

From: Kathryn McCain [REDACTED]
Sent: 17 March 2023 16:49
To: localplan@york.gov.uk
Subject: RE: Representations to City of York Council Consultation of Main Modifications to the draft City of York Local Plan
Attachments: Caravan Club - York - City of York Council FNL.pdf
Follow Up Flag: Follow up
Flag Status: Completed

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Dear Planning

I am emailing in response to the Consultation on the Main Modifications to the draft City of York Local Plan. On behalf of our client, the Caravan and Motorhome Club, we prepared and submitted that attached letter in response to the consultation on main modifications to the local plan.

If you have any queries, please do let me know.

Kind Regards

Kathryn McCain

BA (Hons)

Senior Planner

Planning

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Forward Planning Team
City of York Council
West Offices
Station Rise
York
YO1 6GA

Our ref: KRM/0202116

Date: 17 March 2023

Dear Sir/Madam,

Re: Representations to City of York Council Consultation of Main Modifications to the draft City of York Local Plan

This letter contains our representations on behalf of the Caravan and Motorhome Club (the 'Club') submitted to the City of York Council regarding the Main Modifications Consultation to the New Local Plan. The Club has a single site within the local authority area located at York Beechwood Grange Caravan Club and Motorhome Campsite, Malton Rd, York YO32 9TH. The Club request the option of establishing Pods and Residential accommodation on site.

Site and Surrounding Area

York Beechwood Grange Caravan Club and Motorhome Campsite is located north west of the A64 on Malton Road which links to the A1237 roundabout to the south. The site is located outside of the A1237 Ring Road.

The site is located within the Green Belt in an area predominantly characterised by large fields. The Caravan Club and Motorhome site itself is largely shielded from view by the existing vegetation and trees situated on the perimeter of the site, and by the Grange, a Grade II listed former residential building that forms part of the York Beechwood Grange Caravan Club and Motorhome Campsite.

In addition to the Grange, there are two further statutory listings within close proximity to the site, including Calm Cottage (Grade II Listed) and Gate Piers (Grade II Listed).

Planning Policy

Overall, we recommend that planning policy is correctly worded as to allow for the Club, an important rural economy business to develop and improve their site, to ensure its long-term viability. Together with ensuring the site can be adapted and upgraded to meet the needs and standards of its users.

Modification MM4.8 Policy EC5 Explanation – Paragraph 4.17 seeks to provide clarity regarding Green Belt Policy (See appendix 1 for summary of Policy EC5). The proposed modification states that caravan sites are inconsistent with policy requirements to protect openness, temporarily permissions may be considered, where other criteria are met. The Club contests the proposed modification and its assertion that caravan sites are incompatible with the Green Belt and necessitate harm to its openness, as it would directly inhibit the Club's ability to expand their site in the future, restricting the Club's ability to adapt to future needs and circumstance, and prejudicing the Club's long-term viability.

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For the reasons set out above, the Club also contests the inclusion of the wording "*on a temporary or permanent basis*" to Policy EC5, proposed under Main Modification MM4.7, where Policy EC5 states that York's rural economy will be sustained and diversified by permitted camping and caravan sites for holiday and recreational use. The Club is supportive of the original wording of this policy, which would protect the Club's interests and its continued viability.

It is important to note that the important socio-economic benefits tourist accommodation plays in supporting local economies, encouraging tourism, and promoting enjoyment and education of and investment in the country's green space, including the Green Belt. To directly and intentionally restrict tourism accommodation within the Green Belt would be harmful to the wider local and rural economies of the district and directly prejudice the Club's own economic certainty. Further, the assertion that caravan sites ubiquitously cause harm to openness is unfounded and an overgeneralisation that undermines the soundness of the draft policy and thereby the draft local plan.

Proposed Modification MM10.1 seeks a complete re-write of Policy GB1: Development in the Green Belt (see appendix 1 for original wording of Policy GB1). This Policy identifies the parameters for development allowable in the Green Belt. It is recognised that the modifications to this policy fundamentally constitute an extract of Green Belt policy from the National Planning Policy Framework. However, the Club is concerned that no direct reference is made of tourism accommodation as an acceptable form of development within the Green Belt, aside from inclusion that development for facilities for outdoor recreation would be acceptable.

Whilst, given the nature of the Club's facilities, including those at the York Beechwood Grange Caravan Club and Motorhome Campsite, which allow a more direct enjoyment of the natural amenities than other forms of tourist accommodation, it is considered that the campsite and motorhome would constitute a facility for promoting and facilitating outdoor recreation, it is requested that specific reference is made to tourism accommodation within Policy GB1. In light of the proposed modification MM4.8 identified above, which specifically states caravan sites as inappropriate in the Green Belt, it is understood that this interpretation unlikely to be the intention of this policy, or the Council's interpretation of it.

We request that a specific reference is made to the inclusion of extensions and developments associated with existing sites offering tourist accommodation within draft Policy GB1, providing it does not harm the openness or landscape character of the Green Belt. This should include allowance for the upgrading of existing tourism sites, including the provision of pods, glamping and residential units for holiday lets. Such allowances would provide comfort to the Club, and ensure its continued long term economic viability. It is worth emphasising again the important role tourism and tourist accommodation plays in local and rural economies and encourages active engagement with and enjoyment of the natural environment.

On a broader note, is it considered that greater emphasis should be placed on the importance of tourist accommodation, including Caravan Sites and Camping Sites, on the local economy. Flexibility should be applied to make provision for the upgrading of existing camping and caravan sites. Ideally this would include, making specific reference to the provision and adaptation of pods, lodges, glamping and ancillary buildings, including provision and expansion of permanent caravan storage, and residential units for holiday lets. Overall, this ensures the future viability of the Club, and supports the tourism industry within York City Council.

Conclusion

As noted above, the presence of the York Beechwood Grange Caravan Club and Motorhome Campsite provides economic benefits for the wider area by bringing visitors to the local region. Therefore, the protection and enhancement of important tourist locations such as this campsite will contribute to ensuring the continued economic health and success of the site and local rural economies.

It is The Club's primary desire to ensure that policies are included in the draft Local Plan that support and encourage tourism development, and its expansion. The draft policies of the York Local Plan should make direct reference to supporting tourism accommodation, including within the Green Belt.

The Club is greatly concerned by the proposed main modifications to Policies EC5 and GB1, and request that allowances are made for the provision and expansion of tourist accommodation sites, including ancillary uses and extensions, alongside the allowances for the provision of residential units for holiday lets.

It would be beneficial for emerging policy to make provision for the upgrading of existing camping and caravan sites. Ideally making specific reference to the provision and adaptation of pods, lodges, glamping and ancillary buildings, including provision and expansion of permanent caravan storage, and residential units for holiday lets. Overall, this ensures the future viability of the Club, and supports the tourism industry within York.

Yours faithfully,

Kathryn Rose McCain

Kathryn Rose McCain (Mar 17, 2023 16:41 GMT)

Kathryn McCain
BA (Hons)
Senior Planner



Policy EC5 (Rural Economy)

In addition to the allocation in villages in Policy EC1, York's rural economy will be sustained and diversified through:

- supporting appropriate farm and rural diversification activity including office and leisure development (Use Classes B and D);
- permitting camping and caravan sites for holiday and recreational use where proposals can be satisfactorily integrated into the landscape without detriment to its character, are in a location accessible to local facilities and within walking distance of public transport to York, and would not generate significant volumes of traffic; and
- attaching a seasonal occupancy condition to permissions for visitor accommodation where it is not suitable for year-round occupation by nature of its location, design or proximity to a habitat that needs extra protection at certain times of the year

Policy GB1 (Green Belt)

Within the Green Belt, planning permission for development will only be granted where:

- i. the scale, location and design of development would not detract from the openness of the Green Belt;
- ii. it would not conflict with the purposes of including land within the Green Belt; and
- iii. it would not prejudice or harm those elements which contribute to the special character and setting of York.

AND

it is for one of the following purposes:

- agriculture and forestry; or • appropriate facilities for outdoor sport and outdoor recreation; or
- cemeteries; or
- limited infilling in existing settlements; or
- limited extension, alteration or replacement of existing buildings; or • limited affordable housing for proven local needs; or
- development of existing developed sites where this would lead to an overall improvement in the character and appearance of the Green Belt without compromising openness; or
- minerals extraction, provided high environmental standards are attainable; or
- essential engineering operations including waste disposal; or
- local transport infrastructure including highways work and Park & Ride facilities; or
- the reuse of buildings; or
- development brought forward under a Community Right to Build Order; or

- renewable energy schemes, where it can be proved that the location is necessary for technical reasons and wider environmental benefits can be demonstrated. All other forms of development within the Green Belt are considered inappropriate. Very special circumstances will be required to justify instances where this presumption against development should not apply.

From: Kathryn McCain [REDACTED]
Sent: 27 March 2023 10:03
To: localplan@york.gov.uk
Subject: RE: Representations to City of York Council Consultation of Main Modifications to the draft City of York Local Plan
Attachments: CYC Local Plan Mods Consultation 23 - PDF Form (2).pdf

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Dear Planning
Apologies for the delay in my response, I was on annual leave.
I have completed the attached survey as requested.
Do let me know if you require anything further.

Kind Regards,
Kathryn McCain
BA (Hons)
Senior Planner
Planning

IMPORTANT: From 1st April 2023 Energy Performance Certificate (EPC) legislation changes significantly for non-domestic properties. Follow [this link](#) for more information

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From: [REDACTED]
Sent: 20 March 2023 15:41
To: Kathryn McCain [REDACTED]
Subject: RE: Representations to City of York Council Consultation of Main Modifications to the draft City of York Local Plan

Hi Kathryn

I can confirm that we have received your response.
However, please could I request that you complete the attached survey form and return to us. The survey form mirrors our [online form](#) and asks specific questions in relation to our privacy notice, amongst other things, that we need to receive to appropriately process the response. For clarity, please could you also indicate using this form, or through updating your response previously attached, to reference

which modifications/ evidence base you are specifically referring to for the avoidance of doubt.

Regards

Alison

Alison Cooke | Head of Strategic Planning Policy (she/her)

e: [REDACTED]

City of York Council | Strategic Planning Policy

Directorate of Place|West Offices |Station Rise |York YO1 6GA

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Working Days: Monday, Tuesday and Thursday

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Sent: 17 March 2023 16:49

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Dear Planning

I am emailing in response to the Consultation on the Main Modifications to the draft City of York Local Plan.

On behalf of our client, the Caravan and Motorhome Club, we prepared and submitted that attached letter in response to the consultation on main modifications to the local plan.

If you have any queries, please do let me know.

Kind Regards

Kathryn McCain

BA (Hons)

Senior Planner

Planning

[REDACTED]

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1. Survey Information

Comments made during this consultation should relate to the proposed Main Modifications, Policy Map changes, associated Sustainability Assessment (SA) or Habitat Regulation Assessment (HRA) Addenda and new evidence documents. All representations made will be taken into account by the Inspectors in examining the Plan. Comments should relate to the Plan's legal and procedural compliance and the soundness of the modifications. The tests of soundness are set out in the [National Planning Policy Framework](#).

Please read our [guidance note](#) for more information on taking part.

Our survey asks for some personal information which you may choose not to give. We do not publish or share any information which can identify you. Please read our [privacy notice](#) to find out more about how we protect your personal information. We will ask for your consent to this at the start of the survey.

You can withdraw your consent at any time by contacting localplan@york.gov.uk.

* 1. Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes No

2. Register for consultation

* 2. Your name:

Kathryn McCain

* 3. Contact details:

Please provide email and/or address

Organisation (optional)

Rapleys LLP

Address

66 St James's Street

Address 2

City/town

London

Post code

SWA 1NE

Email address

* 4. Do you wish to be notified when the City of York Local Plan is adopted by the Council?

If yes we will use contact details provided above

Yes No

3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

4. Proposed Main Modifications

* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

5. Section 2: Vision

* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management

6. Section 3: Spatial Strategy

*** 8. To which modification does this response relate?**

- | | |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.3 Key Diagram | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution) | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3 | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61 |
| <input type="radio"/> MM3.7 Policy SS3: York City Centre | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.8 Policy SS4: York Central | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.9 Policy SS4: York Central | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.10 Policy SS4: York Central | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64 |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67 |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.60 Policy SS15: Nestle South |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48 | |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross | |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

8. Section 5: Housing

* 10. To which modification does this response relate?

- | | |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers |
| <input type="radio"/> MM5.2 Policy H1, table 5.1 | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16 | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.4 Policy H1 Explanation | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2 | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42 |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development | <input type="radio"/> MM5.17 Policy H7: Student Housing |
| <input type="radio"/> MM5.7 Policy H2 explanation | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47 |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59 |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers | <input type="radio"/> MM5.22 Policy H10 explanation |

9. Section 6: Health and Wellbeing

* 11. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20 |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5 | <input type="radio"/> MM6.9 Policy HW4: Childcare provision |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9 | <input type="radio"/> MM6.10 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10 | <input type="radio"/> MM6.11 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a | <input type="radio"/> MM6.13 Policy HW6: Emergency Services |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities | <input type="radio"/> MM6.14 Policy HW7: Healthy Places |

10. Section 7: Education

* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

11. Section 8: Placemaking, Heritage, Design and Culture

* 13. To which modification does this response relate?

- | | |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking | <input type="radio"/> MM8.9 Policy D6: Archaeology |
| <input type="radio"/> MM8.2 Policy D1: Placemaking | <input type="radio"/> MM8.10 Policy D6 Explanation |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37 |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs | <input type="radio"/> MM8.16 Policy D13: Advertisements |

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

14. Section 11: Climate Change

* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

18. Proposed Policy Map Modifications

Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.

* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)

19. New evidence documents

* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

20. Comment Form

22. Do you support or object to the proposed modification(s)?

Support Object

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government's National Planning Policy Framework (paragraph 182).

23. If you object, please select your reason from the list below (select all that apply):

- Not positively prepared - i.e. strategy will not meet development needs
- Not justified - i.e. there is no evidence to justify the modification
- Not effective - i.e. it won't work
- Not consistent with national policy - i.e. doesn't comply with the law

24. Please set out the reasoning behind your support or objection:

Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

See submitted covering letter



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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES

DATA TRENDS

INDIVIDUAL RESPONSES

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Respondent #179 ▼



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Started: Friday, March 17, 2023 3:40:56 PM
Last Modified: Friday, March 17, 2023 4:43:41 PM
Time Spent: 01:02:45
IP Address: 91.240.17.58

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Kathryn McCain

Q3

Contact details: Please provide email and/or address

Organisation (optional) Rapleys LLP

Address 66 St James's Street

City/town London

Post code SW1A 1NE

Email address [REDACTED]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council? If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Proposed Main Modifications - link

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-

To which section does this response relate?

Section 4: Economy and Retail

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

MM4.7 Policy EC5: Rural Economy

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Page 12: Section 9: Green Infrastructure

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To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Respondent skipped this question

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

Please refer to Full Representation Letter attached - The Club contests the inclusion of the wording "on a temporary or permanent basis" to Policy EC5, proposed under Main Modification MM4.7, where Policy EC5 states that York's rural economy will be sustained and diversified by permitted camping and caravan sites for holiday and recreational use. The Club is supportive of the original wording of this policy, which would protect the Club's interests and its continued viability.

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Forward Planning Team
City of York Council
West Offices
Station Rise
York
YO1 6GA

Our ref: KRM/0202116

Date: 17 March 2023

Dear Sir/Madam,

Re: Representations to City of York Council Consultation of Main Modifications to the draft City of York Local Plan

This letter contains our representations on behalf of the Caravan and Motorhome Club (the 'Club') submitted to the City of York Council regarding the Main Modifications Consultation to the New Local Plan. The Club has a single site within the local authority area located at York Beechwood Grange Caravan Club and Motorhome Campsite, Malton Rd, York YO32 9TH. The Club request the option of establishing Pods and Residential accommodation on site.

Site and Surrounding Area

York Beechwood Grange Caravan Club and Motorhome Campsite is located north west of the A64 on Malton Road which links to the A1237 roundabout to the south. The site is located outside of the A1237 Ring Road.

The site is located within the Green Belt in an area predominantly characterised by large fields. The Caravan Club and Motorhome site itself is largely shielded from view by the existing vegetation and trees situated on the perimeter of the site, and by the Grange, a Grade II listed former residential building that forms part of the York Beechwood Grange Caravan Club and Motorhome Campsite.

In addition to the Grange, there are two further statutory listings within close proximity to the site, including Calm Cottage (Grade II Listed) and Gate Piers (Grade II Listed).

Planning Policy

Overall, we recommend that planning policy is correctly worded as to allow for the Club, an important rural economy business to develop and improve their site, to ensure its long-term viability. Together with ensuring the site can be adapted and upgraded to meet the needs and standards of its users.

Modification MM4.8 Policy EC5 Explanation – Paragraph 4.17 seeks to provide clarity regarding Green Belt Policy (See appendix 1 for summary of Policy EC5). The proposed modification states that caravan sites are inconsistent with policy requirements to protect openness, temporarily permissions may be considered, where other criteria are met. The Club contests the proposed modification and its assertion that caravan sites are incompatible with the Green Belt and necessitate harm to its openness, as it would directly inhibit the Club's ability to expand their site in the future, restricting the Club's ability to adapt to future needs and circumstance, and prejudicing the Club's long-term viability.

Rapleys – 66 St James's Street St James's London SW1A 1NE
T: 0370 777 6292 E: info@rapleys.com www.rapleys.com @rapleys linkedin/twitter

For the reasons set out above, the Club also contests the inclusion of the wording "*on a temporary or permanent basis*" to Policy EC5, proposed under Main Modification MM4.7, where Policy EC5 states that York's rural economy will be sustained and diversified by permitted camping and caravan sites for holiday and recreational use. The Club is supportive of the original wording of this policy, which would protect the Club's interests and its continued viability.

It is important to note that the important socio-economic benefits tourist accommodation plays in supporting local economies, encouraging tourism, and promoting enjoyment and education of and investment in the country's green space, including the Green Belt. To directly and intentionally restrict tourism accommodation within the Green Belt would be harmful to the wider local and rural economies of the district and directly prejudice the Club's own economic certainty. Further, the assertion that caravan sites ubiquitously cause harm to openness is unfounded and an overgeneralisation that undermines the soundness of the draft policy and thereby the draft local plan.

Proposed Modification MM10.1 seeks a complete re-write of Policy GB1: Development in the Green Belt (see appendix 1 for original wording of Policy GB1). This Policy identifies the parameters for development allowable in the Green Belt. It is recognised that the modifications to this policy fundamentally constitute an extract of Green Belt policy from the National Planning Policy Framework. However, the Club is concerned that no direct reference is made of tourism accommodation as an acceptable form of development within the Green Belt, aside from inclusion that development for facilities for outdoor recreation would be acceptable.

Whilst, given the nature of the Club's facilities, including those at the York Beechwood Grange Caravan Club and Motorhome Campsite, which allow a more direct enjoyment of the natural amenities than other forms of tourist accommodation, it is considered that the campsite and motorhome would constitute a facility for promoting and facilitating outdoor recreation, it is requested that specific reference is made to tourism accommodation within Policy GB1. In light of the proposed modification MM4.8 identified above, which specifically states caravan sites as inappropriate in the Green Belt, it is understood that this interpretation unlikely to be the intention of this policy, or the Council's interpretation of it.

We request that a specific reference is made to the inclusion of extensions and developments associated with existing sites offering tourist accommodation within draft Policy GB1, providing it does not harm the openness or landscape character of the Green Belt. This should include allowance for the upgrading of existing tourism sites, including the provision of pods, glamping and residential units for holiday lets. Such allowances would provide comfort to the Club, and ensure its continued long term economic viability. It is worth emphasising again the important role tourism and tourist accommodation plays in local and rural economies and encourages active engagement with and enjoyment of the natural environment.

On a broader note, is it considered that greater emphasis should be placed on the importance of tourist accommodation, including Caravan Sites and Camping Sites, on the local economy. Flexibility should be applied to make provision for the upgrading of existing camping and caravan sites. Ideally this would include, making specific reference to the provision and adaptation of pods, lodges, glamping and ancillary buildings, including provision and expansion of permanent caravan storage, and residential units for holiday lets. Overall, this ensures the future viability of the Club, and supports the tourism industry within York City Council.

Conclusion

As noted above, the presence of the York Beechwood Grange Caravan Club and Motorhome Campsite provides economic benefits for the wider area by bringing visitors to the local region. Therefore, the protection and enhancement of important tourist locations such as this campsite will contribute to ensuring the continued economic health and success of the site and local rural economies.

It is The Club's primary desire to ensure that policies are included in the draft Local Plan that support and encourage tourism development, and its expansion. The draft policies of the York Local Plan should make direct reference to supporting tourism accommodation, including within the Green Belt.

The Club is greatly concerned by the proposed main modifications to Policies EC5 and GB1, and request that allowances are made for the provision and expansion of tourist accommodation sites, including ancillary uses and extensions, alongside the allowances for the provision of residential units for holiday lets.

It would be beneficial for emerging policy to make provision for the upgrading of existing camping and caravan sites. Ideally making specific reference to the provision and adaptation of pods, lodges, glamping and ancillary buildings, including provision and expansion of permanent caravan storage, and residential units for holiday lets. Overall, this ensures the future viability of the Club, and supports the tourism industry within York.

Yours faithfully,

Kathryn Rose McCain

Kathryn Rose McCain (Mar 17, 2023 16:41 GMT)

Kathryn McCain
BA (Hons)
Senior Planner



Policy EC5 (Rural Economy)

In addition to the allocation in villages in Policy EC1, York's rural economy will be sustained and diversified through:

- supporting appropriate farm and rural diversification activity including office and leisure development (Use Classes B and D);
- permitting camping and caravan sites for holiday and recreational use where proposals can be satisfactorily integrated into the landscape without detriment to its character, are in a location accessible to local facilities and within walking distance of public transport to York, and would not generate significant volumes of traffic; and
- attaching a seasonal occupancy condition to permissions for visitor accommodation where it is not suitable for year-round occupation by nature of its location, design or proximity to a habitat that needs extra protection at certain times of the year

Policy GB1 (Green Belt)

Within the Green Belt, planning permission for development will only be granted where:

- i. the scale, location and design of development would not detract from the openness of the Green Belt;
- ii. it would not conflict with the purposes of including land within the Green Belt; and
- iii. it would not prejudice or harm those elements which contribute to the special character and setting of York.

AND

it is for one of the following purposes:

- agriculture and forestry; or • appropriate facilities for outdoor sport and outdoor recreation; or
- cemeteries; or
- limited infilling in existing settlements; or
- limited extension, alteration or replacement of existing buildings; or • limited affordable housing for proven local needs; or
- development of existing developed sites where this would lead to an overall improvement in the character and appearance of the Green Belt without compromising openness; or
- minerals extraction, provided high environmental standards are attainable; or
- essential engineering operations including waste disposal; or
- local transport infrastructure including highways work and Park & Ride facilities; or
- the reuse of buildings; or
- development brought forward under a Community Right to Build Order; or

- renewable energy schemes, where it can be proved that the location is necessary for technical reasons and wider environmental benefits can be demonstrated. All other forms of development within the Green Belt are considered inappropriate. Very special circumstances will be required to justify instances where this presumption against development should not apply.



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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES

DATA TRENDS

INDIVIDUAL RESPONSES

All Pages ▼

Respondent #180 ▼



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Started: Friday, March 17, 2023 4:43:42 PM
Last Modified: Friday, March 17, 2023 4:45:18 PM
Time Spent: 00:01:36
IP Address: 91.240.17.58

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Kathryn McCain

Q3

Contact details: Please provide email and/or address

Organisation (optional) Rapleys LLP

Address 66 St James's Street

City/town London

Post code SW1A 1NE

Email address [REDACTED]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council? If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Proposed Main Modifications - link

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To which section does this response relate?

Section 4: Economy and Retail

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

MM4.8 Policy EC5 Explanation – paragraph 4.17

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Page 12: Section 9: Green Infrastructure

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To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15
To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16
To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17
To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18
To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19
To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20
To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21
To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22
Do you support or object to the proposed modification(s)?

Respondent skipped this question

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

(Please see attached full representation) Modification MM4.8 Policy EC5 Explanation - Paragraph 4.17 seeks to provide clarity regarding Green Belt Policy (See appendix 1 for summary of Policy EC5). The proposed modification states that caravan sites are inconsistent with policy requirements to protect openness, temporarily permissions may be considered, where other criteria are met. The Club contests the proposed modification and its assertion that caravan sites are incompatible with the Green Belt and necessitate harm to its openness, as it would directly inhibit the Club's ability to expand their site in the future, restricting the Club's ability to adapt to future needs and circumstance, and prejudicing the Club's long-term viability.

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Forward Planning Team
City of York Council
West Offices
Station Rise
York
YO1 6GA

Our ref: KRM/0202116

Date: 17 March 2023

Dear Sir/Madam,

Re: Representations to City of York Council Consultation of Main Modifications to the draft City of York Local Plan

This letter contains our representations on behalf of the Caravan and Motorhome Club (the 'Club') submitted to the City of York Council regarding the Main Modifications Consultation to the New Local Plan. The Club has a single site within the local authority area located at York Beechwood Grange Caravan Club and Motorhome Campsite, Malton Rd, York YO32 9TH. The Club request the option of establishing Pods and Residential accommodation on site.

Site and Surrounding Area

York Beechwood Grange Caravan Club and Motorhome Campsite is located north west of the A64 on Malton Road which links to the A1237 roundabout to the south. The site is located outside of the A1237 Ring Road.

The site is located within the Green Belt in an area predominantly characterised by large fields. The Caravan Club and Motorhome site itself is largely shielded from view by the existing vegetation and trees situated on the perimeter of the site, and by the Grange, a Grade II listed former residential building that forms part of the York Beechwood Grange Caravan Club and Motorhome Campsite.

In addition to the Grange, there are two further statutory listings within close proximity to the site, including Calm Cottage (Grade II Listed) and Gate Piers (Grade II Listed).

Planning Policy

Overall, we recommend that planning policy is correctly worded as to allow for the Club, an important rural economy business to develop and improve their site, to ensure its long-term viability. Together with ensuring the site can be adapted and upgraded to meet the needs and standards of its users.

Modification MM4.8 Policy EC5 Explanation – Paragraph 4.17 seeks to provide clarity regarding Green Belt Policy (See appendix 1 for summary of Policy EC5). The proposed modification states that caravan sites are inconsistent with policy requirements to protect openness, temporarily permissions may be considered, where other criteria are met. The Club contests the proposed modification and its assertion that caravan sites are incompatible with the Green Belt and necessitate harm to its openness, as it would directly inhibit the Club's ability to expand their site in the future, restricting the Club's ability to adapt to future needs and circumstance, and prejudicing the Club's long-term viability.

For the reasons set out above, the Club also contests the inclusion of the wording *"on a temporary or permanent basis"* to Policy EC5, proposed under Main Modification MM4.7, where Policy EC5 states that York's rural economy will be sustained and diversified by permitted camping and caravan sites for holiday

and recreational use. The Club is supportive of the original wording of this policy, which would protect the Club's interests and its continued viability.

It is important to note that the important socio-economic benefits tourist accommodation plays in supporting local economies, encouraging tourism, and promoting enjoyment and education of and investment in the countryside green space, including the Green Belt. To directly and intentionally restrict tourism accommodation within the Green Belt would be harmful to the wider local and rural economies of the district and directly prejudice the Club's own economic certainty. Further, the assertion that caravan sites ubiquitously cause harm to openness is unfounded and an overgeneralisation that undermines the soundness of the draft policy and thereby the draft local plan.

Proposed Modification MM10.1 seeks a complete re-write of Policy GB1: Development in the Green Belt (see appendix 1 for original wording of Policy GB1). This Policy identifies the parameters for development allowable in the Green Belt. It is recognised that the modifications to this policy fundamentally constitute an extract of Green Belt policy from the National Planning Policy Framework. However, the Club is concerned that no direct reference is made of tourism accommodation as an acceptable form of development within the Green Belt, aside from inclusion that development for facilities for outdoor recreation would be acceptable.

Whilst, given the nature of the Club's facilities, including those at the York Beechwood Grange Caravan Club and Motorhome Campsite, which allow a more direct enjoyment of the natural amenities that other forms of tourist accommodation, it is considered that the campsite and motorhome would constitute a facility for promoting and facilitating outdoor recreation, it is requested that specific reference is made to tourism accommodation within Policy GB1. In light of the proposed modification MM4.8 identified above, which specifically states caravan sites as inappropriate in the Green Belt, it is understood that this interpretation unlikely to be the intention of this policy, or the Councils interpretation of it.

We request that a specific reference is made to the inclusion of extensions and developments associated with existing sites offering tourist accommodation within draft Policy GB1, providing it does not harm the openness or landscape character of the Green Belt. This should include allowance for the upgrading of existing tourism sites, including the provision of pods, glamping and residential units for holiday lets. Such allowances would provide comfort to the Club, and ensure its continued long term economic viability. It is worth emphasising again the important role tourism and tourist accommodation plays in local and rural economies and encourages active engagement with and enjoyment of the natural environment.

On a broader note, is it considered that greater emphasis should be placed on the importance of tourist accommodation, including Caravan Sites and Camping Sites, on the local economy. Flexibility should be applied to make provision for the upgrading of existing camping and caravan sites. Ideally this would include, making specific reference to the provision and adaptation of pods, lodges, glamping and ancillary buildings, including provision and expansion of permanent caravan storage, and residential units for holiday lets. Overall, this ensures the future viability of the Club, and supports the tourism industry within York City Council.

Conclusion

As noted above, the presence of the York Beechwood Grange Caravan Club and Motorhome Campsite provides economic benefits for the wider area by bringing visitors to the local region. Therefore, the protection and enhancement of important tourist locations such as this campsite will contribute to ensuring the continued economic health and success of the site and local rural economies.

It is The Club's primary desire to ensure that policies are included in the draft Local Plan that support and encourage tourism development, and its expansion. The draft policies of the York Local Plan should make direct reference to supporting tourism accommodation, including within the Green Belt.

The Club is greatly concerned by the proposed main modifications to Policies EC5 and GB1, and request that allowances are made for the provision and expansion of tourist accommodation sites, including ancillary uses and extensions, alongside the allowances for the provision of residential units for holiday lets.

It would be beneficial for emerging policy to make provision for the upgrading of existing camping and caravan sites. Ideally making specific reference to the provision and adaptation of pods, lodges, glamping and

ancillary buildings, including provision and expansion of permanent caravan storage, and residential units for holiday lets. Overall, this ensures the future viability of the Club, and supports the tourism industry within York.

Yours faithfully,

Kathryn McCain

BA (Hons)

Senior Planner



Appendix 1 – Draft Policies from the Local Plan – Publication Draft (Regulation 19 Consultation) – February 2018)

Policy EC5 (Rural Economy)

In addition to the allocation in villages in Policy EC1, York’s rural economy will be sustained and diversified through:

- supporting appropriate farm and rural diversification activity including office and leisure development (Use Classes B and D);
- permitting camping and caravan sites for holiday and recreational use where proposals can be satisfactorily integrated into the landscape without detriment to its character, are in a location

accessible to local facilities and within walking distance of public transport to York, and would not generate significant volumes of traffic; and

- attaching a seasonal occupancy condition to permissions for visitor accommodation where it is not suitable for year-round occupation by nature of its location, design or proximity to a habitat that needs extra protection at certain times of the year

Policy GB! (Green Belt)

Within the Green Belt, planning permission for development will only be granted where:

- i. the scale, location and design of development would not detract from the openness of the Green Belt;
- ii. it would not conflict with the purposes of including land within the Green Belt; and
- iii. it would not prejudice or harm those elements which contribute to the special character and setting of York.

AND

it is for one of the following purposes:

- agriculture and forestry; or • appropriate facilities for outdoor sport and outdoor recreation; or
- cemeteries; or
- limited infilling in existing settlements; or
- limited extension, alteration or replacement of existing buildings; or • limited affordable housing for proven local needs; or
- development of existing developed sites where this would lead to an overall improvement in the character and appearance of the Green Belt without compromising openness; or
- minerals extraction, provided high environmental standards are attainable; or
- essential engineering operations including waste disposal; or
- local transport infrastructure including highways work and Park & Ride facilities; or
- the reuse of buildings; or
- development brought forward under a Community Right to Build Order; or
- renewable energy schemes, where it can be proved that the location is necessary for technical reasons and wider environmental benefits can be demonstrated. All other forms of development within the Green Belt are considered inappropriate. Very special circumstances will be required to justify instances where this presumption against development should not apply.



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City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES

DATA TRENDS

INDIVIDUAL RESPONSES

All Pages ▼

Respondent #181 ▼



COMPLETE

Started: Friday, March 17, 2023 4:45:18 PM
Last Modified: Friday, March 17, 2023 4:46:59 PM
Time Spent: 00:01:40
IP Address: 91.240.17.58

Page 1: Survey Information

Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

Q2

Your name:

Kathryn McCain

Q3

Contact details: Please provide email and/or address

Organisation (optional) Rapleys LLP

Address 66 St James's Street

City/town London

Post code SW1A 1NE

Email address [REDACTED]

Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council? If yes we will use contact details provided above

Yes

Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Proposed Main Modifications - link

Share Link



COPY

459 responses



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To which section does this response relate?

Section 10: Managing Development in the Green Belt

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Page 12: Section 9: Green Infrastructure

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459 responses

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

MM10.1 Policy GB1: Development in the Green Belt

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

See attached representation

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City of York Council
West Offices
Station Rise
York
YO1 6GA

Our ref: KRM/0202116

Date: 17 March 2023

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Rapleys – 66 St James's Street St James's London SW1A 1NE
T: 0370 777 6292 E: info@rapleys.com www.rapleys.com @rapleys linkedin/twitter

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Yours faithfully,

Kathryn Rose McCain

Kathryn Rose McCain (Mar 17, 2023 16:41 GMT)

Kathryn McCain
BA (Hons)
Senior Planner



Policy EC5 (Rural Economy)

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