

Summary of Petitions

This document summarises the petitions received as part of the Local Plan Further Sites Consultation. The references after each petition indicate which site/sections the petitions have been registered and summarised against.

Petition 1. Petition collected by Strensall Ward Liberal Democrats against the allocation of Site 810 (Land to the East of Strensall Rd Earswick) in the draft Local Plan – submitted by Cllr Runciman.

111 signatures

We wish to object in the strongest possible terms to the plan by City of York to allocate land to the east of Strensall Rd, Earswick (SITE 810), for housing development. We ask that the allocation of the site as safeguarded land be deleted from the Local Plan.

(Objection, Section 5, Site 810)

Petition 2, Earswick Petition – submitted by Cllr Doughty.

536 signatures

We the undersigned petition City of York Council to oppose Labour's plans to build houses on the Strensall Road site.

(Objection, Section 5, Site 810)

Petition 3, Cllr Reid.

155 signatures

Against developing the Green Belt area of York (ST10 Moor Lane).

(Objection, Non FSC, Site ST10)

Petition 4, Cllr Ayre

517 signatures

Opposed to the proposed use of Greenbelt land in the Heworth Without area (Land East of Metcalfe Lane – ST7 and North of Stockton Lane – Site 187).

(Objection, Section 2, Site 187 and Objection, Section 4, ST7)

Petition 5, Elvington Petition – Elvington Action Group

345 signatures

I object to the following proposed developments contained in CYC's additional sites proposals.

Petitioners were given the option to tick which of the following sites they objected to:

- Site 747 – **341 signatures**

(Objection, Section 8, Site 747)

- Site 22 – **322 signatures**

(Objection, Section 8, Site 22)

- Site 802 – **331 signatures**

(Objection, Section 5, Site 802)

- Site 97 – **317 signatures** (including 3 objecting to part)

(Objection, Section 2, Site 97)

- Site 815 – **322 signatures**

(Objection, Section 5, Site 815)

E-Petitions

There is a further e-petition running through democracy.york.gov.uk as follows:

Save Earswick Green Belt – closes 26th December 2014

Currently at 243 signatures

We the undersigned petition the council to oppose Labour's plans to build houses on the Strensall Road site.

Labour run York Council have published plans to remove 88 hectares of land east of Strensall Road and adjacent to Willow Grove from the Green Belt. Council reports reveal that the site may be 'excluded from the green belt' and 'considered for development'. Based on similar sized sites across York this could mean around 2000 houses are eventually built there.

Submitted by Cllr Runciman

Petition 1
111 signatures.

PETITION COLLECTED BY STRENSALL WARD
LIBERAL DEMOCRATS AGAINST THE ALLOCATION OF
SITE 810 (LAND TO THE EAST OF STRENSALL RD
EARSWICK) IN THE DRAFT LOCAL PLAN

Objection
Section 5
Site 810.

We wish to object in the strongest possible terms to the plan by City of York to allocate land to the east of Strensall Rd, Earswick (SITE 810), for housing development. We ask that the allocation of the site as safeguarded land be deleted from the Local Plan.

**We the undersigned petition City of York Council to
oppose Labour's plans to build houses on the
Strensall Road site: -**

Name	Address	Signature
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**We the undersigned petition City of York Council to
oppose Labour's plans to build houses on the
Strensall Road site: -**

Name	Address	Signature
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- logged as separate response from [REDACTED] - ID11405
or as petition 3.



1st July 2014.

Reference :- York Local Plan, referred to as ST10 Moor Lane.

Dear Sir/Madam,

With reference to the above. I have attached, 3 letters that refers to the York Plan which identifies reasons for not building on the green belt area, these issues are still current, & very pertinent to residents.

The site at Acomb Bog is greatly valued by a large number of the York population and Visitors to the area.

I would like you to take these addition points into consideration which are of particular concern to many residents.

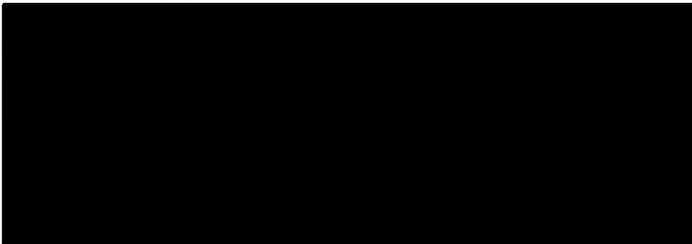
1. Permanent loss of green belt area resulting in the reduction of productive farm land.
2. The permanent irreversible loss of wild life habitat, deer, fox, geese, pheasants & insects, to name some species seen in Moor Lane fields, The copy of the Yorkshire wildlife trusts letter gives insight on the impact to Acomb Bog, & surrounding water tables.
3. There are numerous other sites which are suitable for development & would less affect wild life around York.
4. The area has sufficient facilities to serve the residents, further housing would require increase in surrounding infrastructure. Facilities such as shops, schools, roads, etc. would be required.

5. *Many residents bought in this area for the view, location giving near access to country-side, disruption to the location would in turn devalue current homes in the area.*

6. *Attached is a small portion of the residents' that are against using the the Green Belt area of York.*

We would appreciate our views to be carefully taken into consideration, & residents to be consulted prior to future planning of Moor Lane area.

Yours faithfully,



Attachments :-

1. *Yorkshire Wildlife Trust.*
2. *Application for development of land off moor lane.*
3. *Dringhouses and Woodthorpe Ward Councillors.*
4. *Some local residents against developing the Green Belt Area.* → NB: dealt with as separate petition. - see Petitions note.



Yorkshire Wildlife Trust

1 St. George's Place,
York, YO24 1GN
T 01904 659570
E info@ywt.org.uk
@YorksWildlife

Yorkshire Wildlife Trust is registered
in England No. 409650 and is a
registered charity No. 210807.
VAT No. 170 3914 75

Dear Resident

Threat to York's Wildlife - We need your help

Yorkshire Wildlife Trust works across Yorkshire managing 95 nature reserves and has a membership of over 36,000. YWT is the second oldest of the 47 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust's principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

We are writing to you because we are extremely concerned about a development proposal near your home. York City Council is currently consulting on its Further Sites Consultation of the City of York Local Plan and one of the sites within it, referred to as ST10 Moor Lane – a very large housing development, lies immediately adjacent to our oldest nature reserve at Askham Bog.

We believe that the wildlife interest of this vitally important York site will be irreversibly damaged by the development proposals. We objected to the allocation of this sites in the first Local Plan consultation but it remains in the Plan and we are now asking for your help! As YWT's first ever nature reserve, Askham Bog has special significance. In fact in 1946 the Trust was created with the purpose of looking after the site which was bought to save it from development.

A brief summary of the issues is as follows:

- Askham Bog Site of Special Scientific Interest supports an exceptionally high biodiversity with healthy populations of numerous nationally rare species, and the only regional populations of many others. Particular rarities include gingerbread sedge *Carex elongata* (largest population in England), numerous water beetles and the fen square-spot moth *Diarsia florida*. Askham Bog has been recognised as an exceptional habitat for two centuries.
- It is highly valued both by the population of York and by a national and international community of naturalists and ecologists. Just 2 miles from the city centre it offers a peaceful place to walk and enjoy nature.
- The importance of the site is entirely dependent on the integrity of the local water table and it is exceptionally sensitive to any disturbance of that. We are concerned that the housing proposals will irreversibly damage the hydrology of Askham Bog and its special interest will be lost. There has been no information presented to indicate that this will not be the case.
- We are also concerned about the huge increase in recreational access on to the reserve. There is highly likely to be unmanaged access from a range of locations, particularly from dog walkers and young people. Whilst we welcome large numbers of people on to many of our sites, Askham Bog is too small and fragile to cope with this high volume of unregulated access.
- We therefore consider that it should not be allocated for development and that doing so would be contrary to the Council's own policies regarding protecting biodiversity and Sites of Special Scientific Interest.

We would be extremely grateful if you would express these concerns together with any of your own to York City Council who will be making decisions regarding this and other sites. The final deadline for comments is **16th July 2014**.

You can respond to the consultation using a response form which is available from the City of York Council website, the Council reception at West Offices or in any of the libraries or you can contact the Forward Planning team at:

FREEPOST RTEG-TYYU-KLTZ
City of York Council
West Offices
Station Rise
York
YO1 6GA

Tel: 01904 552255 Email: localplan@york.gov.uk

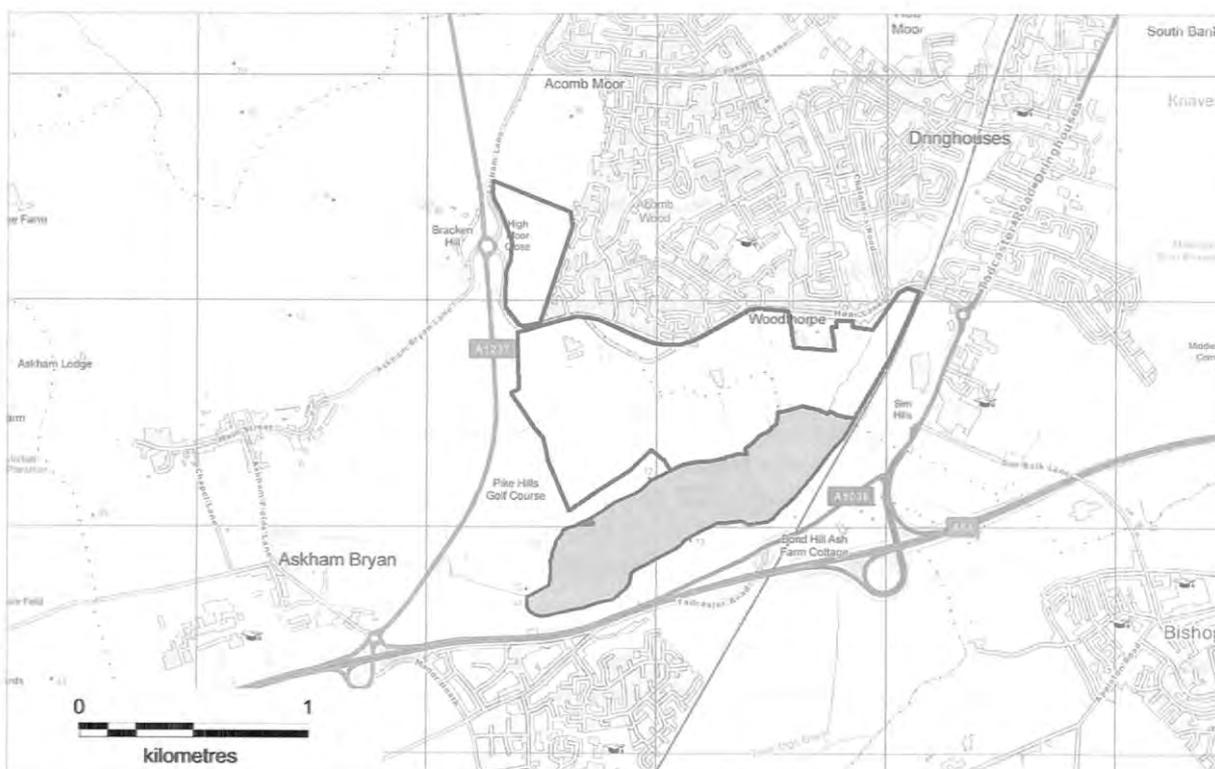
Further information including links to the York City Council website is available Yorkshire Wildlife Trust's website www.ywt.org.uk/York

Thank you very much for your support.

Yours sincerely



Rob Stoneman
Chief Executive



A map of the proposed housing allocation – red outline, with Askham Bog SSSI Nature Reserve in green.

City of York



CITY PLANNING & ESTATES OFFICER

ERIC PEARSON
Dip.T.P., F.R.T.P.I., A.M.B.I.M.
5 St Leonard's Place
YORK YO1 2EX
Telephone (0904) 59881

Ext 345 (Miss Hargreaves)

Date 5th August, 1981.

Our Ref 7/00/3972
7/00/3973
7/00/3974
7/00/3974A
7/00/3975/JMH

Your Ref

Dear Sir/Madam,

Applications for development of land
off Moor Lane

You were one of many individuals who wrote to me some time ago opposing one or more of the five applications for planning permission which had been submitted on behalf of Messrs. R. W. & M. E. Lycett-Green. You will appreciate that these applications have involved a good deal of consultation with a wide ranging group of organisations and therefore it was only at a recent meeting of the Development Control Sub-Committee of the City Council that I was able to present a comprehensive report on these various proposals.

The Sub-Committee (acting as Local Planning Authority) has now made the following decisions:-

/7/00/3972: Use of land ...

Cont'd.

Mr. & Mrs. J. & C. Neale,
132, Moor Lane,
York.

Dringhouses and Woodthorpe Ward Councillors



Cllr Ann Reid, 62 Grassholme York YO24 2ST
01904 701727 cllr.areid@york.gov.uk

5th June 2009.

Dear [REDACTED]

Thank you for returning the "grumblesheet" from our recent Focus newsletter expressing your concerns about the development of the land South of Moor Lane.

This proposal came about as part of the Council's work to develop a planning document called the Local Development Framework which will set out how the City will develop up until 2030. That plan has to take into account guidance and requirements from central Government and it is the Government's desire to increase housing provision that has meant that the Council has needed to look beyond already allocated and brownfield sites in order to identify enough land to satisfy the Government's requirements for the next 20 years.

Your Lib Dem Councillors disagree with the number of new homes that we are expected to provide but unless we allocate sufficient land then our Plan could be deemed "unsound" and the final decisions made by Government appointed Inspectors. We are therefore treading a fine line between meeting Government targets and residents wishes.

The Council will soon be consulting on a number of "preferred options" and this will not recommend building on the land South of Moor Lane but it will recommend looking at greenfield sites on the North and West of the City. It will also ask for residents views on a range of issues including the number of houses we should be providing during the plan period, how much employment growth there should be, what leisure facilities and open space should be provided and much more. The consultation document to be an insert in the next "Your City" newsletter will also include links to the Council website if you want to find out more. There will also be a number of consultation events for different interest groups. I would urge you to take part in the consultation as it is an important issue for the future of the City and the more people who give their views the better.

You will appreciate that this is a complicated process so I hope that you can follow my potted explanation. Please do not hesitate to contact me if you would like any more information. Thank you for your support on this issue. Your comments have been logged and gives us the confidence to represent your views

Yours sincerely

A handwritten signature in black ink, appearing to read "Ann Reid".

Ann Reid

IO 7313

Abbott, Jessica

From: Cllr. N. Ayre
Sent: 16 July 2014 18:41
To: localplan@york.gov.uk
Subject: Additional sites

Please find attached comments on local plan additional sites in Heworth Without.

Nigel

Sent from my iPhone

Submission in regards of additional sites included in the Local Plan located within Heworth Without Ward by Cllr Nigel Ayre

This is a formal objection to the inclusion and amendments to the land East of Metcalfe Lane, (Site ST7) contained in the draft York Local Plan preferred options paper and the inclusion of Site 187 North of Stockton Lane.

This objection can be read in conjunction with my initial submission regarding the Local Plan allocations which is included at Annex 3 (and remains relevant both for the original sites and further consultations) and also the wider Liberal Democrat submission analysing the flaws in the proposed plan.

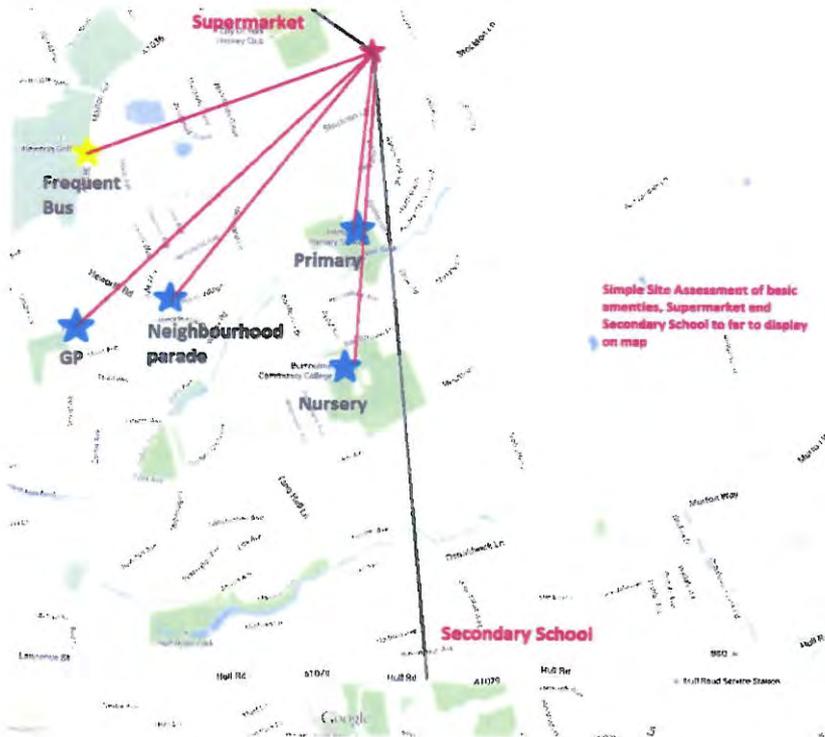
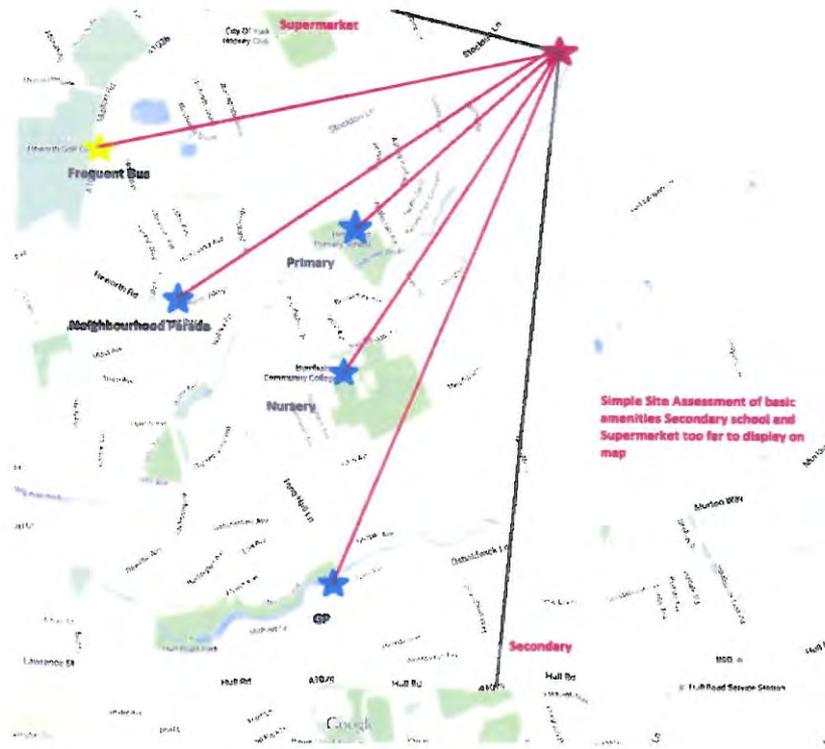
This presents only a very brief appraisal. Yet again City of York Council's failure to supply documents at the correct time and failure to supply some documents at all have ensured the six week consultation period is an inadequate time frame to assess and comment in detail on the plan. I will continue to make this point prior to and during the public examination.

1. Criteria 4 Assessments

The methodology used by the council to assess the sites based on Criteria 4 is ultimately flawed. The decision to use multiple locations across the various sites for proximity assessments provides a false positive. The correct approach would be to either use a fixed point, most sensibly the centre of the site, or to analyse what percentage of the site falls within the required distances as other local authorities have done. Applying the criteria correctly it is clear that site ST7 scores 2 rather than the minimum 22, and site 187 a little better with a score of 13. Neither meets the minimum requirement to be considered.

Beyond this a series of false assumptions and out of date information is included. The sites are assumed to be in proximity of a GP surgery that has now closed and a secondary school which has also closed.

Even applying the faulty methodology the council has also included Site 187 despite the fact its own evidence shows that it failed criteria 4 assessment. The site scored only 12 not the minimum 13 for residential amenities, (score 4 for primary school, score 4 for GP surgery, score 4 for open space). Even without the factual error that this site only actually scores 5 rather than twelve the site has failed basic assessment and should be rejected.



I include an accurate summary of proximities and also those incorrect ones that have been used as part of the council's appraisal.

East of Metcalfe Lane

Criteria	Score	actual edge	actual centre						
Doctors	2		0	East Parade 1.4 miles	400m no barrier = 5	400m partly nb = 4	800m no barrier = 3	800m partly nb = 2	no doctors 0
Nursery	4		0	Burnholme 1.8 miles	400m = 5	400-800m = 4	800m = 2	400m barriers = 1	over 800m = 0
Primary School	4		0	Hempland 1.1 miles	400m = 5	400-800m = 4	800m = 3	400m barriers = 1	over 800m = 0
Secondary School	4		0	AHS 1.7 miles	400m = 5	400-800m = 4	800m = 2	400m barriers = 1	over 800m = 0
Higher Education	3		0	AHS 1.7 miles	400m = 5	400-800m = 4	800m = 3	400m barriers = 2	over 800m = 0
Neighbourhood Parade	4		0	Spar? 0.8 miles	400m = 5	400-800m = 4	800m = 2	400m barriers = 1	over 800m = 0
Supermarket	5		0	Morrison 1.8 miles	400m = 5	800m = 3	over 800m = 0		
Openspace	5		2		5-8 openspaces = 5	2-4 openspaces = 4	1 openspace = 2	0 openspaces = 0	
City Parks	1								
Local Parks									
Natural Semi Natural	1								
Amenity	1								
Childrens playspace	1								
Young persons									
Outdoor Sport	1								
Allotments	1								
Number of Open Spaces	6								
MINIMUM RESIDENTIAL SCORE 18	32	0	2						
Non Frequent bus	3		0	no 13 RB Lane 0.7m	400m = 3	800m = 2	over 800m = 0		
Frequent bus	3		0	Malton Road 1.8m	400m = 5	800m = 3	over 800m = 0		
Park and Ride	0		0	Malton Road 1.8m	400m no barriers = 5	partly 400m nb = 4	800m no barriers = 2	partly 800m nb = 2	over 800m = 0
Railway Walk	0		0	3.1miles 60 mins	5 mins = 5	10 mins = 3	15 mins = 1	over 15 mins = 0	
Railway Cycle	0		0	3.1m miles 20 mins	5 mins = 5	10 mins = 3	15 mins = 1	over 15 mins = 0	
Adopted Highway	5		0		yes = 5	no = 0			
Access to cycle route	3		0		on or adjacent = 5	50m = 3	530m = 1	over 530m = 0	
MINIMUM TRANSPORT SCORE 9	14	0	0						
TOTAL SCORE	45	0	2						
MINIMUM TOTAL SCORE 22									

North of Stockton Lane

Criteria	Score	actual edge	actual centre						
Doctors	4		0	East Parade 1mile	400m no barrier = 5	400m partly nb = 4	800m no barrier = 3	800m partly nb = 2	no doctors 0
Nursery	0		0	Burnholme	400m = 5	400-800m = 4	800m = 2	400m barriers = 1	over 800m = 0
Primary School	4		1	Hempland 0.4 miles	400m = 5	400-800m = 4	800m = 3	400m barriers = 1	over 800m = 0
Secondary School	0		0	AHS 2.1 miles	400m = 5	400-800m = 4	800m = 2	400m barriers = 1	over 800m = 0
Higher Education	0		0	AHS 2.1 miles	400m = 5	400-800m = 4	800m = 3	400m barriers = 2	over 800m = 0
Neighbourhood Parade	0		0		400m = 5	400-800m = 4	800m = 2	400m barriers = 1	over 800m = 0
Supermarket	0		0	Morrison 1.8 miles	400m = 5	800m = 3	over 800m = 0		
Openspace	4		4		5-8 openspaces = 5	2-4 openspaces = 4	1 openspace = 2	0 openspaces = 0	
City Parks	0								
Local Parks	0								
Natural Semi Natural	1								
Amenity	0								
Childrens playspace	0								
Young persons	0								
Outdoor Sport	1								
Allotments	0								
Number of Open Spaces	2								
MINIMUM RESIDENTIAL SCORE 18	12	0	5						
Non Frequent bus	3		3		400m = 3	800m = 2	over 800m = 0		
Frequent bus 15 mins	3		0		400m = 5	800m = 3	over 800m = 0		
Park and Ride	0		0	Malton Road 1m	400m no barriers = 5	partly 400m nb = 4	800m no barriers = 2	partly 800m nb = 2	over 800m = 0
Railway Walk	0		0	2.3miles 45 mins	5 mins = 5	10 mins = 3	15 mins = 1	over 15 mins = 0	
Railway Cycle	0		0	2.3 miles 16 mins	5 mins = 5	10 mins = 3	15 mins = 1	over 15 mins = 0	
Adopted Highway	5		5		5 yes = 5	no = 0			
Access to cycle route	1		0		1 on or adjacent = 5	50m = 3	530m = 1	over 530m = 0	
MINIMUM TRANSPORT SCORE 9	12	0	8						
TOTAL SCORE	24	0	13						
MINIMUM TOTAL SCORE 22									

2. Consultation

Almost without exception residents in the ward have been completely unaware of the current proposals and/or the consultation. The vast majority assumed that sites rejected at the initial consultation stage would not be included and were not aware that they had resurfaced.

The council has previously fallen back on the argument that the wealth of responses, fuelled by the actions of local councillors and campaigners is evidence of a successful consultation. This does leave the authority in a Catch 22 situation. If they are to proffer the argument that this is evidence of a robust consultation then they must accept that the information supplied by ward councillors and local campaigners is factually accurate. If this is the case then they are also accepting that their own plans are unsound. If they refute the information that has been supplied locally then ergo any consultation based on this evidence must be flawed.

3. Refusal to supply documentation

Various Freedom of Information requests were lodged in regards these site. None of the documentation asked for has been provided, one request has been refused and the other delayed beyond the length of time for the consultation. Neither ward councillors nor residents have therefore had the opportunity to comment on the proposals from an informed position.

Request number 538378 16th April 2014 – REFUSED, ICO COMPLAINT

Dear City of York Council,

Please Provide the following

1. all documents/analysis in regards the site North of Stockton Lane in regards inclusion in the Local Plan
2. All correspondence between officers and also Cabinet Member in regards inclusion or exclusion of land North of Stockton Lane in the Local Plan

Yours faithfully,

Nigel Ayre

Lane consists of an old nursery and a handful of small detached properties, less than 7, which are characteristic of the transition from urban to semi-rural that occurs as Heworth Without extends into the adjacent farmland and countryside. In fact this is essential to provide a graduated transition from urban to rural rather than building high density to the very edge of farmland.

Unlike the local authority, the submission is to be commended, on measuring its constraints and opportunities, on radius drawn from the centre of the site rather than multiple convenient locations. What is clear from this map however is that nothing of significance sits within a 1km radius of the site, thus failing basic Criteria 4 assessment and leading to the site being rejected.

The submission's own masterplan provides incorrect information that there is a health centre within 800m a post office, pharmacy and grocery store within 1000m and that Monks Cross Park and Ride is within 800m. This despite them submitting a map with 0.5km and 1km radius drawn on and clearly showing the amenities listed as sitting outside the distances claimed. These amenities have been chosen by the author purely for their proximity not on what criteria should be included in an assessment. Therefore this ignores important things such as nursery, secondary school and Further education sites all of which sit well outside the requisite distance.

The submission claims that "the site forms a transition between the current outer urban edge of the city and the wider open countryside beyond and in many ways is typically characteristic of urban fringe land." This ignores the stated role of the land as a green wedge, extending into the city.

While as stated above it does serve a vital transitional purpose it also allows the green wedge to extend through. By nature green wedges will feature some level of built environment with farm houses barns etc. To take the author's argument to a logical conclusion the presence of farm houses on Stockton Lane and the cluster of houses by the A64 flyover would suggest the whole stretch of Stockton Lane was characteristic of urban fringe land and ripe for development.

I therefore cannot agree with the assertion that "the residential properties set around Pasture Lane, visually link with the houses on the (opposite) south side of Stockton Lane can be read as a gateway to the urban edge". The same could be argued of the farm houses further east of the site. The approach to the city from the East follows the green wedge to the North. The green wedge is characterised by sporadic settlements to the North from the A64 flyover to Christ Church. It is essential that this element is preserved. The route in from Malton Road has the extended views that follow the length of Monk Stray, the approach from Stockton Lane is no less important, in fact perhaps more so as unlike Malton Road it represents a direct transition from the rural area around Stockton-on-the-Forest to the city of York, and as such cannot afford any further loss to the extent of the green wedge.

The following photos showing the approach to the site indicate quite clearly that the houses on Pasture Lane are not visible as a “gateway” or any other indicator of urban views. Until the visual break of Christ Church the view is one of development to the South and Green wedge to the North.





In analysing the landscape character it is stated that “the green wedge in this area follows the line of Malton Road.” This is incorrect as Monk Stray forms the Northern Edge of the Green wedge and Stockton Lane the south. The wedge's true line lies in the middle of this, and to suggest that it follows Malton Road serves only to lessen the significance of the land north of Stockton Lane. It is important to note that while it is desirable for green wedges to be accessible to the public this is not their sole or primary purpose. They are indicative of the character of the area and provide visual green routes into the city as well as green corridors for animals and birds.

The map below shows the general boundaries of the identified green wedge as indicated by red lines. The blue line shows a logical midpoint of the wedge, which clearly runs just north of Stockton Lane directly through the proposed site



The analysis also contends that the green wedge “does not take account of the cluster of dwellings set alongside Pasture Lane”. There is no evidence that this is the case. The presence of buildings does not in any way preclude an area being part of the green wedge. As to be expected there are numerous farm houses and outbuildings as well as a caravan site as part of the green wedge. If the presence of the 4 houses on Pasture Lane would prevent the land being designated Green Wedge then the farm houses further east which cover a far greater footprint would similarly render that land of no value.

Finally the photographs attached with the report are aimed to be deliberately misleading. The first, a little worryingly, has not been taken from the highway but instead from within an individual’s property boundary (without their permission?). As a result the screening fence that the homeowners have erected to deliberately block views, does just that. The photo therefore shows very little except what appears to be a suburban garden. It is also appears to have been taken from a height of approximately 4 feet to ensure no wider views of the rural aspect are seen.

The second photo follows a similar methodology. The location chosen ensures the site itself is obscured by a bend and the tree outside the church. Again the photo is taken below eye level to prevent views being seen. A photo taken from eye level 10 yards further forward creates an opposite viewpoint.

The final photo uses the Church notice board to screen the site. In all there are no photos that actually show the nature of the site proposed or allow any analysis of it as suburban or semi-rural.

The following images give a true reflection of the appearance of the area, one in which views of development are limited and that is no way characteristic of a suburban street scene.





As the above view shows, taken opposite the church and in the bus shelter and therefore a key viewpoint in the area, no development at all is currently visible to the North of Stockton Lane, contrary to the claims made by the submission.

Even moving further down Stockton Lane to incorporate one of the two isolated dwellings views of developed land are restricted to a single distant roof top and the predominant feature is the green wedge. Pasture Lane is barely visible other than a single eave.



Facing west the urban edge is clearly defined in the distance and screened away from the green belt. This is also less an urban edge but more a filtering of the Green wedge to a narrower point as it reaches the city-centre consistent with the green fingers extending into the city.



b) Submission ID659 Persimmon

Makes the following statement

"It is therefore clear that: Bad Bargain Lane on its own is only sufficient to provide either a pedestrian/cycle route or a limited number of the 1,800 houses sought in the Local Plan;".

This reiterates the case made both myself and residents that there was insufficient transport access to site ST7. The correct course of action in such a case should be to reject the site rather than to continue to expand to such point as you reach a road large enough to accommodate the expected traffic flows.

The submission makes claims about the suitability of transport access to Stockton Lane. This assessment only covers access from the site to Stockton Lane and access from Stockton Lane to the site. Assuming journeys in the area will not run purely from the site to Stockton Lane a true assessment must be made of the impact of 2500 homes using Stockton Lane. This would require assessment of the key pinch points in the area as traffic from the site would follow a journey pattern that would take them either to the junction of Hopgrove Lane and Malton Road, Straylands Grove and Malton Road or the roundabout at Stockton Lane and Malton Road.

A request for this information has been delayed. The developers have provided no evidence to suggest that these junctions could sustain the traffic proposed. All three

junctions are currently exceeding capacity. No assessment has yet been made as to the impact of the new larger Monks Cross development. This will most likely have increased traffic levels at the two junctions on to Malton Road as well as diverting traffic previously using Malton Road as an access route into the city on to Stockton Lane.

The submission makes the claim that "the site is located to the west and south of existing residential properties fronting Stockton Lane. To the east the site is bound by Old Foss Beck"

The above quote misrepresents the location. The properties to the North of the site are all existing farmhouses as are the ones to the East with the exception of a small group of houses clustered around Cow Moor Bridge. The very suggestion that infilling houses to this boundary is anything other than "unrestricted sprawl" is fanciful. The Brownfield development at the end of Stockton Lane provides a clear boundary to the current (sub)urban edge to the ward. Between this point and Stockton on Forest there are sporadic dwellings, primarily farm houses that are indicative of the semi-rural nature of the area.

The case is then made that, "to prevent neighbouring towns from merging development of the site would not have the effect of Heworth merging with any towns or villages. It would be inconceivable to suggest this development would result in or threaten Heworth merging with Murton or Stockton-in-the-Forest".

The quote betrays a lack of understanding of the area. Heworth itself is an area distinct from Heworth Without, two areas previously separated by local authority boundary. Due to the urban sprawl suggested there will no longer be any discussion between the existing Heworth area, the previously semi-rural (former Ryedale) Heworth Without and the massive new extension. While references to Stockton-in-Forest (sic) and Murton may be inconceivable, the proposal as stands would see a solid block of housing running directly from Stockton Lane to Osbaldwick Lane completely merging two semi-rural communities into one urban mass.

One of the weaker points that is common of contributions across the city is that "the Local Plan proposes development of site ST7: east of Metcalfe Lane, immediately south of the objection site. The objection site performs no different function from the ST7 allocation in respect of this objective."

This argument if upheld opens up large swathes of greenbelt to development. If accepted then it does precisely the opposite of what it claims. A domino effect is created whereby no countryside is protected from encroachment.

There are further apparent errors in the claim that "to preserve the setting and special character of historic towns ... The purpose of the Green Belt in this location has no relevance to the setting and special character of historic towns. Monk Stray lies north of Stockton Lane and the Minster is not visible from the site or Stockton Lane"

This statement is factually incorrect. The minster is visible from Stockton Lane. More so the site itself is identified in the local plan as essential to the setting of the city in allowing views of the Minster from the A64

It is also difficult to support the assertion that "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land Development south of Stockton Lane will not provide a type of development that competes with brownfield sites. Bringing the site into use for residential purposes will benefit York and more specifically Heworth in providing much needed housing to the local area."

Major brownfield development sites in the city are stalled. Within approximately a mile of the proposed site there is a large area of Brownfield land on Heworth Green with existing planning permission for residential use that has made no significant progress and shows no potential. Flooding the area with further greenbelt land is neither necessary nor meets this key test. The suggestion that there is much needed housing in Heworth (sic) over and above the 1800 that has already proposed is to quote the submission itself "inconceivable"

There is insufficient evidence to suggest that this site should be taken out of the greenbelt or that it is a sustainable site with adequate access to amenities and a transport infrastructure to cope.

The submission states as part of its Landscape and Visual Assessment that "Land on the north side of Stockton Lane opposite the proposed allocation area is urban fringe in character."

This statement is wholly incorrect. Next to the site is Sugar Hill Farm, across from the site is Lynden Lea farm and further along are approximately three more farm houses. The extent of eastward expansion is the previously brownfield site, the former garage, that was converted into residential properties. This brownfield site marked the eastern extension of the ward from which point the area is clearly rural as demarked by the 60 mph speed limit. A small cluster of houses do exist on Cowmoor bridge but these are clearly distance from the primary settlement of Heworth Without.

It is equally difficult to defend the claim that "because of the curve in road approaching Heworth from the west it takes users views away from the proposed ST7 allocation and group of houses and there is no distinct urban edge."

This is again incorrect. The site has a clear urban edge viewed after the afore mentioned brownfield site and clearly showing in the following images





As evidence of need, one study is provided which states categorically, “that site ST7 cannot accommodate 1,800 new homes unless two access points are provided from Stockton Lane. We propose the site boundary be extended to Stockton Lane to the north and Old Foss Beck to the east.”

This evidence is entirely refuted by Barrett and David Wilson’s submission which states “There are no fundamental issues and therefore this site could be brought forward in the next five years” and that

The reality of the importance of this land as Greenbelt is unwittingly shown by the author when present their case that “the site is available now and under the control of a major house builder. We are seeking to develop the site at the earliest opportunity.”

This entirely refutes the authors own argument that development of this would not be against NPPF Greenbelt policies to encourage use of brownfield land. There is not the capacity within the city to develop all the proposed Greenbelt land “at the earliest opportunity” while simultaneously delivering brownfield sites. This is a clear admission of a policy to develop greenbelt land first contrary to NPPF. While understandable from a developers point of view it is clear that land such as this serves a vital Greenbelt function in ensuring the progress of stalled brownfield development.

The evidence concludes with the following logical fallacy, “development of the ST7 allocation will be limited to about 350 houses unless the objection site is allocated in order to allow proper vehicular and public transport access. It would be of no benefit to realising the City’s Vision to allocate a large site of 1,800 dwellings and only be able to develop 350 of them.”

This is a weak argument suggesting there is only one solution. In essence the developer is arguing that if the animal is not a duck then it must be a cow. If the answer to the solution is not (x) it does not by default become (y), it could be (a), (b), (c) or any other combination. This clearly ignores the fact that there are multiple solutions to a problem and the fact that they are proposing one of many does not itself provide proof that it is valid.

c) Submission ID673 Taylor Wimpey

Claims are made that the site is “well connected to local services, facilities and public transport links.” This is not the case, as comments on the previous submission reveal that a simple and robust analysis of the site shows it falls well short of the requirements to pass the Criteria 4 assessment.

“Quantum of Development” is something that has been raised by residents and myself and has been lacking from previous analysis and I welcome recognition from the developer here that this is a significant issue - though I take this as a negative not a positive. The submission acknowledges that the existing site represents 8.2% of the total requirement of the plan period. Current proposals would see this figure of 1800 extend to nearer 2500 homes over 10% of the requirement. The reality is that the area and infrastructure simply cannot cope with absorbing this much development. The ward currently represents only around 2% of the city's population and does not have the infrastructure to cope with current numbers. Increases on this scale would have a devastating impact on the area.

The submission states that Stockton Lane “provides good connection to the A64/A1237 outer ring road system for onward access to the wider strategic network”. The reality is that both the Hopgrove Lane South/Malton Road junction and the Hopgrove roundabout are areas of significant problems on the transport network. My request for analysis of these junctions has been delayed. No assessment has been shown as yet of the impact the new Monks Cross 2 is having on these junctions.

The submission states there will be “ease of access for the entire allocation to the strategic road network with minimal impact from the development related traffic passing through existing established residential area.” This process presupposes that all traffic exiting the site will leave in an eastward direction. The reality is a significant proportion, if not the majority, will head westwards to either one of the even more problematic junctions at Straylands Grove/Malton Road and the roundabout at the western end of Stockton Lane. It also ignores the fact that all amenities (which fall outside required distance) are located in a Westerly direction, including primary and secondary schools GP surgeries and parade shops. As such most traffic will be directed through established residential areas.

The submission claims that “existing primary and secondary schools are located within 1km of the site.” The secondary school referred to is closed and the primary

school is oversubscribed, and given it is already twice the national average size has no scope for expansion.

The submission quotes the location of the nearest shopping parades, but fails to mention that both are outside the council's prescribed distances.

The submission describes the visual baseline as "residential development to the west and "open agricultural land to the North, East and South". On this occasion we are in agreement and this statement completely refutes the claims made by Persimmon that the "the site is located to the west and south of existing residential properties fronting Stockton Lane" and that "land on the north side of Stockton Lane opposite the proposed allocation area is urban fringe in character."

The submission claims that "the site is well located to access larger retail areas including Monks Cross." Again this ignores the issues raised above about the volume of traffic and junction capacities.

The submission claims the "site has good access to public transport routes." There is no local bus service passing the site. The area does benefit from a Coastliner service that transports residents from East Yorkshire and the coastal areas of North Yorkshire to York and Leeds. As such it is common for such a service to be oversubscribed, particularly at peak times at which point the service no longer stops in the Heworth Without area. The local service is a significant walk from the site (well over 500m) and does not run evenings or weekends. Both bus services have been the cause of complaints for local residents and the cause of numerous petitions.

Monks Cross Park and Ride is quoted with a capacity of 500. Given the proposal for 2500 homes in this area I would question whether this is capacity enough for the development, let alone the development on top of existing use of the site. This also presupposes that people will head in the opposite direction to their target destination, making a 3 mile trip to Monks Cross at peak time rather than a mile and half journey directly into town. It also assumes that traffic from 2500 homes could get to Monks Cross at peak times through the available junctions.

The map submitted clearly shows that the site is not within the required distance to an off road cycle path.

Education – the submission notes the proximity of Hempland School but not that it does not have the capacity to accommodate the development. It also incorrectly states that there is a secondary school, Burnholme Community College, within 700m of the site.

Healthcare – the submission incorrectly states that there is a GP surgery on Whitby Drive.

To commend the author unlike the local authority, assessment of accessibility is done in a radius from the site centre. This is a more robust measure than the approach taken to cherry pick various different parts of the site that will fit certain criteria. Where the submission falls down though is that it then fails to overlay the local authorities minimum criteria onto these various radiuses, as this would demonstrate the overall failure of the site.

The submission incorrectly asserts "there is a large area of open countryside East of York where little public access is available" The historic Millennium Way Walk, joining the strays of York, passes through Heworth Without and right through the heart of proposed development. As such the only accessible open countryside in the area is the Millennium Way walk which runs along Monk Stray crosses Stockton Lane joining up with Bad Bargain Lane before continuing West. These plans therefore specifically propose developing the only publicly accessible open countryside and amenity space in the vicinity. As such this particular piece of greenbelt land services a vital function.

The submission incorrectly states that the "current edge has not been carefully considered and as a result has an untidy appearance." The existing urban edge is bounded by the former brownfield garage site which was previously the defined urban edge of Stockton Lane, from this point the road becomes 60mph and the landscape is semi-rural with some farm houses. The closure of the garage led to the redevelopment of brownfield land to housing but this still provides a clearly defined boundary edge. I find the suggestion that that the urban edge is "visually scrappy" as disingenuous and also a little insulting to the home owners included in submitted photographs.

I am in agreement with the submission when it states "it is acknowledged that the site frontage has a localised visual amenity role," and this statement clearly refutes the claims made in the Persimmon submission that there is no visual amenity to the site.

The submission continues to refute the early Persimmon submission stating that there are "intermittent views of the Minster and church spire at Holy Trinity Church".

It does however incorrectly state that "views into the site are rare." It is telling that none of the views submitted by the developer are taken from the public right of way on Millennium Way Walk. This provides extensive views in to the site, and as previously stated, the only local opportunity to access open countryside. To only consider views from residential areas is misleading.

The submission claims key green corridors will be retained noticeably a view to the Minster from the A64. In reality the master planning shows that these green corridors are actually part of the road network. It is difficult to see how these can be

anything other than grass verges. I do not believe a road network fulfils the authority's criteria for a strategic green corridor. If genuine green corridors are included it becomes clear that it is not possible to design a road network to link the site.

Again this submission provides evidence for why the developers and land owners might want to develop the site, it does not however demonstrate any compelling evidence for why the site should be removed from the Greenbelt. In fact it is quite perverse that nowhere does the submission mention the NPPF or greenbelt functions contained therein.

d) Submission ID1668 Barratt and David Wilson

This submission is of most interest as it refutes the earlier submissions by Persimmon and Taylor Wimpey. The author states

"There are no fundamental issues and therefore this site could be brought forward in the next five years".

There is no indication that the transport access to the site is inadequate or that there is any need for a major land grab North of the site for the area to become deliverable.

The submission also highlights why the current proposals would, in contradiction to NPPF Greenbelt policy, result in the coalescence of two settlements. It describes the area in the following terms;

"Osbalwick Lane forms the historic spine road connecting the now assimilated village of Osbalwick ... Bad Bargain Lane and Stockton Lane respectively serve to define the southern and northern extents of Heworth (sic)". The specific proposals infill all the area around these two distinct historical settlements creating one amorphous urban sprawl.

This issue is not covered when the submission considers the Greenbelt function of the site. It also incorrectly states that "the site is built up on two of its four sides". In reality the northern and eastern edge are entirely undeveloped. The western edge is developed only in the very corner and similarly the southern edge.

The submission states that the "site does not perform an important role as open countryside." As with all previous submissions it deliberately ignores the presence of the Millennium Way walk and also in this case the public right of way from Cow Moor to Osbalwick (see attached appendix 2). These are the only two opportunities for public access to the countryside. Development of this areas would remove all open countryside access in the area.

The submission states that there is "insufficient capacity from urban regeneration to meet future development growth in York." This statement is open to challenge and

the author offers no evidence to state this. More significantly this is not what the NPPF itself states which is that Greenbelt should be "encouraging the recycling of derelict and urban land."

As mentioned previously, major Brownfield development in York has stalled. As this consultation has shown, major house builders in the area are seeking to develop Greenbelt land only in the first five years of the plan with all submissions stating they will look to be onsite on Greenbelt land at the earliest opportunity. It is clear therefore that the release of any greenbelt and certainly a major increase in the amount, will stall urban regeneration and continue to blight areas of the city. Within 1.5 miles of the site sits the old Gasworks at Heworth Green which seems no further towards development than it was when it closed. Releasing more land in this proximity will further delay progress on sites such as these. These Greenbelt sites serve a vital function in ensuring these brownfield areas are developed first and only when there is evidence of need outstripping the delivery on sites such as these should Greenbelt be considered.

Without going into detail, as it has been covered elsewhere, again tertiary reference is made to the proximity of facilities to suggest the site is sustainable. Again this fails to mention the agreed authority criteria which the site does not meet. It ignores the fact the primary school has no capacity, and that the secondary school and GP surgery claimed do not exist.

The submission states "that the most appropriate means of accessing this site would be by means of projecting the Link Road North West into the development site." This is completely contradictory to previous submissions around the land to the North. Both arguments cannot be true.

I welcome the fact that this is the only submission to truly address the highways implication stating as it does that "the scope of the traffic assessment will be subject to agreement with the city council and will consider the impact of the additional traffic on the current link road and its connection to the Hull Road and the connection of the Hull Road with the A64 York Bypass. On this latter point, discussions with the highways agency will be required."

This echoes the point I have made on previous submissions that impact on the traffic network is critical to the assessment of these sites and none should be considered without these being undertaken. I have asked and been denied the information regarding connections to the North and this submission states that information to the South can be done afterwards. This lack of consideration of infrastructure was an issue highlighted by the Planning Inspection during previous iterations of the LDF and any attempt to submit the site without it would be unsound.

It is clear there is concern about the impact of the volume of traffic on the Hull Road/A64 connection. This is a junction with much less cause for concern than the Hopgrove roundabout which simply would not cope with the projected housing trajectory of any of the proposals so far suggested.

The submission also includes a new complication that has not been raised previously as "traffic patterns in the area are likely to be changed as existing residents and other land users will take the opportunity to divert their traffic from the tang hall corridor eastwards towards the Osbaldwick Link Road." While other submission have presented a halcyon view that 2200 home owners will exit the site smoothly travelling to destinations around the city unnoticed, this raises the further complication that existing traffic from the Tang Hall area will soon discover that this is a prime route for access to Monks Cross and the Northern Ring Road. We therefore have the situation of increased traffic flows on existing residential roads in the area along with increased traffic flow at the proposed new junction on Stockton Lane and even more traffic funnelled to the overcapacity junction at Hopgrove Lane South. It is within reason to expect on a Bank Holiday this junction will now be coping with coast bound traffic from existing properties in Stockton on Forest, the 1800 homes already in Heworth Without, 2500 new homes and approximately 2000 homes in the Tang Hall area.

The submission states quite clearly that the "site represents a 'deliverable site' for future residential development that would provide between 1200 and 1800 new high quality homes." There is no suggestion that the site can support 2300 new homes as the current proposal suggests. In fact elsewhere it is suggested that even the higher end of this scale is beyond what is realistically achievable."

General Comments across submissions.

It is clear from submissions that both sites are not needed. One developer makes a clear case that the site is deliverable without the land to the North. The other that it is deliverable without the land to South. Either way the authority must make a decision on whether it needs either, which there is clearly no evidence for, and if so which. If the authority accepts that it does need one then it is admitting, as was pointed out at the time that the preferred options document that went out for public consultation was not deliverable. As such the process must begin again. If it needs neither then the two sites have to be assessed without consideration of that part of the argument. As such none of the submissions make a strong case for why the land should be taken out of the greenbelt.

e) ID 431 - SHEPHERD HOMES LTD

Submission in regards the local plan states clearly that site ST7 can only deliver 1080 homes not the 1800 suggested in the original preferred options therefore to increase the land grab to 2300 homes is unsound

f) ID 4355 - HENRY BOOT DEVELOPMENTS LTD

The views of Shepherd Homes are backed up by those of Henry Boot who "consider that the assumptions made in Policy H3 about the scale of new housing development that will be delivered by ST7 within the plan period are over-optimistic. The assumed build out rates are simply too high and are unsustainable/undeliverable, even assuming construction will take place by several builders simultaneously. It is recommended that the following revised, yet still aspirational yield assumptions are included in Policy H3 – 1,200 dwellings."

It seems clear that when even developers think that original estimates are between 44% and 33% beyond what is physically achievable any amendments to the site allocation would be a decrease rather an increase in housing numbers.

g) ID1705 Gladman Developments

This study of the approach to the Greenbelt concluded "Incorporating the historic Strays and Ings, these areas are identified on the GBA maps and are more easily recognizable on the ground in terms of their location and their historic and cultural importance. Although only appearing to be relevant in terms of purpose 4 of the Green Belt, these areas are never the less clearly defined and their inclusion justified through an evidence base."

Even in a document that pushes for much higher levels of Greenbelt development this report reinforces the case that areas of Greenbelt proposed for development in Heworth Without are of significance and should be retained as should much of the previous site ST7



Annex 1

Please see separate spreadsheet

Annex 2

Walk 1

Osbaldwick Village.
 Distance: 2 1/2 miles
 Time: 1 hour.
 Giltan: 10
 Gates: 1
 Parking: Osbaldwick Village.
 Public Transport: Bus No. 6/6A

Useful contacts
 City of York Council
 Public Rights of Way Team
www.york.gov.uk
 York Tourist Information
www.yorktourist.com
 York Travel Line
www.yorktravel.com

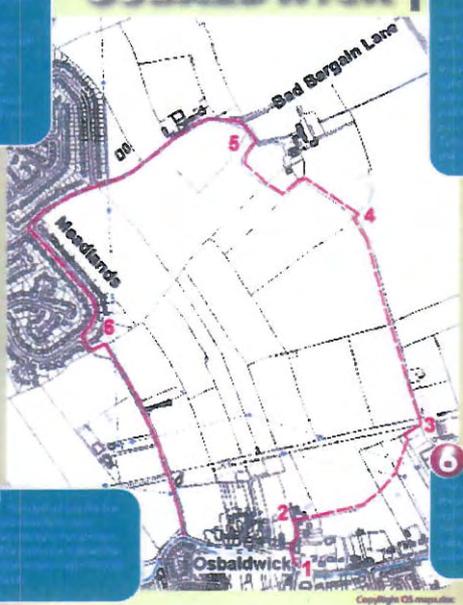
Walks in York
OSBALDWICK




YORK

www.osbaldwick.org.uk
 Friends of St Andrew's Lane
 November 2010

Walks in York
OSBALDWICK



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Annex 3

Submission in regards of sites included in the Local Plan located within Heworth Without Ward

Submission 1

Site ST7 – Housing

Submission 2

Policy AHM3 – travellers site Chowdene Campsite, Malton Road (inc.
Land off New Lane)

Submission 3

Location of Wind Farms

Submission 1

Context

This is a formal objection to the inclusion of land East of Metcalfe Lane, (Site ST7) contained in the draft York Local Plan preferred options paper. This objection can be read in conjunction with the wider Liberal Democrat submission analysing the flaws in the proposed plan.

This presents only a very brief appraisal. The failure to supply documents at the correct time and failure to supply some documents at all have ensured the eight week consultation period is an inadequate time frame to assess and comment in detail on the plan. I will continue to work on this more prior to public examination.

The site in question sits in York's Greenbelt. The Government's revocation of Regional Spatial Strategies specifically excluded policies referring to the Greenbelt and as such despite claims to the contrary the current land is offered full protection as Greenbelt Land. In the original 2011 Local Development Framework the land maintained its Green Belt designation. A subsequent policy seeking aggressive housing expansion in the city included the site as potential development land at the end of the plan policy if sufficient land was still required. The current proposal takes this one stage further and brings the land forward at the beginning of the plan period. It sacrifices a significant part of York's heritage and character at the altar of a failed affordable housing policy.

The policy claims that the aim is to deliver affordable housing for York residents and their children. This is not borne out by the evidence in the plan itself. The Arup report clearly states that while natural population growth will lead to an increase of 10,000 residents by the end of the plan period, the need for these homes will be fuelled by migration of 228,000 from outside the city and 50,000 migration from outside the UK. The policy sacrifices York's greenbelt in the short term, stagnates progress on brownfield sites, to build more houses predicated on overly ambitious migration targets. This may or may not lead to the desired affordable housing targets but this is unlikely. It does have the potential to flood the city with houses without the population growth to occupy. Any subsequent depression of housing prices would be catastrophic for many young families in the city on the brink of negative equity.

If adopted the current plan would see this and other sections of Greenbelt lost for ever in a rush to develop cheap(er) and more higher profit sites while key strategic brownfield sites across the city will see development stalled. The results will blight the city forever.

The plan is based on a flawed methodology that takes ideology as a starting point and then seeks to manipulate the evidence to fit the hypothesis. Evidence clearly shows that the housing numbers included in this plan are neither realistic nor deliverable. The result is a rush to release easily developable greenbelt land. National Planning Policy clearly states that population figures should be drawn from Strategic Housing Market Assessments. Ignoring this fact the plan attempts to use employment projections to fit a desire for higher housing targets. The Plan's evidence base clearly states that basing housing needs on employment growth is at best risky and such approaches have been rejected by the planning inspector as unsound.

The Arup report itself describes the chosen approach as "a significant step change in housing provision and economic growth... housing growth reflects a policy response to pursue economic growth rather than the baseline position on housing need." It would require early release of green belt land on the basis that "it is vital the right sites ... be allocated in the right locations so that

this is delivered." Yet the report states "the environmental impacts of such an approach would need to be carefully considered." This has never happened.

There is no evidence that these ambitious targets are in anyway deliverable. The policy requires a 40% increase on the 10 year average completion rate and 58% increase on the five year average. It seeks annual delivery of houses that has only been achieved twice in recent times, and even then only through the type of high density apartment building that this plan does not seek.

This approach provides the wrong sequential approach, favouring greenbelt before brownfield. The evidence concludes that the only way to come close to achieving this is to sacrifice high value greenbelt land early; "this will need to be supported through providing a supply of viable land, in the right locations, as part of the allocations process."

Pressure has been increased by the failure to include windfall sites, which were included in both 2011 LDF's agreed by Full Council, despite changes to legislation that now allows such inclusion. The Local Plan evidence base, SHLAA shows evidence of historic delivery of 367 windfalls pa.

Great importance is attached to Green Belts in the NPPF. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Five purposes which the Green Belt serves comprise the following:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The current policy to remove this land from the greenbelt is counter to all 5 of these objectives.

Specifics of the Site

1) Highways

The council has failed to submit any evidence that the site is deliverable in terms of traffic infrastructure. It has been stated by officers that **no work has been done** to establish this. The site has no existing transport access. I still await more information at the time of submission but access to this site can only be achieved by new roads connecting on to three streets, Stockton lane, Bad Bargain Lane and Osbaldwick Lane none of which have existing capacity and each have areas that are over capacity. Neither road has any potential for expansion to create more capacity (certainly without further development of the greenbelt). Each option would place significant extra traffic at the following junctions which are all already at capacity, Bad Bargain Lane/Tang Hall Lane, Osbaldwick Lane/Tang Hall Lane, Stockton Lane/Heworth Green roundabout and Malton Road/Hopgrove Lane South. Traffic in this area is already predicted to increase significantly with the new development at Monks Cross and could not cope with extra movements.

2) Design and Conservation

Heworth Without is distinct from Heworth by its semi-rural nature. Where the area regarded as Heworth tends is bound by development on all sides;



the majority of the Heworth Without area, the parished section especially remains characterised by open rural aspects.

The estate of streets including Woodlands Grove etc. and Elm Park Way is bound on both sides by the historic stray and by open farmland that forms one of the green wedges in to the city.





The same is true of the group of streets around Greenfield Park Drive.



The group of streets including Galtres Road, Ashley Park Road and the Beans Way estate are sandwiched by the identified green wedge to the North of Stockton Lane and the currently unidentified Green wedge to the south around Tang Hall beck.



The area around Bramley Garth is bordered North, South and East by open countryside;



This semi-rural aspect represents the very character of the area of Heworth Without and especially the parished area where development is proposed. It was previously part of Ryedale District Council prior to the formation of the unitary authority. As such its character is visibly distinct to that of the urban area.

The proposed plan would subsume this semi-rural suburb into part of the urban extension. It will coalesce boundaries with Osbaldwick resulting in the loss of two distinct and separate areas. This is against the Local plan's own policies.

No assessment has been made of the environmental impact of developing this site. The land currently houses numerous species including wild deer, foxes, pheasants, great crested newts and many species of birds and yet no assessment has been carried out. This is contrary to the evidence within the Local Plan itself and means it is not in conformity with its own evidence base.

The Local Plan's own evidence base includes the view from the A64 to the Minster as one, "which, above all, capture and express the very image and essence of York" (photos attached at annex 1), yet the plan proposes obstructing this view with 1800 homes and a wind farm. The plan is therefore not in conformity with its own evidence base.

The site chosen for the majority of development is listed in the Core Conservation Area Appraisal as one of the city's 26 Key Views; "The only section of the Ring Road that provides an extended view of the Minster". It states;

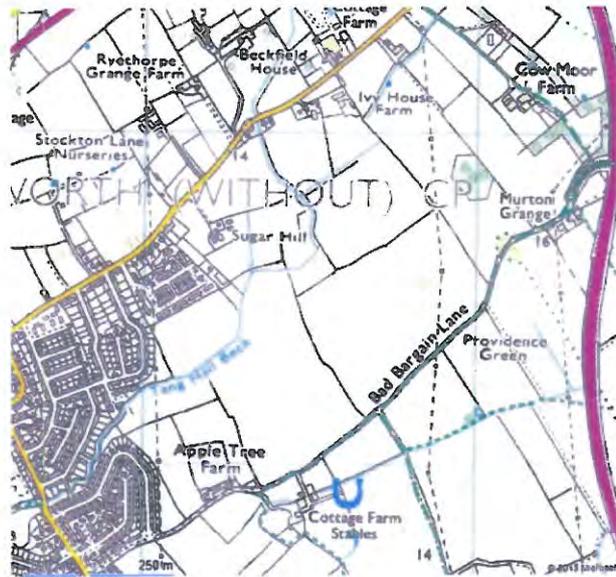
"the cathedral is seen rising above the **flat agricultural land which makes up the immediate context of the city**" It is clear therefore that removing this land from the Greenbelt would cause significant harm to the character setting and context of the city.

This appraisal says development should not be permitted that would challenge the visibility of the Minster. This is exactly what is being proposed here.

You can find the same information in Annex E of the Core Strategy, the Heritage topic states;

"it is essential to protect the views of the Minster Tower from the Ring Road ...further analysis to understand the potential harm to strategic views should be undertaken."

There are numerous public rights of way running through the identified land including the popular "Millennium Way Walk (photos attached at annex 2). These provide informal recreational space for residents in an area of identified deficiency of open space. They are also key to experiencing the setting and character of the city. The Heritage Topic Paper (included at Annex 3), part of the evidence base for the Local Plan, cites Millennium Way as one of the key features of the historic landscape setting and character of the city, a "walkway(s) from centre to countryside." It emphasises the importance of Public Rights of Way; "Many of the district's public rights of way (PROW's) are now used purely for recreational purposes. But historically they had a number of purposes such as drove roads, Roman roads, and tow paths. Today they form important direct access to the countryside and cross-country links between neighbouring settlements."



The Heritage Topic Paper is unequivocal in its description of the value of the land proposed to be developed here;

"York's landscape ... does include a range of features of natural, historical, and cultural significance that contribute to the special qualities of the local landscape. This is also the landscape that serves a substantial population, thus placing great importance on the amenity that it affords. The landscape provides the city and its outlying villages with a rural setting and a direct access to the countryside, and thus has a value/status that reaches beyond the relative quality of the aesthetic landscape.

Its relevance lies in the conglomeration of layers and relics of old landscapes, in part conserved through time by continuous administration, absence of development, and centuries of traditional

management. It is the combination of the various elements such as the Ings and strays that provides York's unique make up. The natural environment is significant in its concentrated collection of a variety of examples of historically managed landscapes, represented for example by wild flower meadows, lowland heath, valley fen, strip fields, veteran orchard trees, species-rich hedgerows. Many of these otherwise isolated remnant landscapes link up with other open spaces resulting for example from our industrial or war time past, to form often accessible tracts of subtly diverse landscapes; thus the landscape/natural heritage is much greater than the sum of its parts. "

The land included clearly forms part of a distinct green wedge that characterises the city yet has not been included in the greenbelt appraisal indicated in green below (the red section shows the defined green wedge) The northern boundary of this section of this wedge is clearly marked by Tang Hall Beck. The Spine of the wedge is the Public Right of Way Millennium Way which runs from the A64 along to the line of Bad Bargain Lane (indicated in blue);



3) Flooding and Drainage

It should be noted the name Bad Bargain Lane, refers to the poor deal received on a piece of land that transpired to be 2/3 swampy pond. Those who learn nothing from history are doomed to repeat it.

Residents do not believe there has been adequate assessment of the effect of drainage. The area suffers frequently from surface water and drainage related issues which are not fully assessed. Gardens are underwater during even short periods of heavy rain. Despite separate surface and foul drainage even short periods of heavy rain result in toilets backing up. This issue has been running for some 20 years and is further ascerbated by each subsequent development. Further work is needed.

4) Air Quality

Increased traffic in the vicinity of the site and elsewhere on the network transforming key arterial routes to permanent traffic jams will have an enormous negative impact on air quality in the area. Further work is needed.

5) SHLAA 2011

The Local Plan's own evidence concludes at Appendix 5 that those sites previously submitted East of Metcalfe Lane are unsuitable for development.

In order to justify inflated housing targets a revised analysis of "Area B" was included as part of the revised LDF in September 2011. This concluded that the site **may** possibly become viable long term if Brownfield sites did not come forward. While residents still maintain this assessment is wrong and even long term the site is not viable, deliverable or suitable it is clear from the evidence that this is not deliverable in the early years of the plan as this submission tries to achieve.

I have included these assessments in Annex 4. It should be noted this is evidence contained within the plan itself not from previous plans. The plan is therefore not in conformity with its own evidence base yet again.

6) Public Opinion

Residents in the area have uniformly opposed the plan. To date 400 residents of the ward have signed a petition opposing the use of this land and the list continues to grow. A council consultation in the ward was attended by over 200 residents. A poll undertaken by the Parish Council at the event showed over 95% of respondents were opposed to the plans.

7) Local amenity

Since the site analysis decisions have been taken to close Burnholme School, merge the two schools in Osbaldwick and close the GP surgery. It is questionable whether capacity exists in the two nearest secondary schools to meet the demand from the closure of Burnholme School and existing demographic trends without beginning to include the additional growth suggested in this plan. The area has a poor local bus service with no service at all on evenings and weekends.

8) Public Consultation

Has been wholly inadequate. On completion of the consultation I will seek to provide a fuller assessment of the consultation process. Issues include

- Lack of information.
- Consultation documents lacking important information.
- Misleading/False statements made by senior councillors during the consultation period.
- Holding consultations at unsuitable venues, and venues that were inaccessible to people in wheelchairs.
- Failure to provide copies of relevant information at local libraries.
- Officers could not provide any information for residents on transport, infrastructure and local amenities.
- Listed evidence base missing key documents.

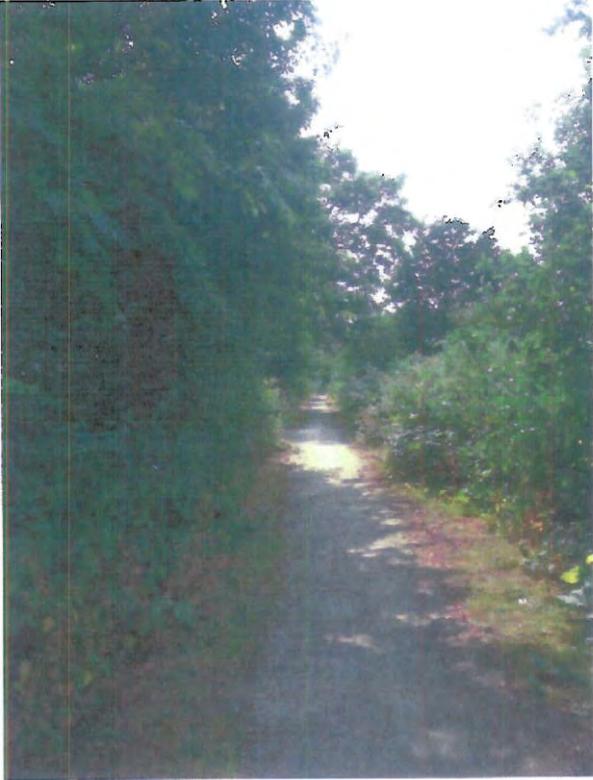
Conclusion

The evidence shows that there is no real housing need for the release of this site. The plan also does not demonstrate that this site is deliverable. There is no evidence that the level of infrastructure required to deliver this site can be achieved. Development of the site would have a catastrophic effect on the setting and character of both the city and the area of Heworth Without. It would amount to nothing more than unrestricted sprawl of large built-up areas, and would lead to neighbouring villages merging into one another. Public consultation has overwhelmingly rejected the inclusion of this site. Releasing this site will stall city centre Brownfield development.

Annex 1 – Key Strategic view of city



Annex 2 – views from Public Rights of Way



Appendix 3 – Heritage Appraisals

Heritage Topic Paper Update (2013)

Landscape and Setting			
Character elements	Key Features	Examples	Significance
Rivers and Ings	<p>Derwent/Ouse: Flooding; Ings meadows; retention of traditional management over centuries - still hay cropped and grazed where possible.</p> <p>Ouse - walking along most of either bank north to Beningborough hall, south past Bishops palace. Activity on river - rowing (3 clubs) dating back to mid 19th century.</p> <p>Foss - two rivers converging in city centre; walkway from centre to countryside beyond ring road; linking villages - the 'hidden' river.</p> <p>Views along river/banks.</p>	<p>Derwent Ings: Fulford Ings (north of the ring road); Naburn marsh (south of ring road); Church and South Ings at Acaster malbis; all SSSI's; Millenium Walk, New Walk, Terrys Walk; avenues of trees.</p>	<p>The Derwent Ings are internationally important. SSSI's of national importance. Their significance lies in the number and extent of SSSI's within the local authority boundary.</p> <p>Setting of city and recreational value.</p>

Landscape and Setting			
Character elements	Key Features	Examples	Significance
Views in and out	<p>Long-distance views of York Minster in low-lying relatively flat vale landscape. The Minster constantly reappears at closer quarters.</p> <p>View of the race course/ Knavesmire and Tenny's combined.</p> <p>Rural edge setting viewed from majority of ring road by way of field margin (northern ring road business parks exception to rule).</p> <p>Views out to the Wolds, Moors and the Howardian Hills (orientation, identity, and sense of location/ setting).</p>	<p>Views from the A64 to Minster from stretch between Hopgrove roundabout to Hull Road</p> <p>View of Minster and city from Askham Bryan roundabout</p> <p>Closer views of Minster from Leeman Road and Water End.</p> <p>View of Tenny's/race course/Knavesmire from A64/Bishophorpe.</p> <p>Views out from Acomb, Kimberlow Hill/Grimston Bar.</p> <p>Views from the Ouse when approaching from the south;</p> <p>Views entering York by Rail from the North, as the line sweeps round by Water End bridge.</p>	<p>This is an important English cathedral landscape that goes to the heart of York's identity and attractiveness.</p> <p>There is a unique combination of elements of historic/ cultural significance important for the setting and identity of York.</p> <p>The proximity of hills/ countryside give a strong sense of place and location. The long distance views are rare - element of surprise and appreciation</p>

5.85 The high concentration of airfields within the York area provides large expanses of openness within an otherwise hedged landscape. Many of the runways are still present. Elvington now has an uncommon grassland habitat and birds because of its extensive open nature on poorer soils. Airfields such as Elvington provide a link in the green infrastructure as it connects Derwent vale to Heslington fllmire and in turn to the golf course on Heslington common and thence to Walmgate stray in very close proximity to the historic core.

5.86 Orchards, both commercial and private, were common place in and around York during the late 19th to mid 20th century. Many of the trees were incorporated into long rear gardens as the city grew in such areas as Holgate, Knaption Lane, and Tang Hall, the significance of which was written into the deeds of the properties. Some of these still stand today as veteran pear and apple trees. There are a few rare instances where the remains of neglected orchards have not been absorbed by later development, such as that which formerly belonged to York City Asylum (later Nabum Hospital). This is now managed as Fullford Community Orchard by the local communities. A new community orchard was created at Danesmead meadows in Fullford in the 1990's, and on Scarcroft Green in 2011

5.87 Many of the district's public rights of way (PROW's) are now used purely for recreational purposes. But historically they had a number of purposes such as drove roads, Roman roads, and tow paths. Today they form important direct access to the countryside and cross-country links between neighbouring settlements; and long distance routes such as The Minster Way and the Ebor Way pass through the city centre. These beneficially devised long distance routes on existing public rights of way connect a variety of landscapes and make cultural/historical references. The Minster Way links the north's two probably most famous Minsters - Beverley and York. The Ebor Way (named after Eboracoum) created in 1970 connects Helmsley with Ilkley and passes alongside the river Foss and Ouse and is led beyond the city's boundaries to the Wharfe along the line of a Roman road.

5.88 Designed suburban villages - The model village of New Earswick, contemporary with Saltire and Port Sunlight, was founded by the York philanthropist Joseph Rowntree. Today it continues to provide a good example of the contribution that generous and thoughtfully laid out open space, private gardens, and landscape detail, especially grass verges, street trees and hedges, can make to the perceptions of well being through good design. The Foss, integral to the eastern side of the village, provides added amenity and recreational benefit, plus immediate access to the larger countryside. Similar principles were applied to much of Tang Hall which was designed and laid out by the City of York Corporation, where streets such as Fifth Avenue, Melrosegate, etc. were laid out with private gardens bound by hedges, wide grassed verges adorned with avenues of Lime trees; and included public parks alongside Tang Hall beck & Osbaldwick Beck, and provision of allotments.

Landscape and setting

6.29 On a national scale York's landscape is considered generally not to be of a particularly high quality. Nonetheless it does include a range of features of natural, historical, and cultural significance that contribute to the special qualities of the local landscape. This is also the landscape that serves a substantial population, thus placing great importance on the amenity that it affords. The landscape provides the city and its outlying villages with a rural setting and a direct access to the countryside, and thus has a value/status that reaches beyond the relative quality of the aesthetic landscape.

6.30 Its relevance lies in the conglomeration of layers and relics of old landscapes, in part conserved through time by continuous administration, absence of development, and centuries of traditional management. It is the combination of the various elements such as the lngs and strays that provides York's unique make up. The natural environment is significant in its concentrated collection of a variety of examples of historically managed landscapes, represented for example by wild flower meadows, lowland heath, valley fen, strip fields, veteran orchard trees, species-rich hedgerows. Many of these otherwise isolated remnant landscapes link up with other open spaces resulting for example from our industrial or war time past, to form often accessible tracts of subtly diverse landscapes; thus the landscape/natural heritage is much greater than the sum of its parts.



*The
Knaveomire,
part of
Micklegate
Stray and an
important part
of York's green
infrastructure.*

Annex 4 – Analysis of Land East of Metcalfe Lane in Strategic Housing Land Availability Assessment



Strategic Housing Land Availability Assessment
Site Based Proforma for Suitability

SITE NUMBER:
106a



Site Details

GENERAL	
Site Reference	0099, 2538
Name of Site	Land East of Metcalfe Lane
Address	Adjacent to Metcalfe Lane and Langton House
Ward	Osbaldown
Easting	463,157.69 Northing 452,368.97
Gross Site Area	12.79 ha

PLANNING STATUS		
Current Land use	Pasture Land	
Source of site	Call for sites and Alternative site at changes 3	
Site Status	Potential site	Yes
	With permission	No
	Under Construction	N/A
	Completed	N/A
	Excluded	N/A
Planning Status (if applicable)	Permission Type <small>(residential, employment, other than etc. sites)</small>	None
	Application Reference	N/A
	Date permitted	N/A
	Date Expired	N/A
	Number of units outstanding	N/A
	Number of units completed	N/A
	Application not valid <small>(returned without or lapsed)</small>	N/A

Suitability Assessment		
Criteria	Considerations	
Primary Constraints	<ul style="list-style-type: none"> Not situated within Flood Area 3e adjacent to the south No nature conservation area within proximity of the site Not within a designated character, historical area 	Amber
Location Suitability	<ul style="list-style-type: none"> This site is adjacent to the York urban area This site is within the Draft Greenbelt This site is within an area identified as strategic Open Space by the My Diagram of the Core Strategy (Sept. 2011) This is a Greenbelt site Site is mainly considered to be at low risk of flooding (lines 1&2. Level does contain a small area of 3a to the south) 	Red
Transport and Accessibility	<ul style="list-style-type: none"> Access to Osbaldeston primary school within 800m No access to a GP Surgery within 800m (Tang Hall Lane surgery - 900m) Access to convenience stores within 800m including Osbaldeston Village parade and Farnesia Aelius parade which includes a Jacksons grocery store Good access to non bus route bus routes within 400m (No. 11) Good access from part of the site to a frequent bus route (15 mins or less) within 400m (No. 6) Access to cycle routes within 100m on Metcalfe lane Transport Assessment Required - mitigation works likely Needs to be considered in conjunction with approved Metcalfe lane scheme 	Amber
Geo Environmental Considerations	<ul style="list-style-type: none"> Currently no known air quality issues but potential for increased traffic in vicinity of site and elsewhere on network, causing congestion and air quality problems Records show some areas of infilled land on site, which may have caused land contamination. Will require desktop study and site investigations onsite. No known noise issues 3 sets of overhead power lines cross the site in different places A Full drainage assessment would be required No known TPOs on site 	Red
Strategic Policies	<ul style="list-style-type: none"> This site is within the draft greenbelt This site is not designated open space This site has access to city parks, natural/semi natural green space, amenity green space, outdoor sports facilities, children's play areas and allotments within PROXY acceptable distances This site is deficient in access to local parks and young people's facilities Osbaldeston ward has a deficit of natural and semi natural open space (-7.17ha), amenity green space (-4.10ha), children's play space (-0.62ha), facilities for young people (-0.77ha), outdoor sports facilities (-3.13ha) and allotments (-0.88ha) against recommended local standards This site is not located within 50m of listed buildings, an Area of Archaeological Importance, Scheduled Ancient Monuments, historic park and garden or special woodland Part of this site is located within Osbaldeston conservation area 	Amber
<p>Comments: This is a Greenbelt site located on the edge of the urban area. Parts of the site have good access to services such as bus routes and grocery stores but this is not consistent across the whole site. A transport assessment would be required and mitigation works are likely. An increase in traffic on the route may have knock on effects for air quality elsewhere in the network. Further studies and land contamination are also required. This site is located within an urban area and has good access to most types of open space however it is within Osbaldeston conservation area. There are deficiencies in open space provision in Osbaldeston ward including amenity green space, children's play space, natural and semi natural open space and outdoor sports facilities so it is important that opportunities to increase the provision of high quality and accessible open space are maximised in new development. As the site is within the extent of York's Greenbelt it is unlikely to come forward and is identified through the core strategy key diagram (Sept. 2011) as an area of Strategic Open Space in connection with areas of search should they be required.</p>		
<p>Recommendation: This site is considered unsuitable for development</p>		



Site Details

GENERAL			
Site Reference			
Name of Site	Land East of Melville Lane		
Address	North of Yang Hall Beck South of Hill View		
Ward	Osbeidwick		
Easting	463 164.06	Northing	463 399.25
Gross Site Area	4.57 ha		

PLANNING STATUS		
Current Land use	Pasture Land	
Source of site	Alternative site at changes 3	
Site Status	Potential site	Yes
	With permission	No
	Under Construction	N/A
	Completed	N/A
	Excluded	N/A
Planning Status (if applicable)	Permission Type <small>(residential, employment, retail, mixed use, other)</small>	None
	Application Reference	N/A
	Date permitted	N/A
	Date Expired	N/A
	Number of units outstanding	N/A
	Number of units completed	N/A
	Application not valid <small>(delayed/withdrawn/assess)</small>	N/A

Suitability Assessment		
Criteria	Considerations	
Primary Constraints	<ul style="list-style-type: none"> Not located within Flood Zone 7c adjacent to the South No nature conservation areas within proximity of the site Not within a conservation character appraisal area 	Amber
Location Suitability	<ul style="list-style-type: none"> This site is adjacent to the York urban area This site is within the Draft Greenbelt This site is within an area identified as Strategic Open Space by the Key Diagram of the Core Strategy (Sept 2011) This is a Greenfield site Much of the site is proposed to be at low risk of flooding (Zone 1A, 2) but to the south are areas of 5a defended 	Red
Transport and Accessibility	<ul style="list-style-type: none"> Access to Humberland primary school within 800m No access to a GP Surgery within 800m walking (Whitby drive 900m) No access to convenience stores within 800m Whitby drive and best bargain (one parcels both 950m) along walking route Good access to non frequent bus routes within 400m (46, 11 & 200000) No access to a frequent bus route (15 mins or less) within 400m No access to cycle routes within 100m Transport Assessment Required - mitigation works likely Needs to be considered in conjunction with approved Masterplan scheme 	Red
Geo Environmental Considerations	<ul style="list-style-type: none"> Currently no known air quality issues but assessments would be required Records show some areas of infilled land on site, which may have caused land contamination. Will require desktop study and site investigations initially No known noise issues One overhead power line crosses a corner of the site A Full drainage assessment would be required No known TPOs on site but trees are present, particularly to the east 	Amber
Strategic Policies	<ul style="list-style-type: none"> This site is within the draft greenbelt This site is not designated open space This site has access to neighbourhood nature/open spaces and outdoor sports facilities within PPG17 acceptable distances This site is deficient in access to city parks, local parks, amenity green spaces, allotments, children's play areas and young people's facilities Osbaldeston ward has a deficit of natural and semi natural open space (7.17ha), amenity green space (-4.10ha), children's play space (-0.62ha), facilities for young people (-0.77ha), outdoor sports facilities (-3.13ha) and allotments (-0.99ha) against recommended local standards This site is not located within 50m of listed buildings, an Area of Archaeological Importance, conservation areas, Scheduled Ancient Monuments, historic park and garden or ancient woodland 	Amber
<p>COMMENTS: This is a Greenfield site located on the edge of the urban area. The site has very poor access to all services except non frequent bus routes and is isolated from the larger area by Tang Hall Beck. A transport assessment would be required and mitigation works are likely. Further studies into land contamination are also required. This site is nearby located within low flood risk but is directly adjacent to the back with some areas of slightly higher frequency waters. The site has very limited access to most types of open space within acceptable PPG17 distances and there are deficiencies in Osbaldeston ward including amenity green space, children's play space, natural and semi natural open spaces and outdoor sports facilities so it is important that opportunities to increase the provision of high quality and accessible open space are maximised in new development. As this site is within the extent of York's Greenbelt it is unlikely to come forward for housing unless directed by the core strategy. In the core strategy document this site is identified through the key diagram (Sept 2011) as an area of Strategic Open Space in connection with areas of search should they be recovered.</p> <p>Recommendation: This site is considered unsuitable for development</p>		



Site Details

GENERAL	
Site Reference	
Name of Site	Land East of Melcote Lane
Address	North of Oulgang Industrial Estate and dismantled railway
Ward	Cesardwick
Easting	453,673.00 Northing 452,332.54
Gross Site Area	11.11ha

PLANNING STATUS		
Current Land use	Pasture land, inert waste recycling centre and caravan site	
Source of site	Alternative site at changes 3	
Site Status	Potential site	Yes
	With permission	No
	Under Construction	N/A
	Completed	N/A
	Excluded	N/A
Planning Status (if applicable)	Permission Type (residential, employment, mixed use, other)	Former sewage works to strip here and inert waste recycling centre
	Application Reference	07/01243/FUL
	Date permitted	N/A
	Date Expired	N/A
	Number of units outstanding	N/A
	Number of units completed	N/A
	Application not valid (reason/withdrawn/issued)	Completed

Suitability Assessment		
Criteria	Considerations	
Primary Constraints	<ul style="list-style-type: none"> Not situated within Flood Area 30, but adjacent to the south and east Not a natural conservation site, SNC site 57 - Osbalbeck Meadow to the south Not within a conservation character assessment area 	Amber
Location Suitability	<ul style="list-style-type: none"> This site is adjacent to the York urban area (industrial estate) This site is within the Draft Greenbelt This site is within an area identified as Strategic Open Space by the Key Diagram of the Core Strategy (Sept 2011) This is a Greenfield site The site sits in the north of the site to the west of the (existing works) and within flood zone 2 with a 1 in 100 year annual probability of flooding 	Red
Transport and Accessibility	<ul style="list-style-type: none"> No access to a primary school within 800m (Osbalbeck Primary within 1000m) No access to a GP Surgery within 600m (Tang Hall Lane 1000m) Access to convenience stores within 800m including Osbalbeck Village garage and Farmale Avenue garage which includes a car wash, petrol station Good access to non bus route bus routes within 400m (247) Good access to a frequent bus route (15 mins or less) within 400m (No. 6) No Access to cycle routes within 100m Transport Assessment Required - mitigation works likely Needs to be considered in conjunction with approved Material use scheme 	Amber
Geo Environmental Considerations	<ul style="list-style-type: none"> Site is directly adjacent to an industrial estate, which does and has contained high contamination risk industries further detailed investigation needed Records show some areas of infilled land in close proximity of site, which may have caused land contamination. As well as a former sewage works within the boundary and a cement recycling centre. Will require further study. Noise, dust and smells generated by the adjacent industries could be an issue. B54142 assessment needed Potential for increased traffic in vicinity of site and elsewhere on network causing congestion and air quality problems Two overhead power lines cross the site A full drainage assessment would be required No known TPOs on site and trees are protected and may require evaluation 	Red
Strategic Policies	<ul style="list-style-type: none"> This site is within the draft greenbelt This site is not designated open space This site has access to outdoor sports facilities within PPS17 secondary districts This site is deficient in access to local parks, city parks, Amenity Open Space, natural semi natural green space, allotments, children's play areas & young people's facilities Osbalbeck ward has a deficit of natural and semi natural open space (-7.17ha), amenity green space (-4.10ha), children's play space (-6.62ha), facilities for young people (-0.71ha), outdoor sports facilities (-3.15ha) and allotments (-0.28ha) against recommended local standards This site is not located within 50m of listed buildings, an Area of Archaeological Importance, Scheduled Ancient Monuments, historic park and garden or ancient woodlands Part of the site is located adjacent to Osbalbeck conservation area. 	Amber
<p>CONCLUSION: This is a Greenfield site located on the edge of the urban area. Parts of the site do have access to a mixed number of services such as frequent bus service. A transport assessment would be required and mitigation work will likely. This site only links into the urban area through an industrial estate, which provides contamination, noise and air quality issues to any prospective development. The site also contains a skip hire company, metal waste recycling centre, electricity pylons and is close to areas of infilled land. This site is close to areas of known flood risk and is in proximity of a SNC site and Osbalbeck conservation area. The site is deficient in access to almost all types of open space within accessible distances and there are deficiencies in provision throughout the ward, so it is important that opportunities to increase the provision of high quality and accessible open space are maximised in new developments in this area. As the site is within the extent of York's Greenbelt it is unlikely to come forward for housing unless directed by the core strategy. In the core strategy document this site is identified through the key diagram (Sept 2011) as an area of Strategic Open Space in connection with areas of search should they be required.</p> <p>Recommendation: This site is considered unsuitable for development</p>		

Site Suitability		
Criteria	Considerations	
Primary Constraints	<ul style="list-style-type: none"> Not situated within Flood Zone 3b No nature conservation areas within footprint of the site Not within a greenbelt character appraisal area 	
Location Suitability	<ul style="list-style-type: none"> Adjacent to the York urban area Within an Area of Search identified by the Core Strategy (Sax 2011) Greenfield Considered to be at low risk of flooding (Table 1A2) 	
Transport and Accessibility	<ul style="list-style-type: none"> Access to Ousebridge primary, Hamstead Primary St Almonds RC Primary - 800m Access from part of the site is within 800m from a GP Surgery (Whitey Drive) Good access to convenience stores on Red Bank Lane within 400m Good access to non frequent bus routes within 400m (No 11, 46) Good access from part of the site to a frequent bus route (15 mins or less) within 400m (No 4) Good access to cycle routes within 100m on Newlands and Metcal Lane Transport Assessment Required - mitigation works likely Needs to be considered in conjunction with approved Metcal Lane scheme If brought forward as an urban expansion mass should be opportunities to further enhance facilities and accessibility through careful master planning 	
Geo Environmental Considerations	<ul style="list-style-type: none"> Currently no known air quality problems Records show some areas of infilled land in the vicinity. Will require desktop study and site investigations initially Potential for increased traffic in vicinity of site and elsewhere on network No known contamination One discharge point into process part of the site A full drainage assessment would be required No known TPOs on site but trees are known to be in the area and could require assessment With an area of the site a range of open environments concerns are identified in different parts of the site these issues however do not detract the site if the site came forward as an urban expansion master planning could be used to focus and phase development in the most sensitive way to minimise impact 	
Strategic Policies	<ul style="list-style-type: none"> Currently within the draft greenbelt but is within an Area of Search identified by the Core Strategy (Sax 2011) & could come forward in the longer term Not designated open space Access to natural/open natural green space, outdoor sports facilities and children's play areas within PPS17 accessible distances Delicant in access to local parks, city parks, amenity green spaces, allotments and young people's facilities Ousebridge ward has a deficit of natural and semi natural open space (7.77m), amenity green space (4.15ha), children's play space (0.62ha), facilities for young people (0.77ha), outdoor sports facilities (3.13ha) and allotments (1.03ha) against recommended local standards Not located within 50m of listed buildings, an AAL, conservation area, Scheduled Ancient Monuments, historic parks and gardens or special woodland 	
<p>Comments: This area is Greenfield and located within the local plan draft Greenbelt adjacent to the main urban area in an identified Area of Search within the emerging Core Strategy. Parts of the site have good access to services and facilities but could be further improved with planned development and new on site facilities to accommodate the potential increase in population. This site is located within low flood risk and has good access to most types of open space. There are deficiencies in a range of open space provision in Ousebridge ward and it is important that opportunities to increase the provision of high quality and accessible open space are maximised in new development. A transport assessment and further studies into land contamination and the location of overhead pylons would be required and mitigation works and careful master planning would be required. With an area of the site and the long term time frames that could be involved there is scope to allow for careful design to protect the most sensitive areas and time for improvements to infrastructure to be planned. As the site is within an Area of Search it could only come forward in the longer term, if it should be required, as a potential urban expansion - identified through the core strategy key diagram (Sax 2011).</p> <p>Recommendation: To consider this area for potential urban expansion should it be required in the longer term under a sequential approach through the Allocations DPD should there be sufficient Greenfield land and other suitable sites. Due to the policy status of the area it is considered to currently unsuitable.</p>		

Submission 2

This is a formal objection to Policy AHM3 contained in the draft York Local Plan preferred options paper that includes Chowdene Campsite, Malton Road (inc. Land off New Lane) as a site for 20 traveller's pitches. This objection can be read in conjunction with the wider Liberal Democrat submission analysing the flaws in the proposed plan.

Inclusion of the site is counter to the National Planning Policy Framework

National Planning Policy E: Traveller sites in Green Belt

14. Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development.

This site has previously been refused planning permission on the grounds of access to the site. The site is therefore unsuitable for use as a traveller's site as the proposed development would be likely to intensify the use of substandard access of restricted width. The increase in traffic using the access will predominantly be by vehicles with trailers/caravans. The access is taken from a classified highway which is a main artery into the city and carries high frequency public transport services. The limited width cannot be improved due to boundary features and land ownership issues, and will make access for cars towing trailers/caravans and HGV's particularly difficult. The restrictive width together with the increased frequency of use of the access will increase the likelihood of such vehicles having to wait on or reverse out onto A1036 Malton Road. Such manoeuvres would be detrimental to the safety of highway users, particularly vulnerable highway users such as pedestrians and cyclists using the adjacent shared pedestrian/cycle route. Furthermore the increased frequency of vehicles having to wait to enter the site or having to reverse into Malton Road will interfere with the free flow of traffic with associated detrimental impacts on service reliability to public transport routes including Park and Ride. Thus the development is considered to conflict with advice contained within the National Planning Policy Framework (section 4-paragraph 32) which states that decisions should take account of whether safe and suitable access to sites can be achieved for all people, and Policies T2a and V5 of the City of York Draft Local Plan.

Submission 3

This is a formal objection to the inclusion of land East of Metcalfe Lane as suitable for the siting of wind farms. This objection can be read in conjunction with the wider Liberal Democrat submission analysing the flaws in the proposed plan.

In the interest of brevity I would refer to submission 1 in regards the use of the land for housing. Points of particular relevance from that submission are

- Design and Conservation
- Public Opinion
- Consultation – with the additional comments that maps circulated to households outlining areas of development failed to show the proposed sites for wind farms.

ELVINGTON PETITION RE CITY OF YORK COUNCIL'S ADDITIONAL SITES PROPOSALS

Please provide your name, address & tick the column(s) for the site(s) that you object to. Please leave blank the columns for any proposals you do not object to. Thanks.

I object to the following proposed developments contained in CYC's additional sites proposals.

NAME	STREET ADDRESS	SITE 747 - GYPSY & TRAV. SITE	SITE 22 - TRAVELLING SHOW PEOPLE SITE	SITE 802 - SAFEGUARDED RESIDENTIAL LAND	SITES 97 & 815 - SAFEGUARDED INDUSTRIAL LAND

York Local Plan
Development of Green belt Area

Residents against the above

Name

Address

Signature