

CITY OF YORK LOCAL PLAN

City of York Local Plan
Consultation Statement
Regulation 22(c) of the Town & Country
Planning (Local Planning) (England)
Regulations 2012 (as amended)
May 2018

City of York Local Plan Consultation Statement Regulation 22(c) of the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended)

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City of York Local Plan Consultation Statement Regulation 22(c) of the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended)

1.0 Introduction

Legislative background

- 1.1 This Statement of Consultation has been prepared in accordance with Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Its purpose is to show how we have met the legal requirements for consultation.
- 1.2 Regulation 22 (1) (c) requires a statement setting out:
- i) which bodies and persons the local planning authority invited to make representations under regulation 18;
 - ii) how those bodies and persons were invited to make representations under regulation 18;
 - iii) a summary of the main issues raised by the representations made pursuant to regulation 18;
 - iv) how any of those representations made pursuant to regulation 18 have been taken into account;
 - (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
 - (vi) if no representations were made in regulation 20, that no such representations were made.
- 1.3 During the course of preparing the LDF Core Strategy and now the Local Plan, the relevant Regulations, originally published in 2004 were updated in 2008 and 2009. In April 2012 a set of Regulations were issued which replace all previous versions in their entirety. Whilst the requirement to produce a Consultation Statement is not new, the specific regulations, which refer to it, have changed. The Regulations refer to the entire process of preparing Development Plan Documents (DPDs) such as the Local Plan. Work undertaken under previous Regulations is still valid albeit that the specific Regulation (including number) may have changed. Under previous regulations most of the work in preparing the Local Plan/Core Strategy was referred to as Regulation 25. In the 2012 Regulations the equivalent stage is referred to as Regulation 18. In addition new Regulations came into force on 15th January 2018, these

removed paragraph 2 of Regulation 22 "(2) Notwithstanding regulation 3(1), each of the documents referred to in paragraph (1) must be sent in paper form and a copy sent electronically."

2.0 Statement of Community Involvement and Database

Statement of Community Involvement

2.1 The Statement of Community Involvement (SCI) sets out how the Council intends to achieve continuous community involvement in the preparation of all planning documents. The Council's SCI acts to guide consultation on planning documents and sets the scene on how efficient and effective consultation can be achieved. Following three stages of consultation and independent examination, the City of York's SCI was adopted in December 2007.

Database

2.2 The SCI sets out at paragraph 5.1 information regarding the Councils Database. The Council has compiled a database to include the individuals and organisations who have registered an interest in the York Local Development Framework (LDF)/ Local Plan process. This is not a fixed list and further contacts will be added as they are identified, whilst others may no longer wish to be involved and will be removed from the database on request.

3.0 Development of the Local Plan

3.1 The development of the City of York Local Plan reflects work which began in 2005 when the Council commenced the preparation of its Local Development Framework (LDF) Core Strategy. This has included engagement, assessment and the development of a substantial body of evidence. Consultations were undertaken at the following key stages:

- LDF Core Strategy Issues and Options 1 (2006);
- LDF Core Strategy Issue and Option 2 (2007);
- LDF Core Strategy Preferred Options (2009);
- LDF Core Strategy Submission (Publication) (2011);
- Local Plan Preferred Options (2013);
- Local Plan Further Sites (2014);
- Local Plan Preferred Sites (2016);

- Local Plan Pre Publication (2017);
- Local Plan Publication (February 2018).

3.2 This document is set out in sections based on the above key consultation stages. Each section identifies where information can be found on the consultation documents produced, who was consulted, how we consulted, the various methods used and a summary of the responses received. All of the consultations referred to in this statement were carried out in compliance with the Council's adopted Statement of Community Involvement.

3.3 In line with the regulations this statement also needs to set out how comments and representations made have been taken into account during the Local Plan drafting stage (Regulation 18). Several documents have set this out including The *City of York Local Plan Sustainability Appraisal, Appendix K– Policy and Site Audit Trail (February 2018)* which is Annex 1 to this report. This includes an audit trail of the development of policy and sites within the Local Plan, including views received through consultation starting from the LDF Core Strategy to the Pre-Publication Local Plan (2017). This was undertaken as part of the Sustainability Appraisal process but is still of relevance in relation to the audit of policies and sites.

3.4 In addition a schedule of non employment and housing sites/growth related policies modifications to York's Local Plan since the Preferred Options Local Plan in 2013 and officer assessments of housing, employment and other sites since Preferred Sites Consultation (2016) are set out in part of the Council's Executive Report from 13th July 2017 including the Council minutes are set out in Annex 2 of this report. This helps to show the evolution of policies and sites in York's Local Plan.

3.5 The changes made between the Pre-Publication and Publication Local Plan for policies and sites are set out as part of the Council's Executive Report in Annex A from 25th January 2018 and the associated Council minutes show the audit trail of Council Members decisions on the proposed changes, please refer to Annex 3 of this report. More information on how comments have been taken into account can also be found in Section 7 of this report.

4.0 LDF Core Strategy

LDF Core Strategy Issues and Options 1 and 2

- 4.1 The first step in preparing the LDF Core Strategy was to consider the key issues and options facing York. To aid the discussion of the issues and options an initial document was produced called the *Core Strategy Issues and Options (2006)* which outlined some of the key issues facing York and possible options for addressing these documents. 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 the *Core Strategy Issues and Options 2 (2007)* document 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'.
- 4.2 The LDF Issues and Options consultation for the Core Strategy took place for 7 weeks between June-July 2006 (Issues and Options 1) and 6 weeks between September-October 2007 (Issues and Options 2). The Consultation Statement *LDF Issues and Options Consultation Summer 2006 (July 2007)* summarises consultation on Issues and Options 1 and was prepared to support consultation on Issues and Options 2. Please refer to Annex 4 of this report. Whilst the Statement stands alone the information it includes was also included in the Issues and Options 2 statement. The *Core Strategy Consultation Statement (July 2009)* summarised consultation on Issues and Options 1 and 2 and was prepared to support consultation on Preferred Options. Please refer to Annex 5 of this report.
- 4.3 Annex 4 and Annex 5 of this report set out in detail the consultation documents produced, who was consulted, how we consulted; the various methods used, and provide a summary of the responses received. For the purpose of this report, a summary is also provided below.
- 4.4 A list of the people consulted on the LDF Core Strategy Issues and Options 1 and 2 can be found in Appendix 1 of Annex 5 to this report. The Issues and Options consultations involved a mail out, internet content, media coverage, consultation events, workshops, forums and attendance at ward committees, interest group and specific consultee meetings and information was also made available at Council offices. A questionnaire was also circulated as part of the consultation on Issues and Options 2. A total of 932 separate responses were received as a

result of the consultation on Issues and Options 1 from 124 respondents. The Council received 1560 responses to the Issues and Options 2 consultation from 78 respondents and 2330 people responded to the Festival of Ideas 2 questionnaire as part of Issues and Options 2.

LDF Core Strategy Preferred Options

- 4.5 The Preferred Options stage of the Core Strategy followed on from the Issues and Options stages. The *Core Strategy Preferred Options (2009)* document draws from the responses that were received during the previous consultation events as well as feeding in the evidence base findings and higher level policy such as national and regional planning policy.
- 4.6 The LDF Preferred Options consultation was undertaken for the Core Strategy for 11 weeks between June-August 2009. The *Core Strategy Preferred Options Consultation Statement & Schedule of Responses (February 2011)* included a summary of the consultation to support the Core Strategy Submission Draft document. Please refer to Annex 6 of this report which sets out the consultation documents produced, who was consulted, how we consulted, the various methods used, and provides a summary of the responses received. For the purpose of this report, a summary is also provided below.
- 4.7 A list of all those consulted on the LDF Core Strategy Preferred Options is provided in Annex 1 of Annex 6 to this report. The Preferred Options consultation involved a mail out, questionnaire, internet content, media coverage, consultation events, workshops, forums and attendance at ward, interest group and specific consultee meetings, and information being made available at Council offices. Over 2,250 'Planning York's Future' questionnaires were returned to the Council and a total of 1249 separate comments on the Core Strategy document were received as a result of the consultation from 117 respondents. In addition over 160 people gave their views by attending one of the consultation workshops.
- 4.8 A Statement in accordance with Regulation 30(d) of The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008, was produced in September 2011/amended 2012 (*Core Strategy Submission (Publication) Consultation Statement Regulation 30 (1) (d) Statement (September 2011/amended 2012)*). Please refer to Annex 7 of this report. This document set out which bodies and persons the local planning authority invited to make

representations as part of the Issues and Options and Preferred Options consultations (Regulation 25); how those bodies and persons were invited to make representations; a summary of the main issues raised by the representations made; and how any representations made have been taken into account. The Statement follows on from, and should be read alongside, the Consultation Statements published for the Core Strategy Issues and Options and Preferred Options consultations above.

LDF Core Strategy Submission (Publication)

4.9 The *Core Strategy Submission (Publication) (2011)* followed on from previous rounds of consultation and draws from the responses received, as well as feeding in the evidence base findings and higher level policy such as national planning policy. It was consulted on over 6 weeks between September-November 2011. A Statement in accordance with Regulation 30(e) of *The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008*, was produced in January 2012 (*Core Strategy Consultation Statement Regulation 30 (1) (e) (January 2012)*). This document provides the number of duly made representations received on the Submission (Publication) Core Strategy, and the main issues raised by the representations received. Please refer to Annex 8 of this report. For the purpose of this report, a summary is also provided below.

4.10 During the representation period a total of 1385 representations were received from 141 organisations and individuals. The Submission (Publication) consultation involved a mail out, questionnaire, internet content, media coverage, consultation events, workshops, forums and attendance at ward, interest group and specific consultee meetings, and information being made available at Council offices.

LDF Core Strategy Submission

4.11 The LDF Core Strategy was submitted to the Secretary of State on 14th February 2012, just before the new NPPF was issued. Following an exploratory meeting with the Inspector on 23rd April 2012 the Director of City and Environmental Services wrote to the Inspector on 28th May 2012 to inform him of the decision to reluctantly recommend to Council the withdrawal of the City of York Council's Core Strategy. This course of action was approved by the City of York Council on 12th July 2012 and the City of York Core Strategy Examination was ceased. The key reasons were:

- the LDF was overtaken by publication of the NPPF;
- moving to a Local Plan would include site allocations, critical to supporting and delivering growth;
- considering allocations would enable a clearer and practical focus on viability and deliverability; and
- the approval of the Community Stadium required the reviewing of the retail evidence base/city centre policies.

4.12 Reflecting the Government's views of plan making and the movement away from a folder of development plan documents to a single plan, in October 2012 Cabinet instructed Officers to begin work on an NPPF compliant Local Plan for York.

5.0 Production of the City of York Local Plan

Local Plan Preferred Options

- 5.1 The production of a Local Plan allowed for the creation of a planning strategy that responded to relevant contemporary issues facing York. In Autumn 2012 a comprehensive 6 week 'Call for Sites' was carried out, asking developers, landowners, agents and the public to submit land which they thought had potential for development over the next 15-20 years. These sites form the basis of the site selection process for the Local Plan. The press coverage for the consultation included a *Your Voice*, Autumn 2012, Article – *Planning York's Future*: This publication was distributed to all York residents. The article highlighted the Council's website as a place to find out more. In addition there was a *Yorkshire Post*, 7 November 2012, Article – *Pioneering Research to Shape Historic City's Economic Future*. The *Yorkshire Post* is read by approximately 193,000 people. The article highlighted that the Council "is now embarking on wide-ranging research to provide the evidence needed to develop an economic and retail vision to underpin the city's new development brief after initial proposals had to be shelved due to concerns over their viability". There were nearly 300 individual site submissions during the consultation period to be considered for a range of development purposes.
- 5.2 In addition as part of the initial process of developing the Local Plan, a series of workshops were held to establish key issues within York to help write the Vision. These workshops took place between October and November 2012. The themes of the workshops were in keeping with the

Council Plan Themes. The Protect Vulnerable People theme was covered in all workshops, as was Sustainability. The workshops included:

- Create Jobs and Grow the Economy – Held at The Mansion House on 5th November 2012 and chaired by Andrew Follington, Area Commercial Director North Yorkshire of HSBC.
- Get York Moving – Held at The King’s Manor on 25th October 2012 and chaired by Nigel Foster, Director for Fore Consulting.
- Build Strong Communities – Held at The King’s Manor on 6th November 2012 and chaired by John Hocking, Executive Director of the Joseph Rowntree Housing Trust.
- Protect the Environment – Held at The King’s Manor on 23rd October 2012 and chaired by Mike Childs, Head of Policy, Research and Science at Friends of the Earth.

5.3 The Local Plan Preferred Options document (June 2013) draws from the responses that were received during earlier consultations on the LDF Core Strategy, Call for Sites, Visioning Workshops and other LDF documents. The City of York Local Plan Preferred Options – Consultation Audit Trail (May 2013) which is Annex 9 of this Report provides an audit trail that describes how the Council has undertaken community participation and stakeholder involvement to produce the Local Plan Preferred Options. A Local Plan Preferred Options Consultation Statement (2015) was also prepared and sets out in detail the consultation documents, who was invited to make the representations, how people were invited to make the representations, the number of responses received, details on the petitions received and the main issues raised. This can be found in Annex 10 to this report. For the purpose of this report, a summary is also provided below. The Annexes to Annex 10 also gives a copy of comments form and site submission form, a copy of the letter to consultees, a copy of the leaflet and a summary of petitions. Summary tables including of all the comments received to the Preferred Options Consultation can be found using the following web link:

https://www.york.gov.uk/downloads/download/3050/local_plan_preferred_options_consultations_summary_tables

5.4 York’s Local Plan Preferred Options was subject to an 8 week consultation from the 5th June to 31st July 2013. Approximately 9,457 responses were received from 4,945 respondents. In addition to individual responses 21 petitions were submitted during the consultation

period, containing a total of 9,111 signatures. This was the highest number ever received in York for a consultation of this type.

- 5.5 During the consultation the Council held: 14 public exhibitions, a staff exhibition at West Offices, 16 meetings with prescribed bodies and key groups and an event was held at the Bar Convent with potential developers for key sites. This was coupled with a high level of media coverage in the local, regional and national press (including the York Press, Yorkshire Post, The Economist and Telegraph).
- 5.6 Additionally, a leaflet advertising the consultation and letting people know how they could comment on the proposals was distributed to every household. Specific consultees including Natural England, English Heritage, the Highways Agency, neighbouring authorities and parish councils were contacted by email or letter to inform them of the consultation process. We also wrote to or emailed approximately 1800 groups, businesses and individuals who previously registered an interest in planning in York and were on the Local Plan Database, to make them aware of the consultation.
- 5.7 A copy of the main documents was available for the public to view in each City of York Council libraries and in West Offices reception. A list of evidence base documents and how they could be viewed was also provided. A link was created from the Council homepage to a new Local Plan Preferred Options page. The new webpage set out what the document was, listed the consultation documents and provided details on the consultation. Several petitions were also received.

Local Plan Further Sites (2014)

- 5.8 During the Local Plan Preferred Options consultation, additional information on sites was submitted by landowners and developers. This included the submission of new sites and further evidence on existing sites. In addition Officers were also undertaking work with the agents and landowners of strategic sites. This was a key part of the process of assessing suitability and deliverability before progressing to the Local Plan's publication stage. Before making any final recommendations on sites to include in the Local Plan for publication and examination the Council wanted to understand the public views on the new sites, the reconsideration of some sites that were previously rejected and potential boundary changes on some of the strategic allocations, this was done through a Further Sites Consultation.

5.9 A City of York Local Plan Further Sites Consultation Statement (2015) was prepared and sets out in detail the consultation documents, who were invited to make the representations, how people were invited to make the representations, the number of responses received, details on the petitions received and the main issues raised. This can be found in Annex 11 to this report. For the purpose of this report, a summary is also provided below. The Annexes to Annex 11 also gives a copy of comments form, a copy of the letter to consultees, the main issues raised through consultation on the Technical Appendices. Summary tables of the comments received to the Further Sites Consultation can be found using the following web link:
https://www.york.gov.uk/downloads/download/1216/local_plan_further_sites_consultation_summary_tables

5.10 The Further Sites Consultation was subject to a six week consultation between Wednesday 4th June and Wednesday 16th July 2014. Approximately 9,595 responses were received from 3,903 respondents. In addition to individual responses five petitions were submitted during the consultation period, containing a total of 1,664 signatures. How people were invited to make representations is set out below:

- Several targeted consultation events took place including the following exhibitions: B&Q Foyer, Hull Road (Tuesday 10th June from 2.30pm to 7.30pm, Monks Cross Shopping Park – Car Park (Thursday 26th June from 2.30pm to 7.30pm), City Centre – Parliament Street (Wednesday 2nd July from 10am to 4pm).
- Area Based meetings were also held with Ward Councillors, Parish Councillors and Planning Panels.
- There was a Council website notice on the City of York Council homepage under Current Consultations. In addition all documents and supporting information available to view on the Council's website.
- A press article was placed in the local Press newspaper on 31st May 2014. A Your Voice Article: – was sent to every household in York.
- A set of hard copies of the consultation documents were placed in West Offices Reception and in libraries across York. Area based

maps are also available in each library showing the proposals in that location.

- The local plan twitter feed/facebook were used to publicise the consultation. All consultees on the Council's Local Plan database, which includes anyone who commented at the Preferred Options stage or has otherwise registered an interest in planning in York (approx. 9000), were sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information.
- There were several ways in which people and organisations were able to comment on the consultation documents. These were by:
 - filling in the comments form (electronically or in writing). Paper copies were placed in the York libraries, West Offices Reception and the exhibitions. People could use the Council's online consultation tool and complete an online response form with questions available on the website at www.york.gov.uk/localplan
 - writing to the Local Plan team using a FREEPOST address: FREEPOST RTEG-TYYU-KLTZ, City of York Council, West Offices, Station Rise, York, YO1 6GA.
 - emailing the Local Plan team at localplan@york.gov.uk

Local Plan Preferred Sites Consultation (2016)

5.11 The Local Plan Preferred Sites Consultation (2016) draws on the previous stages of consultation and technical work undertaken to support the plan. Its purpose was to allow the public and other interested parties to comment on the additional work relating to housing and employment land need and supply and also presented a revised portfolio of sites to meet those needs.

5.12 The Preferred Sites Consultation 2016 took place for a period of eight weeks from Monday 18th July 2016 to Monday 12th September 2016; the statutory 6 week period was extended to take account of the consultation taking place during the summer school holiday period. The Council received 4,286 responses overall from 1,766 respondents. The Local Plan Preferred Sites Consultation Statement (September 2017) gives in detail the consultation documents that were produced, sets out who was consulted, outlines the methods and techniques used during

the consultation and summarises the main issues raised in the responses received. This can be found at Annex 12 to this report. Summary tables of the comments received to this consultation can be found at the following web link:

https://www.york.gov.uk/downloads/download/4038/preferred_sites_consultation_response_summaries

5.13 An outline of how people were invited to make representations on the Local Plan Preferred Sites consultation is set out below:

- a press release to advertise consultation and how to respond was issued on 15th July, along with key media interviews including Radio York, Minster FM and York Press;
- all documents and response forms were made available online at www.york.gov.uk/localplan and on the main City of York website consultation finder;
- hard copies of all the consultation documents, exhibition boards and response forms were placed in West Offices Reception; it was also possible for those who required hard copies to ring or email the forward planning team and request a copy of the documents;
- hard copies of all the consultation documents and response forms were placed in Council libraries for the duration of the consultation;
- city wide distribution via Our Local Link of an 'Our City Special' with area based maps and free post response form delivered to every household;
- email or letter to all contacts registered on Local Plan database, including members of the public, statutory consultees, specific bodies including parish councils and planning agents, developers and landowners;
- staffed drop-in sessions/public exhibitions at venues across the City at the following locations:
 - Zone 1: 24th August - Tesco (Tadcaster Road), Dringhouses
 - Zone 2: 16th August - York Sport, Heslington
 - Zone 3: 11th August - Dunnington Reading Rooms, Dunnington
 - Zone 4: 3rd August - West Offices, York City Centre/ 9th August - Osbaldwick Sports Centre, Osbaldwick
 - Zone 5: 18th August - Acomb Explore Library, Acomb
 - Zone 6: 24th August - Oaken Grove Community Centre, Haxby

- exhibition boards and consultation documents including response forms available at ward committee meetings;
- meetings with statutory consultees and neighbouring authorities;
- presentation and question and answer session with York branch of the Yorkshire Local Council Association (attended by Parish Councils), York Property Forum/Chamber of Commerce and the Environment Forum; and
- targeted social media campaign via Facebook and Twitter running for the duration of the consultation.

5.14 There were several ways in which people and organisations could comment on the Preferred Sites consultation. These were by:

- filling in the comments form (available on the Council's website, on the back page of the city wide leaflet and at the libraries/west offices/exhibitions);
- writing to the Local Plan team, via a freepost address;
- emailing the Local Plan team; or
- using the Council's online 'Current Consultations' tool (Survey Monkey) and completing an online response form with questions, via the Council's website.

Pre Publication draft Local Plan Consultation (2017)

5.15 Following the Local Plan Preferred Sites Consultation in 2016 several important factors arose. On the 5th December 2016 a report was considered at the Council Local Plan Working Group (LPWG). The LPWG Report highlighted two key factors firstly, on the 12th July 2016 the Department of Communities and Local Government (CLG) released the Sub National Household Projections (SNHP) which update the May 2016 release of the Sub National Population Projections (SNPP). This release indicates a higher demographic starting point for York and secondly, the Ministry of Defence (MOD) announced on 7 November that they would be disposing of a number of military sites across the country as part of their Strategy – A Better Defence Estate (MOD, 7 November 2016) this included three sites in York: Imphal Barracks, Fulford Road; Queen Elizabeth Barracks, Strensall; and Towthorpe Lines, Strensall. On the 23rd January 2017 City of York Council Members considered a LPWG Report which provided an update on the emerging Local Plan and in particular on the initial consideration of the newly submitted Ministry of Defence (MOD) sites against the Local Plan Site

Selection methodology following a report to Executive on 7 December 2016. Following this technical work was carried out which established that the sites represented 'reasonable alternatives' and, therefore, should be considered as part of the Local Plan process. On 7 February 2017, the Department for Communities and Local Government (DCLG) published a Housing White Paper. As part of which, DCLG also consulted on changes to planning policy and legislation in relation to planning for housing, sustainable development and the environment. In response to the context described above the Council undertook further work relating to the following interrelated areas:

- The MOD sites and related supply implications;
- Housing Need;
- Employment Need
- Housing and Employment Land Supply and related consultation responses; and
- Non housing and employment land related policies.

More detailed information on these areas of work can be found in the LPGW Report which was considered on the 10th July 2016 and as part of the Councils Executive Report, 13th July 2017 and it's associated annex's, please refer to Annex 2 of this report for the Executive Report. Given the level of change a consultation on a full plan and policies was agreed by the Executive on 13th July 2017.

5.16 A city-wide consultation on the Local Plan Pre Publication Draft (Reg 18) commenced on the 18th September 2017 and finished on 30th October 2017. During the consultation period the Council received responses from circa 1,295 individuals, organisation or interest groups. Given that those responding tend to raise multiple points this equates to around 4,000 representations

5.17 The City of York Local Plan Pre-Publication Consultation Statement (February 2018) which is Annex 13 to this report summarise this Pre-Publication consultation; it outlines the consultation documents that were produced, sets out who was consulted, the methods and techniques used during the consultation and summarises the main issues raised in the responses received. Summary tables of the comments received to this consultation can be found using the following web link:
https://www.york.gov.uk/downloads/download/4256/local_plan_pre-publication_consultation_summary_tables

5.18 A summary of how people were invited to make representations on the Local Plan Pre-Publication consultation is set out below:

- a press release to advertise the consultation and how to respond was issued 15th September 2017;
- all documents and response forms were made available online at www.york.gov.uk/localplan and on the main City of York website consultation finder;
- hard copies of all the consultation documents, exhibition boards and response forms were placed in West Offices Reception; it was also possible for those who required hard copies to ring or email the forward planning team and request a copy of the documents;
- hard copies of all the consultation documents and response forms were placed in Council libraries for the duration of the consultation. In accordance with the SCI, all CYC libraries held a hard copy of the main Pre-Publication draft document, the proposals maps and a Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Summary. All other supporting documents were available to view online, with the help of guidance notes provided.
- An 8-page Local Plan Special Edition of Our City delivered to every household in York via Our Local Link, with area based maps and free post response form;
- email or letter to all contacts registered on Local Plan database, including members of the public, statutory consultees, specific bodies including parish councils and planning agents, developers and landowners;
- staffed drop-in sessions/public exhibitions at venues across the City (see below);
- exhibition boards and consultation documents including response forms available at ward committee meetings;
- meetings with statutory consultees¹ and neighbouring authorities;
- presentation and question and answer session with York branch of the Yorkshire Local Council Association (attended by Parish Councils), York Property Forum/Chamber of Commerce and the Environment Forum; and
- targeted social media campaign via Facebook and Twitter running for the duration of the consultation.

5.19 There were several ways in which people and organisations were able to comment on the consultation documents. These were by:

- filling in the comments form (available on the Council's website, on the back page of the city wide leaflet and at the libraries/west

- offices/exhibitions);
- writing to the Local Plan team, via a freepost address;
- emailing the Local Plan team; or
- using the Council's online 'Current Consultations' tool (Survey Monkey) and completing an online response form with questions, via the Council's website.

5.20 A series of targeted meetings and exhibitions were arranged to publicise the consultation and engage with interested parties. The dates and venues of the public exhibitions were included in the city-wide publication of Our City. The exhibitions were staffed by officers and provided the opportunity for members of the public to find out about the consultation. Consultation material and area based maps were also available to view. The City was split into five areas for the purpose of the maps to be contained in Our City (the follow the rivers/main roads to avoid dividing sites/residential areas). Eight public exhibitions were held across the city, each staffed by at least 2 officers and provided the opportunity for members of the public to find out about the consultation. Consultation material and area based maps were also available to view.

- Monday 2nd October at Strensall & Towthorpe Village Hall, Strensall (3pm- 7:30pm)
- Wednesday 4th October at Fulford Social Hall, Fulford (3pm 7:30pm)
- Thursday 5th October at Clifton Library, Clifton (3pm-7pm)
- Monday 9th October at Tang Hall Library, Tang Hall (3pm-7:30pm)
- Wednesday 11th October at West Offices, York City Centre (3pm-7:30pm)
- Monday 16th October at Acomb Explore Library, Acomb (3pm-7:30pm)
- Tuesday 17th October at York Sport, Heslington (3pm-7:30pm)
- Wednesday 18th October at Oaken Grove Community Centre, Haxby (3pm-7pm)
- A further exhibition was held at York College in the atrium on Thursday 19th October 2017 10am-2pm, specifically to target the views of young people.

5.21 Community Involvement (Neighbourhood) Officers were briefed and provided with consultation material to take to ward committees during the consultation period.

5.22 A briefing session for Parish Councils was held on Wednesday 27th

September 2017 with the York Local Council Association which included representatives from all Parish Councils across York.

5.23 Specific Consultees (approx. 100) including Natural England, Historic England, the Environment Agency and Highways England, neighbouring authorities and Parish Councils were sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information. Meetings with these groups were also arranged during the consultation period.

5.24 All other consultees on our database, which includes anyone who commented on any previous stages of the local plan or has otherwise registered an interest in planning in York (approx. 10,000), was sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information.

5.25 All Members received a briefing note setting out the proposed consultation methods and details of the consultation at the start of the consultation period, and a copy of the main documents was placed in the Member's group rooms at the Council's West Offices.

5.26 All Directors, Assistant Directors and other relevant officers were sent details of the consultation and informed where they could view the documents.

5.27 In addition to the more formal approaches for cooperating with prescribed bodies and other relevant organisations, City of York Council has engaged on an ongoing basis through an extensive series of informal (but recorded) meetings with such bodies and organisations, on a largely one-to-one basis, in relation to the Duty to cooperate. These meetings took place as part of Pre-Publication consultation and are set out in the table under Paragraph 4.13 of Annex 13 to this report. In addition to these meetings, regular sub-regional or sub-area meetings, and meetings for specific projects, where formal minutes or notes are otherwise available, also took place as follows:

- Leeds City Region (LCR) Strategic Planning Duty to Cooperate Group
- LCR Community Infrastructure Working Group
- Local Government North Yorkshire and York (LGNYY) Spatial Planning and Transport Board
- LGNYY Spatial Planning and Transport Technical Officers Group (TOG)

- York Sub-area Joint Infrastructure Working Forum (YSAJIWF)
- North Yorkshire Development Plans Forum
- East Coast Mainline Authorities group (ECMA)
- ECMA Technical Officers Group
- Rail North (potential Rail Franchisor under decentralisation)
- Business Case for improving the York-Harrogate-Leeds line
- TransPennine Electrification
- Asset Board
- A64 Officer's

6.0 How Comments have been taken into Account

- 6.1 This section identifies where information can be found on how comments have been taken into account and signposts the relevant documents in relation Regulation 18.
- 6.2 The *City of York Local Plan Sustainability Appraisal Appendix K– Policy and Site Audit Trail (February 2018)* document sets out an audit trail of the development of policy and sites. To ensure the chronology of policy development was captured an 'audit trail' was completed which addressed national policy, local evidence, the SA/SEA, third party representations and the reasons for changes at each stage. This analysis described how policy has evolved from initial conception through to the Consultation (2017). An audit for each policy theme/area rather than for every policy was completed. Please refer to Annex 1 of this report. The strategic sites audit trail provides an understanding of the evolution of Strategic sites that have been identified as reasonable alternatives through the site selection process and considered for potential allocation in the Local Plan, this is also in Annex 1 to this report. All of the sites which passed criteria 1 to 4 were considered reasonable alternatives but some were not chosen as allocations. Between Pre-Publication 2017 and Publication 2018 the list of reasonable alternative sites has been subject to further technical officer analysis which included updates to availability and deliverability, analysis of further evidence in relation to show, stoppers and technical officer comments. Part 3 of Annex K which is Annex 1 to this report summarises this information.

6.3 Since the Local Plan Publication Draft was taken to Members in autumn 2014 there have been a number of national and local policy updates. The evidence base that underpins the emerging Local Plan has also progressed. The Local Plan has also evolved in response to consultation responses. It has therefore been important to take these national and local updates including consultation responses into account when developing the local plan policies. On this basis the Council undertook further work to refine the local plan policies. The changes were wide ranging and are provided in Annex 7 of the Council's Executive Report from 13th July 2017. It includes a schedule of track changes to show the non employment and housing sites/growth related policies modifications to York's Local Plan since the Preferred Options Local Plan in 2013 this is included as Annex 2 of this report. Annex 2 of this report also includes the officer assessments of housing, employment and other sites since Preferred Sites Consultation (2016) these are highlighted in Annex's 3-5 of the 13th July Executive Report. These officer assessments summarise the comments made through the Preferred Sites Consultation (2016) and recommendations to the Executive about how these changes could be taken into account. The minutes of this meeting are also included within Annex 2 of this report.

6.4 The changes made between the Pre-Publication (2017) and Publication (February, 2018) Local Plan are set out in part of the Council's Executive Report from 25th January 2018, please refer to Annex 3 of this report. A detailed summary of the comments made to the Pre-Publication Consultation and how they were taken into account in the drafting of the Publication Consultation is shown. This was Annex A to the Executive Report 25th January 2018. The Annex contains a proforma for each policy in the emerging Local Plan which includes:

- changes to policy post Pre-Publication Consultation with changes shown as 'tracked changes';
- supporting text changes;
- summary of reasons for change; and
- consultation responses summarised as supports, objections and comments.

6.5 The proformas are in plan-order and presented in two sections; policies and general site allocations. This includes suggested changes to the sites and alternative site allocations. All strategic sites (ST) are represented in the SS site policies section. A table of sites submitted that were previously rejected or new sites considered are also summarised. Appendix 1 to Annex A of the Executive Report sets out

analysis of any re-submitted previous rejected sites and any new sites that have been submitted as part of the consultation which have been identified as having potential for allocation. Additional changes to the Publication Local Plan (February, 2018) were also made following the Executive on 25th January 2018. These are also included as Annex 3 to this report. The minutes from the 25th January 2018 are also included in Annex 3.

6.6 The comments submitted as part of the consultation on the Publication Draft Local Plan are not referred to in this section as there is no requirement to take these into account before submission to the Secretary of State for Examination. Section 7 and 8 below set out the consultation process and the main issues raised during the Regulation 19 Consultation on the Publication Draft Local Plan which commenced in February 2018.

7. Publication Draft Local Plan Consultation (February, 2018)

7.1 Following the Pre-Publication Consultation the responses were considered and a final Publication Draft Local Plan was produced. It was agreed by Members on 25th January 2018 that the Plan could be subject to public consultation. The consultation ran for 6 weeks from 21 February to 4 April 2018.

Who was invited to make representations

Specific Consultees

7.2 Specific Consultees include Natural England, Historic England, the Environment Agency and Highways England, neighbouring authorities and parish councils. This group of consultees (approx. 80) was sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information. A list of these consultees is contained in Annex 14.

General Consultees

7.3 All other consultees on our database, which includes anyone who commented on any previous stages of the local plan or has otherwise registered an interest in planning in York (approx. 10,000), were sent an email/letter informing them of the opportunity to comment and details of

the web page and where to find more information. A copy of the letter is contained in Annex 15.

Wider public

- 7.4 Every household in York (over 87,000) received a leaflet promoting the consultation through their letterbox. The council's internal and corporate communications channels were also used, as well as distribution networks available via the communities and neighbourhoods team. A copy of the leaflet is contained in Annex 16

Internal Consultation

- 7.5 All Members, Directors, Assistant Directors and other relevant officers were sent details of the consultation and informed where they could view the documents.

Accessible Information

- 7.6 Key consultation documents were made available in accessible formats on request, including large print or another language.

Duty to Cooperate

- 7.7 Consultation with neighbouring authorities took place utilising existing structures through the Leeds City Region (LCR) and Local Government North Yorkshire and York (LGNYY) sub-regions, in both of which the City of York is a constituent local authority. The formal groupings within the LCR and LGNYY where issues relating to the Duty are raised are, primarily:

- Leeds City Region Planning Portfolios Board (Member Group)
- Leeds City Region Strategic Planning (DtC) Group (Officer Group)
- Leeds City Region Heads of Planning (HoP) (Officer Group)
- Leeds City Region Directors of Development (DoDs) (Officer Group)
- North Yorkshire and York Spatial Planning and Transport Board (Member Group)
- North Yorkshire, York and East Riding Heads of Planning (Officer Group)
- North Yorkshire, York and East Riding Directors of Development Group (Officer Group)
- North Yorkshire and York Spatial Planning and Transport Technical Officers Group (ToG) (Officer Group) (prior to Jan 2016 when replaced by HoP and DoDs)

7.8 Meetings took place with the Leeds City Region Planning Portfolios Board on 15th December 2017 and the North Yorkshire and York Spatial Planning and Transport Board on 17th January 2018 to discuss the Pre-Publication Draft Local Plan, in advance of the Publication Draft consultation. At both meetings, the approach taken in preparing the Plan was endorsed.

7.9 In addition, consultation with neighbouring authorities and other prescribed bodies has taken place through ongoing meetings with individual authorities and bodies since 2012. The last series of meetings on the Local Plan Publication Draft, February 2018 (Regulation 19 Consultation) was as follows:

- Environment Agency (15th March 2018);
- East Riding Council (3rd April 2018);
- Highways England (20th February 2018);
- Historic England (28th February 2018 and 28th March 2018);
- North Yorkshire County Council (16th March 2018);
- Ryedale District Council (26th March 2018);
- Selby District Council (22nd March 2018);
- York North Yorkshire & East Riding LEP (21st March 2018)

How people were invited to make representations

Media

7.10 The council communications team issued three media releases relating to the consultation; to mark the booklet distribution, the beginning of the consultation and one with a 'two weeks to go' reminder. The Local Plan has regularly appeared on the news agenda throughout the consultation, with council media releases, journalists' enquiries and the interventions of other stakeholders leading to at least ten articles in the York Press alone. York Mix, Minster FM and Radio York have also both covered the consultation and related issues. Details of these items are contained in Annex 17.

CYC Website

7.11 A new 'Publication Draft Local Plan February 2018' consultation page linked from the 'Current Consultations' section on the Council homepage. The new webpage set out what the documents are, lists the consultation documents, give details of the consultation and how to respond.

7.12 The existing 'New Local Plan' webpage was also updated with all of the consultation details, links to downloads and the online consultation form.

7.13 In summary, the Local Plan landing page was viewed 7500 times during the consultation, including 4966 unique views.

CYC Libraries and WO Reception

7.14 A set of hard copies of the consultation documents were placed in West Offices Reception and all CYC libraries.

Twitter Feed/Facebook

7.15 The council's corporate social media accounts were used to publicise the consultation. Twitter and Facebook, including boosted facebook ads targeting adult facebook users in York, were used to publicise the start of the consultation and towards the end of the consultation period to make people aware that the deadline for comments is approaching. Video and image-led content was used to emphasise the scope of the consultation and explain the process.

7.16 In line with effective engagement strategies employed in previous consultations and campaigns, a £250 budget was be set aside to 'boost' this content to make sure they reach an audience beyond those already engaged with the council.

7.17 In summary, posts were seen 40,626 times, prompting 3810 engagements (likes, comments, shares or clicks on the content).

Leaflets

7.18 An A5 leaflet went to every household (over 87,000) in York. It was distributed by Your Local Link between 14 and 25 February.

Council Intranet

7.19 Articles about the consultation were placed in the online internal newsletter throughout the consultation.

Method of Response

7.20 There were several ways in which people and organisations were able to comment on the consultation documents. These were by:

- filling in the comments form (this was available electronically on our website, and as hard copies at West Office reception and at CYC libraries).
- using the Council's online 'Current Consultations' tool and completing an online response form with questions accessed from the Council's website.

A copy of the comments form is contained at Annex 18.

Consultation Documents

7.21 All documents were available online on the Local Plan webpage and a full set of hard copies of the consultation documents were placed in West Offices Reception to be viewed. All CYC libraries held a hard copy of the Local Plan Publication document, the policies maps and a Sustainability Appraisal (SA/SEA) Non Technical Summary. All locations had the following consultation material:

Main Documents

- City of York Local Plan Publication Draft (February 2018)
- City wide policies maps (North/South/City Centre inset)
- Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

N.B. Background evidence which has informed the Local Plan was published on a new evidence base webpage.

Consultation Material

- Comments form (electronic and hard copies)
- 8 page city-wide leaflet
- Poster (Annex 19)
- Statement of Representations Procedure (including Statement of the Fact) (Annex 20)

Responses

7.22 During the Regulation 19 consultation period we have received responses from circa 850 individuals, organisation or interest groups, this equates to approximately 5,000 separate comments. One petition was received as part of this consultation. This contains 1149 signatures in opposition to a proposal for a 'substantial housing development' being promoted by land owners between Stockton Lane and Malton Road.

- 7.23 All comments made will be submitted to the Planning Inspectorate for examination and will be made available on line on submission of the Plan.
- 7.24 A full index of all the respondents is contained at Annex 21, along with a Sequential Identification number (SID) which relates to their individual responses.
- 7.25 A Schedule of Representations in Policy Order which contains a summary of each comment received is contained at Annex 22. The summary of responses has been prepared by Officers to provide a guide to highlight the broad issues raised during this stage of consultation. It should not be taken as a substitute for the full and comprehensive set of all duly made representations. A full set of representations will be publicly available from the Programme Officer's library, and available to view on the Council's website once the Plan is submitted.
- 7.26 Section 8 of this statement sets out the Main Issues Raised as part of the Publication Draft Local Plan Consultation.

8.0 Main Issues Raised during Regulation 19 Consultation

8.1 A set of tables at the end of this section identify the main issues by Plan theme, raised at Regulation 19. In brief, these include:

8.2 *General, Background, Vision and Development Principles*

- A number of comments state that the plan is not considered sound or legally compliant as it does not comply with elements of the NPPF, particularly in regard to the approach to the green belt. (See ‘Spatial Strategy’ below for further detail).
- Those who consider the Plan sound offer additional points of clarification, particularly regarding aspects of policies relating to strategic sites. This includes:
 - Ryedale District Council
 - Selby District Council, noting that both authorities are committed to meeting their objectively assessed housing need;
 - Hambleton District Council;
 - York, North Yorkshire and East Riding LEP, which considers the plan to be both legally compliant and sound, noting the imperative to move to adoption quickly to allow housing and employment targets to be delivered;
 - Historic England support the approach to managing growth which limits impact on the special character and setting of the City (note, EH raise several soundness issues re individual strategic sites);
 - Huntington Parish Council
 - Earswick Parish Council
 - Strensall with Towthorpe Parish Council
 - Internal Drainage Board (noting specific issues regarding surface water drainage)
- Both Harrogate Borough Council and North Yorkshire County Council highlight the need for York’s Plan to set an enduring green belt boundary and meet its full OAHN. NYCC further comments on need for the Plan’s Mineral and Waste policies to reflect the North Yorkshire and York Minerals and Waste Joint Plan.

8.3 *Spatial Strategy including Strategic Sites*

- Many residents support the principle of a Plan establishing a permanent Green Belt boundary and the approach taken in removing identified areas of safeguarded land from the Plan. Planning agents and developers argue that the boundary is too tightly drawn and will not

endure beyond the plan period, ie not provide permanence. They further comment that the Plan is overly reliant on development from a few strategic sites (notably York Central) which may not deliver as anticipated.

- Responses from planning/property agents tend to raise objection to the Plan's annual housing target of 867 units, which reflects neither the SHMA evidenced by independently appointed consultants nor the emerging DCLG methodology. Many believe the Plan to be unsound on this basis.
- The majority of the developers and landowners with interests in the strategic sites support the allocations in principle. However, several request amended boundaries and/or an increase in yield for their sites including ST4, ST7, ST8, ST14, ST15, ST16, and ST31.
- While supporting the general principle of a development strategy which limits peripheral growth to safeguard key elements of the City's special character, Historic England raise concerns regarding the impact of specific strategic sites (including York Central and University of York expansion) on the historic character and setting of the City. Several other respondents question the soundness of including specific sites, the details of which are set out in Annex 22. This includes Osbaldwick Parish Council, Wheldrake Parish Council, Haxby Town Council, Fulford Parish Council, Elvington Parish Council, Heslington Parish Council, Upper and Nether Poppleton Parish Councils
- East Riding of Yorkshire Council question whether the scale of ST15 is sufficient to deliver necessary supporting infrastructure. On the whole, responses received from local residents in relation to strategic sites tend to raise soundness concerns relating to reasons of impact on surrounding roads, drainage, wildlife, schools and other infrastructure.
- Natural England identified concerns including the need for a final HRA, along with potential impacts on Strensall Common SAC and in relation to ST15.

Strategic Sites

The majority of the developers and landowners with interests in the strategic sites support the allocations in principle. However, several request amended boundaries and/or an increase in yield for their sites including ST4, ST7, ST8, ST14, ST15, ST16, and ST31.

8.4 *Economy and Retail*

- Most objections deem the amount of land allocated for employment use inadequate as it does not match the City's ambitions for economic growth, particularly in B1a terms.
- Concern that reliance on few large sites does not provide a variety of choice and or the allocated land will not provide sufficient employment for new residents over the course of the plan

8.5 *Housing Policies including Housing Allocations*

- Some alternative sites have been submitted and will be presented to the Inspector for consideration;
- Support for the overall soundness of the policy. Those opposing the general thrust of policy raise the following issues:
 - non-conformity with NPPF para 182;
 - the Plan is not able to demonstrate a 5-year supply upon adoption;
 - the methodology behind site selection is not sufficiently detailed;
 - the inclusion of off campus student housing commitments and completions is inappropriate in determining housing supply;
 - noting the above, that the inclusion of windfalls is not a plan led approach and could create uncertainty leading to under-delivery.
- Some respondents question how the proposed densities have been calculated. It is argued that high densities will result in flatted development which is not needed in York.
- Whilst some respondents support the flexibility provided in relation to housing mix, other suggest that greater flexibility is required on a site-by-site basis.
- Whilst many local communities support the approach to Gypsy and Traveller provision, some are concerned that the proposed policies fail to satisfy national policy in terms of deliverability through strategic sites and will therefore not fully meet the needs of the travelling community.
- Developers ask that clarification should be provided as to how the demand for gypsy and traveller pitches within new housing developments has been assessed. York Travellers Trust consider the Plan neither legally compliant nor sound in underestimating G+T need, and that it fails its duties under the 2010 Equality Act by not allocating sites.
- Respondents ask that the policies for student accommodation and HMOs are strengthened

Site comments:

- Generally, developers and landowners support the allocation of their sites in principle, although amended boundaries and/or yields and increased flexibility are suggested for H31, and H59.
- Many residents raised specific objections to individual allocated sites, citing the impact on the Green Belt and lack of infrastructure in most cases. Many feel that the plan identifies too many allocations on green field sites.
- Some local residents wish to see lower densities on sites to reduce their impact on infrastructure and existing residents.

8.6 *Health and Wellbeing*

- The majority of respondents make reference to the fact that the issue of the retention and re-use of existing community assets is of the utmost importance in the delivery of the plan and that a strengthening of policy in respect of evidence underpinning their use or re-use is required.
- Several respondents feel that further clarification on the level of developer contribution required is needed.

8.7 *Education*

- Support for the Plan's recognition of the role of the city's Universities in delivering economic growth. Some concern that the Plan does not provide sufficient land for the University of York to grow.
- Some respondents feel that any proposals for development at the University of York should mitigate the effects of housing, traffic and parking to lessen the impact on local communities

8.8 *Placemaking, Heritage, Design and Culture*

- In general these policies are supported by respondents.
- Some developers feel that there is too much emphasis on developer contributions and that the responsibility for placemaking and culture lies with the Council.

8.9 *Green Infrastructure*

- Several developers feel that further detail and clarification on the level of developer contribution is required.
- Many responses related directly to the provision of new open space sites OS1-OS12 which are generally supported by local residents

8.10 *Managing Appropriate Development in the Green Belt*

- The Green Belt policies are generally supported by residents, with many recognising that their adoption will provide will create a Green Belt for

York that 'will provide a lasting framework to shape the future development of the city ...'

- Others consider that they are overly restrictive and offer little opportunity for rural businesses.

8.11 *Climate Change*

- Some developers argue that energy requirements for new housing developments are solely the remit of Building Regulations and the Plan should not be imposing more onerous requirements on developments. In particular, several state that the requirements to achieve BREEAM 'excellent' rating is unduly restrictive and may render schemes unviable.

8.12 *Environmental Quality and Flood Risk*

- Some respondents consider that these policies are not strong enough in relation to air quality, flooding and drainage.
- Many respondents highlight the impact that traffic congestion has on air quality which will be made worse by an increase in houses;
- Several respondents suggest ways of strengthening air quality policy including the requirement for air quality assessments in areas of the city where large amounts of development are proposed;
- Some developers state that further detail and clarification is required on the extent of developer contribution.

8.13 *Waste and Minerals*

- Detailed minerals and waste policies are contained in the Minerals and Waste Joint Plan. Any policies in the York Local Plan must ensure that they are consistent with strategic policies in the MWJP.

8.14 *Transport and Communications*

- Some respondents consider that the current upgrades to the A1237 outer ring road are inadequate and that the road needs to be duelled
- It was highlighted that the connectivity and capacity of the current cycle and pedestrian networks need to be addressed
- Comments about communications infrastructure refer to new development schemes needing to be future proofed to facilitate the provision of mobile, broadband and wireless communications infrastructure, including in the public realm and within private buildings.
- Overall, several respondents request further detail on policy implementation and required developer contributions.

8.17 The tables below contain a more comprehensive summary of the main issues raised during the Regulation 19 Consultation on the Publication draft Local Plan. These are broken down into:

- Table 1: Main Issues Raised by Prescribed Bodies
- Table 2: Main Issues Raised by Adjacent Local Authorities
- Table 3: Main issues Raised about the SA/SEA
- Table 4: Main issues Raised in Plan Order including site proformas

8.18 These summaries have been prepared by Officers to provide a guide to highlight the broad issues raised during this stage of consultation. It should not be taken as a substitute for the full and comprehensive set of all duly made representations. A full set of representations will be publicly available from the Programme Officer's library, and available to view on the Council's website once the Plan is submitted. Annex 22 to this report contains a summary of all comments raised, set out in Plan order.

Table 1: Main Issues Raised by Prescribed Bodies

Prescribed Body	Main Issues Raised
Natural England	<ul style="list-style-type: none"> • Raise a number of concerns about the lack of final assessment for the Conservation of Habitats and Species Regulation 2017 (HRA); • Advises that the SA should be updated following the conclusions of an updated HRA when that information becomes available. The SA should also be updated once additional air quality assessments that address the impact of traffic emissions on nationally and internationally designated sites has been completed; • The information provided in relation to the assessment of recreational disturbance and urban edge effects upon Strensall Common SAC and SSSI is insufficient, making the Plan unsound; • Welcome the requirements set out in Policy SS19 that relate to Strensall Common, however, do not consider that sufficient evidence is available to judge whether such measures would be sufficient to avoid adverse effects on the integrity of the SAC or damage to the SSSI; • Outstanding concerns regarding the potential for functional linkages between birds found on ST15 and the

	<p>Lower Derwent Valley Special Protection Area;</p> <ul style="list-style-type: none"> • Welcomes policy SS13 which sets out the necessary compensation and mitigation measures in the context of the conclusions of the SA, concerning the preferred Spatial Strategy and Site ST15, • Welcomes policy GI2, but recommends the consideration of references to the protection afforded to internationally and nationally designated sites in line with paras 113 and 117 of NPPF and the policy is updated to clarify around how windfall sites are treated; • Recommends that the policies map is updated to clearly distinguish between nationally and internationally designated sites of ecological value; • Advise including a specific reference to the protection of best and most versatile agricultural land. Also advise specific reference to the importance of protecting wider soils resources including in relation to ecosystem services such as carbon storage and their role in flood prevention; • Consider including protection for ancient woodland and veteran trees in Policy GI4, in line with para 118 of NPPF; • There are a number of woodlands on the Ancient Woodlands Inventory within the CYC area which should be included on the Policies Map; • ST15 has had various boundary changes through the different drafts of the Local Plan, and a great deal of evidence has been gathered but not made public, this should be published to clarify what evidence is relevant to various boundaries and amendments; • Welcome the assessment against Objective 8 in the SA, which is detailed and accurate. Agree with the scoring and weighting applied.
<p>Historic England</p>	<ul style="list-style-type: none"> • Welcome the intention to limiting the amount of growth which is proposed around the periphery of the built-up area of the City to safeguard key elements identified in the Heritage Topic Paper as contributing to the special character and setting of the historic city. • The new free-standing settlements – as a strategy for accommodating York’s development needs, new free-standing settlements will result in far less harm to the special character and setting of the historic city than would be caused by development on the edge of the

	<p>existing built-up area of the City. The plan should set out its development strategy more clearly.</p> <ul style="list-style-type: none"> • York Central - support the redevelopment of this brownfield site, but are concerned about the potential impact the level of development might have upon the city's heritage. No evidence base to support 2,500 dwellings and 100,000sq m of office floorspace which would not result in adverse impact on City's infrastructure, traffic, and heritage. • The University - concerned about the area identified for the future expansion of the University and feel further consideration is needed to safeguard the elements which contribute to the setting of the City. • Other Strategic Sites - several of the sites do not appear to have taken account of the elements which the Council has identified as contributing to York's special character. • Various suggested amendments to policies and sites.
<p>Environment Agency</p>	<ul style="list-style-type: none"> • Comment that the Plan is not legally compliant or sound, but that this would be ameliorated by including additional text to require developers to meet the requirements of the Water Framework Directive. • Several further detailed comments, including suggested modifications, regarding sites: <ul style="list-style-type: none"> - H7, to further distinguish between areas allocated for open space and student housing in terms land within Flood Zone 3b; - ST20, raising no concerns to the principle of multi-storey parking at St Georges Field, providing that development does not increase flood risk vulnerability. However, EA do not support any development in the Foss Basin, with the possible exception of water compatible uses, subject to detail. As such they do not consider it appropriate to include the Foss Basin within the ST20 site allocation and that the Local Plan should not be adopted with this allocation included.
<p>Highways England</p>	<ul style="list-style-type: none"> • The A64 should be included within the plan definition of York's strategic road network. • HE can confirm that a new access on the A64 has been agreed in principle to serve land west of Elvington Lane as highlighted in Policy T4. The junction layout is not yet agreed and is subject to approval of acceptable proposed

	<p>alignment and design.</p> <ul style="list-style-type: none"> • Policy SS4 (York Central) should include reference to the A64 Hopgrove Roundabout improvement (A64/A1237) that is currently in preparation, with the aim of inclusion for implementation in the next roads period. • HE is supportive of the principle stated in Policy T7 that strategic development sites must specifically identify any traffic impacts on the A64 arising from proposed development, individually and in combination with other strategic sites, and any mitigation including physical capacity enhancements required. These must be agreed with HE and neighbouring authorities as appropriate. • HE expect that the strategic sites located around the A1237 Northern Ring Road will combine to have a significant impact on the junctions of the A1237 with the A64 east and west of York. We will therefore need to have a good understanding of that cumulative impact and the scale and nature of any improvement required if we are to be able to state that the Plan is sound • The plan contains strong policy direction on sustainable transport. However, sustainable transport provision in isolation is insufficient to accommodate York’s development aspirations, and both demand management and physical capacity improvements will be required.
<p>National Federation of Gypsy and Traveller Liaison groups</p>	<ul style="list-style-type: none"> • Support the policy, asks that H5 (policy) specifically recognise that the requirement for pitches will be kept under regular review and ensure that sites remain available to travellers.
<p>York Travellers Trust</p>	<ul style="list-style-type: none"> • Considers that the Plan underestimates Gypsy and Traveller need, nor provides for sites in the green belt, and is not legally compliant with the 2010 Equality Act; • Suggests modifications, including: <ul style="list-style-type: none"> - Detailed changes to H5 to reflect higher levels of need; - Plan should identify specific sites or broad locations to accommodate Gypsy and Traveller housing need; - SS2 – should allow for safeguarded land, including for Gypsy and Traveller communities.
<p>Osbalwick Parish Council</p>	<ul style="list-style-type: none"> • Considers that the Plan uses of out-of-date mapping which does not properly show the extent of development boundaries (notably omitting Derwenthorpe); • Suggests modifications, including: <ul style="list-style-type: none"> - An Environmental Capacity Study should be

	<p>undertaken to support the Plan.</p> <ul style="list-style-type: none"> - ST4 should be removed from the Plan due to its elevated presence in open countryside, traffic concerns, open space and wildlife value; - ST7 should be removed from the Plan and retained as green belt in permanence; the site is important to the historic character and setting of the city, developers deem it unviable and there are significant environmental concerns; - ST15 should be promoted as a self sustaining new town; - ST27 must require the increase in student numbers to be accommodated on site in full to avoid further disruption to the housing market; similarly, H7 should require all HE establishments to accommodate student housing growth on campus; - H8 - reduction in the acceptability threshold percentages halved for both neighbourhood and street level thresholds; - Identify green burial site in Osbaldwick; - Clarify role of 'Streetscape Strategy and Guidance'.
Coal Authority	<ul style="list-style-type: none"> • No comments
York, North Yorkshire and East Riding Local Enterprise Partnership	<ul style="list-style-type: none"> • Considers the Plan to be Legally Compliant and generally sound, with the following issues: <ul style="list-style-type: none"> - The Plan should be advanced quickly to adopted, to enable at least the 867 per annum homes to be delivered; - ST5 York Central is an increasingly important site, and the increased planned target of 100,000sqm B1a office space is welcomed; - Welcome funding from West Yorkshire Combined Authority to dual the A1237.
Wheldrake Parish Council	<ul style="list-style-type: none"> • Residents feeling that their submissions with regards to the previous consultation period have not been taken into account; • Objection to site SS18 (ST33), as feel that would place an unacceptable and unjustifiable pressure on the current infrastructure and services. The proximity to the development to the industrial estate is also an issue. A significant proportion of ST33 is located on good quality agricultural land and also on green belt. • Objection to site SS13 (ST15) as the residents do not feel they have been properly consulted regarding their needs. • ST15 should be amended to reflect the developers viable, sustainable and ecologically friendly site option; • E8 should be removed from the plan or designated as green space within the village;

<p>NHS Property Services</p>	<ul style="list-style-type: none"> • Clifton Park Hospital Site could accommodate a mixed used scheme that could meet the identified need for additional housing sites in York. • The LP Housing Requirement, as the updated SHMA figures were rejected by CYC. PDLP provides 3,248 homes less than minimum calculated using government's standardised methodology. PDLP approach to dealing with housing shortfall is incorrect and unsound. • Placing Clifton Moor Hospital Site in Green Belt as sites does not perform any of Green Belt purposes set out in Paragraph 80 of NPPF. • If it is considered that additional housing sites are required to ensure an adequate supply for the Government's OAN, have submitted representations to put forward three sites for consideration as windfall sites. • Supports HW1, which seeks to protect existing community facilities. • Supports H1 - the consultation Plan identifies that CYC have five spatial principles. The redevelopment of land at Peppermint Court can be considered to be in line with these strategies. • Suggests modifications, including: <ul style="list-style-type: none"> - Should any part of the Peppermill Court, Cherry Tree House or Limetrees site be declared as surplus to the operational healthcare requirements of the NHS in the future, then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5 - 10 years. - Limetrees site does not contribute to the purposes of the green belt.
<p>Haxby Town Council</p>	<ul style="list-style-type: none"> • Considers the Plan to be Legally Compliant • Considers that ST9 should be deferred until the improvements to the A1237 have been completed. Notes other concerns re sewerage and drainage, school and health care provision, and impacts on landscape.
<p>National Grid</p>	<ul style="list-style-type: none"> • Considers that several sites cause the Plan to be unsound due to preferring that buildings are not built directly beneath its overhead lines due to occupiers of properties being in the vicinity of lines, and because National Grid needs quick and easy access to carry out maintenance. Sites that cross or in close proximity to National Grid infrastructure are ST1 -British Sugar/Manor School and ST7 - Land East of Metcalfe Lane.
<p>Fulford Parish Council</p>	<ul style="list-style-type: none"> • Considers the Plan to be Legally Compliant. • SS1 – that the Plan should set a target of 706 dwg/annum; • SS2/GB1 – green belt should not be set by using the

	<p>residual land once development needs have been accommodated. Should instead reflect NPPF;</p> <ul style="list-style-type: none"> • Delete ST15 – land provides an important green belt function, including the separation of Elvington from the main urban area; • Delete ST4 - land provides an important green belt function, and the presence of the University is being used to justify further development of open land; • Delete ST36 – site should be considered as part of the Plan’s review, as it is unlikely to start before the end of the Plan period; • Undue concentration of major development in the SE quadrant of the city. Cumulative impact of these proposals would cause harm to this area of the city. There would not only be a significant loss of open land and visual outlook but also greatly increased traffic congestion, traffic noise, air pollution and community severance; • Modifications to other Housing policies, including to H8 re HMO thresholds.
Network Rail	<ul style="list-style-type: none"> • Considers the Plan Legally Compliant. • Requests modifications to policies governing ST1 and ST2, to note site’s proximity to the Millfield Lane level crossing and the need to minimise new pedestrian, cycle and vehicular traffic because of the crossing’s high risk rating.
Huntington Parish Council	<ul style="list-style-type: none"> • Considers the Plan Legally Compliant and generally sound.
Earswick Parish Council	<ul style="list-style-type: none"> • Considers the Plan sound. • Supports SS1, particularly that no safeguarded land is allocated and that permanent green belt boundaries will be established; • ST35 – highlighting the potential for traffic impacts.
Strensall with Towthorpe Parish Council	<ul style="list-style-type: none"> • Considers the Plan is legally compliant and generally sound. • Supports Plan’s housing target, in preference to the overestimated DCLG target of 1070/annum; • Supports reduced housing target on ST35, but has concerns in particular regarding infrastructure requirements and site access; • ST9 should be removed from the Plan or its site significantly reduced given likely traffic and infrastructural impacts.
Elvington Parish Council	<ul style="list-style-type: none"> • General concern that the Plan does not reflect local public need. • ST15 – would support the site in its previous location, closer to the A64;

	<ul style="list-style-type: none"> • Development of H39 raises Green Belt issues; site should be deleted and replaced with H26 Dauby Lane; • Plan should uphold the Inspectors previous decision re SP1; • Conditional support for ST26 and E9
<p>Heslington Parish Council</p>	<ul style="list-style-type: none"> • Comments that the Plan is not legally compliant, as it is not clear the Council has provided the proof of “exceptional” circumstances to support green belt land releases. • Suggest that the University of York’s Campus East has the potential to provide all further identified university uses, by using the site more intensively, in preference to ST27; • Heslington Parish Council would welcome full and well-justified reasons as to why the development (ST27) has been put-forward as being necessary in the proposed location for further university uses that cannot be incorporated into the two existing campuses, particularly given the land’s green belt status; • HPC would like to see the cumulative traffic flow impacts from local proposed developments - ST15, ST27, H56 and the ST4 analysed by CYC/Developers to evidence that there will be no adverse traffic congestion for Hull Road, Field Lane, University Road and Heslington Lane. • There is no proof that mitigation can compensate for the impacts of ST15, including on productive farmed land of the best and most versatile arable land, infrastructure that will join already highly congested roads; pollution damage: water, air, soil, noise, light, increased footfall and pet predation, to these two highly sensitive areas and irreplaceable habitats. This is a “stand alone” site that requires extensive mitigation measures and infrastructure.
<p>Upper and Nether Poppleton Parish Councils</p>	<ul style="list-style-type: none"> • Raise a number of concerns relating to the soundness of the Plan. • The expansion of Northminster Business Park is too great, and not supported by the Neighbourhood Plan; • Poppleton Garden Centre should remain as an asset to the area; if the site is to be developed, the Parish Council’s only support development of the existing built footprint; • The Plan lacks an integrated Transport Strategy – questions the loss of proposed rail halt for York Business Park, and lack of discussion around cumulative impact of development on the transport network; • More evidence/assessment required to understand the cumulative impact of proposed development on the City’s historic character and setting, open space, education provision and natural environment;

	<ul style="list-style-type: none"> • SS2 does not properly describe the role of York’s green belt.
Internal Drainage Board	<ul style="list-style-type: none"> • Comments that the Plan is sound, subject to some specific comments around managing surface water drainage. The Board believes that, in an area where drainage problems could exist, development should not be allowed at any location until the Local Authority is satisfied that surface water drainage has been satisfactorily provided for. In addition the Board does not consider that development within Flood Zone 3 is desirable or sustainable in the longer term.
York Civic Trust	<ul style="list-style-type: none"> • Believes plan to be legally compliant. • Considers Plan to be unsound because: <ul style="list-style-type: none"> • No evidence to justify 15% target of journeys by public transport on new developments and no target offered for cycling and walking. • Transport policy statements in the draft Local Plan need to be justified. Suggests amendments. • References to future transport-related documentation makes it impossible to judge potential effectiveness. • Design standards and policy thresholds are not specified (To be set out in Supplementary Planning Document).As a result it is impossible to judge the potential effectiveness and soundness. • ST14 and ST15 may not comply with NPPF. • Inconsistencies with information provided regarding statutory consultees required for listed building consent applications, e.g. ‘English Heritage’ rather than ‘Historic England’. • Suggests various modifications to policies, such as T2, T4, T5, T8, DP2, DP3, ST14, D4, D5 and D7.

Table 2: Main Issues Raised by Adjacent Local Authorities

Local Authority	Main Issues Raised
Ryedale District Council	<p>Soundness</p> <ul style="list-style-type: none"> • No issues raised, support the housing sites proposed particularly those in the north of the city as they feel this provides more choice and will temper demand for new building in Ryedale. Having engaged directly with individual officers and through the North Yorkshire Development Plans Forum, Ryedale feel they have been suitably involved in the process. Pleased that there is consistency between the emerging Local Plan and the

	Ryedale Plan.
Selby District Council	<p>Soundness</p> <ul style="list-style-type: none"> Both Selby and York have agreed to meet their own objectively assessed housing need within their own authority boundaries. Will seek assurance through the examination that York is able to meet its own housing requirements.
Hambleton District Council	<p>Soundness</p> <ul style="list-style-type: none"> Satisfied that the plan is an appropriate response to the planning challenges of the city. Cross boundary issues relevant to Hambleton have been addressed in an appropriate manner and are not aware of any outstanding issues.
East Riding of Yorkshire Council	<p>Soundness</p> <ul style="list-style-type: none"> East Riding of Yorkshire supports reference made in policy T4 of the need for improvements to the A64/A1079/A166 Grimston Bar junction as this is a congested junction that impacts journeys to and from the East Riding. The need for mitigation measures has been identified in the East Riding Infrastructure Delivery Plan. <p>Modifications</p> <ul style="list-style-type: none"> Unclear whether (ST15 Land West of Elvington Lane) would be sufficient to deliver the necessary supporting infrastructure outlined in Policy SS13. Does not consider policy unsound but needs further clarification within the plan to outline how this strategic allocation will be delivered, including provision of services. Infrastructure Delivery Plan is unclear whether all costs (A64 grade separated junction, new bus service, doctors, school etc.) have been established and considered through the Local Plan and CIL Viability Assessment in determining whether the scale of development proposed would generate sufficient developer contributions to deliver the required infrastructure. Costs of the services have not been clarified in other policies. Suggests it may be helpful to include viability of essential infrastructure and the costs and mechanisms (beyond developer contributions alone) for securing funding.
Harrogate Borough Council	<p>Legal Compliance</p> <ul style="list-style-type: none"> HBC is planning to deliver a step change in housing delivery in order to meet in full its objectively assessed need. It is not making provision to deal with undersupply elsewhere; Given that there is agreement amongst the Leeds City Region and North Yorkshire Authorities that each will plan to meet their housing needs within their own Local Authority boundaries there remains concerns over the

	longevity of York's proposed green belt boundary.
North Yorkshire County Council	<p>Soundness</p> <ul style="list-style-type: none"> • Welcome commitment in SS1 to development not leading to environmental problems and transport congestion for neighbouring authorities; • Note that the plan whilst delivering higher housing numbers than has been achieved over the last 10 years, it does not make any additional uplift to the OAN for market signals; • If Green Belt boundary is too inflexible may result in pressure for growth on areas in NY. Want to avoid this to avoid adverse effects on NY infrastructure and services; • Plan needs sufficient provision of safeguarded land to meet future needs beyond the plan period and ensure that the green belt boundary is permanent; • Detailed minerals and waste policies are contained in the Minerals and Waste Joint Plan. Any policies in the York Local Plan must ensure that they are consistent with strategic policies in the MWJP; • Various comments from NYCC on their Strategic Transport Prospectus for North Yorkshire. As the NYCC functions as the Local Highways Authority it is keen to ensure that York's Local Plan takes account of the traffic generated by the allocations of surrounding planning authorities, particularly Harrogate district and the Green Hammerton settlement, and that committed developments within North Yorkshire are included that will impact on cross border issues.

Table 3: Main issues Raised about the SA/SEA

Site/Policy Reference	Main Issues Raised
General Comments	<ul style="list-style-type: none"> • Support and agreement with City of York Council processes, procedures and justification; • SA methodology and analysis of alternative sites is flawed in respect of its treatment of Green Belt issues; • Contrary to Wildlife and Countryside Act 1981 - it is disturbing protected species and/or destroying their resting places and/or breeding grounds; • Contrary to the Natural Environment and Rural Communities Act 2006, section 40, to conserve biodiversity; • Justification required of policy choices in relation to results of SA and why policies have been rejected or progressed; • The plan strikes the right balance between providing the homes and jobs York needs while protecting the greenbelt & historic character and setting of the city. General Support expressed;

	<ul style="list-style-type: none"> • Not compliant with NPPF Para 112. No ranking of land hierarchy in Green Belt; • Transportation issues: no new bus services to serve developments, address inward commutes, limited work in reducing need to travel, roads, air quality and 'i-travel York' needs extending more widely; • SA Indicators Obj 6 should be amended to include key local indicators that monitor sustainable travel behaviour and access to public transport services year on year.
SS1	<ul style="list-style-type: none"> • Housing figure too low. Concerned about the backlog. Failure to meet housing need has direct and negative impact on the economy.
SS2	<ul style="list-style-type: none"> • SA Criteria 1 – 4 does not include Green Belt, no justification of why all sites must score 22 and not all criteria of same importance; • Lack of clarity, definition and consistency in the application of Green Belt policy within the SA process; • Green Belt policy has been inappropriately subsumed and considered in an inadequate and inconsistent way in the SA, under the wider and less well defined (than Green Belt) concept of landscape protection.
SS10	<ul style="list-style-type: none"> • Review of SA for the proposed allocation and the alternative boundaries that have been put forward raises questions over the proposed boundary of ST8; • This site should form part of alternative site 914 as together these sites would naturally extend Huntington with the A1237 providing a strong defensible boundary.
SS11	<ul style="list-style-type: none"> • Overwhelming of local infrastructure, congestion and pollution. Sustainability not addressed in the plan; • Reduce the scale of the development, provide additional amenities, re-open Haxby railway station and increase bus services.
SS12	<ul style="list-style-type: none"> • Significant change in Sustainability Appraisal Scoring between Preferred Sites and Pre-publication consultations. ST14 not sustainably appropriate to take forward for allocation.
SS13	<ul style="list-style-type: none"> • Flaw in SA scoring system due to lack of local services near site; • Potential to disturb wildlife; • Creation of new infrastructure across virgin arable land is clearly contrary to the SA parameters for land use; • Full ecological survey undertaken; • All access to be via proposed new roadways; • Identify and justify loss of Green Belt land.
SS18	<ul style="list-style-type: none"> • Each SA objective inappropriately assessed for this site; • Remove site from plan, not suitable for development.
SS19	<ul style="list-style-type: none"> • Suggest changes in scoring for Objectives 9 and 13.
SS20	<ul style="list-style-type: none"> • Suggest changes in scoring for Objectives 6, 9 and 13.
ST9	<ul style="list-style-type: none"> • Issues with surface water drainage, impact on existing infrastructure, air pollution and quality of life;

	<ul style="list-style-type: none"> • Development should be focussed around Poppleton, not Haxby, due to greater infrastructure. Development in Haxby must see school expansion alongside road and drainage capacity improvements.
ST15	<ul style="list-style-type: none"> • Issues with existing infrastructure, HGV traffic, wildlife and housing affordability; • Contrary to NPPF: environment, pollution, land environmental value and ecological surveys; • SA08 & SA09: issues raised; • Mitigation measure needs to occur 5 years before commencement, not 4 years; • Clearly identify number of hectares of Green Belt arable land required; • Pedestrian and cyclist access should run alongside vehicular access; • Full ecological survey undertaken; • Consideration on how to protect Grimston Wood.
ST33	<ul style="list-style-type: none"> • Infrastructure cannot cope with development and primary school needs expanding.
T2	<ul style="list-style-type: none"> • Insufficient operating centre opportunity to support bus or coach operations, either on new sites or by utilising or expanding upon existing operating centres; • Where existing operating facilities are situated, local planning policy appears to oppose the development, expansion or improvement of existing depot facilities with significant issues in gaining planning consent; • Current land classification and insufficient appropriate site opportunities coupled with increasing land costs result in a significant barrier to any potential new operating centre, either for incumbent or new operators to the York bus and coach market;
H1	<ul style="list-style-type: none"> • Site ST7: Alternative Site Size proposed: Option A: 845 houses in an area of 43.53ha, 60% net developable area 26.4Ha at 32dph; • Option 2. 945 houses on an area of 43.53Ha, 70% net developable area - 30.47 Ha net site area at 32dph; • Option 3: 1,225 Homes on an area of 57.27 Ha, 70% net developable area – 40.1 Ha net site area at 32dph.
H39	<ul style="list-style-type: none"> • Issues with Green Belt Assessments and SA Appendix J for site, inconsistencies in criteria and conclusions; • Development will have large effect on openness of landscape but will only make small contribution to housing target; • No settled Green Belt Policies undermines SA conclusions and that site is suitable for development; • H39 more acceptable than ST15.
H54	<ul style="list-style-type: none"> • Issues with building on Green Belt, wildlife habitats, capability of existing infrastructure, congestion and impact on quality of life.
H56	<ul style="list-style-type: none"> • Object to SA for site. HIA violating criteria 3 and 6. Lack of

	SEA.
H59	<ul style="list-style-type: none"> • Suggest changes in scoring for Objectives 5, 6 and 13
E18	<ul style="list-style-type: none"> • Open grassland enhances approach to village, makes industrial estate less intrusive and acts as village green. Building would degrade village.
E8	<ul style="list-style-type: none"> • Suggest changes in scoring for Objectives 3, 5, 6, 8 and 15.

Table 4: Main issues Raised in Plan Order

Main Issues Raised	
General Comments	
General Comments	<ul style="list-style-type: none"> • Many comments bring up the need for appropriate infrastructure prior to development across the whole of York in general, particularly the roads; • On the whole, respondents stated that the Plan was Legally Compliant but then made comments about specific areas of the Plan, namely site allocations; • Many comments support the plan as a whole stating that it meets the needs of the people in York, preserves green belt, heritage, villages; • Some comments state that the plan is not sound or legally compliant as it does not comply with elements of the NPPF and that the evidence base is not adequate.
Section 3: Spatial Strategy	
SS1: Delivering Sustainable Growth for York	<p><i>Spatial approach</i></p> <ul style="list-style-type: none"> • Several respondents noted that it appears that the Council’s strategy is a combination of urban expansion, isolated new settlements and restricted growth in existing settlements, but no explanation why this is the chosen approach. Meanwhile some respondents stated that each settlement should have a degree of growth / housing sites, whilst one developer noted that the Spatial Strategy should allocate most of its land within the Ring Road. • Meadlands Residents Association stated that the Plan needs an Environmental Capacity Study undertaking, to protect the City’s special character (as previously requested by English Heritage). • Historic England stated that in order to achieve sustainable growth in terms of York’s environmental assets, it is important that not only the location of growth safeguard these assets, but also the scale of growth proposed in each area. They also stated that there was no clear justification for the two new settlements proposed in the Plan. • Fulford Parish Council noted that the Green Belt proposed in the Plan is the residual of land not required for development during the Plan period – this is the wrong approach for a historic City of National and International importance. Meanwhile some respondents supported the Green Belt boundary as proposed. • Some respondents stated that the Council needs to be more proactive in bringing brownfield sites forward before greenfield

	<p>sites.</p> <ul style="list-style-type: none"> • Rachael Maskell MP and York Labour Party had concerns that the Plan's Strategy fails to deliver prosperity for all, solve the housing crisis, accommodate needed workforce and address transport and pollution issues. <p><i>Housing targets and figures</i></p> <ul style="list-style-type: none"> • Whilst some respondents support the overall housing growth figures, many of the respondents (including the majority of Developers & landowners and Rachael Maskell & York Labour Party) were concerned that the Council was using an annual housing target (867), which was too low and didn't reflect the Council's own evidence base or officers recommendations, market signals and wasn't in line with NPPF or the Government's published methodology, which sets an annual target of 1070 for York. Consequently, they considered that the Plan would be found unsound. • However, consequently a number of respondents believed that even 867 was too high, and should be 706 per annum or even less. Meanwhile, some respondents (including some Councillors and Parish Councils) supported the starting figure of 867 per annum. • The North Yorks Branch of the CPRE had concerns regarding the achievability of delivering a minimum annual provision of 867 dwellings per annum over the Plan period. • Several developers stated that York has a poor historic delivery rate for new homes and the Plan is reliant on a small number of relatively large sites coming forward early on in the process with high levels of delivery – this is unrealistic given lead-in times & potential masterplanning issues. Large sites provide too much risk, it is preferable to provide more smaller allocations to meet the annual figure. • It was noted that the existing housing backlog is incorrectly calculated using student accommodation. • The York, North Yorkshire and East Riding Local Enterprise Partnership stated that it is important that the Local Plan is progressed as quickly as possible to ensure that the proposed sites are brought forward to achieve the minimum of 867 dwellings per annum and also any additional homes. Additional reserve sites would also help achieve this. • A number of developers stated that phasing should be removed from the allocations as new homes are needed now. • The Home Builders Federation was concerned that the housing figures did not match the proposed employment growth figures in the Plan or the LEP. • Some respondents had concerns that the annual housing target of 867 uses the wrong population growth assumptions. • A number of respondents including developers questioned the historic windfalls being included in the Plan.
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	<ul style="list-style-type: none"> • Several respondents including developers stated that the Council cannot provide a 5 year housing supply. <i>Plan period</i> • A number of developers noted that the Plan period should be April 2017 to 31st March 2038. The housing allocations only partly extend beyond 2033. The Plan fails to justify the 2038 end date with the allocations as presented in the Trajectory demonstrating these shortcomings. Land is being brought forward without a policy framework. <i>Safeguarded Land</i> • A number of respondents, including some developers argued that safeguarded land should be allocated in the Local Plan to help ensure a permanent Green Belt boundary beyond the end of the Plan period. Conversely, some respondents agreed that safeguarded land should not be included in the Plan. <i>Employment Land issues</i> • It is unclear as to which forecast has been used for employment figures and how these relate to the Leeds City Region and Northern Powerhouse. • It was noted by one respondent that the Plan only allocates 34ha of employment land over the 15 year Plan period plus an additional 5ha for the period 2033 to 2038, and 57ha of strategic employment land (inc 10ha at Autohorn, Wigginton Rd), and 21ha at the University of York (most of which is landscaping). Some respondents stated that the employment figure needs to be reviewed in light of the need for additional housing. • The York Labour Party and Rachael Maskell noted that the Plan incorrectly analyses and addresses employment issues, allocation of office space, City Centre congestion and employment. • Some respondents noted that a lack of commitment to early delivery of office accommodation is unsound, especially given losses to ORCS. <i>Infrastructure and Transport issues</i> • Some respondents including Julian Sturdy MP stated that the infrastructure could not cope with the proposed allocations, especially in the northern part of the City, where the A1237 is a severe restriction in terms of the infrastructure. • Rachael Maskell MP and York Labour Party stated that the Plan needs an efficient transport network to underpin the Plan's Spatial Strategy / Transport policies are not grounded in comprehensive analysis. • It was noted by a Councillor that a 30% increase in travel time across the network and 55% increase in congestion and associated implications is not acceptable. <i>Other issues</i> • It was suggested by one respondent that the Plan fails to
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	<p>reflect the cross boundary needs of adjacent local authorities and that any delays could impact on adjacent local authorities.</p> <ul style="list-style-type: none"> • Many residents support the principle of a Plan establishing a permanent Green Belt boundary and the approach taken in removing identified areas of safeguarded land from the Plan. Planning agents and developers argue that the boundary is too tightly drawn and will not endure beyond the plan period, ie not provide permanence. They further comment that the Plan is overly reliant on development from a few strategic sites (notably York Central) which may not deliver as anticipated.
<p>SS2: The Role of York's Green Belt</p>	<ul style="list-style-type: none"> • Many residents support the principle of a Plan establishing a permanent Green Belt boundary and the approach taken in removing identified areas of safeguarded land from the Plan. Planning agents and developers argue that the boundary is too tightly drawn and will not endure beyond the plan period, ie not provide permanence. They further comment that the Plan is overly reliant on development from a few strategic sites (notably York Central) which may not deliver as anticipated. • Many developers and landowners as well as other specific bodies including the York Travellers Trust and North Yorkshire County Council feel that the policy should include the provision of safeguarded land and that the omission of this undermines the plan. Others feel that the concept of sustainable urban extensions should be reintroduced to address housing shortfall. • The Home Builders Federation and the majority of developers recommend that the plan period be extended beyond 2038 and an additional 20% buffer is provided in relation to allocations to provide flexibility. • Some of the respondents believe that the Green Belt boundary is irregular, is not defined by physical features on the ground and is merely a 'broad brushing' of green space. Some argue that a 6 mile boundary of the Green Belt does not follow logic as the proximity of rural agricultural land is, in certain areas, much closer to the urban area of York. • Many landowners and developers request that various sites and parcels of land are removed from the Green Belt as they do not consider that they perform some, or in most cases all, of the functions of Green Belt specified in the NPPF. In addition, several respondents raised concerns about the robustness of the Green Belt evidence base. • Many of the respondents including Historic England and several developers feel that the end date of the Plan needs reviewing and that assurance should be provided that the Green Belt boundaries can endure beyond the end of the plan period.

	<ul style="list-style-type: none"> • Historic England believes that the policy needs to more closely reflect the requirements set out in SI2013 No.117, as at present there is no reference to Historic Character. They also believe that the first paragraph of the policy should be amended to include ‘...to safeguard the special character and setting of the historic city of York..’ • Several respondents including Julian Sturdy MP praised CYC’s work on decreasing the number of developments in the Green Belt. Whilst others are concerned that the Plan is not clear that Green Belt boundaries are being defined for the first time as opposed to being altered.
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**SS3 – York City Centre
Summary of main issues raised**

Legal Compliance

No specific comments were made on the Plan’s Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Historic England** and **The Theatre Trust** considers the Policy sound.
- **Cllr Denise Craghill of York Green Party** is supportive but suggests the last sentence should say ‘class A1’ rather than ‘class A’ to protect city centre retail diversity.
- Plan requires minor modification to reinforce support of Minster and ensure clarity on support of Minster Master Plan as an SPD.

Respondents that consider the plan sound in regards to this site:

- **York Labour Party (Harry Thornton and Rachael Maskell)** comment that the policy fails to reflect third party evidence and needs commitment to extending footstreets and upgrading public realm. Adds further improvements to York City Centre need to be made due to transportation and congestion issues.
- **YEF Transport Group** suggests the policy needs emphasis on the need for extending and upgrading the area covered by footstreets, their operating hours and removing traffic from them.
- **Hungate (York) Regeneration Ltd** comments that there should be an emphasis on the scope of the city centre to deliver more homes. Should be amended for flexibility.

Modifications

Proposed modifications include:

- Plan requires minor modification to reinforce support of Minster and ensure

- clarity on support of Minster Master Plan as an SPD. Suggested wording.
- **YEF Transport Group** and **York Labour Party (Harry Thornton and Rachael Maskell)** suggest redrafts to reflect points made in relation to soundness.
 - **Hungate (York) Regeneration Ltd** suggest to update the policy to clarify the figure for dwellings is flexible and to increase numbers where appropriate, and to provide clarification as to which elements of the Hungate scheme the 328 dwellings/ phase 5+ relates to and how this has been calculated.
 - **Cllr Denise Craghill of York Green Party** is supportive but suggests on last sentence should say 'class A1' rather than 'class A' to protect city centre retail diversity.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

SS4 (ST5) – York Central Summary of main issues raised

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this site:

- **York Central Partnership** believes the policy is legally compliant and has been prepared in accordance with the Duty to Co-operate.
- No assessment has been made of the impact proposed developments will have on the already heavily congested road network.
- The road safety implications have not been considered.
- Insufficient consultation on the figures used for housing and employment.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Hungate (York) Regeneration Ltd.** Support an increase in dwelling numbers on site and believe that the Hungate site should have expected capacity increased.
- **Homes England** support Policy SS4 and the allocation of York Central for housing and employment uses.
- **York Central Partnership** is progressing in the development and providing necessary infrastructure to ensure that the site can be delivered to its full potential. Confirmation of anticipated delivery of over 1,700 homes and a total of approx 100,000 sq.m. of commercial uses.

- **York, North Yorkshire and East Riding Local Enterprise Partnership** welcomes the Plan's increased office space target and states that the Plan already has significant financial backing; LEP Enterprise Zone status will provide approx £100m in retained business rates and ensure significant investment is available to address infrastructure challenges.

Respondents that consider the plan unsound in regards to this site:

- **Historic England** is concerned about the impact the development would have on the city's heritage. They state that nothing provided as part of the evidence base demonstrates that the site is capable of accommodating 2,500 dwellings and 100,000 sq. m. of office space in a manner which would not result in a form of development which would not have an adverse impact on the centre of the city. Furthermore, they are concerned as to whether development is achievable in a manner consistent with criterion iii, v, vi, vii.
- **Nether Poppleton Parish Council** state that the Plan is unsound as no consideration is given for a transport hub (train/bus interchange possibility). They suggest that if offices are being considered here then other out of town sites should be reduced.
- **KCS Development Ltd., LLP, GM Ward Trust, Curry & Hudson, K Hudson, C Bowes, E Crocker, Taylor Wimpey UK Ltd., Redrow Homes and Linden Homes** have expressed concern that there is an over-reliance on delivery of the York Central Site and highlights that the site has a long history of non-delivery. Furthermore, they have take issue with amount of residential development envisaged.
- **York Environment Forum** says there is an overestimation of the amount of land available for development due to site constraints and existing users' requirements.
- **Barratt Homes and David Wilson Homes** are concerned about the deliverability of the quantum of development anticipated by CYC across site and plan period and object to the number of houses proposed. They also state that SS4 contradicts the housing densities set out in Policy H2 and that the development of buildings up to 14 storeys are likely to have an adverse impact on historic urban fabric of the city.

Furthermore, the requirement to deliver 2,500 dwellings in York Central would require one and two bedroom apartments at very high density, which will hamper delivery of family houses. The respondent considers site to be able to deliver a maximum total of 1,210 units made up of 250 townhouses and 960 apartments.

- **YEF Transport Group** say that current transport proposals are not sufficient or reflective of the emerging Master plan for the site.
- **Oakgate Caddick Groups** believes that the Plan overly favours ST5 in terms

of office space allocations, which reduces choice available and carries uncertain timescales. They also question the soundness of the Employment Land Review, suggesting flaws with the scoring framework and relative weighting of the sites.

- **York Quality Bus Partnership** state that if traffic is mismanaged, there is a risk that development could place significant traffic on York's Inner Ring Road and other city centre roads, resulting in slow and unreliable bus journey times through central York.
- **Directions Planning** say that a reduction in housing numbers to be delivered on site in the post-plan period whilst then increasing the overall site capacity seems to make an expectation that delivery will be compressed into a shorter time frame – question achievability due to known constraints. Furthermore, they are concerned how additional development is to be achieved due to the being landlocked, limited in scale, and financial issues.
- **York and North Yorkshire Chamber of Commerce Property Forum** notes the over-reliance of this site and believes it should be treated as windfall. They also make reference to the developable area being less than 35ha.
- **Linden Homes Strategic Land, Shepherd Property Group, PJ Procter, and Strata Homes Ltd.** state that there is no current developer interest and insufficient evidence to demonstrate that the site is suitable for proposed scale and type of development.
- **The Retreat Living Ltd. and Gallagher Estates** believes that the suggested yield includes an unreasonably broad range spanning 850 dwellings and that the current proposed dwelling numbers represent a lack of clear understanding of true site potential.
- **Northminster Business Park and W Birch & Sons** believe it questionable how the additional development is to be achieved, given that the site is landlocked and limited in scale (only 35ha of developable land).
- **Avant Homes** state that the site has long history of non-delivery and envisage less development on this site to occur.

Other comments included:

- Potential loss of the Railway Institute as a regionally important sporting facility seems to contradict policies on sporting facilities and ambitions to promote healthy lifestyles.
- Increase in number of dwellings and employment floor space made without proper local consultation and increase will have severe negative impact on local community.
- Support of promotion and protection of theatres.
- Traffic and air pollution concerns.

- Permitted Uses and Principles of Development do not agree with each other.

Modifications

Proposed modifications include:

- **Historic England** want the evidence base to demonstrate that the volume of development proposed will not harm the setting of heritage assets in its vicinity or those elements identified in the Heritage Topic Paper. Additionally, mitigation of infrastructure and air pollution must be demonstrated and the impact of development of this site upon SA014 and SA06 need to be amended to “uncertain” and “negative”, respectively.
- **York Labour Party** and **YEF Transport Group** want the Policy to be redrafted.
- **York Green Party** suggests that second para. Delete bullet point. Development principles – add new xiv) ‘A transport plan for the site must demonstrate how a maximum of 10% of journeys to, from, through or within the site by private car will be achieved.
- Amend SS4 map to include all of the green space around Clifford’s Tower as amenity green space.
- **The Education and Skills Funding Agency** believe that land should be safeguarded for the provision of schools.
- **Linden Homes Strategic Land, Shepherd Property Group, PJ Procter** and **Strata Homes Ltd.** suggest that the level of housing delivery in the plan period for the site should be 410 units.

Other modifications include:

- If Railway Institute must be demolished, then a sporting facility at least as good if not better should be built to replace it.
- Restore original allocation of 1,500 dwellings and 60,000 sq. m. of office floor space.
- Reduce number of houses proposed on site.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

Legal Compliance

No specific comments were made on the Plan's Legal compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Historic England** is broadly supportive of this policy/development plans for the area, requests mostly minor amendments. Most significant suggested alteration is that Castle Mills be used for residential development not car parking.

Respondents that consider the plan unsound in regards to this site:

- **Environment Agency** does not consider the Foss Basin an appropriate location for development and would not support any development with the possible exception of water compatible uses, subject to detail. Given the area's importance for flood storage and the operation of both the Foss Barrier and Castle Mills Sluice the EA do not consider it appropriate to include the Foss Basin within the ST20 site allocation and that the Local Plan should not be adopted with this allocation included.
- **Environment Agency** have no objection in principle to developing a multi-storey car park on the existing St George's field car park, however it is important any applications are in line with policy ENV4, it is clearly demonstrated there would be no loss of flood storage and that no flood flow routes be altered or displaced onto others. Would not support any development that results in increased flood vulnerability classification at this location.
- **York Green Party, Councillor D'Agorne, Councillor Dave Taylor** and a few local residents note that the area where the Clifford's Tower visitor centre is proposed is no longer designated as open space on the policies map, they stress that full procedures (Council must advertise it is disposing of the land in line with Local Government Act 1972 Section 123 (2A)) must be followed before this can be changed. The map should still show open space, at least until the current appeal is completed.
- **Nether Poppleton Parish Council** strongly objects to proposals for a multi-storey car park at St George's Field. Policy mentions reducing car use and promoting sustainable transport but then makes this proposal which is a complete contradiction. This space should be re-developed or used to provide more open space in the city centre.
- **Upper Poppleton Parish Council** support removal of the castle car park and re-development to create new / enhanced public space. Out of centre parking should be encouraged at park and rides, along with redevelopment this will help reduce air pollution. The contradiction between stated aims of promoting sustainable transport whilst simultaneously planning a replacement car park is

noted.

- **York Environment Forum Transport** Group stress that transport proposals in this policy are necessary but not sufficient or reflective of the emerging master plan for the site.
- One local resident considers the plan unsound as the provision of a multi-storey car park at St George's Field is unacceptable and is a complete change of policy since the last draft was available to comment on. Also considers that The Castle and Eye of York proposal would radically impact the open space as setting for Clifford's Tower and is therefore unacceptable.

Modifications

Proposed modifications include:

- **Historic England** notes that there are two car parks proposed at ix and xvii (Castle Mills and St George's Field), the former should be used for residential development instead. Criterion xi be amended to read "... historic assets and their setting" and criterion xvii be amended to read "... sightlines to, from and across the Castle Gateway". A reference should be added to state the opportunity of Castle and the Eye of York to improve access to the museums.
- **York Green Party, Councillor D'Agorne, Councillor Dave Taylor**, and a few local residents stress that after the current appeal is completed the council must still comply with Local Government Act 1972 Section 123 (2A). Similarly a few local residents request a public consultation on the Clifford's Tower visitor centre before the plan is approved.
- **York Environment Forum Transport Group** request the policy is redrafted to reflect emerging site masterplan, suggest numerous references that should be added.
- **Nether Poppleton Parish Council** request the proposals for a multi-storey car park at St George's Field be removed and the area be redeveloped or used to create more city centre open space.
- One local resident requests references to / proposals for St George's Field and Piccadilly be removed from the policy.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

Legal Compliance

No specific comments were made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Nether Poppleton Parish Council** support for development to take place, providing loss of playing fields is replaced and Green Infrastructure is preserved.
- **Airedon Planning and Design** has a positive appraisal of ST1.
- **British Sugar** support CYC aspirations to secure 20% affordable housing and a tenure split of 70:30 for social rent and discount sale dwellings alongside a pepper potting of affordable housing throughout the site.

Respondents that consider the plan unsound in regards to this site:

- **British Sugar** CIL must be related to the development itself and the referencing to serving needs of the surrounding communities is not justified or consistent with national policy.
- No reference by CYC of the need to phase development around life cycle of bees and wasps as it is unjustified and unnecessary – wording should be deleted from Para. 3.41.
- It has not been at any point proposed or required, following discussions with CYC, that provision to be made for plots to be available for self builders – requirement is not justified.
- It has not been at any point proposed or required, following discussions with CYC that provision is made for gypsies and travellers – requirement is not justified.
- Site will provide range of family housing and therefore accommodation for older persons, therefore it is not appropriate that Policy H9 stipulates for that specific older persons specialist housing should be provided.
- Find current proposal of no more than two affordable homes placed next to each other to be too prescriptive.
- The provision of new community facilities serving the needs of existing occupiers is not justified or consistent with national policy.
- Policy D3 – Cultural Provision: A cultural wellbeing plan was not requested or required as part of the pre-application consultation exercise.
- In order to be justified, Policy GI4 should recognise that mature landscaping be retained wherever possible in the context of the necessary infrastructure provisions for future development.
- Policy GI5 contains no definition of the words 'area of benefit' – this needs to be clarified.
- The provision of new open space provision serving the needs of existing occupiers is not justified or consistent with national policy.
- Policy ENV2 – should be consistent in its tests for level of impact that is

acceptable in accordance with NPPF and the wording in the policy.

- Policy ENV4 – Policy wording should be clarified to ensure that it makes clear that only increases in flood risk arising as a result of development will need to be mitigated for.
- Policy DM1 – CYC must ensure in accordance with the NPPF that the requirement for funding strategic infrastructure on developers does not hamper the viability and deliverability of key strategic sites. Policy should include specific reference to contributions being in accordance with the requirements of CIL Regulation 122.
- **Nether Poppleton Parish Council** believe the need to preserve greenspace should be written in the policy. They also say that there has been no mention of preservation of mature trees or of increasing provision for secondary and tertiary education and lack of provision will increase the need for transport and car journeys. Furthermore, they take issue with placing access near Millfield Lane level crossing and believe in the need for provision for elderly and young people starter homes.
- **York Environment Forum** believes the scheme has no affordable housing on the basis of high remediation costs. No costs to justify this and the scheme could have higher density.
- **The Retreat Living Ltd.** and **Gallagher Estates** say the suggested dwelling yield of 1,200 includes a significant degree of over-optimism. Reports (2017) refer to “up to 1,100 dwellings” and also 2018 Design and Access Statement suggests “675 units up to maximum of 1,076 units”.

Other comments relating to unsoundness include:

- If ST1 and ST2 are developed at the same time, it is difficult to see how the necessary infrastructure/sports and education facilities for both will be provided.
- Valuable area of Green Belt.
- Separates York and Poppleton.
- ST1 only allows for 3% affordable housing, contrary to policy SS6.
- Level of housing proposed is at very high risk of causing environmental damage through the increase of road traffic leading to air pollution.

Modifications

Proposed modifications include:

- **Network Rail** suggests minimising new pedestrian, cycle and vehicular traffic because of the crossing’s high risk rating.
- **British Sugar** state that the site should be master planned and be deliverable to provide new social infrastructure to serve the needs of the new community including local retail and health, community space, educational facilities and sports provision.

- Delete from Para 3.41 ‘this may include phasing development around the site to correspond to the life cycle of species’.
- Policy H4: suggest change to wording – On strategic sites (other than ST1) (Site 5 hectares and above) developers will be required to supply at least 5% of dwelling plots for sale to self builders or to small/custom house builders subject to appropriate demand being identified.
- Policy H5: suggest change to wording – Larger developments (5 hectares or more) will be required (i) provide a number of pitches within the site; or (ii) provide alternative land that meets criteria set out in Part D (of this policy) to accommodate the required number of pitches; or (iii) provide commuted sum payments to contribute to development of pitches elsewhere.
- Policy H9: suggest change to wording - Larger developments (5 hectares or more) should incorporate the appropriate provision of accommodation types for older persons within their site master plan.
- Policy H10: suggest change to wording – fully integrate the affordable housing by pepper potting throughout the development with no more than four affordable dwellings placed next to each other. Mix of homes should take into account assessment of local needs. Affordable housing should be visibly indistinguishable from open market dwellings.
- Policy HW2: suggest change to wording – ‘development that places additional demands on existing services will be required to provide proportionate new or expanded community facilities to meet the needs of future occupiers’.
- Policy GI4: suggest change to wording – ‘development will be supported where it provides protection for overall tree cover as well as for existing trees worthy of retention wherever possible in the immediate or long term, and with conditions that would sustain the trees in good health and maturity’.
- Policy GI5: suggest change to wording – allow appropriate timescales for the provision of off-site facilities agreed via S106 agreement.
- Policy GI6: delete wording – ‘where there are deficiencies in certain types of open space provision in the area surrounding a proposed development the Council will seek variations in the component elements to be provided by the developer in order to overcome them’.
- Policy ENV2: proposals for uses that are likely to have an environmental impact on the amenity of the surrounding area including residential amenity, open countryside, local character and distinctiveness, and open spaces must be accompanied by evidence that the impacts have been evaluated and the proposal will not result in significant adverse environmental impacts, giving rise to loss of character, amenity or damage to human health, to either existing or new communities.
- Policy ENV4: where proposed development is shown to be at risk of flooding or is shown to increase flooding elsewhere in the catchment, development will only be permitted when the local planning authority is satisfied that increases in flood risk as a result of the proposed development, will be successfully managed and there are details of proposed necessary mitigation measures.
- Policy DM1: New development will not be permitted unless the infrastructure required to service the development is available and the necessary infrastructure to meet the local and wider strategic demand generated by the development can be provided and co-ordinated.

Other modifications include:

- Secondary education expansion is required.
- Reduce number of houses to be built on site.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

SS7 (ST2) – Civil Service Sports Ground

Summary of main issues raised

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Nether Poppleton Parish Council** state that the site was previously removed by inspector of Upper and Nether Poppleton Neighbourhood Plan based on that it is a Green Belt site from the reserved regional spatial strategy RSS.
- **Airedon Planning and Design** has a positive appraisal of SS7
- **Historic England** considers that the policy is sound and welcome the requirement that development be set back from A59 and mature trees retained.
- **Miller Homes** say that the site allocated for development in Poppleton Neighbourhood Plan, not included following comments from inspector that allocations and the definition of the Green Belt should be a strategic matter for the Local Plan.

Respondents that consider the plan unsound in regards to this site:

- Loss of Green Belt not in York's best interests and local infrastructure cannot support development.
- Site should be retained to provide recreational/sports facilities.
- Queries as to where education facilities will be sited.
- Traffic and congestion issues.
- No objective assessment of where housing should be located.
- Not consistent with NPPF
- Important at maintaining between York and Poppleton.

Modifications

Proposed modifications include:

- **Network Rail** state that the site's proximity to the Millfield Lane Level crossing requires need to minimise new pedestrian, cycle and vehicular traffic because of crossing's high risk rating.
- **Miller Homes** believe the site should be referred to as the former Civil Service Sports Ground and Adjoining Land and that off site sports provision is proposed in order to make effective use of the site and support other sports sites nearby.

Other modifications include:

- Remove allocation from the plan.
- Site should be retained to provide recreational/sports facilities.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

SS8 (ST4) – Land Adjacent to Hull Road

Summary of main issues raised

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Historic England** comments that there is no objection but site ST27 needs to be considered with the future needs of the university and the impact on York's special character and suggests this site (ST4) as an alternative. Welcomes principle on protecting important views.
- **Persimmon Homes** supports allocation but suggests the site has a capacity of 240 instead of the listed 211. Have completed the site viability form to support.

Respondents that consider the plan unsound in regards to this site / policy:

- **Fulford Parish Council** objects due to undue concentration of major development in the SE quadrant of the city. Would increase traffic and air

pollution.

- **Osballdwick Parish Council** objects to development due to area being an important green route between the green belt and urban area. Has open space and wildlife value and would cause drainage and traffic issues.

Modifications

Proposed modifications include:

- **Historic England** suggests that ST27 should be reduced in size in order to reduce harm on the special character to enable use of this site (ST4) as an alternative.
- **Fulford Parish Council** considers that the proposal should be deleted due to increasing urbanisation of SE quadrant of city. Objects to the development on open and green field land.
- **Osballdwick Parish Council** suggests the removal of the site from the plan.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

SS9 (ST7) – Land East of Metcalfe Lane

Summary of main issues raised

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **Historic England** state that the proposal will harm key elements identified in the Heritage Topic Paper. They also state that the location is out of keeping with current pattern of development and that development needs to be pulled away from the ring road. They conclude by saying that the location will, in effect, create a new freestanding settlement.
- **Persimmon Homes** supports proposed allocation of housing but objects to site boundaries and that the approach undertaken for allocation is counter to objectives of plan, does not create good urban form, not sustainable and an inefficient use of land.
- **Barratt Homes and David Wilson Homes** supports the allocation but have

concerns regarding boundary as it has been previously demonstrated that the site can hold additional units.

- **Cllr Roger Bedford** says the map does not show all occupied housing development in Osbaldwick.
- **York Environment Forum** say access to services would require major infrastructure investment and would have a significant impact on transport. They also believe that the site is not large enough to support adequate social provision.
- **Education and Skills Funding Agency** say that the land should be safeguarded for the provision of schools.
- **Taylor Wimpey UK Ltd** support the general principle of development but note that outstanding issues exist regarding traffic impacts, infrastructure, CI and why footpath requires a 50m buffer.
- **Barratt Homes and David Wilson Homes** strongly question whether site meets test of soundness as it has not been positively prepared and not fully justified.
- **TW Fields** say that amendments to site boundary are required to deliver a Garden Village and that three options proposed to deliver a sub-urban Garden Village with the provision of a primary school, village centre, public open space, allotments and recreational facilities.
- **Osbaldwick Parish Council and Meadlands Residents Association** say development would spoil setting of the minster with rural landscape in the foreground, they believe that it goes against previous CYC representations and consultations. Furthermore, they claim that developers have admitted that current site is unviable. Additionally, the site compromises Green Belt and has no effective transport solution.
- **Highways England** make a number of comments regarding the potential cumulative impacts of strategic sites on the Outer Ring Road, stating that they are unable to consider the Plan sound until they have a good understanding of what those cumulative impacts are, and of the scale and nature of any improvement required. They note that, at the time of writing, CYC have yet to revise their Infrastructure Delivery Plan and Transport Topic Paper, and would expect these documents to contain mitigation measures, including capacity improvements to the A64 and its junctions. Policy should refer to ST8/ST15 and ST35.

General comments relating to the unsoundness of the site:

- Development cannot be justified given access point restrictions.
- Negative environmental impact on the city.

- Boundaries too close to village of Murton and would negatively impact the village and cause strain on infrastructure.
- Environmental issues highlighted by Historic England need to be addressed.
- Site is an intermediate and isolated growth area and is entirely inappropriate.
- Environmental problems indentified by Historic England needs to be addressed and also criticisms from the Ward and Parish councils to earlier drafts.

Modifications

Proposed modifications include:

- **Historic England** suggests that the eastern edge of site be pulled away from the ring road and that the impact of development of this site upon SOA14 should be amended to “serious harm”.
- **Barratt Homes and David Wilson Homes** want the boundary of the allocation to be increased to include additional land to the south so that it relates more suitably to the existing built form of Osbaldwick – no map provided assumed to be the same boundaries as those proposed by TW Fields.
- **TW Fields** would like the boundary of the allocation to be increased to include additional lane to the South and West to make the site more viable and accessible. Two options proposed: 975 dwellings and 1225 dwellings.
- **Education and Skills Funding Agency** say the land should be safeguarded for school provision and that detail regarding when new schools will be required for new housing developments.
- **Taylor Wimpey UK Ltd.** say that land between site and urban edge to the north / northwest should form part of site and be allocated for housing. Boundary proposed. Furthermore, housing needs to be led by housing needs assessment and public transport/cycle connectivity could be improved by connecting the site to the urban edge.
- **Persimmon Homes** would like the boundary to revert back to the Publication version (2014) extending between Stockton Lane and Osbaldwick.
- **Osbaldwick Parish Council** and **Meadlands Residents** Association want the removal of allocation from the plan and the land determined to be left permanently open as Green Belt.

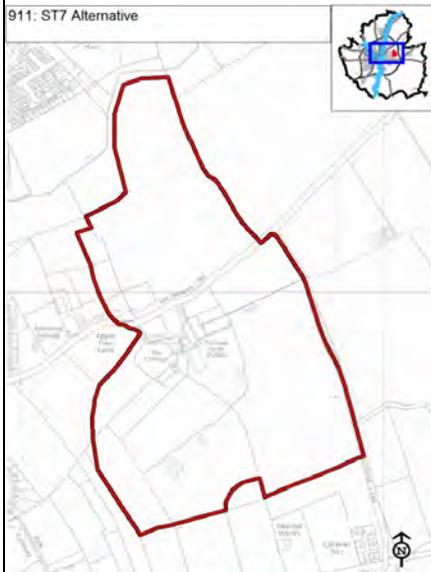
Other modifications include:

- Revised wording to key principle vi.
- Removal of key principle x completely or alternatively revise wording.
- SS9 should refer to cumulative impact towards sites ST35 and ST15 and vice versa.

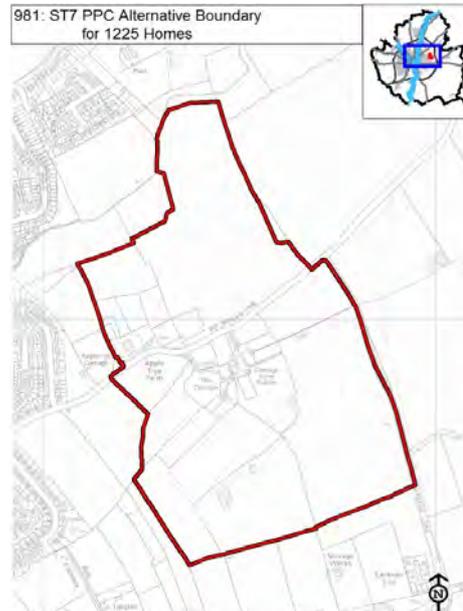
Site plan showing proposed modifications, where relevant:
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TW Fields suggest the following two boundary alternatives:

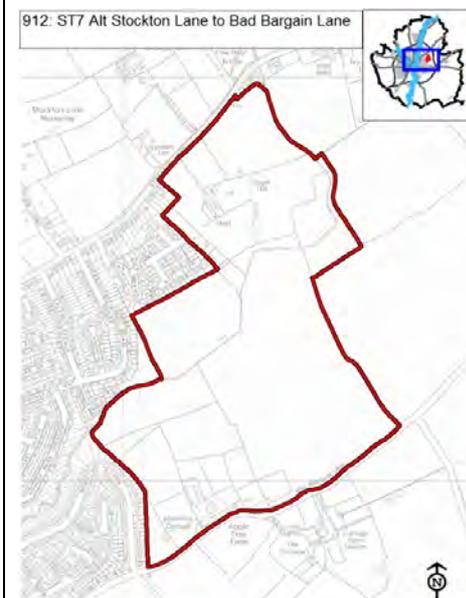
1) 975 dwellings



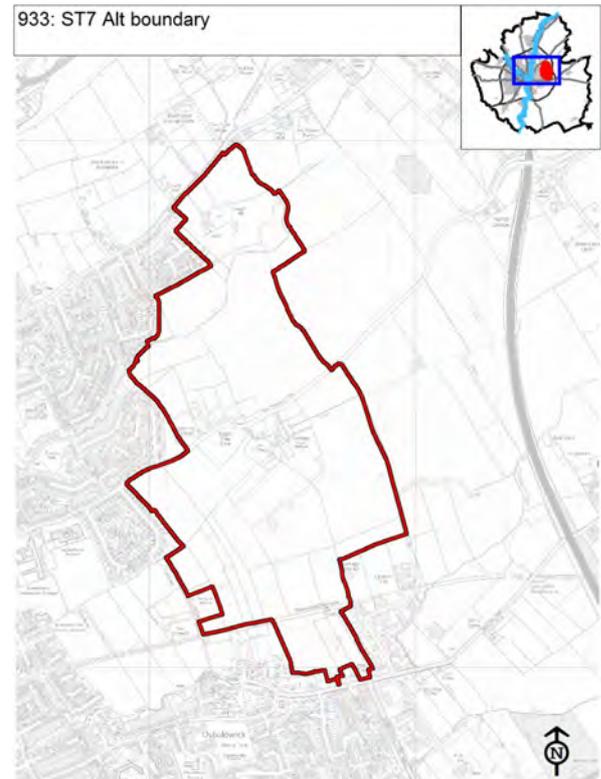
2) 1,225 dwellings



Taylor Wimpey UK Ltd Taylor Wimpey would support a boundary change to the north of ST7, connecting the site with Stockton Lane to improve the connectivity of the site. The site promoted on behalf of Taylor Wimpey comprises a irregular shaped parcel of land covering approximately 46.3 hectares bounded by Stockton Lane to the north and Bad Bargain Lane to the south.



Persimmon Homes propose reverting to the development boundaries proposed by the Council in the October 2014 version of the Local Plan Publication Draft for the northern part of ST7 - larger boundary of 43.8ha with 1,052 dwellings:



SS10 (ST8) – Land North of Monks Cross

Summary of main issues raised

Legal Compliance

No specific comments were made on the Plan's Legal compliance in relation to this site.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **YEF Transport Group** and several residents believe that the proposed Site (ST8) will increase vehicular traffic and congestion.
- **Historic England** believe the current proposed allocation of housing in ST8 will likely harm the special character and setting of York by reducing the gap between the edge of the built-up area and the Ring Road.
- **Green Development** do not support the proposed boundary of ST8 as it does not adjoin the existing settlement limits of Huntington and therefore cannot rightly be considered to be an urban extension.
- **Redrow Homes, GM Ward Trust, K Hudson, C Bowes & E Crocker** (landowners) support the allocation boundary for ST8 commenting that a planning application has been submitted for this boundary with some open space and community functions to the east and west of the identified boundary.
- **Redrow Homes & Linden Homes** object to the removal of land to the north of North Lane. In terms of ST8 they consider the target 968 dwellings is achievable but support a boundary change which could significantly increase capacity to circa 1,400 dwellings if the 2014 ST8 boundary is reinstated.
- **Barratt David Wilson Homes** - supports the retention of the site Land North of Monks Cross (Site Ref. ST8) as a proposed strategic site allocation within the Publication Draft Local Plan. However, they would like to work alongside CYC and the other developers of the site to finalise the site specific strategic development policy to be included within future versions of the Local Plan to ensure the site comes forward in a comprehensive manner.
- **Highways England** make a number of comments regarding the potential cumulative impacts of strategic sites on the Outer Ring Road, stating that they are unable to consider the Plan sound until they have a good understanding of what those cumulative impacts are, and of the scale and nature of any improvement required. They note that, at the time of writing, CYC have yet to revise their Infrastructure Delivery Plan and Transport Topic Paper, and would expect these documents to contain mitigation measures, including capacity improvements to the A64 and its junctions. Policy should refer to ST7/ST15 and ST35.

General comments:

- Reasoning for green wedge between Huntington and ST8 is unjustified.
- Concerns over impact on traffic
- Should only come forward if the outer ring-road is dualled.

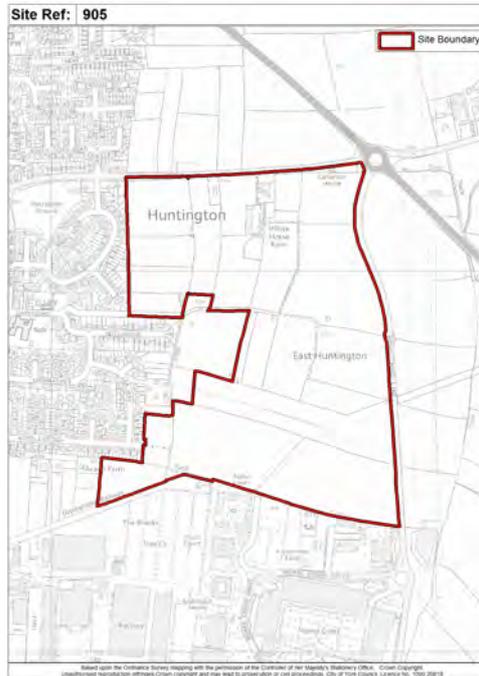
Modifications

Proposed modifications to Site ST8 include:

- **YEF Transport Group** and **York Labour Party (Harry Thornton & Rachael Maskell)** suggest that consideration should be given to extending Park and Ride services to ST8.
- **Historic England** believes development should be pulled away from the northern Ring Road and Monks Cross link road.
- **Michael Glover LLP Curry, Hudson and GM Ward Trust** – Would like Land to the immediate south of North Lane, to the east of the existing Huntington urban edge, and to the immediate west of the western boundary of proposed strategic site ST8 should be included / part re-instated to form part of site ST8
- **Green Developments** inclusion of field to north of north Lane should be included as part of ST8 and argue that ST8 should be alternative site 914 as together these Sites would naturally extend Huntington with A1237 providing a strong defensible boundary.
- **Redrow Homes, GM Ward Trust, K Hudson, C Bowes & E Crocker** - Land to the immediate south of North Lane, to the east of the existing Huntington urban edge, and to the immediate west of the western boundary of proposed strategic site ST8 should be available for openspace and community uses associated with the site.
- **Redrow Homes & Linden Homes** request that the allocation should be expanded northwards to include land to the north of North Lane, to the east of the existing Huntington urban edge.
- Other suggestions include the dualling of Monks Cross link road from Jockey Lane to the A1237 and general opposition to construction within the Green Belt.

Site plan showing proposed modifications, where relevant:

Michael Glover LLP, Curry, Hudson and GM Ward Trust suggest the following boundaries for Site ST8:



Redrow Homes, GM Ward Trust, K Hudson, C Bowes & E Crocker Support the existing allocation boundary but would like to enable some externalised open space as presented below:



Redrow Homes & Lindon Homes suggest the following boundaries for Site ST8:



Green Developments support Redrow and Lindon Homes boundary (above) with the addition of the following field :



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SS11 (ST9) – Land North of Haxby

Summary of main issues raised

Legal Compliance

Respondents have commented on the Plan's Legal compliance in relation to this site:

- Extra housing in Haxby is unsustainable.
- The views of existing residents have not been taken into consideration.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **Haxby Town Council** have stated that a sustainable transport infrastructure is needed to support the proposed housing allocation and that the Local Plan's allocation of affordable housing falls significantly short of the identified need. They have also suggested that the current sewerage arrangements are not fit for purpose, as supported by current residents' experience. Furthermore, they argue that Crooklands Lane is under threat of being compromised due to development.

Haxby Town Council want assurances that there will be enough schools places for the substantial number of children the proposed 735 houses will generate. They also note that current primary care medical provision is at breaking point because of the increasing demands of an ageing population.

- **Honorary Alderman Richard Watson** believes the Plan is unsound as the road network in Haxby is currently inadequate.
- **YEF Transport Group** believes that ST9 does not fully adhere to the design principles for new developments specified in Policy T1 because it makes no reference to public transport provision.
- **Strensall and Towthorpe Parish Council** states that Walbutts Sewage Treatment Plant is unlikely to be able to accommodate the extra flow of sewage generated by ST9. They also believe that the traffic generated by new residents will exacerbate existing congestion problems in Strensall village.
- **Strensall with Towthorpe Neighbourhood Plan Steering Group** argue that the Plan is unsound due to foul waste and the negative effects additional traffic would bring.
- **Linden Homes, Barrat Homes & David Wilson Homes** states that the allocation is sound in that it is justified, positively prepared and effective. However they have minor comments in relation to master planning, housing mix, openspace, new local facilities and access.
- **York Environment Forum** believes the Local Plan is unsound as the extension to Haxby is unacceptable as the settlement is already over

developed with inadequate infrastructure and access to services.

- **Julian Sturdy MP** is disappointed that ST9 has not been reduced further. Sturdy MP believes that there has been a lack of acknowledgement for potential air concerns and that the site will create a strain on parking and local infrastructure whilst also negatively affecting surface water drainage.
- **Mr & Mrs Sunderland and Mr & Mrs Wilson** are unsure why the Sustainability Statement shows the site being delivered beyond plan period and the Draft Publication shows the site being delivered within plan period. They believe the Plan is unsound due to this lack of clarity.
- **Cllr Ian Cuthbertson** believes the proposed Site ST9 is likely to create more problems through the providing of new/upgraded infrastructure, the addressing of traffic access problems at two key junctions, and the birth of a secondary 'small' new village some distance from the existing main thoroughfare in Haxby.

Additionally, Cllr Cuthbertson is concerned that air quality will be negatively affected due to ST9's situation at the north of Haxby, which will result in more journeys from through Haxby as commuters attempt to get in and out of the City centre.

Regarding the soundness of ST9, the main concerns of residents are that there is not enough infrastructure to support the proposed dwellings; the proposed housing will worsen existing congestion leading to poorer air quality and a threat to children's safety on the roads; and, the risk of flooded posed by ST9 being situated on marshland.

Additional concerns were the situation of ST9 within the Green Belt and the threat to historic landscape as a result, the lack of mention of an Air Quality Impact Assessment for Haxby and the National Grid's forbidding of development adjacent to or below its HV power lines.

One resident suggested that the Plan ignores all 1-15 points of the Sustainability Objectives.

Modifications

Proposed modifications include:

- **Haxby Town Council** proposes a number of modifications aimed to address the soundness issues of the Plan. First, housing developments should be deferred until improvements to the A1237 have been completed or they should be relocated to sites with access to the dual carriageway A64.

Secondly, firm commitment to require developers to include in excess of 30% affordable housing in all areas.

Thirdly, developments should not take place before the current problems with sewerage and drainage have been resolved by Yorkshire Water.

Fourthly, consideration should be given to relocating the building elsewhere where the environment is not so sensitive and of such a historic nature.

Finally, government backed support for school provision and premises/staffing when this is beyond the powers of CYC must be guaranteed at the time development commences.

- **Honorary Alderman Richard Watson** suggests that Site ST9 ought to be removed and its housing allocated to Site ST14.
- **YEF Transport Group** state that for the Plan to be sound the current bus service to the site should be extended, Haxby rail station is reopened, and the need for additional vehicular traffic through Haxby village be minimised.
- **Strensall and Towthorpe Parish Council** wants Site ST9 to be removed from the Plan in its entirety or significantly reduced in size.
- **York Labour Party (Harry Thornton & Rachael Maskell)** want the current Haxby bus service to be extended.

The most frequent modifications suggested by local residents include: the building of infrastructure before building commences on ST9 (inc. schools, sewers, more doctors, buses etc.); converting the bypass into a dual carriageway; and, the reopening of Haxby rail station.

Additional modifications were proposed, such as alternative access to Site ST9, an investigation into the Site in order to ascertain whether or not it is of significant heritage value, and that no illegal development underneath the pylons be conducted.

Others have suggested relocating the allocated housing amongst garden villages/to the south of the city, reducing the size of the allocation and the removal of ST9 from the Plan in its entirety.

Site plan showing proposed modifications, where relevant:

No proposed modifications to proposed boundary however **Linden Homes, Barrat Homes & David Wilson Homes** have provided an updated masterplan.

SS12 (ST14) – Land West of Wigginton Road

Summary of main issues raised

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this site:

- **Barratt Homes & David Wilson Homes** and **TW Fields** believe the documents are Legally compliant and support the allocation of the site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Barratt Homes & David Wilson Homes** and **TW Fields** support in principle the site allocation and garden village but also support the expansion of the site to increase the number of dwellings. They believe the site is in a good location, close to existing infrastructure and a retail park and far from wildlife.

Respondents that consider the plan unsound in regards to this site:

- **Historic England** considers the site sound with exception to criterion vi. subject to the change in relation to transport. Site size must not be increased to prevent harm to elements which contribute to the special character and setting of York. Needs to be reflected in criterion.
- **Airedon Planning and Design** comments that the Plan is not sound as the CYC has failed to apply its own site selection methodology correctly, and that there are issues with the sustainability of the site. Suggests there has been a failure in completing a proper assessment of sustainability of the sites chosen.
- **Lichfields** comment that the plan would be made sound if CYC allocated additional land to meet housing needs which can deliver early.
- **Julian Sturdy MP** raised concerns regarding the impact of this proposal on the A1237 and already pressured transport system.
- **York Environment Forum Transport Group** comment development will add significantly to the vehicular traffic and congestion on York's road network.
- **York Quality Bus Partnership** comment that many young people in area take bus to school and ST14 is not big enough to support new bus services and would need to be linked to current routes.
- **Cllr Denise Craghill of York Green Party** comments that sustainable transport provision for the area is inadequate as roads are already congested.
- **YTUC** comments that the reduction of site should be rejected and the larger previously proposed site reinstated to ensure it is sufficient to fund community facilities.

- **York Civic Trust** comments that the site does not comply with paragraph 17 of the NPPF regarding sustainable development and transport.

General comments:

- Site is a Greenfield site of prime agricultural land.
- Risk of gridlock from site on A1237.
- Affect of Haxby/ Wigginton resident travel times.
- Lack of inclusion of strict criteria on infrastructure requirements (e.g. schooling and road infrastructure).
- Site is too small to accommodate necessary infrastructure.
- Development must meet guidelines for both annual build of houses and affordable homes.
- Infrastructure must be built before housing.
- Infrastructure of area is at capacity for development and can take no more.

Modifications

Comments from specific bodies:

- **Historic England** considers the site sound with exception to criterion vi. Subject to the change in relation to transport. Site size must not be increased to prevent harm to elements which contribute to the special character and setting of York. Needs to be reflected in criterion.
- **Barratt Homes & David Wilson Homes** and **TW Fields** support the expansion of the site. Presented three potential development options to the Council to provide a new Garden Village of either 1,350 homes; 1,725 homes; or 2,200 homes alongside the delivery of significant community infrastructure
- **Airedon Planning and Design** comments that the proposals Map should be altered to exclude ST14 and access road locations.
- **Wakefield Properties Ltd** comments that CYC should additional land to meet housing needs which can deliver early, suggests small site allocations around existing settlements.
- **Honorary Alderman Richard Watson** suggests increasing the size of ST14.
- **Harry Thornton and Rachell Maskell of York Labour Party** and **YEF Transport Group** comment that new access routes directly to the regional road network should not be provided and that the link to the A1237 should be omitted and focus should be given to the new Clifton Moor Park and Ride site.
- **Cllr Denise Craghill of York Green Party** suggests new point 'vi' and 'x' (new transport plan and use of light rail) and amendment of 'viii' (upgrades to outer ring road).

- **YTUC** comments that the reduction of site should be rejected and the larger previously proposed site reinstated to ensure it is sufficient to fund community facilities.
- **York Civic Trust** suggests the provision of an over bridge for a direct footpath and cycleway to Clifton Moor and a bus way between the new housing and Clifton Moor Junction on the A1237 Ring Road.

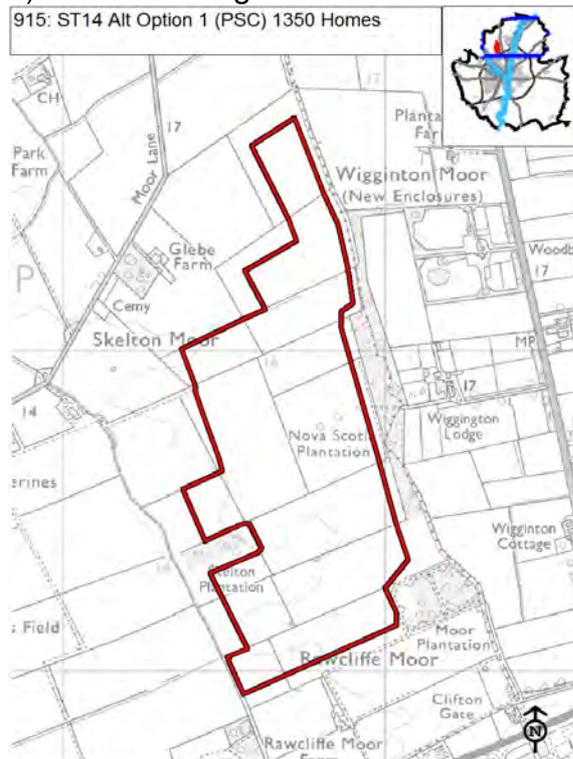
General comments:

- Increase the size of site as close to existing infrastructure and a retail park and far from wildlife.
- Several people comment that the site should be removed from the Plan and kept in the Green Belt.
- Housing numbers on sites near Northern Ring Road should be reduced.

Site plan showing proposed modifications, where relevant:

Barratt Homes & David Wilson Homes and TW Fields suggest 3 boundary alternatives:

1) 1350 dwellings



2) 1725 dwellings



3) 2200 dwellings

975: Alt PPC ST14 Option 2200 Homes



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SS13 (ST15) – Land West of Elvington Lane

Summary of main issues raised

Legal Compliance

The following comments are made on the Plan's Legal compliance in relation to this site:

- **F, R, and K Handley** are minority landowners who considered that the Local Plan is legally compliant as it has been prepared in line with statutory regulations: duty to cooperate: and legal procedural requirements such as the Sustainability Appraisal.
- **Langwith Development Partnership Limited** dispute the Plan's Legal Compliance, as required evidence is not yet available, and the spatial implications of the Plan are not possible to determine at this stage.
- **Yorkshire Wildlife Trust** comments that the development of the suggested allocation would be contrary to local policy G12 and the Conservation of Habitats and Species Regulations 2017.
- **Natural England** has outstanding concerns regarding the potential for functional linkages between birds found on ST15 and the Lower Derwent Valley Special Protection Area (SPA) but expect this to be addressed in the HRA.
- **Barwood Strategic Land II LLP** considers the policy unsound due to the lack

of robust evidence in relation to the legal certainty required by the Habitats Regulations.

- The impacts to infrastructure, pollution, congestion and wildlife from the scale of development proposed are unacceptable and not environmentally sound
- Development on the airfield would damage this historic site, destroying the runway.

Soundness

Those commenting feel this site raises a number of soundness issues, including:

- **F, R and K Handley**, as minority landowners, supports the inclusion of the site in allocation of a garden village. Land is deliverable and available.
- **Highways England** make a number of comments regarding the potential cumulative impacts of strategic sites on the Outer Ring Road, stating that they are unable to consider the Plan sound until they have a good understanding of what those cumulative impacts are, and of the scale and nature of any improvement required. They note that, at the time of writing, CYC have yet to revise their Infrastructure Delivery Plan and Transport Topic Paper, and would expect these documents to contain mitigation measures, including capacity improvements to the A64 and its junctions. In terms of SS13 specifically, Highways England state that the policy should include reference to Sites ST7, ST8 and ST35, in order to better describe its cumulative impact with other sites. The site has primary access via the A64 with a secondary access via Elvington Lane. For sustainable transport, HE feels the policy needs clarity around parking standards and direct public transport link towards the University and York City Centre. With reference to Policy T2 Strategic Public Transport Improvements, HE welcome the dedicated public transport / cycle route linking the new settlement to a suitable access on York's highway network in the urban centre of York.

Those who consider the Plan sound raise concerns around the impact of the development, including transport and access. Issues raised include:

- **Historic England** state that, subject to the changes set out, they support the principle of accommodating a proportion of the City's development needs in a new settlement of this size in this location (see further comments below).
- **East Riding of Yorkshire Council** request further clarification to outline how the allocation will be delivered, including how essential infrastructure costs and mechanisms for securing funding have been established.
- **Natural England** welcomes the policy and considers the provision of compensation five years prior development important considering the sensitivity of the location. In addition the requirement for the site to be

retained and monitored in perpetuity is very welcome in this context.

Those who consider the Plan unsound, including **Heslington Parish Council**, **Elvington Parish Council** and **Wheldrake Parish Council** raise similar concerns around the impact of the development on existing villages of Elvington and Wheldrake, particularly in terms of access to and from the A64/B1228, traffic (with a request for stronger policy commitment to public transport), local services, green belt and visual amenity and local wildlife. Notable in relation to wildlife is the potential impact on the SINC sites and Heslington Tillmire SSSI, as well as the nature/efficacy of mitigation proposed. Further comments refer to the impact on the Airfield, in terms of the history/recreation value that will be lost and Grimston Wood to the North. Further issues raised include:

- **Fulford Parish Council** requests the deletion of ST15.
- Amongst others, the **NFU** and **Heslington Parish Council** question the methodology behind alternative site selection, noting that the land within ST15 is productive farmland and provides other benefits to biodiversity/the environment. The site is also close to Heslington Tillmire SSSI; losses to the SSSI should be accounted for.
- **Heslington Parish Council** raises a further issue around the status of the site, noting that whilst the site is primarily brownfield, the infrastructure required to facilitate it would be across green belt.
- **York Civic Trust** comments that, since the site is remote from the services of Elvington village and public transport, it may not be in conformity with NPPF para 17 in terms of meeting the ambitions of 'sustainable development'.
- **Historic England** would oppose any increase in the size of the settlement because of the harm this would cause to numerous elements which contribute to the special character and setting of York. The infrastructure necessary to deliver this scale of development should not harm other elements which contribute to the special character and setting of York. To this end, criterion xii should be amended to read:- "...is limited. The design and layout of these roads should minimise the impact upon the openness of the Green Belt and demonstrate how they safeguard those elements which contribute to the special character and setting of the historic City."
- **KCS Developments Ltd** note that the site is likely to involve long and costly provision of infrastructure, with little certainty of supply due to complexities in delivery. There is no known developed interest at this time.
- The implications of OS10 as a nature conservation site rather than as managed conservation farmland providing arable land close to a major city has not been explored. SS13 will encourage increased pedestrian access to the SSSI at Tillmire including dog walkers disturbing breeding birds.
- Proposed dedicated secure access is ineffective as a means of providing

residents and businesses currently using these routes to continue to freely allow access to their properties/places of work.

- Grimston Wood has been ignored, risking the progress it is making towards biodiversity targets, which could help mitigate the impacts of development.
- Amongst others, **York Environment Forum** feel that the proposed Garden Village would not deliver a sustainable settlement as it is not large enough.
- **Langwith Development Partnership Limited** consider the plan unsound due to:
 - The strategic road link linking the garden village with the A64, and providing its primary access, is indicated on the Policies Map on an alignment that is technically undeliverable. The Policies Map should be updated to show the appropriate alignment.
 - No justification for secondary education provision on site.
 - The scale of open spaces proposed as part of SS13 (and Policy OS10) is not justified, not supported by any sound evidence, and falls in the control of various third parties, rendering it potentially unavailable and therefore not deliverable.
- All efforts should be made to ensure Elvington and the ST15 site do not meet in order to maintain their separate historic identities.
- **Yorkshire Wildlife Trust** comments that in order to make the plan sound conclusive evidence is needed to show that it is not important for SPA birds, or the site should be moved to the east or north with little wildlife interest. Several members of the public also comment on the need for a full ecological survey and the concern over wildlife and natural habitats not being protected.
- **York Quality Bus Partnership comments** on the need for additional school buses.
- Several people comment the site would dominate local villages, is disproportionate to the size and too close to the surrounding villages.
- Many disagree with building on the historical Airfield which is one of York's biggest tourism assets.
- Various comments on the site being Greenfield rather than brownfield as stated.
- Development may also strain on the B1228 and A64 traffic.
- All access to ST15 should be via proposed new roadways with no access at all from ST15 onto Langwith Stray, Langwith Lane or Long Lane.
- One comments that CYC should clearly identify and justify the number of

hectares of green belt arable land which will be lost to infrastructure for ST15 in addition to 139 Hectares in OS10.

- **Barwood Strategic Land II LLP** consider the policy unsound due to the lack of robust evidence in relation to the legal certainty required by the Habitats Regulations.
- **Michael Glover LLP - GM Ward Trust, Curry & Hudson, Redrow Homes, K Hudson, C Bowes & E Crocker, Avant Homes and Redrow Homes & Linden Homes and Taylor Wimpey UK Ltd** do not believe the site to be sustainable due to:
 - Being situated in the open countryside in an isolated location, with no existing infrastructure capable of accommodating the proposed levels of development.
 - ST15 has been subjected to a Sustainability Appraisal but scores no differently to other Strategic Sites in terms of accessing all local services. Given its remoteness, this would suggest there is a flaw in the scoring system.
 - To be truly sustainable the site would need to provide a secondary school and provide 5000-6000 should allow for higher housing numbers.
- **Linden Homes Strategic Land, PJ Procter and Shepherd Property Group** Site do not object to the allocation but consider the estimated yield from ST15 to be unrealistic and question the ability of the Plan to meet the housing requirement.
- **Gallagher Estates** comment that though the Sustainability Appraisal considers the selected sites against each other it fails to reassess them against alternatives such as the dismissed urban extensions which render the plan unsound.
- **York Trade Union Council** comments that proposed Elvington airfield (ST15) related development is not big enough to fund a full range of community facilities to make it a self sufficient community, and that it should be larger.
- **W Birch & Sons** comments that they oppose the allocation due to the impact on the existing businesses due to noise and light pollution.
- **Baratt and David Wilson Homes** – It is noted that none of our Clients land interests has been included within the allocation at land to the west of Elvington Lane (ref: ST15).
- **Osbalwick Parish Council and Meadlands Residents Association** comment that the site ought to be referred to as a 'new town' or 'new settlement', and not a 'Garden Village' - the sheer size precludes it from being a village.

Modifications

Proposed modifications include:

- **Langwith Development Partnership Limited** request a number of changes including:
 - Various suggested text changes to policy SS13 involving number of houses, public and private energy and waste, habitat creation, transport.
 - The strategic road link linking the garden village with the A64, and providing its primary access, is indicated on the Policies Map on an alignment that is technically undeliverable. The Policies Map should be updated to show the appropriate alignment
 - The boundary of ST15 should be amended as per their proposals to 204ha for 4018 dwellings.
- **Natural England** encourages CYC to consider making the wider evidence base for this site available and clarify what evidence accords to which variation of the site. They would also welcome further elucidation regarding how competing sustainability concerns were weighed against each other.
- **Fulford Parish Council** requests the deletion of ST15.
- **Heslington Parish Council** requests further work to model cumulative traffic flow impacts from ST15, ST27, H56 and ST4.
- Increase the scale of ST15 to deliver a genuinely sustainable settlement, and to reduce impacts on other villages from additional growth within those villages.
- ST15 should be moved further from Elvington and closer to the A64, to lessen the impact on the City's historic setting, on green belt and on the ecology/environment.
- Similar provision to Policy SS21 to 'provide landscaping/screening to assist in mitigation against the erosion of the existing semi-natural setting of the airfield' should be included.
- Require a full ecological survey to be undertaken a maximum of 3 years prior to development and mitigation to start 5 years before development.
- Access should be alongside the proposed new vehicle access to the A64 at Heslington East Campus, with no access from ST15 onto Langwith Stray, Langwith Lane or Long Lane.
- Proposed link road should be separated from existing local roads to provide dedicated cycle and pedestrian routes.
- The SA should give consideration to how Grimston Wood can encourage further advancement to meet York's biodiversity targets, and whether suitable

access to nature for residents can be agreed.

- Criterion xiii) should be amended to include the following: “It is essential that there is no vehicular transport access to Heslington Village from the new village settlement along current lanes ...”
- Criterion xvi) should be rewritten as follows: “The developer will need to include a series of measures designed to discourage the use of the private car by residents and encourage the use of more sustainable modes of travel, including cycling and walking.”
- **York Economic Forum Transport Group** consider the policy must be based on the full set of design principles for promoting sustainable travel, and include a much more challenging target for the proportion of journeys by sustainable modes;
- **Rachel Maskell MP, the York Labour Party and YEF Transport Group** request the deletion of direct access to the regional road network, in order to avoid the new village becoming a dormitory settlement for areas other than York; YEF Transport Group add that a high quality bus service should be provided through the site using grade separated crossing on the A64, and a dedicated link to the Grimston Bar P+R.
- Site should be constructed where it preserves the Green Belt to all 4 sides, in character of other villages in York. Current development would become an extension to Elvington. The Airfield should be retained for historical and economic uses. Should be further north, away from Elvington Airfield and closer to the A64 which would need a new junction before development.
- Needs provisions for infrastructure and transport links should be mentioned in policy.
- The **Education and Skills Funding Agency** states that it would be helpful if land was safeguarded for the provision of schools, and to include additional detail around when new schools will be needed.
- **Linden Homes Strategic Land, PJ Procter and Shepherd Property Group** suggests that the level of housing delivery in the plan period for ST15 should be reduced to 900 units.
- **W Birch & Sons** suggest that developers undertake noise and light assessments.

Baratt and David Wilson Homes – It is noted that none of our Clients land interests have been included within the allocation at land to the west of Elvington Lane (ref: ST15) – No site plan provided.

Site plan showing proposed modifications, where relevant:

Langwith Development Partnership Limited (from Appendix 1)

Figure 8: Land Parcels making up Langwith



Figure 10: Habitat Creation and Enhancement Areas



SS14 (ST16) – Terry’s Extension Sites

Summary of main issues raised

Legal Compliance

There were no specific comments made on the Plan’s Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Historic England** believes the policy is sound overall.

Respondents that consider the plan unsound in regards to this site / policy:

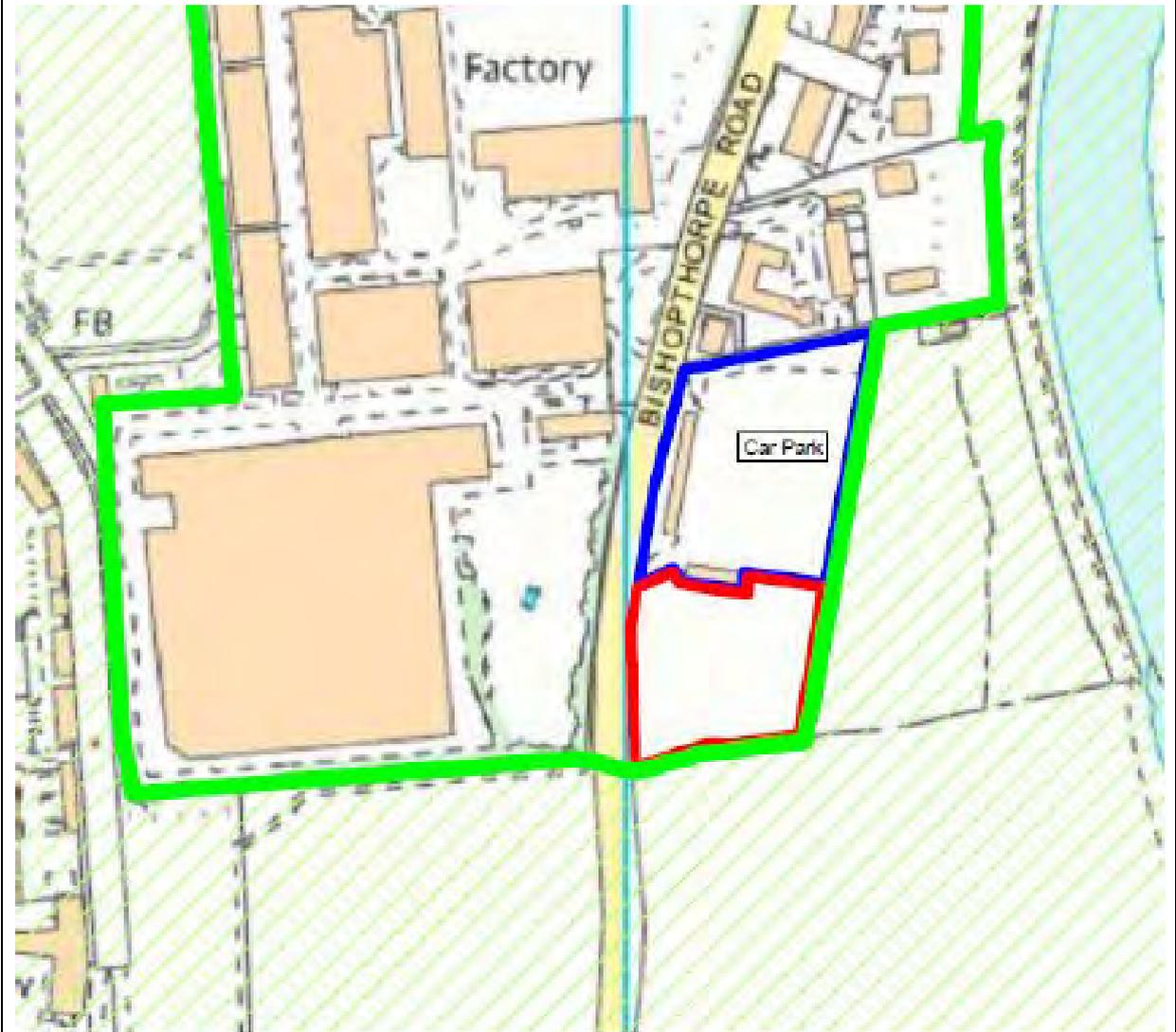
- **Henry Boot Developments Ltd.** fully supports SS14 Site 2 but consideration should be given to include additional land to the south and east, requiring realignment of the Green Belt Boundary.
- Estimated Yield (Dwellings) figures for ST16 phases 2 and 3 are too low.
- Given the indicative site capacities of 33 dwellings for Phase 2 and 56 dwellings for Phase 3, development of single or two storey houses would look diminutive and out of place in the context of existing buildings.
- Indicative Site Capacity for Phase 3 is too low.

Modifications

Proposed modifications include:

- **Henry Boot Developments Ltd.** believe development of a greater scale, development of three storeys or even higher, could be achieved during Phase 2, without compromising views of the Factory and the Clock Tower.
- Phase 3 should be design led and not restricted by an indicative capacity of 56. Net density of +100dph in the form of a denser and taller development would be more appropriate.

Henry Boot Developments Ltd propose the following extended allocation comprising of the area in red:



SS15 (ST17) – Nestle South
Summary of main issues raised

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Newby Developments** who have set out their intentions to convert the former factory buildings into 258 apartments and construct around 595 dwellings on the site.

Respondents that consider the plan unsound in regards to this site:

- **Cllr Denise Craghill of York Green Party** - Development Principle iii makes no mention of affordable housing provision. Allocation is inconsistent with other sites and there is no robust approach to sustainable transport.
- **York Environment Forum** object as the site has no cross road link between Wigginton Road and Haxby Road.

Modifications

Proposed modifications include:

- **Cllr Denise Craghill of York Green Party** says that reference should be added to affordable housing provision to Development Principle iii and to add two Development Principles ix) Sustainable Transport Plan x) Site layout and walking and cycling routes should be designed to be more attractive than vehicular routes.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

SS16 (ST31) – Land at Tadcaster Road, Copmanthorpe
Summary of main issues raised

Legal Compliance

Comments on the Plan's Legal Compliance in relation to this site:

- Satisfied that the documents are legally compliant.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Gladman Developments** strongly support residential development on site and believe that the site is available, achievable, deliverable and capable of delivering up to 160 units. Furthermore, the site will contribute to 5 year housing land supply and the area needs growth and is a sustainable location.

Respondents that consider the plan unsound in regards to this site:

- **Historic England** say that the site will cause harm to special character of the city. They believe that the site is part of swathe of open countryside and the distance between settlements and size of settlements greatly contributes to the character of the city.

Other comments raised identifying the policy as unsound:

- Too many new houses proposed.
- Housing density too high.
- Bishopthorpe more suitable location.
- Includes sites of special historic interest.
- Harm caused to wildlife.
- Proposed housing density greater than average density for the village.
- There is a need to keep area around Moor Lane designated as Green Belt land.

Modifications

Proposed modifications include:

- **Historic England** wants the impact of the development of this site upon SOA14 should be amended to “serious harm”.
- **Gladman Developments** suggest that the site deliverability of dwellings should be increased from 158 units to 160 units.
- Clause i to be amended to state “a mix to be agreed with the council prior to determination to reflect local needs and circumstances”.
- Clause ii to be amended to state “...which should be delivered prior to occupation of the first phase of development...”

General comments:

- Reduce proposed housing density on both development sites to a maximum of 25 per hectare.
- Site should be removed from the Green Belt.
- Housing densities be reduced to the CNP2 densities detailed in Policy of the Copmanthorpe Draft Neighbourhood Plan.
- Keep area around Moor Lane designated as Green Belt land.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

**SS17 (ST32) – Hungate
Summary of main issues raised**

Legal Compliance

There were no specific comments made on the Plan’s Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **Lichfields** made several comments on the soundness of the plan, such as:
 - Site housing number allocation of 328 dwellings should not be taken as a definitive figure and the policy wording should be amended to allow flexibility to deliver more homes on this site where appropriate.
 - Wording implies this figure is also the total capacity, though this reflects the approximate number of dwellings to be delivered in phases 5 as set out in policy SS17. Unclear how this figure has been calculated.
 - Plan should allow scope for change in future.

Modifications

Proposed modifications include:

- **Lichfields** made several comments on modifications to the plan, such as:
 - Site housing number allocation of 328 dwellings should not be taken as a definitive figure and the policy wording should be amended to allow flexibility to deliver more homes on this site where appropriate.
 - Wording implies this figure is also the total capacity, though this reflects the approximate number of dwellings to be delivered in phases 5 as set out in policy SS17. Unclear how this figure has been calculated.
 - Plan should allow scope for change in future.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

SS18 (ST33) – Station Yard, Wheldrake

Summary of main issues raised

Legal Compliance

Amongst others, **Peter Vernon & Co.** comment on the Plan's Legal Compliance in relation to this site, stating:

- Plan does not comply with Duty to Cooperate due to inadequate number of meetings with neighbouring local authorities.

Other concerns raised include:

- Inclusion of the site is outside range of reasonable decisions by CYC. Plan is therefore not legally compliant and has not complied with the duty to cooperate.
- No evidence of consideration for outer perimeters of York and the Green Belt and should left out of development unless can satisfy criteria for development in the Green Belt as does not currently comply with NPPF Green Belt Policies and Test.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Historic England** says the site adjoins boundary of Conservation Area, we therefore welcome the requirement for development that conserves and enhances the special character/appearance of the area.

Respondents that consider the plan unsound in regards to this site / policy:

- **Peter Vernon & Co.** says the plan does not correctly identify the site boundary of the allocation.
- **Julian Sturdy MP** says there is general support heard from residents but not at proposed density and there is a concern regarding the oversubscription of local schools and the potential exacerbation of traffic issues on A19.
- **Wheldrake Parish Council** say there is an overwhelming objection from villagers to size and scale of proposed development.
- Unacceptable pressure on infrastructure and local schools.
- Proximity of development to industrial estate an issue.
- Significant proportion of development on good quality agricultural land and in Green Belt.
- **Linden Homes** object to allocation of site for housing due to issues with site methodology, lack of HRA and pollution from nearby industrial estate. They say that site 926 is more suitable for housing. They are concerned that the

proposed site has no defensible Green Belt boundary to the south-west.

General comments relating to the soundness of the site:

- Scale of development inappropriate.
- Infrastructure and services cannot cope.
- Proximity to industrial estate unlikely to comply with Planning Guidance.
- Part of proposal in Green Belt.
- Previous proposals were rejected.
- Proposal would not enhance the special character/appearance of Wheldrake and area should be retained to fulfil that purpose.
- Local school already oversubscribed, expansion required prior to commencement of development.
- Air pollution issues.
- Unjustified use of good quality agricultural land.
- Choice of site does not promote sustainable transport.
- Limit potential expansion of Wheldrake Industrial Estate and hinder economic growth.
- Development is not economically sound and will never be built.
- Fails to comply with NPPF.
- Inaccurate policy that deliberately omits relevant information to disguise inappropriateness of the site.
- Inappropriate proposed housing density.
- Each SA objective has been inappropriately assessed for the site.

Modifications

Proposed modifications include:

- **Peter Vernon & Co.** say the proposed site boundary needs changes as per our recommendations.
- **Wheldrake Parish Council** say the current plan should reference and include in its evidence base the CYC Draft Local Plan 2005, Draft Green Belt Local Plan and inspectors report from York Green Belt Public Enquiry and that all sites that conflict with the Outer Green Belt boundaries should be removed.
- **Linden Homes** suggest that the site be removed from the plan and replaced with site 926.

Other modifications include:

- Instead of developing SS18, incorporate it into SS13 or should CYC provide clear justification for SS18 then it should be limited to the original Station Yard part.
- Reduce scale of site to 25-30 dwellings and move remaining to Garden Village (ST15)
- Extend size of ST15 and eliminate need for increased dwellings in Elvington and Wheldrake.

- Remove site from plan, reinstate site E7 and increase number of dwellings at SS13.
- Boundary of site needs changing.
- Reference and include in evidence base the CYC Draft Local Plan 2005, Draft Green Belt Local Plan and inspectors report from York Green Belt Public Enquiry.
- Remove all sites that conflict with the Outer Green Belt boundaries.
- Site should be removed from plan and replaced with site 926.

Peter Vernon & Co suggest that the entrance to site ST33 be modified to represent the following area :



SS19 (ST35) – Queen Elizabeth Barracks, Strensall

Summary of main issues raised

Legal Compliance

Yorkshire Wildlife Trust, Barwood Strategic Land II LLP and Natural England comment that the site does not yet have sufficient background evidence available to ensure there will not be an impact on Strensall Common (SAC).

Soundness

Respondents that consider the plan sound in regards to this site:

- **Strensall with Towthorpe Parish Council** have made a series of comments including:
 - Supports the reduction in number of dwellings but is concerned this may reduce the finances available for necessary infrastructure improvements.
 - Need to address issues concerning sewage at the Severn Trent facility and issues at A64 Towthorpe Lane junction, which needs an upgrade.
 - Cycling routes are unsafe and an off cycle route is required.
 - Opposes access being taken off northern part of Scott Moncrieff Road as would cause a major reduction in traffic on Strensall Road.
 - Various suggestions on development.
- **Julian Sturdy MP** welcomes proposal but is concerned about increased traffic. Local amenities and open space should be supported.
- **Gallagher Estates** comments that the site remains operational until vacated by existing users
- **Historic England** support this site for development.
- **Highways England** make a number of comments regarding the potential cumulative impacts of strategic sites on the Outer Ring Road, stating that they are unable to consider the Plan sound until they have a good understanding of what those cumulative impacts are, and of the scale and nature of any improvement required. They note that, at the time of writing, CYC have yet to revise their Infrastructure Delivery Plan and Transport Topic Paper, and would expect these documents to contain mitigation measures, including capacity improvements to the A64 and its junctions.

Additional comments include:

- Support was received for the brownfield site to be developed for housing.
- Suggestion that there should be access to the Common and making it a public amenity.
- Support the reduction in dwellings numbers
- Identified outstanding concerns in relation to traffic and transport access.

Respondents that consider the plan unsound in regards to this site:

- **Earswick Parish Council** comments that the site would lead to an increase in traffic in Earswick Village.
- Developers and landowners from across the city comment that the site is to be disposed of in 2021 but is not without challenge as the site is adjacent to an SAC. They also comment that more facilities are required such as a retail shop and school which impact sites viability.
- **Yorkshire Wildlife Trust** comment that the site needs sufficient information on the impacts of disturbance and hydrology of the site in relation to Strensall SAC and the Conservation of Habitats and Species Regulations 2017.
- **York Environment Forum Transport** Group comment on the risk of increases in traffic and raise concern that the site doesn't adhere to the design principles set out in the other policies.
- **Barwood Strategic Land II LLP** deem the plan unsound due to the lack of robust evidence for the site as required by Habitats Regulations.
- **MOD/Defense Infrastructure Organisation (DIO)** support allocation of the site with supporting evidence and confirm their intention to deliver the site ready for development post 2021. However, they make the following points:
 - Their HRA supplied post Reg 18 consultation satisfies concerns in relation to habitats and ecology at ST35 in relation to air quality, recreational pressure and hydrology.
 - They object to reducing housing number to 500 as they claim this will jeopardise viability.
 - Restrictions "ensuring no access throughout the life of the development to adjoining land on the north, south and eastern site boundary" is too restrictive and premature.
 - Linking implementation of measures to 'commencement' of development is not appropriate; linking this to 'occupation' i.e. When people move in is a more reasonable approach (point iii in policy SS19).
 - Point v. of the policy should be amended because otherwise would prioritise the retention of buildings of limited heritage significance and could mean appropriate development would be precluded or the development potential of the site not fully realised.

Additional comments include:

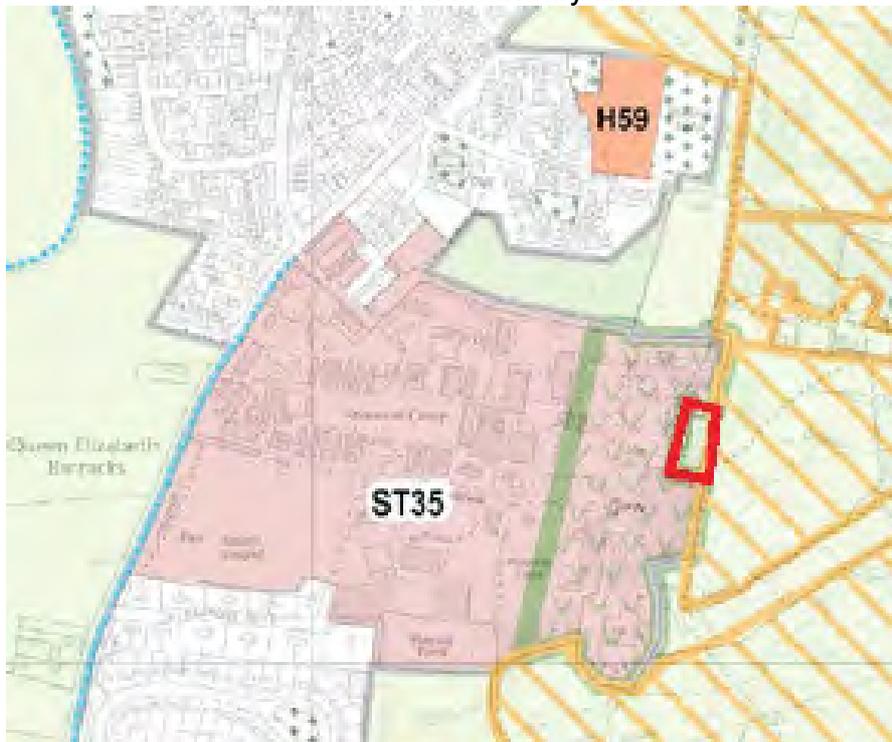
- There is a need for a separate road or road from Towthorpe to be utilised.
- Concerns in relation to location of the site adjacent to Strensall Common.
- Drainage needs to be improved.

Modifications

Proposed modifications include:

- **York Labour Party (Rachael Maskell and Harry Thornton) and York Environment Forum Transport Group** suggest that the current bus service should be extended and to construct a new station at Strensall.
- **York Environment Forum Transport Group** also suggest the policy must be based on the full set of design principles set out in the other policies for promoting sustainable travel.
- **Yorkshire Wildlife Trust** suggests that more baseline data on visitors and disturbance to the common and hydrology impacts is required and that an HRA be included.
- **DIO** support a higher housing number for the site with a masterplan for 650 dwellings in total; 605 at ST35 and 45 at H59 with existing open space maintained. Suggest modifying opening paragraph to *'Following the Defence Infrastructure Organisation's disposal of the site by 2021, Queen Elizabeth Barracks (ST35) will deliver up to 605 dwellings at this previously developed site. Development is anticipated to commence from 2023.'*
- **DIO** propose modified site boundary, with OS12 omitted. Recommends various amendments to policy and supporting text in relation to this.
- **DIO** seeks clarification in relation to the reference that an assessment is required in relation to the military training area, and requests clarity to confirm that a 'noise assessment' only is sought in this context.

Defence Infrastructure Organisation propose the following amendment to allocation and boundary limits:



SS20 (ST36) – Impfal Barracks, Fulford Road

Summary of main issues raised

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Historic England** comments that CYC should have a good understanding of the significance of the site and the buildings and supports paragraph 3.90 to undertake a review of the site.

Respondents that consider the plan unsound in regards to this site:

- **KCS Development Ltd** are uncertain about the site as it will not be released for until 2031 with development unlikely to start till 2033. Many buildings may need to be retained due to heritage values.
- **Fulford Parish Council** comments that there is undue concentration of development in the SE quadrant of the city causing loss of open land, visual harm, congestion and pollution. Increased traffic would damage character of Fulford Conservation area. As site may not be developed before end of plan period
- **Cllr Andy D'Agorne of York Green Party** comments that no assessment was made on the viability if the site for re-use as employment land. Route 5 is also set to have the largest increase in morning traffic and there have been no priority measures planned.
- **Defence Infrastructure Organisation (DOI)** has a variety of comments including:
 - Support of the site.
 - Changes to the extent of Fulford Road Conservation area will affect capacity of the site.
 - Potential commencement of development earlier than current date.
 - Comments on Transport and Flood risk Appraisal prepared by DIO to be considered in site development.
- **Michael Glover LLP - GM Ward Trust and Curry & Hudson and Johnson Mowat OBO Redrow Homes, GM Ward Trust, K Hudson, C Bowes & E Crocker** comment on the raft of heritage concerns which may impact the quantum of delivery for the site. As it lacks certainty should not be included.
- **Redrow Homes & Linden Homes, Taylor Wimpey UK Limited and Avant Homes** comment that the site is operational and proposals to dispose of are not immediate or certain. It is located in a sensitive location near an SSSI and the need to deliver a primary school and retail shop will impact the sites

viability.

- **Highways England** wishes to be consulted as part of the Transport Assessment and Air Quality impact assessment for this site. The potential transport implications must be assessed both individually and cumulatively with ST5 and ST15.

General soundness comments:

- Site is unsustainable and causing significant traffic on the A19 already. Will cause increase in pollution. Already an issue with flooding for the local residents.

Modifications

Proposed modifications include:

- **Cllr Andy D'Agorne of York Green Party** suggests that the site must be reviewed to consider whether it is viable for housing and whether the number of houses is appropriate for the site.
- **Defence Infrastructure Organisation (DOI)** suggests several modifications including:
 - Amending the boundary to reflect submitted boundary provided in appendix.
 - Various suggested text changes, deletions and additional wording for policy.
 - Suggests Walmgate stry is not an SSI and so does not require a HRA.
- **Redrow Homes & Linden Homes, Michael Glover LLP - GM Ward Trust and Curry & Hudson, Avant Homes, Redrow Homes, GM Ward Trust, K Hudson, C Bowes & E Crocker** suggest to remove site from plan.

Defence Infrastructure Organisation propose the following amendment to allocation and boundary limits:



SS21 (ST26) – Land South of Airfield Business Park, Elvington

Summary of main issues raised

Legal Compliance

The only comment related to the legal compliance of SS21 is as follows:

- **Langwith Development Partnership Limited** disputes the legal compliance of the Plan as the appropriate evidence required to underpin the Plan is not currently available. As all of the requisite evidence is not available, and the spatial implications of the Plan are not capable of being determined at this stage, it is not possible to determine if the necessary duty to co-operate has been fulfilled.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Julian Sturdy MP** states that community representatives generally support the proposed extension and he personally welcomes the proposal of using B1 and B8 units, which will provide light industry, reflecting the rural nature of nearby villages. However, residents are concerned about the heritage of the site and existing traffic and congestion in the village.

Respondents that consider the plan unsound in regards to this site:

- **YEF Transport Group** believes that the development risks adding significantly to vehicular traffic and congestion on York's road network and notes that the policy (SS21) makes no reference to public transport provision in its current form.
- **W Birch & Sons** are concerned that insufficient land has been allocated to meet demand over the Plan period.
- **York Labour Party (Harry Thornton and Rachael Maskell)** state that new access routes directly to the regional road network should not be provided.
- **Langwith Development Partnership Limited** do not object to the extension to the Airfield Business Park but request that the policy (SS21) has specific recognition of the Business Park's ability to link with Langwith, given the close relationship of both allocations.

Residents have objected to the soundness of SS26 on the grounds that development would result in more HGVs passing through Elvington; disturb the character of the village; have a negative impact on existing wildlife; and, that proposed dwellings are not able to be supported by existing infrastructure.

Modifications

Proposed modifications include:

- **Julian Sturdy MP** suggests that a full archaeological assessment take place

before development commences and that a vehicle weight limit be imposed in the village.

- **YEF Transport Group** believes the policy (SS21) must be based on the full set of design principles for promoting sustainable travel, and include a much more challenging target for the proportion of journeys by sustainable modes
- **W Birch & Sons** wants criterion (ii) deleted as no historic field boundaries exist. They also request that commentary is provided on criterion (v), reference to air quality, as there is none.
- **York Labour Party (Harry Thornton and Rachael Maskell)** want to omit the link to A1237 and focus on new Clifton Moor Park and Ride Site.
- **Elvington Parish Council** proposes a several suggestions for improving the soundness of the Plan. First, that a detailed archaeological and ecological assessment be undertaken before development commences. Second, a gap should be made between the existing and new estates, which would allow for a “wildlife corridor”. Finally, there should be a 7.5 tonne weight limit on Main Street as there are a disproportionately large number of HGV movements currently through the village.
- **YTUC** would like to see a good quality bus service that can also run on to the Airfield employment site.

The most frequent suggestion from residents was the imposition of a weight restriction/ban on HGVs in the village. Other suggestions included the conducting of a detailed archaeological and ecological assessment and the creation of gap between new and existing estates in order to allow for a ‘wildlife corridor’.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

SS22 (ST27) – University Expansion

Summary of main issues raised

Legal Compliance

Specific bodies have commented on the Plan’s Legal compliance in relation to this site, such as:

- **Langwith Development Partnership** dispute the legal compliance of the plan as appropriate evidence base is not currently available, without this it is not possible to determine spatial implications of the plan or if Duty to Co-operate has been fulfilled.

- Both **Shepherd Homes** and the **University of York** note that in the 25th January report to Council Executive, Selby District Council requested more information on ST15 and ST27 before they would provide further comments. This, along with other comments from neighbouring authorities, suggests cross-boundary issues have been discussed but not resolved, bringing doubt as to whether the Duty to Co-operate has been fulfilled.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **Heslington Parish Council** consider the plan unsound as the ‘exceptional circumstances’ required to justify development of greenbelt land have not been demonstrated. Expansion of the university could be accommodated by intensifying development on the existing western campus.
- **Historic England** are concerned that policy ED2 in its current form could lead to existing university buildings being demolished and replaced which will do considerable damage to the overall design concept / architectural historic interest of the University’s Western campus.
- **Fulford Parish Council** and a few local residents consider the allocation unsound due to the damage development in this location will do to the setting/character of York and outlying villages, whilst also exacerbating existing traffic issues. University expansion should be contained within existing campus boundaries.
- **York Environment Forum Transport Group** warns this development along with others on the outskirts of York risks adding significant congestion to the outer ring road. Adding a new junction to the A64 will further exacerbate this and risks developments becoming commuter dormitories. Policies on walking / cycling and public transport need to be much stronger.
- **Langwith Development Partnership** does not object to university expansion so long as it does not cause any undue impact on the existing environment and infrastructure, and where it does, it can be accommodated through mitigation measures. Potential transport, waste and access synergies with ST15 should be explored.
- **University of York** note that green belt boundaries should not be confirmed until the demand for sustainable development has been met, considers the plan unsound in this regard. Given the duration of the plan and various growth trajectories the University considers a 26ha allocation necessary; maintain that landscaping can mitigate any impact on the setting of the city.

Modifications

Proposed modifications include:

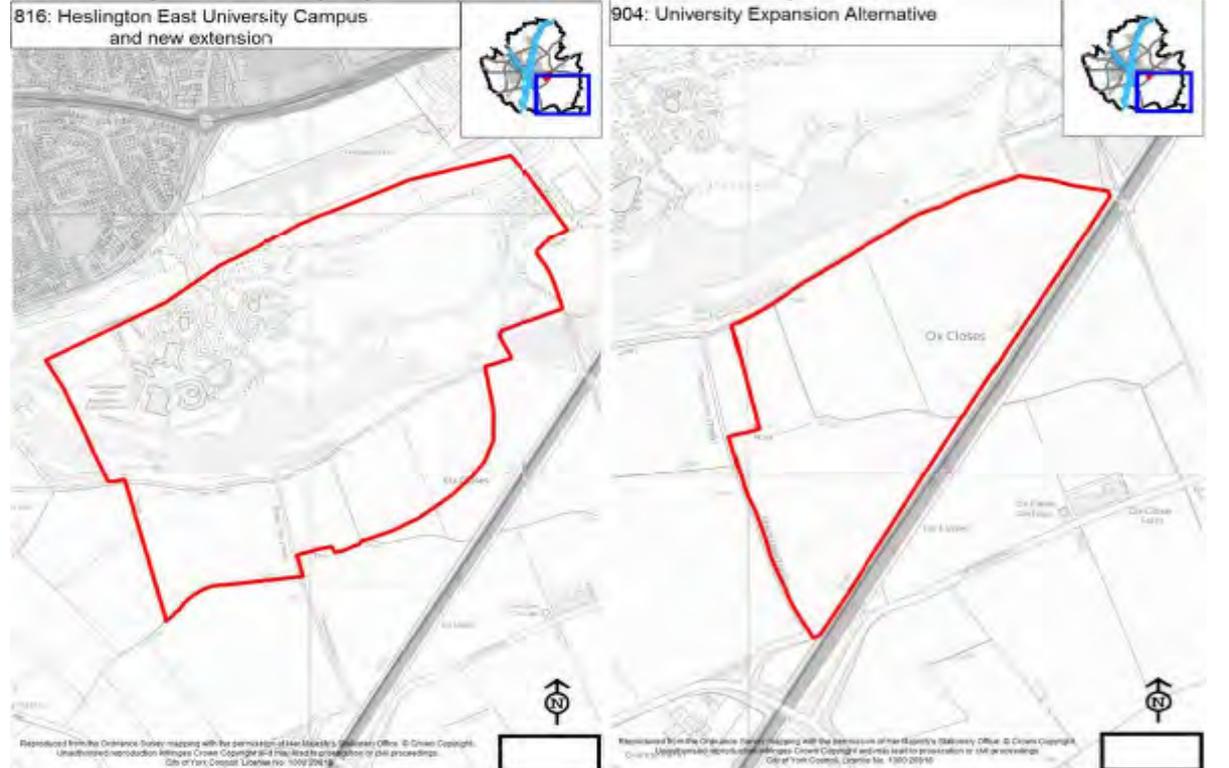
- **Historic England** stress this development could harm two elements that

contribute to the special character and setting of the city – 1) views from the A64 / openness of the green belt between the city centre and outer ring road, 2) the relationship between the city and outlying villages. Development should be restricted within the East Campus boundary and consideration should be given to expansion in a northerly direction onto site ST4 instead of ST27.

- **Langwith Development Partnership** alterations to text about landscape buffer between the site and A64. Also suggest adding reference to potential synergies between university expansion and ST15.
- **University of York** consider the site boundary should reflect their technical evidence which supports a larger site of 26ha.
- **York Labour Party** and **Rachael Maskell MP** stress that no direct route onto the A64 should be permitted, instead Grimston Bar Park & Ride should be extended and new bus services added.
- **Heslington Parish Council** would welcome justification as to why the development cannot be accommodated within bounds of the two existing campuses and why development of greenbelt land is being permitted in this case. Also request cumulative traffic flow impacts from ST15, ST27, H56 and ST4 to evidence that there will be no adverse impact on congestion on Hull Road, Field Lane, University Road and Heslington Lane.
- **Fulford Parish Council** and a few local residents' preference is for the site to be removed and university expansion to be accommodated within existing campus boundaries. However if site ST27 must be retained they request the criteria on sustainable / public transport is significantly strengthened, only businesses linked to the university be allowed on site and that all future demand for accommodation be met by building on university grounds. Criterion viii should be strengthened or deleted - opposed to a new direct link to the A64 in principle because of the harm it would do to the green belt but if it must go ahead then the university should make full use of it to the benefit of local roads / residents.
- One resident considers if absolutely necessary university expansion / conference facilities could be accommodated at York Central.
- **York Environment Forum Transport Group** request the direct access to the A64 be omitted and policies on walking/cycling and public transport be much stronger.

Site boundary modification proposed:

University of York's proposed allocation and boundary limits:



SS23 (ST19) – Land at Northminster Business Park

Summary of main issues raised

Legal Compliance

There were no specific comments made on the Plan's Legal compliance in relation to this site.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **Nether Poppleton Parish Council** believes the Plan fails the test of soundness for a number of reasons. Firstly, the development of 1500 houses is not sustainable on the same access road.

Secondly, they are concerned about public transport e.g. Park and Ride is a “red herring” as the area only operates until 7pm and the railway station at Poppleton is a 1.5 mile walk away.

Thirdly, the Plan does not consider traffic and Parish Council anticipates night deliveries will become the norm, which will disrupt those who currently live down the rural road. Fourthly, development should not proceed without significant improvement to the A1237 as congestion is already very poor.

Finally, the Plan fails the test of soundness as the expansion is too big and it is in the Green Belt.

- **Historic England** believe that in order to retain the separation between the Business Park and nearby villages, the southern extent of this area should not extend any further south than the existing car park to the south of Redwood House.
- **Northminster Business Park** state that whilst they support the allocation, they believe that Policy SS23 is not explicit in what will be required from development. They argue that criteria (i) and (ii) are open to interpretation and not effective in providing an appropriate framework in determining future planning applications. Furthermore, criterion (iv) is superfluous and unnecessary, and is repeated by criterion (v). Additionally, Criteria (v) and (vi) are unclear.
- **Mr D Lancaster & Oakwood Business Park** supports the removal of SS23 from the General Extend of Green Belt.

Residents believe that development would compromise the aesthetic of Poppleton, which, they add, is situated in the Green Belt.

Modifications

Proposed modifications include:

- **Nether Poppleton Parish Council** suggest that for the proposed draft Plan to be sound the B1224, with the current roundabout improvement, ought to be used as access to the site. Additionally, a full habitat, land quality, historic and character setting appraisal is needed.
- **Historic England** suggest that the extent of Site ST19 be amended so that the southern extent of the area extends no further south than the existing car park to the south of Redwood House. Also, that the impact of this development of this site upon SOA14 should be amended to “serious harm”.
- **Northminster Business Park** request that criterion (i) be rewritten to make clear what is actually meant or deleted and that criteria (ii) and (iv) are deleted. Furthermore, criteria (v) and (vi) should be rewritten to provide clarity.

One resident suggested that the Northminster Business Park expansion ought not to take place.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

SS24 (ST37) – Whitehall Grange, Wigginton Road

Summary of main issues raised

Legal Compliance

There were no specific comments made on the Plan's Legal compliance in relation to this site.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **Historic England** states that ST37 forms part of the green wedge that extends into the north of the City, which is centred on Bootham Stray. The loss of this Site and its subsequent development would result in the considerable narrowing of this wedge and harm one of the key elements identified in the Heritage Topic Paper (contribution to the special character and setting of York).
- **Autohorn Fleet Services Ltd** believe that amendments should be made to the proposed wording of Policy SS24 in order to provide further flexibility in respect of the future development of the site.

Modifications

Proposed modifications include:

- **Historic England** request that Site ST37 be removed from the Local Plan. They also want the impact of the development of this site upon SOA14 (Cultural Heritage) to be amended to "serious harm".
- **Autohorn Fleet Services Ltd** propose revised wording for Policy SS24 (ST37). Their rewording is as follows:

~~"Whitehall Grange, Wigginton Road (ST37) will provide up to 33,330sqm for B1 office and B8 storage use. In addition to complying with the policies within this Local Plan, the site must be delivered in accordance with the agreed Masterplan through the existing outline consent."~~

~~"Given the location of this site, development should be as unobtrusive within the existing landscape as possible, retaining and enhancing (where possible) aiming to increase the clarity and openness of the green wedge between Clifton Moor to the west and New Earswick to the east. Landscaping is integral to the development of ST37."~~

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

Section 4: Economy and Retail	
EC1: Provision of Employment Land	<ul style="list-style-type: none"> • Most objections deem the amount of land allocated for employment use inadequate as it does not match the City's ambitions for economic growth, particularly in B1a terms; • Concern that reliance on few large sites does not provide a variety of choice and or the allocated land will not provide sufficient employment for new residents over the course of the plan; • The shortage of B1a use class in particular highlighted multiple times; • Several specific comments were received in relation to employment site allocations. Various responses from developers / businesses asking for specific use classes to be added to those permitted for their site. • Barratt and David Wilson Homes welcome the plans commitment to deliver different employment and commercial sites but feels that the allocation of residential sites should be increased to be able to accommodate this and that the OAN should be a minimum of 920 dwellings per annum to ensure sufficient labour force is available. • Several developers feel that it is unclear which employment forecast has been used in preparation of the policy and how these relate to Leeds City Region Work and Northern Powerhouse and which methodology has been used to calculate housing requirement.

E8 Wheldrake Industrial Estate	
Summary of main issues raised	
Legal Compliance	
There were no specific comments made on the Plan's Legal compliance in relation to this site.	
Soundness	
General comments relating to the unsoundness of the site:	
<ul style="list-style-type: none"> • Grassland enhances approach to village and makes the industrial estate less intrusive. • Construction would degrade village and conservation area. • Wheldrake does not have a village green. • Site is currently utilised as a community space for Wheldrake. 	
Specific comments relating to the unsoundness of the site:	
Wheldrake Parish Council	
<ul style="list-style-type: none"> • Not appropriate site for inclusion as it would be situated on land at entrance to village (conservation area) and would have detrimental impact effect on 	

<p>setting and character of the village.</p> <ul style="list-style-type: none"> • Area also acts as green entrance way and community space.
<p>Modifications</p>
<p>Wheldrake Parish Council & General Comments</p> <ul style="list-style-type: none"> • Remove site E8 from the plan and/or designate it as Green Space within the village • Re-instate site E7 which was previously allocated.
<p>Site plan showing proposed modifications, where relevant:</p> <p>No proposed modifications to boundary.</p>

<p>E9 Elvington Industrial Estate Summary of main issues raised</p>
<p>Legal Compliance</p> <p>There were no specific comments made on the Plan's Legal compliance in relation to this site.</p>
<p>Soundness</p> <p>General comments relating to the unsoundness of the site:</p> <ul style="list-style-type: none"> • Increased amount of HGVs leading to an increased risk of accidents and pollution.
<p>Modifications</p> <p>There should be a weight/size restriction placed on HGVs through the centre of the village and using the bridge.</p> <p>Elvington Parish Council</p> <ul style="list-style-type: none"> • Site is not a Brownfield site as indentified, it is a grassy paddock.
<p>Site plan showing proposed modifications, where relevant:</p> <p>No proposed modifications to boundary.</p>

<p>E10 Chessingham Park, Dunnington Summary of main issues raised</p>
<p>Legal Compliance</p> <p>There were no specific comments made on the Plan's Legal compliance in relation to this site.</p>
<p>Soundness</p>

There were no specific comments made on the Plan's soundness in relation to this site.

Modifications

There were no modifications suggested in relation to this site.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

**E11 Annamine Nurseries
Summary of main issues raised**

Legal Compliance

There were no specific comments made on the Plan's Legal compliance in relation to this site.

Soundness

General comments relating to the unsoundness of the site:

It is considered that Policy EC1 insofar as it relates to allocation E11 is unsound it that it omits B1b land uses from the range of suitable employment uses identified.

Modifications

B1b land uses should be included as suitable on this site.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

**E16 – Poppleton Garden Centre
Summary of main issues raised**

Legal Compliance

There were no specific comments made on the Plan's Legal compliance in relation to this site.

Soundness

Specific comments relating to the soundness of the site:

- **Wyevale Garden Centres** support allocation of the site for ‘B’ uses to help meet area’s employment needs. They also support its removal from Green Belt and inclusion within the defined settlement limit of Upper and Nether Poppleton.

Specific comments relating to the unsoundness of the site:

- **Historic England** does not object to the development of part of the site currently occupied by buildings but believe that residential development should not be allowed in the undeveloped area to the south of existing buildings.
- **Nether Poppleton Parish Council** feel that in its current form E16 is unsound and can only be supported if the existing building footprint is used, that the site contributes to York’s historic character, should remain as a valuable attribute to the area and that any other development on the site would act as a coalescence between the York Urban areas and the Green Belt.

One respondent feels that E16 ought not to be overdeveloped and should remain in rural business use.

Modifications

Modifications proposed by respondents include:

- **Wyevale Garden Centres** propose that the words “an element” are removed from policy wording to allow an unrestricted amount of B1a to be brought forward.
- For the plan to be sound, **Historic England** want the extent of the site to be reduced to exclude the garden centre car park and the area to the south of the buildings. Furthermore, they suggest that the impact of development of this site upon SOA14 should be amended to “serious harm”.
- **Nether Poppleton Parish Council** state that for the Plan to be sound the existing building footprint must be used, the site must contribute to York’s historic character and remain as a valuable attribute to the area. Additionally, any other development on the site should act as coalescence between the York Urban areas and the Green Belt.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

E18 Towthorpe Lines, Strensall
Summary of main issues raised

Legal Compliance

There were no specific comments made on the Plan's Legal compliance in relation to this site.

Soundness

Specific comments relating to the soundness of the site:

Julian Sturdy MP

- Pleased that proposal indicates light industry given the character of the area.

Defence Infrastructure Organisation

- Support development of site for up to 13,000 sq.m. of employment floor space.
- HRA supplied post Reg. 18 consultation satisfies habitat and ecology concerns.
- Concept master plan sets out green space suitable for a range of users.
- Support boundary as drawn on Policies North Map.

Specific comments relating to the unsoundness of the site:

Julian Sturdy MP

- Consideration should be given to HGV traffic coming to and from the site and how this will affect Strensall Village.

Defence Infrastructure Organisation

- Errors in CYC SA scoring for objectives 3, 5/6, 8 & 15.

Modifications

Julian Sturdy MP

- Propose that an entry access road to the site, avoiding SSSI land, could provide an effective access route.

Defence Infrastructure Organisation

- Site should be expanded to include potential for B1(a) and B1(b) uses to diversify market attractiveness and improve deliverability.

Proposed changes to CYC SA Scores:

- Objective 3: '+/0'
- Objective 5/6: '1/0'
- Objective 8: '-'
- Objective 15: '-'

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

EC2: Loss of Employment Land	<ul style="list-style-type: none"> Some responses stated that more clarity is required on what is “compelling evidence to demonstrate that the site is no longer needed” and what is meant by “significant changes in the economic circumstances of the district”.
EC3: Business and Industrial Uses within Residential Areas	<ul style="list-style-type: none"> The soundness of the policy is questioned as it does not recognise type of business that is incompatible with residential areas e.g. York Business Park has car sale businesses with high security next to an elderly care home which causes disruption.
EC4: Tourism	<ul style="list-style-type: none"> York Racecourse considers this policy inconsistent within greenbelt designation that prevents their ambitions for expansion / hotel; Similarly one rep mentions Sim Balk Lane as potential for developing more out-of-centre hotel capacity; One comment expressing concern about loss of coach parking.
EC5: Rural Economy	<ul style="list-style-type: none"> Some respondents consider that the aspirations and objectives of this policy are constrained by green belt policies.
R1: Retail Hierarchy and Sequential Approach	<ul style="list-style-type: none"> York Designer Outlet somewhat concerned the policy restricts their potential to grow, especially in regards to parking spaces. Support the existing Park and Ride being re-located to land south of the Designer Outlet. Some support the existing Park and Ride being re-located to land south of the Designer Outlet as parking is an issue at busy times.
R2: District and Local Centres and Neighbourhood Parades	<ul style="list-style-type: none"> One objection to the use of ‘neighbourhood parades’ in the plan and the implications, inconsistent with NPPF
R3: York City Centre Retail	<ul style="list-style-type: none"> No specific comments to this policy.
R4: Out of Centre Retailing	<ul style="list-style-type: none"> Some major retail compendiums raise concerns that the retail policies restricts their potential to grow; One objection to Designer Outlet being designated as greenbelt. One objection to out-of-centre retailing in general because of the traffic it causes.
Section 5: Housing	

H1 (Policy): Housing Allocations	<ul style="list-style-type: none"> • The vast majority of objections and proposed modifications are from developers and landowners stating that the current allocations are insufficient to meet the city’s housing need and proposing their site is included in the plan. In addition, various developers warn the plan is not sufficiently flexible with an over-reliance on too few, too large sites. • Many residents raised specific objections to individual allocated sites, citing the impact on the Green Belt and lack of infrastructure in most cases. Many feel that the plan identifies too many allocations on green field sites. • Many developers and landowners, along with York Diocesan Board of Finance, question the reliance on windfall sites and their inclusion in the housing trajectory. Some consider assumptions on windfall sites overly optimistic and others are opposed to including windfall sites in the housing trajectory in principle. • Various developers and landowners question why student housing is included as a contribution towards meeting the city’s housing need when DCLG’s household projections, upon which the OAHN is based, does not include them. • Many developers and landowners question the prioritisation of brownfield land and the ability of the council to demonstrate a five year land supply even with the low OAHN. They stress that the five year land supply is a minimum requirement and the council should not be treating this as a ceiling and holding back land that is suitable for development. • CPRE North Yorkshire considers the policy sound, although they have some concerns that housing developments in Pocklington and Stamford Bridge (East Riding of Yorkshire), Green Hammerton (Harrogate Borough Council) and within Selby District may have detrimental impacts on the setting and infrastructure of York. A few developers and landowners express concern that although cross-boundary issues have been discussed with neighbouring authorities under the Duty to Co-operate, they remain unresolved.
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H1 site – Former Gas Works, Heworth Green
Summary of main issues raised
Legal Compliance
No specific comments were made on the Plan’s Legal compliance in relation to this site.
Soundness
No specific comments were made on the Plan’s soundness in relation to this site.
Modifications

Proposed modifications include:

- **Historic England** stress the plan should make clear that any elements that contribute to the significance of the Heworth Green / East Parade / Huntington Road Conservation Area will not be harmed by development.
- **Heworth Green Gasworks Ltd** request that the phasing and capacity of the site is re-assessed as development could be brought forward in the short term. A new outline application is to be submitted later this year.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

H5 site – Lowfield School

Summary of main issues raised

Legal Compliance

The following comments on the Plan's Legal Compliance are made in relation to this site:

- **Save Lowfields Playing Field Action Group** write that the council failed to consult impartially.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **Save Lowfields Playing Field Action Group** consider the plan unsound as the allocation of this site for housing development is in direct contradiction with policies on retaining sports facilities.

Modifications

Proposed modifications include:

- **Save Lowfields Playing Field Action Group** note that the site is incorrectly represented on the Policies Map as part of the site is currently open space.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

H6 site – Land r/o The Square, Tadcaster Road

Summary of main issues raised

Legal Compliance

No specific comments were made on the Plan's Legal compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **The Wilberforce Trust** supports the allocation, however feel the Plan is not sound in that, at present, 1.53 hectares of the land within the Trust's ownership is allocated for residential extra care (C3b) facilities, but should extend to include a further 0.5 hectares of land to the north, which lies to the east of St Leonards Hospice; further, that the housing allocation should be re-designated from a C3(b) use class to C3(a).

Modifications

Proposed modifications include:

- Land within the **Wilberforce Trust's** ownership should be allocated for residential extra care (C3b) facilities, including a further 0.5 hectares of land to the north, which lies to the east of St Leonards Hospice;
- **The Wilberforce Trust** - the housing allocation should be re-designated from a C3(b) use class to C3(a).

SID 215 The Wilberforce Trust

Proposed alternative boundary.



H7 site – Bootham Crescent
Summary of main issues raised

Legal Compliance

No specific comments were made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Persimmon Homes** consider the plan sound in regards to site H7 and support the allocation for housing.

Modifications

No modifications were requested in relation to this site.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

H10 site – The Barbican
Summary of main issues raised

Legal Compliance

No specific comments were made on the Plan's Legal compliance in relation to this site.

Soundness

No specific comments were made on the Plan's soundness in relation to this site.

Modifications

Proposed modifications include:

- **Historic England** stress the plan should make clear that any elements that contribute to the significance of the City Walls and the Central Historic Core Conservation Area will not be harmed by development. The plan should also set out specific parameters for the design of any buildings in this sensitive area.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

H29 site – Land at Moor Lane, Copmanthorpe

Summary of main issues raised

Legal Compliance

No specific comments were made on the Plan's Legal compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Barratt Homes** fully support proposed allocation of this site.
- Local residents consider the plan to be sound but request density of development is reduced.

Modifications

Proposed modifications include: See Alternative Site 976 (part of previouslt considered site 789)

- **Copmanthorpe Parish Council** along with *multiple local residents* request that the density of development is reduced to that in policy CNP2 of the draft Neighbourhood Plan (25 per h/a). This will ensure development is in-keeping with the area and that local infrastructure is not overwhelmed.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

H31 site – Eastfield Lane, Dunnington

Summary of main issues raised

Legal Compliance

No specific comments were made on the Plan's Legal compliance in relation to this site.

Soundness

Those comments feel this site raises a number of soundness issues, including:

- *A few residents* consider the Plan unsound, raising concerns about increase in traffic and subsequent congestion, road safety and parking issues. Particular concern about the junction between Eastfield Lane and Church Balk.
- *One resident* considered the plan unsound, objecting to the use of green belt land for the development itself and the likely necessary access road.

Modifications

Proposed modifications include:

H38 site – Land R/O Rufforth Primary School Summary of main issues raised

Legal Compliance

No specific comments were made on the Plan's Legal compliance in relation to this site.

Soundness

Respondents that consider the plan unsound in regards to this site:

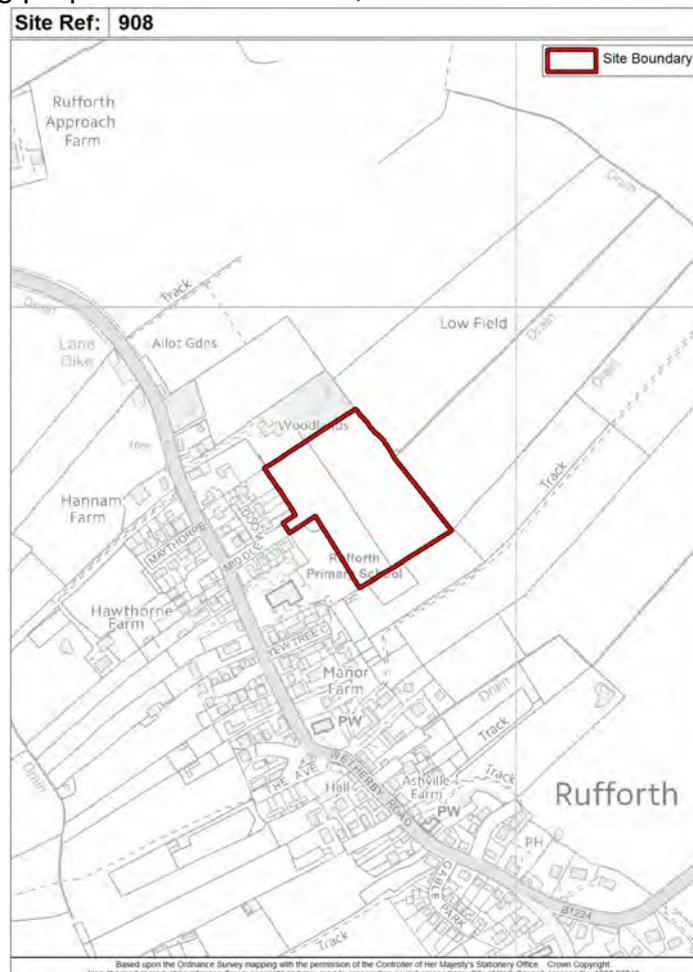
- **Linden Homes** consider the overall plan unsound. The H38 extension does not perform any green belt purposes and should be allocated to help meet the city's housing need. This would help ensure sufficient land is allocated and the plan is found sound.

Modifications

Proposed modifications include:

- *Linden Homes* propose an extended site boundary.

Site plan showing proposed modifications, where relevant:



H39 site – North of Church Lane, Elvington

Summary of main issues raised

Legal Compliance

Some local residents comment on the Plan's Legal Compliance in relation to this site, stating:

- On multiple occasions the land has been found to serve green belt purposes and that views of residents have been consistently ignored.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **Mr and Mrs Sunderland and Mr and Mrs Wilson** support the inclusion of the site but state the overall plan is unsound as current land allocations will not meet York's housing need.
- **Elvington Parish Council** and **Keep Elvington Rural** share the above concerns.
- Many local residents consider the plan unsound, concerns about this site are mostly about impacts of increased traffic and how removing land from the greenbelt would harm the character of Elvington. Multiple responses mention flooding on Church Lane and poor drainage of the site. A need for four/five bedroom homes and affordable housing is also mentioned.
- One local resident questioned the soundness of the overall SA methodology, scoring and monitoring of land removed from the green belt.

Modifications

Proposed modifications include:

- **Elvington Parish Council** and **Keep Elvington Rural** along with many residents propose removing H39 from the plan in favour of H26 Dauby Lane as this would unite the two halves of the village and traffic would have a lesser impact on existing residents.
- **Elvington Parish Council** and **Keep Elvington Rural** request altering the density of any development at the site to be commensurate with the existing Becksides estate.
- A couple of residents suggest the site be removed and the size of ST15 be increased.

Site plan showing proposed modifications, where relevant:

Mr and Mrs Sunderland and Mr and Mrs Wilson would like to see allocation H39 extended – see alternative site 976

H46 site – Land to the North of Willow Bank and East of Haxby Road, New Earswick

Summary of main issues raised

Legal Compliance

No specific comments were made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **Joseph Rowntree Housing Trust** fully supports the allocation of this site as it can help meet the city's housing need. However they consider the overall plan unsound as it does not allocate sufficient land to meet the city's housing need, does not allocate sufficient small and medium sized sites not does it allocate a green belt boundary correctly.
- **New Earswick Parish Council** object to allocation of this site as development will lose the last remaining area of green space and the necessary infrastructure will not be delivered. At present there are already three approved developments that will add to the strain on local services / infrastructure.
- One local resident objects to the loss of open space and raised concerns about traffic, drainage and flooding.

Modifications

Proposed modifications include:

- **Historic England** stress the plan should make clear that any elements that contribute to the significance of the New Earswick Conservation Area will not be harmed by development.
- One local resident suggests the site be removed as an allocation and retained for recreational use.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

H52 site – Willow House EPH

Summary of main issues raised

Legal Compliance

No specific comments were made on the Plan's Legal Compliance in relation to this site.

Soundness

No specific comments were made on the Plan's soundness in relation to this site.

Modifications

Proposed modifications include:

- **Historic England** stress the plan should make clear that any elements that contribute to the significance of the City Walls and York Central Historic Core Conservation Area will not be harmed by development.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

H53 site – Land at Knapton Village**Summary of main issues raised****Legal Compliance**

No specific comments were made on the Plan's Legal compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Novus Investment** consider the plan to be sound and support this allocation for housing.

Respondents that consider the plan unsound in regards to this site:

- **Julian Sturdy MP** and a few local residents stress that the site has been found to serve green belt purposes in the past, most recently in 2016. They object due to the damage development would do to the green belt and character of a historic village.

Modifications

Proposed modifications include:

- **Julian Sturdy MP** and a few local residents request that the allocation be removed from the plan in order to protect the greenbelt.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

H56 site – Land at Hull Road
Summary of main issues raised

Legal Compliance

No specific comments were made on the Plan's Legal compliance in relation to this site.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **Save Windmill Lane Playing Fields** take issue with the SA for this site, mostly about HIA and lack of strategic environmental assessment. Goes on to argue mistakes have been made with the site selection methodology and that allocation of the site contradicts plan policies on protection of sporting facilities.

Modifications

Proposed modifications include:

- **Save Windmill Lane Playing Fields** request the site is removed from the plan as an allocation for housing.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

H58 site – Clifton Without Primary School
Summary of main issues raised

Legal Compliance

No specific comments were made on the Plan's Legal Compliance in relation to this site.

Soundness

No specific comments were made on the Plan's soundness in relation to this site.

Modifications

Proposed modifications include:

- **Historic England** stress the plan should make clear that any elements that contribute to the significance of the Clifton (Malton Way and Shipton Road) Conservation Area will not be harmed by development.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

<p>H2 (Policy): Density of Residential Development</p>	<ul style="list-style-type: none"> • Some respondents question how the proposed densities have been calculated. It is argued that high densities will result in flatted development which is not needed in York; • Some feel that development densities in York City Centre and York Urban Area are optimistically high; • Supporting text needs to reference those elements that relate to gross and net densities e.g. open space, water attenuation etc; • Some feel that the densities are too high for rural villages and that urban brownfield sites should take even higher densities.
<p>H3 (Policy): Balancing the Housing Market</p>	<ul style="list-style-type: none"> • Whilst some respondents support the flexibility provided in relation to housing mix, other suggest that greater flexibility is required on a site-by-site basis; • Some raise concerns that the Plan includes several student sites in its future supply, which is inappropriate, as there is no justification regarding how these developments will result in the release of housing into the general housing market • It is felt by some that there is insufficient provision, protection and availability of social housing;
<p>H4 (Policy): Promoting Self and Custom House Building</p>	<ul style="list-style-type: none"> • Some developers feel that the Plan does not provide evidence and justification that supports 5% of plots on sites of 5 ha and above; • There is no evidence to suggest that people wanting to build their own home would want to live within a larger housing development; • The proposed approach only changes the type of house and does not contribute to boosting the supply of housing.
<p>H5 (Policy): Gypsies and Travellers</p>	<ul style="list-style-type: none"> • Several comments generally support the Plan's approach to the provision of sites to meet the needs of Travellers. Some state that they are grateful that the Council have listened and previously proposed allocated sites have been removed. Some feel that policy H5 does not reflect national policy; • Amongst other respondents, York Travellers Trust consider the Plan neither legally compliant nor sound in underestimating G+T need, and that it fails its duties under the 2010 Equality Act by not allocating sites. • It is highlighted by several developers that the provision of pitches for travellers as part of strategic housing allocations is an unusual approach and request that clarification should be provided as to how demand for pitches within new housing developments has been assessed and how this may compare with opportunities for individual pitches in the existing urban areas; • The policy should specifically recognise that the requirement for pitches will be kept under regular review and ensure that sites remain available to travellers; • It is argued that no detail is given on how the commuted sum

	towards the development of land would be calculated.
H6 (Policy): Travelling Showpeople	<ul style="list-style-type: none"> • Some respondents support the policy and consider that full consideration for the needs of Travelling Showpeople has been assessed; • It is considered by some that site SP1 is unsound as it constitutes 'inappropriate development in the Green Belt'; • Other support the allocation, stating that it meets the needs identified in the evidence base.

H6 (SP1) – The Stables, Elvington Summary of main issues raised

Legal Compliance

The following comments on the Plan's Legal Compliance are made in relation to this site by *local residents*:

- The site does not comply with National Planning Policy for Travellers Sites or Green Belt.
- Local residents have not been properly consulted.
- Site has been granted only temporary (5yr) consent
- NPP requires 'fair and equal treatments for travellers' not preferential treatment – no member of the settled community would be given permission to occupy the green field site.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **Elvington Parish Council** and many local residents consider the plan unsound, they refer to the site's green belt status, which was the subject of a previous Planning Appeal, with the Planning Inspectorate granting only temporary consent to occupy the site; that there are alternative brownfield sites in the vicinity; that residents have not been properly consulted; concern around traffic and visual impacts of the site.
- **Elvington Parish Council** and many local residents stress the Plan should consider reasonable alternatives.
- One local resident considers the Plan sound and feels that full considerations of the needs of travelling show people have been assessed and sites considered in the preferred options and further sites consultations. SP1 will deliver a site for travelling show people and meet a long outstanding need.
- A few local residents consider that the Plan should be rejected and taken over by National Government.

Modifications

Proposed modifications include:

- **Elvington Parish Council** and many local residents request the allocation be removed and the site returned to green belt

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

**H7 (Policy):
Student Housing**

- Several comments state that the Plan needs to make clear that Student Housing sits outside the OAN and Housing Supply;
- It is highlighted that there is no mention of the increase in potential student accommodation at Askham Bryan College;
- Some feel that the University of York, York St John University and Askham Bryan College should, to avoid further unbalance of the housing market in the areas of York close proximity to their campuses, be required to accommodate all increased numbers of students on campus;

**SH1 Student Housing site – Land at Heworth Croft
Summary of main issues raised**

Legal Compliance

No specific comments were made on the Plan’s Legal compliance in relation to this site.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **Environment Agency** note this site has an area designated as functional floodplain (Flood Zone 3b (FZ3b)) in the current Strategic Flood Risk Assessment. Only essential infrastructure and water compatible development should be located in FZ3b.

Modifications

Proposed modifications include:

- **Environment Agency** recommends distinguishing between the areas of allocation for Open Space and Student Housing, with open space only, allocated in FZ3b. Alternatively, provide a clear statement that the sequential approach site layout must be used on this site. CYC have suggested the plan will cross reference Flood Risk Policy ENV4 to cover this issue. We recommend that this is referenced in Policy H7: Student Housing.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

H8 (Policy): Houses in Multiple Occupation	<ul style="list-style-type: none"> • Some feel that the policy needs strengthening; and • The policy should contain a restriction on extensions to existing and proposed HMOs.
H9 (Policy) : Older Persons Specialist Housing	<ul style="list-style-type: none"> • Some feel that whilst house builders can provide elderly persons housing under C3, the provision of extra care housing as a C2 class is more complex and policy H9 requires further clarification on what is required in terms of numbers and types and a demonstration of need.
H10 (Policy): Affordable Housing	<ul style="list-style-type: none"> • Some consider that the plan does not provide enough housing to meet projected need nor does it provide enough affordable housing; • Others generally support the provision of affordable housing and maintain that urban extensions provide the opportunity to help meet affordable housing requirements across the city; • Clarification is sought as to as to where off-site contributions from rural sites will go;
Section 6: Health and Wellbeing	
HW1: Protecting Existing Facilities	<ul style="list-style-type: none"> • Majority of respondents made reference to the fact that the issue of the retention and re-use of existing community assets is of the utmost importance in the delivery of the plan and that a reinforcement of these issues is needed in the policy; • Many respondents noted that the policy is not robust enough, particularly in respect of evidence required to support the use/reuse of a facility.
HW2: New Community Facilities	<ul style="list-style-type: none"> • Majority of respondents feel that the evidence base and viability assessment needs to be more rigorous and robust and that developer contributions and the types of facilities should be made clearer;
HW3: Built Sports Facilities	<ul style="list-style-type: none"> • Many respondents feel that more clarity is needed with regard to developer contributions and viability assessments;
HW4: Childcare Provision	<ul style="list-style-type: none"> • Majority of respondents feel that further clarification on the level of contribution required is needed; • Some of the respondents felt that that issues with evidence base and viability assessment needed addressing; • Many of the respondents objected to strategic sites being required to undertake an audit and believe that this is responsibility of the local authority;
HW5: Healthcare	<ul style="list-style-type: none"> • Majority of respondents objected to the requirement that a

Services	developer is required to undertake an assessment of accessibility and capacity at the application stage and that further detail on the extent of developer contributions is required.
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HC1 York NHS Hospital Trust and HC2 Haxby Road – Healthcare Services (relates to policy HW5)

Summary of main issues raised

Legal Compliance

No specific comments were made on the Plan’s Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **Langwith Development Partnership** does not object to policy HW5 in principle however it is not appropriate for the Plan to derogate the responsibility of assessing the community infrastructure of the City to individual applications. Therefore they do object policy HW5 in its current form as it is not supported by adequate, up to date and relevant evidence. At present there is no evidence base to support the infrastructure required.

Modifications

No specific comments were made regarding proposed modifications to the Plan in relation to this site.

Site plan showing proposed modifications, where relevant:

No proposed modifications to boundary.

HW6: Emergency Services	<ul style="list-style-type: none"> • Majority of respondents feel that further clarification on the level of developer contribution required is needed;
HW7: Healthy Places	<ul style="list-style-type: none"> • Majority of the respondents objected to the requirement that sites are selected on the grounds of being sustainable, that the need for such an assessment is negated by the allocation and that the policy should be deleted; • Some respondents feel that the HIA should be submitted with planning applications, not prior to them.
Section 7: Education	

<p>ED1: University of York ED2: Campus West ED3: Campus East</p>	<ul style="list-style-type: none"> • Support for the Plan’s recognition of the role of the city’s Universities. • Some concern that the Plan does not provide sufficient land for the University of York to grow; • Some respondents feel that policies ED1, ED2 and ED3 should be consolidated into one policy and reworded to reflect NPPF requirements; • It is considered by some that any proposals for development at the university should mitigate their impact on housing, traffic and parking.
<p>ED4: York St. John University Lord Mayor’s Walk Campus</p>	<ul style="list-style-type: none"> • General support was received in relation to this policy.
<p>ED6: Preschool, Primary and Secondary Education ED7: York College and Askham Bryan College ED8: Community Access to Sports and Cultural Facilities on Education Sites</p>	<ul style="list-style-type: none"> • Several respondents feel that further detail and clarification on the level of developer contribution is required; • Some respondents feel that there are issues with schooling and impact on road infrastructure that need addressing;
<p>Section 8: Placemaking, Heritage, Design and Culture</p>	
<p>D1: Placemaking</p>	<ul style="list-style-type: none"> • Some of the respondents feel that the policy should include a caveat so that it is subject to deliverability and viability considerations and that any potential harm should be assessed against wider benefits;
<p>D2: Landscape and Setting</p>	<ul style="list-style-type: none"> • Many of the respondents have made reference to the fact that the policy make reference to York Landscape Character Appraisal and that they cannot locate it and request that City of York Council provide it in the Evidence Base Document.
<p>D3: Cultural Provision</p>	<ul style="list-style-type: none"> • Several developers object to the request that strategic sites will need to demonstrate that future cultural provision has been considered and provide a Cultural Wellbeing Plan as they believe this is a task only City of York Council can perform; • The policy is fully supported by some in relation to the promotion and protection of theatres.
<p>D4: Conservation Areas</p>	<ul style="list-style-type: none"> • Some of the respondents feel that the policy does not accord with the NPPF; • It is considered by some that more clarity should be provided to define the level of detail required at outline planning

	application stage for sites within or adjacent to conservation areas in terms of full design details required.
D5: Listed Buildings	<ul style="list-style-type: none"> The policy is generally supported as it is in alignment with the NPPF.
D6: Archaeology	<ul style="list-style-type: none"> The policy is generally supported.
D7: The Significance of Non-Designated Heritage Assets	<ul style="list-style-type: none"> Some consider that there is an absence of commitment from the Council to protect the city's non-designated heritage assets in the policy.
D8: Historic Parks and Gardens D9: City of York Historic Environment Record D10: York City Walls and St Mary's Abbey Walls D11: Extensions and Alterations to Existing Buildings D12: Shopfronts	<ul style="list-style-type: none"> The policies are generally supported.
D13: Advertisements	<ul style="list-style-type: none"> Some argue that the policy is unlawful and over-prescriptive. It is felt by some that a reference to temporary advertising, especially in reference to conservation areas should be added.
D14: Security Shutters	<ul style="list-style-type: none"> The policy is supported.
Section 9: Green Infrastructure	
G11: Green Infrastructure	<ul style="list-style-type: none"> Several respondents feel that the policy needs further detail and clarification on the level of developer contribution is required; Some respondents made site specific comments in relation to the policy and how revision of wording and revisions to the policies map is needed.
G12: Biodiversity and Access to Nature	<ul style="list-style-type: none"> Several respondents feel that the policy needs further detail and clarification on the level of developer contribution is required; Some respondents feel that the policy should include Local Nature Reserves as the NPPF does not have any specific mention of protecting these sites.
G13: Green Infrastructure Network	<ul style="list-style-type: none"> Several respondents feel that the policy needs further detail and clarification on the level of developer contribution is required;

GI4: Trees and Hedgerows	<ul style="list-style-type: none"> • General support for the policy; • Several developers question as to why developer contribution is required to protect existing trees and hedgerows.
GI5: Protection of Open Space and Playing Fields	<ul style="list-style-type: none"> • Several responses relate to specific sites and areas of green space, such as the area surrounding Clifford's Tower. • Some of the respondents question as to why developer contribution is required to protect existing pitches from development.
GI6: New Open Space Provision	<ul style="list-style-type: none"> • Some of the respondents feel that clarification of the level of developer contribution is required; • Some of the respondents made objection to the policy in relation to OS10. They believe that the proposal goes against the NPPF, would compromise the SSSI and has no evidence supporting its scale and location; • Some of the respondents have raised issue with the wording and accuracy of the policy. They feel that provision for open space should not be left to the developer alone but in consultation with the local communities. • Some of the respondents made Strategic Site specific responses and feel that there should be clarification of the relationship between OS sites and ST sites and that it would be prudent to insert the current standard for calculating recommended open space in new developments in the supporting text. Some of the respondents outright object to open space provision on ST7, ST8, ST9 and ST35.

New Open Spaces

- **OS10: New Area for Nature Conservation on land to the South of A64 in association with ST15**
- **OS11: Land to the East of ST31**
- **OS12: Land to the East of ST35**

Summary of main issues raised

Legal Compliance

No specific comments were made on the Plan's Legal compliance in relation to this site.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **Langwith Development Partnership** consider (OS10) the scale of open space proposed as part of the ST15 development unjustified and not supported by evidence, ultimately undeliverable.
- **Heslington Parish Council** object to the land for OS10 being taken out of arable production (because of the ST15 development). Doubt that the

mitigation measures will be sufficient to avoid negative impacts on nearby SSSI and SINCS sites.

- **NFU** require more information on the full implications of the OS10 designation. The land is currently productive and the tenant farmer working the land has not been involved in the process, because of this they have not been able to respond to this consultation from an informed position.
- **Gladman Developments** agree with the wording of policy GI6 outlining that the precise delineation and extent of new open space should be set through detailed master planning. Attached to the rep is a site plan showing planned extent of OS11.
- **Defence Infrastructure Organisation** object to the allocation of OS12, this blanket approach without a clear evidence base is unlikely to be effective in meeting its objectives.
- One local resident requests more information on the implications of OS10 being designated a nature conservation site as opposed to its current use as managed conservation farmland. Also requests full justification for the ST15 development.
- Two local residents object to OS10 designation and the loss of arable farmland, claim this violates paragraph 112 of the NPPF.
- One local resident welcomes the designation of OS10 and the plan in general as an improvement on past drafts.

Modifications

Proposed modifications include:

- **NFU** require clarification as to the full implications of the OS10 designation and how this will impact the current tenant farmer, if at all.
- **Langwith Development Partnership** proposes changes to specific policy wording and supporting text related to OS10.
- **Defence Infrastructure Organisation** request removing the 50:50 development to open space ratio (OS12) and submit an alternative site master plan with increased housing capacity and a 65:35 development to open space ratio. Request many amendments the policy wording and supporting text.
- A few local residents request removal of the OS10 designation (and ST15).

GI7: Burial and

- One of the respondents supports the expansion of current

Memorial Grounds	<ul style="list-style-type: none"> burial grounds; One of the respondents feels that an area for potential burial grounds at Osbaldwick has been overlooked and that it should be identified as a Green Burial Ground.
Section 10: Managing Appropriate Change in the Green Belt	
GB1: Development in the Green Belt	<ul style="list-style-type: none"> The Green Belt policies are generally supported by residents, with many recognising that their adoption will provide will create a Green Belt for York that 'will provide a lasting framework to shape the future development of the city ...' Some landowners believe that the Green-belt designation is unduly restrictive; The green belt policies offer little opportunity for rural businesses, which are not allied to agriculture or forestry, to establish or expand. Historic England support first para criterion iii which will help to ensure that any development in the Green Belt safeguards those elements which contribute to the special character and setting of the historic City. The removal of the 'Major Developed Sites' designation restricts the overall flexibility of the Racecourse to continue to adapt and remain competitive. policy fails in its stated aims of encouraging the development of renewable energy by not identifying sites that are suitable for renewable energy.
GB2: Development in Settlements within the Green Belt	<ul style="list-style-type: none"> Villages where there are clear settlement lines that have been established should not have these lines altered. Hedgerows and mature trees which help as a visual aid to these boundaries should be protected. Desk research alone will not give evidence.
GB3: Reuse of Buildings	<ul style="list-style-type: none"> Criterion (vii) of Policy GB3 is inconsistent with national (NPPF) policy and does not reflect Class Q permitted development regulations which permit the conversion of agricultural buildings to dwellings
GB4: 'Exception' Sites for Affordable Housing in the Green Belt	<ul style="list-style-type: none"> Policy GB4 needs to reflect NPPF which states that exceptions allow housing to be built on Green belt land if it is <i>entirely</i> affordable housing, not <i>partly</i> affordable housing;
Section 11: Climate Change	
CC1: Renewable and Low Carbon Energy Generation and Storage	<ul style="list-style-type: none"> Several developers feel that energy requirements for new housing developments are solely the remit of Building Regulations and CYC should not be imposing more onerous requirements on developments.
CC2: Sustainable Design and Construction	<ul style="list-style-type: none"> Some consider that the requirement to achieve a BREEAM 'excellent' rating is unduly restrictive; requirements should be revised to achieve a 'Very Good' rating instead.

CC3: District Heating and Combined Heat and Power Networks	<ul style="list-style-type: none"> • There are objections to the Policy being applied to strategic housing on the basis that the Policy lacks clarity as to whether it applies to major residential schemes.
Section 12: Environmental Quality and Flood Risk	
ENV1: Air Quality	<ul style="list-style-type: none"> • Whilst many support this policy, some feel that the policy are inadequate with regards to air quality; • Many respondents highlight the impact that traffic congestion has on air quality; • Several respondents suggest ways of strengthening this policy including the requirement for air quality assessments in areas of the city when large amounts of development are proposed; • Several developers seek further detail and clarification on the extent of developer contribution in relation to strategic sites.
ENV2: Managing Environmental Quality	<ul style="list-style-type: none"> • General support for this policy.
ENV3: Land Contamination	<ul style="list-style-type: none"> • General support for this policy.
ENV4: Flood Risk	<ul style="list-style-type: none"> • Whilst many support this policy, some respondents consider that policy ENV4 fails to tackle, and are in danger of exacerbating, existing drainage and surface water issues; • Several developers seek further detail and clarification on the extent of developer contribution.
ENV5: Sustainable Drainage	<ul style="list-style-type: none"> • Some respondents consider that policy ENV5 fails to tackle, and are in danger of exacerbating, existing drainage and surface water issues; • Some consider that investment in better drainage systems must be made before this plan is justified; • A point is raised that no reference is made to an assessment of the capacity of existing sewer and stormwater drainage systems in the broad area of the development; • The issue of brownfield/greenfield sites is raised. • Several developers seek further detail and clarification on the extent of developer contribution.
Section 13: Waste and Minerals	
WM1: Sustainable Waste Management	<ul style="list-style-type: none"> • Detailed minerals and waste policies are contained in the Minerals and Waste Joint Plan. Any policies in the York Local Plan must ensure that they are consistent with strategic policies in the MWJP. • A minor factual update is required in paragraph 13.3 which states that AWRP will become commissioned in early 2018. However, the site became fully operational at the end of January 2018 therefore this paragraph requires updating to reflect the current status of the site.
WM2:	<ul style="list-style-type: none"> • Detailed minerals and waste policies are contained in the

Sustainable Minerals Development	Minerals and Waste Joint Plan. Any policies in the York Local Plan must ensure that they are consistent with strategic policies in the MWJP.
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Section 14: Transport and Communications	
T1: Sustainable Access	<ul style="list-style-type: none"> • Policy T1 fails to meet requirements of Para 17 of NPPF - the needs of disabled and those with mobility issues/impairments are not considered; • Whilst all the policy objectives relating to transport, such as contributing to economic vitality, public health protection of the natural environment and improved access for the transport disadvantaged etc, can be found throughout the Plan they are not consistently presented as a justification for the transport policies in the Plan; • The design standards and policy thresholds referred to are not yet specified as they are to be contained in Supplementary Planning Documents which are awaited, so it is not possible to judge the potential effectiveness, and hence soundness, of the Local Plan; • Policy supported in principle, but elements within it relating to Site ST5 York Central are considered unsound; • No analysis has been undertaken on potential improvements (other than those already included in the plan);
T2: Strategic Public Transport Improvements	<ul style="list-style-type: none"> • Further detail on the extent of developer contributions should be made. • An Infrastructure Delivery Plan has been not available to be read alongside the Local Plan and so how can residents and businesses be confident that infrastructure proposals are sufficiently detailed and feasible; • The transport policies contain several qualifications which risk undermining the effectiveness of the plan; • The transport policies are based throughout on the Local Transport Plan 2011-2031 (LTP3) which is out of date; • The city's infrastructure will not be able to accommodate any more than 867 new homes each year;
T3: York Railway Station and Associated Operational Facilities	<ul style="list-style-type: none"> • Further detail on the extent of developer contributions should be made.
T4: Strategic Highway Network Capacity	<ul style="list-style-type: none"> • Proposed developments along the A1237 ring road corridor, render the plan unsound as the sustainable transport infrastructure to support these developments would, at a minimum, involve grade separated junctions

Improvements	<p>on the overloaded A1237, and without significant government or regional funding this will never be economically viable;</p> <ul style="list-style-type: none"> • Further detail on the extent of developer contributions should be made. • The city's infrastructure will not be able to accommodate any more than 867 new homes each year; • The transport policies are based throughout on the Local Transport Plan 2011-2031 (LTP3) which is out of date; • Some consider that current upgrades to the A1237 outer ring road are inadequate;
T5: Strategic Cycle and Pedestrian Network Links and Improvements	<ul style="list-style-type: none"> • The Transport Topic Paper (and Plan) is informed by an outdated transport model that fails even to mention cycling or cycling infrastructure; • The Local Plan is not consistent the National Cycling and Walking Investment Strategy 2017, in that measures outlined within it are not sufficient to meet the overall aim of that Strategy; • The list of strategic cycle and pedestrian improvements is incomplete and fails to address key inadequacies in the connectivity and capacity of the current networks; • The transport policies are based throughout on the Local Transport Plan 2011-2031 (LTP3) which is out of date;
T6: Development at or Near Public Transport Corridors, Interchanges and Facilities	<ul style="list-style-type: none"> • Further detail on the extent of developer contributions should be made.
T7: Minimising and Accommodating Generated Trips	<ul style="list-style-type: none"> • Further detail on the extent of developer contributions should be made. • The design standards and policy thresholds referred to are not yet specified as they are to be contained in Supplementary Planning Documents which are awaited, so it is not possible to judge the potential effectiveness, and hence soundness, of the Local Plan;
T8: Demand Management	<ul style="list-style-type: none"> • Policy T8 Demand Management is wholly inadequate, particularly when set against the prediction of a 55% increase in congestion. There is a much wider range of demand management measures available; • Further detail on the extent of developer contributions should be made. • There is insufficient consideration of freight in the Plan; • The projected increase in travel time and peak hour congestion is not acceptable; • Policy supported in principle, but elements within it relating to Site ST5 York Central are considered unsound;

T9: Alternative Fuel Fuelling Stations and Freight Consolidation Centres	<ul style="list-style-type: none"> • Further detail on the extent of developer contributions should be made. • There is insufficient consideration of freight in the Plan;
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C1: Communications Infrastructure	<ul style="list-style-type: none"> • The policy should require refurbishment and new development schemes to be future proofed to facilitate the provision of mobile, broadband and wireless communications infrastructure, including in the public realm and within private buildings.
Section 15: Delivery and Monitoring	
DM1: Infrastructure and Developer Contributions	<ul style="list-style-type: none"> • Note the requirement for developers to provide necessary infrastructure to mitigate against local impacts but this isn't set out in the policy, just the justification and it is suggested that these should be incorporated in the actual policy; • The viability work currently being undertaken by CYC needs to be vigorously tested, working with the development industry, including an assessment of the cumulative impact on viability; • Whilst the text to support DM1 makes an attempt to draw the relevant policies referencing developer contributions, it must be acknowledged that they all make demands which would in the main be covered by CIL.

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Former ST11 – Land at New lane Huntington

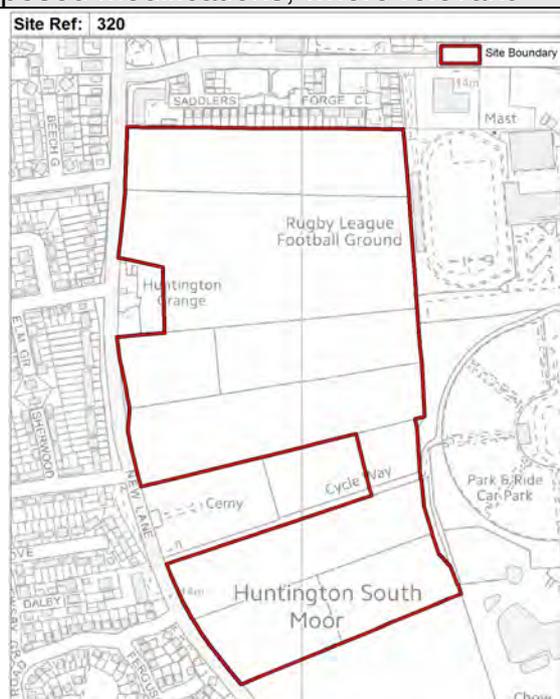
Summaries

SID 125 - Persimmon Homes - Alternative Site - New Lane, Huntington (Former ST11) - New Lane, Huntington - rep goes into detail on green belt criteria in relation to the site, argues for its inclusion. Concludes with - The site should be allocated for residential development in accordance with the boundaries of ST11 in the halted 2014 Local Plan to make a deliverable site and thus contribute to meeting the City's widespread housing needs. 13.7 hectares, 336 dwellings, Short to Medium Term.

SID 339 - Barton Willmore OBO Baratt David Wilson Homes – It is noted that the Council continue to omit our Clients sites – New Lane, Huntington (ref: ST11). It is suitable and deliverable and could come forward early in the plan period. Given the need for the Council to deliver a higher housing requirement, in line with their own evidence base, the site should be allocated for residential purposes.

SID 595 - Paul Butler Planning OBO Barratt and David Wilson Homes - Object to former ST11 being rejected as a potential housing option within CYC's Publication Draft Local Plan. The site represents one of the most sustainable locations for new residential development in the City, benefits from strong defensible boundaries, and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. We believe that there is a compelling case for the release of additional land as housing allocations within the CYC Local Plan in order to meet the City's full objectively assessed housing needs. Consequently, the New Lane, Huntington proposals have the potential to provide up to 250 new homes, public open space, green wedges and associated infrastructure. See also supporting evidence provided by Barton Willmore for this site together with previous reps on this site.

Site plan showing proposed modifications, where relevant



Former ST12 –Land at Manor Heath Copmanthorpe

Summaries

SID 209 – ELG Town Planning OBO Askham Bryan College - The opportunity posed by the development of this site (ST12) is unique. Askham Bryan College is the landowner of the site and consequently the funds from the development proposals will be used directly to enhance investment in the provision of education within the City, a key objective of the Council's strategy for a future prosperous City. This is supported by Policy DP1 and ED7 within the Publication Draft (February 2018) whereby the contribution of the college towards the economic growth and provision of Education within the City and wider region is acknowledged and supported in terms of its future expansion.

SID 259 – Paul Butler Planning OBO David Wilson Homes - Land at Manor Heath Copmanthorpe (Part of which is owned by Askham Bryan and development would contribute to funding this)) should be removed from the green belt and allocated for housing.

SID 339 – Barton Willmore OBO Baratt David Wilson Homes – It is noted that the Council continue to omit our Clients sites – Manor Heath, Copmanthorpe (ref:ST12). It is suitable and deliverable and could come forward early in the plan period. Given the need for the Council to deliver a higher housing requirement, in line with their own evidence base, the site should be allocated for residential purposes.

SID 598 – DPP Planning OBO Linden Homes Strategic Land – Site 872 / formerly ST12 Manor Heath, Copmanthorpe should be allocated in the plan for housing or as safeguarded land. (Further detail provided in rep)

SID 613 - Directions Planning Consultancy Ltd OBO Askham Bryan College – Site passed site selection criteria at Preferred Options but has since been removed from the Plan. The current reasons relating to the Green Belt were not considered relevant to exclude this site at PO; it has been consistently allocated for development in the past. Additional land should be allocated to address housing need such as 'ST12: Land at Manor Heath, Copmanthorpe' in order to provide sufficient land to accommodate an increased housing target.

Site plan showing proposed modifications, where relevant

Former ST13 - Moor Lane, Copmanthorpe

Summary

SID 600 - DPP Planning OBO Shepherd Property Group - Site 131 - (formerly ST13) Moor Lane, Copmanthorpe should be allocated in the plan for housing. The site can contribute to meeting the city's housing need and make the plan sound without doing harm (further detail provided in rep).

Site plan showing proposed modifications, where relevant



Former ST29 - Land to the South of Boroughbridge Road

Summary

SID252 – Arcus Consulting OBO Cobalt Housing York Ltd - It is our view that the reinstatement of the allocation of land to the south of Boroughbridge Road ('the Site') for housing would help to ensure the delivery of an effective housing development on the edge of the City of York boundary. The Site would help meet government targets on the delivery of new housing and its inclusion would demonstrate an understanding of the importance of deliverable housing sites as a central component of the new local plan.

Although the new local plan identifies this area as Green belt land, it is evident that this area of land does not display the characteristics necessary for Green belt designation, and as such it should not reasonably be classified as Green belt for the purposes of this local plan. The 2016 Greenbelt Assessment Addendum, which assesses the reasons for the sites removal as a housing allocation, concludes that the site does not fulfil these functions as laid out in the Preferred Options Consultation. Specifically, the Addendum states that:

- The Site does not impinge upon the setting of York. It is 3 kilometres away from the historic core of the city, and is surrounded by other largely developed areas, and as such will does not serve this greenbelt purpose; and
- The Site does not impede on greenbelt rules that aim to ensure that towns and cities do not merge. – No Plan provided land assumed to relate to Former ST29

Site plan showing proposed modifications, where relevant

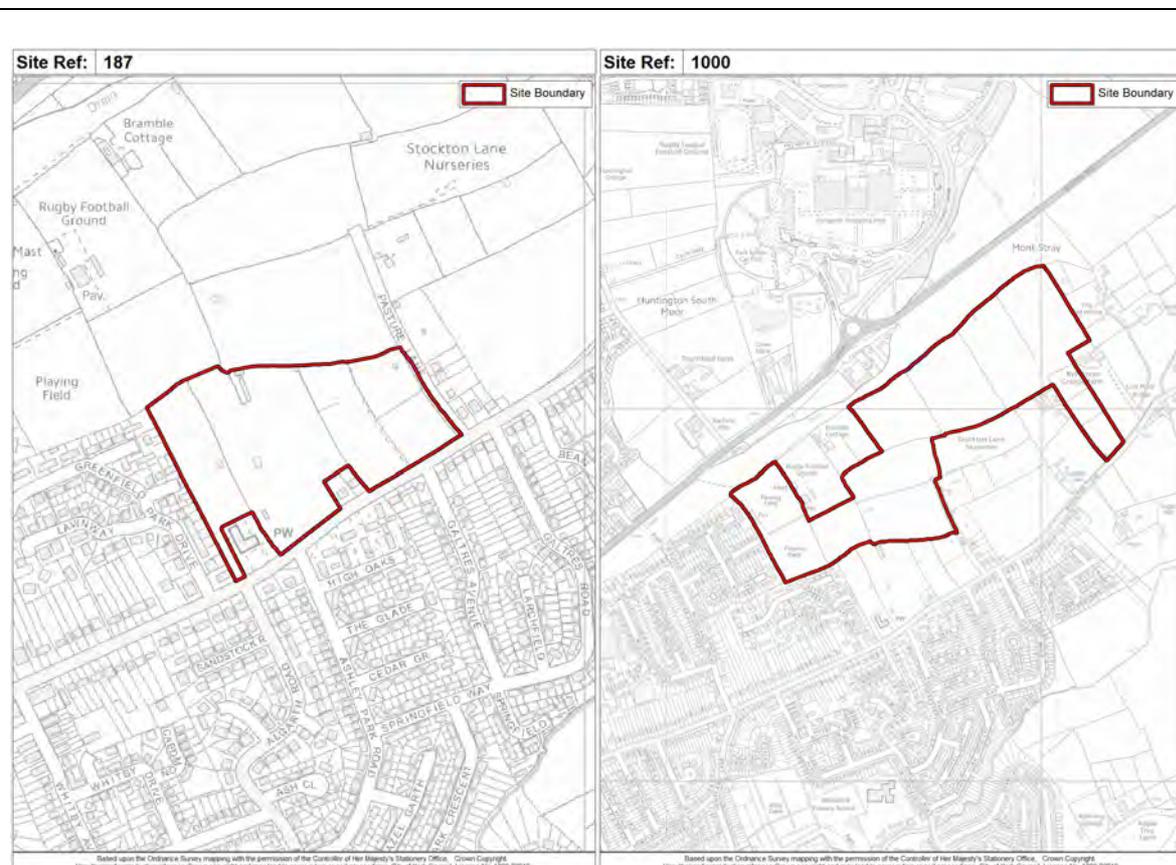


Former ST30 - Land North of Stockton Lane and Wider Site

Summary

SID602 – DPP Planning OBO Strata Homes LTD - Site 187 (formerly ST30) Land North of Stockton Lane and The Wider Site (Site 1000 – Part Previously Considered under Ref 316) - should be allocated in the plan for housing or as safeguarded land. The sites can contribute to meeting the city's housing need and make the plan sound without doing harm as well as providing an improved sporting facility of the City of York Hockey Club and Heworth Cricket Club (further detail provided in rep).

Site plan showing proposed modifications, where relevant



Former Site H2a - Land off Tadcaster road – Racing Stables,

Summary

SID122 – Turnberry Consulting Ltd OBO of York Racecourse- The COYC are relying on around 169 dwellings each year to be delivered through windfall development sites. The Racecourse is constantly reviewing its Estate and there are two sites which could conceivably accommodate residential accommodation in order to meet the Objectively Assessed Need of the City of York through windfall development. Rep goes on to provide detail about the 'Stables Site' (Alt site 988)

Site plan showing proposed modifications, where relevant



Former H26 - land at Dauby lane Elvington

Summary

SID102 – Elvington Parish Council - Alternative housing site
SID598 - DPP Planning OBO Linden Homes Strategic Land - Planning OBO Linden Homes Strategic Land - H26 Dauby Lane should have been included before H39 in order to help meet the city's housing need. Should have been included in the plan either as an allocation or safeguarded land (rep goes into further detail). - Former site H26 Dauby Lane should be allocated.

Site plan showing proposed modifications, where relevant



Former H27 - Land at the Brecks Strensall

Summary

SID210 - Litchfields OBO Wakeford Properties Ltd - The site was previously allocated in the emerging Local Plan. It is incorrect for the Council to now rely on the conclusions reached by the SoS and Inspector in relation to a call-in Inquiry to justify the deletion of Brecks Lane as a housing allocation. The SoS and Inspector's decision was made in an entirely different context to its proposed allocation and does not preclude a proper consideration of whether the site should be located within the Green Belt and its contribution to Green Belt purposes. Land at Brecks Lane is a suitable site for housing development that would have no unacceptable environmental impacts or create unacceptable impacts upon amenity of new and existing residents. There are no insurmountable constraints to the site or its development and is deliverable within the next five years. Site allocations put forward would fail to deliver a housing supply sufficient to achieve the sustainable growth of the City. It is therefore important for the Council to allocate additional land, particularly the site at Brecks Lane, to meet the housing needs of the community.

Site plan showing proposed modifications, where relevant



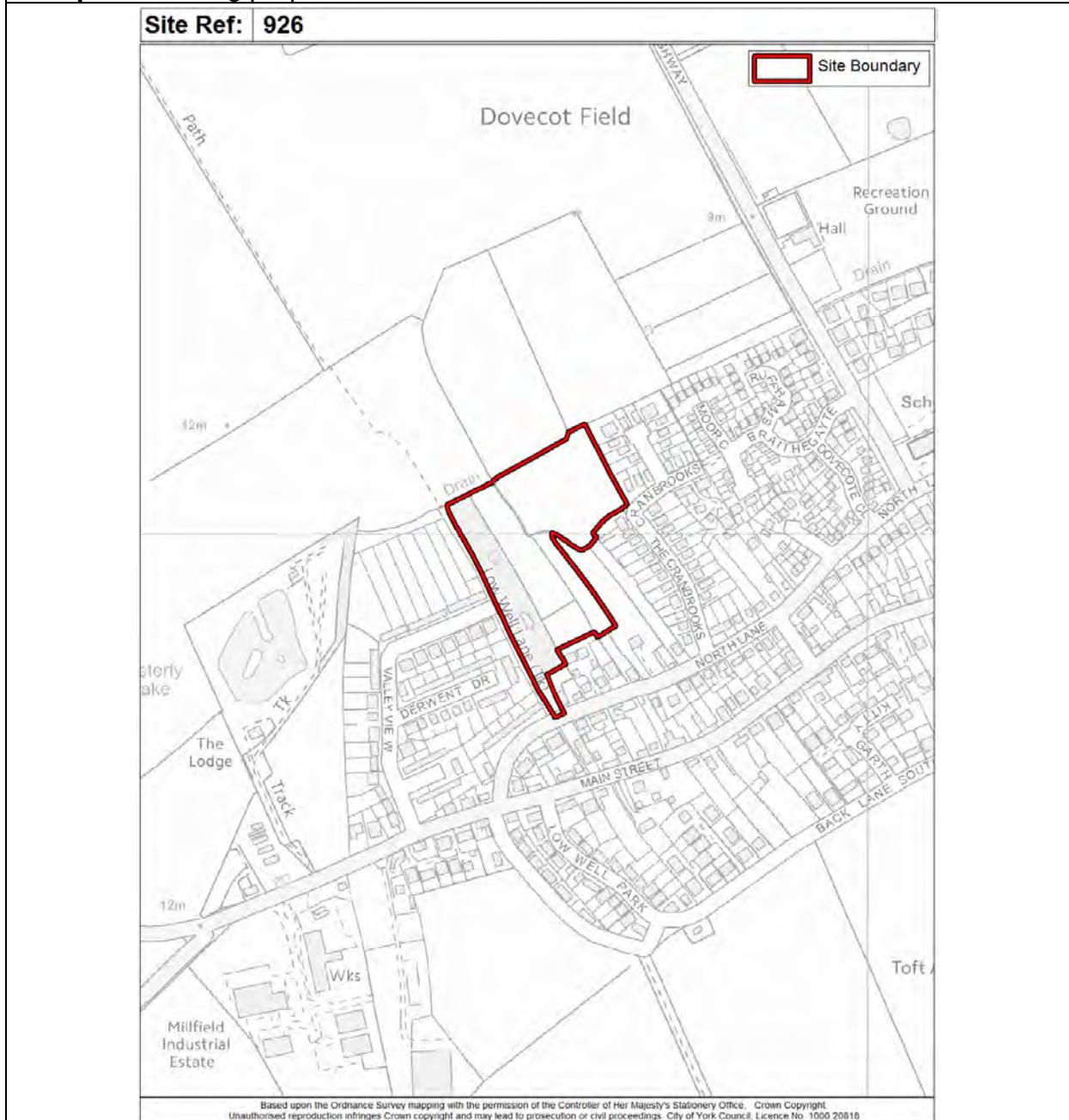
Former H28 - North of North Lane, Wel Drake

Summary

SID598 – DPP Planning OBO Linden Homes Strategic Land - Site 926 - (formerly H28) North Lane, Wheldrake should be allocated in the plan for housing. The site can contribute to meeting the city's housing need and make the plan sound without doing harm (further detail provided in rep).

SID598 – Thomas Pilcher Homes - Site H28 is an obvious site for inclusion which is superior to current allocations.

Site plan showing proposed modifications, where relevant



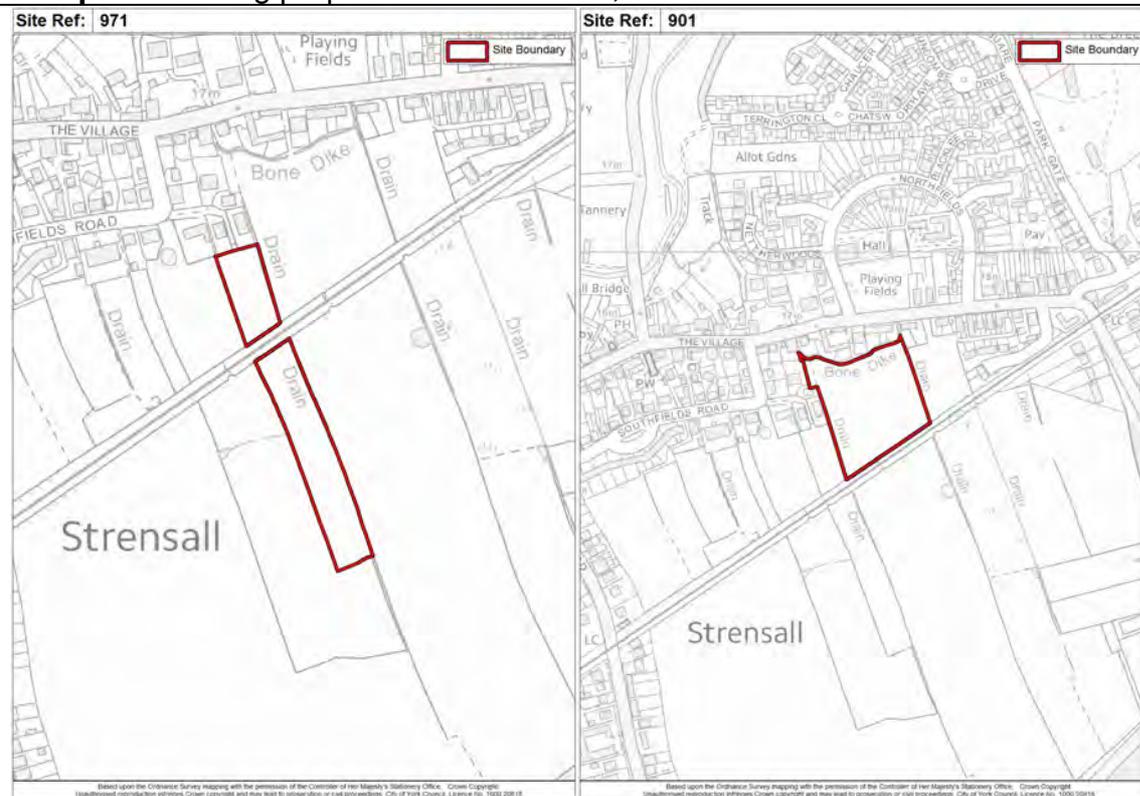
Former H30 – Land South of Strensall

Summary

SID210 - Litchfields OBO Wakeford Properties Ltd – It is considered that the site at Southfields Road Strensall, represents a sustainable location for housing development. It is suitable, available and achievable for residential development for market and affordable dwellings and there are no insurmountable constraints to delivering housing on the site. The site is able to come forward for development in the short-term (years 1 – 5) and therefore represent a deliverable site as defined by the Framework. In order to assist the Council in delivering its housing land requirement it is considered that the site at Southfields Road, Strensall should be allocated for housing development and brought forward for development in the short term. If the site is not identified for allocation it should be identified as Safeguarded Land. - -Site 971 Part of Former site H30 and SF1.

SID260 - Pegasus Group OBO Lovell Developments - Former site H30 and SF1. The Land to the South of Strensall is made up of a parcel of land which covers an area of approximately 29 hectares. The site is located outside the development limits of Strensall however is bounded by residential development to the west, the railway line to the north, residential properties to the east and adjoining Flaxton Road to the south. The site is a greenfield site currently used for agricultural purposes. Mature planting exists on some of the site boundaries, particularly to the southern boundary along Flaxton Road. The site whilst currently located in the open countryside and outside the development limits of the village, is relatively central in relation to Strensall village centre and has good access to village facilities and service. This makes it a sustainable site. The site is located within Flood Zone 1, and accommodates no other site specific constraints. – Site 901

Site plan showing proposed modifications, where relevant

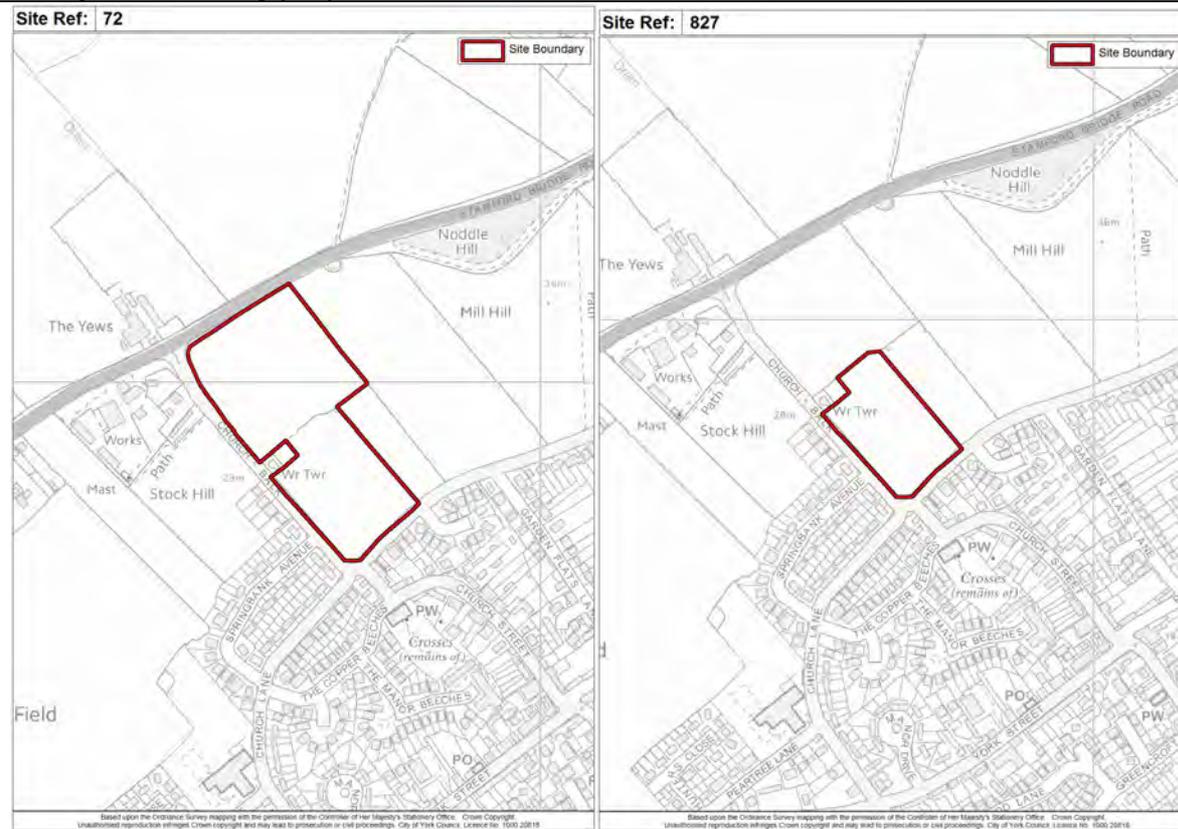


Former H33 - Land at the Water Tower, Dunnington

Summary

SID592 – O'Neill Associates OBO Yorvik Homes - H33 Land to the south of the water tower, Dunnington should be re-allocated in the plan for housing development. The site is suitable for development as demonstrated by the council's own evidence base and the fact it has been allocated for housing in the past. H33 could contribute towards meeting the housing need of the city. Two boundaries are proposed the original previous allocation 1.8ha and the extended wider site 2.4ha. The sites are put forward for housing and associated uses such as parking and openspace..

Site plan showing proposed modifications, where relevant



Former H34 - Site 903 - Land North of Church Lane, Skelton

Summary

SID601 – DPP Planning OBO Private landowner- Site 903 - (formerly H34 Land north of Church Lane) should be allocated in the plan for housing or as safeguarded land. The site can contribute to meeting the city's housing need and make the plan sound without doing harm (further detail provided in rep).

Site plan showing proposed modifications, where relevant



Former H37 – Land to the South of Greystones Court Haxby

Summary

SID91 - Strathmore Estates OBO of Westfield Lodge and Yaldara - H37 Land adjacent to Greystones Court Haxby should be re-instated. Rep goes into great detail about the history of H37 at various consultation stages in the past

Site plan showing proposed modifications, where relevant

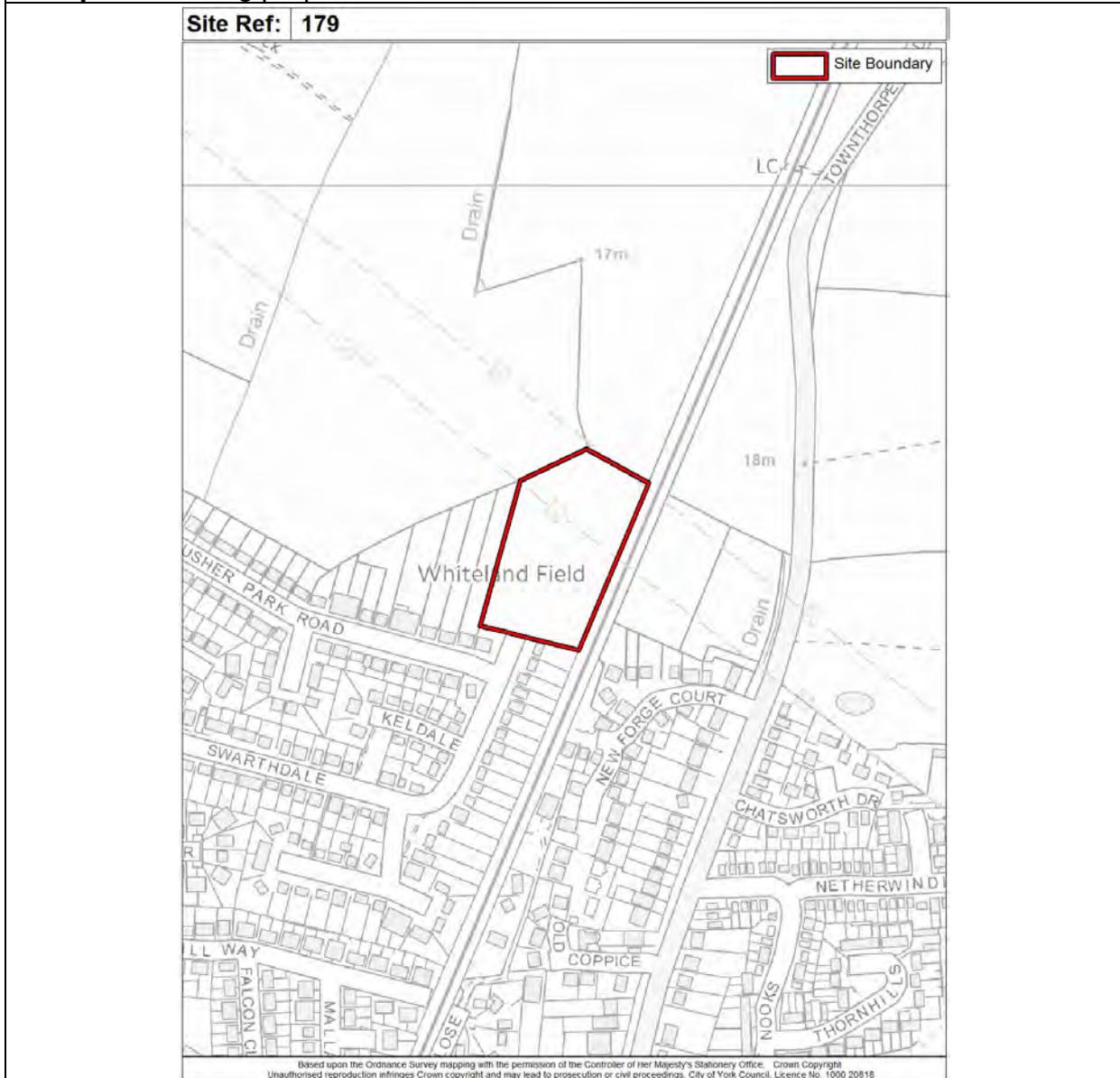


Former H49 – Whiteland Field, Usher Park Haxby – check H54

Summary

SID125 – Persimmon Homes - Alternative site - Whiteland Field/Usher Park Road (Former H49). Whiteland Field, Usher Park Road, Haxby - rep goes into detail on green belt criteria in relation to the site, argues for its inclusion. Concludes with - Whiteland Field does not meet any the Green Belt criteria and should be allocated for residential development. Persimmon Homes previously has put forward a number of reports in support of its allocation including transport, services, archaeology and masterplan. Persimmon owns the land and is keen to progress development of the site once a satisfactory planning position has been obtained. The site should be allocated for residential development to make a rational Green Belt boundary and provide a deliverable site and to contribute to meeting the City's widespread housing needs. 1.3 hectares, 49 dwellings, Short term.

Site plan showing proposed modifications, where relevant



Former H50 - Site 180 land at Malton Road

Summary

SID607 – Litchfields Obo Taylor Wimpey - Allocate land at Malton Road (previously H50) for housing. Site is 7.1ha

Site plan showing proposed modifications, where relevant



Former SF1 — Land to the South of Strensall

Summary

SID210 - Litchfields OBO Wakeford Properties Ltd – It is considered that the site at Southfields Road Strensall, represents a sustainable location for housing development. It is suitable, available and achievable for market and affordable dwellings and there are no insurmountable constraints. The site is able to come forward for development in the short-term (years 1 – 5) and therefore is therefore. The site at Southfields Road, Strensall should be allocated for housing development and brought forward for development in the short term. If the site is not identified for allocation for housing it should be identified as Safeguarded Land.- Site 971 Part of Former site H30 and SF1.

SID260 – Pegasus Group OBO Lovell Developments - This site covers approximately 29 hectares and is located outside the development limits of Strensall however is bounded by residential development to the west, the railway line to the north, residential properties to the east and adjoining Flaxton Road to the south. The site is a greenfield site currently used for agricultural purposes. Mature planting exists on some of the site boundaries, particularly to the southern boundary along Flaxton Road. The site whilst currently located in the open countryside and outside the development limits of the village, is relatively central in relation to Strensall village centre and has good access to village facilities and service. This makes it a sustainable site. The site is located within Flood Zone 1, and accommodates no other site specific constraints. - Site 902

SID597 – Paul Butler Planning OBO Private Landowner - Rep goes into further detail but to summarise - housing provision in the Local Plan should be higher and their client's site SF1 Land North of Flaxton Road, Strensall should be included for housing provision. Rep details proposal for 30 homes at density of 30dph that can be delivered in the next five years. – no specific boundary referenced or submitted

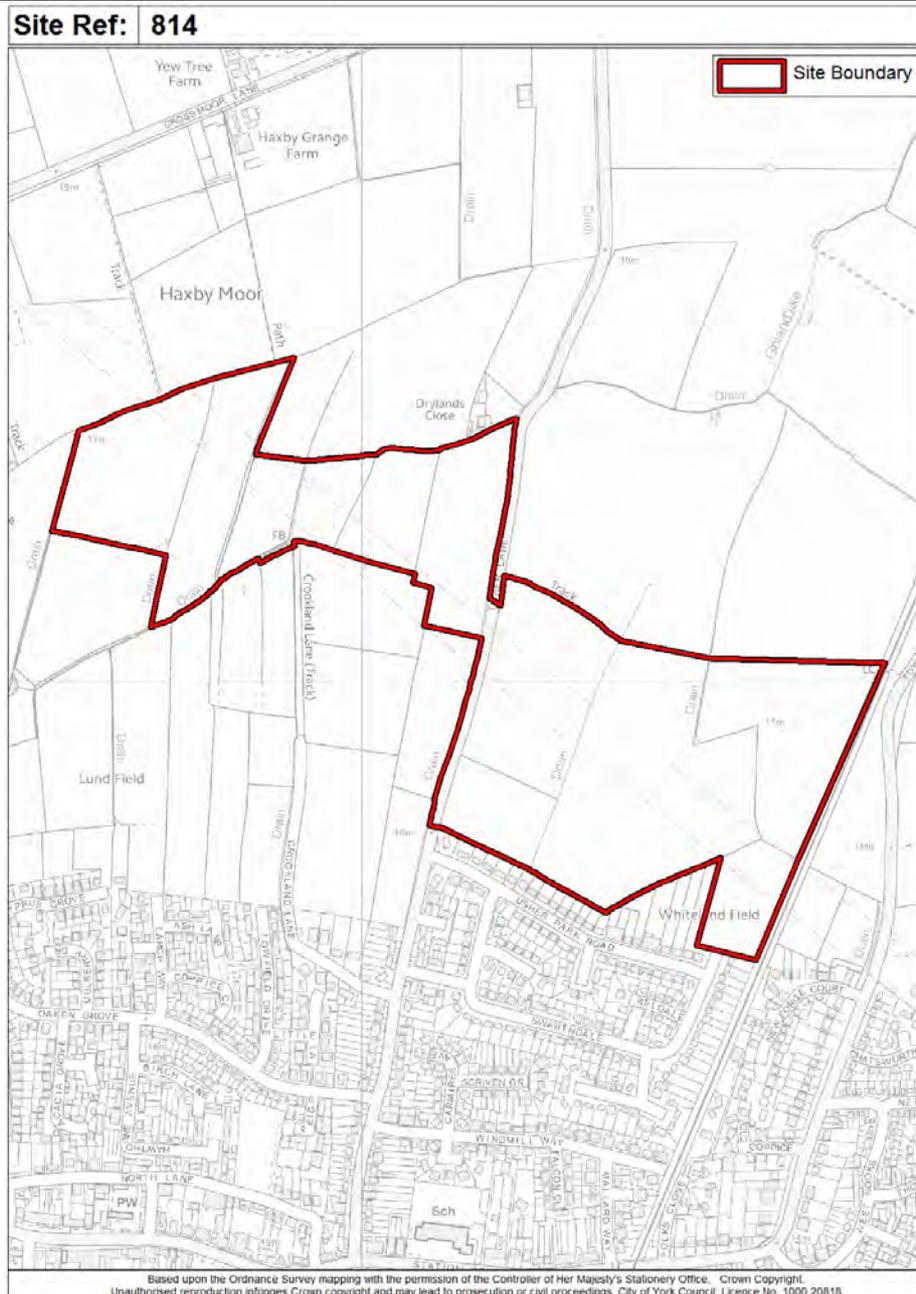
Site plan showing proposed modifications, where relevant

Former SF4 – Site 814 - Land to the North of Haxby

Summary

SID598 – DPP Planning OBO Linden Homes Strategic Land - Site 814 / formerly SF4 Land North of Haxby should be included in the plan as safeguarded land.

Site plan showing proposed modifications, where relevant



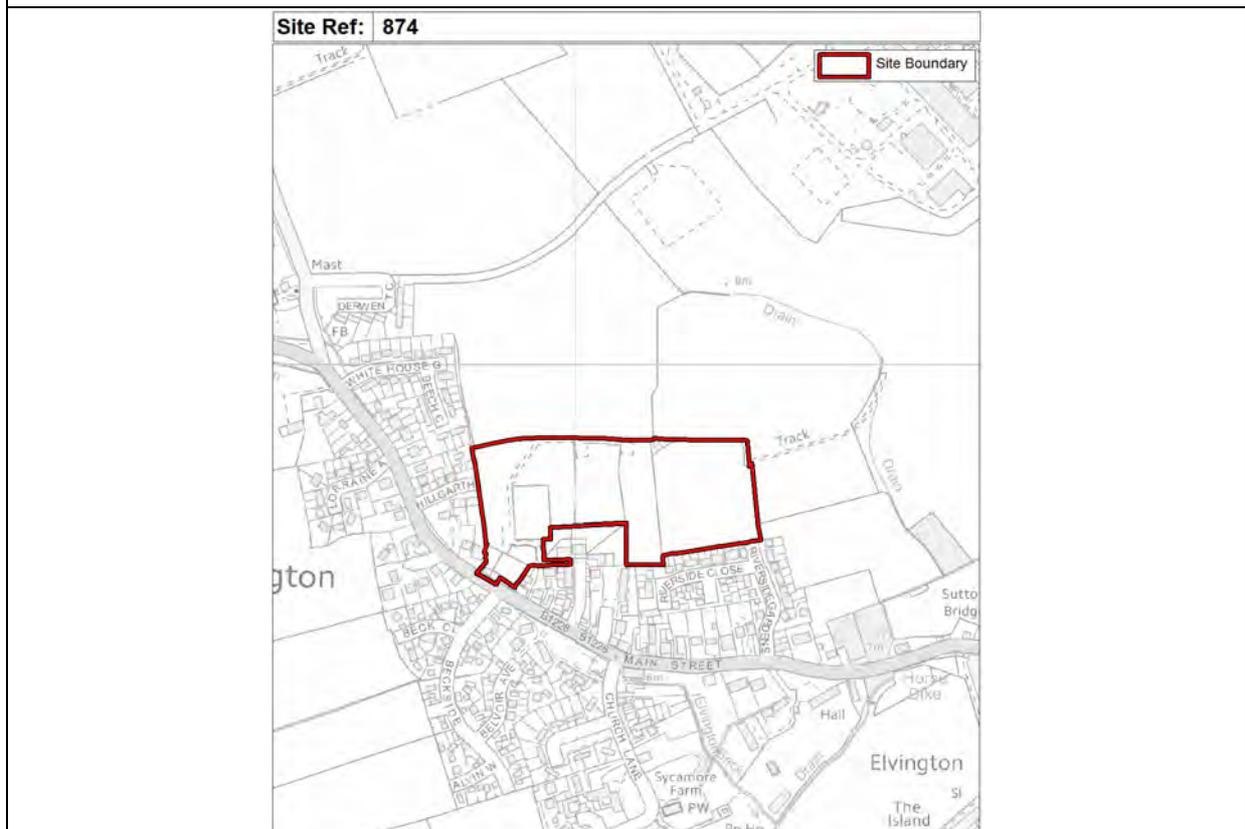
Former SF10 – Land at Riverside Gardens, Elvington

Summary

SID339 – Barton Willmore OBO Baratt David Wilson Homes– It is noted that the Council continue to omit our Clients sites – Riverside Gardens, Elvington (ref: SF10)

SID595 – Paul Butler Planning OBO Barratt and David Wilson Homes - We object to the site (Former SF10: Riverside Gardens Elvington) being rejected as a potential housing option within CYC's Publication Draft Local Plan. The development proposals are situated in a suitable and highly sustainable location there are no technical or environmental (built and natural) constraints that would preclude the development of the site. Additional housing allocations to those currently proposed by CYC will need to be identified in order to meet the City's housing needs over the proposed plan period. Which is why we fully support CYC's Officer's recent recommendation to allocate the site for residential development. Though we would suggest that a quantum of 110 homes be applied to the site. See also supporting evidence provided by Barton Wilmore for this site together with previous reps on this site.

Site plan showing proposed modifications, where relevant



Former SF11 - Wheldrake East Field

Summary

SID836 – Jennifer Hubbard Planning OBO Private Landowner - The site identified as Site 752 on the plan attached to the previous representations dated 30th October 2017 and 1st September 2016 should be identified as a housing site or as safeguarded land in the Local Plan.

Site plan showing proposed modifications, where relevant

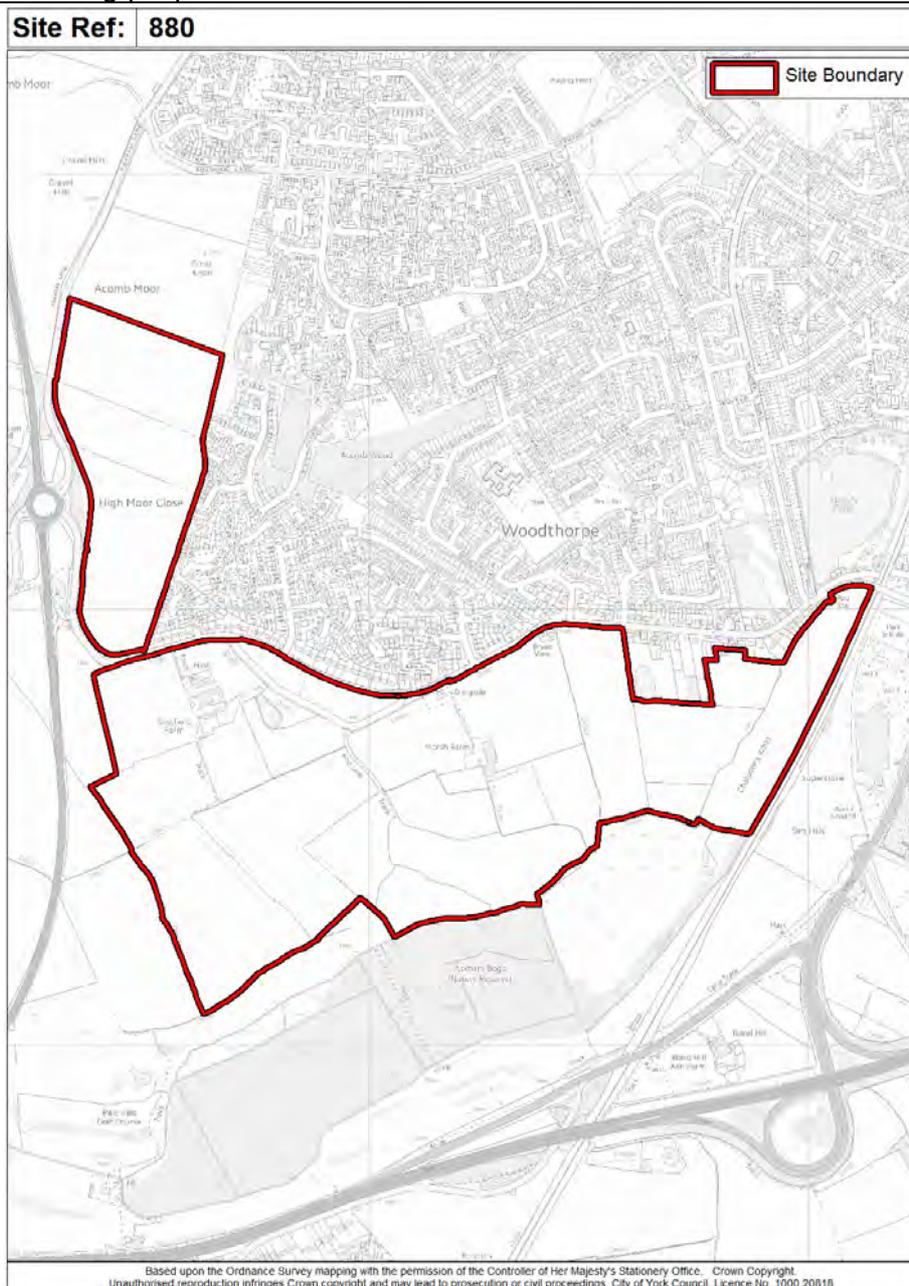


Former SF12 (Previously ST10) –Land at Moor Lane, Woodthorpe

Summary

SID581 – How Planning OBO Barwood Strategic Land LLP -Land at Moor Lane, Woodthorpe (previously ST10) should be allocated for housing. Representation includes extensive supporting evidence.

Site plan showing proposed modifications, where relevant



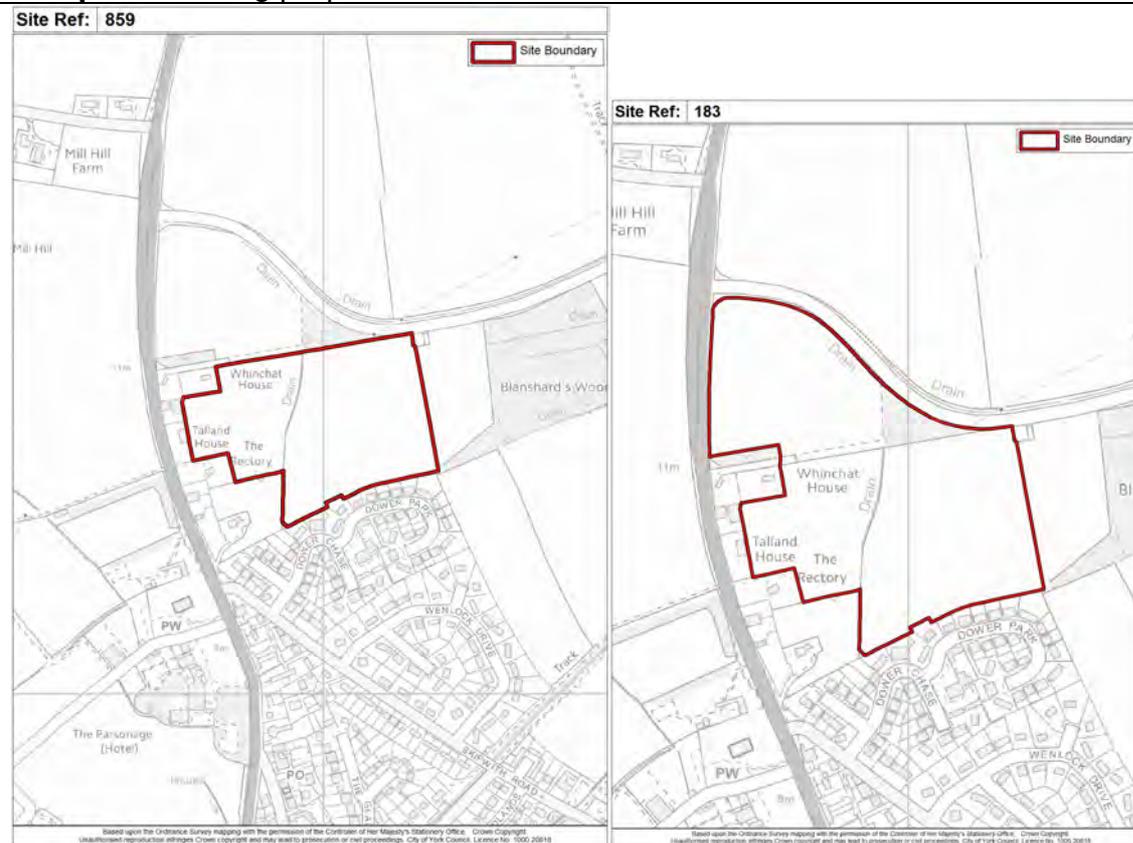
Former SF15 - Land to the North of Escrick

Summary

SID 598 - DPP Planning OBO Linden Homes Strategic Land - Site 859 / formerly SF15 Land north of Escrick should be included in the plan either as a housing allocation or as safeguarded land. – Site 859

SID 837 - Jennifer Hubbard Planning OBO Escrick Park Estates - The green belt boundary should be re-drawn to follow the road leading to the former North Selby Mine and the land between the mine road and Escrick village, as defined in the attached submissions should be allocated for residential development in total or in part and, if the latter, the balance should be identified as safeguarded land. – Site 183

Site plan showing proposed modifications, where relevant



Site 4 - Land At North Lane Huntington

Summary

SID357 – ID Planning OBO Green Developments - It is considered my clients site off North Lane in Huntington is suitable to meet this need given it is in a sustainable location within walking distance of local facilities.

Site plan showing proposed modifications, where relevant



Site 130 - Land at Acomb Waterworks

Summary

SID606 – Litchfields OBO Keyland Developments Ltd- The redundant Yorkshire Water facility located off Landing Lane to the north of Water End in Acomb should be allocated for housing. Extensive supporting evidence provided. Brownfield site capable of delivering 150 apartments. There are options for alleviating flooding on site. Alt site 130.

Site plan showing proposed modifications, where relevant



Site 132 - Land south of Cherry Lane, Dringhouses

Summary

SID587 – O'Neill Associates OBO Shepherd Home - The housing requirement figure for the Plan Period should be increased to at least 1,100 dwellings per annum. Land south of Cherry Lane, Dringhouses is suitable for development and should be included as a housing allocation to help meet the city's housing need (Rep goes into further detail on site suitability, provides evidence.)

Site plan showing proposed modifications, where relevant



Site 170 – Pond Field Heslington

Summary

SID125 – Persimmon Homes- Alternative Site - Pond Field (alt site 170) - it is clear Pond Field does not meet any of the criteria for Green Belt. The reality is that Pond Field is now a field surrounded by development. It has to be inappropriate to seek to retain a field in agricultural use when it is surrounded by development. The Green Belt designation should be removed and Field Lane used to define this part of the inner Green Belt boundary with a rational boundary. The site should be allocated for residential development

Site plan showing proposed modifications, where relevant

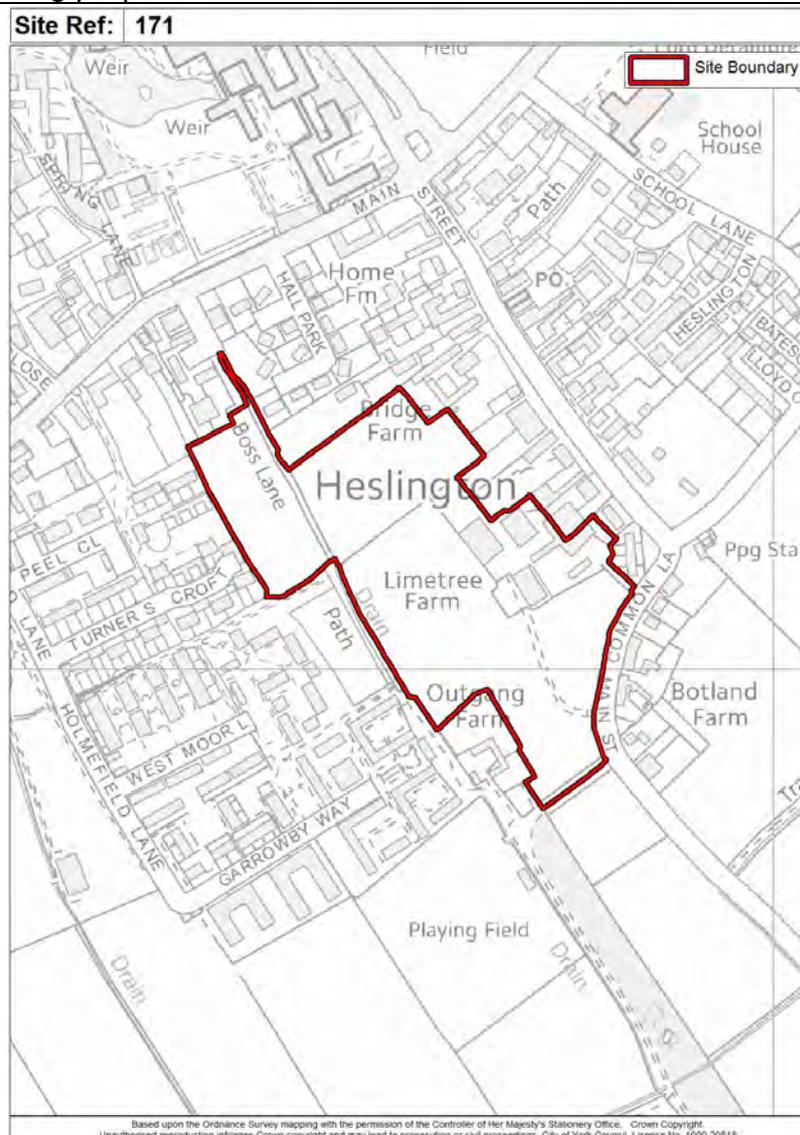


Site 171 - Lime tree farm heslington

Summary

SID125 – Persimmon Homes - Lime Tree Farm, Common Lane, Heslington - rep goes into detail on green belt criteria in relation to the site, argues for its inclusion. Concludes with - Lime Tree Farm does not meet any of the criteria for Green Belt designation. Lime Tree Farm has development on three sides with limited views into it from the southern boundary. The Green Belt designation should be removed and Common Lane used to define this part of the inner Green Belt boundary with a rational boundary. The site should be allocated for residential development to provide a deliverable site and thus contribute to meeting the City's widespread housing needs. 2.7 hectares, 90 dwellings, Short term.

Site plan showing proposed modifications, where relevant



Site 221 - Agricultural Land Sim Balk lane (North)

Summary

SID181 – Gately PLC OBO Gateway Development- Alternative site suggested for the plan as residential development – site 221 - land on the north-eastern side of Sim Balk Lane to the north of the A64;

Site plan showing proposed modifications, where relevant



Site 222 - Agricultural Land Sim Balk lane (South)

Summary

SID181 – Gately PLC OBO Gateway Development- Alternative site suggested for the plan as residential, education, employment (B1a) or hotel uses – site 222 - land on the south-western side of Sim Balk Lane to the north of the A64;

Site plan showing proposed modifications, where relevant



Site 223 - Agricultural Land Copmanthorpe Lane

Summary

SID181 – Gately PLC OBO Gateway Development- Alternative site suggested for the plan for residential – site 223 - land to the west of Bishopthorpe, north of Copmanthorpe Lane;

Site plan showing proposed modifications, where relevant

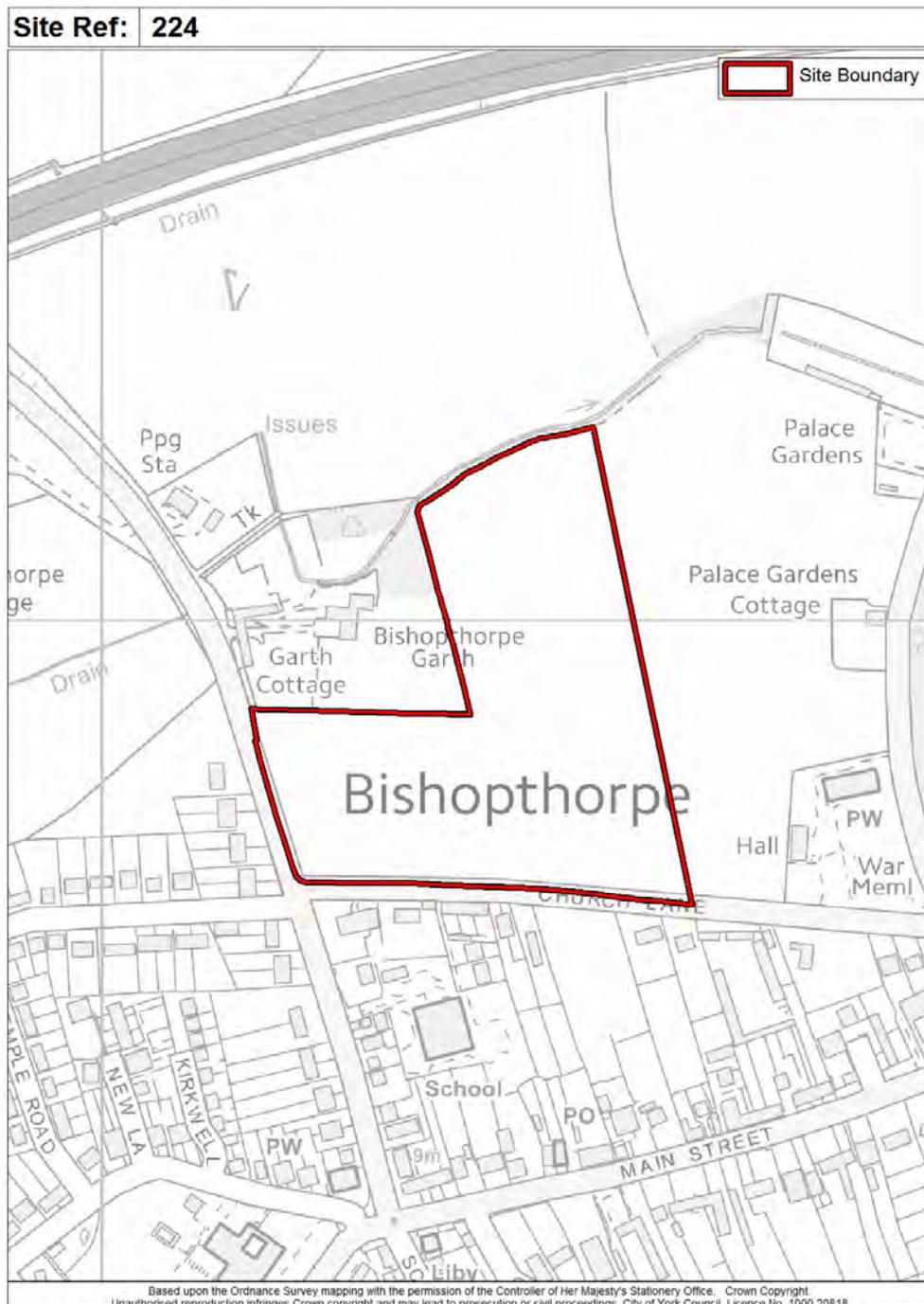


Site 224 - Agricultural Land Church lane

Summary

SID181 – Gately PLC OBO Gateway Development- Alternative site suggested for the plan for residential – site 224 - land to the north of Bishopthorpe, north of Church Lane.

Site plan showing proposed modifications, where relevant



Site 687 - East of Northminster Business Park

Summary

SID605 – Carter Jonas OBO Oakwood Business Park and Private Landowner- Northminster Business Park Allocation ST19 (Policy SS23) should be extended to include Site 687 to the east of Northfield Lane. Site 687 should be released from the General Extent of Green Belt to be allocated for employment land. It currently comprises the former Oakwood Farmhouse and Oakwood Business Park itself, comprising 5 large, portal frame units. The southern part is wholly taken up with caravan storage

Site plan showing proposed modifications, where relevant



Site 726 – Wheatlands

Summary

SID68 – SBO Lands - #1 entire site - Northfield Lane (Triangle) - This is for the overall site but other representations have been submitted relating to individual parcels of land within the larger area encompassed by this representation. Those representations propose the allocation of various plots of land for housing, employment, or a caravan park.

Site plan showing proposed modifications, where relevant



Site 767 - East of the A19 Selby Road

Summary

SID422 – Edward Associates OBO Private Landowners - Site allocation proposed for housing by landowners. Site is east of the A19 Selby Road, north of A64, west of Cherry Wood Crescent (provides map). Approx 2.1ha and is flat agricultural land. No planning history. Has been rejected previously due to fulfilling green wedge function. Considers that it would be possible to retain green edge to site with housing development behind. Accessible site. Other proposed allocations in plan are green belt land. Land is available and deliverable for housing within 5 years.

Site plan showing proposed modifications, where relevant



Site 792 - Land South of Foxwood Lane Acomb

Summary

SID267 – Savills OBO The York and Ainsty Hunt -

SID838 - Savills OBO The York Diocesan Board of Finance –

Land south of Foxwood Lane, Acomb should be removed from the Green Belt and allocated for housing – evidence provided - In response to the three key transportation issues to be considered as part of the process access Suitable access arrangements for vehicles, pedestrians and cyclists can be provided at the development site, as indicated in Drawing A088531/ C001 - Accessibility The site is accessible on foot or by bike to a range of useful local destinations, and - there are public transport options available for journeys further afield. Traffic Impacts The site is expected to generate 68 motor vehicle trips in the AM peak hour and 76 in the PM peak hour. This level of additional traffic is not expected to result in any capacity problems but if necessary, mitigation measures can be delivered. The development site satisfies the key transportation issues, and is suitable for allocation in the City of York Local Development Framework Submission Draft Core Strategy for residential development.

Site plan showing proposed modifications, where relevant



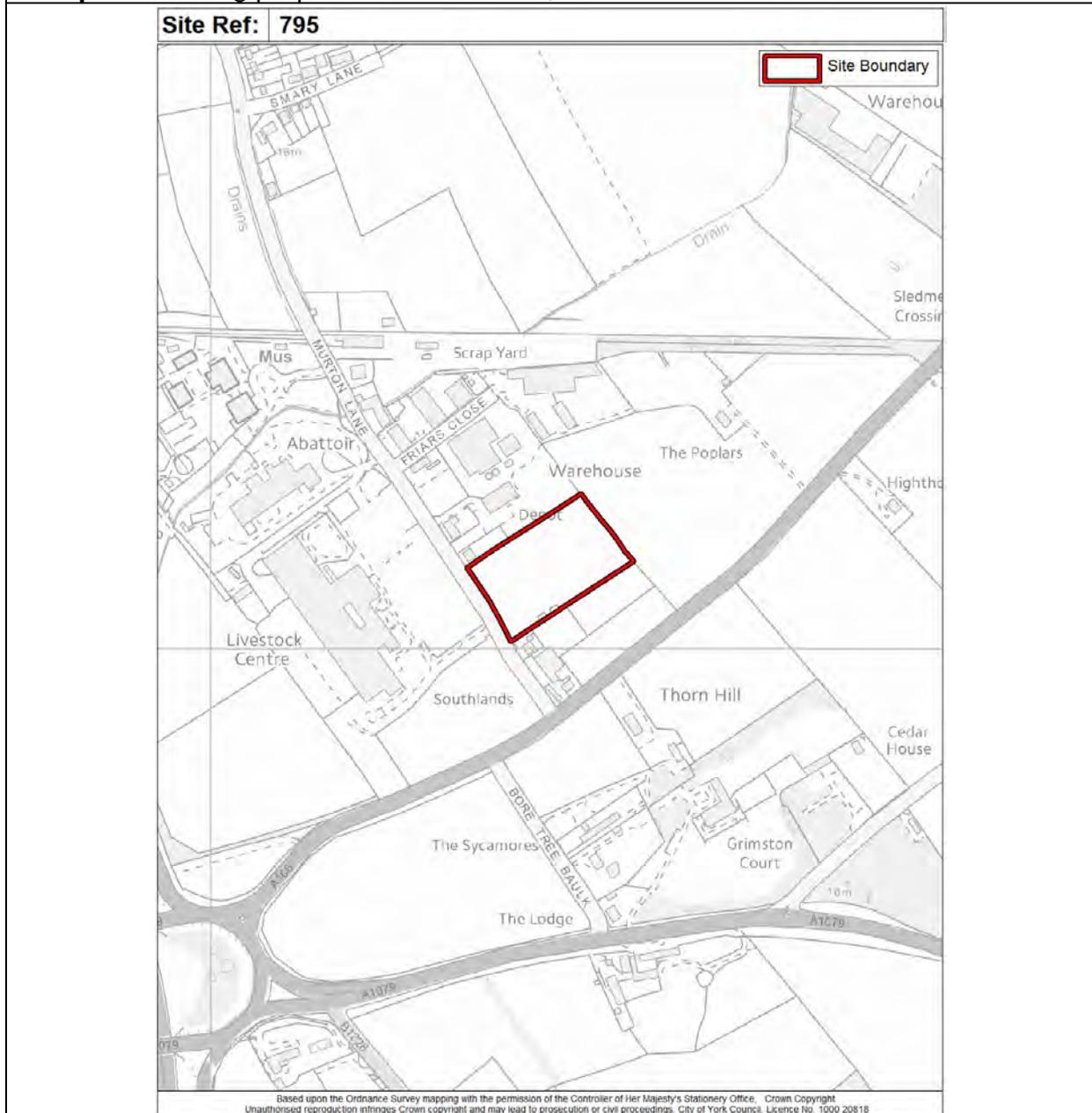
Site 795 - Greenacres

Summary

SID358 – Jennings Planning Services OBO Private Landowner - Site 795

Greenacres Should be allocated for employment purposes. Landscape reasons were given as the reason for previously rejecting the site. Landscape and transport assessments were submitted in 2016 which concluded tha the site was suitable.

Site plan showing proposed modifications, where relevant



Site 861 and Site 862 – Land at The Retreat Heslington Road

Summary

SID603 – Carter Jonas OBO The Retreat Living Ltd - We suggest that SHLAA Site Refs. 861 and 862 should be allocated for housing. This could be achieved in a sensitive manner in respect of heritage assets (please see below) and potentially contribute an estimated 250 dwellings to supply on what is previously developed land within the urban part of York. This would assist The Retreat in providing a new hospital replacing the current underused and obsolete facilities.

Site plan showing proposed modifications, where relevant

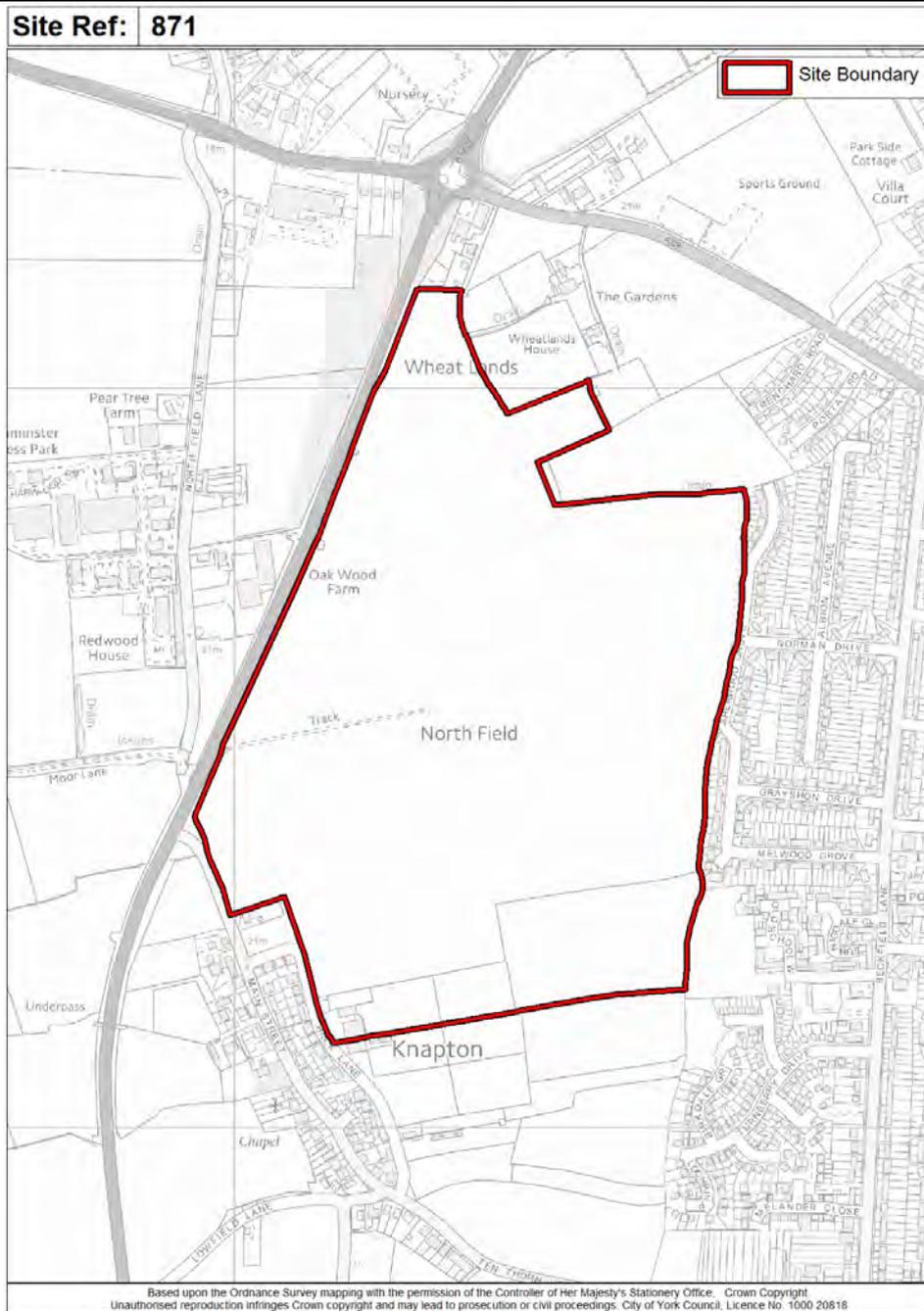


Site 871 - Land at North Field South of A59

Summary

SID604 – Carter Jonas OBO Gallagher Estates - Proposed land at North Field, York for allocation for housing. The land is Site Reference 871 within the Strategic Housing Land Availability Assessment (SHLAA). Extensive supporting information provided.

Site plan showing proposed modifications, where relevant



Site 873 - Land East of The Designer Outlet

Summary

SID141 – How Planning OBO Oakgate and Caddick groups - The site should be allocated as an employment site for B1a office floorspace. There is a strong economic case for a new business park at Naburn, providing easy access to the ring road and university, choice in the market and noting its proximity to ST15. Transport constraints could be addressed and traffic impacts mitigated. The site is in single ownership and capable of development in the short term. Technical issues previously raised by Officers have been addressed with further work currently being undertaken by Oakgate/Caddick Groups. The site is suitable to accommodate a business park (with appropriate mitigation measures).

Site plan



Site 882 Land to the East and West of Askham Lane

Summary

SID598 – DPP Planning OBO Linden Homes Strategic Land - Site 882 - Askham Lane, Acomb and Land south of Foxwood Lane, Askham should be allocated in the plan for housing. The site can contribute to meeting the city's housing need and make the plan sound without doing harm (further detail provided in rep).

Site plan showing proposed modifications, where relevant



Site 885 – Minster Equine Veterinary Clinic

Summary

SID68 – SBO Lands Ltd - #4 Northfield Lane (Minster Vets) - Remove from the Green Belt and allocate for housing or for employment or as safeguarded land.

Site plan showing proposed modifications, where relevant



Site 897 - Land Adjacent to Landing Lane Haxby

Summary

SID214 – O'Neill Associates OBO Private Landowners - The site West of Landing Lane should be allocated to address the shortfall in housing supply - Alternatively, or in combination with a housing scheme, the site west of Landing Lane could also accommodate a care home and retirement village complex to meet the immediate and pressing need for elderly person accommodation in the city.

Site plan showing proposed modifications, where relevant

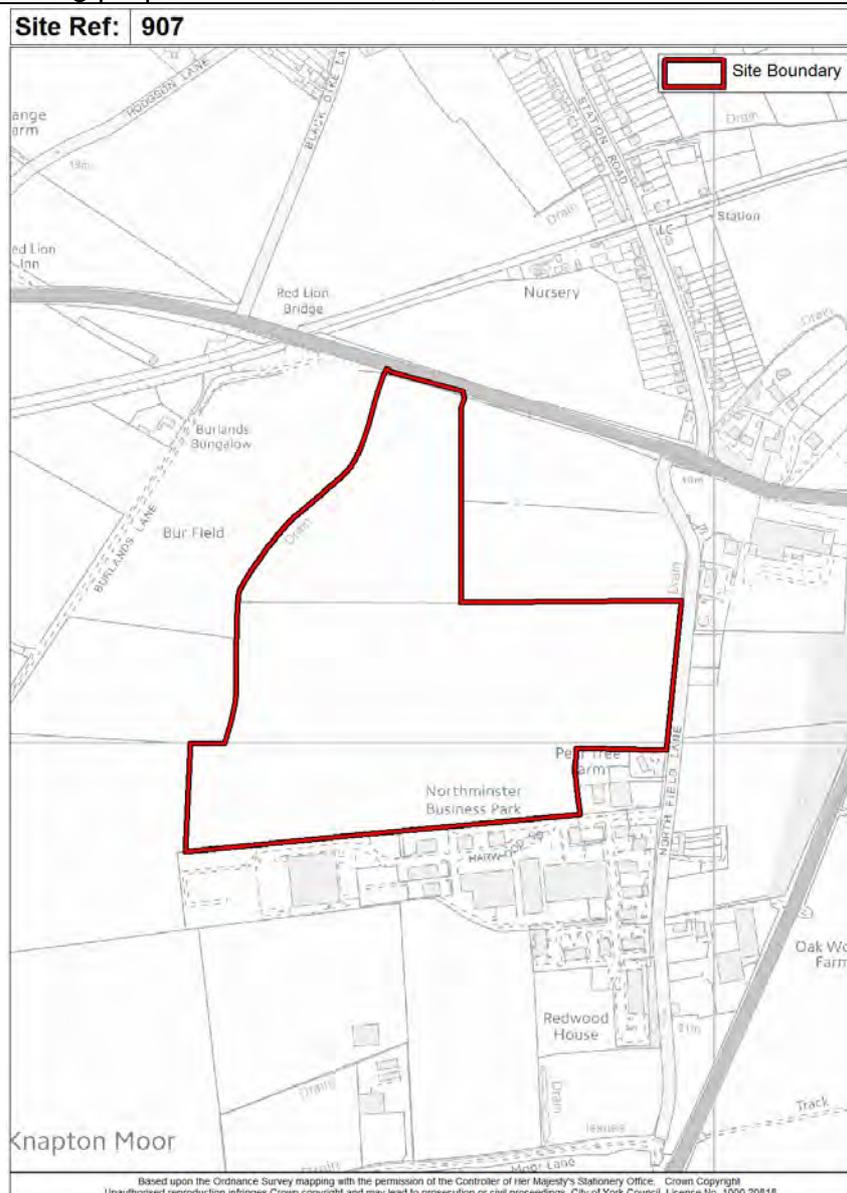


Site 907 - Land North of Northminster Business Park, Poppleton

Summary

SID354 – Vernon & Co - Given that the land to the south of Poppleton Park & Ride is now allocated as 'White Land' (without any designation) in the Neighbourhood Plan, the land should properly be considered as a housing allocation. The site could be considered for employment or mixed use purposes, but given the proposed employment allocation to the south of the Northminster Business Park, and proximity to the Poppleton Bar Park and Ride, its most appropriate predominant use is residential.

Site plan showing proposed modifications, where relevant

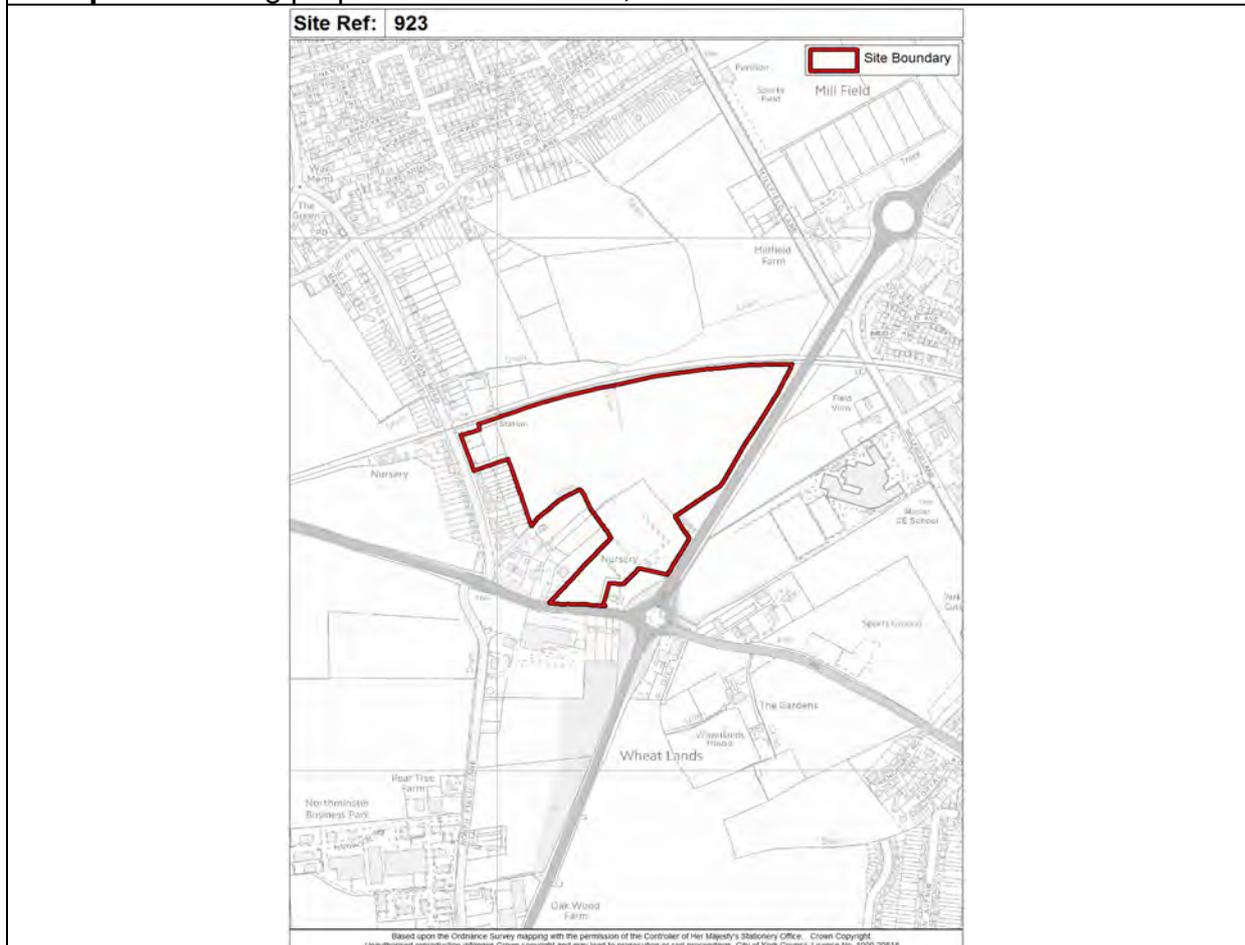


Site 923 - Land East of Station Road South of Railway Poppleton

Summary

SID848 – Mark Johnson Johnson Mowatt OBO Avant Homes - Avant Homes wish to promote the land to the North of the A59 and west of the A1237, East of Station Road Poppleton as a housing site to be included within the local plan. The site is estimated at circa 200 homes (30% affordable), with significant openspace and a new car park to serve poppleton railway station. The car park could relieve current pressures as well as create extra capacity in line with increased train frequencies upon electrification of the line, it could also open up the adjacent former coal yard for retail or community uses as the station expands. The development could also provide an upgrade to the level crossing which network rail are currently unable to fund. Planting schemes are proposed to protect areas of greenbelt and maintain open aspects of Poppleton, these areas are also proposed to contain SuDs. An indicative framework for the site is shown in appendix 1

Site plan showing proposed modifications, where relevant

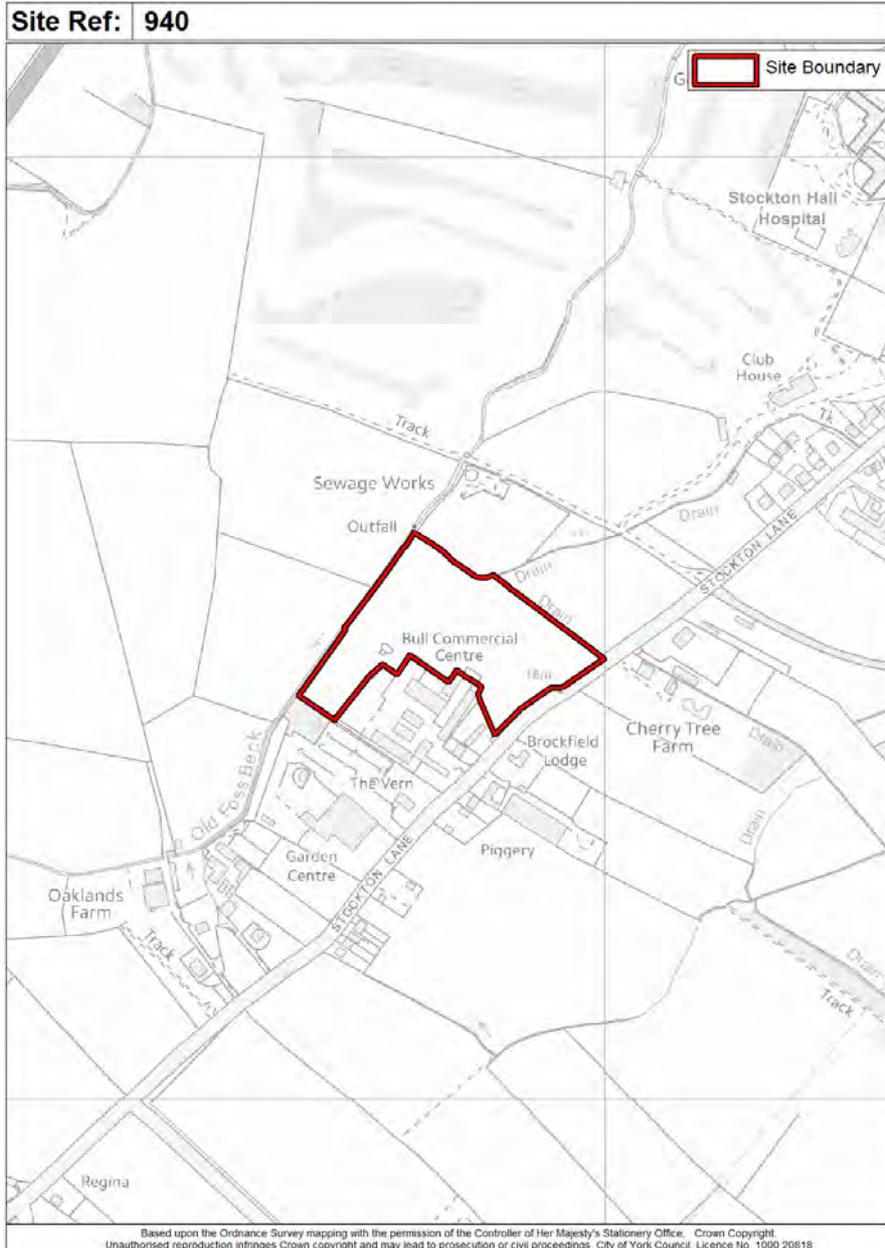


Site 940 - Land Adjacent to The Bull Commercial Centre, Stockton Lane

Summary

SID228 – The Bull Commercial Centre - In order to make the plan more sound use the land adjacent to The Bull Commercial Centre, Stockton Lane, as smaller light-industrial space.

Site plan showing proposed modifications, where relevant



Site 942 - Chaplefields PSC Submission

Summary

SID182 – Johnson Mowatt OBO KCS Developments - Land West of Chaplefields should be allocated for housing for 89 dwellings.

Site plan showing proposed modifications, where relevant



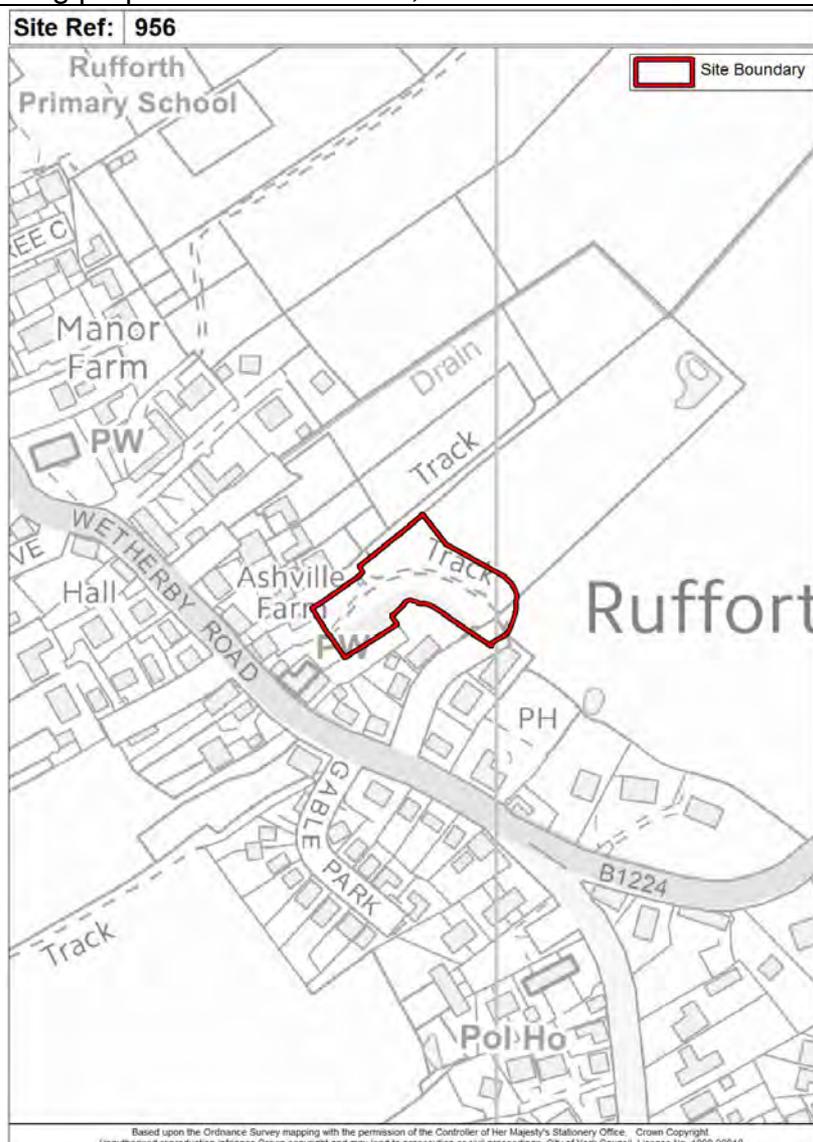
Site 956 - Milestone Avenue Rufforth

Summary

SID254 – Barton Willmore OBO Equibase Ltd - Site at Milestone Ave has substantial local support which has been demonstrated through the proposed allocation of the land in the proposed Rufforth with Knapton Neighbourhood Plan.

Indeed, it is considered that the Council's failure to allocate our Clients land is in direct conflict with the requirements of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG), which place great weight in enabling local communities to plan positively for growth in their areas through Neighbourhood Planning. Alt site 956.

Site plan showing proposed modifications, where relevant

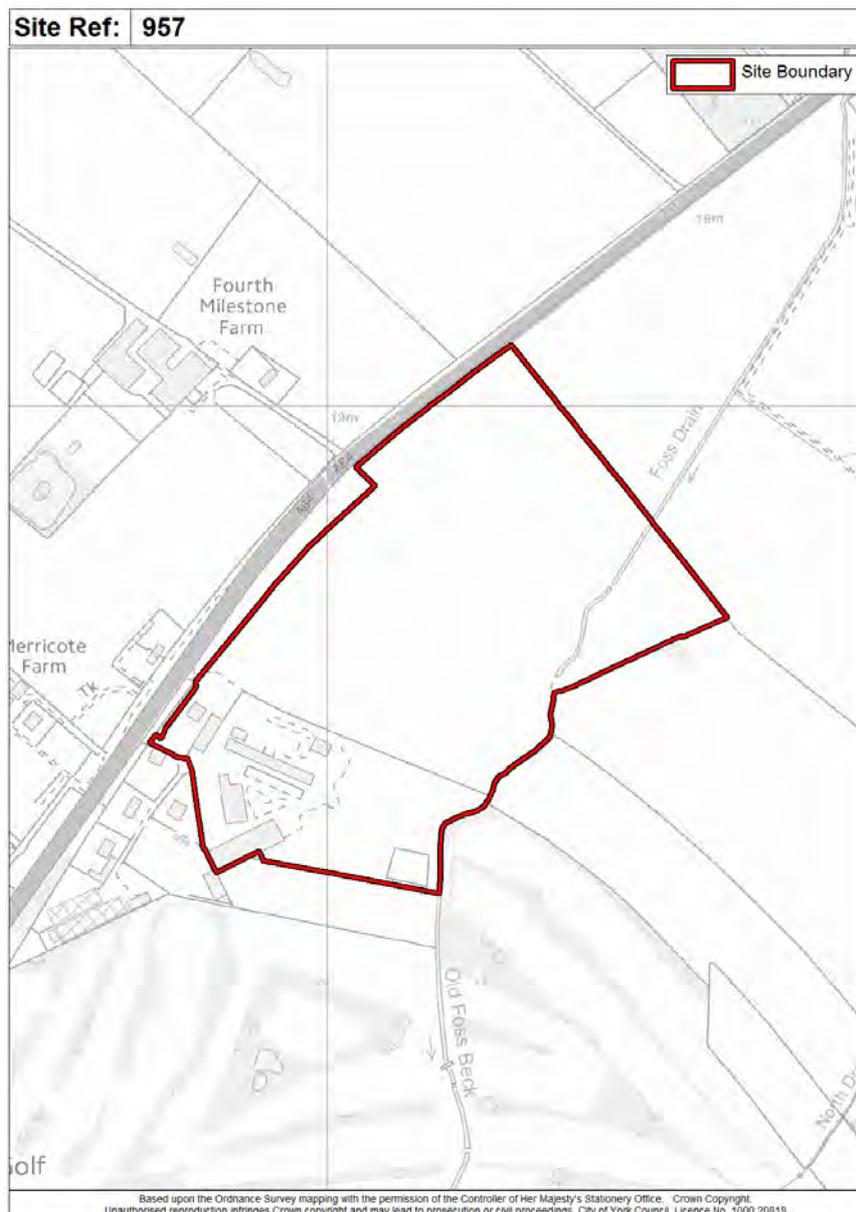


Site 957 - Malton Road Business Park

Summary

SID589 – O'Neill Associates OBO Malton Road Developments - Malton Road Business Park and land to north east - The site outlined red on the Plan at Appendix A should be identified on the Local Plan Proposals Map as an employment allocation; The 14.66 hectares at the Malton Road Business Park should be included as an employment allocation.

Site plan showing proposed modifications, where relevant

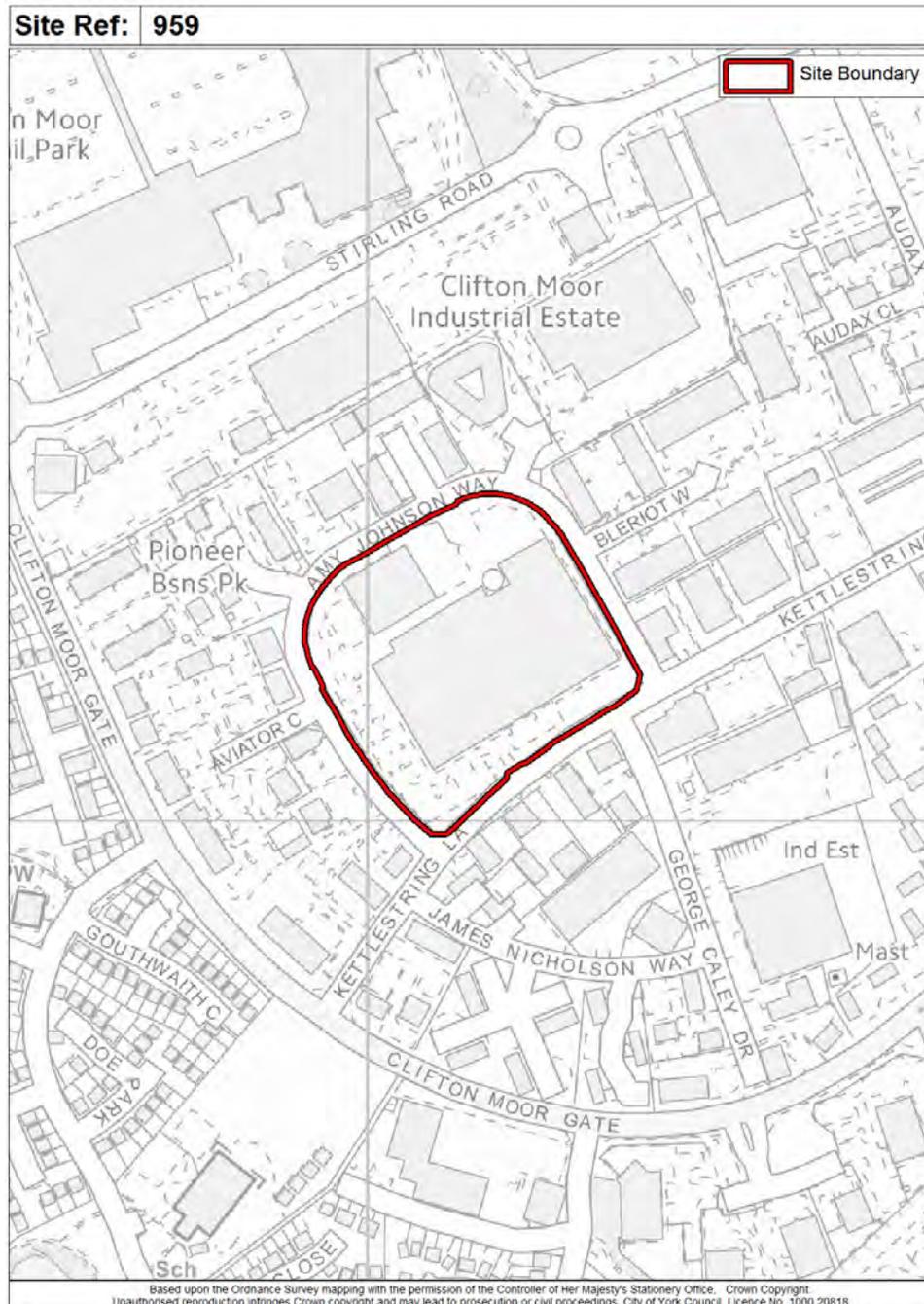


Site 959 Land at Kettlestring Lane, Clifton

Summary

SID350 – Carter Jonas OBO Picton Capital - Land at Kettlestring Lane, Clifton, SHLAA ref. 959 should be designated as a housing allocation.

Site plan showing proposed modifications, where relevant



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Site 960 - Land North of Harewood Close, Windsor Drive, Wigginton

Summary

SID586 – Savills OBO Private Landowners - Land North of Harewood Close, Windsor Drive, Wigginton (previously submitted at pre-publication stage). The site is well related to the village of Wigginton and could be developed to fully integrate into the existing urban edge, much like land allocated to the north of Haxby (ST9). The site can be designed to ensure any development does not allow further encroachment into the Green Belt and is an achievable and deliverable site that can contribute to the much needed additional housing for York, as identified within the Government's recent Consultation Paper.

Site plan showing proposed modifications, where relevant



Site 961 - Low Well Farm Wheldrake

Summary

SID203 – Savills OBO of Private Landowners- Land to the East of Wheldrake Lane, Wheldrake, York, YO19 6NA: The site could be fully developed to integrate into the existing urban edge, akin to allocated site SS18, and contribute towards meeting housing requirements. (Alt site 961)

Site plan showing proposed modifications, where relevant

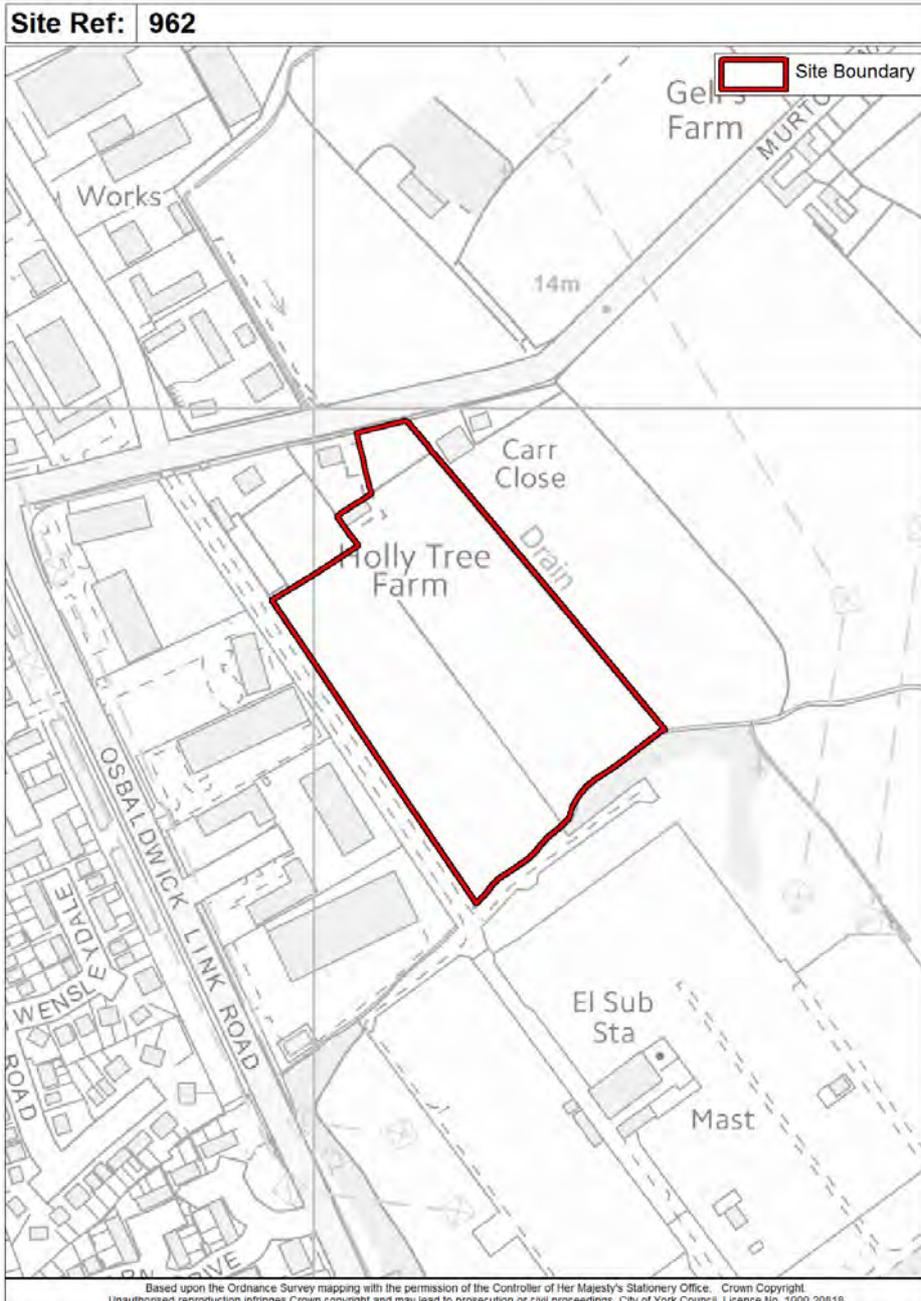


Site 962 - Brook Nook and Holly Tree Farm

Summary

SID317 – Private landowner- Land to the Rear of Brook Nook & Adjoining Holly Tree Farm, Murton Way, Osbaldwick, York, YO19 5UN. Indicative plan attached for Social/Affordable housing proposal. Freehold owners of properties would like to offer land for the plan.

Site plan showing proposed modifications, where relevant



Site 963 - Brook Nook

Summary

SID317 – Private landowner- Land at Brook Nook, Murton Way, Osbaldwick, York:
Site should have site visit. Preferable uses: Social/Affordable Housing, Care Home/Respite or Commercial Units.

Site plan showing proposed modifications, where relevant



Site 964 - Land at Galtres Farm – and alternative/extension Site 999 Galtres Farm North Land, Huntington, York

Summary

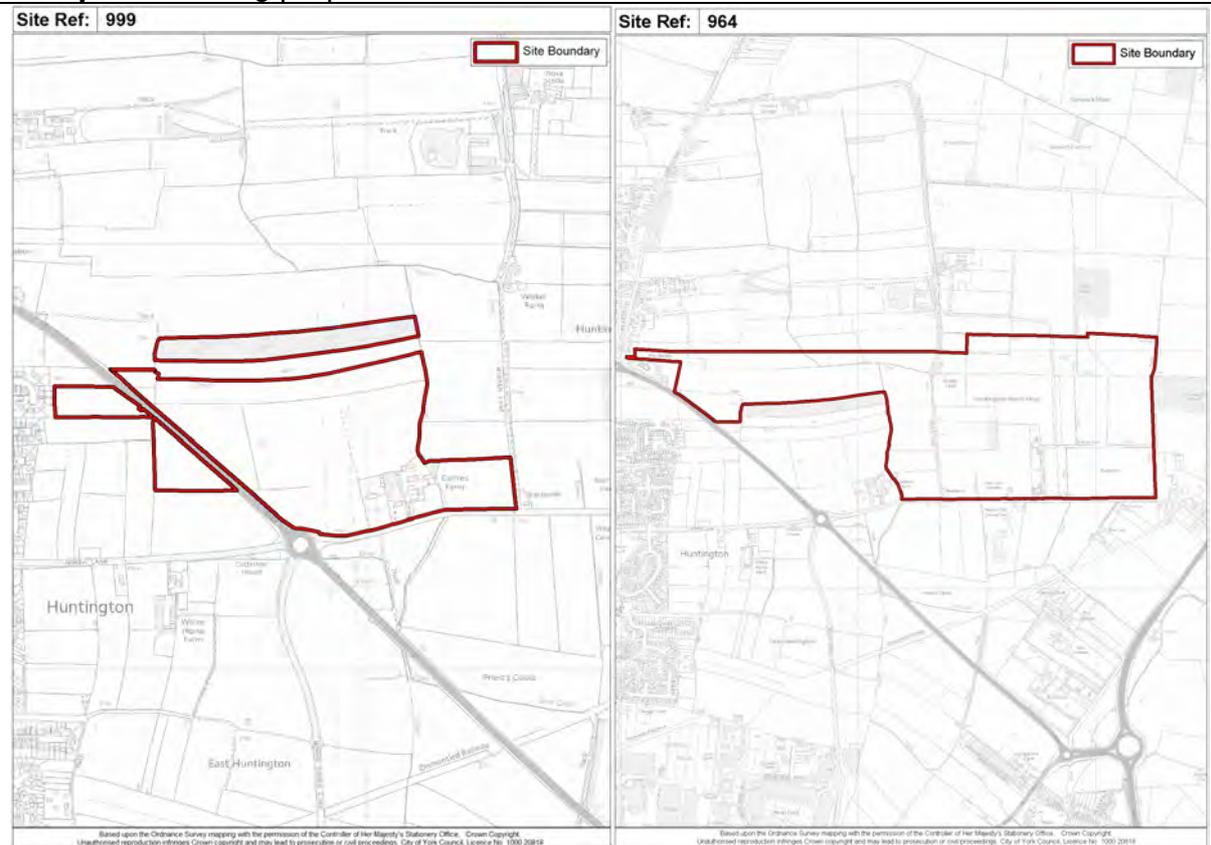
SID376 ELG Town Planning OBO Taylor Wimpey - Taylor Wimpey UK Ltd proposes the release the land at Galtres Farm shown in Figure 1 (Site 999) from the Green Belt for residential development. The site has been promoted previously and was considered in the 2017 SHLAA (sites 891 & 922) alongside land to the north and east but was not taken forward. The boundaries of the 'Galtres Garden Village' (Site 964) should be refined to include the remainder of the land at Galtres Farm (Site 999) which extends to approximately 27 hectares and could accommodate

a significant amount of new homes as well as providing significant open space and increasing the size and usability of the proposed country park to the north. This would be beneficial in providing a larger the Garden Village the more, services and would enable access from the A1237.

SID620 – O'Neill Associates OBO Galtres Garden village Development

Company - Land north east of Huntington (Galtres Garden Village - ref 964) should be allocated as a new settlement. The site will accommodate 1,753 residential units which includes a 64-person care home on 77.37 hectares of land with an additional 15.6ha provided as a country park. The representation contains extensive supporting information relating to: Green Belt, Highway Impact and Access, Landscape, Ecology, Archaeology, Heritage, Flood Risk and Drainage as well as Sustainability Appraisal, Viability and Deliverability.

Site plan showing proposed modifications, where relevant



Site 965 - Land South of Rufforth Airfield

Summary

SID205 – Savills OBO of Private Landowner- Land to the South of Southfield Close, Rufforth, York: This site could be included for residential purposes rather than the proposed green belt and should be considered to meet housing requirements. The site has no technical constraints and is advantageously located with excellent transport routes. There is no reason to justify sites inclusion within the new boundaries of the York Green Belt. The site is available immediately for development and can come forward in the period of 0-5 years. (Alt site 965).

Site plan showing proposed modifications, where relevant



Site 968 (Formerly site 191) Land North of Avon Drive York

Summary

SID826 – Thomas Pilcher Homes – The site known as Huntington North (Site 191) should be included in the revised draft Local Plan sites because it complies with criteria 1,2,3 & 4 and the technical officer assessment for transport, geo-environmental, historic environment, landscape and design. It is a superior site to other allocations.

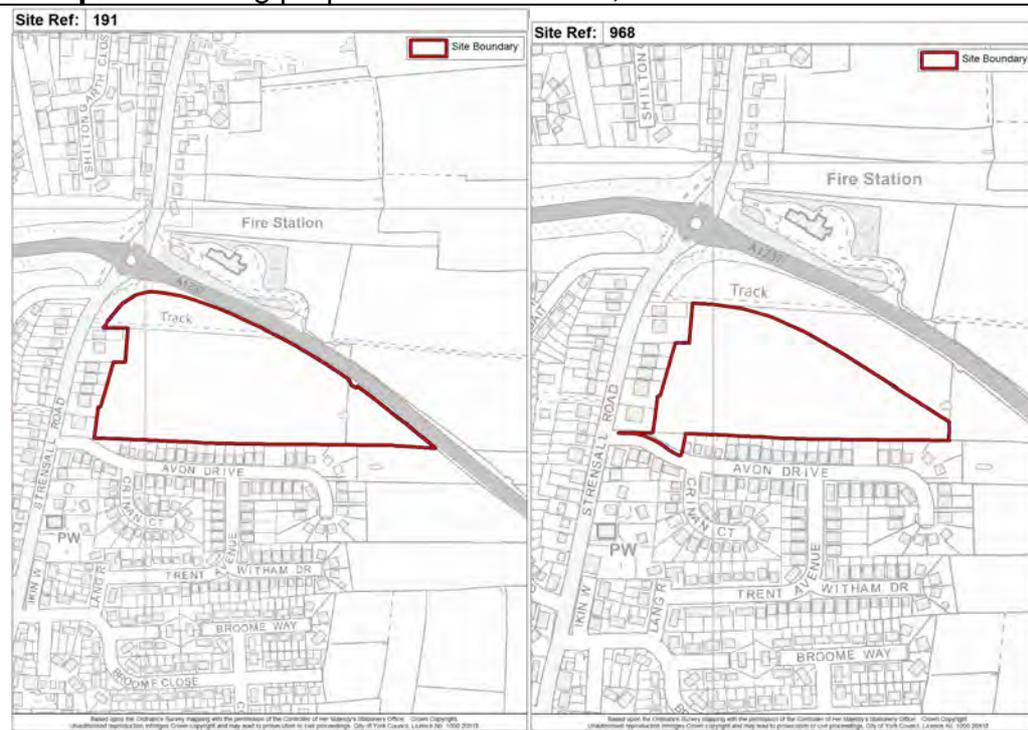
SID827 – Pilcher Homes Ltd - Planning applications on the Huntington North Site (Ref ??) have been refused solely on the grounds of greenbelt.

Site 191 Huntington north should be removed from the greenbelt as the secretary of state wrote (APP/C2741/W16/3149489) that the proposed development would not harm the landscape character and setting of York and that it could deliver a more successful urban edge than that which currently exists and screen existing and future housing in a relatively short timeframe.

Previously rejected site 191 Land North of Avon drive should be allocated in preference to sites ST7, ST8, ST9, ST14, ST15 and ST31 on the basis of agricultural land value. as 25 % of site 191 is inaccessible and fenced off to protect a water pipe line and 75% is rented by a tenant farmer for set aside the land not being worth the efforts for grazing or arable farming in contrast with accepted higher value on other sites. Ecological surveys have been submitted alongside previous refused planning applications.

The site complies with site selection criteria 1,2,3,4 and technical officer assessments. The technical officer assessment that land at the site is required for duelling and grade separation of the ring road/roundabout affecting the viability of the site is not true and plans of the land actually required have been submitted.

Site plan showing proposed modifications, where relevant



Site 969 - Land East of Northfield Lane South of Wyevale

Summary

SID68 – SBO Lands Ltd – #2 Northfield Lane (south of garden centre) should be removed from the proposed Green Belt and allocated for employment or as safeguarded land.

#3 Northfield Lane (south of garden centre) - It is anticipated that the consultation process for the Draft Local Plan will establish that a number of sites allocated for housing are not viable or deliverable within the plan period. Consequently, alternative sites will need to be allocated by the Council in order to meet its housing targets for the Plan period. It is considered that the site (land east of Northfield Lane) should be brought forward for allocation to assist in meeting these housing targets.

Site plan showing proposed modifications, where relevant



Site 970 - Land at Princess Road, Strensall

Summary

SID210 – Litchfields OBO Wakeford Properties Ltd - It is considered that the site at Princess Road, Strensall represents a sustainable location for housing development which could assist the council in delivering its housing target. It is suitable, available and achievable for residential development for market and affordable dwellings and there are no insurmountable constraints to delivering housing on the site. The site is able to come forward for development in the short-term (years 1 – 5) and therefore represent a deliverable site. If the site is not identified for allocation it should be identified as Safeguarded Land

Site plan showing proposed modifications, where relevant

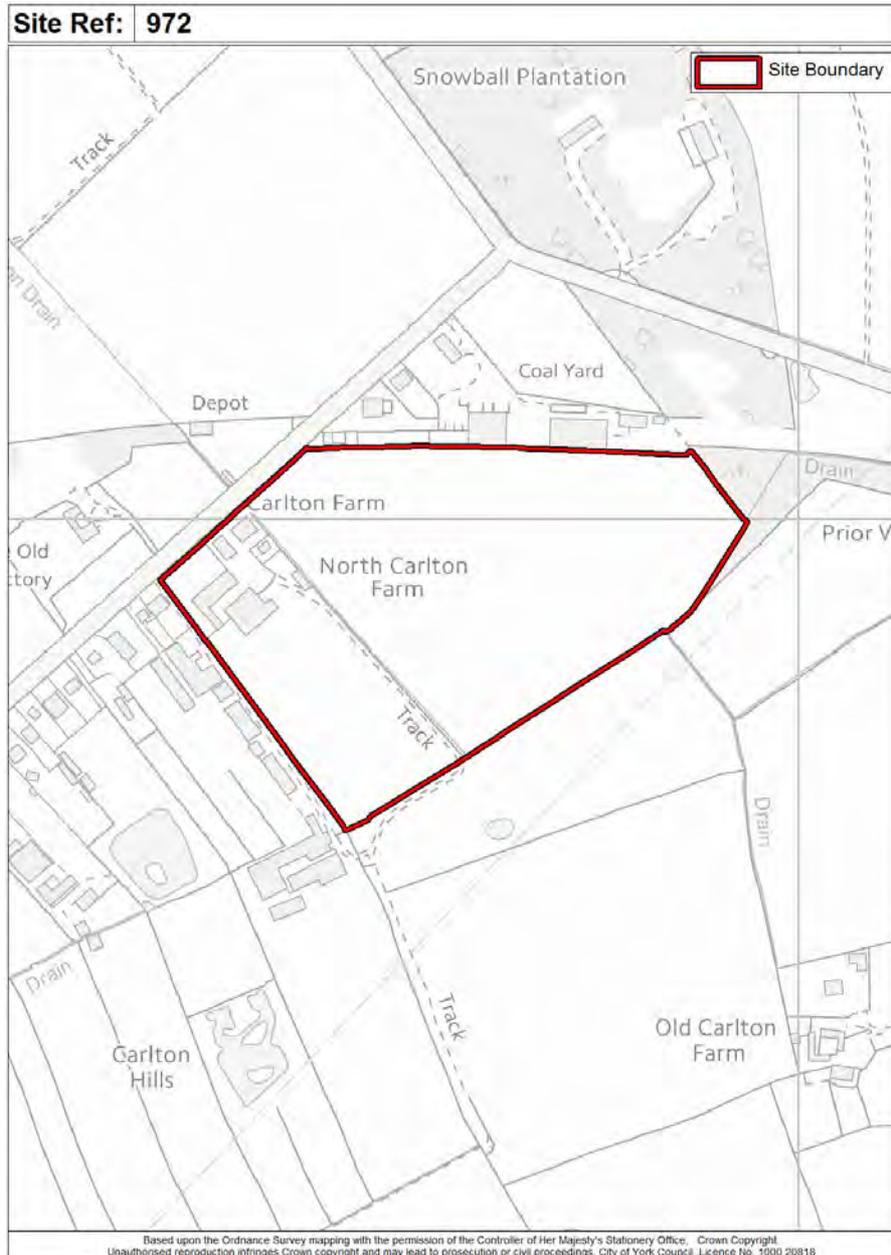


Site 972 - Land at North Carlton Farm

Summary

SID284 – Private landowners– We would like to offer the land at North Carlton Farm, Sandy Lane, Stockton on Forest, York, YO32 9UT, for housing as part of the CYC Local Plan. This comprises the Farmhouse, farm yard, buildings and adjacent fields. Fields No. 2975, 6186, 6900 and 8900.

Site plan showing proposed modifications, where relevant



Site 976 - Site to the West of H39 (Previously Part of site 789)

Summary

SID401 – Directions Planning OBO Private Landowners- Additional land needs to be allocated to ensure enough houses will be built. Consequently, sites such as 789 (extension to H39) should be removed from the Green Belt and included in the list of draft housing allocations noted in Draft Policy H1. – illustrated boundary in rep is that of Site 976 shown below

Site plan showing proposed modifications, where relevant



Site 982 - Racecourse Greenhouses Middlethorpe Village

Summary

SID122– Turnberry Consulting Ltd OBO of York Racecourse- The COYC are relying on around 169 dwellings each year to be delivered through windfall development sites. The Racecourse is constantly reviewing its Estate and there are two sites which could conceivably accommodate residential accommodation in order to meet the Objectively Assessed Need of the City of York through windfall development. Rep goes on to provide detail about the 'Middlethorpe Village Site' (Alt site 982)

Site plan showing proposed modifications, where relevant



New Site 990 - Peppermill Court

Summary

SID366 – Icen Projects OBO NHS Property Services - Should any part of the Peppermill Court site be declared as surplus to the operational healthcare requirements of the NHS in the future, then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5 - 10 years.

Site plan showing proposed modifications, where relevant



New Site 991 - Limetrees ,Shipton Road

Summary

SID366 – Icen Projects OBO NHS Property Services - Should any part of the Limetrees site be declared as surplus to the operational healthcare requirements of the NHS in the future, then the site should be considered suitable and available for alternative use, and considered to be deliverable within the period 5- 10 years. The site does not contribute to the purposes of the Green Belt (SS2) and hence is a candidate for release from it. Policy SS2 provides some flexibility in relation to the redevelopment potential of the previously developed site at Limetrees development of which would be considered limited infilling. The site is allocated as 'existing open space', (GI5) it is currently private land and thus access to this 'open space' is restricted and not publicly accessible.

Site plan showing proposed modifications, where relevant



New Site 992 - Cherry Tree House

Summary

SID366 – Icen Projects OBO NHS Property Services - Should any part of the Cherry Tree House site be declared as surplus to the operational healthcare requirements of the NHS in the future, then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5 - 10 years.

Site plan showing proposed modifications, where relevant



Site 993 - Land off Wetherby Road, Rufforth

Summary

SID371 – Lister Haigh OBO Private Landowners - We disagree with the draft allocations. We believe that site ref. land off Wetherby Road, Rufforth should be supported and included as a housing allocation in the Local Plan and should be modified to meet the test of soundness. Attached is a representation that was submitted to the Council in November 2017 containing further information and a site plan.

Site plan showing proposed modifications, where relevant

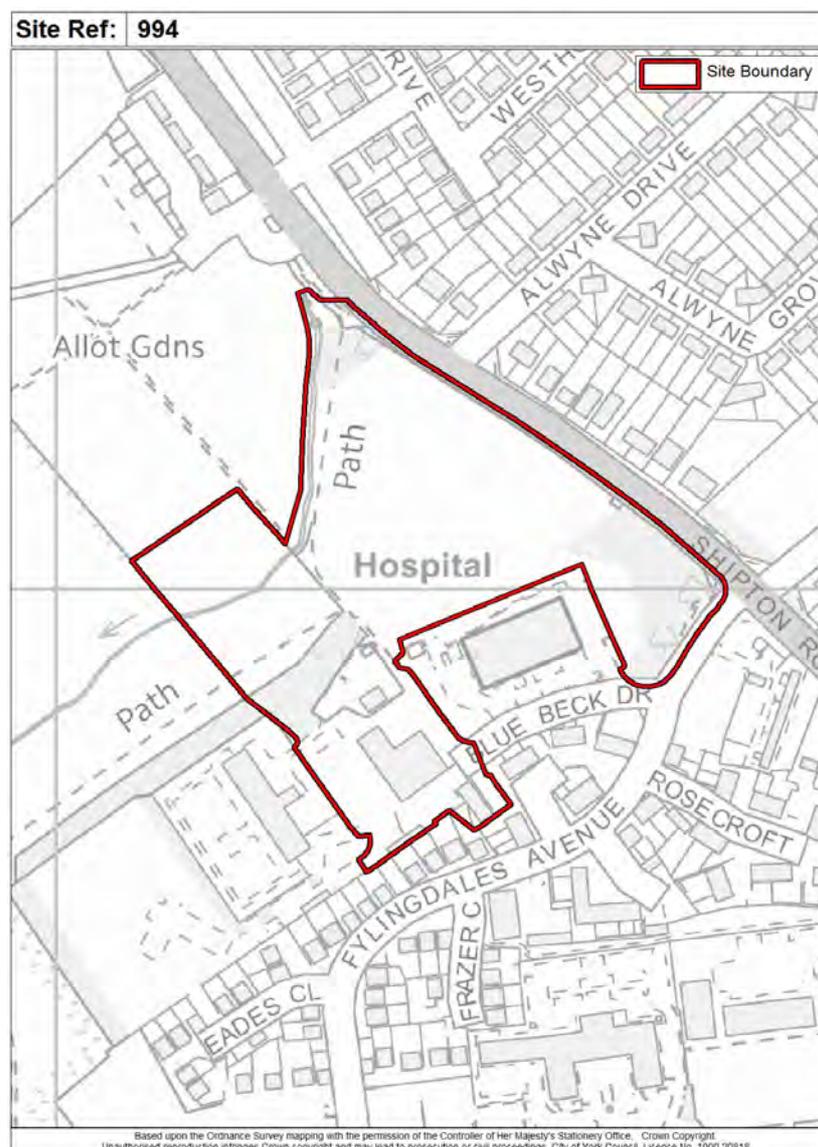


New Site 994 - Clifton Park Hospital Site

Summary

SID359 – Litchfields OBO NHS Property Services - Clifton Park Hospital Site could accommodate a mixed used scheme across two phases that could meet the identified need for additional housing sites in York. Various development options available within 3.6ha site. See accompanying representation titled 'York Local Plan Publication Draft Consultation – Representation on behalf of NHS Property Services Ltd: Clifton Park Hospital' (ref: 50794/MHE/AJk/15677426v2)

Site plan showing proposed modifications, where relevant



Site 996 — Land New Farm Park Field, Skelton

Summary

SID608 – Lister haigh OBO Private Landowners - Land at Park Farm, Skelton should be allocated as mixed use (housing and employment)

Site plan showing proposed modifications, where relevant



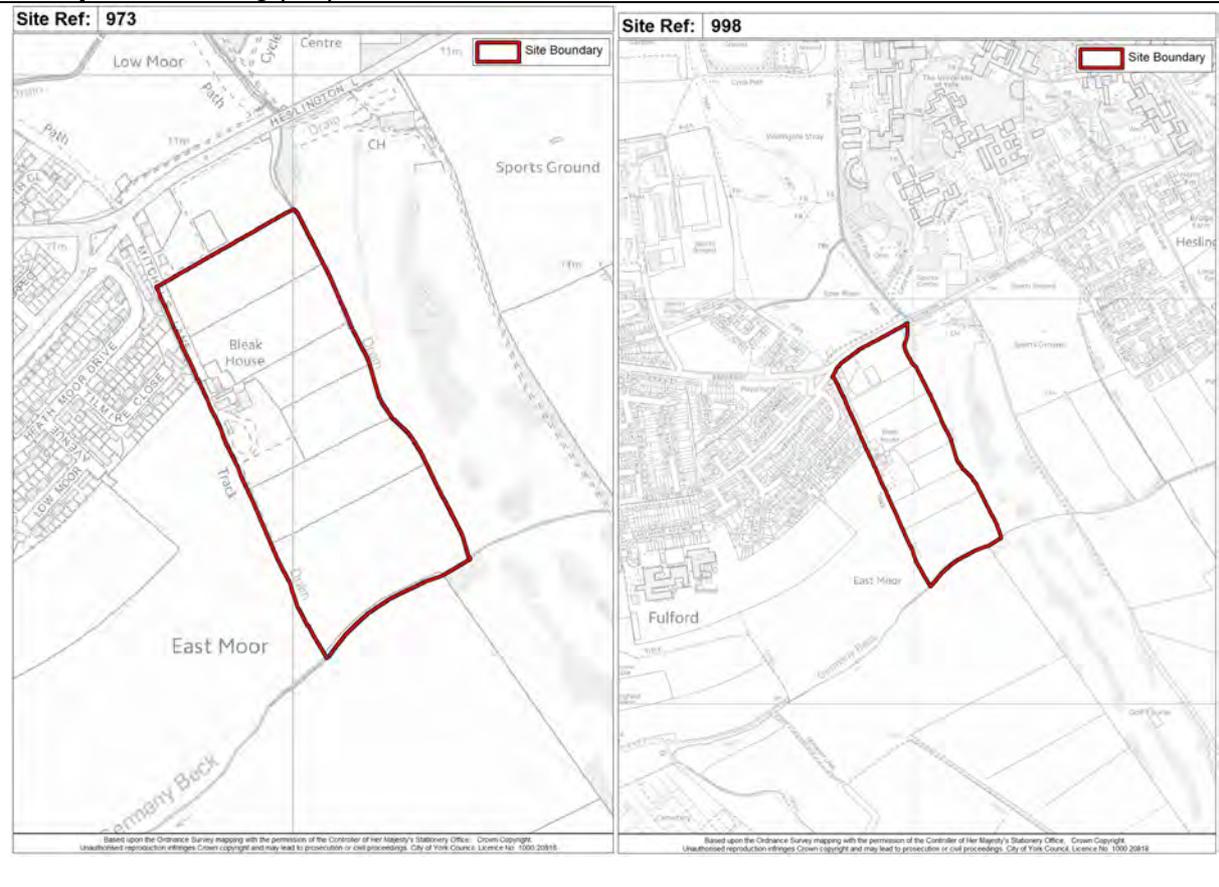
Site 998 – Extended Land off Mitchell’s Lane, Fulford (Previously considered under Site 973 and Site 134)

Summary

SID212 – IB Planning OBO Nixon Homes - Remove the site (site at Mitchell's Lane Fulford) from the green belt and include it within Policy H1 of the Plan as a housing allocation. – Site 998 (Previously considered under refs 973 and 134)

SID357 – ID Plannign OBO Green Developments - The Fulford site along with land to the north extending towards Heslington Lane would comprise a sustainable urban extension to this part of York with land to the west comprising white land within the settlement limits and therefore the sites would comprise a natural extension to the settlement. – Site 973

Site plan showing proposed modifications, where relevant



Annexes

Annex 1 – City of York Local Plan Sustainability Appraisal Appendix K– Policy and Site Audit Trail (February 2018)

Annex 2 – Council Executive Report (13th July 2017) including Annex's 3-5 and 7 and associated minutes

Annex 3 – Council Executive Report (25th January 2018) including Annex A and the associated minutes.

Annex 4 – LDF Issues and Options Consultation Summer 2006 (July 2007)

Annex 5 – Core Strategy Consultation Statement (July 2009)

Annex 6 – Core Strategy Preferred Options Consultation Statement & Schedule of Responses (February 2011)

Annex 7 – Core Strategy Submission (Publication) Consultation Statement Regulation 30 (1) (d) Statement (September 2011/amended 2012)

Annex 8 – Core Strategy Consultation Statement Regulation 30 (1) (e) (January 2012)

Annex 9 – City of York Local Plan Preferred Options – Consultation Audit Trail (May 2013)

Annex 10 – City of York Local Plan Preferred Options Consultation Statement (2018)

Annex 11 – City of York Local Plan Further Sites Consultation Statement (2018) –

Annex 12 – City of York Local Plan Preferred Sites Consultation Statement (September 2017)

Annex 13 - City of York Local Plan Pre-Publication Consultation Statement (February 2018)

Publication Draft Consultation Annexes

Annex 14 – List of Specific Consultees

Annex 15 – Consultation Letter

Annex 16 – City Wide Leaflet

Annex 17 – Media Releases and examples

Annex 18 – Comments Form

Annex 19 – Poster

Annex 20 – Statement of Representation Procedure

Annex 21 – Index of Respondents

Annex 22 – Schedule of Representations in Policy Order