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N.B. Individual comments in full can be viewed at the Council Offices at 9 St Leonard’s Place. Please contact the Council on 01904 551466 for further information.
Information on the Issues and Options Consultations

1. Introduction

1.1 The purpose of this report is to summarise the Core Strategy Issues and Options consultations, which the Council undertook in Summer 2006 and Autumn 2007. The responses from these consultations combined with new technical work have been used to develop ‘preferred options’ on which the Council is now consulting.

1.2 The first step in preparing the Core Strategy was to consider the key issues and options facing York. To aid this discussion an initial document was produced which outlined some of the key issues facing York and possible options for addressing these. This document, now referred to as ‘Issues and Options 1’, went out for consultation from 6 June until 21 July 2006. To ensure that the Core Strategy would be deemed ‘sound’ the Council decided to undertake a second round of issues and options consultation, known as ‘Issues and Options 2’. This consultation ran from 17 September until 31 October 2007 and was held jointly with the consultation on the review of the Sustainable Community Strategy. This consultation was also known as ‘Festival of Ideas 2’.

1.3 This report outlines the different consultation documents that were produced; sets out who was consulted; outlines the methods and techniques used during the consultations, and summarises the key issues raised in the responses received.

2. Consultation Documents

2.1 A number of documents were produced as part of the consultations, to inform people about what the process involved, how they could respond, and also ways in which they could contact the City Development team.

2.2 For Issues and Options 1 the following documents were produced:

- Core Strategy Issues and Options document;
- Executive Summary Issues and Options document;
- Sustainability Statement;
- Leaflet;
- Poster; and
- Comments Form.

2.3 As well as the issues and options document itself, it was considered appropriate to prepare additional supporting material in recognition of the different groups the Council were trying to involve. Therefore the Executive
Summary was produced which sought to explain what the consultation process was about, but also asked key questions under the different topic areas. Furthermore, the leaflet and poster were designed to raise awareness of the consultation and the LDF in general. These were more widely distributed (as set out in paragraph 3.5) and provided a way of reaching the general public who might otherwise not get involved.

2.4 Similarly, for Issues and Options 2 the following documents were produced:

- Core Strategy Issues and Options 2 document;
- Sustainability Statement;
- Festival of Ideas 2 Questionnaire;
- Flyer;
- Poster; and
- Comments Form.

2.5 Prior to consultation on Issues and Options 1 and 2, the documents were both subject to an initial Sustainability Appraisal. Sustainability Appraisal (SA) forms an integral part of the LDF and will be undertaken at key stages alongside the production of each Development Plan Document (DPD). The purpose of SA is to promote sustainable development through the better integration of sustainability considerations into policy development. The Sustainability Statements for the Core Strategy Issues and Options 1 and 2 consider the key sustainability issues arising from both of the Issues and Options documents. They were published in June 2006 and August 2007 to support the Issues and Options consultations.

2.6 There were several ways in which people and organisations could comment on the Issues and Options documents. These were by:

- filling in the comments form;
- writing to the City Development team using the address found in the documents, posters and leaflets;
- emailing the City Development using the email address found in the documents, posters and leaflets; or
- using the electronic comments form which could be found on the Council’s website;
- Completing the ‘Festival of Ideas 2’ Questionnaire (note: this was only available during Issues and Options 2).

3. Document Distribution / Publicity

Issues and Options 1

3.1 The packs were sent out to over 500 contacts. A list of all those consulted is set out in Appendix 1. Specific consultees received packs containing:

- Consultation Letter;
• Core Strategy Issues and Options document;
• Executive Summary Issues and Options document;
• Sustainability Statement;
• Leaflet; and
• Comments Form.

All other contacts in Appendix 1 received packs containing:

• Consultation Letter;
• Executive Summary Issues and Options document;
• Leaflet; and
• Comments Form.

Issues and Options 2

3.2 The packs were sent to almost 600 contacts. A list of those consulted is set out in Appendix 1. Specific consultees received packs containing:

• Consultation Letter;
• Core Strategy Issues and Options document;
• Festival of Ideas 2 Questionnaire;
• Sustainability Statement; and
• Comments Form.

All other contacts in Appendix 1 received packs containing:

• Consultation Letter;
• Festival of Ideas 2 Questionnaire;
• Flyer; and
• Comments Form.

3.3 In addition to this all of the documents were made available to view on the Council’s website, in the 15 City of York Council libraries (including the mobile library), and at the Council’s receptions at the Guildhall and City Strategy.

3.4 The Festival of Ideas questionnaire, which was a joint questionnaire on the Core Strategy and the Sustainable Community Strategy was distributed to every household in the city (A copy of the questionnaire is set out in Appendix 2).

Wider Distribution

3.5 At both stages posters and either leaflets or flyers were distributed to schools, places of worship, community and leisure centres, GP surgeries and major employers. They were asked to display them where they could be viewed by the public, employees and students, as appropriate. The posters and leaflets contained information about what the consultation process was about and how to obtain further information, and gave instructions on how comments could be made.
Media

3.6 In addition to distributing the documentation, the Council sought to further publicise the consultation and give details on how and when comments could be made.

3.7 For the Issues and Options 1 consultation the Council published a press release, which resulted in two radio stations (Minster FM and BBC Radio York) requesting interviews. The consultation featured in five of the Council’s ‘Your Ward’ newsletters. These are sent out to households within wards in York every 3 months. This newsletter enables the Council to contact residents with agendas for committee meetings, generic items, and other specific local issues and matters of interest. The consultation also featured within an internal newsletter called ‘News and Jobs’ which is published fortnightly and distributed to Council staff.

3.8 A press release was also issued for Issues and Options 2 and an article on the Festival of Ideas consultation appeared in ‘Your City’, a Council publication which is distributed to every household in the authority area.

4. Consultation Events

4.1 Details on each event held as part of the consultations are outlined below. Timetables of all the events are set out in Appendix 3.

Exhibitions

Issues and Options 1

4.2 The Council organised exhibitions at three locations across the City. These exhibitions were advertised in both the radio interviews and also on the Council’s website. These were:

- two exhibitions at supermarkets, one on 27 June 2006 – Askham Bar, and the other 30 June 2006 – Clifton Moor; and
- two exhibitions in the City Centre, using the mobile exhibition unit in St Sampsons Square which took place on 20 and 21 June 2006.

Issues and Options 2

4.3 For this round of consultation exhibitions were again advertised on the Council’s website but also within the initial letter which was distributed to all consultees. The exhibitions included:

- City Summits held at the Park Inn – 16 October 2007 (one in the afternoon, one in the evening);
- two exhibitions at supermarkets, one on 23 October 2007 – Clifton Moor and the other 24 October 2007 – Askham Bar. We also had an exhibition at a DIY superstore on 26 September 2007; and
- three exhibitions in the City Centre, using the mobile exhibition unit on Parliament Street which took place on 4, 5 and 6 October 2007.

4.4 The City Summits were a joint consultation event undertaken as part of the ‘Festival of Ideas 2’. It was a one day session which invited members of the public and interest groups to take part in an “ask the audience” style survey. The results of the survey are included in the summaries in Section 6.

4.5 For the exhibitions information on the Local Development Framework (LDF) and the key issues for the Core Strategy were set out on display boards and leaflets and other consultation material was made available for people to take away. Officers were also available to answer questions about the consultation.

4.6 In addition to wider consultation and awareness raising, the Council also carried out more targeted and in-depth consultation with certain groups, in the form of workshops, forums and meetings.

**Workshops**

**Issues and Options 1**

4.7 Five workshops were held over the consultation period, and formed a major part of the consultation process. The following topic areas were covered:

- Sustainable Forms of Transport held on the 28 June 2006;
- Economic Wellbeing through Sustainable Economic Growth held on the 3 July 2006;
- Community Development Needs held on the 6 July 2006;
- Sustainable Location of Development held on the 11 July 2006; and

4.8 Each workshop started with a presentation on the LDF and the Core Strategy, and then a short presentation was given on the issues and options surrounding the specific topic. A series of key questions were presented to encourage a debate. Key people from a variety of groups were invited to the workshops including individuals representing major retail, transport and business interests, people representing local interest groups and other interested individuals. The comments from these workshops have been incorporated into the overall summary of comments set out in section 6 of this report.

**Issues and Options 2**

4.9 Two workshops were held as part of the consultation. The workshops were:
• Hard to reach groups/environment workshop held on the 18 October 2007; and
• Talkabout Panel workshop held on 30 October 2007.

4.10 The hard to reach groups/environment workshop was attended by 21 people. Invitees to the workshop were drawn from the hard to reach groups listed in para 5.11 of the Statement of Community Involvement. Attendees included representatives from the Older People's Assembly, York Council for Voluntary Service, York Homeless Forum, Age Concern and York Mental Health Forum. The workshop was also attended by representatives from environmental interest groups including Greenpeace, LA21 Citizen's Forum and Friends of the Earth.

4.11 The Talkabout Panel workshop was attended by 28 people. The Talkabout Panel is York’s citizen’s panel. Its 2,300 York residents are broadly representative of the city’s population in terms of age, gender, social group and geographical area.

4.12 Both workshops were held in ‘carousel’ style. They began with a short presentation setting the context for the Issues and Options 2 document and then attendees spent 25 minutes at each of the four ‘stations’ covering the spatial strategy, the environment, housing and employment and location of development. The comments from both of these workshops have been incorporated into the overall summary of comments set out in section 6 of this report.

Forums

Issues and Options 1

4.13 Officers attended a number of local forums to discuss the key issues and options within the Core Strategy. In each case, Officers presented the key topics within the document and then discussed the issues and options.

4.14 The largest forum was held on the 14 June 2006 when the Council was invited to a joint meeting organised by the York Professional Initiative (YPI) and the York Property Forum (YPF). These groups promote themselves as ‘The voice of York professionals’ and come from a range of disciplines including financial, property, architecture, and marketing. For this particular forum, after the presentations, the members of the YPI and YPF were split into groups and the issues were discussed in detail. The comments from this forum have been incorporated into an overall summary of comments received as part of the consultation. The summary is set out in section 6 of this report.

4.15 In addition to the above, Officers attended the following local forums:

• The ‘Inclusive York Forum’ (12 June 2006), remit to champion issues of inclusiveness whilst promoting the active engagement of communities of interest.
The ‘York Environment Forum’ (13 June 2006), remit to advise, discuss and comment on policies and strategic issues that effect the environment and monitor the implementation of the Community Strategy as it effects the environment.

The ‘York Open Planning Forum’, (12 July 2006), community led forum which holds public meetings to discuss particular planning issues.

**Issues and Options 2**

4.16 For the Issues and Options 2 consultation we again met with the ‘York Environment Forum’ (25 September 2007) to discuss the progress made so far and allow for any outstanding issues to be discussed.

4.17 Instead of attending the Inclusive York Forum we held a hard to reach groups workshop (see paragraph 4.9). At the time of the consultation it was not possible to attend the Open Planning Forum because it had been temporarily suspended.

**Meetings**

**Issues and Options 1**

4.18 Officers met with Network Rail on 7 July 2006. Originally a member of the Network Rail team was invited to the workshop on sustainable forms of transport, however several members of Network Rail were interested in attending the workshop. It was therefore decided that a separate meeting would be set up in which specific rail issues could be discussed.

4.19 Network Rail were keen to be informed of the LDF and the emerging Core Strategy document. They were also very keen to discuss some of the existing and emerging rail issues within York. These included rail improvements, the re-opening of existing lines and potential funding bids. The comments from this meeting have been incorporated into the overall summary of comments, which can be found in section 6 of this report.

**Issues and Options 2**

4.20 Officers attended several ward committees during the Issues and Options 2 consultation. Officers did a short presentation on the second Issues and Options document and then took questions from local residents. The following committees were attended:

- Dringhouses and Woodthorpe – 1 October 2007
- Haxby and Wigginton – 1 October 2007
- Guildhall – 2 October 2007
- Clifton – 3 October 2007
- Westfield – 8 October 2007
- Hull Road – 9 October 2007
- Fishergate – 10 October 2007
• Micklegate – 11 October 2007
• Rural West – 17 October 2007
• Skelton, Rawcliffe and Clifton Without – 18 October 2007
• Derwent, Heworth Without and Osbalдwick – 29 October 2007
• Bishopthorpe and Wheldrake – 6 November 2007
• Heworth – 14 November 2007 (Ward Committee followed School Event)

Meetings with Specific Consultees

4.21 As part of the ongoing discussion of Issues and Options, officers met with several specific consultees to discuss their responses to consultation to date and, more generally, to talk through some of the key issues. Where relevant comments from these meetings have been included in the summary in section 6 of this report. The following meetings took place:

• Natural England – 17 March 2008
• Yorkshire Forward – 4 February 2008
• Sport England – 8 February 2008
• Environment Agency – 22 February 2008
• English Heritage – 29 February 2008
• Internal Drainage Boards – 3 March 2008
• Highways Agency – 3 March 2008
• Yorkshire and the Humber Assembly – 4 March 2008
• Primary Care Trust, Ambulance Trust and Fire Service – 11 March 2008
• Yorkshire Water and Northern Gas Networks – 27 February 2008

5. Consultation Response

5.1 A total of 932 separate responses were received as a result of the first consultation from 124 respondents, and 1560 responses were received as part of the second consultation from 78 respondents. 2330 people responded to the Festival of Ideas 2 questionnaire. Respondents for both consultations included a variety of groups, organisations and individuals.

5.2 To support the production of York’s LDF, the Council have compiled a database to include the individuals and organisations that have registered an interest in the York LDF process. The responses from both of the Core Strategy Issues and Options consultations have been logged on the database and summarised. A summary of the key issues raised in the responses is set out in Section 6 of this report.
Summary of Responses to Issues and Options Consultations

The following sections set out a summary of the main issues raised by respondents in response to both Issues and Options consultations. The summaries have been grouped under the relevant sections of the Preferred Options document to enable them to be read alongside the Preferred Options approach to each topic. Each summary primarily outlines the response to the Key Issues and Options and then covers any other general comments received from respondents.

6. General

6.1 At both Issues and Options stages a number of respondents made general comments and these have been summarised below.

Clarity

6.2 At both Issues and Options stages respondents made general comments about the clarity of the documents. This included requests to reduce jargon, use plain English, amend the format of the document and improve the quality of the maps at Issues and Options 1. At both stages respondents sought clarification of certain terms such as ‘sustainable’ and ‘spatial’ and asked that we were clearer about what we were referring to when we say ‘the environment’, ‘historic character and setting’ and ‘York’ or ‘the City’ - are we referring to the city centre, the urban area or the authority area? Some felt that the Core Strategy appeared too focused on city centre and failed to acknowledge that York is more than its city centre.

Level of detail

6.3 In response to Issues and Options 1 there was disagreement between respondents as to whether the document included too much detail or too little. In the case of the former, some respondents felt that in many of the topic areas, it would be more appropriate to deal with some of the issues in the Development Control Policies DPD or in Supplementary Planning Documents (SPDs) rather than in the Core Strategy. Similarly for Issues and Options 2, one respondent felt that the document contained inappropriate and unnecessary policy appropriately covered by legislation or national and regional policy.

Policy context

6.4 At both stages, respondents also sought further clarification on the policy context. Respondents felt that the LDF as a whole should be better explained, showing how the Core Strategy fits with the other LDF documents and SPDs. This should also provide assurances that they will be produced at an early stage. They also argued that the relationship with the Community Strategy and Local Area Agreements should be explained. Respondents at both stages highlighted the requirement for the Core Strategy to be in conformity with the RSS. They highlighted the need to reflect the latest RSS
position and argued that more reference should be made to RSS policies in each section.

6.5 Many respondents to Issues and Options 1 argued that the LDF should not refer to the Local Plan. Across a number of topic areas respondents were also keen that examples of best practice from elsewhere were considered.

**Topics covered**

6.6 An overarching theme in many responses was that Issues and Options 1 did not adequately consider the linkages and dependencies between different topic areas, the potential conflicts between different options and the need to balance various factors.

6.7 Other key issues raised were that the Core Strategy should be more positive about what it seeks to achieve and that it does not adequately address a number of issues, including green belt, security and crime, environmental capacity, rural issues and areas outside the main urban area, and open space, landscape and trees.

6.8 In response to Issues and Options 2, respondents questioned the overall approach asking for the document to be restructured around different aspects of the environment, or stating that the document fails to present a true range of options, storing up more difficult conflicts for later on.

**Evidence base**

6.9 At Issues and Options 2 stage, respondents raised concerns with the evidence base, arguing that it was outdated or inadequate. Suggested omissions were an Environmental Capacity Study, a study defining the historic and landscape character areas and more evidence in respect of housing and employment.

**Environmental protection**

6.10 Issues and Options 1 included a section on environmental protection (section 15) which sought to tackle existing pollution problems. Many of the issues covered in this section will be dealt with outside the LDF process, whilst others have been covered in other sections of Issues and Options 2 such as Transport and Flood Risk. In response to Issues and Options 1 respondents suggested that pollution problems (including noise and air) should be identified (for either new or existing developments) and limits should be put on future developments to minimise the impact of this pollution. They felt that emphasis should be placed on reducing air pollution, especially that from traffic. Some suggested implementing a citywide air quality zoning system, with accessible data to influence people’s travel choices. Some suggested air pollution could be reduced by supporting development close to existing Park and Ride sites. However by zoning the City some thought this could possibly restrict tourist development in the future. It was suggested that there needed to be more information on environmental protection and more detail. People recognised that there is a need for an overall traffic plan. It was noted that no reference has been made to PPS23 or to primarily using brownfield land for development.
7. **Background**

7.1 The content of the background section of the Preferred Options document was covered in both of the Issues and Options documents. In Issues and Options 1 it was covered in the ‘Snapshot of York’ within the Vision section and in Issues and Options 2 it was covered in the Spatial Portrait section. These sections were largely factual and did not ask any specific questions, so there were not a high number of comments. The comments mainly related to the request for additional information to be included and where appropriate the Preferred Options document has included these.

7.2 In response to Issues and Options 1 we received a number of detailed comments from respondents stating what else should be covered in this section. These included key historical events; biodiversity issues; higher education results; the office market; and wider community and leisure uses.

7.3 Comments were also made which requested more detail on particular issues such as the opportunity for rivers, floodplains and strays to be utilised for recreation and biodiversity; outlining of measures to protect from flooding; more discussion on the operation of transport interchanges and alternatives to the private car and the role of villages.

7.4 Some respondents sought clarification on a few issues or disagreed with statements set out in the section, including disagreement with the significance of the Retail Study, arguing that York competes with other locations regarding the tourist offer not on the basis of retail. Some respondents queried whether the 480ha of open space mentioned covers informal open space and open space belonging to Parish Councils or the Joseph Rowntree Foundation. It was also requested that the list of historic buildings should be varied to include a wider range of types of properties.

7.5 At the Issues and Options 2 stage, some respondents felt that the Core Strategy needed to recognise the importance of connections between York and Leeds and links with York’s sub-region. It was considered that regional cooperation on a wide range of issues will be important in developing environmentally sustainable economies and that the LDF should be consistent with the Regional Spatial Strategy (RSS).

7.6 It was felt by some that the snapshot should identify key employment sites, especially those which deliver Science City York. People felt that it was important to show that York attracts a growing population and has a diverse employment base, i.e. people and businesses like to be here.

8. **Vision**

8.1 The LDF Vision has been developed through both Issues and Options stages. The Key Issues raised in the Issues and Options documents mainly looked at whether the vision should be created with direct linkages to the Sustainable
Community Strategy (SCS) and what objectives should be used to deliver the LDF vision.

**Key Issues and Options**

8.2 Issues and Options 1 asked whether the SCS vision and objectives should be adopted for the LDF or whether a whole new vision should be devised. Issues and Options 2 offered more specific options in relation to these key issues. Across both Issues and Options consultations a number of respondents made comments on the links to the SCS. Some emphasised that the LDF should deliver the SCS and that the Council would need to provide clear justification for a vision and objectives which were completely different to the SCS. Conversely, other respondents suggested that the SCS vision was not meaningful or adequate for the Core Strategy, and that it would need significant revision to be used as a basis for the LDF.

**Vision**

8.3 A number of respondents felt that the vision for York needed to be locally distinctive and more strongly emphasise its unique character, by considering those aspects which contributed to this special character.

8.4 In response to Issues and Options 2 Key Issue 1.a, a clear majority of those who responded supported option 2. This option indicated that to create the vision for the LDF the SCS vision together with other planning issues should be adopted in order to create a unique LDF vision. It was felt that in doing so it should have sustainable development at its heart. Respondents felt that the vision should set out how we see York developing over the next 20 years. It should address the key issues identified through the evidence base and have regard to all relevant plans and programmes that will influence the future of York, including RSS.

**Objectives**

8.5 In response to the Key Issue in Issues and Options 1 concern was raised that more detailed spatial planning objectives would actually be required to guide development in York. Concerns were raised over using the SCS Sustainable City Objectives as these were felt to have little connection to spatial planning. Respondents stated that the spatial planning objectives should be more detailed and should set out which policy areas they refer to, and in some cases should be more ambitious and positively worded. A number of respondents suggested additions or detailed amendments to the spatial planning objectives to add clarity or to address perceived omissions. Suggestions included making reference to both the built and natural environment in objective 4 and sports and active recreation in objective 3, and referring to accessibility, natural resources and reducing crime.

8.6 Issues and Options 2 contained a more detailed list of objectives and Key Issue 1.b asked about how they should be used to deliver the vision. A number of respondents expressed general support for the objectives. It was argued that we should set out the origins of the objectives and that they should be developed from the vision to provide the broad direction for more
detailed strategy and policies. Some respondents suggested that most of the objectives are not objectives, but ‘givens’, which should form the basis of the vision such as RSS requirements.

8.7 At Issues and Options 2 a number of respondents suggested additional objectives as well as commenting on the content of existing objectives. For example, one respondent said it would be useful to identify an objective to ensure that sufficient land is available to accommodate future housing and employment development. Another respondent indicated that an additional objective supporting development and expansion of a sustainable central business district and Science City York, bringing forward strategic sites and highlighting the importance of financial and professional industries should be included.

8.8 Option 2 of Key Issue 1.b asked whether some of the objectives should have priority. Many respondents felt that the objectives should be ordered to reflect priorities or suggested that they should be placed into categories such as environmental, economic, social and transport. It was suggested that there should be an indication of the trade-offs and potential conflicts between different objectives and that an explanation should be included to outline how the objectives will be met and monitored.

8.9 The respondents to the Festival of Ideas questionnaire identified the top priorities as: reducing our impact on the environment (63%); developing the economy, jobs and skills (59%); improving travel within, to and from York (55%); and building strong, safe and healthy communities (54%). At the City Summits the priorities were identified as: prosperity from which all can benefit (39%); and enhancing York’s special character (40%).

Other Comments

Measuring Sustainability

8.10 Converse views were expressed regarding the Ecological (Eco) Footprint Tool. Whilst some considered that a key goal of the LDF should be to reduce York’s eco-footprint, others felt that the Tool was not a practical measurement tool on a citywide basis. The need for an environmental capacity study was raised as a better alternative to Sustainability Appraisal for measuring environmental impact. One respondent considered that it was inappropriate to use the term ‘most sustainable’, suggesting the use of ‘low impact’ or ‘less damaging’ instead. It was also questioned whether sustainable economic growth could be achieved. In response to Issues and Options 2, it was highlighted that reducing York’s eco-footprint should be part of the overall vision rather than an individual objective.

9. Spatial Strategy

9.1 Both stages of Issues and Options consultation considered the range of factors that should be used to determine the location of future development. Issues and Options 1 generally outlined the main factors. Issues and Options
2 focused firstly on defining a settlement hierarchy, to steer growth in its broadest sense; and secondly to more detailed influences which could refine York’s approach to growth. The Green Belt was discussed in both Issues and Options documents as part of the Spatial Strategy and a summary of these comments can be found in Section 10 of this consultation statement.

Key Issues and Options

9.2 Issues and Options 1 asked whether the correct factors to determine the future location of development had been identified. A number of respondents considered that the correct factors had not been identified and that other factors over and above those identified should be considered such as highway capacity, Green Belt boundary, access to a wider range of facilities, access to non-car transport modes, drainage, infrastructure quality, pollution, air quality, market demand, global environment change and limited natural resources. It was also considered crucial that location is informed by an environmental capacity study and that cross-boundary issues with other local authorities are considered. Respondents considered that all the factors identified should be applied to both urban and non-urban sites and that the employment criteria should be applied to all types of development. Some respondents also felt that the factors needed to be prioritised.

Broad influences on the spatial strategy

9.3 Key Issue 2.a of Issues and Options 2 asked which broad influences should determine the location of future growth. The majority of respondents to this issue supported option 1, which prioritises accessibility by distributing development to the settlements which offer the best access to jobs and services. Overall respondents were generally supportive of directing the majority of growth to within, or adjacent to, York’s main urban area in preference to further expansion of villages. Although it was also recognised that growth in villages may sometimes be appropriate to support local services and provide for affordable housing need. It was also highlighted by one respondent that the RSS allows for open market housing to be developed in rural communities to meet locally identified need, and that the hierarchy should be reworded to reflect this. Where comments were made in relation to growth within villages, some of the larger villages were considered to offer the best opportunities to accommodate growth, given their relatively good access to jobs and services.

9.4 Respondents recognised that access to services may vary between settlements, but many also felt that development could enable the provision of new services where needed. Some felt that access to public transport should feature more heavily, given the opportunities this offers for people to access services more widely than within their local neighbourhood.

9.5 Respondents to the Festival of Ideas questionnaire were split regarding the location of new development, 45% of respondents felt that it should be directed to the main urban area of York, whilst 36% felt that it should be directed to York and to the outlying villages. When asked which villages should take development, 77% favoured an even spread throughout the
villages. Although some identified specific villages, mainly due to their accessibility, these included Poppleton, Strensall, Elvington, Haxby, Dunnington and Knapton.

**Detailed influences on the spatial strategy**

9.6 Key Issue 2.b in Issues and Options 2 asked which detailed influences should refine the approach to the location of development. Whilst all were considered important, many respondents felt that preservation of the historic character and setting of York was the most significant factor. Respondents emphasised the importance of understanding what makes York special, to properly consider the potential impact from development; to balance character against the need for the City to grow, to protect important views, and to distinguish between the different values of each of the historic character and setting categories. The following comments were made in relation to the other listed influences:

- **Nature conservation:** that we should consider the implications of the Habitats Directive 92/43/EE, and protection of all wider biodiversity as well as just protection of sites;
- **Flood risk:** a number of respondents argued that no development or only minimal development should be allowed in floodplains, and that the LDF should be informed by further detailed analysis of flood risk.
- **Commuting:** should not just be about numbers but more about mode of travel;
- **Congestion:** the LDF should be seeking to reduce the amount of traffic on the roads in York not just tackling congestion.

9.7 Key Issue 2.c questions whether there are any other key influences. A number of additional influences were suggested by respondents, including:

- the need to prioritise brownfield or previously developed land over greenfield sites;
- the need to define green infrastructure;
- the need to consider archaeological deposits;
- that consideration should be given to the influence of growth patterns in neighbouring authorities (e.g. at Escrick) which could inform our own spatial strategy;
- the achievability and deliverability of sites;
- access to sustainable transport hubs;
- the protection and enhancement of existing communities;
- the role of the outer ring road in providing a barrier between the urban edge and the wider green belt; and
- landscape character assessment, to understand and consider the role of the best quality agricultural land and landscape.

**Other Comments**

**Types of development**

9.8 Some respondents queried the types of development which were covered in the spatial strategy and felt that it should cover a wider range of development types including leisure, retail, sports and open space.
9.9 In both Issues and Options documents the influences on the spatial strategy were approached without explicitly considering the levels of housing or employment to be directed to any one place. Respondents to both consultations highlighted that an indication of the scale of new development needed and the amount of land required should be set out. While comments were broadly supportive of the description of the settlement hierarchy ‘tiers’ in Issues and Options 2, it was felt that the hierarchy should be quantified in terms of the proportion or number of homes/ha of employment land to be directed to each settlement.

9.10 One respondent argued that the spatial strategy should include the regional or sub-regional picture from the RSS. They also felt that the section should set out how the overall principles might be translated into patterns of development on the ground and how there would be different ways of addressing the needs that are identified through different spatial options. Several respondents noted that the spatial strategy had not yet set out broad locations for growth, and that this is a key requirement in producing a sound spatial strategy.

Alternative approaches

9.11 In terms of alternative approaches, some felt consideration should be given to an urban extension as an alternative to village expansion since growth may be preferable on certain greenfield sites and as part of selective urban extensions, provided it meets sustainability objectives and supports an identified need for development. The concept of a standalone new settlement or eco-town was mooted, offering self-sufficiency in its provision of services and employment opportunities. This concept was considered by some to be preferable to increasing the size of existing villages.

9.12 In response to both Issues and Options consultations there was some debate around the merits of urban concentration versus suburban sprawl. Some felt that protection of the Green Belt was paramount, and that the spatial strategy should encourage higher density urban living to meet housing demands; others, that urban open spaces should be protected and some land on the urban edge released for development in order to create new communities with supporting services.

10. Green Belt

10.1 York’s Green Belt has been covered under a variety of sections in both Issues and Options documents. Key Issues centred on its role in influencing the spatial strategy and its primary purpose and lifespan. The discussion on York’s Green Belt in the Issues and Options has been underpinned by the Approach to the Green Belt Appraisal (2003).

Key Issues and Options

10.2 The main reference to Green Belt in Issues and Options 1 was in relation to the spatial strategy which asked about the key factors that needed to be
considered when determining the location of future development in York and what should influence the pattern of development. Respondents identified the preservation of the Green Belt as being a vital concern and some felt that it was not adequately addressed and should have its own separate section. Other respondents specifically referred to the role of the Green Belt in preserving the historic character and setting of York as a key factor in determining the location of future development.

10.3 Issues and Options 2 again linked the importance of the Green Belt to the development of the spatial strategy (Key Issue 2.b) as well as relating the lifespan of the Green Belt to housing and employment growth (Key Issue 3.a). In addition Key Issues 15.a and 15.b specifically addressed the primary purpose of York’s Green Belt.

10.4 In relation to Key Issue 2.b, several respondents identified that preserving the historic character and setting of York (as recognised in the Green Belt Appraisal evidence base) is a key influence that should be considered when refining the approach to the location of development.

10.5 The majority of respondents supported option 1 of Key Issue 3.a to run the Green Belt until 2029. Although some highlighted that the LDF should reflect the revised RSS timescale to accommodate growth beyond 2026, and therefore even 2029 is unlikely to be sufficiently long term. It was suggested that we should consider 25 years as a minimum, but more reasonably 30 years.

10.6 In response to Key Issue 15.a, most people felt that the primary purpose of the Green Belt was to preserve the setting and special character of York. Although one respondent argued that (in line with PPG2) the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Respondents felt that to be able to define a Green Belt, which fulfils the primary purpose, an assessment needs to be undertaken of what capacity the historic city has to accommodate further growth. They felt that to imply that the LDF will identify sufficient land to meet the development needs of the City and then define Green Belt boundaries would be incompatible with the need to safeguard the special character and setting of the historic city.

10.7 On the whole, it was felt that the three factors listed under Key Issue 15.b (green wedges; areas that provide an impression of a historic city; and the setting of villages whose character is of historical value) were of equal importance when considering the Green Belt purpose of preserving the setting and special character. Some respondents suggested additional factors that should be considered. One argued that those areas which regulate the size and shape of the city, thus helping to safeguard the City from adverse effects which might arise from unregulated growth, should be important in Green Belt terms. Another argued that the agricultural use of some land provides a distinctive element to the character of York and this should be recognised.
Other Comments

**General**

10.8 On the whole, respondents wanted to see more reference to the protection of the Green Belt from development. Some respondents felt that the Core Strategy should contain a clear and firm commitment to the preservation of all Green Belt land identified in the existing York draft Local Plan.

10.9 Some respondents felt that areas of Green Belt, which border Conservation Areas, should be given additional protection as they make a special contribution to preserving the historic setting of the city.

**Green Belt boundary**

10.10 Respondents were keen that a permanent boundary for York be established but were also keen that existing boundaries were reviewed. It was thought that boundaries should be permanent and that the Core Strategy should not imply that they may be flexible into the future. Respondents argued that the boundary should not be too tightly drawn; that they should exclude the areas of land that it is not necessary to keep permanently open and should then be an absolute constraint on any future development. The LDF should set a long-term defensible boundary so that sustainable growth of York can be assured.

**Safeguarded land**

10.11 Safeguarded land was raised as an issue for the Core Strategy, it was viewed by some respondents as essential to provide flexibility across the lifespan of the Green Belt. One respondent suggests that the LDF should define the extent of safeguarded land and as a minimum the Core Strategy should set out the criteria by which it will be identified. Some respondents felt it was also important to identify certain developments as major developed sites in the Green Belt.

**Development in the Green Belt**

10.12 It was suggested that a sensitive yet pragmatic approach is applied to certain forms of development in the Green Belt. Some respondents agreed that facilities to generate renewable power may need to be located within Green Belt. A number of respondents felt that the LDF should take a more positive approach to the management of Green Belt land citing its opportunities for enhancement in terms of wildlife, tourism and recreation.

**Extent of Green Belt Protection**

10.13 Some respondents felt that the Green Belt protects other communities, such as the villages, as well as the main urban area of York and more emphasis should be placed on the needs and aspirations of Parishes. Several comments related to the detail of establishing a permanent Green Belt for York, such as: that existing previously developed sites close to the main urban area should be excluded from the Green Belt; that local and strategic issues should be considered separately; that there should be reference to the RSS policy of a Green Belt 6 miles from the city centre; and that no areas outside of the ring road should be considered as ‘extensions of green wedges’ as they won’t fulfil the main purpose of York’s Green Belt.
Green Belt Assessment

10.14 In response to both Issues and Options consultations a number of respondents identified the need for a full assessment of York’s Green Belt, particularly in terms of its role in preserving the historic character and setting of York. A number questioned whether the Green Belt Appraisal had been based on any detailed landscape or historical appraisal of the open land in and around the city.

11. York City Centre and York Northwest

11.1 At the Issues and Options stage, neither document contained sections on the city centre and York Northwest. However, the Preferred Options document includes sections on these two key areas as part of the overall spatial strategy. The Council is preparing Area Action Plans (AAPs) for each of these areas and has already carried out Issues and Options consultation for the two documents. Information on the comments received as part of these consultations will be available separately. However, issues relevant to each of these areas have also been discussed across many of the topic areas covered in the Core Strategy Issues and Options consultations and are therefore covered in the different sections of this summary document.

12. York’s Special Historic and Built Environment

12.1 The City’s many eras of architectural design have had a strong influence on modern York and, as such, both Issues and Options documents dealt with urban design and the protection of York’s historic fabric as interlinked issues at this strategic level. Questions around sustainable design and renewable energy included at Issues and Options 1 were picked up in a separate section in Issues and Options 2 (Design and Construction) and again in the Preferred Options document (section 15: Resource Efficiency). Therefore a summary of these responses is covered in section 20 of this document.

Key Issues and Options

12.2 Both Issues and Options papers focused on how we could better understand York’s context and character in order to influence the highest quality of new design and protect the City’s unique heritage assets. The Key Issues in sections 5 and 11 of Issues and Options 1 and Key Issue 6.a and 10.a of Issues and Options 2 all asked about the principles we should use to underpin our approach to design and the historic environment.

12.3 Overall, respondents to both consultations felt that the LDF should restate the Council’s duty to preserve and enhance historic areas, and seek a higher standard of design across the City, recognising the need for different
approaches to development within the city centre and elsewhere. Respondents emphasised that the Council have a duty to develop policies that will preserve and enhance the character and appearance of conservation areas. The majority of respondents supported using the Commission for Architecture and the Built Environment (CABE) urban design principles, but supplementing these with other standards, for example by including principles which are specific to York. The key aim seemed to be to only allow development where it reinforces York’s local character. Some argued that the Core Strategy is not the place to market CABE principles, which may be overly prescriptive, and that these should be in an Supplementary Planning Document (SPD). It was recommended that the Council adopt guidance set out in PPG16 for archaeology, and PPG15 - planning for the historic environment.

12.4 In response to Key Issue 10.a, the majority of respondents supported the production of a local list. The response to producing a local list was especially strong through the Festival of Ideas consultation where over 85% of respondents felt it important to have a better understanding of the character of buildings and places in suburban and village locations which do not currently benefit from statutory protection. It was agreed that the Core Strategy should strengthen the approach to Village Design Statements, Town and Parish Plans and the Local List. Respondents considered that the Core Strategy should outline the Council’s intention to support the production of Conservation Area Appraisals and management plans, and further guidance in the form of SPDs.

12.5 One respondent indicated that the 2007 Heritage White Paper which supports the development of local lists and/or the identification of locally important elements of the historic environment through development plan policies should be used as a key evidence base within the Core Strategy.

Other Comments

12.6 A primary concern raised by a number of respondents was that the level of growth discussed elsewhere should take account of the impact on the historic environment. One respondent also maintains the need for an Environmental Capacity Study to underpin York’s future growth.

12.7 In recognition of the different character areas across the city, some respondents felt that design policy should not rule out tall buildings or contemporary architecture in parts of the city where it could reasonably be accommodated. It was felt that the Core Strategy should also recognise that new development in appropriate out-of-centre locations can play a role in reducing the visual impact upon more historic areas.
13. Housing Growth, Distribution and Density

13.1 Both stages of Issues and Options consultation dealt with the levels of future housing growth and discussed issues around density and mix. Whilst Issues and Options 1 was guided by draft RSS, Issues and Options 2 was informed by the report of the RSS panel and the Council’s Housing Market Assessment which was published after Issues and Options 1. Respondents’ comments on housing growth, density and mix are summarised below, comments on the distribution of housing are covered in section 9.

Key Issues and Options

Housing Growth

13.2 The annual level of housing directed to York has fluctuated throughout Issues and Options consultation due to the emerging RSS, which was not formally adopted until May 2008. As a result, in response to Issues and Options 1, respondents raised concerns about the fact that no overall housing figures were included and that this meant it was difficult to assess what impact the figures would have on issues such as market demand, commuting and the special character of the city. To allow for due debate around the issue, Issues and Options 2 (Key Issue 3.b) presented a range of housing growth options based on various pieces of evidence: the Submission draft RSS; the RSS Panel Report; and the Strategic Housing Market Assessment (SHMA). It also presented a lower option to reflect concerns about York’s capacity to accommodate higher levels of growth.

13.3 A number of respondents felt that there needed to be greater clarity regarding the housing figures emerging through the RSS. Most respondents thought that the Core Strategy should reflect the most up-to-date RSS figures and the latest study of local housing need, representing a figure closer to providing a robust future mix/affordability level for York. It was also felt that York needed to have sufficient flexibility to accommodate the possibility of increased housing numbers that might arise through a further review of RSS.

13.4 The Festival of Ideas questionnaire asked a similar question, comparing emerging RSS figures with past rates of housing growth in York. Responses over housing growth were divided. Overall, two thirds of respondents were in favour of building at or higher than the emerging target rate of 630 new homes each year, of which 28% were in favour of building around 880 new homes a year and 14% thought more than 880 homes should be built.

Density, Mix and Type

13.5 Using past housing monitoring figures, Key Issue 3.c of Issues and Options 2 set out three options to guide future housing density. Three main issues were raised in response:

- that option 2 would help redress the imbalance in flatted development v family housing (this reflects the current local plan approach whereby different minimum development densities are set in place for the city
centre (60dph), the urban area (40dph) and remaining villages (30dph));
• that a minimum development density of 30dph be established in policy, as advised by PPS3;
• that development densities in the city centre should not be replicated out-of centre, and that a broader mix of housing types should be provided across the city.

Some felt that defining densities in broad areas of the city would be reasonable or useful; others felt options were too prescriptive and that it would be more appropriate to recommend a range of densities in different localities/sites (not all sites in city centre suitable for high density), possibly just to set minimum densities within general locations rather than upper limits.

13.6 Key Issues 4.d and 4.e asked about providing housing for the needs of specific groups. In general, there was support for housing to be provided to meet the needs of all special needs groups, such as housing for families (rather than flats), younger people (perhaps with a youth warden), those who require wheelchair access or have visual or auditory handicaps, first time buyers, single people and young professionals to match the growth in Science City York and high tech employment, key workers, and the needs of people who will work from home.

13.7 A number of respondents felt that greater priority should be given to housing for older persons and those with special needs, with a focus on providing a wide mix of types ranging from residential care homes both private and public to sheltered or warded accommodation (both flats and houses) and lifetime homes.

13.8 In relation to student housing, some felt that it should be the responsibility of the universities to provide affordable accommodation for a greater percentage of their students and where possible provide on-campus, whilst others considered that in order to provide for better integration and a better mix, student housing should be distributed throughout the city.

Other Comments

13.9 In addition respondents were unclear as to whether the approaches identified would provide sufficient land to meet the RSS requirements.

13.10 It was suggested in relation to windfall figures that PPS3 specifically states that windfall allowance should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances.

Strategic Housing Market Assessment (SHMA)

13.11 As advocated by PPS3, most respondents felt that evidence from the SHMA should be used to support the Preferred Options, however there was disagreement about how sound the SHMA was as a basis for determining housing mix and type.
14. Access to Housing: Affordability and Type

14.1 Both Issues and Options consultations discussed the need for affordable housing and provision of housing for particular groups such as Gypsies and Travellers. As the Council’s SHMA was published after Issues and Options 1 stage, the focus of initial consultation was on the diverse range of housing types and tenures in York. Having received the findings of the SHMA, at Issues and Options 2 stage we were able to understand and debate specific issues around local need in more detail, such as options for future thresholds and targets for affordable housing.

Key Issues and Options

Affordable Housing

14.2 Three specific affordable housing issues were raised in Issues and Options 1 and Key Issues 4.a, b and c of Issues and Options 2, namely, the approach to:

- an affordable housing threshold and target;
- delivery in rural areas;
- mix of social rented and discount for sale.

14.3 There was universal recognition of the level of affordable housing need in York.

14.4 There were a few queries raised regarding the extent to which the SHMA could support continuing the Local Plan’s policy approach to affordable housing (50% on certain sites), claiming that it undermines the viability of many schemes and concerns were that the Council had not adequately demonstrated local need to justify the 50% figure as required by RSS. While some supported retaining a target of 50% (including 55% of respondents to the Festival of Ideas questionnaire), most respondents felt that the level of affordable housing should be reduced to a target closer to the RSS target of 40%, which would also be more consistent with neighbouring authorities, but that the threshold could be reduced below 15 dwellings /0.3 ha. Issues and Options 2 (Key Issue 4.b) recognised that the approach to providing affordable housing in rural areas may need to differ from that within the urban area, and asked about both the levels and thresholds for affordable housing. In relation to rural areas there was no one preferred option, but it was noticeable that a significant number of respondents felt that the current policy should change. A number of people also felt rural exception sites would be appropriate within the provisions of PPS3.

14.5 In terms of the type of affordable housing to be provided, respondents emphasised the need for a range of affordable types and tenures although a few were specifically mentioned, namely, affordable housing ‘to buy’ rather than ‘to rent’, shared equity schemes, targeted at specific groups such as older persons (to release family housing back onto the market) and to meet specific needs in rural villages.
14.6 In terms of the approach to delivering affordable housing, most respondents supported a mix of social rented and discount for sale, some with the proviso that the precise balance between social rented and "discount for sale" housing should be a matter for negotiation on individual sites. Some advocated different splits with a higher proportion for discounted sale. Respondents noted that policy wording should reflect the definition of affordable housing in PPS3 paragraphs 27 to 30, which does not include low cost market housing. Intermediate housing should be required. Some respondents felt there should be no requirement for social rented housing. One respondent objected to option 2 of Key Issue 4.c, to provide all affordable housing as social rented, because it would not create balanced and mixed communities. Others supported having 100% social rented.

14.7 In order to assist Officers with their research and to help understand the needs of other partners involved in providing affordable housing, a number of new initiatives have taken place during the last year:

- a round table session involving the 4 political leaders of the Council, together with local house builders, planning consultants and housing associations was held in February 2008;
- individual meetings with house builders and planning consultants operating in York were held during the Summer of 2008;
- in November 2008, a half day seminar/ workshop with over 40 key housing stakeholders was held to investigate new ways of maximising affordable housing, to further understand current concerns and to rehearse different options to address the challenges.

14.8 At these events there was no uniformity of views from developers and consultants on the 50% policy target. The larger house builders were generally of the view that the requirement to provide affordable housing was here to stay and that, so long as the policy was applied consistently, it is something they can work with irrespective of the actual percentage target. Their major concern was that landowners and land agents still have unrealistic expectations for land value and/or do not fully understand the impact of affordable housing provision on land values. There was also a view that agents were advising landowners to ‘sit tight’ and wait for the Council’s policy to change.

14.9 The larger developers, in particular, were supportive of a sliding scale approach to affordable housing being introduced with a much lower starting threshold than the current 15 homes. Their rationale is that as the major house builders on larger sites they contribute a disproportionate amount of affordable housing when any smaller developers who build from 1-14 homes are not expected to make any contribution to meeting affordable housing needs. Perhaps unsurprisingly, this was not a view shared by the smaller house builders who argued that the larger developments benefit from economies of scale. There was, however acknowledgement that smaller sites could have contributed some affordable housing.
14.10 Through the stakeholder workshop, there was significant support to reviewing current S106 Obligations and housing targets/policy.

**Gypsy, Traveller and Showperson Accommodation**

14.11 Providing housing for these groups was identified as a key issue in both Issues and Options 1 and 2 (Key Issue 4.e). Three key messages came to light through the consultation and emerging government guidance concerning Gypsy and Traveller housing needs, namely that the LDF should:

- meet at least the numbers of additional pitches identified by local assessments of housing need;
- allocate sites in Development Plan Documents; and
- reduce the number of unauthorised encampments/developments.

**Other Comments**

**Affordable Housing**

14.12 Other respondents suggested alternative policy approaches to affordable housing such as strengthening policy by specifying a number of bedrooms or a certain floor area or that applications with the highest level of affordable housing should be prioritised for consent in order to reach annual targets. A number of respondents felt that the policy approach needed to be more flexible in order to facilitate development on certain sites and have regard to economic viability, for example on the development of complex mixed-use brownfield sites. Others felt that the proportion of affordable housing on a site should be related to demonstrable need in that specific area. It was argued that working in partnerships between stakeholders would allow for greater flexibility and wider options.

**15. Access to Services**

15.1 This section considers the community stadium, built sports facilities, hospitals, emergency services, higher and further education, health, schools, local shops, community facilities and public transport. The majority of these services were discussed in both of the Issues and Options documents, with the exceptions of community facilities and emergency services. These were not covered in Issues and Options 2 because there were no new issues to discuss. The following sections outline the main issues raised by respondents to the Issues and Options for all key services.

**Key Issues and Options**

15.2 Both Issues and Options documents discussed a range of key services and highlighted the importance of delivering accessible and sustainable facilities which meet the needs of the residents of York. General comments on these services were that some of the options were too detailed for the Core Strategy. Some respondents found it difficult to prioritise between different types of community facility because they argued that they were all needed, however others felt that if there had to be priorities it should be health and
education. The location of all facilities was considered important to ensure good accessibility but also to direct them to areas of low flood risk.

City-wide services

Community Stadium/Built Sports Facilities

15.3 Built sports facilities were discussed in both of the Issues and Options consultation documents and the stadium was originally covered as part of this. Issues and Options 1 asked whether a policy approach should be developed based on: raising the quantity and quality of accessible sports facilities; protecting existing facilities; and filling in the gaps in built sports provision identified by Active York, including the provision of a new stadium. Key Issue 7.c in Issues and Options 2 built on the final point, focusing on how we should address the deficiencies identified by Active York. It asked whether we should seek to deliver provision related to all the deficiencies identified; whether some should be more of a priority, or whether we should prioritise other sports facilities not identified by Active York.

15.4 Not many people responded to the questions on built sports facilities, but of those who did, swimming pool provision was highlighted as a priority. During both consultations, respondents were critical of the current swimming pool provision within the city and of the decision to close the Barbican centre. In response to the Festival of Ideas questionnaire, building more swimming pools was the top suggestion when asked about new leisure facilities (14% of respondents), followed by more general sports facilities (6%). One respondent suggested that further consultation should be undertaken specifically to decide a course of action on swimming pool provision.

15.5 Specifically in response to Key Issue 7.c there was minority support for delivering the facilities identified by Active York in the Sport and Active Leisure Strategy (2008). One respondent questioned the work done by Active York asking whether it was based on population projections, whether it had taken account of aspirations to increase participation in sports, or considered the quality and capacity of existing provision. They also questioned why PPG17 is only mentioned in the context of open space as it also covers built sports facilities.

15.6 Priorities suggested by respondents were to build a permanent ice rink, the need for a new state of the art sports stadium, the provision of an athletics track, a public sports centre and more flexible indoor space provision across the city which could include climbing walls and similar facilities for young people. Respondents emphasised that provision should be based on the needs of the community. Respondents also highlighted the needs of more specialist sporting activities, with one respondent seeking recognition of the requirements of gliding clubs.

15.7 With regard to the location of new provision, it was suggested that York Central would be an ideal location, with high priority being given to the relocation of York Football Club to the site. Accessibility to sports facilities was identified as a priority, especially public transport access for the stadium.
Hospitals

15.8 Issues and Options 1 asked whether a policy approach should be developed based on facilitating the continued modernisation of the hospital. This highlighted the Hospital Trust aim to continually work to bring existing facilities up to modern standards and create facilities which meet changing healthcare needs. Key Issue 9.a in Issues and Options 2 focused more on the scale and location of facilities that should be provided, highlighting in particular the need for accessible provision.

15.9 Respondents to Issues and Options 1 highlighted the need for accessible healthcare provision and a number of responses sought improvements to hospital parking. Respondents to Issues and Options 2 emphasised the need for healthcare facilities generally to be accessible by modes of transport other than the private car. However, one respondent felt that the LDF should identify a new site for the hospital which they argued would be needed in the lifetime of the LDF.

Emergency Services

15.10 The emergency services were covered in the first Issues and Options document. This asked whether the LDF policy approach should be focused on ensuring that the emergency service providers can provide facilities in the most efficient locations to reduce call out response times. Only two responses were received with one respondent arguing that the location of new facilities should take account of environmental impact and another emphasising the need to consider flood risk when locating new facilities.

Higher and Further Education

15.11 Both Issues and Options documents recognised the role of higher and further education in York. Issues and Options 1 asked about a policy approach based on helping to facilitate the continued success of the University of York and other further and higher education establishments in the City. Key Issue 8.b in Issues and Options 2 specifically asked how we should provide for the needs of York’s further and higher educational establishments and in particular what should underpin the approach to the University of York. The former raised options concerning the promotion of public access to sporting or cultural facilities at educational institutions, ensuring a sustainable transport system, the provision of student housing and combining new development with current or identified educational sites. The latter included options on maintaining and enhancing the parkland setting of the university and/or providing for Science City York and research and development uses.

15.12 One message from respondents to the first Issues and Options was that the University of York needed to be better integrated into the City. A respondent suggested further university development within the city walls to help with this and developing general housing and retail as part of the university campus. No clear message emerged from responses to Key Issue 8.b in Issues and Options 2, with support being shown for all of the options put forward. With regard to the University of York, respondents felt that the density of the existing campus is so low that the setting could be maintained whilst still
incorporating considerable amounts of built development. Furthermore, it was felt that Science City York could develop in ways which do not require large amounts of floorspace or close physical proximity to the University. Comments were also made about York St John University suggesting that whilst the LDF should support both proposed and existing education sites it should also ensure sufficient flexibility to allow for ongoing estate restructuring.

Local Services

Health

15.13 In terms of health facilities, Issues and Options 1 outlined a policy approach that would facilitate the provision of services, such as health centres, in the most accessible locations for those using them. Key Issue 9.a of Issues and Options 2 expanded on this by considering the criteria for locating new health facilities in the city, and asking whether these should be small scale, and located close to where people live, or larger scale and located more centrally.

15.14 Respondents were supportive of the need to provide facilities in locations where they would be accessible to those that would use them, particularly highlighting elderly people. Although one respondent emphasised that the provision of health care facilities was dependent on the new Primary Care Trust (PCT) arrangements. In response to Key Issue 9.a, no option was clearly favoured as to the appropriate scale or location of these facilities. Although one respondent stated that major facilities should be directed to the sub-regional city of York to accord with the RSS. Many respondents emphasised the need for all facilities to be accessible by modes of transport other than the private car. Respondents highlighted the need to consider requirements arising from new development, particularly major developments such as York Northwest. Respondents were also keen to point out the need to raise the profile of preventative health care, through the promotion of healthier lifestyles with more opportunities for active recreation and participation in sport.

Education – Schools

15.15 Issues and Options 1 set out the principles that would guide the approach to education: ensuring provision reflects demographic changes; implementing shared use of education facilities; ensuring new facilities are appropriately located; and ensuring that new developments contribute to meeting the education needs they generate. Key Issue 8.a in Issues and Options 2 focused on the approach to new school provision asking whether we should identify new sites to meet future needs or whether we should consolidate facilities on existing school sites through the expansion of existing schools.

15.16 Respondents to Issues and Options 1 welcomed the dual use of school facilities, and considered that this should be secured through community use agreements. Where schools were to be closed or merged, it was argued that future use of the site should recognise the benefits the site had to the local community for example as informal open space, areas for wildlife or sports pitches and that these should be protected or alternative provision made.
Respondents agreed that sufficient education provision was important but more felt that improved accessibility was a priority, arguing that emphasis must be on local schooling places meeting the needs of new developments.

15.17 Respondents to Key Issue 8.a favoured identifying new school sites where a need was identified. It was highlighted that these should be in accessible locations with good transport links, particularly that schools should be within cycling distance of where pupils live. In the context of school provision for York Northwest, it was suggested that account should be taken of existing school provision in the locality.

**Local Shops**

15.18 Both of the Issues and Options documents highlighted the role of the range of retail centres in York. Referring to either the district centres of Acomb and Haxby, smaller village centres such as Copmanthorpe and Strensall or neighbourhood centres, such as Bishopthorpe Road. The Issues and Options emphasised the need for the provision of shops and services in more locally accessible locations, close to residential areas. Both documents asked about the location of future retail development. Issues and Options 1 includes options on concentrating on district centre retailing and assessing deficiencies in the provision of local convenience shopping and identifying opportunities for remediation. Key Issue 5.b in Issues and Options 2 included options on directing growth to the district centres (following the city centre), identifying new centres on York Northwest and recognising Monks Cross or Clifton Moor as district centres.

15.19 No overall preferred option emerged from responses to the Issues and Options consultations. However, there was a strong message of support for local shopping. Respondents felt that we should promote local shopping and support the provision of thriving shops and services in district centres, close to where people live. It was considered important that these should be local shops rather than larger chain stores. One respondent argued that the Core Strategy should be informed by an up to date study of local facilities. With regard to food stores, one respondent argued that these should be spread through suburban areas so that residents can access them easily on foot or by cycle.

**Community Facilities**

15.20 Issues and Options 1 specifically covered community facilities. Section 10 of the document highlighted the key role of the LDF in encouraging suitable and accessible social facilities. It outlines social facilities as covering a wide range of uses, such as community halls, venues for clubs and societies to meet, libraries, youth facilities and public houses.

15.21 Respondents made a number of general comments on community facilities. Respondents were concerned that the needs of older people had not been addressed and that there was minimal reference to, and provision for, younger people. Respondents recognised that communities require space to socialise and communicate, and felt that York is currently struggling to provide this. In addition, it was considered that the Core Strategy should recognise
the role and function of modern libraries, refer to the role of charitable organisations and be informed by demographic trends. With regard to libraries, it was suggested that more could be done with the central library by refurbishing it and opening it in the evenings. A number of respondents outlined the need for more venues and suggested the following: a major concert/show venue; more live music venues and spaces; an arts centre; and a big central meeting place, along the lines of a ‘town hall’, which has a range of rooms available for hire. One respondent argued that prisons should be recognised as community facilities.

Public Transport and Accessibility

15.22 Sustainable transport and accessibility were considered in both of the Issues and Options documents. Most of the comments made in response to these issues relate to transport infrastructure and are covered in the Preferred Options section on Sustainable Transport (see section 6.11 of this summary document and section 11 of the Preferred Options document). However, a number of comments relate specifically to access to services. Issues and Options 1 focused on measures which would help to reduce car usage. In this context it refers to improving public transport, and encouraging cycling and walking. Under the latter it highlighted the need for new development to be located where walking is a viable form of access. In Issues and Options 2, Key Issue 12.a asked what approach should be taken to address the transport issues currently facing York. One of the key options was to ensure that new development is located in close proximity to services and public transport.

15.23 Respondents to Issues and Options 1 agreed that essential services, such as GP surgeries, should be within walking distance of new development. Respondents argued that accessibility to public transport and proximity to key local services should be a vital factor in determining the location of new development. This would reduce the need to travel and where travel is necessary encourage journeys by sustainable modes of transport.

15.24 In response to Key Issue 12.a, option 7 was one of the two most favoured approaches (ensuring that new development is located in close proximity to services and public transport). A number of respondents suggested different accessibility standards, citing the standards included in the Proposed Changes to RSS (2007), Government advice indicating that 800 metres was an ‘easy walking distance’ or that a 10 minute walk time was reasonable.

15.25 A theme across both consultations was that there was a need to improve public transport provision, for example by increasing the frequency of services in some areas, and make more provision for walking and cycling, through better cycleways and pavements.

16.1 York’s economy was covered in both of the Issues and Options documents. The key issues centred around the level and location of employment growth in York and the character of York’s economy in terms of the type of jobs. The first stage of the Employment Land Review (ELR) influenced Issues and Options 2 and the second stage has fed into the Preferred Options document. The following sections outline the main issues raised in response to the Issues and Options for employment and the economy. The section in the Preferred Options document also covers culture and tourism, as it accounts for 51% of jobs in York, so the summaries below also cover the responses made to the culture and tourism section of Issues and Options 1 and the tourism section of Issues and Options 2.

Key Issues and Options

Employment Growth

16.2 Issues and Options 1 and Key Issue 3.d both asked about the level of employment growth. There was a balance between respondents who felt that the growth figure put forward at Issues and Options 1 of 19,000 was too low and those who thought it was too high. Concerns were raised in relation to the capacity of York to accommodate the levels of proposed employment growth and the increase in congestion that would result from more in-commuting. Some considered it more appropriate that the 19,000 jobs were achieved within the York sub-region rather than just in York. A number of respondents highlighted the need to balance the number of jobs against the number of homes.

16.3 In relation to Key Issue 3.d, the majority of respondents supported either option 1 (ELR figures) or the higher figures emerging through the RSS. Whilst it was recognised that the RSS would contain figures on future employment growth, several responses put more weight on the figures expressed in the emerging ELR. Alternatively, one respondent felt that the Core Strategy should identify which major employment projects it is able to support and make provision accordingly.

Types of Employment

16.4 The type of future employment was a key issue reflected in Issues and Options 1 and was picked up by Key Issue 3.e in Issues and Options 2. A number of respondents sought a wide range of types of employment to be recognised through the LDF, such as increased numbers of people working from home and small businesses, business start-ups and self-employment, as well as retail and leisure. There was not considered to be enough focus on high income employment, such as Science City York type uses. However, other respondents felt that there should be more recognition of the fact that York is still a low wage economy. They also felt that there is little demand for B2 type uses now in York, with some seeking recognition of the loss of traditional industries and advocating the need to avoid future closures.
16.5 In response to Key Issue 3.e specifically, there was general support for all types of employment although option 1 to support the continued development of Science City York and other knowledge-led businesses, received majority support. This was also reflected in the response to the Festival of Ideas questionnaire where there were high levels of support for all types of employment. Specifically 75% of respondents thought it was important that the Council supported Science City York and 68% felt that focusing on the hospitality and tourism industry was important.

Location of Employment

16.6 The location of new employment sites was addressed in Issues and Options 1 and 2 and a number of factors were put forward by respondents as being important for determining appropriate locations for employment. It was considered locations near good public transport that would result in the reduced use of the private car would be preferable and would make jobs more accessible to a wide range of people. Respondents felt that sites within the urban area would achieve this, therefore the majority of employment should be focused in York itself. In contrast some respondents felt that due to the historic value of the city centre, it might be more appropriate to develop satellite employment parks on the periphery of the urban area. It was argued that some sites in the green belt might be more sustainable in accessibility terms and should therefore be considered.

16.7 Key Issue 3.f dealt with site identification and broadly, respondents supported making use of brownfield land and promoting a hierarchy of locations, with a priority for city and district centres before considering other options. A few respondents specifically supported option 2, to prioritise market demands in identifying sites. One respondent argued that there was a need for further debate on the criteria used for selecting locations for employment development within the urban area.

Culture and Tourism

16.8 Section 9 of Issues and Options 1 and Key Issue 16.a of Issues and Options 2 asked about the key priorities that the Council should focus on to deliver modern tourist provision and to maintain the important contribution tourism makes to York's economy. Respondents were generally supportive of the approach put forward in Issues and Options 1, particularly making more use of the rivers and improving public spaces. Although respondents supported an improvement to the evening economy, it was felt it should relate to more than simply commercial considerations e.g. social, cultural and educational considerations and that there should be specific mention of the need to protect and promote theatres. A number of respondents specifically opposed the development of a luxury hotel, whilst others requested that a better definition of the cultural quarter was provided in the Core Strategy. Overall, there were concerns about managing the impact of visitors with a number of respondents pointing out the effects on other businesses of the 4 million tourists who come to the city, and that the section makes no reference to business tourism.
16.9 In response to Key Issues 16.a, respondents were again generally supportive of the priorities set out. Although a key concern was that the historic character and setting of the city needs to be preserved. Non-vehicular linkages were also identified as being important to reduce the impact of tourists and their cars on York. The needs of residents and visitors was also raised in response to this Key Issue, with some respondents arguing that we should prioritise residents over visitors, whilst others felt that improvements to cultural provision would benefit both residents and visitors.

16.10 Overall, respondents suggested that the Council should invest in ways of improving and enriching what is currently available within the City rather than increasing the current offer.

Other Comments

Amount of Employment Land

16.11 In addition to comments received about the proposed new employment figures, respondents commented on the need for the LDF to be informed by a full review of the amount and type of employment land required, including a review of existing sites. Whilst it was suggested that the priority should be the identification, allocation and delivery of necessary employment sites to meet employment objectives, others considered that it would be appropriate to allocate an excess of employment land in a range of sustainable locations in order to facilitate choice, movement and “churn” in the market, meet future demand or to accommodate higher levels of growth.

Loss of Employment Land to Other Uses

16.12 At both stages respondents expressed support for a more flexible approach to the reuse of employment sites for other uses, where they no longer met the market demand for employment. However, some respondents raised concerns about losing employment land to other uses, arguing that it was important to retain current employment land in employment use.

Rural Economy

16.13 A number of respondents felt that the economy sections did not provide sufficient consideration of the rural economy and employment, and the role of villages and local services.

Education and Training/Local People

16.14 Respondents identified a need for investment in education and training so that local people can fill the new jobs. They felt that developers and employers should be encouraged to use local labour skills and that the education sector, particularly the universities needed to recognise the links to economic growth, particularly with regard to Science City York. Overall, it was considered that the Core Strategy needs to review the types of jobs York wishes to encourage, it should emphasise more entrepreneurship and start-up businesses and recognise that some new technical and service sector jobs will not adequately replace jobs lost in the manufacturing sector.
Site Specific

16.15 A number of respondents made comments about specific employment sites. Some thought that Terry’s, Castle Piccadilly, and British Sugar should be mentioned as sites with employment opportunities. Others wished to see York Central prioritised and promoted as a mixed-use or central business district, although the Core Strategy should be realistic about timescales and what the site can accommodate as well as the need for satisfactory infrastructure. Monks Cross was also referred to as a site with opportunities for a sustainable, mixed-use development, although there were concerns that this had not been achieved due to lack of transport provision.

17. Retail Growth and Distribution

17.1 Retail was covered in both of the Issues and Options documents. The key issues centred on comparison retail (non-food), asking what should be the scale of future provision and where should new retail be located? Both Issues and Options stages were informed by the 2004 York Retail Study (Roger Tym & Partners). The following sections outline the main issues raised in response to the Issues and Options for retail.

Key Issues and Options

17.2 Issues and Options 1 and Key Issue 5.a of Issues and Options 2 both asked about the level of retail growth. Over half of the respondents to the Festival of Ideas questionnaire (55%) thought that we should not build more shops in the city centre, compared to 35% who felt that we should. However, responses to the Issues and Options documents were more mixed with equal numbers supporting either a rising market share or a falling market share. Notably for Issues and Options 1 there was little support for maintaining the current market share.

17.3 There were a lot of comments about whether or not York should focus on retail growth. Some respondents argued that the options for retail growth should not solely relate to the city centre, but should consider all retail in York. A number of respondents felt that all options should primarily consider the impact on York’s historic character, whilst others felt that options for growth should be dependent on traffic impacts. Many of these also stated that there was no need to compete with other shopping destinations because York offered something different and we should focus on unique character, protection of existing shops and qualitative aspects more than growth per se.

17.4 Some respondents highlighted that we should develop flexible retailing policies in light of the significant growth forecast for York and that we should seek to continually review retailing capacity, demand and viability for York.

17.5 Both Issues and Options documents also asked where any new retail development should be located. Most respondents supported giving priority to the city centre with possible extensions rather than identifying areas outside the city centre for retail growth. A number expressed support for the
development of Castle Piccadilly for retail. One respondent particularly highlighted the opportunities for retail expansion into York Central. In response to Issues and Options 2 Key Issue 5.b specifically, a number of respondents noted that RSS Policy YH4 states that Sub Regional Cities, such as York, should be the prime focus for shopping and that there are no identified lower order service centres in York where significant local level shopping development is acceptable. They felt that encouraging significant retail growth in centres outside the city centre would conflict with RSS policy YH4.

17.6 In contrast, several respondents suggested that where needed we should consider directing development to existing established out of centre retail locations. With some supporting the designation of Monks Cross and Clifton Moor as district centres. Others took a wider view and argued that policy should not limit future retail to named centres, it should also allow for retail development where it can meet wider sustainability, economic and social objectives, including meeting local needs.

Other Comments

General

17.7 A number of respondents felt that the existing evidence base for retail (2004 Retail Study) was flawed. Respondents asked why retail is not considered to contribute in employment terms. General points were also made about the fact that retail policy should be consistent with PPS6 and that retail allocations should be informed by the strategic flood risk assessment and the sequential test.

Types of Retail

17.8 A strong message from both consultations was that respondents supported maintaining the diversity of shops in York. There was support for more specialist and independent shops and for making more of the current market facilities, as well as suggesting the development of a permanent indoor farmers market. Some felt that more larger mainstream stores or department stores should be discouraged whilst others felt that these could have a positive impact on the city by acting as anchor stores. Similar views were expressed by respondents to the Festival of Ideas questionnaire. Of those who supported the development of more shops, top suggestions were that we needed more department stores and speciality shops. It was considered important to meet the retail needs of both residents and visitors. More generally, respondents thought that the approach to retail should consider the impact of internet shopping.

Food Shopping

17.9 There was widespread support for more food stores in the city centre and the provision of local convenience shops in district and local shopping centres. Some respondents argued that we should not develop more large supermarkets.
**City Centre**

17.10 A number of respondents supported general improvements to the city centre including: improving the means of delivering goods to the shops; improving the overall shopping environment of pedestrian areas and traditional streets; and encouraging a more extensive café culture. It was also suggested that any future retail expansion of the city centre should be circular rather than linear.

**Other Shopping Locations**

17.11 A number of comments specifically related to the existing out of centre shopping parks. One respondent argued that the role of Monks Cross and Clifton Moor as retail and leisure locations had been underplayed. Another argued that whilst Monks Cross was the main competitor for the city centre, the Macarthur Glen designer outlet encourages people to visit the city centre as people make combined trips. Another respondent queried the omission of both Selby and Tadcaster as shopping centres.

## 18. Sustainable Transport

18.1 Transport was covered in both of the Issues and Options documents. The key issues centred on addressing congestion, accessibility, and increasing the use of sustainable forms of public transport, reflecting the strategic themes of the Local Transport Plan 2 (LTP2) 2006 – 2011. The following section outlines the main issues raised in response to the Issues and Options for transport.

### Key Issues and Options

18.2 Within Issues and Options 1, the key issue introduced the topic of reducing dependency on the car. It set out several measures to help reduce car usage, including: demand management, public transport, walking and cycling. A number of respondents felt that all of these measures would play their part in reducing car usage. The following comments were made in relation to each of the measures.

#### Demand Management

18.3 Concerns were raised by some respondents in relation to the demand management method cited, with one respondent arguing that it was contrary to PPG13 and another suggested that cheaper parking should be allowed in the evening to help the evening economy. Overall, it was felt that restriction and pricing of parking spaces was not a suitable method as it would not affect through-traffic, although it was supported by some respondents. Other respondents suggested that a more suitable method would be to restrict car access and road priority into the city centre and give priority to public transport, walking, cycling and disabled access. Alternatively tolls or congestion charging were suggested as potential methods and it was argued that the Council’s intentions on congestion charges should be clearly stated within the Core Strategy. However, several respondents felt that congestion
Charges should only be introduced once traffic and/or pollution levels reach a certain threshold.

Public Transport

18.4 In response to Issues and Options 1 there was general support for increasing use of public transport as an alternative to the car and a number of respondents suggested ways that this could be facilitated. These included the development of a bus station close to the train station, improvements to strengthen park and ride facilities, new stations at Haxby and Strensall, reopening of redundant railway lines, improvements to the quality, efficiency, frequency and cost of public transport, better information about services, introduction of tram-train and introduction of smaller and greener buses.

18.5 One respondent felt that the role of bus travel had been overplayed. They argued that the statement that bus use has increased by 49% is misleading because most of this increase is due to the rise in Park and Ride use. Other respondents raised concerns about the proposals for new rail stops, tram-train and improved rail links. They highlighted that the Copmanthorpe line does not meet health and safety standards and is not viable for development. Likewise they argued that the Poppleton station is not feasible in operational terms.

Walking and Cycling

18.6 It was suggested by many respondents that the needs of cyclists and pedestrians should be given priority. It was agreed that essential services, like doctor’s surgeries should be within walking distance of where people live. Some recommended investing in Danish / Dutch style cycle paths, expanding the pedestrian zones and cycle lanes within the city centre and introducing more facilities like cycle parking shelters. Whilst others suggested that walking and cycling routes should be looked at strategically alongside green space planning.

18.7 Issues and Options 2 (Key Issue 12.a) asked what approach should be taken to address the transport issues currently facing York. This was split into two sections including measures set out within LTP2 and measures emerging since LTP2 which included introducing Tram-Train, improving rail facilities, new Park & Ride locations, dualling of the York Outer Ring Road, controlling of car parking in new developments, and locating new development close to services and public transport.

18.8 In response to Key Issue 12.a, respondents thought that those measures put forward in LTP2 which could be delivered through the LDF should be taken forward. In terms of the measures put forward since LTP2, there was some support for investigating the Tram-Train proposal and generally improving rail facilities. There was a mixed response to the dualling of the York Outer Ring Road, and twice as many respondents were cautious of the proposal compared to those that were in support of it. One respondent suggested that we make better use of the ring road by encouraging new development alongside it.
18.9 Respondents to the Festival of Ideas questionnaire felt that promoting the use of alternative forms of travel was the best way to tackle congestion, followed by locating new development near public transport, shops and other services.

Other Comments

18.10 A number of respondents identified alternative transport measures to consider such as making better use of the rivers as a transport route. It was suggested that consideration should be given to introducing a waterbus service or using the river to transport freight. Another suggestion was the use of car clubs (including moped clubs and car sharing lanes).

18.11 A few respondents felt that we needed to consider transport issues wider than the city centre, looking at cross-city links, rather than just into the city centre. They also considered that the need for integrated public transport interchange(s) should be seen as a priority.

18.12 Respondents felt that the Core Strategy should ultimately reflect the Regional Transport Strategy and should outline how the transport system will be monitored.

19. Green Infrastructure

19.1 At the Issues and Options stage, green infrastructure was not specifically covered as it is a relatively new concept. However, the components of green infrastructure namely the natural environment, open space and green corridors were addressed in the Issues and Options in the open space and natural environment chapters. The key issues raised during these consultations related mainly to types of green space that should be protected and designated. A key change since the Issues and Options is that the adopted Regional Spatial Strategy (RSS) now has a specific policy which requires local authorities to address green infrastructure through their LDFs. The following paragraphs summarise the main issues raised in response to the Issues and Options for open space and the natural environment.

Natural Environment

Key Issues and Options

19.2 Issues and Options 1 and Key Issue 11.a of Issues and Options 2 asked which aspects of the natural environment such as nature conservation sites, protected species, landscape value, river corridors and tree cover should be considered through the LDF and whether any should be given priority.

19.3 On the whole, respondents felt that all aspects of the natural environment were important and should not be prioritised above each other. Several respondents suggested that all of the options should be implemented through the Core Strategy.
Other Comments

General

19.4 Respondents recognised that private gardens and other small open spaces like ponds and village becks contribute to the natural environment. They suggested that a list of green sites should be produced in a similar way to listed buildings and that the links between green spaces and climate change should be recognised in the Core Strategy.

Trees

19.5 An increase in tree cover was supported by respondents and the creation of new community woodland was suggested. One respondent would like to see tree cover extended in a strategic way as part of green infrastructure and as a means of enabling adaptation to climate change.

Designated Sites/Species Protection

19.6 Respondents supported the protection of designated nature conservation sites although it was emphasised that there should not be any additional designations without strong justification. There was some support for the LDF to protect species of international, national, and regional importance, although some respondents felt that policies should protect all species and that specific ones should not be prioritised. It was suggested that irreplaceable habitats such as ancient woodland, should be protected.

Biodiversity Action Plan

19.7 Respondents emphasised the need to carry out a Biodiversity Action Plan (BAP) and outlined that the Core Strategy should include a policy that will help deliver the BAP targets.

Open Space

Key Issues and Options

19.8 Issues and Options 1 covered the issue of open space under the wider area of community facilities; it proposed the general protection and improvement of open space quantity, quality and accessibility. Respondents on this key issue highlighted the need to carry out an open space assessment.

19.9 Key Issues 7.a and b in Issues and Options 2 dealt with open space separately and set out options looking to identify which provision standards in terms of quantity, quality and accessibility of open space were most important. They also asked specifically about the types of open space.

19.10 In response to Key Issue 7.a, the majority of respondents favoured option 4 which stated that the quality, quantity and accessibility of open space should be considered equally important. In response to the main document there was a balanced response between improving the quality of existing open space and increasing the overall amount. However, the majority of respondents to the Festival of Ideas questionnaire (68%) felt that improving the quality of open space was most important. In addition it was felt that the perceived...
value of the space to local people should be considered. One respondent emphasised the need for open space provision to be based on an understanding of existing facilities, their efficiencies and failings, in order to establish future needs.

19.11 When responding to Key Issue 7.b, respondents considered that on the whole the Council’s Open Space, Sport and Recreation Study (2008) had covered the correct types of open space however it was suggested that there should be stronger protection of the following open spaces that are not identified in the study:
- small open spaces such as large back gardens;
- areas that have no formal designation;
- non-public open space with high amenity value; and
- woodland.

Other Comments

New Open Spaces

19.12 Respondents specifically identified the space around Clifford’s Tower for a green space in the city centre as well as including city centre green space on sites such as Hungate. Bishopthorpe was also identified by respondents as a location with need for children’s play facilities.

Green Infrastructure

19.13 In response to both Issues and Options documents, it was suggested that green infrastructure should be referred to and that policy topics in the Core Strategy and subsequent Development Plan Documents (DPDs) should cover the provision, protection and enhancement of green infrastructure including public open spaces, green wedges and links, wildlife corridors and stepping stones. It was also highlighted that the Council should consider adopting SPDs on the inclusion of green infrastructure, green space standards in new development and using landscape character to underpin and guide decisions on development.

Allotments

19.14 Some respondents felt that there was a need for more allotments in York. One respondent suggested that the LDF should require large development sites of over 200 homes to provide allotment space.

20. Resource Efficiency

20.1 Resource efficiency was covered in two different chapters in Issues and Options 1 (Sustainable Design and Construction – Section 5 and Renewable Energy – Section 16) which were then combined into one section in Issues and Options 2 (Design and Construction – Section 6). The key issues centred on energy efficient design and the production of renewable energy, asking what forms of renewable energy should be encouraged and the threshold should be for on-site energy generation. The following sections outline the main issues raised in response to the Issues and Options for resource efficiency.
Key Issues and Options

Design and Construction

20.2 Issues and Options 1 suggested a number of factors that should underpin our approach to sustainable design and construction and asked whether any should be given priority. Some respondents put forward different priorities for the factors identified, but a number considered that all the factors were important. Overall respondents felt that the LDF should be seeking a higher standard of design and that York should be a world leader in ‘eco-development’. A number of respondents considered the LDF should require developers to incorporate certain sustainable design measures and to introduce targets and minimum standards specific to York. Although, other respondents considered that the introduction of a blanket requirement was unreasonable and fails to take account of individual site circumstances and constraints outside the developer’s control. One respondent particularly highlighted that certain standards, such as an aim for zero emissions, may discourage proposals for refurbishment of existing buildings. Others also suggested that requirements should be flexible because sustainable design is a rapidly evolving area and some suggested that developers should be encouraged to ‘do more’ than just the minimum requirement.

20.3 A number of respondents felt that the design and construction requirements should be expanded to refer to: water efficiency; allowing space for the separation and segregation of waste; design to enable flexibility across the lifetime of a building; landscape design in new developments, especially encouraging the use of trees; and Sustainable Urban Drainage Systems. It was also thought that people needed to be educated more about Sustainable Design and Construction.

20.4 Issues and Options 2, Key Issue 6.b asked what scale of new development should require a Code for Sustainable Homes (residential) or BREEAM (non-residential) assessment. The majority of respondents to this issue suggested that all development sites should be covered by environmental assessment methods such as BREEAM and Code for Sustainable Homes, and there should be clear sanctions if levels are not achieved.

Renewable Energy

20.5 Issues and Options 1 asked whether the Core Strategy should encourage all forms of renewable energy generation. A number of respondents to Issues and Options 2 also commented on the range of renewable energy types listed. Whilst most types were supported some questioned the suitability of different types and commented on appropriate scales. One respondent suggested that the River Ouse could be capable of some form hydroelectrical supply (possibly in the Foss basin) or ground source heat pumps (GSHPs), although the impact on the water quality should be assessed. Other respondents made comments on solar panels with one suggesting that photo voltaic would only become viable once the price reduces, whilst another felt that panels should be encouraged on every building even if it is listed. Some respondents suggested that York should not have any wind turbines, whilst
others suggested that small rooftop turbines would be appropriate. Another respondent commented that we could adopt biomass heating in schools using locally grown grains, although they noted that this may change the local landscape character of the land. It was also suggested that combined heat and power should be further encouraged through the Core Strategy.

20.6 In response to Issues and Options 1 some respondents suggested that we should be encouraging developments to meet 10% of their energy needs through generation on-site, although it was recommended that an alternative approach should be considered for buildings in conservation areas and listed buildings. Key Issue 6.c of Issues and Options 2 asked what scale of sites should be required to meet at least 10% of their energy needs through on-site renewable energy. None of the options received majority support although a number of respondents supported including an alternative approach for conservation areas and listed buildings. Some respondents stated that the test should be whether 10% would be viable, whilst others felt that it was unnecessary to have separate standards because it would be covered by BREEAM or the Code for Sustainable Homes. Other respondents suggested that the most appropriate renewable energy requirement was for 10% to be produced on-site up to 2012 rising to 15% by 2015 and 20% by 2020.

20.7 The Festival of Ideas questionnaire also asked whether we should pursue a 10% on-site renewable energy target. Most respondents (81%) thought we should set a more ambitious target and require more than 10% to be generated from renewable energy.

20.8 Key Issue 6.d looked at the impact of stand-alone renewable energy generators and asked whether the criteria set out should be used to assess the impact of proposed renewable energy schemes in York. Respondents generally agreed with the criteria but felt they should be more specific to York. Respondents suggested that the development of stand alone renewable energy generators should not compromise the openness of green belt or its primary purpose, nor the integrity of international and nationally designated areas and features or their settings. They should not be located in areas of flood risk nor where they would increase risk elsewhere. One respondent questioned the viability of the stand alone renewable energy schemes. Another respondent specifically identified the potential of the British Sugar Plant for renewable energy generation, giving the example of producing bio-ethanol.

Other Comments

20.9 Many respondents felt that the main priority should be to reduce consumption of energy, especially that used by businesses, homes and transport. Some talked about encouraging community based energy schemes and thus reducing York’s overall carbon footprint. It was considered that the priority in York should be to strive towards a ‘low carbon economy’ and some respondents felt that in places, the Core Strategy contradicted itself, for example when we are saying more jobs and homes yet we need to reduce consumption to become sustainable.
20.10 Respondents suggested that planning permission should be conditional on the adoption of an energy savings plan. It was also suggested that the Council should consider what a development costs, in terms of energy before it is granted planning permission.

21. Flood Risk

21.1 Flood risk was covered in both of the Issues and Options documents. In Issues and Options 1 it was covered within the spatial strategy, but it was covered in a separate chapter on flood risk in Issues and Options 2. The key issues centred around locating new development in areas at low risk of flooding and balancing flood risk and sustainability issues. The following sections outline the main issues raised in response to the Issues and Options for flood risk.

Key Issues and Options

21.2 Within Issues and Options 1, the question was asked whether flood risk (along with other factors) were correctly identified for consideration when determining the location of future development in York.

21.3 Respondents agreed that flood risk should be a factor in determining the location of future development. A number argued that no development or only minimal development should be allowed in floodplains. For example, 70% of respondents to the Festival of Ideas questionnaire think that we should only permit development in low flood risk areas. Comments outlined that the LDF should be informed by further detailed analysis of flood risk and that the spatial strategy should consider drainage infrastructure and flood defence systems.

21.4 Issues and Options 2 (Key Issue 14.a), specifically asked how the LDF should seek to balance flood risk and sustainability issues. Responses were evenly split between the two options presented (to prioritise sustainable locations and seek to mitigate potential flood risk or to only identify sites in non-high flood risk areas, regardless of site sustainability). Respondents considered that the Strategic Flood Risk Assessment (SFRA) should be used to inform the allocation of sites for new development, with the priority given to sites, which are not within the flood plain; although others argued that it should not be the sole driver for directing development within the city.

Other Comments

General

21.5 It was felt that the Core Strategy should better reflect the approach set out in PPS25 and the RSS Policy ENV1 in relation to managing flood risk. It should refer to avoiding risk to people and managing flood risk elsewhere. One respondent suggested that the policy approach should consider encouraging flooding in open space/wash areas to alleviate flooding in residential areas.
21.6 Respondents requested that we ensure we have adequate flood defences and drainage systems to prevent flooding and consider the potential issues faced with the effects of global warming. Finally, it was suggested that we work with the Environment Agency to address water management as a whole.

*Sequential / Exception Test*

21.7 Respondents felt that the Core Strategy should be clear that the ‘Sequential Test’ should be carried out before undertaking an ‘Exception Test’, so that developments are directed to the lowest areas of flood risk first. Some respondents did not agree with the flood zones suggested in the Strategic Flood Risk Assessment, specifically the ‘Exception Test’ for Zone 3a.

21.8 A number of respondents felt that flood risk and drainage were also related to environmental protection, which was covered in section 15 of Issues and Options 1. The main concern was that drainage issues were getting worse and that this had implications for flood risk.

### 22. Waste

22.1 Waste was considered in both of the Issues and Options documents. The Key Issues focused on meeting national, regional and local targets for waste, aiming to reduce waste production and setting out policies for the location of waste management facilities. The following section outlines the main issues raised in response to the Issues and Options for waste.

*Key Issues and Options*

22.2 Issues and Options 1, identified the importance of meeting waste targets as well as ensuring waste management is driven by the ‘Waste Hierarchy’. It identified a number of factors to inform our policy approach, including: maximising waste minimisation, reuse and recycling; providing sufficient waste sites; and identifying suitable locations for waste sites. Issues and Options 2, Key Issue 13.a built on this approach and asked in more detail about what should guide the location of new waste facilities in York. The options posed considered different factors (environmental, operational and transport) and how they should be used in identifying future waste sites.

*Waste Targets*

22.3 In relation to the waste targets identified in Issues and Options 1 all respondents that commented on this issue thought that local recycling targets should be stronger and should exceed government targets. It was also suggested by respondents that we should refer to specific waste targets for York.

*Waste Minimisation, Re-use and Recycling*

22.4 The reduction in waste generation was a key factor supported by respondents, with a number particularly emphasising the need for businesses to reduce packaging. One respondent questioned whether any lessons could
be learnt from Europe on reducing the generation of waste. Respondents supported recycling and indicated that small businesses and shops should be provided with recycling similar to households. Others suggested that improved recycling facilities should be made right across the city specifically improving facilities for flats and recycling facilities should be designed into new developments. They also argued that we should encourage separation of waste in the public waste bins in the city centre. Respondents suggested that the approach to waste should include seeking the reuse of buildings to avoid demolition and consequently reducing the amount of construction waste.

**Location of Waste Facilities**

22.5 Respondents to both consultations commented on the factors outlined in the documents which would influence the location of new facilities. In response to Key Issue 13.a of Issues and Options 2, option 1 (avoiding environmentally sensitive areas e.g. SSSI’s), option 2 (where environmental impact would be unacceptable e.g. noise, dust, litter) and option 5 (which would be guided by the type of waste being dealt with e.g. industrial or household) were the most favoured options. However, some respondents supported all the options and suggested all should influence future locations.

22.6 More generally, respondents felt that the following should be factors in determining the location of new waste management facilities:

- flood risk in accordance with PPS25;
- the impact of locating new waste facilities in the green belt;
- the reduction of vehicle trips and consideration of how waste would be transported;
- the results of any Environmental Impact Assessment, which should be carried out on any site considered;
- whether the site is previously developed land and close to existing facilities;
- consideration of the type of waste site proposed.

22.7 In addition respondents felt that the Core Strategy should encourage the development of existing waste plants rather than creating new ones. In relation to existing waste plants it was highlighted that the Core Strategy should explain the function of the Harewood Whin and Hessay waste sites and highlight their role both now and in the future.

**Other Comments**

**Waste Disposal Methods**

22.8 A number of respondents were against incineration and thought that other new technologies should be explored including small-scale MBT plants. Some though that incineration should be considered as an option given the possibility of recovering energy from the process, whilst others were cautious suggesting that the burning of waste needs to be carefully controlled. A number of respondents felt that York should aim towards treating all of its own waste within the authority area, either through landfill, recycling or reuse. Another respondent agreed stating that participation in long-term PFI contracts for dealing with York’s waste should be opposed.
Policy Comments

22.9 Respondents highlighted that LDF policy must relate to and conform to North Yorkshire County Council waste documents and the LDF strategy should reflect the approach to managing waste in the Waste Strategy for England 2007, PPS10 and RSS policies.

Phases of Waste Treatment

22.10 Some respondents requested that the Core Strategy was clearer about the different phases of waste treatment: generation; collection; and treatment and set out different policies for these different phases.

Detailed Comments

22.11 A number of respondents made detailed comments in both Issues and Options documents which related to issues outside the remit of the Core Strategy such as frequency of kerbside waste collections and packaging of products.

23. Minerals

23.1 Minerals were covered in both of the Issues and Options documents. The key issues centred around mineral extraction and reducing the consumption of non-renewable mineral resources. The following section outlines the main issues raised in response to the Issues and Options for minerals.

Key Issues and Options

23.2 Issues and Options 1 and Key Issue 13.b of Issues and Options 2 both asked about the circumstances under which we should permit the exploration, appraisal, winning and working of minerals within York. The level of response to the minerals section in Issues and Options 1 was low and no strong message emerged from respondents. A couple of respondents felt that permission for extraction should be allowed where there was a local need, rather than market demand, whilst another felt it should only be allowed when there was a national shortfall. In response to Issues and Options 2, extraction based on local demand and need was the favoured option, with priority given to supplying the local market. Other respondents emphasised that which ever option was taken forward control over extraction was vital and extraction should only be permitted where there will be minimal impact on the surrounding area, natural environment and local communities.

23.3 On a related issue, one respondent felt that we should actively reduce demand for non-renewable mineral resources by requiring all developments to maximise recycling of building waste and aggregates.
Other Comments

Policy Context

23.4 Respondents emphasised the need to reflect the policies and proposals of the North Yorkshire minerals documents and to take account of the second phase of the Sand and Gravel Study as it is developed.

Management and Restoration of Sites

23.5 One respondent to Issues and Options 1 argued that more substance was needed, particularly on the management of extraction sites. Respondents to both Issues and Options consultations also commented on site restoration. One argued that a re-instatement plan was needed to enhance the sites for the benefit of the public, whilst another said that the Core Strategy should acknowledge that flood storage could form part of redundant site restoration.

Location of Sites

23.6 It was highlighted by one respondent that the allocation of minerals sites should be informed by the Strategic Flood Risk Assessment (SFRA). Another respondent highlighted that the movement of minerals could potentially generate numerous vehicle trips, which could impact on the Strategic Road Network (SRN). In light of this it was suggested that facilities should be suitably located to reduce these trips.

24. Sustainability Appraisal

24.1 Only a few respondents commented specifically on the Sustainability Statements produced for each of the Issues and Options documents. The Statements form part of the overall Sustainability Appraisal (SA) for the Core Strategy.

Issues and Options 1

24.2 In terms of the first Sustainability Statement, for Issues and Options 1, some felt that it would be useful to identify actual or potential problems and conflicts such as the potential conflict between the continued economic growth of the City, with the safeguarding of the historic character of York. One respondent highlighted that reference was made to further work being required to identify alternative development strategy approaches and felt that the Council should commit to acting on this recommendation.

24.3 One respondent particularly highlighted the reference to the design of buildings in areas of flood risk. They felt that it should be made clear that development in areas of flood risk should be avoided in the first instance. Only when the sequential test has been applied should consideration to building in areas of flood risk and potential mitigation/flood proofing be considered.

24.4 Respondents strongly advised that the conservation and archaeological staff of the Council were closely involved throughout the preparation of the SA of the LDF. Requests were also made for more explicit recommendations to be included regarding the development of evidence.
24.5 Overall, some felt that the Sustainability Statement was a difficult document to understand.

**Issues and Options 2**

24.6 In terms of the Sustainability Statement for Issues and Options 2, respondents generally felt that the document was appropriate for this stage of the process.

**Approach**

24.7 The purpose of the introduction and approach were questioned. Respondents felt it would help to identify those options, which are likely to be unsustainable, and, therefore, should not go forward as Preferred Options (or at least, not without adequate mitigation).

**Environmental Capacity**

24.8 It was recommended that an environmental capacity study is undertaken before or at this stage of the SA process. The plan needs to consider the environmental capacity of York, as a whole, to accommodate growth, not simply the capacity of its villages and outer fringes.

**Housing and Employment Growth**

24.9 One respondent referred to the RSS Panel and how it made it clear that, in order to protect the environment of York, it may be necessary to de-couple housing numbers from jobs. They stated that if there has been no assessment of what capacity the environment has to accommodate future development, it is likely to be impossible to ascertain how far the divergence between housing provision and job provision might need to be in order to safeguard York's environment. Respondents felt that some assessment should be made as to the different levels of provision of housing, and what that would mean for the built and natural environment of the City.

**Green Belt**

24.7 An overall concern was raised regarding national Green Belt policy, and that the primary purpose of the York Green Belt had been misunderstood during the assessment process, and therefore as a result is unlikely to correctly identify the significant sustainability issues. They argued that the purpose of the York Green Belt is to safeguard the character and setting of the historic city, not to protect landscape quality, safeguard biodiversity, protect open space or prevent coalescence. The quality of the landscape around York and its biodiversity is only relevant insofar as it contributes to the Green Belt's primary purpose.

24.8 One respondent felt that the sustainability statement should reflect national policy guidance on Green Belts which states that a key element of Green Belts is their permanence and that their protection must continue "as far as can be seen ahead". They felt that the SA must recognise that it might not be possible to identify land for the continual expansion of York ad infinitum.

24.9 Some respondents felt that constraining development through tight Green Belt boundaries may well "constrain growth of a village or the city" but that is the
inevitable consequence of a Green Belt. It was felt that if Green Belt is to be used for development strict and unambiguous controls must be in place and real consultation must take place

24.10 Another respondent stated that it may well be that the definition of a Green Belt, which fulfils its primary purpose, is incompatible with the identification of sufficient land to meet the future housing and employment needs of York. This is one of the key sustainability issues the LDF will need to resolve.

Design & Construction

24.11 One respondent referred to PPS22 (Renewable Energy) which makes it clear that renewable energy equipment should not be installed where it would compromise the purposes behind protecting historic assets. This should be set out in the LDF.

Culture and Leisure

24.12 One respondent suggest that the role of leisure is not addressed at all. It was questioned whether the SA would actually identify the likely significant effects, which the LDF might have upon cultural heritage.

Waste & Minerals

24.13 It was suggested that waste incinerators must be located on brownfield and or industrial sites.

Habitats Regulations Assessment

24.14 Respondents stated that all land use plans are now subject to the requirements of the Habitats Directive. They highlighted that the earlier the Habitats Regulations Assessment process is begun, the more time and options there are for resolving issues, even possibly avoiding the need for an Appropriate Assessment altogether, or at least minimising its scope.
Appendix 1: List of those consulted on Core Strategy

Statutory Consultation Bodies:

- Deighton Parish Council
- Heworth Without Parish Council
- Department for Work & Pensions
- Department for Constitutional Affairs
- Department for Media, Culture & Sport
- Office of Government Commerce
- Hessay Parish Council
- Haxby Town Council
- Fulford Parish Council
- Elvington Parish Council
- British Telecom Group PLC
- Dunnington Parish Council
- Huntington Parish Council
- Copmanthorpe Parish Council
- Clifton Without Parish Council
- Bishopthorpe Parish Council
- Askham Richard Parish Council
- Askham Bryan Parish Council
- Acaster Malbis Parish Council
- Selby & York Primary Care Trust, now known as North Yorkshire and York Primary Care Trust.
- Heslington Parish Council
- English Heritage Yorkshire & The Humber Region
- British Gas East Yorkshire District (Consulted during I & O 1 only)
- Earswick Parish Council
- Rufforth Parish Council
- Yorkshire Water
- York Health Services NHS Acute Trust
- Tees, East & North Yorkshire Ambulance Service NHS Trust
- City of York Council
- York Consortium of Drainage Boards
- Network Rail London North Eastern
- Wigginton Parish Council
- Wheldrake Parish Council
- Upper Poppleton Parish Council
- Strensall & Towthorpe Parish Council
- Holtby Parish Council
- Skelton Parish Council
- Powegen Retail Ltd
- Rawcliffe Parish Council
- Nether Poppleton Parish Council
- Murton Parish Council
- Kexby Parish Council
- DEFRA
- Ministry of Defence (consulted during I & O1 only)
- D E Operations North (Catterick Office) (consulted during I & O 2 only)
- Home Office
- Department of Trade & Industry
- Transco Plc
- Naburn Parish Council
- Stockton on the Forest Parish Council
- Yorkshire & Humber Assembly
- Escrick Parish Council
- Thorganby Parish Council
- Murton Parish Council
- Colton Parish Council
- Shipton Parish Council
- Huby Parish Council
- North Yorkshire County Council
- East Riding of Yorkshire Council
- Selby District Council
Core Strategy Consultation Statement (2009)

- Harrogate Borough Council
- Hambleton District Council
- Acaster Selby & Appleton Roebuck Parish Council
- Yorkshire Forward
- Bilborough Parish Council
- Kyle & Upper Ouse Internal Drainage Board
- Appleton Roebuck & Copmanthorpe Internal Drainage Board
- Ouse & Derwent Internal Drainage Board
- Foss Internal Drainage Board
- Acaster Internal Drainage Board
- Marston Moor Internal Drainage Board
- Highways Agency
- Yorkshire Forward (York)
- Natural England North Yorkshire Team
- Environment Agency
- New Earswick Parish Council
- Osbaldwick Parish Council
- Ryedale District Council
- Government Office Yorkshire & Humber
- East Cottigwith Parish Council
- Countryside Agency now known as Natural England

General Consultation Bodies:
- York Science Park
- York Council for Voluntary Service
- Business Link York & North Yorkshire
- National Farmers Union
- Institute of Directors Yorkshire
- York Centre for Safer Communities
- York Racial Equality Network
- York-Heworth Congregation of Jehovah's Witnesses
- York Guild of Building
- Sutton upon Derwent Parish Council
- Overton Parish Council
- Newton on Derwent Parish Council
- Stillingfleet Parish Council
- Catton Parish Council
- Stamford Bridge Parish Council
- Gate Helmsley & Upper Helmsley Parish Council
- Warthill Parish Council
- Sheriff Hutton Parish Council
- Harton Parish Council
- Flaxton Parish Council
- Copmanthorpe Parish Council
- Long Marston Parish Council
- Moor Monkton Parish Council
- Lillings Ambo Parish Council
- Claxton & Sandhutton Parish Council
- Sutton-on-the-Forest Parish Council
- Science City York
- First Stop Tourism Partnership
  Now known as Visit York
- Churches Together in York
- Disabled Persons Advisory Group
- CBI
- Yorkshire Business Pride (City Centre Partnership)
- York & North Yorkshire Chamber of Commerce
- York Mosque
- British Chemical Distributors & Traders Association
- Help the Aged
Core Strategy Consultation Statement (2009)

- York England
- Commission for Racial Equality
- York Centre for Safer Communities
- Royal Institute of Chartered Surveyors
- CABE
- York Minster
- Patients Forum
- Forestry Commission
- Centre for Ecology & Hydrology (consulted during I & O 1 only)
- Disability Rights Commission
- Equal Opportunities Commission

Other Locally Identified Groups:

- York Conservation Trust
- Environment Forum
- York@Large
- Lifelong Learning Partnership
- Without Walls Board
- Raymond Barnes
- O'Neill Associates
- DTZ Debenham Thorpe
- Scaracroft Residents Association
- David Chapman Associates
- Crease Strickland Parkins
- Bramhall Blenkharn Ltd
- Hogg Builders (York) Ltd
- Home Builders Federation
- South Parade Society
- Barrett Homes Ltd (York Division) (consulted during I & O 1 only)
- Barrett Developments PLC (consulted during I & O 2 only)
- Tang Hall and Heworth Residents
- Shepherd Design Group
- Woodlands Residents Association
- York Diocesan Office
- Disabled Persons Transport Advisory Committee (consulted during I & O 1 only)
- British Geological Survey
- Community Rangers
- Housing Corporation
- English Partnerships
- York Hospitals NHS Trust
- Inclusive City
- Skelton Village Trust
- Farming & Wildlife Advisory Group
- Persimmon Homes (Yorkshire)
- York Residential Landlords Association
- Haxby & Wiggington Youth & Community Association
- Leeman Road Millennium Green Trust
- Joseph Rowntree Housing Trust
- University of York
- National Railway Museum
- York Museums Trust
- Federation of Small Businesses
- York Student Union
- Heslington East Community Forum
- Sandringham Residents Association
- Economic Development Unit
- Walmgate Community Association
- Wheatlands Community Woodland
- Heworth Planning Panel
- Yorkshire Rural Community Council
• Age Concern
• Joseph Rowntree Foundation
• Economic Development Board
• York District Sports Federation
• Passenger Transport Network
• National Federation of Bus Users
• Youth Forum
• York Tourism Bureau
• British Waterways Board (Naburn)
• York & District Citizens Advice Bureau
• Sustrans
• York & District Trade Council
• Healthy City Board
• Safer York Partnership
• Yorkshire Local Councils Association
• River Foss Society
• Micklegate Planning Panel
• York Homeless Forum
• Hull Road Planning Panel
• Community Regeneration York (consulted during I & O 1 only)
• Conservation Area Advisory Panel
• Friends of St Nicholas Fields
• Friends of the Earth (York and Ryedale)
• Fishergate Planning Panel
• Ramblers Association York Group
• Dringhouses and Woodthorpe Planning Panel
• River Ouse Action Group
• RSPB (York)
• York Access Group
• York Archaeological Forum
• York Archaeological Trust
• York Architectural and Archaeological Society
• York Civic Trust

• Greenpeace (York)
• York Environment Forum
• Nunnery Residents Association (consulted during I & O 1 only)
• York Practice Based Commissioning Group
• York St John College
• Older People's Assembly
• York Open Planning Forum
• Talkabout Panel
• Yorkshire Wildlife Trust
• Guildhall Planning Panel
• Mental Health Forum
• York Natural Environment Panel
• Heslington Village Trust
• York District Sports Federation
• CPRE (York and Selby District)
• York Property Forum
• North Yorkshire Police
• Acomb Planning Panel
• Clifton Planning Panel
• North Yorkshire Fire & Rescue Service
• Meadlands Residents Association
• Fulford Residents Association
• Greenwood Residents Association
• Grosvenor Residents Association
• The Groves Residents Association (consulted during I & O 1 only)
• Groves Neighborhood Association
• Kingsway West Residents Association
• Knapton Lane Residents Association
• York Cycle Campaign
• Lindsey Residents Association
• Dringhouses West Community Association
• Milligates Residents Association (consulted during I & O 1 only)
• Muncaster Residents Association
• Navigation Residents Association
• Nunnery Residents Association
• Park Grove Residents Association
• Poppleton Ward Residents Association
• St Georges Place Residents Association
• Leeman Road Community Association
• Cambridge Street Residents Association
• St Paul's Square Residents Association
• York Natural Environment Trust
• York Tomorrow
• Yorkshire Planning Aid
• Federation of Residents and Community Associations
• Acomb Green Residents Association
• Bell Farm Residents Association
• Foxwood Residents Association
• BAGNARA
• Dunnington Residents Association
• Carr Residents Association
• Chapelfields Residents Association
• Clementhorpe Community Association
• Clifton Residents Association
• Copmanthorpe Residents Association
• Cornlands Residents Association
• Dodsworth Area Residents Association
• York Georgian Society
• Bishophill Action Group
• York Ornithological Club
• North Yorkshire Forum for Voluntary Organisations
• Gypsy & Traveler Law Reform Coalition (consulted during I & O 1 only)
• Friend’s, Families and Travellers (consulted during I & O 2 only)
• York TV
• GNER
• BBC Radio York
• North Yorkshire Learning & Skills Council
• Planning Sub-Committee of Huntington Parish Council (consulted during I & O 1 only)
• York People First 2000
• Sport England
• Yorkshire Naturalists Union
• Active York
• York Practice Based Commissioning Group (consulted during I & O 1 only)
• York College - Further & Higher Education
• RTPI Yorkshire
• RIBA Yorkshire
• Yorkshire MESMAC
• National Centre of Early Music
• York Traveller’s Trust
• Holgate Planning Panel (consulted during I & O 1 only)
• Energy Efficiency Advice Centre
• York Blind and Partially Sighted Society
• Older People’s Assembly
• Bootham Planning Panel (consulted during I & O 1 only)
• Walmgate Planning Panel (consulted during I & O 1 only)
• Campaign for Real Ale
• Bishophill Planning Panel (consulted during I & O 1 only)
• Beckfield Planning Panel (consulted during I & O 1 only)
• Knavesmire Planning Panel (consulted during I & O 1 only)
• Westfield Planning Panel (consulted during I & O 1 only)
• Connexions
• The Coal Authority
• The Gypsy Council
• Include Us In - York Council for Voluntary Service
• Higher York Joint Student Union
• The College of Law
• Health & Safety Executive
• Askham Grange
• Civil Aviation Authority
• Freight Transport Association
• Road Haulage Association
• The Crown Estate Office
• National Playing Fields Associations
• Royal Mail Property Holdings / Group Property
• Monks Cross Shopping Centre
• Trusties for Monks Cross Shopping Centre (consulted during I & O 2 only)
• Askham Bryan College
• York & Selby Carers Centre
• Learning Difficulties Forum
• Transport 2000
• McArthur Glen Designer Outlet
• Boots plc
• Marks & Spencer plc
• Theatre Royal
• Shelter
• Mulberry Hall
• Yorkshire MESMAC
• National Trust
• Institute of Citizenship
• First York
• Land Securities Properties Ltd
• York Racecourse Committee
• Purey Cust Nuffield Hospital
• Stockholm Environment Institute
• Yorkshire Housing
• Garden History Society
• Society for the Preservation of Ancient Buildings
• 20th Century Society
• York Coalition of Disabled People
• Norwich Union Life
• Tuke Housing Association
• Family Housing Association (York) Ltd
• Lions Club
• York Ainsty Rotary Club
• St Sampson's Centre
• Spurriergate Centre
• Newsquest (York) Ltd
• Nestle Rowntree Division
• York Air Museum
• Adams Hydraulics Ltd
• Playing Fields Association (York & North Yorkshire)
• Future Prospects
• Ancient Monuments Society
• Job Centre Plus
• Older Citizens Advocacy York
• Council for British Archaeology
• The Georgian Group
• Victorian Society
• York Women's Aid

Additional Groups / Organisations:
• United Co-operatives Ltd
• The Barton Willmore Planning Partnership Anglia
• Indigo Planning
• Places for People
• Barton Willmore
• York City Centre Churches
• Carter Jonas LLP
• T H Hobson Ltd (consulted during I & O 1 only)
• George Wimpey North Yorkshire Ltd
• Stewart Ross Associates
• Drivers Jonas (consulted during I & O 1 only)
• Terence O'Rourke
• Rapleys
• Tribal MJP
• Action Access A1079
• Geraldve
• York Housing Association Ltd
• York Carers Together
• Oakgate Group Plc
• York and District Trade Union Council
• Knight Frank
• Tesco Stores Limited
• O’Neil, Beechey, O’Neil Architects
• The Retreat Ltd
• Conservation Areas Advisory Panel
• npower Renewables
• WM Morrison Supermarkets PLC
• King Sturge
• GVA Grimley LLP
• Vangarde
• Colliers CRE
• York Central Landowners Group
• York Green Party
• Clifton Moor Business Association
• Bovis Homes Ltd
• A J M Regeneration Ltd
• White Young Green Planning
• Walton & Co
• NorthCountry Homes Group Ltd
• Plot of Gold Ltd
• The British Wind Energy Association
• The Showmen’s Guild of Great Britain
• Storeys:ssp Ltd
• Shirethorn Ltd
• George Wimpey Strategic Land
• Countryside Properties (Northern) Ltd
• The Theatres Trust
• Minster’s Rail Campaign
• England & Lyle
• Smiths Gore
• The Inland Waterways Association
• Ouse-Ure Corridor Section
• Paul & Company
• Hallam Land Management Ltd
• Local Dialogue LLP
• Northern Planning
• T H Hobson Ltd
• W A Fairhurst & Partners
• I D Planning
• Faber Maunsell
• McCarthy & Stone Ltd
• The Land & Development Practice
• King Sturge LLP
• York Hospitality Association
- The Helmsley Group Ltd
- Spawforth Associates
- The Development Planning Partnership
- Home Housing Association
- National Grid (consulted during I & O 2 only)
- Taylor Wimpy PLC (consulted during I & O 2 only)
- Asda Stores Ltd (consulted during I & O 2 only)
- York Minstermen (consulted during I & O 2 only)
- Planning Prospects Ltd (consulted during I & O 2 only)
- Blackett, Hart & Pratt LLP (consulted during I & O 2 only)
- Wilton Developments Ltd (consulted during I & O 2 only)
- WR Dunn & Co. Ltd (consulted during I & O 2 only)
- Commercial Estates Group (consulted during I & O 2 only)
- UK Coal Mining Ltd (consulted during I & O 2 only)
- Cadbury Trebor Bassett Ltd (consulted during I & O 2 only)
- York Residents Against Incineration (consulted during I & O 2 only)
- Land securities PLC (consulted during I & O 2 only)
- P&O Estates Shepherd Homes Ltd (consulted during I & O 2 only)
- Church Commissioners for England (consulted during I & O 2 only)
- Associated British Foods Plc (consulted during I & O 2 only)
- 3Ps People Promoting Participation (consulted during I & O 2 only)
- North Minster Properties Ltd (consulted during I & O 2 only)
- Redrow Homes (Yorkshire) Ltd (consulted during I & O 2 only)
- Landmatch Ltd (consulted during I & O 2 only)
- The Castle Area Campaign Group (consulted during I & O 2 only)
- The Wilberforce Trust (consulted during I & O 2 only)
- Opus Land Ltd (consulted during I & O 2 only)
- Trustees of Mrs G M Ward Trust (consulted during I & O 2 only)
- GHT Developments Ltd (consulted during I & O 2 only)
- Melrose PLC (consulted during I & O 2 only)
- National Offender Management service
- Miller Homes Ltd
- Wimpey Homes
- Constructive Individuals
- RSPB Northern England Region
- Chris Thomas Ltd Outdoor Advertising Consultants
- Cass Associates
- York Professional Initiative
- Pre-School Learning Alliance
- Tower Estates (York) Ltd
- The War Memorial Trust
- The North Yorkshire County Branch of the Royal British Legion
- Gordons LLP
- Artisreal UK (Consultants)
- The Woodland Trust
- Beck Developments
- Cygnet Planning
- Carers Together
- Lives Unlimited
- LHL Architects
• Costco Wholesale UK Ltd
• Loxley Homes
• York and North Yorkshire partnership unit
• LXB Properties Ltd
• CgMs
• Erinaceous
• Cunnane Town Planning LLP
• Fusion Online
• Dales Planning Services

• Portfor Homes Ltd
• Andrew Martin Associates
• FRD Ltd

• Also consulted were 52 individuals who had requested to be included on the LDF database during the Issues and Options 1 consultation, and 108 during Issues and Options 2. There were also a number of MPs and MEPs who requested to be consulted.
York will inevitably change in the future, as it has in the past. But what sort of place do we want it to be? For many people, York is already a great place to live. Our city’s assets are so obvious they hardly need to be spelt out, but is enough being done to make the best use of them, for everyone’s benefit?

In 2003, as part of a ‘Festival of Ideas’, we asked you about the kind of York you wanted to see in the future. Given recent changes in the city and new issues which have arisen, we are asking you once again to join in the discussion about York’s future through the Festival of Ideas 2. Your views will be used to inform the review of our Community Strategy and the production of our Local Development Framework’s Core Strategy (which will replace the Local Plan).

**Have your say**

We want everyone to have their say. We want to hear your views about the issues we need to tackle, the strengths we need to build on and the special qualities of York we need to protect and enhance. It is only through planning together that we will improve quality of life and build stronger, more sustainable communities for this and future generations. This leaflet outlines some of the key issues which we will be considering as part of the Festival and then asks some specific questions to help determine how we should approach some of these issues.

Please fill in the questions on this survey and return it to us at the freepost address by 31 October 2007. Alternatively, you can take part in the survey online by visiting www.york.gov.uk/consultation.

**Want to know more?**

The Festival runs from 17 September to 31 October and includes a wide range of opportunities to contribute views on York’s future, including a city conference, which will be held on 16 October at the Park Inn Hotel, and public exhibitions across the city. In addition, a document has been produced specifically on the Core Strategy, which looks at these and other issues in more detail. This document is available either online at the address given below, or by contacting the City Development Team on the number below.

For the full Festival of Ideas 2 programme or copies of the consultation documents look on the council’s website www.york.gov.uk/environment/FestivalofIdeas2/ or contact the City Development Team on (01904) 551466 or by email at citydevelopment@york.gov.uk

**Prize Draw to win £50 of vouchers for a shop of your choice**
Have your say on York’s future

What makes a community a good place to live and work?

York is many different things to different people, whether you live here, work here or visit as a tourist. However, successful communities have many things in common:

- decent homes at prices people can afford
- clean, safe, green environments
- access to jobs and training
- they limit their impact on the environment
- excellent services - schools, health services, shops and banks
- people have a say in the way their community is run.

York is currently faced with huge opportunities that will determine its future as it continues to grow over the next two decades. With a healthy economy and low unemployment, the city compares well when measured against other British cities. However, in order to remain competitive and improve quality of life for all, York will need to deal with challenges such as traffic congestion, rising house prices and providing training opportunities for job seekers to help address skills shortages. The council is also committed to reducing York’s eco-footprint to help tackle climate change. We need to ensure that York meets its needs in a way that does not compromise the city’s special character.

Your responses to the questions we ask in the rest of this leaflet will inform the approach we take to ensure that York and its different neighbourhoods and communities continue to be good places to live and work.

Living and working in York

The population of York is expected to continue to increase over the next 15 years because of York’s economic success and changes in the character of households, such as the increase in the number of single person households, in part reflecting the fact that people are living longer. All these new households will need homes. The city has a number of outlying villages with populations ranging from around 1,250 to less than 100 - while focusing the majority of development on York we have to think about which villages would benefit from or need new development. York and its villages are shown on the map.
Where should we focus new development?

In the future we will need extra land for both homes and businesses. Wherever possible we will make previously developed or brownfield land our priority before looking at greenfield sites. Where do you think new development should be concentrated?

☐ In York itself (the city centre, the adjoining suburbs and ‘villages’ now part of the urban area - coloured yellow on the map)

☐ In York (coloured yellow on the map) and outlying villages beyond the urban area (coloured red on the map). If you think any particular villages should be considered please let us know why.

☐ Other (for example a new settlement). Please specify ________________________________

How many homes should we build?

The number of houses which the council is required to provide in York will be set through the Regional Plan for Yorkshire and the Humber. However, this number has not yet been formally set. The proposed housing target for York is around 630 new homes per year. This is lower than the rate of building which has taken place over the past five years, which has been an average of around 880 units a year. It is worth noting that the Local Plan requirement was 675 new homes a year. National household projections predict that York will need to accommodate 730 new homes a year and a recent study carried out by the council into overall demand for housing in York identified a requirement for an additional 982 homes a year.
Building 630 new homes per year:

**Advantages:**
- Would help reduce pressure to build on greenfield land, as less land would be required
- Less pressure on York’s existing roads and other infrastructure

**Disadvantages:**
- Would not provide for all the demand for housing in York including the need for affordable housing
- A lack of housing choice could undermine York’s economic growth
- Lead to more people commuting into the city, and higher greenhouse gas emissions from traffic, particularly if York’s economy expands

The annual need for affordable housing in York is much greater than even the current building rate of 880 homes per year - we would have to build around 1218 affordable houses each year to provide for everyone’s needs. We currently negotiate with developers to provide up to half of all new housing developments as low cost affordable homes. While building more houses gives us more opportunities to negotiate more affordable housing, it’s clear that planning policy alone cannot solve York’s affordable housing shortage, but it can make a significant contribution. We can also influence the types of homes which are built, to provide more family homes rather than flats. However, building more homes and at lower densities could put more pressure on undeveloped ‘greenfield’ land.

Q2
On balance, which level of housing growth do you support?
- Less than 630 homes per year
- 630 homes per year (three-quarters of current rate)
- 880 homes per year (current rate)
- More than 880 homes per year
- Other (please state)

Q3
What should be our approach to affordable housing?
Many households spend around half their income on rent or mortgage payments. The council’s current policy requires developers to build up to half of developments as affordable homes. This applies to developments of 15 or more homes in the city, the adjoining suburbs/villages now part of the urban area and the larger villages of Haxby, Wigginton and Strensall and on two or more homes built in all other outlying villages. Do you agree with this policy?
- Yes
- I don’t know
- No - Do you think more or less affordable homes should be built?

Q4
What type of businesses should we support?
In the past York’s economy has been dominated by the railways and large confectionery manufacturers. However, York has recently experienced growth in the hi-technology sector, including information and heritage based technologies, bioscience and healthcare (often referred to as Science City York) and professional and financial services.

The economy is changing towards more hi-tech, tourism and office based jobs. How important do you think it is for the council to support the growth of the businesses listed below? For each business type please rate on a scale of 1 to 5.

<table>
<thead>
<tr>
<th>Business Type</th>
<th>Not important</th>
<th>Very important</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hospitality &amp; tourism</td>
<td>1</td>
<td>5</td>
</tr>
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<tr>
<td>Construction &amp; transport</td>
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Should housing growth match employment growth?

Thinking about where people live and work is important in trying to reduce congestion and protect the environment. Around 22,500 people travel into York to work, and 17,000 people travel from York to work elsewhere - typical of an economically successful city. Work for the Local Development Framework (LDF) suggests that, given the success of initiatives such as Science City York (hi-tech businesses) up to 1060 additional jobs could be created each year in York. If the amount of new housing does not broadly match the growth in the number of people employed in York then the number of people travelling into York for work could increase significantly, needing extra investment in public transport to limit the impact (eg park and ride, new bus links and improved rail connections).

Q5

What approach do you think we should take towards planning for future housing and employment?

- Enough housing should be provided in York to meet the needs of any additional employees
- Some of this housing should be provided in surrounding areas outside York's boundary

City centre

Over the centuries York has changed significantly, but it has also preserved the physical evidence of its history. Around four million visitors each year are drawn to enjoy the city's special character and its various world-class visitor attractions, museums, shops and galleries. Even so, work for the council has highlighted the need to increase the range of shops, including a new city centre department store and more purpose-built retail units.

Q6

Do you think we should build more shops and increase leisure attractions, such as cinemas, live music venues, or museums, in the city centre?

- More Shops
  - yes
  - no
  - please specify

- Leisure attractions
  - yes
  - no
  - please specify

Our changing climate

How should we approach development in flood risk areas?

We're already seeing the effects of global warming with climate change causing more freak weather disturbances. Almost 20% of York's carbon emissions come from how we heat, light and run our homes, and around 10% come from transport. The location and design of new buildings need to be part of a solution to climate change, not part of the problem. Flood risk is an important issue for York - any future approach to this issue must take full account of the risks to life and property. At the same time many of York's existing built-up areas have some potential risk of flooding and it may be necessary to allow suitable redevelopment within these areas, particularly where locations have good access to or are a focus for public transport and shops and other services (such as the city centre). In this case they would need protection from flooding using flood defence measures such as barriers.

Q7

How should we approach development in high flood risk areas?

- Allow some development in high flood risk areas within the existing urban area, if there is an existing focus for public transport, shops and other services, and flood protection measures are provided
- Only build in areas with low flood risk.

How much renewable energy should major new developments provide?

Regional policy proposes that 10% of energy in large new developments should come from renewable sources, such as wind turbines or solar panels on buildings. This may result in initial increases to the cost of new buildings. Regional policy also highlights the need to consider large-scale renewable energy generation and this may require finding sites in the open countryside.

Have your say on York's future
Q8  Do you think that York should set a more ambitious target than 10% for the proportion of its energy which is generated from renewable energy schemes?

☐ Yes  ☐ No  ☐ Don’t know

Getting around

How should we tackle congestion?

Road traffic has considerable environmental effects, both contributing to climate change and damaging air quality. Congestion can also have an adverse effect on the local economy by lengthening journey times. York is a relatively compact city that lends itself to walking, cycling and public transport use. Nevertheless given its wider tourism and economic role it also draws people in from a wide area, many of whom travel into York by car and rail.

Q9  In your opinion, which are the best ways of reducing congestion in York? Please rank from 1-3, with 1 being the most important.

Rank from 1 to 3

☐ Locating new development near public transport, shops and other services to encourage people to use cars less
☐ Promoting the use of alternative forms of travel to the private car such as extending the cycling and walking routes and extending the Park and Ride service
☐ Increasing the capacity of the road network by dualling the outer ring road or improving junctions on it.

York’s historic and natural environment

How can we improve open space provision in York?

York includes open spaces ranging from small play spaces and sports fields to the strays and river corridors that stretch from the open countryside to the heart of the city. It also has a Green Belt which covers much of the open countryside around York, giving the city an attractive setting. These open spaces also provide important habitats for wildlife. There are a number of different factors which we can consider when thinking about how we can improve open space provision in York, such as the amount of, the quality of and access to open space.

Q10  Which of the following do you think it is most important to improve (please tick one)?

☐ The amount of open space in York
☐ The quality of open space in York (for example improving cleanliness, maintenance, safety and greenery)
☐ The accessibility of open space to people’s homes and places of work.

How do we protect the historic parts of the York area?

It is important that the unique character of York’s historic centre and open spaces is not affected by new development. As with the Local Plan, the LDF will include policies to protect listed buildings, conservation areas and other features of national importance, such as areas of archaeological importance or parks and gardens (eg Museum Gardens). We therefore already have clear policies on York’s historic centre; however, significant parts of the city are not covered by these policies and will also need appropriate protection of what makes them special.

Q11  Do you think we should do more to understand what is special about the character of suburban areas or villages which don’t have this sort of national protection, such as by producing specific design guidelines for villages or a ‘Local List’ of important buildings?

☐ Yes  ☐ No  ☐ Don’t know
Difficult Choices
Deciding how we progress as a city will involve making difficult choices as we need to balance environmental concerns with the growth of the city.

Q12
The following issues have been identified as priorities to focus on for the future of York. Which ones do you think should be our top three priorities?  (Please tick three only)
- Building strong, safe and healthy communities
- Developing the economy, jobs and skills
- Ensuring the city’s housing and social needs are met (eg community and youth centres)
- Improving the city’s physical, cultural and leisure facilities - for instance, by building more shops, live music venues and tourist attractions
- Improving travel within, to and from York
- Reducing our impact on the environment - for instance, by improving energy efficiency of new buildings, improving air quality, supporting nature / conservation sites, increasing the amount of green spaces and outdoor sports facilities.

Q13
Are there any other priorities the council should address?

Have your say on York’s future

If you wish to receive further information about the Local Development Framework in the future, please tick this box

Thank you for giving your views. Please fold this sheet as shown and return by 31 October 2007
Tuck flap A in here.

If you would like this information in an accessible format (for example in large print, on tape or by email) or another language please telephone:
(01904) 551 466 or email: citydevelopment@york.gov.uk

City Development,
City Strategy,
City of York Council,
FREEPOST (YO239),
York
YO1 7ZZ

For free entry into the prize draw, please complete the address panel below:

Name
Address
Postcode
Email (optional)
Tel (optional)
## Appendix 3: Consultation Work Programmes

### Issues and Options 1:

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