Publication) (September 2011)
- CD2 - Core Strategy leaflet (September 2011)
- CD3 - Sustainability Appraisal and Technical Appendices (September 2011)
- CD4 - Sustainability Appraisal Non-Technical Summary (September 2011)
- CD5 - Habitats Regulation Assessment/Appropriate Assessment (September 2011)
- CD6 - Heritage Paper and Appraisal (September 2011)
- CD7 – Topic Paper on the Transport Implications of the LDF (September 2011)
- CD8 - Consultation Statement (Regulation 30 (d)) (September 2011)
- CD9 - Infrastructure Delivery Plan (September 2011)
- CD10 - Equalities Impact Assessment (September 2011)
- CD11 - Statement of Representations Procedure
- CD12 - Representation form
- CD13 – Supporting Paper 1: Housing Growth (September 2011)
- CD14 – Supporting Paper 2: Employment Growth (September 2011)
- CD15 – Supporting Paper 3: Retail (September 2011)
- CD16 – Supporting Paper 4: Spatial Strategy (September 2011)

Appendix L: Letter of Acknowledgement to Respondents



City Strategy

9 St Leonard's Place
York

YO1 7ET

Tel: 01904 551550

5th December 2011

Dear Sir / Madam

**City of York Local Development Framework Core Strategy Submission
(Publication) Consultation**

Thank you for submitting representations to the document above that we consulted on from 26th September until 7th November 2011. I am pleased to inform you that your representations are considered to be duly made in line with Planning Regulations.

Please see the enclosed sheet which sets out the unique reference numbers allocated to your representations and a very brief summary of your comments.

The next stage of the LDF Core Strategy process is Submission to the Secretary of State, in early 2012. We then anticipate the Examination in Public to take place in spring 2012, followed by adoption in summer 2012.

I trust that the enclosed summary is an accurate interpretation of your comments. However if you would like any amendments to be made we would appreciate any changes by Friday 23rd December 2011. Please contact us on:

01904 551464

integratedstrategy@york.gov.uk

Integrated Strategy Unit
9, St Leonard's Place
York
YO1 7ET

Thank you,
Kind Regards,

A handwritten signature in black ink that reads 'M.P. Grainger'.

Martin Grainger
Head of Integrated Strategy